

ORIGINAL

Hazardous Household Waste Collection Event Spring 2017

PREPARED FOR:

**Todd Slatin –Purchasing Director
Lexington-Fayette Urban County Government
Room 338, Government Center
200 East Main Street
Lexington, KY 40507**

**DATE DUE: February 2, 2017
TIME DUE: 2:00 p.m.**

RFP #2-2017



Environmental Enterprises, Inc.

**LAB PACK SERVICES DIVISION
4650 Spring Grove Avenue
Cincinnati, Ohio 45232
Phone: 1-800-850-3587 / 513-853-3587
E-mail us at bdepeel@eeienv.com
Visit our WEB site at www.eeienv.com**



Bid printed on 100% recycled paper.

ENVIRONMENTAL ENTERPRISES INCORPORATED

TREATMENT FACILITY
4650 Spring Grove Ave.
Cincinnati, Ohio 45232
(513) 541-1823
Fax: (513) 541-1638
<http://www.eeenv.com>
EPA ID#: OHD 083377010



OFFICE / LABORATORY
10163 Cincinnati-Dayton Rd.
Cincinnati, Ohio 45241
(513) 772-2818
Fax: (513) 782-8950
(800) 722-2818

January 26, 2017

Lexington-Fayette Urban County Government
Room 338, Government Center
200 East Main Street
Lexington, KY 40507
Todd Slatin, Purchasing Director

Dear Mr. Slatin:

Environmental Enterprises, Inc. (EEI) is pleased to submit this proposal for the administration of a one-day Household Hazardous Waste Collection Program to be held on Saturday, April 22, 2017 from 8:30 a.m. to 4:00 p.m. at 1631 Old Frankfort Pike in Lexington, Kentucky. EEI intends to provide all the materials, technical service, labor, transportation and disposal options to support your program.

As one of the nations most diverse environmental services company with experience in household hazardous waste, EEI will assist you in taking the steps you need to achieve a successful collection event. We not only can collect, transport, recycle and dispose of the hazardous materials, we also offer assistance and guidance throughout the various stages of your program.

EEI is a full service environmental company with over 40 years of experience. No one who has entrusted EEI with the management of their waste materials has ever incurred any superfund liabilities with respect to the disposition of their materials managed by EEI. Additionally, our insurance carrier has never had a claim on our environmental impairment insurance.

We look forward for the opportunity to discuss our capabilities and philosophy on household hazardous waste management. Should you have any questions or if we can be of any additional assistance, please don't hesitate to contact me at bdepeel@eeienv.com or (800) 850-3587 at your convenience.

Sincerely,
Environmental Enterprises, Inc.

Brian J. DePeel, Director
Lab Pack Services Division



Printed on Recycled and Recyclable Paper



Spring 2017
Household Hazardous Waste Collection Proposal
Part I: Vendor Qualifications

Please describe vendor qualifications, including examples of relevant work performed in the recent past. Include the name and phone number of a contact person for each example provided. Attach to this sheet proof of all necessary state and federal licenses and permits needed for the transportation and disposal of wastes; copies of any notices of violations, administrative orders, or other enforcement actions taken by regulatory agencies within the last five years against the primary vendor, parent company, or probable sources of waste disposal; and copies of any letters of recommendation, awards or other recognition received in the last five years.



QUALIFICATIONS & EXPERIENCE

Environmental Enterprises, Inc. (EEI) has been actively involved in hazardous waste management and handling, treatment, transportation, and disposal since its inception in 1976. Our professional and seasoned technical staff is experienced in environmental disciplines from chemistry to environmental law.

Founded in 1976 as a privately held Ohio Corporation, EEI employs over 150 people nationwide, Dan McCabe as president, Tim Ernstes as vice president and Joseph McCabe as secretary and treasurer. EEI maintains offices in:

Philadelphia, PA

Cincinnati, OH

Atkins, VA

Columbus, OH

EEI's corporate office is located in Cincinnati, Ohio. EEI's treatment facility, also located in Cincinnati, occupies over 200,000 square feet and is equipped to receive and chemically treat or recycle more than 70,000 drums per year of industrial hazardous and household hazardous waste. Specialized equipment is provided to treat or recycle/reuse such waste as sodium metal, paint and paint sludges, solvents, acids, bases, cyanides, and oxidizers. Household wastes are processed in the same manner and with the same attention to detail as industrial wastes.

EEI operates four specialty divisions and two wholly owned subsidiaries. These groups provide complete turnkey services for consulting, remediation services, transportation, and disposal. Within the disposal facility EEI operates a turnkey lab pack division which services colleges and universities across the country. This group is also the basis for our household waste collection program which performs household projects throughout the year.

EEI and its personnel are committed to the preservation of the environment which is why we provide solutions that are both environmentally sound and economically attractive to our customers. As a full service company, we can provide "**One-stop shopping**" with the following capabilities:

- 1. Consulting Group**
- 2. Remediation Groups**
- 3. Transportation Group**
- 4. Facility**

Consulting. The Environmental and Industrial Hygiene Professionals of Environmental Enterprises, Inc. (EEI) have a combined experience of over seventy (70) years in the recognition, evaluation and control of chemical and physical hazards in the workplace and the environment.

Remediation Groups:

Field Services. Over the past thirty-five years Environmental Enterprises, Inc. has successfully conducted hundreds of emergency and remedial action projects, including cleanups of hazardous material spills, cleanout of tanks/surface impoundments and remediation of abandoned waste sites. EEI has also decontaminated several large manufacturing facilities through the removal and disposal of chemical wastes, PCBs, asbestos, and contaminated soils. EEI is a Coast Guard rated spill response contractor who manages OEPA directed spill cleanups in the Southern half of Ohio.



Lab Pack Services. EEI's Lab Pack Division provides segregation and packaging services for the disposal of laboratory chemicals. Pioneers in the decommissioning and treatment of lab packs, EEI provided these services to its customers while other facilities were simply landfilling lab packs. With this type of experience EEI is one of the most qualified companies in the industry to provide lab pack services.

Transportation. Midwest Environmental Transport, Inc. (MET), a wholly owned subsidiary of EEI, is currently permitted in 42 states and operates a fleet of power units, vans, tankers and dump trailers, plus specialized equipment designed for sludge and waste handling. Our management personnel understand industrial wastes, transportation and the strict regulatory aspects of their work.

Waste Management Service. EEI operates a state of the art hazardous waste treatment/disposal facility permitted by the Federal and State Environmental Protection Agencies. Located in Cincinnati, our facility can accept a wide variety of waste streams for processing, including acids and bases, waste laboratory chemicals, flammable liquids and sludges, aerosol cans, plating baths and sludges, water reactive materials, chemotherapy waste, scintillation vials and off-specification consumer products. Additionally, EEI possesses an Ohio Pharmaceutical License for the safe transport, storage and disposal of all pharmaceuticals including controlled substances whether found in clandestine laboratories, pharmacies or HHW collections. Our ATF (Alcohol, Tobacco and Firearms) permit also ensures that flammable solids, fireworks and reactives are handled, stored and disposed of under the strictest accordance of the law.

Equal Opportunity Employer. EEI is committed to Equal Employment Opportunity and Affirmative Action programs.

Insurance Coverages. See enclosed insurance certificate for EEI and MET.

Experience. EEI has over forty years' experience in the treatment, recycle, and reuse of hazardous waste.

EEI operates a fully permitted hazardous waste treatment and storage facility servicing over 1,800 generators per year. Ohio EPA indicates that this is more than any other facility in Ohio. We routinely provide services to academia, business and industry, for packaging, labor, equipment, materials, supplies, manifesting, labeling, transportation and disposal.

As a facility handling HHW, EEI has provided recycle/reuse, treatment and disposal services for the following contractors over the past twelve years.

Laidlaw Environmental
(615) 643-4511

Permafix
(Formerly Quadrex)
(904) 373-6066

Universal Waste
(813) 623-5302

Radiac Research
(718) 963-2233

Care Environmental
(201) 299-0774

EQ
(313) 923-0080



Vexor
(330) 721-9773

Onyx
(409) 736-2821

EEL is the final recycle/treatment facility for many of our customers' wastes. EEL's facility offers a wide variety of treatment technologies, i.e., recycle/reuse, chemical destruction, such as neutralization, oxidation, reduction, hydrolysis, cyanide destruction, fixation and stabilization for appropriate materials in compliance with 40CFR Part 268.

Facility Identification: **Environmental Enterprises, Inc.**
 4650 Spring Grove Avenue
 Cincinnati, Ohio 45232
 Contact: Brian DePeel
 Phone: (800) 850-3587 / (513) 853-3587
 EPA # OHD083377010

Licensing Agency: **Ohio Environmental Protection Agency**
 Southwest District Office
 401 East Fifth Street
 Dayton, Ohio 45402
 Phone: (513) 285-6094
 Fax: (513) 285-6404

EEL operates under a hazardous waste permit issued by the USEPA and the State of Ohio. EEL's Part-B permit allows EEL to accept over 400 RCRA waste codes at its Cincinnati facility. EEL also operates under USEPA authority as a commercial storer of PCBs under permit. Such a permit is required for any facility receiving PCB wastes from offsite generators. MET is also permitted by USEPA as a PCB transporter.

Availability. Representatives from EEL are available for planning meetings, site visits, presentations and assistance with the media.

Staffing. Unlike many of our competitors, EEL will only provide trained, experienced personnel to staff HHW collection events.

EEL's personnel have received training in spill response, containment, hazardous materials handling, evacuation procedures, firefighting, and emergency first aid/CPR. Employees have received the OSHA required 40 hours of training with annual updates and reviews. Awareness training is also provided to workers handling Household Hazardous Waste. Training records are available upon request.

EEL employees go through a drug screening, medical surveillance, and health monitoring program which includes annual physicals. Records, which are confidential, are available on request with the express written consent of EEL and its employees.

EEL is also a universal waste processor for pesticides, mercury wastes and all types of batteries.

Safety Record. EEL has never had any accidents or environmental releases of hazardous materials during the performance of a household waste collection event.



TRANSPORTATION

Transportation. Transportation will be performed by Midwest Environmental Transport, Inc. (MET) a wholly owned subsidiary of EEI.

Midwest Environmental Transport, Inc.
10163 Cincinnati-Dayton Road
Cincinnati, Ohio 45241
U.S. EPA I.D. No. OH000000539
DOT No. 0333081
Contact: Debi K. Riley
(513) 772-1145

Midwest Environmental Transport, Inc. (MET) is an ICC and waste transportation company which operates a fleet of power units, vans, tankers, roll-off containers, and dump trailers, plus specialized equipment designed for sludge and waste handling. By maintaining a variety of transportation vehicles we are able to service a variety of customers and transport multiple waste streams. Our current vehicle inventory includes:

- Vans
- Straight Trucks With Lift Gates
- Stainless Steel Tankers
- Acid Tankers
- Dump Trailers
- Vacuum Equipment
- Roll-Off Equipment



Our management personnel understand industrial wastes, transportation, and the strict regulatory aspects of their work. Our trained drivers are taught the strict procedures of hazardous materials handling, transportation, manifesting, placarding, and emergency spill contingency plans as well as emergency response and spill cleanup. They are periodically retrained, in addition to regulatory requirements, on the continually changing environmental and DOT regulations. All drivers participate in medical monitoring and drug screens in accordance with DOT regulatory requirements. Each vehicle is equipped with a spill response manual and equipment. A computer is utilized to prepare manifests, labels, etc., to ensure compliance with DOT and EPA shipping requirements. This system ensures proper DOT shipping descriptions, waste codes, etc.

Midwest Environmental Transport is permitted to haul hazardous materials in the following states:

Alabama	Kansas	Nevada	Texas
Arkansas	Kentucky	New Mexico	Utah
Arizona	Louisiana	New York	Virginia
California	Maryland	North Carolina	Washington DC



Hazardous Household Waste Collection Event Spring 2017
Lexington-Fayette Urban County Government - RFP#2-2017

Delaware	Michigan	Ohio	Wisconsin
Florida	Minnesota	Oklahoma	West Virginia
Georgia	Mississippi	Pennsylvania	Wyoming
Illinois	Missouri	South Carolina	
Indiana	Montana	South Dakota	
Iowa	Nebraska	Tennessee	



REFERENCES

Lexington Fayette Urban County Government (LFUCG)

Lauren Monahan
Environmental Initiatives Specialist
Division of Waste Management
675 Byrd Thurman Drive
Lexington, Kentucky 40510
(859) 367- 4948
lmonahan@lexingtonky.gov

EEL was awarded the HHW Collection for **Lexington Fayette Urban County Government (LFUCG)** for 2016.

The initial collection with EEL was held on April 23, 2016 and had 1,561 residents participating. 151,405 pounds of material was collected at that time and transported back to EEL's facility in Cincinnati, Ohio.

Average wait times for the residents was well below EEL's self-imposed requirement of 20 minutes per vehicle.

EEL also collected the City Department Drop-offs on Friday the day prior to the HHW Collection.

Northern Kentucky Solid Waste Management Area (NKSWMMA)

Kelly Bowlin
Solid Waste Management District Coordinator
5645 Idlewild Road
Burlington, Kentucky 41005
859 334-3629
kbowlin@boonecountyky.org

EEL continued its longtime working relationship with NKSWMMA after being awarded the contract again in 2015. EEL has performed HHW collections in northern Kentucky starting with Fluorescent Bulbs and Mercury and moved into full blown collections accepting most of the waste that residents deliver.

2015 was a record breaking year for NKSWMMA when 2017 residents delivered 169,666 pounds of material during a 6 hour time period.

2016 proved to be an even larger HHW collection as 2,576 residents delivered 217,161 pounds of material to the collection site. As was done in 2015, EEL utilized 4 traffic lanes to keep the cars moving during all 6 hours of this collection. EEL provided 23 staff personnel for this collection and had minimal resident waiting times remaining consistently below the 20 minute offer in each bid - which is a cornerstone example of EEL's unmatched experience, knowledge and dedication to detail on each and every event.

Final collection totals for 20156 revealed resident participation at 2,576 and total poundage collected for 2016 at 217,161 pounds.



Vanderburgh County/Evansville, IN

Mr. Joe Ballard
Vanderburgh County SWMD,
One N.W. Martin Luther King Jr., Blvd.
Evansville, IN 47708
(812) 436-7800
jballard@vanderburghgov.com

EEL has performed a HHW Collection for Joe Ballard of The Vanderburgh County Solid Waste Management District for 19 of the past 20 years with another collection already scheduled for September of 2017.

While this collection is not what it once was back in the late 90's and early 2000's, Vanderburgh County resident participation still averages ~1000 residents per collection and ~100,000 pounds of waste brought to the site.

Average wait times for the resident's remains below EEL's self-imposed requirement of 20 minutes per vehicle.

GLOW Solid Waste Management Committee

Genesee, Livingston, Orleans and Wyoming Counties
Ms. Peggy Grayson
Genesee County Bldg. 2
3837 West Main Street Road
Batavia, NY 14020
(585) 344-2580 Ext. 5463
pgrayson@co.genesee.ny.us

EEL has provided Turnkey mobile HHW collections for GLOW since 2005 moving to a different county each year to hold their collections. At the inception of this contract collection sizes were scheduled for approximately 350 residents. For 2011, the size of the collection has grown to 500 residents scheduled to participate. Initial collection totals started at 18,073 pounds of materials in 2005 and grew to 27,738 pounds in 2010.

EEL initially provided 8 personnel for the collection in 2005 and increased their personnel to 15 for 2010 to keep wait times for the residents well under EEL's self-imposed limit of 20 minutes.

Solid Waste Authority of Central Ohio (SWACO)

Mr. JD Compston, Recycling Coordinator
6220 Young Road
Grove City, Ohio 43123
(614) 871-5100
jerry.compston@swaco.org

EEL began working with the Solid Waste Authority of Central Ohio (SWACO) in 2006 on their remote collections throughout Franklin County. These consisted of 32 separate collections over a two-year period.



In 2007 SWACO extended EEI's contract thru 2018 and requested that EEI establish a permanent collection site within the city limits of Columbus. This site, located at 1249 Essex Street opened in November of 2007. This site has operated without any incidents or safety issues for the past four years with a high level of customer satisfaction.

Types of SWACO approved waste collected: Bulk fuels; Paint; Bulk used oil; Bulk Antifreeze; Corrosive acids; Corrosive bases; PCB light ballasts; flammables; Pesticides; Oxidizers; Poisons; Aerosols; Pesticide aerosols; Asbestos; Propane; Aluminum paint; Fire extinguishers; Lead acid batteries; Dry cell batteries; Ni Cad batteries; Mercury; Household cleaners; Fluorescent light bulbs; Putty & adhesives; Computer equipment.

EEI operates this site with a staff of five - resident participation numbers for 2012 totaled 5800+ residents with over of 603,000 pounds of waste collected.

Lake County Solid Waste District

Mr. Tim Gourley
105 Main Street
Painesville, Ohio 44077
(440) 350-2645
tim.gourley@lakecountyohio.gov

EEI just completed their 3rd contract year with Lake County for two collections per year in the spring and in the fall. This collection has been drawing crowds of ~1600 per collection all three years of this contract. When EEI was awarded this contract, they had been the incumbent vendor the previous 4 years. Lake County has averaged per collection 140,773 pounds of material per collection.

Southwestern Pennsylvania HHW Task Force And Pennsylvania Resources Council

Michael Stepaniak
SWPa HHW Task Force
Pennsylvania Resources Council (PRC)
Program Coordinator
64 South 14th Street
Pittsburgh, Pa. 15203
(412) 431-4449 ext. 213
michaels@prc.org

Justin Stockdale – Executive Director
Pennsylvania Resources Council (PRC)
64 South 14th Street
Pittsburgh, Pa. 15203
(412) 431-4449

Michael Stepaniak, over sees all operational activities for the six (6) SWPa HHW Task Force collections since 2006 while observing Environmental Enterprises, Inc. (EEI) site protocols, safety and operational activities.





EEL has performed six (6) collections for the Task Force and the following counties in since 2006.

Allegheny County – North Park: Allegheny County in Pennsylvania encompasses the entire City of Pittsburgh. The North Park site is typically performed in the spring and has seen resident participation since 2006 from a low of 1000 vehicles to a high in 2015 of 1549 residents. As of 2016 the average poundage of material for this site was ~100,000 pounds.

Allegheny County – Boyce Park: This site location is the center location between North and South Park and is typically held in the month of August. This site has grown from a modest start of ~500 residents participating to 758 vehicles in 2016 and averages total amount of material collected of ~54,000 pounds.

Allegheny County – South Park: This is the 3rd of the City of Pittsburgh locations and is typically held in the month of September. Of the three (3) sites in the City of Pittsburgh, South Park is typically the 2nd in resident participation however on more than one occasion has outdrawn North Park in participation. They average ~1000 vehicles and collected waste poundage of ~95,000 pounds.

Cambria County: Performed typically in the spring since 2006 at Compliance Technology in Johnstown, Pa. – which is a neighboring city to Pittsburgh. EEL serviced 347 Cambria County residents in 2016 collecting 34,034 pounds of material while again providing a zero wait-time to the residents to be unloaded.

Washington County: This county joined the SWPa HHW Task Force in 2009 and initially started on an every other year basis and likewise has seemed to move site locations every year and for 2016 was indoors at their County Fairgrounds. For 2017, this location was once again moved to the City / County's Minor League Baseball complex. The lowest participation was in 2012 when 63 residents participated however in 2016 – 619 residents participated delivering 45,249 pounds of Household Waste.

Beaver County: EEL provides its final collection event for the SWPa HHW Task Force at Beaver County. Also one of the original counties of the Task Force since 2006, this collection is held at the Beaver County Recycling Center and originally provided collection services to ~100 residents. This location has grown each and every year and serviced 576 residents in 2016 who delivered 45,249 pounds of acceptable waste to EEL.

NOTE: EEL recycles 90% of all materials collected.



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)
 3/28/2016

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER Phelan Insurance Agency, Inc. 863 East Main Street PO Box 1 Versailles OH 45380	CONTACT Lorri Wilson PHONE (A/C, No. Ext): (937) 526-3111 FAX (A/C, No.): (937) 526-5178 E-MAIL ADDRESS: lorri_wilson@phelanins.com														
INSURED Environmental Enterprises, Inc., Midwest Environmental Transport Inc. Expressway Commerce Co Inc. 10163 Cincinnati-Dayton Pike Cincinnati OH 45241	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="text-align: left;">INSURER(S) AFFORDING COVERAGE</th> <th style="text-align: left;">NAIC #</th> </tr> <tr> <td>INSURER A: Westchester Surplus Lines</td> <td>10172</td> </tr> <tr> <td>INSURER B: Ace Property & Casualty</td> <td>20699</td> </tr> <tr> <td>INSURER C:</td> <td></td> </tr> <tr> <td>INSURER D:</td> <td></td> </tr> <tr> <td>INSURER E:</td> <td></td> </tr> <tr> <td>INSURER F:</td> <td></td> </tr> </table>	INSURER(S) AFFORDING COVERAGE	NAIC #	INSURER A: Westchester Surplus Lines	10172	INSURER B: Ace Property & Casualty	20699	INSURER C:		INSURER D:		INSURER E:		INSURER F:	
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COVERAGES **CERTIFICATE NUMBER: 16-17** **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL SUBR INSR	WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	GENERAL LIABILITY			G24199770 006	4/1/2016	4/1/2017	EACH OCCURRENCE \$ 1,000,000
	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY						DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 100,000
	<input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR						MED EXP (Any one person) \$ 10,000
							PERSONAL & ADV INJURY \$ 1,000,000
							GENERAL AGGREGATE \$ 2,000,000
	GEN'L AGGREGATE LIMIT APPLIES PER						PRODUCTS - COM/PO/AGG \$ 2,000,000
	<input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC						
B	AUTOMOBILE LIABILITY			H0845310A 006	4/1/2016	4/1/2017	COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000
	<input type="checkbox"/> ANY AUTO						BODILY INJURY (Per person) \$
	<input type="checkbox"/> ALL OWNED AUTOS						BODILY INJURY (Per accident) \$
	<input checked="" type="checkbox"/> HIRED AUTOS						PROPERTY DAMAGE (Per accident) \$
	<input checked="" type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> NON-OWNED AUTOS						
A	UMBRELLA LIAB			G24199885 006	4/1/2016	4/1/2017	EACH OCCURRENCE \$ 6,000,000
	<input checked="" type="checkbox"/> EXCESS LIAB						AGGREGATE \$ 6,000,000
	<input type="checkbox"/> CLAIMS-MADE						
	<input type="checkbox"/> RETENTION \$						
A	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY			G24199770 006	4/1/2016	4/1/2017	WC STATUTORY LIMITS \$
	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH)						E L EACH ACCIDENT \$ 1,000,000
	If yes, describe under DESCRIPTION OF OPERATIONS below						E L DISEASE - EA EMPLOYEE \$ 1,000,000
							E L DISEASE - POLICY LIMIT \$ 1,000,000
A	Contractor Pollution			G24199770 006	4/1/2016	4/1/2017	Contractor Pollution 1,000,000
A	Professional Liability			G24199770 006	4/1/2016	4/1/2017	Professional Liability 1,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (Attach ACORD 101, Additional Remarks Schedule, if more space is required)
 Certificate holder is Additional Insured as required by written contract or written agreement on General Liability Form #'s ENV-3100 (8/04), ENV-3101 (8/04) and ENV-3225(10/08) and Automobile Liability Form # DA6204 (05/00).

CERTIFICATE HOLDER Environmental Enterprises, Inc. Midwest Environmental Transport, Inc. 10163 Cincinnati-Dayton Road Cincinnati, OH 45241	CANCELLATION SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS. AUTHORIZED REPRESENTATIVE Timothy Grow/JEN
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ACORD 25 (2010/05)
 INS025 (201005) 01

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**Bureau of Workers'
Compensation**

30 W. Spring St.
Columbus, OH 43215

Certificate of Ohio Workers' Compensation

This certifies that the employer listed below participates in the Ohio State Insurance Fund as required by law. Therefore, the employer is entitled to the rights and benefits of the fund for the period specified. This certificate is only valid if premiums and assessments, including installments, are paid by the applicable due date. To verify coverage, visit www.bwc.ohio.gov, or call 1-800-644-6292.

This certificate must be conspicuously posted.

Policy number and employer
666981-0

**ENVIRONMENTAL ENTERPRISES INC
10163 CINCINNATI DAYTON RD
CINCINNATI, OH 45241**



Period specified below
**07/01/2016 through
06/30/2017**

www.bwc.ohio.gov
Issued by:

Acting Administrator/CEO

You can reproduce this certificate as needed.



Ohio Bureau of Workers' Compensation

Required Posting

Effective Oct. 13, 2004, Section 4123.54 of the Ohio Revised Code requires notice of rebuttable presumption. Rebuttable presumption means an employee may dispute or prove untrue the presumption (or belief) that alcohol or a controlled substance not prescribed by the employee's physician is the proximate cause (main reason) of the work-related injury.

The burden of proof is on the employee to prove the presence of alcohol or a controlled substance was not the proximate cause of the work-related injury. An employee who tests positive or refuses to submit to chemical testing may be disqualified for compensation and benefits under the Workers' Compensation Act.



**Bureau of Workers'
Compensation**

You must post this language with the Certificate of Ohio Workers' Compensation

DP-29 BWC-1629 (Rev. April 11, 2016)



**Bureau of Workers'
Compensation**

30 W. Spring St.
Columbus, OH 43215

Certificate of Ohio Workers' Compensation

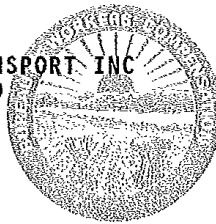
This certifies that the employer listed below participates in the Ohio State Insurance Fund as required by law. Therefore, the employer is entitled to the rights and benefits of the fund for the period specified. This certificate is only valid if premiums and assessments, including installments, are paid by the applicable due date. To verify coverage, visit www.bwc.ohio.gov, or call 1-800-644-6292.

This certificate must be conspicuously posted.

Policy number and employer
943437-0

Period specified below
**07/01/2016 through
06/30/2017**

**MIDWEST ENVIRONMENTAL TRANSPORT INC
10163 CINCINNATI DAYTON RD
CINCINNATI, OH 45241-1586**



www.bwc.ohio.gov
Issued by:

Acting Administrator/CEO

You can reproduce this certificate as needed.



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**Bureau of Workers'
Compensation**

You must post this language with the Certificate of Ohio Workers' Compensation

DP-29 BWC-1629 (Rev. April 11, 2016)



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

September 30, 2009

Re: Ohio Hazardous Waste Permit Renewal
Environmental Enterprises, Inc.
U.S. EPA ID No.: OHD 083 377 010

CERTIFIED MAIL

Mr. Daniel McCabe
Environmental Enterprises, Inc.
4650 Spring Grove Avenue
Cincinnati, Ohio 45232

Dear Mr. McCabe:

Here is the renewed Ohio Hazardous Waste Facility Installation and Operation Permit (Permit) for Environmental Enterprises, Inc. I have also enclosed a copy of the responsiveness summary Ohio EPA prepared in response to written comments the Agency received concerning the Part B permit application. The Permit is effective today, September 30, 2009. The date-stamped, page-numbered copy of the Part B permit application is also enclosed.

Please remember that according to Rule 3745-50-36 of the Ohio Administrative Code your annual hazardous waste permit fee of \$2700.00 will be due on September 30, 2010. Ohio EPA will try to notify you before this fee is due, but it is your responsibility to make sure it gets paid on time.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korteski, Director

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Mr. Daniel McCabe
Environmental Enterprises, Inc.
September 30, 2009
Page 2

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions concerning compliance, do not hesitate to call Tom Koch of Ohio EPA's Southwest District Office at (937) 285-6357.

Sincerely,

Jeremy A. Carroll, P.E.
Manager, Regulatory and Information Services Section
Division of Hazardous Waste Management

Attachments

cc: Edwin Lim/John Nyers, ERAS, DHWM, CO
Tom Koch/Harold O'Connell, SWDO, DHWM
Dale Meyer/Jae Lee US EPA, Region V
Public Interest Center, Ohio EPA
file

g:\users\jerry\EEI finalrenewalcoverl.tr\9'09.doc



Excellence in Pretreatment

This certificate is awarded to

Environmental Enterprises

for consistently meeting all local, state and federal effluent pretreatment standards
and requirements for six consecutive years

2003 – 2009



Robert B. Leventry 3/30/10

Robert B. Leventry, Director

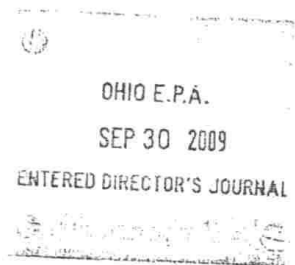
Date

Mark C. Smith 3-23-2010

Mark C. Smith, Ind. Services Mgr

Date

Butler County Commissioners • Donald L. Dixon • Gregory V. Jolivet • Charles R. Furmon



OHIO ENVIRONMENTAL PROTECTION AGENCY
OHIO HAZARDOUS WASTE FACILITY
INSTALLATION AND OPERATION PERMIT RENEWAL

Permittee: Environmental Enterprises, Inc.

Mailing Address: Environmental Enterprises, Inc.
10163 Cincinnati- Dayton Road
Cincinnati, Ohio 45241

Owner: Expressway Commerce Company, Inc.
10163 Cincinnati- Dayton Road
Cincinnati, Ohio 45241

Operator: Environmental Enterprises, Inc.
4650 Spring Grove Avenue
Cincinnati, Ohio 45232

Location: Environmental Enterprises, Inc.
4650 Spring Grove Avenue
Cincinnati, Ohio 45232

Ohio Permit No.:	05-31-0466
US EPA ID:	OHD 083 377 010
Issue Date:	Sept. 30, 2009
Effective Date:	Sept. 30, 2009
Expiration Date:	Sept. 30, 2019

AUTHORIZED ACTIVITIES


In reference to the application of Environmental Enterprises, Inc. for an Ohio Hazardous Waste Facility Installation and Operation Renewal Permit under Ohio Revised Code (ORC) Chapter 3734 and the record in this matter, you are authorized to conduct at the above-named facility the following hazardous waste management activities:

- Storage of hazardous waste in Containers and Tank
- Treatment of hazardous waste in Containers, Tanks and Miscellaneous Unit
- Address Corrective Action requirements within OAC 3745-54-101

PERMIT APPROVAL


Chris Korleski, Director
Ohio Environmental Protection Agency

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio Environmental Protection Agency.

By:  Date: 9-30-09



ENVIRONMENTAL ENTERPRISES, INC.
PERMITTED WASTE CODES

D001	F009	P024	P098	U018	U073	U127	U180	U244
D002	F010	P027	P099	U019	U074	U128	U181	U246
D003	F011	P028	P101	U020	U075	U129	U182	U247
D004	F012	P029	P102	U021	U076	U130	U183	U248
D005	F019	P030	P104	U022	U077	U131	U184	U249
D006	F027	P031	P105	U023	U078	U132	U185	U271
D007	F032	P033	P106	U024	U079	U133	U186	U278
D008	F034	P034	P107	U025	U080	U134	U187	U279
D009	F035	P037	P108	U026	U081	U135	U188	U280
D010		P039	P109	U027	U082	U136	U189	U328
D011	K002	P040	P111	U028	U083	U137	U190	U353
D012	K003	P041	P112	U029	U084	U138	U191	U359
D013	K004	P042	P113	U030	U085	U139	U192	U364
D014	K005	P043	P115	U031	U086	U140	U193	U367
D015	K006	P044	P116	U032	U087	U141	U194	U372
D016	K007	P045	P118	U033	U088	U142	U196	U373
D017	K008	P046	P119	U034	U089	U143	U197	U387
D018	K022	P047	P120	U035	U090	U144	U200	U389
D019	K061	P048	P121	U036	U091	U145	U201	U394
D020	K062	P049	P122	U037	U092	U146	U202	U395
D021	K069	P050	P123	U038	U093	U147	U203	U404
D022	K071	P051	P127	U039	U094	U148	U204	U409
D023	K086	P054	P128	U041	U095	U149	U205	U410
D024	K106	P056	P185	U042	U096	U150	U206	U411
D025	K156	P057	P188	U043	U097	U151	U207	
D026	K157	P058	P189	U044	U098	U152	U208	
D027	K158	P059	P190	U045	U099	U153	U209	
D028	K159	P060	P191	U046	U101	U154	U210	
D029	K160	P066	P192	U047	U102	U155	U211	
D030	K161	P067	P194	U048	U103	U156	U213	
D031		P068	P198	U049	U105	U157	U214	
D032	P001	P069	P202	U050	U106	U158	U215	
D033	P002	P070	P203	U051	U107	U159	U216	
D034	P003	P071	P204	U052	U108	U160	U217	
D035	P004	P073	P205	U053	U109	U161	U218	
D036	P005	P074		U055	U110	U162	U219	
D037	P006	P075	U001	U056	U111	U163	U220	
D038	P007	P076	U002	U057	U112	U164	U221	
D039	P008	P077	U003	U058	U113	U165	U222	
D040	P010	P078	U004	U059	U114	U166	U223	
D041	P011	P081	U005	U060	U115	U167	U225	
D042	P012	P082	U006	U061	U116	U168	U226	
D043	P013	P084	U007	U062	U117	U169	U227	
	P014	P085	U008	U063	U118	U170	U228	
F001	P015	P087	U009	U064	U119	U171	U234	
F002	P016	P088	U010	U066	U120	U172	U235	
F003	P017	P089	U011	U067	U121	U173	U236	
F004	P018	P092	U012	U068	U122	U174	U237	
F005	P020	P093	U014	U069	U123	U176	U238	
F006	P021	P094	U015	U070	U124	U177	U239	
F007	P022	P095	U016	U071	U125	U178	U240	
F008	P023	P097	U017	U072	U126	U179	U243	

Updated October 2012



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

OCT 1 9 2009

7001 0320 0005 8933 1273

REPLY TO THE ATTENTION OF:

CERTIFIED LETTER
RETURN RECEIPT REQUESTED

L-8J

Mr. Daniel McCabe, President
Environmental Enterprises Inc.
4650 Spring Grove Road
Cincinnati, Ohio 45232

Mr. Daniel McCabe, President
Expressway Commerce Co., Inc.
10163 Cincinnati-Dayton Road
Cincinnati, Ohio 45241

Re: Final Federal RCRA Permit
Environmental Enterprises, Inc.
Cincinnati, Ohio
OHD 083 377 010

Dear Mr. McCabe:

Enclosed is a copy of the final Federal Resource Conservation and Recovery Act (RCRA) permit for Environmental Enterprises, Inc., Cincinnati, Ohio.

Unless review is requested under 40 CFR § 124.19, the Federal permit will become effective on the date which is indicated on the title page of the enclosed Federal RCRA permit.

The draft Federal RCRA permit was publicly noticed in "The Cincinnati Enquirer Newspaper" and "WLW 700 (AM)" radio on April 24, 2009. A copy of the draft Federal RCRA permit was available for review at the Public Library of Cincinnati & Hamilton County, College Hills Branch, 1400 West North Bend Road, Cincinnati, Ohio 45224. The public comment period extended from April 24 to June 8, 2009. A public hearing was held on May 28, 2009, 6:30 p.m. at the St. Bernard Municipal Building, 120 Washington Ave., St. Bernard, OH 45217.

The comments received by the EPA on the draft Federal RCRA permit during the public comment period were submitted by EEL. The EPA's Response Summary to comments is enclosed with this letter.

Eligibility to appeal the Federal permit is discussed further in 40 CFR § 124.19. All original documents are to be signed in blue ink with five (5) copies marked as such. The petition

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for review must be received by EPA in Washington D.C., via U.S. Postal Service at the address indicated below within 30 days after service of notice of the final permit decision.

U.S. Environmental Protection Agency
Clerk of the Board
Environmental Appeals Board (1103B)
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460-0001

Submissions can also be made by hand-delivery or courier, mailed via Federal Express, UPS, or non-U.S. Postal Service at the following address:

U.S. Environmental Protection Agency
Clerk of the Board
Environmental Appeals Board
Colorado Building
1341 G Street, N.W., Suite 600
Washington, D.C. 20005

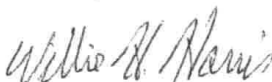
A copy of the petition should also be sent to:

U.S. Environmental Protection Agency, Region 5
RCRA Branch (LR-8J)
77 West Jackson Boulevard
Chicago, Illinois 60604

The procedures for filing an appeal are found in 40 CFR § 124.19. The administrative appeal procedure must be completed prior to any action seeking judicial review.

If you have questions concerning the final Federal RCRA permit, please contact Jae Lee of my staff at (312) 886-3781.

Sincerely,


for Margaret M. Guerriero
Director

Land and Chemicals Division

Enclosures

cc: Ed Lim, OEPA



FINAL

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

RESOURCE CONSERVATION AND RECOVERY ACT PERMIT

Facility Name and Location: Environmental Enterprises, Inc.
4650 Spring Grove Ave.
Cincinnati, Ohio 45232

Owner: Expressway Commerce Co., Inc.
10163 Cincinnati-Dayton Road
Cincinnati, Ohio 45241

Operator: Environmental Enterprises, Inc.
4650 Spring Grove Ave.
Cincinnati, Ohio 45232

EPA Identification Number: OHD 083 377 010

Effective Date: November 23, 2009

Expiration Date: September 30, 2019

Authorized Activities:

The U. S. Environmental Protection Agency (EPA) hereby issues a Resource Conservation and Recovery Act permit (hereinafter referred to as the "permit") to Environmental Enterprises, Inc. and Expressway Commerce Co., Inc. (addressed in the second person as "you") in connection with the hazardous waste management operations at the Environmental Enterprises, Inc. facility located in Cincinnati, Ohio.

This permit is issued under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984 (42 USC § 6901 *et seq.*) (collectively referred to as "RCRA") and EPA's regulations promulgated thereunder (codified, and to be codified, in Title 40 of the Code of Federal Regulations (40 CFR)).

The RCRA permit consists of both this permit, which contains the effective Federal RCRA permit conditions, and the effective State RCRA permit conditions issued by the State of Ohio's RCRA program authorized under 40 CFR Part 271 (hereinafter called the "State RCRA permit").

Any hazardous waste activity which requires a RCRA permit and is not included in the RCRA permit is prohibited



Final October 2009

Environmental Enterprises, Inc.

OHD 083 377 010

Permit Approval:

On June 28, 1989, the State of Ohio received final authorization according to Section 3006 of RCRA, 42 USC § 6926, and 40 CFR Part 271, to administer the pre-HSWA RCRA hazardous waste program. The State of Ohio also received final authorization to administer certain additional RCRA requirements on several occasions since then.

However, because the EPA has not yet authorized the State of Ohio to administer certain regulations, including the air emission standards for equipment leaks (40 CFR Part 264 Subpart BB), the air emission standards for tanks and containers (40 CFR Part 264 Subpart CC), and air emission standards for miscellaneous units, the EPA Region 5 is issuing the RCRA permit requirements for operations at your facility which fall under these regulations.

You must comply with all terms and conditions contained in this permit. This permit consists of all the conditions contained herein, the documents attached hereto, all documents listed or cross-referenced in these documents, approved submittals (including plans, schedules and other documents), the applicable regulations in 40 CFR Parts 124, 260, 261, 262, 264, 266, 268, 270, and applicable provisions of RCRA.

This permit is based on the assumption that the information submitted (1) in your RCRA Part A Permit Application and Part B Permit Application on September 5, 2007, and all other modifications to those applications and (2) in the Subparts BB and CC response dated July 13, 2005, is accurate, and the facility is configured, operated and maintained as specified in the Part A and Part B Permit Applications and other relevant documents.

Any inaccuracies in the submitted information may be grounds for the EPA to terminate, revoke and reissue, or modify this permit in accordance with 40 CFR §§ 270.41, 270.42 and 270.43; and for enforcement action. You must inform the EPA of any deviation from, or changes in, the information in the Part A or Part B Permit Application and other pertinent documents that might affect your ability to comply with the applicable regulations or conditions of this permit.

Opportunity to Appeal:

Petitions for review must be submitted within 30 days after the EPA serves notice of the final permit decision. Any person who filed comments on the draft permit or participated in the public hearing may petition the Environmental Appeals Board to review any condition of the permit decision. Any person who failed to file comments or failed to participate in the public hearing on the draft permit may file a petition for review only to the extent of the changes from the draft to the final permit decision. The procedures for permit appeals are found in 40 CFR § 124.19.



Final October 2009

Environmental Enterprises, Inc.

OHD 083 377 010

Effective Date:

This permit is effective as of **November 23, 2009** and will remain in effect until **September 30, 2019**, unless revoked and reissued under 40 CFR § 270.41, terminated under 40 CFR § 270.43, or continued in accordance with 40 CFR § 270.51(a).

By:

Margaret M. Guerriero
f1 Margaret M. Guerriero

Director

Land and Chemicals Division

Date:

10/19/09





Final October 2009

Environmental Enterprises, Inc.

OHD 083 377 010

OHD 083 377 010
 Environmental Enterprises, Inc.

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October 2009

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SECTION I—STANDARD PERMIT CONDITIONS

I.A EFFECT OF PERMIT

You are hereby allowed to manage hazardous waste at the Environmental Enterprises, Inc. ("facility") in accordance with this permit. Under this permit, the operation of units managing RCRA hazardous waste must comply with all terms and conditions in this permit. Other aspects of the storage of RCRA hazardous wastes in tanks and containers are subject to the conditions in the State RCRA permit.

Subject to 40 CFR § 270.4, compliance with the RCRA permit during its term generally constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA except for those requirements not included in the permit which: (1) become effective by statute; (2) are promulgated under 40 CFR Part 268 restricting the placement of hazardous waste in or on the land; (3) are promulgated under 40 CFR Part 264 regarding leak detection systems; or (4) promulgated under subparts AA, BB, or CC of 40 CFR Part 265 limiting air emissions. (40 CFR § 270.4)

This permit does not: (1) convey any property rights or any exclusive privilege; (2) authorize any injury to persons or property, or invasion of other private rights; or (3) authorize any infringement of state or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued, or any action brought, under: (1) Sections 3008(a), 3008(h), 3013, or 7003 of RCRA; (2) Sections 104, 106(a), or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 USC §§ 9601 *et seq.* (commonly known as CERCLA); or (3) any other law protecting public health or the environment. (40 CFR §§ 270.4 and 270.30(g))

I.B PERMIT ACTIONS

I.B.1 Permit Review, Modification, Revocation and Reissuance, and Termination

The EPA may review, modify, or revoke and reissue this permit, or terminate it for cause, as specified in 40 CFR §§ 270.41, 270.42, and 270.43. The EPA may also review and modify this permit, consistent with 40 CFR § 270.41, to include any terms and conditions it determines are necessary to protect human health and the environment under Section 3005(c)(3) of RCRA. The filing of a request for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance on your part will not stay the applicability or enforceability of any permit condition. (40 CFR § 270.30(f))



Final Permit
October 2009

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You may request a modification of this permit under the procedures specified in 40 CFR § 270.42. A class 1 modification is generally allowed without prior approval by EPA except under certain conditions as described in 40 CFR § 270.42(a)(2). A class 2 modification requires prior approval by U. S. EPA as described in 40 CFR §270.42(b). However, you may perform construction associated with a Class 2 permit modification request beginning 60 days after submission of the request unless the Director establishes a later date under 40 CFR § 270.42(b)(8). Procedures for a class 3 modification are specified in 40 CFR § 270.42(c). You must not perform any construction associated with a Class 3 permit modification request until such modification request is granted and the modification becomes effective. (40 CFR §§ 270.42(b)(8) and 270.42(c))

I.B.2 Permit Renewal

This permit may be renewed as specified in 40 CFR § 270.30(b) and Section I.E.2 of this permit. In reviewing any application for a permit renewal, the EPA will consider improvements in the state of control and measurement technology, and changes in applicable regulations. (40 CFR § 270.30(b) and RCRA Section 3005(c)(3))

I.C SEVERABILITY

This permit's provisions are severable; if any permit provision, or the application of any permit provision to any circumstance, is held invalid, such provision's application to other circumstances and the remainder of this permit will not be affected. Invalidation of any statutory or regulatory provision on which any condition of this permit is based does not affect the validity of any other statutory or regulatory basis for that condition. (40 CFR § 124.16(a))

I.D DEFINITIONS

The terms used in this permit will have the same meaning as in 40 CFR Parts 124, 260 through 266, 268 and 270, unless this permit specifically provides otherwise. Where neither the regulations nor the permit define a term, the term's definition will be the standard dictionary definition or its generally accepted scientific or industrial meaning.

I.E. DUTIES AND REQUIREMENTS

I.E.1 Duty to Comply

You must comply with all conditions of this permit, except to the extent and for the duration for which an emergency permit authorizes such noncompliance (40 CFR § 270.61). Any permit noncompliance, except under the terms of an emergency permit, constitutes a violation of RCRA and will be grounds for: enforcement action; permit



Final Permit
October 2009

OHD 083 377 010
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termination, revocation and reissuance, or modification; or denial of a permit renewal application. (40 CFR § 270.30(a))

I.E.2 Duty to Reapply

If you wish to continue an activity this permit regulates after its expiration date, you must apply for and obtain a new permit. You must submit a complete application for a new permit at least 180 days before the permit expires, unless the Director grants permission for a later date. The Director will not grant permission to submit the complete application for a new permit later than the permit's expiration date. (40 CFR §§ 270.10(h) and 270.30(b))

I.E.3 Permit Expiration

Unless revoked or terminated, this permit and all conditions herein will be effective for approximately 10 years from this permit's effective date. This permit and all conditions herein will remain in effect beyond the permit's expiration date if you have submitted a timely, complete application (40 CFR § 270.10 and §§ 270.13 through 270.29), and, through no fault of your own, the Director has not made a final determination regarding permit reissuance. (40 CFR §§ 270.50 and 270.51)

I.E.4 Need to Halt or Reduce Activity Not a Defense

In an enforcement action, you are not entitled to a defense that it would have been necessary to halt or reduce the permitted activity to maintain compliance with this permit. (40 CFR § 270.30(c))

I.E.5 Duty to Mitigate

In the event of noncompliance with this permit, you must take all reasonable steps to minimize releases to the environment resulting from the noncompliance and must implement all reasonable measures to prevent significant adverse impacts on human health or the environment. (40 CFR § 270.30(d))

I.E.6 Proper Operation and Maintenance

You must always properly operate and maintain all facilities and treatment and control systems (and related appurtenances) that you install or use to comply with this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance/quality control procedures. This provision requires you to operate back-up or auxiliary facilities or similar systems only when



Final Permit
October 2009

OHD 083 377 010
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necessary to comply with this permit. (40 CFR § 270.30(e))

I.E.7 Duty to Provide Information

You must provide the Director, within a reasonable time, any relevant information that the Director requests to determine whether there is cause to modify, revoke and reissue, or terminate this permit, or to determine permit compliance. You must also provide the Director, upon request, with copies of any records this permit requires. The information you must maintain under this permit is not subject to the Paperwork Reduction Act of 1995, 44 USC §§ 3501 *et seq.* (40 CFR §§ 264.74(a) and 270.30(h))

I.E.8 Inspection and Entry

Upon the presentation of credentials and other legally required documents, you must allow the Director or an authorized representative to:

I.E.8.a Enter at reasonable times upon your premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;

I.E.8.b Have access to and copy, at reasonable times, any records that you must keep under the conditions of this permit;

I.E.8.c Inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

I.E.8.d Sample or monitor any substances at any location at reasonable times, to assure permit compliance or as RCRA otherwise authorizes.

Notwithstanding any provision of this permit, EPA retains the inspection and access authority which it has under RCRA and other applicable laws. (40 CFR § 270.30(i))

I.E.9 Monitoring and Records

I.E.9.a Samples and measurements taken for monitoring purposes must be representative of the monitored activity. The methods used to obtain a



Final Permit
October 2009

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representative sample of the feed streams, treatment residues, hazardous wastes, or other wastes, gases or materials to be analyzed must be the appropriate methods from Appendix I of 40 CFR Part 261, or the methods specified in the Waste Characteristics section which is Section C of the Part B Permit Application, or an equivalent method approved by the Director. Laboratory methods must be those specified in *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods* (SW-846, latest edition), *Methods for Chemical Analysis of Water and Wastes* (EPA 600/4-79-020), or an equivalent method, as specified in the referenced Waste Characteristics section. (40 CFR § 270.30(j)(1))

I.E.9.b You must retain, at the facility, records of all monitoring information as specified in 40 CFR § 264.74.

I.E.9.c You must retain all reports, records, or other documents, required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the reports, records, or other documents, unless a different period is specified in this permit. The 3-year period may be extended by request of the Director at any time and is automatically extended during the course of any unresolved enforcement action regarding this facility. (40 CFR §§ 270.30(j) and 270.31))

I.E.10 Reporting Planned Changes

You must notify the Director as soon as possible of any planned physical alterations or additions to the permitted facility. (40 CFR § 270.30(l)(1))

I.E.11 Reporting Anticipated Noncompliance

You must notify the Director, in advance, of any planned changes in the permitted facility or activity that may result in permit noncompliance. Advance notice will not constitute a defense for any noncompliance. (40 CFR § 270.30(l)(2))

I.E.12 Certification of Construction

You must not operate any RCRA air emission control devices completed after the effective date of this permit until you have submitted to the Director, by certified mail or hand-delivery, a letter signed both by your authorized representative and by a registered professional engineer. That letter must state that the portions of the facility covered by this permit have been constructed in compliance with the applicable conditions of this permit. In addition, you must not operate the permitted control devices until either: (40 CFR § 270.30(l)(2))



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I.E.12.a The Director or his/her representative has inspected those portions of the facility and finds them in compliance with the conditions of the permit; or

I.E.12.b The Director waives the inspection.

I.E.13 Transfer of Permits

This permit is not transferable to any person, except as specified in 40 CFR § 270.40. Under 40 CFR § 270.40, the Director may require permit modification, or revocation and reissuance to change your name and incorporate other RCRA requirements. Before transferring ownership or operation of the facility during its operating life, you must notify the new owner or operator in writing of the requirements of 40 CFR Parts 264, 266, 268, and 270, and must provide a copy of the RCRA permit to the new owner or operator. (40 CFR §§ 264.12(c), 270.30(l)(3), and 270.40(a))

I.E.14 Twenty-Four Hour Reporting

I.E.14.a You must report to the Director any noncompliance with this permit that may endanger human health or the environment. Any such information must be promptly reported orally, but no later than 24 hours after you become aware of the circumstances.

I.E.14.b The report must include the following (40 CFR §§ 270.30(l)(6) and 270.33): (1) Information concerning release of any hazardous waste that may endanger public drinking water supplies; (2) Information of a release or discharge of hazardous waste; or (3) Information of a fire or explosion from the hazardous waste management facility, that could threaten the environment or human health outside the facility. You must include the following information:

- (1) Name, title and telephone number of the person making the report;
- (2) Name, address and telephone number of the facility owner or operator;
- (3) Facility name, address and telephone number;
- (4) Date, time and type of incident;
- (5) Location and cause of incident;
- (6) Identification and quantity of material(s) involved;



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- (7) Extent of injuries, if any;
- (8) Assessment of actual or potential hazards to the environment and human health outside the facility, where applicable;
- (9) Description of any emergency action taken to minimize the threat to human health and the environment; and
- (10) Estimated quantity and disposition of recovered material that resulted from the incident.

I.E.14.c In addition to the oral notification required under Sections I.E.14.a and I.E.14.b of this permit, a written report must also be provided within 5 calendar days after you become aware of the circumstances. The written report must include, but is not limited to, the following:

- (1) Name, address and telephone number of the person reporting;
- (2) Incident description (noncompliance and/or release or discharge of hazardous waste), including cause, location, extent of injuries, if any, and an assessment of actual or potential hazards to the environment and human health outside the facility, where applicable;
- (3) Period(s) in which the incident (noncompliance and/or release or discharge of hazardous waste) occurred, including exact dates and times;
- (4) Whether the incident's results continue to threaten human health and the environment, which will depend on whether the noncompliance has been corrected and/or the release or discharge of hazardous waste has been adequately cleaned up; and
- (5) If the noncompliance has not been corrected, the anticipated period for which it is expected to continue and the steps taken or planned to reduce, eliminate, and prevent the recurrence of the noncompliance.

The Director may waive the requirement that written notice be provided within 5 calendar days; however, you will then be required to submit a written report within 15 calendar days of the day on which you must provide oral notice, in accordance with Sections I.E.14.a and I.E.14.b of



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this permit. (40 CFR §§ 270.30(1)(6) and 270.30(h))

I.E.15 Other Noncompliance

You must report all instances of noncompliance not reported under Section I.E.14 of this permit, when any other reports this permit requires are submitted. The reports must contain the information listed in Section I.E.14 of this permit. (40 CFR § 270.30(1)(10))

I.E.16 Other Information

I.E.16.a Whenever you become aware that you failed to submit or otherwise omitted any relevant facts in the Part A or Part B Permit Application or other submittal, or submitted incorrect information in the Part A or Part B Permit Application or other submittal, you must promptly notify the Director of any incorrect information or previously omitted information, submit the correct facts or information, and explain in writing the circumstances of the incomplete or inaccurate submittal. (40 CFR §§ 270.30(1)(11) and 270.30(h))

I.E.16.b All other requirements contained in 40 CFR § 270.30 not specifically described in this permit are incorporated into this permit and you must comply with all those requirements.

I.F SIGNATORY REQUIREMENT

You must sign and certify all applications, reports, or information this permit requires, or which are otherwise submitted to the Director, in accordance with 40 CFR § 270.11. (40 CFR § 270.30(k))

I.G REPORTS, NOTIFICATIONS AND SUBMITTALS TO THE DIRECTOR

Except as otherwise specified in this permit, all reports, notifications, or other submittals that this permit requires to be sent or given to the Director should be sent by certified mail or express mail, or hand-delivered to the Environmental Protection Agency Region 5, RCRA Branch, at the following address:

RCRA Branch, LR-8J
Land and Chemicals Division
EPA Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604



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I.H CONFIDENTIAL INFORMATION

In accordance with 40 CFR Part 2, Subpart B, you may claim any information this permit requires, or otherwise submitted to the Director, as confidential. You must assert any such claim at the time of submittal in the manner prescribed on the application form or instructions or, in the case of other submittals, by stamping the words "Confidential Business Information" on each page containing such information. If you made no claim at the time of submittal, the Director may make the information available to the public without further notice. If you assert a claim, the information will be treated in accordance with the procedures in 40 CFR Part 2. (40 CFR § 270.12)

I.I DOCUMENTS TO BE MAINTAINED AT THE FACILITY

You must maintain at the facility, until closure is completed and certified, the following documents and all amendments, revisions, and modifications to them.

I.I.1 Operating Record

You must maintain in the facility's operating record the documents required by this permit, and by the applicable portions of 40 CFR §§ 264.1035, 264.1064, 264.1089, 264.13, and 264.73 (as they apply to your facility and to the units and equipment used to comply with this permit).

I.I.2 Notifications

You must maintain notifications from generators that are required by 40 CFR § 268.7 to accompany an incoming shipment of hazardous wastes subject to 40 CFR Part 268, Subpart C, that specify treatment standards, as required by 40 CFR §§ 264.73, 268.7, and this permit.

I.I.3 Copy of Permit

You must keep a copy of this permit on site, and you must update it as necessary to incorporate any official permit modifications.

I.J ATTACHMENTS AND DOCUMENTS INCORPORATED BY REFERENCE

I.J.1 All attachments and documents that this permit requires to be submitted, if any, including all plans and schedules are, upon the Director's approval, incorporated into this permit by reference and become an enforceable part of this permit. Since required items are essential elements of this permit, failure to submit any of the required items or submission of inadequate or insufficient information may subject you to enforcement



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action under Section 3008 of RCRA. This may include fines, or permit suspension or revocation.

I.J.2 This permit also includes the documents attached hereto, all documents cross-referenced in these documents, and the applicable regulations contained in 40 CFR Parts 124, 260, 261, 262, 264, 266, 268, and 270, and applicable provisions of RCRA, all of which are incorporated herein by reference.

I.J.3 Any inconsistency or deviation from the approved designs, plans and schedules is a permit noncompliance. The Director may grant written requests for extensions of due dates for submittals required in this permit.

I.J.4 If the Director determines that actions beyond those provided for, or changes to what is stated herein, are warranted, the Director may modify this permit according to procedures in Section I.B of this permit.

I.J.5 If any documents attached to this permit are found to conflict with any of the conditions in this permit, the condition will take precedence.

I.K COORDINATION WITH THE CLEAN AIR ACT

You must fully comply with all applicable Clean Air Act (CAA) and RCRA permit limits. Where two or more operating limitations apply, the most stringent operating limitations take precedence.

SECTION II -- AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS **(40 CFR PART 264 SUBPART BB)**

II.A EQUIPMENT LEAKS

II.A.1 Applicable Equipment

You must comply with all applicable requirements of 40 CFR § 264.1050 through 40 CFR § 264.1065, regarding air emission standards for equipment leaks. The equipment to which these requirements are applicable (hereinafter referred to as applicable equipment) is specified in 40 § CFR 264.1050 et seq. Applicable equipment generally includes equipment (i) that is listed in 40 § CFR Part 264, Subpart BB and (ii) that contains or contacts hazardous waste with organic concentrations of at least 10 percent by weight that is managed in one of the units described in 40 CFR 264.1050(b). This permit does not allow you to use any applicable equipment other than pumps, open-ended valves or lines, or closed vent systems and control devices. For purposes of this



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permit, all applicable equipment that contains or contacts hazardous waste processed at this facility is considered to be "in light liquid service" as defined in 40 CFR § 264.1031.

II.A.2 Pumps in Light Liquid Service (40 CFR § 264.1052)

II.A.2.a Each pump in light liquid service must be monitored monthly to detect leaks by the methods specified in 40 CFR § 264.1063(b), except: any pump that is (1) equipped with dual mechanical seal system satisfying the requirements of 40 CFR 264.1052(d), (2) designated, as described in 40 CFR § 264.1064(g)(2), for no detectable emissions, as indicated by an instrument reading of less than 500 parts per million (ppm) above background, and meeting the requirements of 40 CFR § 264.1052(e), or (3) equipped with a closed vent system complying with the requirements of 40 CFR § 264.1052(f).

II.A.2.b Each pump shall be checked by visual inspection each calendar week for seal leaks.

II.A.2.c A leak is detected if: (1) an instrument reading of 10,000 ppm or greater is measured, or (2) there is an indication of liquid dripping from the pump seal.

II.A.2.d When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR § 264.1059 - Standards: Delay of repair. The first attempt at repair must be made no later than 5 calendar days after each leak is detected.

II.A.3 Open-ended Valves or Lines (40 CFR § 264.1056)

II.A.2.a Each open-ended valve or line must be equipped with a: (1) cap, (2) blind flange, (3) plug, or (4) second valve, which seals the open end at all times except during operations requiring hazardous waste stream flow through the open-ended valve or line.

II.A.2.b When a double block and bleed system is used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall seal the open end at all other times.

II.A.4 Delay of Repair (40 CFR § 264.1059)

II.A.4.a Delay of repair of equipment for which leaks have been detected will be allowed if: (1) the repair is technically infeasible without a hazardous waste management unit shutdown (in such case, repair of this equipment shall occur before the end of the next hazardous waste management unit



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shutdown); or (2) the equipment is isolated from the hazardous waste management unit and does not continue to contain or contact hazardous waste with organic concentrations at least 10 % by weight.

II.A.4.b Delay of repair for valves will be allowed if: (1) emissions of purged material resulting from immediate repair are greater than the emissions likely to result from delay of repair; and (2) when repair procedures are effected, the purged material is collected and destroyed or recovered in a control device complying with 40 CFR § 264.1060.

II.A.4.c Delay of repair for pumps will be allowed if: (1) repair requires the use of a dual mechanical seal system that includes a barrier fluid system; and (2) repair is completed as soon as practicable, but not later than 6 months after the leak was detected.

II.A.4.d Delay of repair beyond a hazardous waste management unit shutdown will be allowed for a valve only if it meets the provisions of 40 CFR § 264.1059(e).

II.A.5 Closed-Vent Systems and Control Devices (40 CFR § 264.1060)

Closed-vent systems and control devices that are subject to the provisions of 40 CFR Part 264, Subpart BB (40 CFR §§ 264.1050 through 264.1065) shall comply with the provisions of 40 CFR §§ 264.1033 and 264.1060.

II.B TEST METHODS AND PROCEDURES (40 CFR § 264.1063)

The leak test methods and procedures must be as specified in 40 CFR § 264.1063.

II.C RECORDKEEPING AND REPORTING REQUIREMENTS
(40 CFR §§ 264.1064 and 264.1065)

You must comply with the recordkeeping and reporting requirements of 40 CFR § 264.1064 and 264.1065.

SECTION III – AIR EMISSION STANDARDS FOR CONTAINERS, TANKS, AND
SUBPART X UNIT (40 CFR PART 264 SUBPART CC)

You are permitted by the State RCRA Permit to store hazardous wastes in four tanks (T #1, T #2, T #3, and T #4) which are located at the main building. The total capacity of these tanks is 12,050 gallons (T #1: 4,000 gallons, T #2: 1,500 gallons, T #3: 6,000 gallons, and T #4: 550 gallons). All of



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these four tanks contain aqueous metal bearing hazardous waste. You indicated that all hazardous waste entering these tanks has an average volatile organic (VO) concentration less than 500 parts per million by weight (ppmw) at the point of waste origination. Under 40 CFR § 264.1082(c)(1), tanks for which all hazardous waste entering the unit has an average VO concentration at the point of waste origination of less than 500 ppmw are exempt from the requirements in 40 CFR §§ 264.1084 through 264.1087. Such tanks remain subject, however, to the requirements of 40 CFR §§ 264.1089 and 264.1090.

Hazardous waste is also stored in containers in the permitted containers storage area located at annex and main buildings. The maximum capacity of these container storage areas is 96,275 gallons.

You must comply with all applicable requirements of 40 CFR § 264.1080 through 40 CFR § 264.1090, regarding air emission standards for containers and tanks managing hazardous waste. All tanks not exempt from 40 CFR §§ 264.1084 through 264.1087 based on the provisions of 40 CFR § 264.1082(c)(1) must be managed using the applicable standards at 40 CFR § 264.1084, 40 CFR § 264.1086, and 40 CFR § 264.1087.

You must not conduct waste stabilization processes, as defined in 40 CFR § 265.1081, on any hazardous waste in containers that are subject to the requirements of Section III.A or III.B below, or in tanks that do not meet the requirements of Section III.C below.

For purpose of this permit, all containers that contain hazardous waste processed at this facility are considered to be "in light material service" as defined in 40 CFR § 265.1081.

III.A CONTAINER LEVEL 1 STANDARDS

You must manage containers that contain hazardous waste and that have a design capacity greater than 0.1 m³ (26.4 gallons) and less than or equal to 0.46 m³ (121 gallons) with Container Level 1 standards as described at 40 CFR § 264.1086(c). When managing hazardous waste in Level 1 containers, you must comply with the following requirements:

III.A.1 A Level 1 container must:

- (a) meet the applicable Department of Transportation (DOT) regulations as specified in 40 CFR § 264.1086(f),
- (b) be equipped with a cover and closure devices with an acceptable tightness and construction materials in accordance with 40 CFR § 264.1086(c)(1)(ii), or



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- (c) be an open-top container with organic vapor suppressing barrier to prevent hazardous waste from being exposed to the atmosphere as specified in 40 CFR § 264.1086(c)(1)(iii).

Containers that do not meet DOT regulation specified in 40 CFR § 264.1086(f) must be equipped with covers and enclosures suitable for the physical and chemical characteristics of hazardous waste in containers, for maintaining container integrity throughout the life of the container, and for the environments under which the containers are placed in the storage facility. Any chemical used for vapor suppression must not generate heat and/or fume and must be compatible with the hazardous waste in the container. Vapor suppression chemicals must maintain an acceptable and stable barrier between the barrier and the hazardous waste, thus preventing the release of volatile organics into the environment. The barrier shall not chemically react to the hazardous waste.
(40 CFR § 264.1086(c)(2))

III.A.2 All covers and closure devices must be in closed position whenever hazardous waste is in a container. Opening of a closure device or cover is allowed if it meets the purposes of and operates as defined in 40 CFR § 264.1086(c)(3)(i) through (v).

III.A.3 You must inspect the containers and their covers and closure devices in accordance with 40 CFR § 264.1086(c)(4)(i) and (ii) and repair defects in accordance with 40 CFR § 264.1086(c)(4)(iii).

III.B LEVEL 2 CONTAINER REQUIREMENTS

You must manage containers that contain hazardous waste and that have a design capacity greater than 0.46 m³ (121 gallons) with Container Level 2 standards as described at 40 CFR § 264.1086(d). When storing hazardous waste in Level 2 containers you must comply with the following requirements:

III.B.1 As specified in 40 CFR § 264.1086(d)(1), a Level 2 container must be:

III.B.1.a A container that meets the applicable U.S. Department of Transportation regulations on packaging hazardous materials for transportation as specified in 40 CFR § 264.1086(f); or

III.B.1.b A container that operates with no detectable organic emissions as defined in 40 CFR § 265.1081 and determined in accordance with the procedure specified in 40 CFR § 264.1086(g); or



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III.B.1.c A container that has been demonstrated within the preceding 12 months to be vapor-tight by using 40 CFR Part 60, appendix A, Method 27 in accordance with the procedure specified in 40 CFR § 264.1086(h).

III.B.2 You shall transfer hazardous waste into or out of a container in such a manner as to minimize exposure of the hazardous waste to the atmosphere, to the extent practical, as specified in 40 CFR § 264.1086(d)(2).

III.B.3 You shall install all covers and closure devices for the container whenever a hazardous waste is in a container. You shall secure and maintain each closure device in the closed position except during filling and removal operations as specified in 40 CFR § 264.1086(d)(3).

III.B.4 You shall inspect the containers and their covers and closure devices in accordance with 40 CFR § 264.1086(d)(4)(i) and (ii). When a defect is detected for the container, cover, or closure devices, you shall repair the defect in accordance with 40 CFR § 264.1086(d)(4)(iii).

III.C TANK CONTROLS

The following provisions apply to tanks T #1, T #2, T #3, and T #4.

III.C.1 In order to be exempt from the provisions of 40 CFR §§ 264.1084 and 264.1087, you shall demonstrate by direct measurement or approved method that all hazardous waste stored in the tanks (Tanks #1, #2, #3, and #4) has average VO concentration less than 500 ppmw at the point of waste origination in accordance with 40 CFR § 264.1082(c)(1). The average VO concentration shall be determined using the procedures specified in 40 CFR §§ 264.1083(a) and 265.1084(a)(2), (3), and/or (4).

III.C.2 For each tank, you must review and update the determination in Section III.C.1 in accordance with 40 CFR § 264.1082(c)(1) at least one every 12 months following the date of the initial determination for the hazardous waste stream entering the unit.

III.C.3 For each tank, you must prepare and maintain the records described 40 CFR § 264.1089(f). These records to be maintained at the site shall include, but not limited to, the type and origination of the hazardous waste stored in the tank, time and location of VO analysis, method used for the VO analysis, results of VO analysis, and any follow-up decision based on the VO data. If any hazardous waste is rejected due to the VO data, the record shall describe in detail the destination of the rejected hazardous waste. These records must be maintained as part of the operating record at the facility. Each tank is subject to the reporting requirements in 40 CFR § 264.1090(a).



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III.C.4 For any hazardous waste with average VO concentration above 500 ppmw, you shall not store such hazardous waste in these tanks.

III.D MISCELLANEOUS UNIT (40 CFR PART 264, SUBPART X)

The miscellaneous unit (Subpart X unit) to be regulated under this section includes shredder #1 and the bottom container collecting liquid hazardous waste.

You shall control air pollutant emissions from the Subpart X unit located in the main building to comply with 40 CFR § 264.601. The emission control shall consist of: (1) an enclosure housing the shredder #1 unit and its attached doors and windows, (2) a closed vent system, including an exhaust fan with a capacity to maintain a negative pressure inside the enclosure and ductwork connecting the enclosure to a control device, and (3) a carbon adsorption system functioning as the control device.

III.D.1 The design and operation of shredder #1 (with bottom container), the conveyors, and the compactor shall comply with the following requirements:

III.D.1 a Shredder #1 (with bottom container) shall be designed, operated and maintained in accordance with the operational specifications described in the Part B Permit Application, Section B. The gases, vapors, and fumes emitted from hazardous waste in the enclosure room must be vented by the closed vent system to the carbon adsorption system to be treated.

III.D.2 The enclosure consists of a room (enclosure room) with four walls, a ceiling, a floor, a door opening, an opening with conveyor belt for loading shredder #1, garage door, and an opening through which shredding waste from shredder #1 can be ejected from the enclosure room. The enclosure room shall comply with the following requirements

III.D.2.a You shall design and operate the enclosure room in accordance with the criteria for a permanent total enclosure as specified in "Procedure T – Criteria for and Verification of a Permanent or Temporary Total Enclosure" under 40 CFR § 52.741 (Procedure T). You shall perform the verification procedure for the enclosure room as specified in Section 5.0 of such Procedure T annually. The first such test shall be performed within 30 days after the issuance date of this permit. Before you conduct the annual Procedure T test, you shall notify the EPA including a brief description and date of the test, monitoring equipment to be used, calibration and design specification of the monitoring devices, and other related information.



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III.D.2.b All access doors, windows or other openings whose areas are not included in determining the total area of natural draft openings (NDOs) under paragraphs 4.1 (with reference to paragraph 3.3) and/or 5.2 of Procedure T shall be kept closed during routine operation of the process. Routine operation of the process includes those times when hazardous waste is present in the enclosure room, when gases, vapors, or fumes from hazardous waste are present in the enclosure room, and/or when shredder #1 is in operation. In cases of emergency or malfunction, the doors may be open in such conditions, but only as long as necessary to allow authorized personnel equipped with all necessary safety devices and other equipment, to enter and exit the enclosure room to safely address the emergency or malfunction.

III.D.2.c Each time you perform the verification procedure in Section 5 of Procedure T, you shall prepare written documentation accurately recording all results of the procedure. All such documentation shall be maintained as part of the facility operating record for at least 3 years.

III.D.3 The closed vent system and carbon adsorption system shall comply with the following requirements:

III.D.3.a The closed vent system shall route the gases, vapors, and fumes emitted from hazardous waste in the enclosure room to the carbon adsorption system.

III.D.3.b The closed vent system and carbon adsorption system (used as a control device) shall comply the requirements as stipulated in 40 CFR § 264.1087. The closed vent system shall meet the requirements of 40 CFR § 264.1033(k)(2).

III.D.3.c The closed vent system and carbon adsorption system shall be operated and negative pressure shall be maintained within the enclosure room at all times when shredder #1 is in operation, when hazardous waste is present in the enclosure room, when shredder #1 is being loaded, when shredding waste is being ejected from the enclosure room, or when vapor from hazardous waste is present in the enclosure room. You shall continue to operate the exhaust fan and closed vent system after waste is no longer present in the enclosure room and after shredder #1 has been turned off until all of vapors in the enclosure room including back-flow from the compactor have been vented into the vent duct and to the control device. You shall determine the necessary waiting time based on the exhaust fan capacity, volume of the enclosure room including vent duct and compactor for back-flow, and other pertinent data of the vapor. Such determination and end results of any calculation shall be documented in writing and retained at the facility.



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III.D.3.d The carbon adsorption system shall have a minimum removal efficiency of 95% in accordance with 40 CFR § 264.1087(c)(1)(i). You shall demonstrate that the carbon adsorption system achieves this performance standard as specified in 40 CFR § 264.1087(c)(5) and (c)(6).

III.D.3.e The concentration level of the organic compounds in the exhaust vent stream from the carbon adsorption system shall be accurately monitored with one of the following frequencies: (a) daily, or (b) an interval that is no greater than 20 percent of the time required to consume the total carbon working capacity established as a requirement of 40 CFR § 264.1035(b)(4)(iii)(G), whichever is longer. The carbon adsorption system shall be monitored by a photoionization detector or other suitable instrument that can detect carbon breakthrough. You shall calibrate, inspect and maintain the monitoring device as necessary to assure proper function and in accordance with the manufacturer's specifications. You shall replace the existing carbon in the control device with fresh carbon immediately when carbon breakthrough is indicated. (40 CFR §§ 264.1087(c)(3)(i) and 264.1033(h)(1)) You shall maintain a carbon adsorption maintenance log at the site. Such maintenance log shall include, but shall not be limited to, (i) a description of the method of monitoring the concentration level of organic compounds in the exhaust vent stream; (ii) a description of the method of determining carbon breakthrough; (iii) results of the daily monitoring activities; (iv) description of the monitoring device and procedures, along with the manufacturers specifications; (v) results of calibration, inspection, and maintenance of the monitoring detector; (vi) written documentation of each determination that carbon breakthrough had been achieved and the data on which such determination relied; (vii) the date of each carbon bed replacement, the amount of carbon removed and the amount of carbon added; (viii) for each time carbon is removed from the carbon adsorption system, an adequate description of the method of disposal and/or regeneration of the spent carbons; and (ix) any other inspection and maintenance records. The log shall be maintained as part of the facility operating record.

III.D.3.f All carbon that is removed from the carbon adsorption system after use shall be managed in accordance with the requirements of 40 CFR §§ 264.1087(c)(3)(ii) and 264.1033(n). You shall prepare and maintain records sufficient to demonstrate that the requirements of this provision are satisfied as part of the facility operating record.

III.D.3.g The closed vent system shall not include any bypass devices that could be used to divert the gas or vapor stream to the atmosphere before entering the control device, unless equipped with either a flow indicator or a seal or locking device specified in 40 CFR § 264.1087(b)(3).



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III.D.3.b The vent system shall have an exhaust fan with a sufficient capacity to maintain a negative pressure inside enclosure room. You shall determine an appropriate minimum fan capacity determined from a written design analysis or from a performance test. You shall maintain such a minimum fan capacity while the shredder #1 is in operation. In addition, you shall maintain as part of the facility operating records either the written design analysis, or a written performance test plan and all test results.

III.D.3.i You shall inspect, monitor, and maintain the closed vent system in accordance with 40 CFR §§ 264.1087(b)(4), 1033(l), and 1087(c)(7). You shall inspect, monitor, and maintain the carbon adsorption system in accordance with the requirements in 40 CFR §§ 264.1084(b)(4) and 1087(c)(7). You shall develop and implement a written plan and schedule to perform the inspections and monitoring required by this paragraph. You shall incorporate this plan and schedule into any inspection plan required by the State RCRA permit. (40 CFR § 264.1088).

III.D.4 The compactor located outside of the enclosure room and its associated entry duct that opens into the enclosure room and receives shredded metal and other waste from the conveyor, shall comply with the following requirements:

III.D.4.a Each opening in the compactor or the entry duct shall be fitted with a door, cover, cap, hatch, lid, plug, seal, valve, or other type of fitting that blocks the opening. Each such fitting shall be secured in the closed position at all times while the shredder #1 is in operation. Such devices shall remain in the closed position until all gases, vapors, and fumes from hazardous waste that are present in the compactor and entry duct as a result of shredder operations or transfer of shredder waste to the compactor have been vented from the compactor and entry duct into the enclosure room, through the closed vent system and to the control device.

III.D.5 You shall repair each defect detected during an inspection performed in accordance with Condition III.D.3.i, according to requirements specified in 40 CFR § 264.1084(k) and 40 CFR § 264.1087(c)(7).

III.E RECORDKEEPING AND REPORTING REQUIREMENTS

III.E.1 You must prepare and maintain records for shredder #1 and the bottom container in the same manner as required for tanks under 40 CFR § 264.1089, including but not limited to 40 CFR § 264.1089(a), (b)(1) and (2)(iv). You must prepare and maintain records for the enclosure room (functioning as an enclosure as described in 40 CFR




Final Permit
October 2009

OHD 083 377 010
Page 20 of 20

§ 264.1084(i)), the closed vent system, and the carbon adsorption system described in this Section III in the manner described in 40 CFR § 264.1089, including 40 CFR §§ 264.1089(a), (b)(2)(iv), and (e).

III.E.2 You must comply with all reporting requirements for the carbon adsorption system under 40 CFR § 264.1090(c) and (d). Such reports shall be sent to the EPA (at the address specified in Condition I.G). You must also report to the EPA (at the address specified in Condition I.G) each occurrence when hazardous waste is managed in shredder #1 or in the enclosure room in noncompliance with the conditions specified in Section III.D of this permit, in the manner specified in 40 CFR § 264.1090(b).



		ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY																	
<p>This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.</p>																			
EPA I.D. NUMBER	➔	<table border="1"><tr><td colspan="2">OH0083377010</td><td colspan="2">REACKNOWLEDGEMENT</td></tr><tr><td colspan="4">ENVIRONMENTAL ENTERPRISES INCORPORA</td></tr><tr><td colspan="4">10147 SPRINGFIELD PIKE</td></tr><tr><td colspan="2">CINCINNATI</td><td>Oh</td><td>45215</td></tr></table>		OH0083377010		REACKNOWLEDGEMENT		ENVIRONMENTAL ENTERPRISES INCORPORA				10147 SPRINGFIELD PIKE				CINCINNATI		Oh	45215
OH0083377010		REACKNOWLEDGEMENT																	
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INSTALLATION ADDRESS	➔	<table border="1"><tr><td colspan="2">4650 SPRING GROVE AVE</td><td colspan="2"></td></tr><tr><td colspan="2">CINCINNATI</td><td>OH</td><td>45232</td></tr></table>		4650 SPRING GROVE AVE				CINCINNATI		OH	45232								
4650 SPRING GROVE AVE																			
CINCINNATI		OH	45232																

EPA Form 8700-12A (4-80)



RECEIVED NOV 26 1990



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
234 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60644

NOV 21 1990

REPLY TO THE ATTENTION OF
5SPT-7

Gary M. Davis
Environmental Enterprises, Inc.
4650 Spring Grove Avenue
Cincinnati, Ohio 45232

Dear Mr. Davis:

This letter serves as an acknowledgement that the U.S. Environmental Protection Agency (U.S. EPA), Region V has received your application for a PCB Commercial Storage Approval. A preliminary review of the application indicates that the application is complete, and that the information required by 40 C.F.R. Part 761.65(d) has been provided.

Therefore, the interim status granted on February 5, 1990, to continue operations at the Environmental Enterprises, Inc. facility at 4650 Spring Grove Avenue in Cincinnati, Ohio remains in force pending U.S. EPA's final action on your application. A more thorough technical review of the application will now be conducted. During that review, you may be required to submit supplemental information necessary to demonstrate that your facility should receive final approval. The submission of any supplemental data should be made in a timely manner, as the availability of this information may have an impact on your request for an approval.

If you have any questions, please contact Anton Martig of my staff at (312) 353-2291.

Sincerely,


John Connell, Chief
PCB Control Section



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

IN THE MATTER OF:)	APPROVAL TO COMMERCIALY
ENVIRONMENTAL ENTERPRISES, INC.)	STORE POLYCHLORINATED
CINCINNATI, OHIO)	BIPEENYLS (PCBs)

AUTHORITY

This approval is issued pursuant to Section 6(e)(1) of the Toxic Substances Control Act of 1976, Public Law No. 94-469, and the Federal PCB regulations, 40 CFR § 761.65(d).

BACKGROUND

Section 6(e)(1) of the Toxic Substances Control Act (TSCA) requires that the United States Environmental Protection Agency (U.S. EPA) promulgate rules for the disposal of PCBs. Rules implementing TSCA Section 6(e) were published in the May 31, 1979, Federal Register (44 FR 31542) and recodified in the May 6, 1982, Federal Register (47 FR 19527). Those rules also regulated the storage of PCB waste prior to disposal under the TSCA Section 6(e)(1) disposal authority for PCBs. Amendments to those rules were published in the December 21, 1989, Federal Register (54 FR 52746).

The current rules for PCB storage facilities are codified at 40 CFR § 761.65, Storage for Disposal. Those rules require, among other things, that facilities which store PCB waste generated by others, in quantities greater than 500 gallons, obtain a U.S. EPA approval. The December 21, 1989, Federal Register designated the U.S. EPA Regional Administrator of the region in which the storage facility is located (or the Director, Chemical Management Division [CMD], if the commercial storage area is ancillary to a facility approved for disposal by the Director, CMD) as the approval authority for commercial PCB storage facilities.

Environmental Enterprises, Inc. (EEI) is engaged in the storage of PCB waste and PCB Articles generated by others, in quantities greater than 500 gallons, at its facility in Cincinnati, Ohio. On February 5, 1990, the U.S. EPA granted EEI an interim approval to commercially store PCB waste. A commercial PCB storage approval application (application) was originally submitted to the U.S. EPA on August 2, 1990. Upon receipt of EEI's complete application, the February 5, 1990 interim approval was extended until the Regional Administrator made a final decision on the storage application.



2

After a technical adequacy review of the application, the U.S. EPA sent a Notice of Deficiencies (NOD) to EEI on June 26, 1991, notifying EEI of deficiencies in the application. In response to the NOD, the facility submitted a revised application on October 4, 1991. As a result of further review of the revised application, another NOD was sent by the U.S. EPA to the facility on February 8, 1995. The U.S. EPA received a response to the NOD from EEI on July 5, 1995. The U.S. EPA has determined that the final revised application is in compliance with the regulatory requirements, outlined at 40 CFR § 761.65, Storage for Disposal.

APPLICABLE REGULATIONS

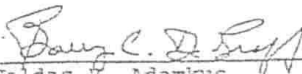
The conditions of this approval were developed in accordance with the applicable provisions of 40 CFR Part 761 and the October 18, 1989, TSCA Guidance Manual for Commercial PCB Storage Facility Applications.

APPROVAL

Approval is hereby granted to EEI, 4600 Spring Grove Avenue, Cincinnati, Ohio, at latitude North 39° 9' 10" and longitude West 84° 30' 45", to commercially store PCBs and PCB items for disposal, subject to the Approval Conditions stated herein, and based on the information described in the application.

This approval shall become effective on the date of signature and shall expire ten (10) years from the date of signature, unless revoked, suspended, or terminated in accordance with the Approval Conditions stated herein.

This approval does not relieve EEI from compliance with all applicable Federal, State and local regulatory requirements, including the Federal PCB regulations at 40 CFR Part 761.


Valdas V. Adamkus
Regional Administrator

9/21/95
Date



State of Ohio Environmental Protection Agency

401 East Fifth Street
Dayton, Ohio 45402-2911

Southwest District
TELE (937) 633-6267 FAX (937) 633-6243
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Konecki, Director

CERTIFIED MAIL

February 11, 2008

Mr. Daniel McCabe, President
Environmental Enterprises, Inc.
4650 Spring Grove Avenue
Cincinnati, Ohio 45232

Re: Class 1A - Approval - Metals Recovery Operation
Hazardous Waste Permit Modification - Tracking Number 012208-1A-1
U.S. EPA ID OHD083377010/Ohio Permit 05-31-0466

Dear Mr. McCabe:

On January 22, 2008, Ohio EPA received a request for a Class 1A (Class 1 requiring prior approval) hazardous waste permit modification from Environmental Enterprises, Inc. This modification was assigned a Permit Information Tracking System (PITS) ID number of 012208-1A-1. With this letter, Ohio EPA approves the above referenced Class 1A modification submitted pursuant to Ohio Administrative Code (OAC) Rule 3745-50-51 and has updated our records accordingly.

FOR APPROVAL

The following modification has been made to your Ohio Hazardous Waste Facility Installation and Operation Permit application:

A description has been added for a Metals Recovery operation in the former Boiler Room of the Annex portion of the facility, now being referred to as the Metal Recovery Room. This recycling process is exempt from RCRA regulation as a treatment unit subject to permitting authority. Activities associated with operation of this unit are subject to the rule requirements within OAC 3745-266-70. All wastes or materials treated in this unit will contain a recoverable amount of metal for reclamation.

Printed on Recycled Paper

Ohio EPA is an Equal Opportunity Employer

Printed in-house



Mr. Daniel McCabe
February 11, 2008
Page 2

If you have any questions, please contact Tom Koch at the Ohio EPA Southwest District Office.

Sincerely,

Thomas A. Winston, P.E.
District Chief,
Southwest District Office

cc: Dave Sholtis, DHWM/CO
Jeremy Carroll, Supervisor, Engineering Unit, DHWM/CO
Harold O'Connell, Tom Koch, File, DHWM/SWDO

TAW/TEK/rif



<input type="checkbox"/> CHECK IF CONFIDENTIAL INFORMATION INCLUDED IN APPLICATION	
OHIO ENVIRONMENTAL PROTECTION AGENCY Division of Hazardous Waste Management <i>Hazardous Waste Permit Modification Worksheet</i>	
PITS Tracking Number:	012208-1A-1
Facility Name:	Environmental Enterprises, Inc.
US EPA ID Number:	OHD083377010
Ohio ID Number:	05-31-0466
Date modification received by DHWM-CO (Day 0):	01-22-08
Description of change: Description and information for metals reclamation operation.	
DO Reviewer: Tom Koch	
CO Co-Reviewer (if applicable):	
Modification Classification (check one):	Classification Method (check one):
<input type="checkbox"/> Class 1 self implementing	<input checked="" type="checkbox"/> Classification determined by Director
<input checked="" type="checkbox"/> Class 1A with Directors prior approval	<input type="checkbox"/> Listed in Appendix to OAC Rule 3745-50-51
<input type="checkbox"/> Class 2	Appendix Listing:
<input type="checkbox"/> Class 3A	<input type="checkbox"/> Not listed in Appendix, submitted as Class 3 by facility
<input type="checkbox"/> Class 3B requiring siting criteria review	
For Class 2 Modifications	
Notice of later construction date: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable	
If Yes, date of notice to the facility:	
Date facility may begin construction:	
For Class 3B Modification	
<input type="checkbox"/> Yes <input type="checkbox"/> No	Does the modification request meet the siting criteria requirements?*
	*Note that siting criteria reviews for Class 3B Modification requests are conducted jointly between the DO and Co-EU
<input type="checkbox"/> Yes <input type="checkbox"/> No	Does the modification request meet the applicable rule requirements?**
	**See Administrative Checklists available on Haznet.
Proposed action on this modification: <input type="checkbox"/> Approval <input type="checkbox"/> Denial (For signatory use the Directors Sign-off Sheet.)	
Comments:	
c:\na\m\RA 115501_1.wpd	

THE UNIVERSITY OF CHICAGO PRESS



10018113, 2/001651

1-6 ENVIRONMENTAL ENTERPRISES INC
 333/656 4650 SPRING GROVE AVE.
 CINCINNATI, OH 45232-0000



DEA REGISTRATION NUMBER	THIS REGISTRATION EXPIRES	FEE PAID
RE0478746	08-31-2017	\$1523
SCHEDULES	BUSINESS ACTIVITY	ISSUE DATE
2,2N, 3,3N,4,5,	REVERSE DISTRIB-COLLECTOR	08-09-2016
ENVIRONMENTAL ENTERPRISES INC 4650 SPRING GROVE AVE. CINCINNATI, OH 45232-0000		

CONTROLLED SUBSTANCE REGISTRATION CERTIFICATE
 UNITED STATES DEPARTMENT OF JUSTICE
 DRUG ENFORCEMENT ADMINISTRATION
 WASHINGTON D.C. 20537

Sections 304 and 1008 (21 USC 824 and 958) of the Controlled Substances Act of 1970, as amended, provide that the Attorney General may revoke or suspend a registration to manufacture, distribute, dispense, import or export a controlled substance.

THIS CERTIFICATE IS NOT TRANSFERABLE ON CHANGE OF OWNERSHIP, CONTROL, LOCATION, OR BUSINESS ACTIVITY, AND IT IS NOT VALID AFTER THE EXPIRATION DATE.

Form DEA-223 (4/07)

DEA REGISTRATION NUMBER	THIS REGISTRATION EXPIRES	FEE PAID
RE0478746	08-31-2017	\$1523
SCHEDULES	BUSINESS ACTIVITY	ISSUE DATE
2,2N, 3,3N,4,5,	REVERSE DISTRIB-COLLECTOR	08-09-2016
ENVIRONMENTAL ENTERPRISES INC 4650 SPRING GROVE AVE. CINCINNATI, OH 45232-0000		

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State of Ohio
STATE BOARD OF PHARMACY

77 South High Street, Room 1702; Columbus, Ohio 43215-6126 TEL: 614/466-4143 FAX: 614/752-4836 EML: licensing@bop.ohio.gov
Be it known that the **TERMINAL DISTRIBUTOR OF DANGEROUS DRUGS** named below has given satisfactory evidence that all statutory requirements (ORC Sections 4729.54 & 4729.55) have been met, is duly licensed, and is entitled to conduct business in the state of Ohio until the expiration date of **MARCH 31, 2017**.

Identification Number: DIF.020888700-03

RESPONSIBLE PERSON:
DANIEL J. MCCABE PRES

ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE AVENUE
CINCINNATI, OH 45232

SIGNATURE OF RESPONSIBLE PERSON

Any change of responsible person must be reported within 30 days on a "Notification of Change of Responsible Person" form.
Before change of name, address, or ownership, immediately notify the Licensing Department of the State Board of Pharmacy.
These forms are available @ <http://pharmacy.ohio.gov/Licensing/TDDD.aspx>

CLASS: Disposal / Incineration Facility - Category Three
SIGN AND KEEP IN A READILY RETRIEVABLE LOCATION AT THIS ADDRESS

IF OHIO DRUG CATEGORY IS LIMITED, THIS LICENSE IS
INVALID IF NOT ACCOMPANIED BY AN OFFICIAL DRUG LIST
ADDENDUM WHICH CAN BE ACCESSED VIA THE WEB AT
[HTTP://PHARMACY.OHIO.GOV/Licensing/DrugListLookup.aspx](http://PHARMACY.OHIO.GOV/Licensing/DrugListLookup.aspx)

(KEEP THIS SECTION FOR FUTURE REFERENCE)

General Information

If the Ohio Drug Category of this license is LIMITED, the licensee may only purchase & store dangerous drugs named on an official drug list addendum. This is a separate document. A copy of this list must be sent with a copy of the Certificate of Licensure as a Terminal Distributor of Dangerous Drugs (TDDD) in response to a wholesaler request for this information. Note: Each time you revise your drug list, even if adding just one drug, you must re-submit your ENTIRE list.

For more information go to: <http://www.pharmacy.ohio.gov/Licensing/DrugList.aspx>

Any change of responsible person must be reported within 30 days, and an inventory of all controlled substances shall be taken at the time of change with the new responsible person. **Non-Resident Pharmacies must also submit an official verification from your state board of pharmacy for your pharmacist license.**

For more information go to: <https://www.pharmacy.ohio.gov/Licensing/TDDD.aspx>

A **CHANGE** in business name, address, ownership, or category requires **RE-APPLICATION & FEE**. In the event of an address change, **notify** the Board of Pharmacy **BEFORE** moving any dangerous drugs. [Sections 4729.51 and 4729.54, O.R.C.; Rule 4729-9-08, O.A.C.]

For more information go to: <https://www.pharmacy.ohio.gov/Licensing/TDDD.aspx>

Notify the Board of Pharmacy **in writing 14 days prior to discontinuing business**, whether closing or selling. Written notice [Discontinuing Business form is available at the link below] and state license must be mailed (return receipt requested) or hand delivered to the Board office. [Section 4729.62 O.R.C.; Rule 4729-9-07, O.A.C.]

For more information go to: <https://www.pharmacy.ohio.gov/Licensing/TDDD.aspx>

Notify the Board of Pharmacy of **any new facilities, work or storage areas to be constructed or utilized for dangerous drugs, or any changes in operation of the registrant before** being used or implemented. [Rule 4729-9-05, O.A.C.]

All communications will be done through EMAIL- NOT MAILINGS. Please go to the following webpage to provide the email address that you wish to receive these communications: <https://pharmacy.ohio.gov/UpdateEmailAddress.aspx>

In order to enter your email address in the webpage mentioned above, you will need your login information, which is below.

User ID: 3935037
Password: 35970
Current Email on File: mjoering@eeienv.com

If you have problems or concerns, please feel free to contact the Board office utilizing the "CONTACT THE BOARD" selection along the left



Any change of information must be submitted within 30 days to:

Bureau of Testing & Registration
PO BOX 529
Reynoldsburg, Ohio 43068
614-752-7126
614-995-4206 (fax)
webfmtr@com.state.oh.us

Issued permits shall be kept on the premises at all times and shall be readily available for inspection by the fire code official.

JOHN R KASICH
Governor

State of Ohio
Department of Commerce
Division of State Fire Marshal

JACQUELINE T. WILLIAMS
Director

2016 Explosive Annual Renewal Permit

This permit was issued in accordance with Ohio Administrative Code(s)
1301:7-7-01(E)(1)(a) OFC 105.1.1.1.1 and 1301:7-7-33(A)(2) OFC 3301.2

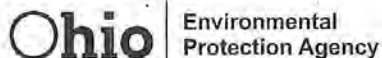
86.31.1015
ENVIRONMENTAL ENTERPRISES INC
4650 SPRING GROVE AVE
CINCINNATI, OH 45232-1920

Expiration Date: **07/01/2017**



Ohio Department of Commerce
Division of State Fire Marshal
Bureau of Testing & Registration
8895 E Main Street, PO Box 529
Reynoldsburg, Ohio 43068

ENVIRONMENTAL ENTERPRISES INC
4650 SPRING GROVE AVE
CINCINNATI, OH 45232



Final Permit-to-Install and Operate
ENVIRONMENTAL ENTERPRISES
Permit Number: P0108259
Facility ID: 1431072690
Effective Date: 6/28/2011

Authorization

Facility ID: 1431072690
Application Number(s): A0042053
Permit Number: P0108259
Permit Description: Chapter 31 modification of a non-aerosol shredder (P002).
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$1,000.00
Issue Date: 6/28/2011
Effective Date: 6/28/2011
Expiration Date: 5/6/2019
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

ENVIRONMENTAL ENTERPRISES
4650 SPRING GROVE
Cincinnati, OH 45232

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

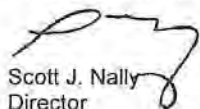
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Final Permit-to-Install and Operate
ENVIRONMENTAL ENTERPRISES

Permit Number: P0108259

Facility ID: 1431072690

Effective Date: 6/28/2011

Authorization (continued)

Permit Number: P0108259

Permit Description: Chapter 31 modification of a non-aerosol shredder (P002).

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P002
Company Equipment ID:	Non-Aerosol Shredder
Superseded Permit Number:	14-03398
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
ENVIRONMENTAL ENTERPRISES
Permit Number: P0108128
Facility ID: 1431072690
Effective Date: 5/23/2011

Authorization

Facility ID: 1431072690
Application Number(s): A0041898
Permit Number: P0108128
Permit Description: Renewal of non-hazardous shredder
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 5/23/2011
Effective Date: 5/23/2011
Expiration Date: 5/6/2019
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

ENVIRONMENTAL ENTERPRISES
4650 SPRING GROVE
Cincinnati, OH 45232

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

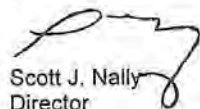
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

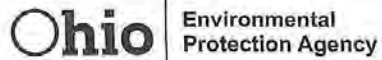
Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Final Permit-to-Install and Operate
ENVIRONMENTAL ENTERPRISES
Permit Number: P0108128
Facility ID: 1431072690
Effective Date: 5/23/2011

Authorization (continued)

Permit Number: P0108128
Permit Description: Renewal of non-hazardous shredder

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P005
Company Equipment ID:	Non-Hazardous Waste Shredder
Superseded Permit Number:	P0098585
General Permit Category and Type:	Not Applicable



Environmental
Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

6/3/2011

DANIEL MCCABE
ENVIRONMENTAL ENTERPRISES
10163 CINCINNATI-DAYTON RD
CINCINNATI, OH 45241

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1431072690
Permit Number: P0107781
Permit Type: Renewal
County: Hamilton

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Hamilton County Dept. of Environmental Services at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: HCDOES

50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

614 | 644 3020
614 | 644 3184 (fax)
www.epa.ohio.gov



Environmental
Protection Agency

Final Permit-to-Install and Operate

ENVIRONMENTAL ENTERPRISES

Permit Number: P0107781

Facility ID: 1431072690

Effective Date: 6/3/2011

Authorization

Facility ID: 1431072690

Application Number(s): A0041363

Permit Number: P0107781

Permit Description: Renewal PTIO permit for P006 -Treatment Tank #1 first permitted under PTI 14-2773 issued 9/17/97.

Permit Type: Renewal

Permit Fee: \$0.00

Issue Date: 6/3/2011

Effective Date: 6/3/2011

Expiration Date: 5/6/2019

Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

ENVIRONMENTAL ENTERPRISES
4650 SPRING GROVE
Cincinnati, OH 45232

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Environmental
Protection Agency

Final Permit-to-Install and Operate

ENVIRONMENTAL ENTERPRISES

Permit Number: P0107781

Facility ID: 1431072690

Effective Date: 6/3/2011

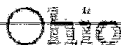
Authorization (continued)

Permit Number: P0107781

Permit Description: Renewal PTIO permit for P006 -Treatment Tank #1 first permitted under PTI 14-2773 issued 9/17/97.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P006
Company Equipment ID:	Hazardous Waste Tank with Scrubber
Superseded Permit Number:	P0098586
General Permit Category and Type:	Not Applicable



Environmental
Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

6/3/2011

DANIEL MCCABE
ENVIRONMENTAL ENTERPRISES
10163 CINCINNATI-DAYTON RD
CINCINNATI, OH 45241

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1431072690
Permit Number: P0107792
Permit Type: Renewal
County: Hamilton

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Hamilton County Dept. of Environmental Services at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: HCD OES

50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

614 | 644 3020
614 | 644 3184 (fax)
www.epa.ohio.gov



Environmental
Protection Agency

Final Permit-to-Install and Operate

ENVIRONMENTAL ENTERPRISES

Permit Number: P0107792

Facility ID: 1431072690

Effective Date: 6/3/2011

Authorization

Facility ID: 1431072690

Application Number(s): A0041364

Permit Number: P0107792

Permit Description: Renewal PTIO permit for P007-Treatment Tank #2 first permitted under PTI 14-2773 issued 9/17/97.

Permit Type: Renewal

Permit Fee: \$0.00

Issue Date: 6/3/2011

Effective Date: 6/3/2011

Expiration Date: 5/6/2019

Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

ENVIRONMENTAL ENTERPRISES
4650 SPRING GROVE
Cincinnati, OH 45232

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

A handwritten signature in black ink, appearing to read 'Scott J. Nally'.

Scott J. Nally
Director



Environmental
Protection Agency

Final Permit-to-Install and Operate

ENVIRONMENTAL ENTERPRISES

Permit Number: P0107792

Facility ID: 1431072690

Effective Date: 6/3/2011

Authorization (continued)

Permit Number: P0107792

Permit Description: Renewal PTIO permit for P007-Treatment Tank #2 first permitted under PTI 14-2773 issued 9/17/97.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P007
Company Equipment ID:	Hazardous Waste Tank with Scrubber
Superseded Permit Number:	P0098589
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate
Permit Number: P0104825
Facility ID: 1431072690
Effective Date: 5/6/2009

Authorization

Facility ID: 1431072690
Application Number(s): A0037431
Permit Number: P0104825
Permit Description: Aerosol Can Crusher
Permit Type: Initial Installation
Permit Fee: \$1,500.00
Issue Date: 5/6/2009
Effective Date: 5/6/2009
Expiration Date: 5/6/2019
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

ENVIRONMENTAL ENTERPRISES
4650 SPRING GROVE
CINCINNATI, OH 45232

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

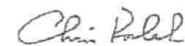
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate
Permit Number: P0104825
Facility ID: 1431072690
Effective Date: 5/6/2009

Authorization (continued)

Permit Number: P0104825
Permit Description: Aerosol Can Crusher

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

Emissions Unit ID:	P013
Company Equipment ID:	Can Crusher
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
ENVIRONMENTAL ENTERPRISES
Permit Number: P0118621
Facility ID: 1431072690
Effective Date: 4/10/2015

Authorization

Facility ID: 1431072690
Application Number(s): A0053047
Permit Number: P0118621
Permit Description: Installation of a new aerosol can crushing process.
Permit Type: Initial Installation
Permit Fee: \$500.00
Issue Date: 4/10/2015
Effective Date: 4/10/2015
Expiration Date: 5/6/2019
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

ENVIRONMENTAL ENTERPRISES
4650 SPRING GROVE
Cincinnati, OH 45232

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

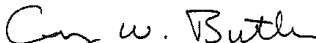
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Final Permit-to-Install and Operate
ENVIRONMENTAL ENTERPRISES
Permit Number: P0118621
Facility ID: 1431072690
Effective Date: 4/10/2015

Authorization (continued)

Permit Number: P0118621
Permit Description: Installation of a new aerosol can crushing process.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P015
Company Equipment ID:	Can Crusher #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



NOTICE OF REGISTRATION

40

TO:
ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE AVENUE
CINCINNATI OHIO 45232

RECEIVED - SWD AIR
POLLUTION CONTROL

JUN 7 1993

FOR:

APPLICATION NO	1431072690 P009
EQUIPMENT DESCRIPTION	LAB HOOD #1 - FLASH POINT ANALYSIS
COMPANY ID	LAB HOOD #1
ISSUE DATE	06/11/93
EFFECTIVE DATE	06/11/93

(SEE ENCLOSED LETTER FOR EXPLANATION)

Donald R. Schryver

DIRECTOR



NOTICE OF REGISTRATION

40

TO:
ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE AVENUE
CINCINNATI OHIO 45232

RECEIVED - CYG AIR
POLLUTION CONTROL

JUN 7 1993

FOR:

APPLICATION NO 1431072690 P010
EQUIPMENT DESCRIPTION LAB HOOD #2 - CYANIDE ANALYSIS
COMPANY ID LAB HOOD #2
ISSUE DATE 06/11/93
EFFECTIVE DATE 06/11/93

(SEE ENCLOSED LETTER FOR EXPLANATION)

Donald R. Schuyardus

DIRECTOR



NOTICE OF REGISTRATION

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TO:
ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE AVENUE
CINCINNATI OHIO 45232

RECEIVED - SWD AIR
POLLUTION CONTROL

7 1993

FOR:

APPLICATION NO 1431072690 P011
EQUIPMENT DESCRIPTION LAB HOOD #3 - CYANIDE ANALYSIS
COMPANY ID LAB HOOD #3
ISSUE DATE 06/11/93
EFFECTIVE DATE 06/11/93

(SEE ENCLOSED LETTER FOR EXPLANATION)

Donald R. Schryver

DIRECTOR



NOTICE OF REGISTRATION

40

TO: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE AVENUE
CINCINNATI OHIO 45232

RECEIVED

AUG 7 1995

Hamilton County Department
of Environmental Services

FOR:

APPLICATION NO 1431072690 T001
EQUIPMENT DESCRIPTION 4000 GALLON WASTE OIL STORAGE TANK
COMPANY ID HAMILTON TANK
ISSUE DATE 08/04/95
EFFECTIVE DATE 08/04/95

(SEE ENCLOSED LETTER FOR EXPLANATION)

Donald R. Schreyer

DIRECTOR



NOTICE OF REGISTRATION

40

TO:
ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE AVENUE
CINCINNATI OHIO 45232

RECEIVED - SWD AIN
POLLUTION CONTROL

SEP 16 1993

FOR:

APPLICATION NO	1431072690 P008
EQUIPMENT DESCRIPTION	SOLIDIFICATION PROCESS W/ROTOCLONE
COMPANY ID	SOLIDIFICATION MIXER
ISSUE DATE	09/16/93
EFFECTIVE DATE	09/16/93

(SEE ENCLOSED LETTER FOR EXPLANATION)

Donald R. Schryver

DIRECTOR



NOTICE OF REGISTRATION

40

TO:
ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE AVENUE
CINCINNATI OHIO 45232

RECEIVED - SWD AIR
POLLUTION CONTROL

FEB 7 1986

FOR:
APPLICATION NO 1431072690 P003
EQUIPMENT DESCRIPTION WATER REACTIVE REACTOR
COMPANY ID WATER REACTIVE REACTOR
ISSUE DATE 01/24/86
EFFECTIVE DATE 01/24/86

(SEE ENCLOSED LETTER FOR EXPLANATION)

DIRECTOR



OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit to Install

Application No. 05-2585

Applicant's Name: Environmental Enterprises

Permit Fee \$50.00

Address: 4650 Spring Grove Avenue

City: Cincinnati

State: Ohio 45232

Person to Contact: Gary Davis

Telephone: (513) 541-1823

Description of Proposed Source: Pretreatment - Sludge Filter Press

Issuance Date: January 28, 1988

Effective Date: January 28, 1988

The above named entity is hereby granted a permit to install for the above described source pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described source of pollutants will be granted the necessary operating permits. This permit is granted subject to the following conditions attached hereto:!

Ohio Environmental Protection Agency

Richard L. Shank, Ph.D.
Director
P. O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

Page 44 of 98



WASTEWATER DISCHARGE PERMIT

Permittee: Environmental Enterprises, Inc.

Address: 4650 Spring Grove Avenue
Cincinnati OH 45232

MSD Permit Number: SIU-42
Effective Date: 01/01/2016
Expiration Date: 12/31/2020

In accordance with the provisions of Article XV, Rules and Regulations of the Metropolitan Sewer District of Greater Cincinnati, Hamilton County, Ohio (known hereinafter as "MSD"), the Permittee is authorized to discharge into the Wastewater Treatment System of MSD subject to the conditions set forth herein.

Issuance of this permit does not constitute expressed or implied approval or permission for a violation of any provision of MSD Rules and Regulations, nor does issuance constitute a waiver by the Department of Sewers, City of Cincinnati, or the Board of County Commissioners of Hamilton County, Ohio, of the right to seek any lawful remedy or penalty for any such violation.

In case the permit makes reference to, or includes in its terms, a plan for pretreating wastewater before its discharge into the Wastewater Treatment System, the issuance of the permit shall not constitute expressed or implied agreement or guarantee that the pretreatment facility constructed in accordance with said plan will operate as intended or in compliance with applicable MSD Rules and Regulations, or that the wastewater so pretreated will be acceptable for discharge to the Wastewater Treatment System.

This permit may be modified by MSD, as required or authorized by MSD Rules and Regulations, or as required by the Federal Government or agencies thereof.

Failure on the part of the Permittee to fulfill any of the specified conditions shall be sufficient cause for immediate revocation of this permit. This permit is further subject to termination upon thirty (30) days written notice to the Permittee by an authorized representative of MSD.

Violations of this permit are punishable by civil penalties of up to \$10,000 per violation and by criminal penalties of up to \$25,000 per violation or six months in prison or both.

This Permit is transferrable only as specified in Section 1505.5 of the MSD Rules and Regulations.



Interim Superintendent
Regulatory Compliance and Safety Division



Director



PERMIT CONDITIONS

1. The Permittee shall comply with the MSD Rules and Regulations or with federal regulations if more stringent. (Sections 204 and 402)
2. The Permittee shall allow MSD and any accompanying EPA personnel access to the premises for inspection or sampling related to conditions of this permit. (Sections 201 and 1507.1)
3. The Permittee shall promptly report to MSD any changes in locations, ownership, industrial processes, access procedures, discharges (quantity or quality), or chemical storage procedures. (Sections 1505.2 and 1505.6)
4. The Permittee shall notify MSD immediately in the event of any accident, negligence, fire, flood, watermain break or other occurrence having a reasonable probability of causing a discharge or interference to the public sewer system or other connected conveyance. Notifications shall be made immediately by telephoning MSD at 513-557-7000, 8:00 a.m. to 4:30 p.m., Monday through Friday and 513-352-4900 at all other times, and shall include a description of the manner in which discharges in violation of this permit will be prevented including ceasing industrial discharges if necessary. Within five days of the date of any such occurrence, a detailed written statement describing the causes of the discharge and the measures being taken to prevent its future occurrence shall be submitted by the Permittee to MSD, addressed to The Metropolitan Sewer District, Industrial Waste Section, 1600 Gest Street, Cincinnati, Ohio 45204. (Section 1506.6)
5. The Permittee shall discharge wastewater in conformance with the information contained in the permit application, stormwater management plan, toxic organic management plan, Best Management Practices, and Accidental Discharge/Slug Discharge control plan on file with MSD.
6. The Permittee shall retain and preserve for no less than five (5) years, any records, books, documents, memoranda, reports, correspondence, and any and all summaries thereof, relating to monitoring, sampling, and chemical analyses made by or on behalf of said Permittee. (Sections 409 and 1506.13)
7. When the Permittee's monitoring of its wastewater discharge discloses a violation, the Permittee must notify MSD Industrial Waste Section within 24-hours and within thirty (30) days shall submit to MSD in writing the results of repeat sampling and analysis. The 24-hour notification may be by telephone (513-557-7000) or email at msdviolations@cincinnati-oh.gov.
8. If the Permittee monitors its wastewater for any pollutant more often than is required by this Wastewater Discharge Permit, the results of the additional monitoring shall be included in the next periodic report to MSD.
9. Of the following permit conditions, only those marked with an "X" are applicable to the Permittee.
 - (X) The Permittee's discharge shall conform to the wastewater flows and characteristics listed in Attachment "A". (Section 1505.2)
 - (X) The Permittee shall perform the required monitoring and submit signed reports as described in Attachment "B". (Section 1505.2)



ATTACHMENT A

Permittee: Environmental Enterprises, Inc.

Address: 4650 Spring Grove Avenue
 Cincinnati OH 45232

MSD Permit Number: SIU-42
Effective Date: 01/01/2016
Expiration Date: 12/31/2020

The following limitations and conditions apply to the Permittee's effluent wastewater until such time as this Attachment is modified or revoked:

1. The Permittee shall maintain the **pH** of its wastewater discharged to the MSD sewer system within the range of 5 to 12.5 Standard Units at all times in compliance with Sections 1502.1 (B) of the Metropolitan Sewer District Rules and Regulations.
2. The Permittee shall not discharge to the MSD sewer system waste or wastewater that contains pollutants which create a fire or explosion hazard in the POTW, including, but not limited to, wastestreams with a **closed cup flashpoint** of less than 140 degrees Fahrenheit or 60 degrees Celsius using the test methods specified in 40 CFR 261.21.
3. The Permittee shall not discharge to the MSD sewer system any liquid or vapor having a temperature higher than 150 degrees Fahrenheit or which produces a **temperature** of 104 degrees Fahrenheit or greater in wastewater entering a wastewater treatment plant.
4. At no time shall the Permittee's discharge flow exceed the instantaneous practical flow rate capacity of the primary measuring device, sample location, building drain, building sewer, private sewer, public sewer or pump station servicing the facility.
5. **Facility Discharge Limits.** The Permittee shall not discharge to the MSD sewer system waste or wastewater with concentrations of pollutants that exceed the following values:

Sample Location	Pollutant	Daily Limit	Monthly Average	Required Sample Type	Sample Frequency	Report Frequency
42-02	Flow, Total	NA Gallon	NA	Continuous	Continuous	Semi-Annually
42-02	pH	5.0-12.5 S.U.	NA	Continuous	4 Days Semi-Annually	Violations Only
42-02	Oil & Grease (NonBio)	50.0 mg/L	NA	Grab	4 Days Semi-Annually	Semi-Annually
42-02	Antimony	0.249 mg/L	0.206 mg/L	Composite	4 Days Semi-Annually	Semi-Annually
42-02	Arsenic	0.162 mg/L	0.104 mg/L	Composite	4 Days Semi-Annually	Semi-Annually
42-02	Cadmium	0.474 mg/L	0.0962 mg/L	Composite	4 Days Semi-Annually	Semi-Annually
42-02	Chromium	0.947 mg/L	0.487 mg/L	Composite	4 Days Semi-Annually	Semi-Annually
42-02	Cobalt (T)	0.192 mg/L	0.124 mg/L	Composite	4 Days Semi-Annually	Semi-Annually
42-02	Copper	0.405 mg/L	0.301 mg/L	Composite	4 Days Semi-Annually	Semi-Annually



Hazardous Household Waste Collection Event Spring 2017
Lexington-Fayette Urban County Government - RFP#2-2017

Sample Location	Pollutant	Daily Limit	Monthly Average	Required Sample Type	Sample Frequency	Report Frequency
42-02	Lead	0.222 mg/L	0.172 mg/L	Composite	4 Days Semi-Annually	Semi-Annually
42-02	Mercury	0.00234 mg/L	0.000739 mg/L	Composite	4 Days Semi-Annually	Semi-Annually
42-02	Nickel	3.95 mg/L	1.45 mg/L	Composite	4 Days Semi-Annually	Semi-Annually
42-02	Silver	0.12 mg/L	0.0351 mg/L	Composite	4 Days Semi-Annually	Semi-Annually
42-02	Tin	0.409 mg/L	0.12 mg/L	Composite	4 Days Semi-Annually	Semi-Annually
42-02	Titanium	0.0947 mg/L	0.0618 mg/L	Composite	4 Days Semi-Annually	Semi-Annually
42-02	Vanadium (T)	0.218 mg/L	0.0662 mg/L	Composite	4 Days Semi-Annually	Semi-Annually
42-02	Zinc	2.87 mg/L	0.641 mg/L	Composite	4 Days Semi-Annually	Semi-Annually
42-02	Cyanide (Total)	15.0 mg/L	NA	Grab	4 Days Semi-Annually	Semi-Annually
42-02	Cyanide (Amenable)	3.0 mg/L	NA	Grab	4 Days Semi-Annually	Semi-Annually
42-02	Carbazole	0.392 mg/L	0.233 mg/L	Composite	4 Days Semi-Annually	Semi-Annually
42-02	n-Decane	5.79 mg/L	3.31 mg/L	Composite	4 Days Semi-Annually	Semi-Annually
42-02	2,4,6-Trichlorophenol	0.155 mg/L	0.106 mg/L	Composite	4 Days Semi-Annually	Semi-Annually
42-02	Bis(2-ethylhexyl)phthalate	0.267 mg/L	0.158 mg/L	Composite	4 Days Semi-Annually	Semi-Annually
42-02	Fluoranthene	0.787 mg/L	0.393 mg/L	Composite	4 Days Semi-Annually	Semi-Annually
42-02	n-Octadecane	1.22 mg/L	0.925 mg/L	Composite	4 Days Semi-Annually	Semi-Annually
42-02	o-Cresol	1.92 mg/L	0.561 mg/L	Composite	4 Days Semi-Annually	Semi-Annually
42-02	p-Cresol	0.698 mg/L	0.205 mg/L	Composite	4 Days Semi-Annually	Semi-Annually

SAMPLING LOCATION(S)

42-02

PROCESS FLOW: Northeast flume in pit within cage along front of building on Spring Grove Avenue.



ATTACHMENT B

Permittee: Environmental Enterprises, Inc.

Address: 4650 Spring Grove Avenue
Cincinnati OH 45232

MSD Permit Number: SIU-42
Effective Date: 01/01/2016
Expiration Date: 12/31/2020

The following provisions shall apply to the Permittee until such time as this Attachment is modified or revoked:

1. Permittees seeking renewal of a Wastewater Discharge Permit shall apply in writing between 60 to 90 days before the expiration date of the current permit. The application for renewal shall be submitted on the form provided by MSD and shall state significant changes in the quantity and quality of the wastewater or shall certify that there are no such significant changes. The Permittee shall submit this information to MSD Industrial Waste Section by certified or registered U.S. Mail.
2. In the event that the Permittee does not discharge during a reporting period, the Permittee shall submit a report on the MSD Periodic Compliance Report form certifying to MSD Industrial Waste Section that process discharges did not occur during the reporting period. This certification is in lieu of sampling and no other sampling, analysis or reports, as listed in Attachment A or Attachment B are required.
3. The Permittee shall timely pay all service charges, surcharges, sampling fees, permit fees and costs of any work required to clear and/or repair wastewater treatment works affected by the user's discharge or operations.
4. The Permittee shall not bypass its wastewater pretreatment system or approved sample location without prior notice to the MSD Industrial Waste Section. In the case of an unanticipated bypass the Permittee shall notify the Industrial Waste Section as soon as practical and within five (5) days submit a written description explaining its cause, duration, and steps taken to reduce, eliminate and prevent future bypasses. Approval of a bypass does not in any way prohibit the District from recovery of damages or assessment of penalties for violations.
5. The Permittee shall provide facilities and procedures for the protection of the wastewater treatment system from the accidental discharge of prohibited materials and slug discharges. The Permittee shall notify the District immediately of any accidental discharge or slug discharge. Notification may be made by telephone to 513-557-7000 during business hours or 513-352-4900 at all other times.



6. The Permittee shall perform periodic self-monitoring of its wastewater at the sampling location(s) defined in Attachment A of this permit according to the table specified in Attachment A, Item 5 of this permit by collecting data representative of the quality and quantity of its wastewater effluent. The Permittee shall submit this data to MSD Industrial Waste Section by certified or registered U.S. Mail within forty-five (45) days of the last day of the month in which the monitoring was performed. The Permittee shall use the enclosed MSD Periodic Compliance Report Form or an MSD approved facsimile. The monitoring report shall include:

- A. Wastewater flow rates for each 24-hour sampling period from each sampling location described in this Attachment.

- B. The chemical identities, concentrations, and methods of analysis of the regulated pollutants as listed in Item 4 of Attachment A of this permit and as required for periodic monitoring.

7. The Permittee shall use the applicable sampling and test procedures found in the most recent edition of the U.S. EPA, Code of Federal Regulations, Title 40, Part 136 (40 CFR 136).

8. Where applicable the Permittee shall periodically submit separate written reports of add and subtract meter readings and wastewater discharge volumes on the form provided by MSD for billing purposes to;

Metropolitan Sewer District
Division of Wastewater Administration/Accounting Section
1600 Gest Street
Cincinnati, Ohio 45204
Attention: Bryan Jones
Or by email to: Bryan.Jones@Cincinnati-OH.gov

The dates when the reports are due, and the reporting periods of the volumetric discharges, are normally specified on the billing notices from the Greater Cincinnati Water Works.

All reports shall contain detailed information and follow specific submitting instructions. These are outlined in the confirmation letter from the Division of Wastewater Administration after the meter installation is inspected.



9. Where applicable Permittees with approved effluent flow meters for billing purposes shall:
 - A. Record the flow rate using a 24-hour circular chart or an MSD approved alternative manner. After one complete year of operation, the Permittee at its discretion may record the flow rate using a circular paper chart on a seven-day interval,
 - B. The Permittee shall retain all electronic data associated with the each effluent flow meter in a readily retrievable manner by on-site personnel,
 - C. The Permittee shall check the accuracy of each effluent flow meter at least once each week and record the activity on the circular chart or in a separate log book,
 - D. The Permittee shall conduct an annual third party calibration of each effluent billing flow meter,
 - E. The Permittee shall physically and electronically secure each effluent billing flow meter to prevent tampering and unauthorized access to operation and calibration controls,
 - F. The Permittee must retain any and all documentation required by MSD and/or associated with the operation and maintenance of each effluent billing flow meter so that on any day the Permittee will have on hand and available for inspection said records for the previous five years.
10. The Permittee must notify MSD 48 hours prior to each and every batch discharge of process wastewater. Notification may be made to the Industrial Waste Section by email to MSDBatchDischarge@cincinnati-oh.gov, telephone to 513-557-7000 or by facsimile transmittal to 513-557-7050.
11. The Permittee must record the date, time, volume, pH and sampler's name for each and every batch discharge of process wastewater. These records must be on hand and immediately available to MSD personnel upon request.
12. Once during each calendar year the Permittee shall submit to the Metropolitan Sewer District a periodic certification statement that the Permittee is operating its treatment systems to provide equivalent treatment as set forth in Title 40 Code of Federal Regulations 437.41(b).
13. Once each calendar year the Permittee shall report to the Metropolitan Sewer District the results of analyzing representative samples for PCBs and pesticides. As an alternative to sampling for PCBs and pesticide pollutants, the Permittee may submit an annual written certification stating that no material having the PCB or pesticide pollutants were discharged during the previous twelve months.
14. Once during each calendar year the Permittee shall report to the Metropolitan Sewer District the results of analyzing representative samples of its wastewater to MSD for ionizing radiation (alpha, beta and gamma). As an alternative to monitoring for radiation pollutants, the Permittee may submit an annual written certification stating that no materials having the listed radiation pollutants above background levels were processed or discharged during the previous twelve months.



15. The Permittee shall characterize by laboratory analysis each new waste stream for compliance with the limits set forth in Attachment A, Item 5 of this permit. In the event that the laboratory characterization demonstrates levels above the allowable limits the Permittee shall develop and follow a treatment plan for this waste stream. The treatment plan for each waste stream shall be on hand and available for inspection.
16. The Permittee shall document each waste stream accepted for discharge to MSD in the Wastewater Discharge Permit Application on file with the Regulatory Compliance and Safety Division. In the event that additional waste streams are accepted, the Permittee shall amend the Wastewater Discharge Permit Application by means of written notice to the Regulatory Compliance and Safety Division. The notice, laboratory characterization and treatment plan shall be submitted prior to the date of discharge of the wastestream.



OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit to Install

Application No. 05-4660
Applicant's Name: Environmental Enterprises, Inc. Permit Fee \$100.00
Address: 4650 Spring Grove Avenue
City: Cincinnati State: Ohio 45232
Person to Contact: Mr. Gary Davis, Vice President
Telephone: (513) 541-1823
Description of Proposed Source: Modification to Install Additional Pretreatment Equipment, Cincinnati, Metropolitan Sewer District, Hamilton County

Issuance Date: December 12, 1991

Effective Date: December 12, 1991

The above named entity is hereby granted a permit to install for the above described source pursuant to Chapter 3745-37 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described source of pollutants will be granted the necessary operating permits. This permit is granted subject to the following conditions attached hereto:

Ohio Environmental Protection Agency

Donald R. Schregardus
Director
P. O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

Page 43 of 98



City of

Cincinnati

Cincinnati Fire Department
Permit

Permit Number: **FC20141646** **10/15/2014** Premise Address:
Fire Company: **E38** ENVIRONMENTAL ENTERPRISES INC.
Fire District: **D-3** 4650 SPRING GROVE AVENUE

To: **ENVIRONMENTAL ENTERPRISES INC.**
4650 SPRING GROVE AVENUE
CINCINNATI, OHIO 45232

PURSUANT TO THE PROVISIONS OF THE CINCINNATI FIRE PREVENTION CODE SECTION
105.6.08 THIS PERMIT IS GRANTED TO ENVIRONMENTAL ENTERPRISES INC.
FOR THE PURPOSE OF COMPRESSED GASES

STORAGE AND/OR HANDLING OF COMPRESSED
GASES 2400 CU FT/

~~THIS PERMIT EXPIRES 09/30/2015~~
~~FFS-2009-0001~~

This permit is used and accepted subject to all applicable provisions of the Cincinnati Fire Prevention Code now adopted, or
that may hereafter be adopted.
This permit does not take the place of any license required by law and is not transferable. Any change in the use or
occupancy of premises shall require a new permit.

Richard A. Braun
FIRE CHIEF

THE PERMIT MUST AT ALL TIMES BE POSTED ON THE PREMISES MENTIONED ABOVE



Cincinnati Fire Department
Permit

Permit Number: **FC20141647** **10/15/2014** Premise Address:
Fire Company: **E38** **ENVIRONMENTAL ENTERPRISES INC.**
Fire District: **D-3** **4650 SPRING GROVE AVENUE**

To: **ENVIRONMENTAL ENTERPRISES INC.**
4650 SPRING GROVE AVENUE
CINCINNATI, OHIO 45232

PURSUANT TO THE PROVISIONS OF THE CINCINNATI FIRE PREVENTION CODE SECTION
105.6.16 THIS PERMIT IS GRANTED TO ENVIRONMENTAL ENTERPRISES INC.
FOR THE PURPOSE OF FLAMMABLE AND COMBUSTIBLE LIQUIDS

STORAGE AND/OR HANDLING OF COMPRESSED
GASES 2400 CU FT/

THIS PERMIT EXPIRES 09/30/2015

This permit is used and accepted subject to all applicable provisions of the Cincinnati Fire Prevention Code now adopted, or
that may hereafter be adopted.
This permit does not take the place of any license required by law and is not transferable. Any change in the use or
occupancy of premises shall require a new permit.

Richard A. Brown
FIRE CHIEF

THE PERMIT MUST AT ALL TIMES BE POSTED ON THE PREMISES MENTIONED ABOVE



Cincinnati Fire Department
Permit

Permit Number: **FC20141648** **10/15/2014** Premise Address:
Fire Company: **E38** **ENVIRONMENTAL ENTERPRISES INC.**
Fire District: **D-3** **4650 SPRING GROVE AVENUE**

To: **ENVIRONMENTAL ENTERPRISES INC.**
4650 SPRING GROVE AVENUE
CINCINNATI, OHIO 45232

PURSUANT TO THE PROVISIONS OF THE CINCINNATI FIRE PREVENTION CODE SECTION
105.6.11 THIS PERMIT IS GRANTED TO ENVIRONMENTAL ENTERPRISES INC.
FOR THE PURPOSE OF CUTTING AND WELDING

STORAGE AND/OR HANDLING OF CUTTING AND/OR
WELDING OPERATION

THIS PERMIT EXPIRES: 09/30/2015

This permit is used and accepted subject to all applicable provisions of the Cincinnati Fire Prevention Code now adopted, or
that may hereafter be adopted.

This permit does not take the place of any license required by law and is not transferable. Any change in the use or
occupancy of premises shall require a new permit.

Richard A. Brown
FIRE CHIEF

THE PERMIT MUST AT ALL TIMES BE POSTED ON THE PREMISES MENTIONED ABOVE



City of

Cincinnati

Cincinnati Fire Department
Permit

Permit Number: **FC20141649** **10/15/2014** Premise Address:
Fire Company: **E38** **ENVIRONMENTAL ENTERPRISES INC.**
Fire District: **D-3** **4650 SPRING GROVE AVENUE**

To: **ENVIRONMENTAL ENTERPRISES INC.**
4650 SPRING GROVE AVENUE
CINCINNATI, OHIO 45232

PURSUANT TO THE PROVISIONS OF THE CINCINNATI FIRE PREVENTION CODE SECTION
105.6.20 THIS PERMIT IS GRANTED TO ENVIRONMENTAL ENTERPRISES INC.
FOR THE PURPOSE OF HAZARDOUS MATERIALS

STORAGE AND/OR HANDLING OF HAZARDOUS
MATERIALS

THIS PERMIT EXPIRES: 09/30/2015

This permit is used and accepted subject to all applicable provisions of the Cincinnati Fire Prevention Code now adopted, or
that may hereafter be adopted.

This permit does not take the place of any license required by law and is not transferable. Any change in the use or
occupancy of premises shall require a new permit.

Richard A. Braun
FIRE CHIEF

THE PERMIT MUST AT ALL TIMES BE POSTED ON THE PREMISES MENTIONED ABOVE



OSHA's Form 300A Summary of Work-Related Injuries and Illnesses

2016
U.S. Department of Labor
Occupational Safety and Health
Administration

All establishments covered by Part 1904 must complete this Summary page, even if no work-related injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete and accurate before completing this summary. Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the Log. If you had no cases, write "0". Employees, former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR Part 1904.35, in OSHA's recordkeeping rule, for further details on the access provisions for these forms.

Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restrictions	Total number of other recordable cases
0	0	0	1
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work

0	0
(K)	(L)

Injury and Illness Types

Total Number of...

(1) Injuries	1	(4) Poisonings	0
(2) Skin disorders	0	(5) Hearing loss	0
(3) Respiratory conditions	0	(6) All other illnesses	0

Post this Summary page from February 1 to April 30 of the year following the year covered by the form.

Public reporting burden for this collection of information is estimated to average 50 minutes per response, including time to review the instructions, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a current valid OMB control number. If you have any comments about these estimates or any other aspect of this collection of information, including the burden estimate, the collection of information, the use of the data, and the burden estimate, write to Washington, DC 20503. Do not send the completed forms to this office.

Establishment information			
Your establishment name Environmental Enterprises-Processing facility			
Street 4650 Spring Grove Ave	State OH	Zip 43232	
City Cincinnati			
Industry description (e.g., <i>Manufacture of motor truck trailers</i>) Standard Industrial Classification (SIC), if known (e.g., SIC 3715)			
Or: North American Industrial Classification (NAICS), if known (e.g., 336212)			
Employment information (If you don't have these figures, see the Worksheet on the back of this page to estimate.)			
Annual average number of employees	94		
Total hours worked by all employees last year	166,628		
Sign here Knowing falsifying this document may result in a fine.			
I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.			
Company executive <i>[Signature]</i>		Title PRESIDENT	
Phone 513-772-2818		Date 1/16/17	



OSHA's Form 300A

Summary of Work-Related Injuries and Illnesses

2015
U.S. Department of Labor
Occupational Safety and Health
Administration

All establishments covered by Part 1904 must complete this Summary page, even if no work-related injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete and accurate before completing this summary. Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the Log. If you had no cases, write "0". Employees, former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR Part 1904.35, in OSHA's recordkeeping rule, for further details on the access provisions for these forms.

Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restrictions	Total number of other recordable cases
0	0	2	2
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work

0	42
(K)	(L)

Injury and Illness Types

Total Number of...

(M)	(1) Injures	4	(4) Poisonings	0
		—	(5) Hearing loss	0
	(2) Skin disorders	0	(6) All other illnesses	0
	(3) Respiratory conditions	0		—

Post this Summary page from February 1 to April 30 of the year following the year covered by the form.

Public reporting burden for this collection of information is estimated to average 50 minutes per response, including time to review the instructions, search existing data sources, gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a current valid OMB control number. If you have any comments about these estimates or any other aspects of this data collection, contact: US Department of Labor, OSHA Office of Statistical Analysis, Room N-3604, 200 Constitution Avenue, NW, Washington, DC 20210. Do not send the completed forms to this office.

Establishment information	
Your establishment name	Environmental Enterprises-Processing facility
Street	4650 Spring Grove Ave
City	Cincinnati
State	OH
Zip	45232
Industry description (e.g., <i>Manufacture of motor truck trailers</i>)	
Standard Industrial Classification (SIC), if known (e.g., <i>SIC 3715</i>)	
Or	
North American Industrial Classification (NAICS), if known (e.g., <i>336212</i>)	
Employment information (If you don't have these figures, see the Worksheet on the back of this page to estimate.)	
Annual average number of employees	107
Total hours worked by all employees last year	204,769
Sign here	
Knowingly falsifying this document may result in a fine.	
I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.	
Company executive	Title
<i>[Signature]</i>	President
Phone	Date
513-772-2818	1/28/18



Page 1 of 1

1/20/2015

Form 300 Report

OSHA's Form 300A

Summary of Work-Related Injuries and Illnesses

2014
U.S. Department of Labor
Occupational Safety and Health
Administration

All establishments covered by Part 1904 must complete this Summary page, even if no work-related injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete and accurate before completing this summary. Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the Log. If you had no cases, write "0". Employees, former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301, or its equivalent. See 29 CFR Part 1904.35, in OSHA's recordkeeping rule, for further details on the access provisions for these forms.

Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restrictions	Total number of other recordable cases
0	4	0	4
(G)	(F)	(I)	(J)

Number of Days

Total number of days away from work

41	92
(K)	(L)

Injury and Illness Types

Total Number of:

(1) Injuries	8	(4) Poisonings	0
(2) Skin disorders	0	(5) Hearing loss	0
(3) Respiratory conditions	0	(6) All other illnesses	0

Post this Summary page from February 1 to April 30 of the year following the year covered by the form.

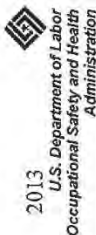
Public reporting burden for this collection of information is estimated to average 50 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to Washington Headquarters Service, Paperwork Project (0192-0108), U.S. Department of Commerce, Washington, DC 20548. Do not send the completed forms to this office.

file:///C:/fika/260KS/HTML/R300Sum.htm



Form 300 Report

OSHA's Form 300A Summary of Work-Related Injuries and Illnesses



2013

U.S. Department of Labor
Occupational Safety and Health
Administration

All establishments covered by Part 1904 must complete this Summary page, even if no work-related injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete and accurate before completing this summary. Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the Log. If you had no cases, write "0".

Employers with 10 or more employees are required to post this summary in a public place where all employees can read it. Employers with 10 or more employees also have the right to review the OSHA Form 300 at the employer's office. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR Part 1904.35, in OSHA's recordkeeping rule, for further details on the access provisions for these forms.

Number of Cases

Total number of deaths _____ Total number of cases with job transfer or restrictions _____ Total number of other recordable cases _____

(G) 0 (H) 1 (I) 4 (J) 2

Number of Days

Total number of days away from work _____ Total number of days of job transfer or restriction _____

(K) 29 (L) 192

Injury and Illness Types

Total Number of...

(M) 7 (4) Poisonings 0
(1) Injuries (5) Hearing loss 0
(2) Skin disorders 0 (6) All other illnesses 0
(3) Respiratory conditions 0


Post this Summary page from February 1 to April 30 of the year following the year covered by the form.

Public reporting burden for this collection of information is estimated to average 30 minutes per response, including time for reviewing instructions, searching existing data sources, gathering the required data, reviewing and collecting the reviewed information, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this information collection, including suggestions for reducing the burden, to Washington, DC 20503. Do not send the completed forms to this office.

file:///C:/jika/260KS/HTML/R300Sum.htm

1/21/2014

2012
U.S. Department of Labor
Occupational Safety and Health
Administration

Establishment information	
Your establishment name	Environmental Enterprises, Inc.
Street	10163 Cincinnati-Dayton Rd
City	Cincinnati
State	OH
Zip	45241
Industry description (e.g., <i>Manufacture of motor track tractors</i>)	
Standard Industrial Classification (SIC) (if known (e.g., <i>37C 3715</i>))	
Or	
North American Industrial Classification (NAICS) (if known (e.g., <i>366212</i>))	
Employment information (If you don't have these figures, see the Worksheet on the back of this page to estimate.)	
Annual average number of employees	171
Total hours worked by all employees last year	232,014
Sign here	
Knowingly falsifying this document may result in a fine.	
(I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.)	
Company executive	 Title _____
Date	5-13-77 2-28-88 1/24/83

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restrictions	Total number of other recordable cases
1	1	1	1
2	2	2	2
3	3	3	3
4	4	4	4
5	5	5	5
6	6	6	6
7	7	7	7
8	8	8	8
9	9	9	9
10	10	10	10
11	11	11	11
12	12	12	12
13	13	13	13
14	14	14	14
15	15	15	15
16	16	16	16
17	17	17	17
18	18	18	18
19	19	19	19
20	20	20	20
21	21	21	21
22	22	22	22
23	23	23	23
24	24	24	24
25	25	25	25
26	26	26	26
27	27	27	27
28	28	28	28
29	29	29	29
30	30	30	30
31	31	31	31
32	32	32	32
33	33	33	33
34	34	34	34
35	35	35	35
36	36	36	36
37	37	37	37
38	38	38	38
39	39	39	39
40	40	40	40
41	41	41	41
42	42	42	42
43	43	43	43
44	44	44	44
45	45	45	45
46	46	46	46
47	47	47	47
48	48	48	48
49	49	49	49
50	50	50	50
51	51	51	51
52	52	52	52
53	53	53	53
54	54	54	54
55	55	55	55
56	56	56	56
57	57	57	57
58	58	58	58
59	59	59	59
60	60	60	60
61	61	61	61
62	62	62	62
63	63	63	63
64	64	64	64
65	65	65	65
66	66	66	66
67	67	67	67
68	68	68	68
69	69	69	69
70	70	70	70
71	71	71	71
72	72	72	72
73	73	73	73
74	74	74	74
75	75	75	75
76	76	76	76
77	77	77	77
78	78	78	78
79	79	79	79
80	80	80	80
81	81	81	81
82	82	82	82
83	83	83	83
84	84	84	84
85	85	85	85
86	86	86	86
87	87	87	87
88	88	88	88
89	89	89	89
90	90	90	90
91	91	91	91
92	92	92	92
93	93	93	93
94	94	94	94
95	95	95	95
96	96	96	96
97	97	97	97
98	98	98	98
99	99	99	99
100	100	100	100

$\left| \begin{array}{c} \vdots \\ \vdots \\ \vdots \end{array} \right|$

Total number of days away from work	Total number of days of job transfer or restriction
0	0
1-3	0
4-6	0
7-14	0
15-30	0
31-60	0
61-90	0
91-120	0
121-150	0
151-180	0
181-210	0
211-240	0
241-270	0
271-300	0
301-330	0
331-360	0
361-390	0
391-420	0
421-450	0
451-480	0
481-510	0
511-540	0
541-570	0
571-600	0
601-630	0
631-660	0
661-690	0
691-720	0
721-750	0
751-780	0
781-810	0
811-840	0
841-870	0
871-900	0
901-930	0
931-960	0
961-990	0
991-1020	0
1021-1050	0
1051-1080	0
1081-1110	0
1111-1140	0
1141-1170	0
1171-1200	0
1201-1230	0
1231-1260	0
1261-1290	0
1291-1320	0
1321-1350	0
1351-1380	0
1381-1410	0
1411-1440	0
1441-1470	0
1471-1500	0
1501-1530	0
1531-1560	0
1561-1590	0
1591-1620	0
1621-1650	0
1651-1680	0
1681-1710	0
1711-1740	0
1741-1770	0
1771-1800	0
1801-1830	0
1831-1860	0
1861-1890	0
1891-1920	0
1921-1950	0
1951-1980	0
1981-2010	0
2011-2040	0
2041-2070	0
2071-2100	0
2101-2130	0
2131-2160	0
2161-2190	0
2191-2220	0
2221-2250	0
2251-2280	0
2281-2310	0
2311-2340	0
2341-2370	0
2371-2400	0
2401-2430	0
2431-2460	0
2461-2490	0
2491-2520	0
2521-2550	0
2551-2580	0
2581-2610	0
2611-2640	0
2641-2670	0
2671-2700	0
2701-2730	0
2731-2760	0
2761-2790	0
2791-2820	0
2821-2850	0
2851-2880	0
2881-2910	0
2911-2940	0
2941-2970	0
2971-3000	0
3001-3030	0
3031-3060	0
3061-3090	0
3091-3120	0
3121-3150	0
3151-3180	0
3181-3210	0
3211-3240	0
3241-3270	0
3271-3300	0
3301-3330	0
3331-3360	0
3361-3390	0
3391-3420	0
3421-3450	0
3451-3480	0
3481-3510	0
3511-3540	0
3541-3570	0
3571-3600	0
3601-3630	0
3631-3660	0
3661-3690	0
3691-3720	0
3721-3750	0
3751-3780	0
3781-3810	0
3811-3840	0
3841-3870	0
3871-3900	0
3901-3930	0
3931-3960	0
3961-3990	0
3991-4020	0
4021-4050	0
4051-4080	0
4081-4110	0
4111-4140	0
4141-4170	0

—

Total Number of...

(1) *Handwritten*

(2) *Machine*

Trial	Control	MCI	AD
1	95	85	75
2	95	85	75
3	95	80	70
4	95	78	68
5	95	75	65

1

Public reporting burden for this collection of information is estimated to average 50 minutes per response, including the time for reviewing the instructions, searching existing data sources, gathering the data needed, and completing and reviewing this collection of information. Send comments regarding this burden estimate or any aspect of this collection of information, including suggestions for reducing the burden, to Washington Headquarters Service, Paperwork Project (0182-0002), Washington, DC 20503.



ENVIRONMENTAL ENTERPRISES INCORPORATED

TREATMENT FACILITY
4650 Spring Grove Avenue
Cincinnati, OH 45232
Phone: (513) 541-1823
Fax: (513) 541-1638
EPA ID#: OHD 083377010



OFFICE/LABORATORY
10163 Cincinnati-Dayton Road
Cincinnati, OH 45241
Phone: (513) 772-2818
Fax: (513) 782-8950
(800) 722-2818

RE: DOT Security Plan

To Whom It May Concern:

This is to inform you that effective September 25, 2003, Environmental Enterprises, Inc. (EEI) developed and implemented a security plan to address the security risks of the hazardous materials shipped and received by EEI. This written plan conforms to Department of Transportation's regulations for security plans listed in 49 CFR 172.800, which require performing an assessment of the possible security risks for hazardous materials transported and received and providing the measures to address the assessed risks.

The components of EEI Security Plan includes EEI security policies and procedures for addressing security risks for the three elements listed in §172.802: personnel security, (assuring that applicants are evaluated for security risks); facility security, (preventing unauthorized access to hazardous materials while on site); and en route security of the hazardous materials transported by EEI.

Environmental Enterprises, Inc. (EEI) is committed to providing a safe work environment. EEI is also committed to providing adequate security measures to ensure the physical safety of employees, customers, and the general public, and to reduce or prevent loss or damage to the equipment or the facility.

EEI's security Plan contains Sensitive Security Information (SSI) that is controlled under 49 CFR parts 15 and 1520 and may not be disclosed to persons without a "need to know", as defined in 49 CFR parts 15 and 1520, without the written permission of the Administrator of the Transportation Security Administrator, or the Secretary of the Department of Transportation. EEI will not release this plan or share information regarding this plan with any person outside the company, other than, as required by law and regulation, to a duly authorized officer of a law enforcement or regulatory agency, without the express written consent of executive management.

For additional questions regarding the security plan, please contact your EEI sales representative.

Sincerely,

Environmental Enterprises, Inc.



**UNITED STATES OF AMERICA
DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION**



**HAZARDOUS MATERIALS
CERTIFICATE OF REGISTRATION
FOR REGISTRATION YEAR(S) 2016-2017**

Registrant: ENVIRONMENTAL ENTERPRISES INC
Attn: DAN MCCABE
4650 SPRING GROVE AVENUE
CINCINNATI, OH 45232

This certifies that the registrant is registered with the U.S. Department of Transportation as required by 49 CFR Part 107, Subpart G.

This certificate is issued under the authority of 49 U.S.C. 5108. It is unlawful to alter or falsify this document.

Reg. No: 063016 550 029Y Effective: 07/01/2016 Expires: 06/30/2017

HM Company ID: 017873

Record Keeping Requirements for the Registration Program

The following must be maintained at the principal place of business for a period of three years from the date of issuance of this Certificate of Registration:

- (1) A copy of the registration statement filed with PHMSA; and
- (2) This Certificate of Registration

Each person subject to the registration requirement must furnish that person's Certificate of Registration (or a copy) and all other records and information pertaining to the information contained in the registration statement to an authorized representative or special agent of the U. S. Department of Transportation upon request.

Each motor carrier (private or for-hire) and each vessel operator subject to the registration requirement must keep a copy of the current Certificate of Registration or another document bearing the registration number identified as the "U.S. DOT Hazmat Reg. No." in each truck and truck tractor or vessel (trailers and semi-trailers not included) used to transport hazardous materials subject to the registration requirement. The Certificate of Registration or document bearing the registration number must be made available, upon request, to enforcement personnel.

For information, contact the Hazardous Materials Registration Manager, PHH-52, Pipeline and Hazardous Materials Safety Administration, U.S. Department of Transportation, 1200 New Jersey Avenue, SE, Washington, DC 20590, telephone (202) 366-4109.



**UNITED STATES OF AMERICA
DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION**



**HAZARDOUS MATERIALS
CERTIFICATE OF REGISTRATION
FOR REGISTRATION YEAR(S) 2016-2019**

Registrant: MIDWEST ENVIRONMENTAL TRANSPORT INC
Attn: KIMBERLY WEYLER
10163 CINCINNATI DAYTON ROAD
CINCINNATI, OH 45241

This certifies that the registrant is registered with the U.S. Department of Transportation as required by 49 CFR Part 107, Subpart G.

This certificate is issued under the authority of 49 U.S.C. 5108. It is unlawful to alter or falsify this document.

Reg. No: 052616 550 015YA Effective: 07/01/2016 Expires: 06/30/2019

HM Company ID: 020054

Record Keeping Requirements for the Registration Program

The following must be maintained at the principal place of business for a period of three years from the date of issuance of this Certificate of Registration:

- (1) A copy of the registration statement filed with PHMSA; and
- (2) This Certificate of Registration

Each person subject to the registration requirement must furnish that person's Certificate of Registration (or a copy) and all other records and information pertaining to the information contained in the registration statement to an authorized representative or special agent of the U. S. Department of Transportation upon request.

Each motor carrier (private or for-hire) and each vessel operator subject to the registration requirement must keep a copy of the current Certificate of Registration or another document bearing the registration number identified as the "U.S. DOT Hazmat Reg. No." in each truck and truck tractor or vessel (trailers and semi-trailers not included) used to transport hazardous materials subject to the registration requirement. The Certificate of Registration or document bearing the registration number must be made available, upon request, to enforcement personnel.

For information, contact the Hazardous Materials Registration Manager, PHH-52, Pipeline and Hazardous Materials Safety Administration, U.S. Department of Transportation, 1200 New Jersey Avenue, SE, Washington, DC 20590, telephone (202) 366-4109.



Alliance for Uniform HazMat Transportation Procedures Uniform Program Credentials



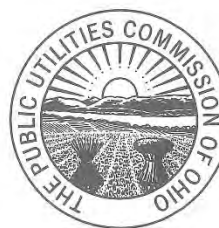
MIDWEST ENVIRONMENTAL TRANSPORT INC
10163 CINCINNATI-DAYTON ROAD
CINCINNATI, OH 45241

ALLIANCE
FOR UNIFORM
HAZMAT
TRANSPORTATION
PROCEDURES

USDOT Census #	00333081	
MC Docket #	N/A	
EPA Transporter ID #	OH0000000539	44252
Intrastate Motor Carrier #:	N/A	138351

Phone Number to call in case of a accident or emergency: 800-392-1503

Uniform Program ID:	UPW0333081OH		
Certified By:	Smith, Priscilla		
Issuance Date:	04-Feb-2016	Expiration Date:	01-Apr-2017
Issuing Agency:	PUBLIC UTILITIES COMMISSION OF OHIO		
Agency Telephone:	(614) 466-3392		



1 of 1





U.S. Department
of Transportation
**Federal Motor
Carrier Safety
Administration**

1200 New Jersey Ave., S.E.
Washington, DC 20590

March 9, 2016

In reply refer to:
USDOT Number: 333081
MC Number: MC255975

DALE R. FRENCH
VICE PRESIDENT
MIDWEST ENVIRONMENTAL TRANSPORT, INC.
10163 CINCINNATI-DAYTON ROAD
CINCINNATI, OH 45241

HAZARDOUS MATERIALS SAFETY PERMIT
HM Safety Permit ID: US-333081-OH-HMSP
Effective Date: March 9, 2016

Dear DALE R. FRENCH:

The Hazardous Materials Safety Permit (HMSP) is verification of the motor carrier's permission to engage in the transportation of hazardous materials listed in 49 CFR 385.403 by motor vehicle in interstate, intrastate, or foreign commerce.

This HMSP will be effective beginning March 9, 2016 and remain effective through January 31, 2018 if your company maintains compliance with the requirements pertaining to the safe and secure movement of hazardous materials for the protection of the public (49 CFR 385 and other applicable Federal Motor Carrier Safety Regulations and Hazardous Material Regulations). Failure to maintain compliance will constitute sufficient grounds for suspension or revocation of this authority.

Willful and persistent noncompliance with applicable safety fitness regulations as evidenced by a Department of Transportation safety fitness rating less than "Satisfactory" or by other indicators, could result in a proceeding requiring the holder of this permit to show cause as to why this authority should not be suspended or revoked.

For questions regarding this document you may contact the FMCSA Hazardous Materials Division at 202-366-6121.

Sincerely,

Joseph P. DeLorenzo
Director, Office of Enforcement and Compliance



01/14/2008 12:08 FAX 513 782 8930

ENVIRONMENTAL ENTERPRISE - PLANT

0000



The Public Utilities Commission of Ohio

*Monitoring marketplaces and enforcing rules to
assure safe, adequate, and reliable utility services*

Bob T. L. Lewis
Alan B. Schirmer, C. R. R. R.

Commissioner
Ronda Harman, R. R. R.
Judy R. R.
Valerie A. R. R.
Donald L. R. R.

December 22, 2006

MIDWEST ENVIRONMENTAL TRANSPORT INC.
10163 CINCINNATI-DAYTON ROAD
CINCINNATI, OH 45241

Dear Motor Carrier:

As you may know, recent federal legislation has resulted in the expiration of the Single State Registration System (SSRS) as of January 1, 2007. Although SSRS is being replaced by the Unified Carrier Registration System (UCR), the rules, procedures and fees under the UCR system have not yet been established.

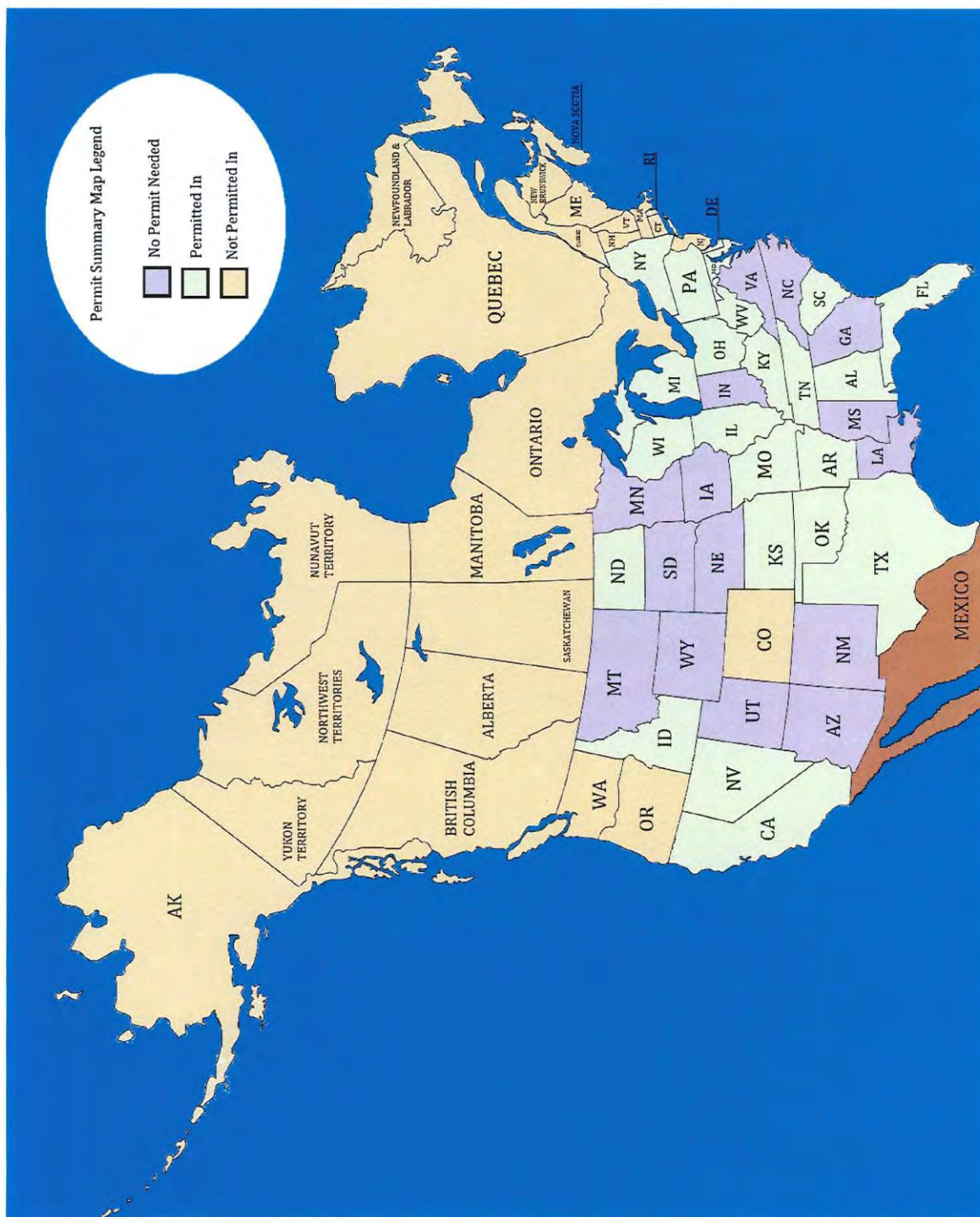
As a result, the PUCO is unable to accept 2007 SSRS registrations and payments at this time. If the SSRS is extended, or once the UCR procedures are in place, your company will receive the appropriate registration packet from us at that time. This registration material will include instructions for submitting the required application and fee payment.

The appropriate motor carrier enforcement personnel have been notified of the current situation. You will receive sufficient time to comply before registration enforcement is resumed. Although some carriers cannot be required to comply with some registration requirements at this time, it is important to remember that all other state and federal motor carrier safety regulations are not effected by the SSRS to UCR change and will continue to be enforced.

If you have any questions or require further assistance, please contact the Motor Carrier Registration Section at (614) 466-3392.

Sincerely,

Leonard J. Shenk, Chief
Transportation Department
Administrative Systems Division





John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

August 24, 2016

Mr. Daniel McCabe
Environmental Enterprises, Inc.
10163 Cincinnati-Dayton Road
Cincinnati, Ohio 45241

RE: Environmental Enterprises Inc.
Inspection
Letter of Compliance
RCRA C - Hazardous Waste
Hamilton County
OHD083377010

Hazardous Waste Program – DERR

Subject: CEI Letter of Compliance

Dear Mr. McCabe:

Thank you for accompanying me, Pete Ferron, Tim Killeen and Jeff Smith during Ohio EPA's July 28, 2016 and August 1, 2016, Compliance Evaluation Inspection (CEI) of Environmental Enterprises, Inc. (EEI) at 4650 Spring Grove Ave, Cincinnati OH 45232. The goal of our inspection was to determine EEI's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and the rules in Chapter 3745 of the Ohio Administrative Code (OAC) and the terms and conditions of EEI's permit conditions issued on September 30, 2009. Our inspection included a review of EEI's operations and written documentation associated with Facility operations.

We found no violations of Ohio hazardous waste laws, regulations and EEI's permit terms and conditions during this inspection. Please be advised that this notice of compliance is only associated with those areas of the operations that were inspected or documentation reviewed and does not constitute a waiver of potential violations not discovered.

A copy of the inspection report including checklists that we completed as a result of the inspection will be sent with a separate letter. You can find Ohio's hazardous waste rules and other information on the division's web page at: <http://epa.ohio.gov/dmwm/Home.aspx>. Should you have any questions, please contact me at (937) 285-6091 or pamela.hull@epa.ohio.gov.

Sincerely,

Pam Hull, Southwest District Office, HW-DERR
PH/tb

ec: George Strobel, Southwest District Office, HW-DERR
Tammy McConnell, CO, HW-DERR

Southwest District Office • 401 East Fifth Street • Dayton, OH 45402-2911
www.epa.ohio.gov • (937) 285-6357 • (937) 285-6249 (fax)



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

August 17, 2016

Mr. Daniel McCabe
Environmental Enterprises, Inc.
10163 Cincinnati-Dayton Road
Cincinnati, Ohio 45241

Re: Environmental Enterprises Inc.
Resolution of Violation (ROV)
RCRA C - Hazardous Waste
Hamilton County
OHD083377010

Hazardous Waste Program – DERR

Subject: Resolution of Violation

Dear Mr. McCabe:

Thank you for your August 16, 2016, response to Ohio EPA's May 13, 2016, Notice of Violation (NOV) letter. The violations were originally communicated to you in a Notice of Violation letter dated March 10, 2014, following a focused compliance inspection (FCI) conducted on December 13, 2013. The violations also appeared in Ohio EPA's May 14, 2014, June 15, 2015, December 13, 2015, and February 9, 2016, NOV letters. The documentation you submitted as follow-up information after Ohio EPA's July 27, 2016, and July 28, 2016, FCI of Environmental Enterprises, Inc.'s (EEI) Waste Analysis Plan (WAP) included records that EEI trained its employees how to measure temperature change as a required tool to determine incompatibility between hazardous wastes mixed together or mixed with household hazardous wastes (HHW). The documentation submitted by EEI also included 10 days of completed Record of Compatibility forms for lab pack processing, fuel blending and chemical treatment.

Ohio EPA has reviewed the documentation that EEI provided, the Class 1a permit modification EEI submitted on June 29, 2016, to modify your WAP to change how EEI will characterize hazardous and HHW mixed with hazardous wastes, precautions EEI will take when mixing hazardous wastes together or with HHW, and the information Ohio EPA collected during Ohio EPA's July 27, 2016, and July 28, 2016, FCI. Ohio EPA has determined that EEI has now resolved all violations discovered during the December 13, 2013, FCI following a fire and explosion that occurred at EEI on December 11, 2013. Ohio EPA is currently in the process of approving your Class 1a permit modification submitted on June 29, 2016. To ensure that all the violations have been addressed, Ohio EPA has included EEI's response for each violation and its status.

Southwest District Office • 401 East Fifth Street • Dayton, OH 45402-2911
www.epa.ohio.gov • (937) 285-6357 • (937) 285-6249 (fax)



Mr. Daniel McCabe
Environmental Enterprises, Inc.
August 17, 2016
Page 2 of 3

Resolution of Violation

NOV Citation # 1; **General Waste Analysis Plan, Condition B.3(a) & (b) and Ohio Administrative Code (OAC) rule 3745-54-13:** The Permittee must obtain a detailed chemical and physical analysis of hazardous or nonhazardous wastes prior to treating, storing or disposing of them and follow the procedures described in the WAP found in Section C of the permit application and the terms and conditions of this permit.

On June 29, 2016, Ohio EPA received EEI's Class 1a permit modification to Section C of your permit application with updated procedures on how EEI will characterize hazardous and HHW mixed with hazardous wastes. On July 27, 2016, and July 28, 2016, Ohio EPA conducted a FCI to determine if EEI was following the updates EEI submitted in your June 29, 2016, Class 1a permit modification. The FCI provided proof that EEI is following the changes to the WAP as submitted by EEI. **Therefore, this violation has been resolved.**

NOV Citation # 2; **Special Container Provisions for Ignitable or Reactive Waste, Condition C.10(a) & (c) and OAC rule 3745-54-17(A), (B) and (C):** The Permittee must store ignitable or reactive waste in accordance with OAC rules 3745-54-17 and 3745-55-76 and take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and shall follow the storage procedures specified in Section F of the permit application.

On June 29, 2016, Ohio EPA received EEI's Class 1a permit modification to Section C of your permit application to update precautions EEI will take when mixing hazardous wastes together or with HHW by following ASTM Method 5058. On July 27, 2016, and July 28, 2016, Ohio EPA conducted a FCI to determine if EEI was in compliance with ASTM Method 5058. Ohio EPA determined that EEI was not following the temperature recording portion of the method. Ohio EPA communicated this to EEI on August 2, 2016, and requested 10 days of completed Record of Compatibility forms. EEI informed Ohio EPA that employee training would occur that day. EEI submitted the proof of training and 10 days of completed Record of Compatibility forms on August 16, 2016. **Therefore, this violation has been resolved.**

NOV Citation # 3; **Proper Operation and Maintenance/Design and Operation of Facility, Condition A.9 and OAC rule 3745-50-58(E)/OAC rule 3745-54-31:** The Permittee must, at all times, properly operate and maintain the facility (and related appurtenances) to achieve compliance with the terms and conditions of this permit, including operated to minimize the possibility of a fire, explosion or unplanned release. Proper operation and maintenance includes effective management practices; appropriate funding, adequate operator staffing and including appropriate quality assurance/quality control procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the terms and conditions of this permit.



Mr. Daniel McCabe
Environmental Enterprises, Inc.
August 17, 2016
Page 3 of 3

On June 29, 2016, Ohio EPA received EEI's Class 1a permit modification for Section C of your permit application. Ohio EPA performed a FCI at EEI on July 27, 2016, and July 28, 2016, to verify compliance. The FCI and EEI's August 16, 2016, submitted response corrected the above violation. **Therefore, this violation has been resolved.**

NOV Citation # 4; **Duty to Comply, Condition A.5 and OAC rule 3745-50-58(A)**: The Permittee must comply with all applicable provisions of ORC Chapter 3734, all applicable hazardous waste rules, and all terms and conditions of this permit, except to the extent and for the duration that laws of the state of Ohio authorize such noncompliance. Any permit noncompliance, other than noncompliance authorized by the laws of the state of Ohio, constitutes a violation of ORC Chapter 3734 and is grounds for enforcement action, revocation, modification, denial of a permit renewal application or other appropriate action.

On June 29, 2016, Ohio EPA received EEI's Class 1a permit modification to Section C of your permit application. Ohio EPA performed a FCI at EEI on July 27, 2016, and July 28, 2016, to verify compliance. The FCI and EEI's August 16, 2016, submitted response corrected the above violation. **Therefore, this violation has been resolved.**

A copy of the inspection report including checklists that were completed as a result of the FCI will be sent with a separate letter. You can find Ohio's hazardous waste rules and other information on the division's web page at:

<http://epa.ohio.gov/dmwm/Home.aspx>

Should you have any questions, please contact me at (937) 285-6091 or Pamela.Hull@epa.ohio.gov.

Sincerely,

A handwritten signature in cursive script that reads "Pam Hull".

Pam Hull
Hazardous Waste Program – Division of Environmental Response and Revitalization

cc: George Strobel, HW-DERR, SWDO
Tammy McConnell, HW-DERR, CO
Mitch Mathews, HW-DERR, CO
Melissa Joering, EEI

PH/bp



ENVIRONMENTAL ENTERPRISES INCORPORATED

TREATMENT FACILITY
4650 Spring Grove Ave.
Cincinnati, Ohio 45232
(513) 541-1823
Fax: (513) 541-1638
<http://www.eeenv.com>
EPA ID#: OHD 083377010



OFFICE / LABORATORY
10163 Cincinnati-Dayton Rd.
Cincinnati, Ohio 45241
(513) 772-2818
Fax: (513) 782-8950
(800) 722-2818

June 3, 2016

COPY

Mrs. Pam Hull
Ohio EPA, SWDO
401 East Fifth St.
Dayton, OH 45402-2911

Dear Ms. Hull:

In response to your letter of May 13, 2016, Environmental Enterprises, Inc. (EEI) offers the following:

The one violation of Ohio's hazardous waste law was a cardboard box, which had previously been taped but came loose and was reattached within seconds during the inspection. None of the other 4,000+ containers inspected were "unsealed".

Below are my responses to the General Comments of your letter:

- Ohio EPA observed a leak in a skylight which caused water to collect on the floor near non-hazardous waste drums (see photos 3-5 in the attached inspection report).

The absence of roof leaks are not a RCRA requirement. There is no requirement for waste to be stored inside a building or to be protected from the elements. Nevertheless, we will clean and seal the roof and caulk the skylight to reduce the amount of precipitation entering the facility. However, in all likelihood given the age of the structure (1940's) roof leaks will be a continuing occurrence despite on-going maintenance improvements.

- Ohio EPA observed a couple of secondary containment issues. These include a small hole in the wall between rows 105 and 106, some cracks near row 403 and cracks in the outside truck containment pad (see photos 6-8 in the attached inspections reports).

The small hole between rows 105 and 106 only extended inward 3". Thus, containment was not breached by this hole which is 7" above the floor. Nevertheless, we patched and sealed this hole.

The cracks near row 403 consisted of the floor coating lapped up against the outside wall, which has delaminated from the wall making it appear there are cracks in the wall. Even





though there does not appear to be a breach in the containment, EEI patched and sealed the gap between the floor coating on this outside wall.

Cracks will occur in concrete and asphalt, but there is no evidence that it extends through the multiple layers of concrete and asphalt that are present. The containment area holds water from precipitation. When the lot was paved, three layers of 6-mil polyethylene membrane was placed under the concrete for containment purposes.

- During the records review, Ohio EPA recommended that EEI document why certain topics are not covered for employees on the "Training Required for Position". If EEI notes this, it details why it is not being completed versus the appearance that required training has not been provided to employees.

EEI will notate on the employees training record with an "NA" if the employee is not required to do the training.

EEI disputes the alleged violations of the following permit conditions and rules cited in Ohio EPA's March 10, 2014, May 14, 2014, June 12, 2015, December 14, 2015, and February 9, 2016, NOV's. EEI's responses of March 18, 2014, August 27, 2014, June 25, 2015, December 28, 2014, March 17, 2016, covered what needed to be done and answered.

Since 2013, Ohio EPA has repeatedly alleged that EEI somehow violated its 2009 approved Waste Analysis Plan (WAP) without providing any specific citations to any portion of the plan. In June 2015, Ohio EPA requested that we revise the WAP in order to alleviate the "supposed violations".

Our continuing comment, since that time, has been that requesting revisions to the WAP that the agency approved in 2009 is not a violation. Instead of a NOV, the proper course would have been an NOD that required an updated plan to address your concerns. In August 2015, EEI submitted a stand-alone 1,328 page revision.

In September 2015, we met in your office to discuss the submittal and how to proceed. During the meeting we agreed to meet with you and others to determine what additional changes needed to be made to the WAP. After four meetings we submitted a second revision in November 2015, which you and Gary Davis were under the same belief that all items had been addressed and that one final meeting would occur to finalize the WAP with everyone at EEI and the Agency in concurrence. Your letter of May 13, 2016, is the first comments we received since November 2015.

We did meet with you and others from your office and central office to resolve a couple issues and as a result we made a few other minor changes to the WAP and submitted those two days after the meeting.



In order to finally resolve this issue we provide the following information, comment by comment, which will be included in the final version of an updated WAP.

Comment SK1: "this is a huge list". The list is what it is.

Table C-1 lists example waste codes for various types of waste specified by common name or class of waste. See attached revision to page C-3.

Table C-2 list waste by chemical name and waste code. Table C-2 was revised in July 2015 and November 2015 to mirror the Part A.

Comment SK2: "What are these?"

Referring to DOT hazard classes 4.1, 4.2 and 4.3. These are specified in 49 CFR dot hazardous materials regulations.

Comment SK3: Does EEI reference what these are?

The Paragraph will be changed to read as follows:

This would include HHW DOT class 4.1, **FLAMMABLE SOLID**, 4.2, **SPONTANEOUSLY COMBUSTIBLE**, 4.3, **DANGEROUS WHEN WET** materials.

Ohio EPA should be aware that all employees are trained regarding ignitable waste which includes training on the DOT hazard classes by label recognition and number.



Comment HP 4: Make sure to reference concentrations when defining reactivity.

There are no specific concentrations specified for reactivity. We use the definition found in US EPA and Ohio EPA regulations, which do not define a concentration, since none are applicable. For example, sodium always reacts with water; this is not concentration dependent; other materials may be reactive such as explosives when exposed to shock. While it is generally accepted for landfills to limit reactive sulfide to 500 ppm, this limit is not specified by US EPA or Ohio EPA as the definition of reactive. Each situation is different and this artificial limit may provide a false sense of security in some situations such as small spaces or confined spaces.

The section of the WAP dealing with this issue has been revised as follows:



EEI also manages HAZARDOUS wastes FROM INDUSTRY AND HOUSEHOLDS exhibiting the characteristic of reactivity as defined in 40 CFR 261.23 and OAC 3745-51-23. These are listed in Tables C-1 and C-2 and include chloro-methyl and nitro-substituted phenols. Phenols are considered hazardous because of reactivity as well as toxicity. EEI treats these materials to remove the characteristic or ships them off-site for treatment INCINERATION. ANALYSIS OR SCREENING MAY BE PERFORMED ON CYANIDES OR SULFIDES, HOWEVER, OTHER REACTIVES SUCH AS SPONTANEOUSLY COMBUSTIBLE, PYROPHORIC, OR POTENTIALLY EXPLOSIVE WASTES ARE NOT, SINCE NO METHODS FOR SUCH REACTIVES IS AVAILABLE AND CONFIRMED IN USEPA AND OHIO EPA GUIDANCE.

AN ACCEPTED PRACTICE FOR LANDFILLS, HAS CONSIDERED THOUGH NOT CODIFIED BY USEPA OR OEPA, THAT 500 PPM REACTIVE SULFIDE OR 250 PPM REACTIVE CYANIDE WERE UNACCEPTABLE FOR LAND DISPOSAL AND CONSIDERED THE WASTE TO BE REACTIVE. PART 268 (LAND DISPOSAL RESTRICTIONS) AND OEPA CORRESPONDING REGULATIONS DICTATE THAT WASTES WITH LESS THAN 590 PPM TOTAL CYANIDE OR LESS THAN 30 PPM AMENABLE CYANIDE ARE ACCEPTABLE FOR LAND DISPOSAL AND THEREBY INFERRING THE WASTE TO BE NON-REACTIVE AS DEFINED IN 261.23 AND OAC 3745-51-23. NEITHER REGULATION SPECIFIES A NUMERIC LIMIT FOR SULFIDE ONLY THAT THE REQUIRED TREATMENT IS "DEACT".

Comment HP 5 and SK 6: Make sure this matches waste codes in other places of the application such as the Part A. Wastes managed are only in C-1?

The July 2015, submittal and the proposed revisions submitted in November 2015, corrected all tables and references to the waste codes to mirror the Part A.

No, wastes managed are not only specified in Table C-1. Portions of section B, C, and D reference types of wastes managed. Table C-1 provides some common names associated with the most common waste codes managed. This is not an all-inclusive list.

Page C-3 has been changed as follows:

STAINS, and those listed in Tables C-1 and C-2. These typically have adequate Heat content for recycling as fuels. TABLE C-1 PROVIDES EXAMPLES OF COMMON WASTES MANAGED AT THE FACILITY BY COMMON NAME AND ASSOCIATED WASTE CODES. THIS IS NOT AN ALL INCLUSIVE LIST. TABLE C-2 LISTS ALL WASTES MANAGED AT THE FACILITY.



Comment HP 7: Screening of oxidizer method should have a review of Zobell's solution expiration date. Reactive sulfide correct designation is D678-16 not D979-25; believe the designation for ASTM cited for screening reactive sulfides should be D4978 not D4979.

In general we make sure SW-846/ASTM's are accurate and up-to-date.

Ohio EPA is correct. The SOP had a typographical error indicating D4979. However, the correct ASTM method was attached to the SOP. The SOP has been corrected with the proper designation. *See attached.* For all SOP's that reference an SW-846 or ASTM method, the current most up-to-date method will be available for review. The SOP's are correct as of the time of submittal. The SOP's will not be submitted as changes to the permit as future methodologies change designation or are updated. This fact will be noted on the cover sheet to attachment C-27.

Our screening for oxidizers are typically done by using KI paper and not an actual measurement of Oxidation Reduction Potential (ORP). As the method states, this screening method is used to determine the relative strengths of oxidizers and reducing agents. An absolute value is not important for our purposes.

Zobell's solution is a 5% solution of Potassium Chromate. Potassium chromate is a strong oxidizer. A sample that may be compared to Zobell's solution is only used to determine its relative strength as a strong or weak oxidizer in comparison. If the solution is out-of-date, it has no effect on our determination of relative strength. We will refer to the ASTM method for such date reviews as necessary.

Comment HP 8: Should expand by including procedure on how an employee determines and does this. Should be a fingerprinting process diagram, map of flow chart to understand interconnection with fingerprinting procedures (include mandatory and secondary contingent procedures).

Typically color, odor or viscosity are clues to question contents not matching a label. EEI does fingerprinting to determine hazard class for shipping and category as shown in US EPA potentially incompatible materials table in attachment C-31. This paragraph will be expanded to indicate and look for color, odor, or other physical properties such as viscosity or density to indicate a possible variance from the label. If such indications are present, determine pH and other screening methods as necessary to determine hazard class and compatibility category. Copy of screening instructions and record will be added to attachment C-27.

C.2a(1) has been changed as follows:

DOUBT EXISTS THAT THE HHW MATERIAL IN THE CONTAINER IS NOT THAT DESCRIBED ON THE PRODUCT LABEL. THIS MAY BE DONE AT THE COLLECTION EVENT WHERE THE EEI PERFORMS THE COLLECTION HHW IS COLLECTED OR AT THE FACILITY. THE HHW MAY ALSO BE SUBJECT TO COMPATIBILITY TESTING AT EEI PRIOR TO TREATMENT WITH OTHER REGULATED HAZARDOUS WASTE.



TYPICAL INDICATIONS THAT THE CONTAINER MAY NOT CONTAIN WHAT IS INDICATED ON THE LABEL ARE PHYSICAL PROPERTIES SUCH AS COLOR, ODOR, VISCOSITY, AND DENSITY DETERMINED BY OBSERVATION. FINGERPRINTING TESTING MAY BE USED TO CONFIRM THE CONTENTS OR TO CLASSIFY THE MATERIAL INTO A DOT CLASS AND/OR COMPATIBILITY GROUP AS GIVEN IN THE USEPA LIST OF POTENTIALLY INCOMPATIBLES. SEE ATTACHMENT C-31. SEE THE CURRENT ASTM METHOD D5058 FOR ADDITIONAL INFORMATION AND INSTRUCTION.

Comment HP 9: ASTM-D5058-12 is a method specific to compatibility of screening analysis of waste (see more detailed comments on page C-44) and could be used as a template for facility specific fingerprinting methods SOP.

The methods indicated in response to HP 8 have been taken from a commercially available Haz Cat Kit, which is based on well-known analytical chemistry methodologies and ASTM. These individual qualitative methods are referenced in Meites Handbook of Analytical Chemistry. See attachment C-27 for instructions and record form.

Comment HP10: This statement would be better in a section describing storage volumes/containment calculations.

It appears from the comment that Ohio EPA is confused regarding permitted capacity and containment capacity as it relates to this paragraph. Permitted capacity does not include EEI generated waste for 90 days. Section C.2a(2)(g) discusses such permitted capacity and record keeping, not containment. Therefore, we believe it is in the proper section.

Comment HP11: Refer to ASTM D5058-12 and other TSD permit applications for those that also do bulking. Some level of detail should be included such as weighted mixing, allowing enough time for reactions to initiate or recording the final conditions of the mixed wastes (i.e., precipitation, change in pH, bubbling, etc.).

The record of compatibility testing form submitted to the agency for review and discussed at our meeting has been updated to include conditions to observe such as bubbling, heat generation, etc. and will be included with the final WAP revision.

As far as details such as weighted mixing, the nature of the sampling performed and the fact that 100% of the containers are sampled, weighted mixing is the natural result without the need for calculating overall volume and percentages that one drum or container may represent. This statement will be added to section C.2f.

C.2f now reads:

C.2f Additional Requirements for Ignitable, Reactive or Incompatible



Waste

Waste storage areas for ignitables, reactive, and incompatibles are segregated as shown in Figures B-6 and B-8. Each container storage area and tank area is designed, as described in Section D, to store such wastes safely to prevent ignition, reaction, or commingling of incompatibles. SEE ATTACHMENTS C-31 AND C-32 FOR POTENTIALLY INCOMPATIBLE WASTES. DO NOT STORE FLAMMABLES WITHIN 20 FEET OF OXIDIZERS. DO NOT STORE ACIDS AND CYANIDES OR SULFIDES TOGETHER OR NEXT TO EACH OTHER. DO NOT STORE STRONG ACIDS (pH <3) AND STRONG BASES (pH >12) TOGETHER ON SAME SKID OR OVERTOP OF EACH OTHER. . A combination of referral to reference material such as provided in Attachments C-28, C-31 and C-32 and screening is used to prevent commingling of incompatibles. SEE CURRENT ASTM D5058-12 FOR ADDITIONAL INFORMATION REGARDING COMPATIBILITY AND BULKING.

Prior to introduction of wastes for treatment, a sample IS TAKEN, USING A THIEF SAMPLER, of all wastes to be treated AND placed in a 5-gallon container to evaluate their reaction. FOR SMALL CONTAINERS SUCH AS BOTTLES, A SMALL AMOUNT IS POURED INTO THE 5-GALLON CONTAINER. THIS SAMPLING METHOD AUTOMATICALLY PROVIDES WEIGHTED SAMPLING SINCE ALL CONTAINERS ARE SAMPLED NOT JUST BY WASTE STREAMS (PROFILE) AND ACCOUNTS FOR FULL OR PARTIAL CONTAINER VOLUMES. This activity is conducted by trained waste technicians. The purpose of this test is to identify if wastes for treatment can be safely combined. Reactions looked for by technicians include flames and polymerization, as well as, excessive heat, physical reaction (splattering, bubbling), or fumes. THIS PROCEDURE IS ALSO PERFORMED FOR HHW MIXED WITH REGULATED HAZARDOUS WASTES. AFTER MIXING THE COMPOSITE SAMPLE, IT IS OBSERVED FOR ANY IMMEDIATE OR DELAYED REACTION DURING THE COURSE OF THE DAY WHICH MAY BE AS LONG AS 8 HRS. AND RECORDED ON THE RECORD OF COMPATIBILITY FORM. SEE ATTACHMENT C-34 FOR THIS FORM. NOTE THAT TRULY HAZARDOUS REACTIONS OCCUR VERY QUICKLY. THAT IS WHY THEY PRESENT A SIGNIFICANT HAZARD. SLOWER REACTIONS, WHILE PRESENTING A HAZARD, ARE MUCH LESS DANGEROUS IN LIGHT OF OTHER PRECAUTIONS THAT ARE IN PLACE. THESE SLOWER REACTIONS MAY RELEASE GAS AND INCREASE PRESSURE IN A SEALED CONTAINER OR SLOW GENERATION OF HEAT. TO ADDRESS THE PRESSURIZATION ISSUE, VENTED BUNGS OR PRESSURE RELIEF BUNGS WILL BE PLACED IN THE LIDS OF DRUMS GENERATED BY BULKING OPERATIONS. THESE FORMS ARE MAINTAINED AS PART OF THE FACILITY OPERATING RECORD. The processes for which this test is conducted include:

Comment SK12: How long?

After mixing, the mixed sample is observed throughout the course of the work shift.



It should be noted that truly hazardous reactions occur quickly with significant generation of gas, heat, pressure, fire, etc. in a short period of time. This is what makes them a hazard. We understand that some other reactions may be slow, but these do not pose a significant hazard in light of other precautions and designs of the facility. To that end however, we have addressed these slower reactions, which do not present themselves in the 6 to 8 hours of observation, by using pressure relief bungs on drums resulting from bulking operations at the facility. We indicated that fact to the agency in early 2014 as well as the discontinuance of bulking isocyanates.

The definition of rows and areas could not be a continuing violation because it was never brought up in a prior meeting.

EEI has updated Section C as shown and discussed above. Excerpts from Section C are attached in response with OEPAs most recent comments and agree to implement these changes upon submittal of a modification incorporating all changes in the WAP since June of 2015. Wording in red in the attached pages were changes made last July; wording in green are changes made in November 2015; blue wording was made after meeting with OEPA in April 2016; and the orange wording are the changes made in light of OEPAs most recent comments of May 2016. Mitch Matthews agreed in a meeting with Gerry Ioannides on June 1, 2016, upon receipt of this reply and confirmation that EEI has implemented the changes by SWDO, that a return to compliance letter indicating abatement of all outstanding violations will be expeditiously provided to EEI by SWDO. Gerry informed George Strobel of his conversation with Mitch Matthews and he agreed that SWDO will provide the letter forthwith after confirmation.

Sincerely,
ENVIRONMENTAL ENTERPRISES, INC.

Daniel J. McCabe, P.E.
President



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

May 13, 2016

Mr. Daniel McCabe
Environmental Enterprises, Inc.
10163 Cincinnati-Dayton Road
Cincinnati, Ohio 45241

Re: Environmental Enterprises Inc.
Notice of Violation
NOV
RCRA C -- Hazardous Waste
Hamilton County
OHD083377010

Subject: March 2016 Compliance Evaluation Inspection (CEI) and Outstanding Waste Analysis Plan (WAP) Violations

Dear Mr. McCabe:

Thank you for accompanying Jeff Smith, Brad Mitchell, George Strobel and me during Ohio Environmental Protection Agency's (Ohio EPA's) March 24, 2016 and March 29, 2016 inspections of Environmental Enterprises Inc. (EEI) facility located in Cincinnati, Ohio. We inspected EEI to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC) and EEI's Ohio hazardous waste installation and operation permit issued September 30, 2009.

We found the following violation of Ohio's hazardous waste laws:

1. ***OAC Rule 3745-273-33(D)(1), Waste Management-Standards for Large Quantity Handlers of Universal Waste***

A large quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

During Ohio EPA's March 24, 2016 CEI, EEI failed to close a container accumulating universal waste lamps.

EEI closed the container during the March 24, 2016 CEI and this **returns EEI to compliance** with OAC Rule 3745-273-33(D)(1).

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Mr. Daniel McCabe
May 13, 2016
Page 2

General Comments

- Ohio EPA observed a leak in a skylight which caused water to collect on the floor near nonhazardous waste drums (see Photos 3-5 in the attached inspection report).
- Ohio EPA observed a couple of secondary containment issues. These include a small hole in the wall between rows 105 and 106, some cracks near row 403 and cracks in the outside truck containment pad (see Photos 6-8 in the attached inspection reports).
- During the records review, Ohio EPA recommended that EEI document why certain topics are not covered for employees on the "Training Required for Position". If EEI notes this, it details why it is not being completed versus the appearance that required training has not been provided to employees.

Please address these concerns within fourteen (14) days of receipt of this letter.

EEI continues to be in violation of the following permit conditions and rules cited in Ohio EPA's March 10, 2014, May 14, 2014, June 12, 2015, December 13, 2015 and February 9, 2016 NOVs:

1. General Waste Analysis Plan, Condition B.3(a) & (b) and OAC Rule 3745-54-13

EEI must continue to work with Ohio EPA to revise the resubmitted Section C of the permit application to ensure it is a stand-alone document and be consistent in the use of terms. Continued cooperation with Ohio EPA will ensure that EEI is able to use the WAP as an employee-training document and have it readily available for personnel to reference Standard Operating Procedures (SOPs) and other details regarding sampling, treatment and storage of hazardous waste.

2. Special Container Provisions for Ignitable or Reactive Waste Condition C.10(a) & (c) and OAC Rule 3745-54-17(A), (B) and (C)

EEI must revise Section C of the permit application as a precaution to prevent accidental ignition or reaction of ignitable, reactive or incompatible waste.

3. Proper Operation and Maintenance/Design and Operation of Facility, Condition A.9 and OAC Rules 3745-50-58(E) and 3745-54-31

EEI must revise Section C of the permit application to achieve compliance with the terms and conditions of the permit.



Mr. Daniel McCabe
May 13, 2016
Page 3

4. Duty to Comply, Condition A.5 and OAC Rule 3745-50-58(A)

EEI must take steps needed to comply with all terms and conditions of their permit.

Ohio EPA is currently reviewing a revised WAP that EEI submitted on April 28, 2016 and revised plant drawings submitted on May 6, 2016. EEI submitted this information following a meeting with Ohio EPA on April 26, 2016.

Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734 of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, EEI is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

Enclosed is a copy of the checklists that we completed as a result of the inspection. You can find Ohio's hazardous waste rules and other information on the division's web page at <http://www.epa.ohio.gov/dhwm/>.

Should you have any questions, please feel free to call me at (937) 285-6091.

Sincerely,

Pam Hull
Environmental Specialist II
Division of Materials and Waste Management

Enclosures

cc: Bonnie Buthker, SWDO, District Chief
Andrea Smoktonowicz, Ohio EPA, Legal
Kelly Smith, CO-DMWM
Brad Mitchell, CO-DMWM
Timothy Kern, Ohio Attorney General's Office
Russ Brown, SWDO-DMWM
George Strobel, SWDO-DMWM
Tammy McConnell, CO-DMWM

PH/ls



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March 17, 2016

COPY

Ms. Pam Hull
Ohio EPA, SWDO
401 East Fourth Street
Dayton, OH 45402

RE: Ohio EPA Letter Dated February 9, 2016-OUTSTANDING VIOLATIONS

Dear Ms. Hull:

This letter responds to Ohio EPA's letter of February 9, 2016.

While we respectfully disagree with Ohio EPA's statement of facts set forth in the February 9, 2016, NOV, Environmental Enterprises, Inc. (EEI) has collected and attached the information requested for; (i) the chemical and physical analysis for the last ten containers into which household hazardous waste was mixed with regulated hazardous waste, and (ii) documentation of compatibility testing for the last twenty-five containers where wastes were mixed together.

The production of these requested documents shall not be construed as an admission to any violations of EEI's Permit or applicable law, which EEI specifically denies, or as an admission to any of the facts or statements set forth in the February 9, 2016, NOV.

EEI requests a Return to Compliance letter in favor of EEI.

If you have any questions, please do not hesitate to call me.

Sincerely,
ENVIRONMENTAL ENTERPRISES, INC.

Daniel J. McCabe, P.E.
President

Attachments: (10) Household Waste Blended with Hazardous Waste
(25) Compatibility Testing



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John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

February 9, 2016

Mr. Daniel McCabe
Environmental Enterprises, Inc.
10163 Cincinnati-Dayton Road
Cincinnati, Ohio 45241

Re: Environmental Enterprises, Inc. (EEI)
Notice of Violation (NOV)
NOV
RCRA C - Hazardous Waste
Hamilton County
OHD083377010

Subject: Outstanding Violations

Dear Mr. McCabe:

This letter is in response to EEI's letter dated December 28, 2015. EEI requested that Ohio Environmental Protection Agency (EPA) provide information regarding how EEI can successfully abate outstanding violations. Below is a chronology of facts regarding the events that have caused the continued violations of Permit Conditions A.9, A.5, B.3(a), B.3(b), and C.10; regulations in Ohio Administrative Code (OAC) 3745-54-13, General Waste Analysis; 3745-54-17, General Requirements for Ignitable Reactive or Incompatible Wastes; 3745-54-31, Design and Operation of Facility; 3745-50-58(A), Duty to Comply; and 3745-50-58(E), Proper Operation and Maintenance.

1. The regulations cited above and the Waste Analysis Plan, both of which are incorporated by reference and contained in EEI's permit, require that the facility obtain a detailed chemical and physical analysis of a representative sample of the wastes before EEI **treats, stores, or disposes** of any hazardous waste. At a minimum, this analysis must contain all the information which must be known to **treat, store, or dispose** of the waste in accordance with the requirements of regulations in OAC 3745-50 through 3745-57.
2. During Ohio EPA's December 13, 2013 Focused Compliance Inspection (FCI), EEI provided the operating record for drum 13-64667, showing that EEI mixed Household Hazardous Waste (HHW) with regulated hazardous waste. EEI's letter dated March 18, 2014, states that consumer product labeling is used to evaluate the HHW prior to mixing with the regulated hazardous waste.
3. In instances where HHW is mixed with regulated hazardous waste, the resulting mixture is a **regulated waste**.

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Mr. Daniel McCabe
February 9, 2016
Page 2

4. The resulting mixture of waste in drum 13-64677 was an EEI generated waste that was subject to evaluation/waste analysis, and was a hazardous waste due to ignitability (D001) and reactivity (D003) as defined in OAC 3745-51-21 and 3745-51-23.
5. Drum 13-64677 was subsequently stored in EEI's permitted storage area.
6. A heat producing chemical reaction occurred in drum 13-64677 that resulted in a fire and explosion on December 11, 2013.
7. In a letter dated May 14, 2014, Ohio EPA requested information regarding the chemical and physical analysis of the HHW mixed into drum 13-64677, which, as stated in "2." above, consisted of consumer product labeling.
8. In a letter dated May 29, 2014, EEI stated, "the containers in question have since been disposed of and are not available to obtain the information provided on the labels" from the HHW mixed into drum 13-64677.
9. In letters dated March 18, 2014 and May 29, 2014, EEI stated that compatibility testing was performed for drum 13-64677.
10. Ohio EPA performed a FCI on March 27, 2015.
 - a. During the inspection, Ohio EPA determined that EEI was unable to provide the consumer product labeling discussed "7." and "8.", because the facility does not retain records of the consumer product labeling.
 - b. During the inspection, Ohio EPA also determined that EEI did not provide results of the compatibility testing for the contents mixed into drum 13-64677 because the facility does not properly maintain compatibility test result records required by OAC 3745-54-17.

As a result of this incident and EEI's failure to adequately evaluate all waste prior to mixing and subsequent storage of hazardous waste at the facility, EEI is in violation of Permit Conditions A.9, A.5, B.3(a), B.3(b), C.10, and the regulations in OAC 3745-54-13, 3745-54-17, 3745-54-31, 3745-50-58(A), and 3745-50-58(E).

To abate violations of Permit Conditions B.3(a), B.3(b) and C.10, and the regulations in OAC 3745-54-13 and 3745-54-17, EEI must do the following:

- Provide Ohio EPA with the chemical and physical analysis of all household hazardous wastes prior to mixing it with regulated hazardous waste. EEI must submit this information for the last ten (10) containers into which household hazardous waste was mixed with regulated hazardous waste.
- EEI must provide Ohio EPA with documentation of compatibility testing for all instances where wastes are mixed together. EEI must submit this information for the last twenty-five (25) containers in all instances where wastes were mixed together.



Mr. Daniel McCabe
February 9, 2016
Page 3

Please be advised that the information requested above is a requirement of your hazardous waste permit as a part of your operating record.

EEL can return to compliance with Permit Conditions A.5, A.9; OAC 3745-50-58(A), 3745-50-58(E) and 3745-54-31, once they successfully abate Permit Conditions B.3(a) B.3(b), C.10; OAC 3745-54-13 and 3745-50-58(E).

If EEL chooses not to take the steps above to abate the violations, Ohio EPA reserves the right to address the outstanding violations through the current administrative enforcement case.

Should you have any questions, please feel free to call me at (937) 285-6091.

Sincerely,

Pam Hull
Environmental Specialist II
Division of Materials and Waste Management

cc: Bonnie Buthker, SWDO, District Chief
Andrea Smoktonowicz, Ohio EPA, Legal
Kelly Smith, CO-DMWM
Jeremy Carroll, CO-DMWM
Timothy Kern, Ohio Attorney General's Office
Russ Brown, SWDO-DMWM
George Strobel, SWDO-DMWM
Karen Bush, SWDO-DMWM
Tammy McConnell, CO-DMWM

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December 28, 2015

Ms. Pamela Hull
Ohio EPA, SWDO
401 East 5th St.
Dayton, Ohio, 45402-2911

Dear Ms. Hull:

Environmental Enterprises, Inc. (EEI) is in receipt of your letter dated December 14, 2015, relative to your focused inspection of September 21, 2015, and September 25, 2015. As you indicated, EEI has patched and coated the various cracks and gaps in the floor located on the 2nd, 3rd and 4th floors. It should be noted that if a spill were to occur on any one of these floors the material would be contained on floor below and not released to the environment.

Also, we have reviewed the checklist for a Used Oil Marketer. EEI does send off-spec used oil to a cement kiln. Therefore, EEI will prepare another Part A to also include used oil marketer activities and submit it as a Class 1 modification before the end of the year.

The WAP includes procedures to prevent the accidental ignition or reaction of ignitable wastes with the screening for pH, cyanides, sulfides, oxidizers, nitrites, nitrates, peroxides, and water reactives. As we have previously explained, US EPA and Ohio EPA's guidance indicate that no test method is available for potential explosives. No facility checks an oxidizer waste stream for the presence of organics. Characterization of the waste is clearly the responsibility of the generator as outlined in Ohio EPA and US EPA generator regulations and EEI's WAP.

The profile form is the lynch pin in the WAP on which all of our information is based. If the generator does not accurately complete the profile then the potential characteristics of the hazardous wastes are unknown to the facility. The Avox profile for this waste stream is attached and this is what EEI relied upon when approving this waste stream and specifying its treatment process. You may recall this profile was furnished to you in our February 25, 2013, letter along with all supporting QA data and manifests on all Avox shipments.

This profile, X86194, failed to characterize this material as an explosive or reactive waste stream. The categories for explosive or reactive are not checked on this form. The heat content for this material is classified as the lowest value listed at <2,000 BTU/lb, and as such, would be incapable of supporting combustion or burning. The constituents also did not indicate the presence of cellulosic fibrous organic matter, which if disclosed would have helped. The shipping name was





Waste Oxidizing Solids Toxic, N.O.S. The waste was characterized as debris, which applies both to PPE and/or air filters with a surface coating of an oxidizer.

The fire generated from this material the morning of December 28, 2012, was of a 7-second duration. It generated a pressure wave, which caused it to release the pressure relief panel contained in the roof and showed a pressure wave moving through the warehouse by the movement of the cameras. This was not an oxidizer reaction but a deflagration of an explosive. The sprinkler system and fire doors activated and as a result the flame was confined to one room. It did not spread through the other areas of the facility. The precautions taken by EEI prevented the spread and the involvement of other materials. The notifications were made to all appropriate authorities prior to 6am that morning.

We were unable to determine the explosive nature of this material due to the failure of the generator to properly describe the characteristics of the material that was shipped and no safe method exists to test for explosives of this type. We did check for other potential reactivity characteristics including oxidizer's as part of our screening to ensure that the waste received was the waste described on the manifest per 3745-54-13.

The drum overpressurization on December 13, 2013, was due to the presence of isocyanates in the drum, which built heat and pressure sufficient to blow the lid off the drum and ignite low flash materials. This was not a failure of the WAP, but an operational failure in that the isocyanates should not have been processed into this drum. EEI resolved this by changing the procedure to not combine isocyanates or Part A & B materials. These are now sent for direct incineration without consolidation.

EEI respectfully disagrees with Ohio EPA regarding a violation with our Waste Analysis Plan (WAP) at the time of the incident on December 28, 2012, and December 13, 2013. EEI was using and complied with the WAP that was approved by Ohio EPA during the Part B Permit Renewal in 2009.

Ohio EPA cannot enforce policies or guidance from US EPA, but must rely on the regulations and the permit issued to EEI in 2009. Attached is a copy of the WAP that was in affect at the time of the incident.

It seems to EEI that if this were an important issue of safety and protection of the environment then Ohio EPA should have promptly informed EEI as to the nature of the violation so that they could be corrected. To date, Ohio EPA has never with any specificity described the alleged violation of the WAP to EEI with respect to these incidents.

During our meeting with Ohio EPA on September 16, 2015, Jeremy Carroll agreed with Gerry Ioannides that Ohio EPA should not issue a Notice of Violation (NOV) on a WAP that is still in the process of being revised.

As requested by Ohio EPA, EEI submitted a 1,328 page revised stand-alone WAP in August 2015. As a result of that submittal and a meeting on September 16, 2015, at your office, we agreed to



further revise that plan in order to address any further concerns that Ohio EPA had regarding the WAP. We met and corresponded on the following dates:

9/17/15	Submit electronic copy of August mod
9/29/15	Received OEPA comments
10/1/15	Submit Tables C-4 and C-6 and response to 9/29/15 comments
	Meeting at EEI with Sarah Harvey, Pam Hull & Pete Ferron
10/9/15	Received comments
10/9/15	Reply to 10/9/15 comments
10/13/15	Submit additional corrections in response to 10/9 comments
10/14/15	Received comments from Sarah Harvey
10/15/15	Reply to 10/14/15 comments pages c-28 thru c-34
10/29/15	Meeting at EEI with Pam Hull
10/30/15	Meeting at EEI with Pam Hull
11/2/15	Meeting at EEI with Pam Hull
11/4/15	Received review checklist from Pam Hull after meeting on 10/1, 10/29, 10/30, and 11/2/15
11/10/15	Submitted corrections and completed checklist with blue highlighted column added
11/12/15	Acknowledgement from Pam Hull of 11/10/email
11/20/15	Email additional change to Pam Hull re: C.2a(2)(d)
11/23/15	Received email from Pam Hull
11/23/15	Reply to Pam Hull re 11/23/15 email
	Resent corrections and checklist
	Requested OEPA review and indicate if any items not addressed in this submittal

During the last meeting on November 2, 2015, Pete Ferron was to provide further clarification on his comments that neither you or Gary Davis understood. However, Pete did not make it to the meeting, so the issues were addressed as you and Gary Davis perceived them. At the conclusion of your last meeting with Gary Davis, EEI believed we were in agreement with Ohio EPA on all topics presented in the review checklist. The updated checklist and plan was submitted to Ohio EPA on November 10, 2015, and again on November 23, 2015. To date, EEI has not received any further comments after making the last submittal on November 23, 2015.

Our review of your checklist indicates that all items have been addressed except for one item on page 3 concerning handling techniques, which Pete Ferron was to clarify. The completed checklist with a response to each yellow highlighted item is attached. A new column has been added that is highlighted in blue as previously sent, is attached.

Review of the WAP after revisions since the August submittal shows that the WAP is a stand-alone document and is consistent in its use of terms. We have provided some training to our staff using the revised WAP and are awaiting Ohio EPA's final approval of the WAP to complete the training.



EEI's understanding was that after the submittal of the corrections on November 23, 2015, Ohio EPA would review the complete application and would meet one final time for everyone to agree and/or request further clarification or explanation. EEI would then prepare and submit another modification, if necessary, with all corrections, explanations, additions, etc. included.

The cases against EEI involving the December 28, 2012, incident were dismissed. Ohio EPA SWDO may have assumed that EEI somehow had a responsibility for the 2012 incident, which was not substantiated in court.

EEI is committed to working with Ohio EPA to resolve this matter as quickly as possible and if any items need further attention, please provide specific information or suggestions.

Sincerely,
ENVIRONMENTAL ENTERPRISES, INC.

A handwritten signature in black ink, appearing to read "Daniel J. McCabe".

Daniel J. McCabe, P.E.
President



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

December 14, 2015

Mr. Daniel McCabe
Environmental Enterprises, Inc.
10163 Cincinnati-Dayton Road
Cincinnati, Ohio 45241

RE: Environmental Enterprises Inc. (EEI)
Notice of Violation (NOV)
NOV
RCRA C - Hazardous Waste
Hamilton County
OHD083377010

Subject: September 2015 CEI, Environmental Enterprises, Inc.

Dear Mr. McCabe:

Thank you for accompanying Pat Willoughby, Sarah Harvey, George Strobel and me during Ohio EPA's September 21, 2015, September 25, 2015 and September 29, 2015 inspection of EEI's facility in Cincinnati, Ohio. We inspected EEI to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC) and EEI's Ohio hazardous waste installation and operation permit issued September 30, 2009.

We found the following violations of Ohio's hazardous waste laws:

- 1. Containment Systems, Condition C.7(b) and Ohio Administrative Code (OAC) Rule 3745-55-75:** The Permittee must ensure that the containment system is free of cracks and gaps and sufficiently impervious to contain leaks and spills until the collected material is detected and removed.

EEI failed to ensure that the containment systems on floors 2, 3 and 4 were free of cracks and gaps. Ohio EPA observed cracks and gaps during our September 25, 2015 CEI.

On September 25, 2015, October 5, 2015 and November 25, 2015, EEI submitted photos via email to Ohio EPA that demonstrated the cracks and gaps had been filled. This **returns EEI to compliance** with Condition C.7(b) and OAC Rule 3745-55-75.

However, please be advised that Ohio EPA will return in the near future to further assess compliance with secondary containment requirements for floors 2, 3, and 4.

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Mr. Daniel McCabe
Environmental Enterprises, Inc.
December 14, 2015
Page 2 of 3

EEL continues to be in violation of the following permit conditions and rules cited in Ohio EPA's March 10, 2014, May 14, 2014 and June 12, 2015 NOV's:

1. **General Waste Analysis Plan, Condition B.3(a) & (b) and Ohio Administrative Code (OAC) Rule 3745-54-13:** EEL must continue to work with Ohio EPA to revise the resubmitted Section C of the permit application to ensure it is a stand-alone document and is consistent in the use of terms. Continued cooperation with Ohio EPA will ensure that EEL is able to use the waste analysis plan (WAP) as its employee training document and have it readily available for personnel to reference SOPs and other details.
2. **Special Container Provisions for Ignitable or Reactive Waste, Condition C.10(a) & (c) and OAC Rule 3745-54-17(A), (B) and (C):** EEL must continue to work with Ohio EPA to revise the resubmitted Section C of the permit application to incorporate procedures that prevent accidental ignition or reaction of ignitable or reactive waste. Continued cooperation with Ohio EPA will ensure that EEL is able to use the WAP as their employee training document and have it readily available for personnel to reference SOPs and other details.
3. **Proper Operation and Maintenance/Design and Operation of Facility, Condition A.9 and OAC Rule 3745-50-58(E)/OAC Rule 3745-54-31:** EEL must continue to work with Ohio EPA to revise the resubmitted Section C of the permit application to achieve compliance with the terms and conditions of the permit. Continued cooperation with Ohio EPA will ensure that EEL is able to use the WAP as their employee training document and have it readily available for personnel to reference SOPs and other details.
4. **Duty to Comply, Condition A.5 and OAC Rule 3745-50-58(A):** EEL must continue to take steps needed to comply with all terms and conditions of the permit as it relates to the WAP.

General Comments

EEL failed to notify Ohio EPA of its used oil processor status. Ohio EPA determined that EEL is a used oil processor during the September 25, 2015 CEI because you store used oil for greater than 35 days. Ohio EPA received EEL's permit modification request on October 20, 2015 to update the Part A Form of your permit application.

However, please be advised that Ohio EPA will return in the near future to conduct a complete used oil processor (and possibly a used oil marketer) inspection. Copies of Ohio EPA's Used Oil Inspection Checklists for Used Oil Processors and Marketers are enclosed for your reference. Please assess Numbers 4 & 5 on the Used Oil Marketer checklist to determine if EEL meets the criteria for a used oil marketer.



Mr. Daniel McCabe
Environmental Enterprises, Inc.
December 14, 2015
Page 3 of 3

The violations cited above will continue until the WAP has been updated such that violations have been properly abated. Failure to comply with Chapter 3734. of the Ohio Revised Code and the rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, EEI must submit written correspondence of the steps that will be taken by date certain to attain compliance.

Enclosed is a copy of the checklists that we completed as a result of the inspection. You can find Ohio's hazardous waste rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>

Should you have any questions, please feel free to call me at (937) 285-6091.

Sincerely,

Pam Hull
Environmental Specialist II
Division of Materials and Waste Management

PH/tb

Enclosures

ec: George Strobel, SWDO-DMWM
Karen Bush, SWDO-DMWM
Tammy McConnell, CO-DMWM
Kelly Smith, CO-DMWM
Tim Kern, EES-AGO
Todd Anderson, Legal



ENVIRONMENTAL ENTERPRISES INCORPORATED

TREATMENT FACILITY
4650 Spring Grove Ave.
Cincinnati, Ohio 45232
(513) 541-1823
Fax: (513) 541-1638
<http://www.eeenv.com>
EPA ID#: OHD 083377010



OFFICE / LABORATORY
10163 Cincinnati-Dayton Rd.
Cincinnati, Ohio 45241
(513) 772-2818
Fax: (513) 782-8950
(800) 722-2818

June 25, 2015

Pam Hull
Ohio EPA, SWDO
401 East Fifth Street
Dayton, OH 45402

COPY

Re: NOV of June 12, 2015

Dear Ms. Hull;

While EEI agrees that the current Waste Analysis Plan (WAP) may need updated and have voluntarily agreed to do so, we strongly disagree that EEI is in violation of any part of the current plan, as approved by OEPA in 2009, or any permit condition. As indicated in several previous letters to OEPA (January 8, 2014, March 18, 2014, May 27, 2014 and May 28, 2015), EEI followed the approved plan in relation to the December 13, 2013 incident. The alleged violations as noted in the NOV letters of March 10 and May 14, 2014, were not a violation of the WAP. Any deficiencies noted in your letter of June 12, 2015 and review check list are not violations of the plan that OEPA previously approved, twice and which EEI followed. The changes requested in the review checklist had nothing to do with the incident noted in the June 12, 2015 NOV letter, which more appropriately should have been an NOD letter. EEI complies with ORC 3745-54-13 by having analysis performed by a contract NELAC lab as necessary on incoming hazardous wastes, where our inspection and screening indicates the need for further analysis. Specifically, EEI complied with ORC 3745-54-13 in relation to the December 13, 2013 incident.

Notwithstanding the above and the few issues discussed below, EEI will revise and submit a new Waste Analysis Plan within 60 days of this correspondence. Please note that while we will address each item in your review checklist and the checklist provided previously, not all will apply to EEI's on-site QA/QC lab, some of which are discussed below. Where such items do not apply we will indicate so and briefly why not.

Generally, EEI's lab is used to inspect incoming shipments by performing screening analyses, not to classify them or determine applicable waste codes and underlying constituents. That onus is on the generator of the waste we receive. Our lab is simply used to comply with ORC 3745-54-13 (A) (4). CLP and/or NELAC requirements for certification are not required for our on-site lab by any OEPA regulation.

OEPA continues to request some type of analysis for reactivity, when USEPA guidance clearly indicates that no test for reactivity exists. In situations such as this, EEI uses available references such as MSDS, Chemical Handbooks, Product literature, Product Labeling, etc., and such reliance is included in the current WAP and which OEPA approved. ORC 3745-54-13(A)(2) clearly permits such use of data other than analysis. Furthermore, 3745-54-13(A)(4) states: "The owner, operator of an off-site facility must inspect and *IF NECESSARY* (italics added), analyze each hazardous waste received at the facility to determine if it matches the identity of the waste specified on the accompanying manifest or shipping paper." ORC does not require EEI or any other facility to enforce the Agency Rules and Regulations



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regarding Generator Requirements or to correct wastes wrongly characterized. The waste profile, which is completed by the generator, includes a section for listing 100% of the composition of the waste and allows for variability of the waste by including a means to indicate the range of the waste composition. A separate section is provided to list any and all underlying hazardous constituents.

EEI's on-site QA/QC lab is used to inspect incoming wastes by performing screening tests to confirm that the waste received matches the identity of the waste described on the profile and the manifest. It thereby confirms the anticipated treatment/disposal method indicated on the profile and if need be, any change in the actual disposal method or pricing. For example, the approval pricing assumed a low volume of sludge or solids. One drum out of 5 may contain sufficient solids such that the treatment/disposal method is the same but more expensive. Perhaps, the anticipated disposal at approval was chemical treatment, but upon receipt, the waste was too thick to pump and now requires incineration. The level of quality assurance required for such inspection of the waste, both for physical and chemical properties, is not that of analysis of drinking water or for results of analysis admissible in a court proceeding. There is no benefit either economically, operationally, or in safety, to obtain rigorous CLP or NELAC type analyses and QA/QC, in order to allow us to meet our objective. Similarly, there is no benefit in performing detailed chemical analysis for every chemical possible if the information is not needed to properly and safely store, treat or dispose of the waste. For example, we receive a drum of F003 methanol waste. Our inspection indicates that the flash point is similar to that of methanol, it physically matches the profile and manifest description, and other inspection criteria are met. There is no need and no benefit to be gained by performing a GC analysis and find that it also contains 10 ppm acetone. The waste code does not change and the disposal method does not change, which in this case is fuel blending.

OEPA questions the use of plastic thief samplers in the review checklist. We use plastic due to a safety issue. We have had people injured using glass tubes resulting in weeks off work and surgery. If we sample a solvent waste which happens to extract a small amount of phthalate from the plastic, it is of no consequence in relation to our stated objective. The disposal method remains unchanged. If we did perform analysis of a solvent sample and found phthalates, it would not result in a "minor variance," off-spec, or rejection since it does not affect the waste code or disposal method, nor impact how to safely store and handle the waste any differently than any solvent waste not containing phthalates. Also, OEPA assumes that layers cannot be seen in the plastic tubes. Even if that were so, once placed in the bottle, all the layers can be seen. Both the tube and bottle are made of HDPE which exhibits the lowest leachability of the plastic bottle types available. Samples sent off-site for characterization are placed in appropriate containers such as glass VOA vials for VOCs, etc. All holding times and preservation technique, and chain of custody requirements are also followed.

If analysis is required for characterization versus inspection, that is a totally different objective and as such, those analyses are performed by an off-site lab which follows all the necessary QA/QC data validation requirements for characterization and provides that documentation with each lab report. EEI does perform batch QA/QC such as calibrations, blanks, etc. A complete QA/QC manual is available in the on-site lab however it was not asked for during the focused inspection.

Data from our on-site lab is not used for characterization, such as, performing a TCLP analysis of a waste to determine if the waste is non-hazardous or a characteristic waste. Analysis of waste generated on-site for potential landfill disposal is performed by an off-site lab with all the QA/QC data verification procedures to provide reliable high quality results.



Our on-site lab is typically looking at percents not parts-per-million. Therefore, factors such as bottle type, sampler type, preservation techniques, and holding times are irrelevant. For characterization analysis, approved containers, holding times, etc. are used to ensure high quality results necessary to confidently classify the waste and proper waste codes and disposal methods required by LDR regulations.

In short, all the above allows us to comply with ORC 3745-51-13 including the use of generator knowledge which OEPA approved as part of our WAP and permit.

As far as sampling and analysis for effectiveness of treatment is concerned, the continuous reading instruments in place in the treatment tanks give an immediate indication to the technicians as to effectiveness and completion of treatment. For example, when treating oxidizers, the ORP meter will indicate the presence of excess oxidizer in the solution. As reducing agents are added the ORP reading decreases and the pH may decrease. If needed, additional caustic is added to maintain the pH and additional reducer is added until the ORP stabilizes or reads negative, indicating that the oxidizer has been thoroughly treated. If a corrosive waste is being neutralized, the continuous reading pH meter will show pH 7 when the waste has been neutralized. No further analysis is required in either of the above scenarios to determine effectiveness of treatment. If cyanides are being treated a sample is taken after it appears the reaction is complete and sent to the on-site lab to verify complete destruction of the cyanide or to levels that no longer pose a threat.

Other post treatment analysis depends on the nature of off-site disposal methods used. Namely, incineration, deep well, landfill, or fuel blending require different parameters. The analyses required, if any, by those off-site facilities is performed by our on-site lab. Again, extremely low level, high precision results are not needed, so the comprehensive QA/QC procedures are not required. Generator knowledge of what was mixed or treated, results of treatment if any and specific analyses needed to meet the off-site acceptance criteria are used to prepare the waste for shipment and prepare the manifest.

Wastes destined for final disposal via secure landfill are shipped using generator knowledge of what wastes were mixed or partially treated and past analyses or periodic new analyses as the receiving facility may require. These shipments are to facilities which further treat the waste to meet LDR restrictions and they perform the required analyses for such disposal. All incoming waste codes, with the possible exception of a D001 Oxidizer or D002 if the waste was neutralized, will carry over to the outgoing shipment. No analysis is required.

Wastes actually shipped off-site for non-hazardous disposal are periodically sampled and analyzed off-site to prove the waste is non-hazardous. This even includes post treatment exempt waste, such as neutralized HHW acids, bases, and cleaners.

You may reach me as always with any comments or questions at (513)541-1823.

Sincerely;
Environmental Enterprises, Inc

Daniel J. McCabe, P.E.
President



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

COPY

June 12, 2015

CERTIFIED MAIL
7013 1710 0000 8830 1181

Mr. Daniel McCabe
Environmental Enterprises Inc.
10163 Cincinnati-Dayton Road
Cincinnati, Ohio 45241

RE: Environmental Enterprises Inc. (EEI)
Notice of Violation (NOV)
NOV
RCRA C - Hazardous Waste
Hamilton County
OHD083377010

Subject: Focused Compliance Inspection (FCI)

Dear Mr. McCabe:

Thank you for accompanying Pete Ferron, Sarah Harvey and me during Ohio EPA's March 27, 2015, FCI of EEI's facility at 4650 Spring Grove Avenue in Cincinnati, Ohio. We inspected EEI to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC) and EEI's Ohio hazardous waste installation and operation permit issued September 30, 2009. Ohio EPA conducted a FCI of EEI's waste analysis plan (WAP) to address outstanding violations.

Our inspection included interviews with quality assurance, laboratory and operations personnel, a tour of EEI's laboratory and review of some written documentation (e.g., lab standard operating procedures, waste receipt worksheets and hazardous waste control tickets). We found the following violations of Ohio's hazardous waste laws. In order to correct these violations you must do the following and send me a schedule for the required information **within 14 days** of your receipt of this letter:

1. **General Waste Analysis Plan, Condition B.3(a) & (b) and Ohio Administrative Code (OAC) Rule 3745-54-13:** The Permittee must obtain a detailed chemical and physical analysis of hazardous or nonhazardous waste prior to treating, storing or disposing of them and follow the procedures described in the waste analysis plan found in Section C of the permit application and the terms and conditions of this permit.

EEI failed to comply with Conditions B3(a) & (b) and OAC Rule 3745-54-13 because multiple items assessed on the WAP checklist did not meet the regulatory requirements (based upon review of Section C of EEI's permit application and information collected during Ohio EPA's March 27, 2015,

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Mr. Daniel McCabe
Environmental Enterprises Inc.
June 12, 2015
Page 2 of 4

FCI). Deficiencies were found in all elements of the WAP such as sampling, analysis, standard operating procedures (SOPs) to identify ignitable, reactive, or incompatible wastes (including household hazardous waste that becomes EEI generated hazardous waste), land disposal restrictions and treatment residues. Please refer to the attached checklist for more detail.

- EEI must revise and resubmit Section C of the permit application. Please utilize the checklist I emailed to Gary Davis on April 24, 2015, as a tool to assist in reviewing your WAP. Please be aware that your WAP must comply with all applicable regulations.

The WAP should be a stand-alone document as much as possible and be consistent in the use of terminology (e.g. "waste profiling" and "screening test" used interchangeably, "fingerprinting" and "sampling for screening" / "sampling for fingerprint verification"). Noting that several WAP modifications have been made over the years, references to other sections of the permit application need to be checked to determine if the referenced sections are still in the permit and/or are still applicable. EEI should be using the WAP as the training document for employees managing and/or testing hazardous waste, and have it readily available for personnel to reference SOPs and other details. EEI should also provide and document initial formal classroom training on the revised WAP to affected employees. EEI will need to provide this training annually.

EEI must immediately submit a schedule for a modification request to the Director to update Section C of the permit application and any other sections that may be impacted.

2. **Duty to Comply, Condition A.5 and OAC Rule 3745-50-58(A):** The Permittee must comply with all applicable provisions of ORC Chapter 3734, all applicable hazardous waste rules, and all terms and conditions of this permit, except to the extent and for the duration that laws of the State of Ohio authorize such noncompliance. Any permit noncompliance, other than noncompliance authorized by the laws of the State of Ohio, constitutes a violation of ORC Chapter 3734 and is grounds for enforcement action, revocation, modification, denial of a permit renewal application or other appropriate action.

EEI failed to comply with Condition A.5 and OAC Rule 3745-50-58(A) by not complying with all terms and conditions of the permit and by not complying with applicable Sections of EEI's Part B Permit Application (specifically, those terms and conditions and section of the permit application that deal with the WAP).



Mr. Daniel McCabe
Environmental Enterprises Inc.
June 12, 2015
Page 3 of 4

- EEI must take steps to comply with all terms and conditions of the permit. EEI must immediately submit a schedule for a modification request to the director to update Section C of the permit application and any other sections that may be impacted.

- **EEI will continue to be in violation of the following permit conditions and rules cited in Ohio EPA's March 10, 2014, and May 14, 2014, NOV's until Ohio EPA approves your updated WAP:**
 1. General Waste Analysis Plan, Condition B.3(a) & (b) and Ohio Administrative Code (OAC) Rule 3745-54-13.
 2. Special Container Provisions for Ignitable or Reactive Waste, Condition C.10(a) & (c) and OAC Rule 3745-54-17(A), (B) and (C)
 3. Proper Operation and Maintenance/Design and operation of Facility, Condition A.9 and OAC Rule 3745-50-58(E)/OAC rule 3745-54-31
 4. Duty to Comply, Condition A.5 and OAC Rule 3745-50-58(A)

EEI needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within 14 days of receipt of this letter, EEI is requested to provide documentation to this office including the steps that will be taken to abate the violations cited above along with your anticipated schedule. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to Pamela.Hull@epa.ohio.gov.

Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734. of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, EEI is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.



Mr. Daniel McCabe
Environmental Enterprises Inc.
June 12, 2015
Page 4 of 4

Enclosed is a copy of the checklist that we completed as a result of the inspection. You can find Ohio's hazardous waste rules and other information on the division's web page at:

<http://www.epa.ohio.gov/dmwm/Home.aspx>

Should you have any questions, please feel free to call me at (937) 285-6091.

Sincerely,

A handwritten signature in black ink that reads "Pam Hull".

Pam Hull
Environmental Specialist II
Division of Materials and Waste Management

Enclosure

ec: George Strobel, SWDO-DMWM
Karen Bush, SWDO-DMWM
EPA.RCRAInfoData@epa.ohio.gov

PH/bp



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

February 3, 2015

Mr. Daniel McCabe
Environmental Enterprises, Inc.
10163 Cincinnati-Dayton Road
Cincinnati, Ohio 45241

RE: Environmental Enterprises, Inc.
Return to Compliance (RTC)
RCRA C – Hazardous Waste
Hamilton County
OHD083377010

Subject: Return to Compliance

Dear Mr. McCabe:

Thank you for your November 12, 2014 response to Ohio EPA's August 13, 2014 Notice of Violation letter. The documentation you submitted was a Class 1 modification request updating your Emergency Equipment in Section F and Contingency Plan information in Section B of your permit application.

My review of this documentation reveals that Environmental Enterprises, Inc. has now abated all violations discovered during the May 28, 2014, and June 3, 2014 Compliance Evaluation Inspection (CEI) inspection as listed below.

Letter Citation #	Rule Citation
2.	Planned Changes, Condition A.15 and OAC Rules 3745-51-51 and 3745-50-58(L)(1)
5.	Duty to Comply, Condition A.5 and OAC Rule 3745-50-58(A)

Should you have any question, please feel free to contact me at (937) 285-6091.

Sincerely,

Pam Hull
Environmental Specialist II
Division of Materials and Waste Management

PH/tb

cc: George Strobel, SWDO-DMWM
Karen Bush, SWDO-DMWM

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www.epa.ohio.gov • (937) 285-6357 • (937) 285-6249 (fax)



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

November 13, 2014

Mr. Daniel McCabe
Environmental Enterprises Inc.
10163 Cincinnati-Dayton Road
Cincinnati, Ohio 45241

RE: Environmental Enterprises Inc.
Notice of Violation
NOV.
RCRA C – Hazardous Waste
Hamilton County
OHD083377010

Dear Mr. McCabe:

Thank you for accompanying Pat Willoughby and me during Ohio EPA's September 29, 2014 semi-annual inspection of Environmental Enterprises, Inc.'s (EEI) facility in Cincinnati, Ohio. We inspected EEI to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC) and EEI's Ohio hazardous waste installation and operation permit issued September 30, 2009. Our inspection included a review of company operations and written documentation.

EEI is a permitted commercial hazardous waste treatment and storage facility. EEI is permitted to store a maximum of 120,275 gallons of hazardous waste at any given time in containers located in 30 areas onsite. EEI is limited to treating 40,000 tons of hazardous waste per year in containers and 6,050 gallons of hazardous waste per day in tanks.

Ohio EPA found the following violation of Ohio's hazardous waste laws:

1. **Duty to Comply, Condition A.5 and OAC Rule 3745-50-58(A): According to Part B Permit Application Section D.1a(2):** All containers of wastes entering the facility are labeled with a completed hazardous, non-hazardous or non-regulated waste label. Once the wastes have been accepted into the facility a pre-numbered "Hazardous Waste Control Ticket" or bar code label is placed on each container. This record provides necessary information required to enable EEI staff to identify the contents of each container and track the waste through the facility and serves as EEI's operating log.

During the inspection, EEI did not have a bar code label on one container of D001 hazardous waste in Area 1401, and three containers of 2-4D fertilizer hazardous waste in Area A2052.

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Environmental Enterprises Inc. – Notice of Violation
November 13, 2014
Page 2

EEL placed bar code labels on all containers identified above during the inspection. EEL has adequately **demonstrated abatement of the violation.**

Outstanding Violations Identified in Ohio EPA's August 13, 2014 Notice of Violation (NOV) letter:

On August 29, 2014, Ohio EPA received EEL's response to the August 13, 2014 NOV letter. EEL's response provided details regarding personnel training provided to Jake Dietz and proposed modifications to your application pertaining to Emergency Equipment in Section F and Contingency Plan information in Section G. EEL provided additional documentation concerning personnel training violations cited in the August 13, 2014 NOV via email on October 15, 2014.

Based upon the information EEL provided, **EEL has adequately demonstrated abatement of the following violation** cited in the August 13, 2014 NOV letter:

- (3) **Personnel Training, Condition B.6 and OAC Rule 3745-54-16(A)(1) and (A)(2)** - Upon reviewing an email submitted on October 15, 2014, EEL provided more detail about Approval Chemist specific training provide to Jake Deitz on the dates identified on his "On the Job Training Documentation Form".

Based upon the information EEL provided, **Ohio EPA is rescinding the following violation** cited in the August 13, 2014 NOV letter:

- (4) **Personnel Training, Condition B.6 and OAC Rule 3745-54-16(D)(2) and (D)(3)**

Upon reviewing your response, Ohio EPA recognizes EEL's attempt to modify their hazardous waste permit to include a new position description for an Approval Chemist. However, based upon a mutual agreement between Ohio EPA and EEL, EEL withdrew this hazardous waste permit modification, and therefore did not modify their hazardous waste permit to include this new position. Due to this equity issue, Ohio EPA rescinds this violation. EEL will continue to work to modify personal training module of EEL's hazardous waste permit, which will include this new position and training provisions.

EEL continues to be in violation of the following permit conditions and rules cited in the August 13, 2014 NOV:

- (2) **Planned Changes, Condition A.15 and OAC Rules 3745-50-51 and 3745-50-58(L)(1)** - Ohio EPA is working with EEL regarding the proposed modifications to your Emergency Equipment in Section F and Contingency Plan information in Section G.



Environmental Enterprises Inc. – Notice of Violation
November 13, 2014
Page 3

- (5) **Duty to Comply, Condition A.5 and OAC Rule 3745-50-58(A)** – EEI must continue to comply with all terms and conditions of their permit.

Ohio EPA's evaluation of EEI's May 29, 2014 letter regarding outstanding violations from EEI's March 10, 2014 NOV regarding the December 11, 2013 fire is on-going.

Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734 of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, EEI is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

Enclosed is a copy of the checklists that we completed as a result of the inspection. You can find Ohio's hazardous waste rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>

Should you have any questions, please feel free to call me at (937) 285-6091.

Sincerely,

Pam Hull
Environmental Specialist II
Division of Materials and Waste Management

PH/tb

Enclosure

cc: George Strobel, SWDO-DMWM
Karen Bush, SWDO-DMWM
Paula Canter, DMWM



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

August 13, 2014

Mr. Daniel McCabe
Environmental Enterprises, Inc.
10163 Cincinnati-Dayton Road
Cincinnati, Ohio 45241

RE: **Environmental Enterprises Inc.
Notice of Violation
NOV
RCRA C – Hazardous Waste
Hamilton County
OHD083377010**

Dear Mr. McCabe:

On May 28, 2014, and June 3, 2014, Ohio EPA conducted a semi-annual Compliance Evaluation Inspection (CEI) at Environmental Enterprises, Inc.'s (EEI) Cincinnati, Ohio facility. EEI is a permitted commercial hazardous waste treatment and storage facility. EEI is permitted to store a maximum of 120,275 gallons of hazardous waste at any given time in containers located in 30 areas onsite. EEI is limited to treating 40,000 tons of hazardous waste per year in containers and 6,050 gallons of hazardous waste per day in tanks. Warren Taylor, Gary Davis and you represented EEI. Jeff Smith, George Strobel, Tim Killeen, Mitch Mathews and I represented Ohio EPA. The purpose of the inspection was to determine EEI's compliance with laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745, of the Ohio Administrative Code and EEI's Ohio hazardous waste installation and operation permit issued September 30, 2009. Ohio EPA's inspection included an inspection of facility operations, a review of training records, tank, container, emergency equipment records, manifests and waste profiles.

Ohio EPA found the following violations of Ohio's hazardous waste laws. In order to correct these violations you must do the following and send me the required information **within 14 days** of your receipt of this letter:

1. **Required Equipment, Condition B.9 and OAC Rule 3745-54-32:** The permittee must maintain all equipment required by this rule and equipment identified in Section G of the permit application.

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Environmental Enterprises, Inc.
August 13, 2014
Page 2 of 4

During the June 3, 2014 CEI, EEI did not have a complete spill kit in Flammable Area 14.

EEI completely stocked the spill kit in this area during the June 3, 2014 CEI. This action **abated this violation**.

- 2. Planned Changes, Condition A.15 and OAC Rules 3745-50-51 and 3745-50-58(L)(1):** The Permittee must give notice to the Director as soon as possible of any planned physical alterations or additions to the facility. All changes must be made in accordance with OAC Rule 3745-50-51.

EEI's permit application regarding locations of spill kits, daily hazardous waste storage area logs and weekly emergency equipment logs contain inconsistent and incomplete information. Notations are enclosed for your reference regarding these parts of the application. EEI needs to thoroughly review the permit application and identify other related alterations, additions and inconsistencies in the permit application.

EEI must immediately submit modification requests to the Director for changes already made to the spill kit locations and address the inconsistency between the emergency equipment, inspection schedule and daily and weekly inspection forms contained in Section F of EEI's permit application.

- 3. Personnel Training, Condition B.6 and OAC rule 3745-54-16(A)(1) and (A)(2)**
EEI failed to demonstrate that Facility personnel successfully completed a program of classroom instruction or on-the-job training that teaches them to perform their duties which are relevant to the position in which they are employed and that ensures the Facility's compliance with the hazardous waste requirements and the hazardous waste installation and operation permit.

Specifically, EEI failed to demonstrate a training program which is relevant to all of Mr. Ken Dietz's job duties has been established, provided and completed. At the time of the inspection, Mr. Ken Dietz's job description and job duties were listed as Clerical as described in Section H of EEI's permit application. However during the inspection, EEI explained Mr. Dietz's roles and responsibilities included activities such as a waste profile preliminary review and preliminary approval for incoming hazardous waste streams to EEI.

In order to correct this violation, EEI must develop and provide and Mr. Ken Dietz must complete a training program which is relevant to all of Mr. Dietz's job duties, including those regarding reviewing and approving hazardous waste streams at EEI. This training program must include both the introductory and continuing training Mr. Dietz would require to perform his normal job duties.



Environmental Enterprises, Inc.
August 13, 2014
Page 3 of 4

4. Personnel Training, Condition B.6 and OAC rule 3745-54-16(D)(2) and (D)(3)

EEL failed to maintain a written job description and training program which describes and encompasses the requisite skill, education, or other qualifications and job duties of employees assigned to each position.

Specifically, EEL failed to demonstrate a written job description and training program which is relevant to all of Mr. Ken Dietz's job duties had been established. At the time of the inspection, Mr. Ken Dietz's job description and job duties were listed as Clerical as described in Section H of EEL's permit application. However during the inspection, EEL explained Mr. Dietz's roles and responsibilities included activities such as a waste profile preliminary review and preliminary approval for incoming hazardous waste streams to EEL.

In order to correct this violation, EEL must provide a written job description and training program for Mr. Dietz which is relevant to all of Mr. Dietz's job duties, including those regarding reviewing and approving hazardous waste streams at EEL. The written job description must include requisite skill, education, or other qualifications and job duties Mr. Dietz is expected to perform. The written training program must include both the introductory and continuing training Mr. Dietz would require to perform his normal job duties.

- 5. Duty to Comply, Condition A.5 and OAC Rule 3745-50-58(A):** The Permittee must comply with all applicable provisions of ORC Chapter 3734, all applicable hazardous waste rules, and all terms and conditions of this permit, except to the extent and for the duration that laws of the State of Ohio authorize such noncompliance. Any permit noncompliance, other than noncompliance authorized by the laws of the State of Ohio, constitutes a violation of ORC Chapter 3734 and is grounds for enforcement action, revocation, modification, denial of a permit renewal application or other appropriate action.

EEL failed to comply with Condition A.5 and OAC Rule 3745-50-58(A) by not complying with all terms and conditions of EEL's permit and by not complying with applicable Sections of EEL's Part B Permit Application.

EEL must take steps to comply with all terms and conditions of the permit.

EEL needs to take the necessary measures to return to compliance with Ohio's hazardous waste laws and its Ohio hazardous waste installation and operation permit issued September 30, 2009. Within 14 days of receipt of this letter, EEL is required to provide documentation to this office including the steps taken to abate the violations cited above. Documentation of steps taken to return to compliance includes, but is not limited to, written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to pam.hull@epa.ohio.gov.



Environmental Enterprises, Inc.
August 13, 2014
Page 4 of 4

Please be advised that violations cited above will continue until properly abated. Failure to comply with Chapter 3734 of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, EEI is requested to submit written correspondence of the steps that will be taken to attain compliance.

Should you have any questions, please call me at (937) 285-6091.

Sincerely,

Pam Hull
District Representative
Division of Materials and Waste Management

Enclosure

cc: Bonnie Buthker, SWDO, District Chief
Todd Anderson, Ohio EPA, Legal
Bruce McCoy, CO-DMWM
Timothy Kern, Ohio Attorney General's Office
Russ Brown, SWDO-DMWM
George Strobel, SWDO-DMWM
Karen Bush, SWDO-DMWM/SWDO Facility File

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with applicable regulations.

PHbp



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

March 10, 2014

CERTIFIED MAIL

Mr. Daniel McCabe
Environmental Enterprises, Inc.
10163 Cincinnati-Dayton Road
Cincinnati, Ohio 45241

RE: Environmental Enterprises Inc.
Notice of Violation
NOV
RCRA C – Hazardous Waste
Hamilton County
OHD083377010

Dear Mr. McCabe:

On December 4, 2013, Ohio EPA received EEI's electronic copy of your response to our November 18, 2013, NOV. This response contained detail about EEI's efforts to correct remaining violations associated with a fire and explosion that occurred at EEI on December 28, 2012. Ohio EPA addresses EEI's response regarding this matter later in this correspondence.

On December 11, 2013, during our review of your response, EEI had a 55 gallon drum located in your flammable storage area holding hazardous waste Ignite and explode. The drum contained hazardous waste received from various generators. Originally the hazardous waste contents of this drum were in multiple individual containers (commonly referred to as "lab packed") from various generators which shipped their lab packed hazardous waste to EEI. EEI, after receiving the various lab packed hazardous wastes, removed the hazardous waste from their original containers and consolidated (bulked) the hazardous waste into the 55 gallon drum. After consolidating the various hazardous wastes, a fire and explosion occurred within the drum causing the lid to blow off and strike the sprinkler head. The sprinkler systems extinguished the fire and fire department was notified. The water was collected in totes and the drum was involved was over packed into a salvage drum properly managed at an off-site facility. No one was injured as a result of this incident and the sprinkler head was replaced.

On December 13, 2013, Ohio EPA met with you and verified that the incident was limited to the one drum in the flammable storage area during a focused compliance inspection (FCI). You showed us the drum had been over packed into a salvage drum; the broken sprinkler which had been repaired; and the wall in the storage area which had been scorched by the fire from the drum had been re-painted

Southwest District Office • 401 East Fifth Street • Dayton, OH 45402-2911
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Mr. Daniel McCabe
March 10, 2014
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On December 26, 2013, Ohio EPA received a letter containing information from you detailing the drum contents. We also received a letter from you on January 13, 2014, explaining how EEI proposes to prevent a fire/explosion like this from happening again.

Based on Ohio EPA's review of details provided by EEI on December 13 and 26, 2013, and January 13, 2014, EEI is in violation of the following permit conditions and rules regarding the fire and explosion that occurred at EEI on December 11, 2013:

1. **General Waste Analysis Plan, Condition B.3(a) & (b) and Ohio Administrative Code (OAC) Rule 3745-54-13:** The Permittee must obtain a detailed chemical and physical analysis of hazardous or nonhazardous waste prior to treating, storing or disposing of them & follow the procedures described in the waste analysis plan found in Section C of the permit application and the terms and conditions of this permit.

EEI failed to comply with Conditions B3(a) & (b) and OAC Rule 3745-54-13 when the fire and explosion on December 11, 2013, involved a drum storing bulked (mixed) hazardous waste at EEI. One of the materials Wastes involved in the fire/explosion included an unknown household hazardous waste and another was a lab pack from Lancaster Police Department that had waste codes designated as "varies".

EEI must obtain detailed chemical and physical analysis prior to storing hazardous waste. Specifically, EEI must identify how it plans on obtaining a detailed chemical and physical analysis of household hazardous waste before mixing it with hazardous waste.

Also, Ohio EPA requests EEI provide information as to how EEI identified the drum involved in the incident as "liquid paint related material." You have consistently identified this drum as a flammable solid drum and most materials that were bulked in this drum did not appear to be paint related (for example charcoal, ibuprofen, lycopodium powder (LP)).

EEI must explain the rationale it used to identify this drum and must follow the procedures set forth in the permit/permit application for hazardous waste consolidation (bulking).

2. **Special Container Provisions for Ignitable or Reactive Waste, Condition C.10(a) & (c) and OAC Rule 3745-54-17(A), (B) and (C):** The Permittee must store ignitable or reactive waste in accordance with OAC Rules 3745-54-17 and 3745-55-76 and take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and shall follow the storage procedures specified in Section F of the permit application.



Mr. Daniel McCabe
March 10, 2014
Page 3 of 7

EEL failed to comply with Conditions C.10(a) & (c) and OAC Rule 3745-54-17(A), (B) and (C) as follows:

- (a) 3745-54-17(A)- EEL had ignitable and reactive waste accidentally ignite when a fire and explosion occurred on December 11, 2013, involving a drum storing bulked (mixed) hazardous waste at EEL.

The drum was storing, at a minimum, ignitable (D001) and reactive (D003) hazardous wastes as described in OAC Rules 3745-51-21 and 3745-51-23. Based upon information provided by EEL, the drum held LP reactive hazardous waste from VA Western Community College and ignitable hazardous waste from Quitman High School, Weston high School, VA Western Community College, YRC North American Transportation and Heraeus Cermalloy. Additionally, one of the materials wastes involved in this fire/explosion was an unknown household hazardous waste and a hazardous waste lab pack from Lancaster Police Department that had hazardous waste codes designated as "varies".

- (b) 3745-54-17(B) – EEL was unable to prevent a reaction which generated a fire/explosion on December 11, 2013, involving a drum storing bulked (mixed) hazardous waste at EEL. EEL failed to insure that the ignitable and reactive hazardous wastes, as described above, were compatible and would not pose a risk of a fire or explosion, damage to the integrity of the drum and the Facility, or threaten human health and the environment.

- (c) 3745-54-17(C) – EEL failed to document how consolidating the hazardous wastes described above would be safe and not cause an accidental ignition or a reaction which would cause the ignition of the hazardous waste. EEL must demonstrate how EEL will comply with paragraphs (A) or (B) of this rule identified above.

Additionally, EEL must identify how it will modify its procedures for bulking ignitable hazardous waste in a manner that ensures that unknown and/or reactive hazardous wastes are not mixed together and stored in a manner that can cause accidental ignition or reaction of ignitable or reactive waste.

Also, the Waste Spill Clean-up Resin Liquid from YRC North American Transportation was a corrosive D002, as described in OAC rule 3745-51-22, hazardous waste. EEL must explain in further detail what rationale (e.g., was this hazardous waste mixed in with the other hazardous waste in the same container for a certain purpose and how were the wastes' compatibilities assessed?) was used to mix this hazardous waste with the other hazardous waste in the drum.



Mr. Daniel McCabe
March 10, 2014
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3. **Proper Operation and Maintenance/Design and operation of Facility, Condition A.9 and OAC Rule 3745-50-58(E)/OAC rule 3745-54-31:** The Permittee must, at all times, properly operate and maintain the facility (and related appurtenances) to achieve compliance with the terms and conditions of this permit, including operated to minimize the possibility of a fire, explosion or unplanned release. Proper operation and maintenance includes effective management practices, appropriate funding, adequate operator staffing and including appropriate quality assurance/quality control procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the terms and conditions of this permit.

EEL failed to comply with Condition A.9 and OAC Rules 3745-50-58(E) and 3745-54-31 when the fire and explosion on December 11, 2013, involved a drum storing bulked (mixed) hazardous waste at EEL. EEL stored various types of ignitable, reactive and unknown hazardous wastes in a single drum, as described in violations 1 and 2 above, without ensuring these hazardous wastes were compatible with each other to minimize the potential for a fire and explosion.

EEL must identify how it plans to achieve proper operation and maintenance by using appropriate quality assurance/quality control procedures to minimize the possibility of a fire, explosion or unplanned release.

4. **Duty to Comply, Condition A.5 and OAC Rule 3745-50-58(A):** The Permittee must comply with all applicable provisions of ORC Chapter 3734, all applicable hazardous waste rules, and all terms and conditions of this permit, except to the extent and for the duration that laws of the State of Ohio authorize such noncompliance. Any permit noncompliance, other than noncompliance authorized by the laws of the State of Ohio, constitutes a violation of ORC Chapter 3734 and is grounds for enforcement action, revocation, modification, denial of a permit renewal application or other appropriate action.

EEL failed to comply with Condition A.5 and OAC Rule 3745-50-58(A) by not complying with all terms and conditions of EEL's permit and by not complying with applicable Sections of EEL's Part B Permit Application.

EEL must take steps to comply with all terms and conditions of the permit.

On December 4, 2013, Ohio EPA received EEL's electronic copy of your response to our November 18, 2013, NOV. This response contained detail about EEL's efforts train supervisors and employees about the use of spark proof tools on ignitable waste and retraining of staff involved with profiling hazardous waste. Based upon Ohio EPA's review of your response, EEL has adequately demonstrated abatement of the following



Mr. Daniel McCabe
March 10, 2014
Page 5 of 7

violations cited in the February 8, 2103 NOV associated with a fire and explosion that occurred at EEI on December 28, 2012.

- (2) - 2/8/13 NOV **Duty to Mitigate, Condition A.8 and OAC Rule 3745-50-58(D) –** EEI was able to identify in your December 4, 2013, response what steps had been taken to prevent another incident like the one on December 28, 2012.
- (3) - 2/8/13 NOV **Proper Operation and Maintenance, Condition A.9 and OAC Rule 3745-50-58(E) –** EEI was able to identify in your December 4, 2013, response what actions you have taken and staff retraining to ensure that any shift supervisor will require the use of spark proof tools on ignitable waste.
- (4) - 2/8/13 NOV **Design and Operation of Facility, Condition B.1(a) and OAC Rule 3745-54-31 –** EEI was able to identify in your December 4, 2013, response what actions you have taken and staff retraining to ensure that your employees will use spark proof tools on ignitable waste.
- (5) - 2/8/13 NOV **General Waste Analysis Plan, Condition B.3(a) & (b) and OAC Rule 3745-54-13 –** EEI was able to demonstrate in your December 4, 2013, response that it had updated and retrained the Approval Chemist, QA Technicians and Laboratory Personnel on variations in profiled waste that may require an updated or new waste profile.
- (6) - 2/8/13 NOV **General Requirements for Ignitable, Reactive, or Incompatible Wastes, Condition B.7(a) & (c) and OAC Rule 3745-54-17 –** EEI was able to identify in your December 4, 2013, response what actions you've taken to train all supervisors to ensure that spark proof tools are used when handling Ignitable waste.
- (7) - 2/8/13 NOV **Special Container Provisions for Ignitable Waste, Condition C.10(a) & (c) and OAC Rule 3745-54-17(a) –** EEI was able to identify in your December 4, 2013, response what actions you've taken to ensure that spark proof tools are used when handling ignitable waste.



Mr. Daniel McCabe
March 10, 2014
Page 6 of 7

EEL continues to be in violation of the following permit conditions and rules cited in the February 8, 2013, and June 5, 2013, NOVs associated with a fire and explosion that occurred at EEL on December 28, 2012:

- (1) - 2/8/13 NOV **Duty to Comply, Condition A.5 and Ohio Administrative Code (OAC) Rule 3745-50-58(A)** – EEL must continue to take steps needed to comply with all terms and conditions of their permit.
- (1) - 6/5/13 NOV **Unlawful Treatment of Hazardous Waste, ORC§ 3734.02(E) and (F)** – No further action is required of EEL with regard to this violation.
- (4) - 6/5/13 NOV **Anticipated Noncompliance, Condition A.17 and OAC Rule 3745-50-58(L)(2)** –EEL must continue to take to take steps to comply with all terms and conditions of their permit. Any changes must be to EEL's permit must comply with OAC 3745-50-51.

The investigation into the December 28, 2012 and December 11, 2013, incidents at EEL are ongoing. Ohio EPA will continue to review all pertinent information to determine EEL's compliance with all state hazardous waste regulations and conditions of its Ohio hazardous waste facility installation and operation permit. Due to the nature and extent of the violations, EEL has been referred to the Division of Materials and Waste Management's Central Office for escalated enforcement.

EEL needs to continue to take the necessary measures to return to compliance with Ohio's hazardous waste laws and its Ohio hazardous waste installation and operation permit issued September 30, 2009. Within 14 days of receipt of this letter, EEL is required to provide documentation to this office including the steps taken to abate the remaining violations cited above in the February 8, 2013, and June 5, 2013, NOVs and the additional ones cited in this letter regarding the December 11, 2013, fire involving hazardous waste. Documentation of steps taken to return to compliance includes, but is not limited to, written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to pam.hull@epa.ohio.gov.

Please be advised that violations cited above will continue until properly abated. Failure to comply with Chapter 3734 of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, EEL is requested to submit written correspondence of the steps that will be taken to attain compliance.



Mr. Daniel McCabe
March 10, 2014
Page 7 of 7

Failure to list specific deficiencies in this communication does not relieve EEI from the responsibility of complying with the approved permit and all applicable hazardous waste regulations. This letter does not relieve EEI from liability for any past or present violations of Ohio's hazardous waste laws.

Should you have any questions, please call me at (937) 285-6091.

Sincerely,

Pam Hull
District Representative
Division of Materials and Waste Management

cc: Bonnie Buthker, SWDO, District Chief
Todd Anderson, Ohio EPA, Legal
Bruce McCoy, CO-DMWM
Timothy Kern, Ohio Attorney General's Office
Russ Brown, SWDO-DMWM
George Strobel, SWDO-DMWM
Robyn Winstead, SWDO-DMWM/SWDO Facility File

PH/bp



ENVIRONMENTAL ENTERPRISES INCORPORATED

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EPA ID#: OHD 083377010



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March 18, 2014

Pam Hull

Ohio EPA
Southwest District Office
401 East 4th Street
Dayton, Ohio 45402-2911

Dear Ms. Hull

We received your letter of March 10, 2014 on March 12, 2014 and offer the following response within 15 days as you requested.

GENERAL COMMENT

After further reviewing all wastes combined into the subject drum and further interviews of personnel involved, we did not find that any of the materials were incompatible. It is our opinion, based on a review of the chemical and physical properties of all materials in the drum, that the 9 gallons of isocyanate based adhesive released carbon dioxide and heat as it cured and the resulting pressure build-up blew off the lid. We did not identify any other waste with which it would have reacted. It should be noted that isocyanates decompose and release carbon dioxide as they age with or without mixing with other materials. The black "scorch" mark on the wall, we believe, was due to the graphite and charcoal being ejected from the drum when the pressure was released.

SPECIFIC VIOLATION RESPONSES

1. General Waste Analysis Plan, B.3(a) & (b) and Ohio Administrative Code (OAC)

Rule 3745-54-13

Our January report indicated that one "unknown" household hazardous waste" was added to the drum in question. By unknown, we meant that at the time of writing the response we did not know specifically what material was added to the drum. We did not mean to suggest that





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the material was actually an unlabeled container, the contents of which were unknown. Consumer product labeling provides the detailed information needed to safely evaluate and process household wastes since the label includes all the hazardous ingredients of the product formulation. General precautions are also provided on consumer product labels such as "Flammable", "Combustible" or "Corrosive". Warnings about mixing are also provided as appropriate or to "keep away" from other products or sources of ignition. Flammable solids received from household are typically items such as flares, graphite, moth balls (naphthalene or p-dichlorobenzene) and charcoal. Therefore, we believe the product label allows for adequate identification of chemical and physical properties and will continue to use such information in handling household hazardous waste. In addition, refresher training for all employees in 2014 will review incompatibles and identification and properties of consumer products. One such session has already taken place and others are planned for in April, May and August. Also, an Environmental Health and Safety Reference Manual is available for all employees on all shifts. This manual includes a section on incompatibles and commonly received wastes. See attachment 1.

The profile for the waste from the Lancaster Police Department did indicate that the waste code varies. Packing lists attached to the profile are reviewed during the approval process which includes a review of waste codes. This approval process is described in Section C.2(1) thru C.2(1)c and acceptance is described in C.2a(2)(a) and (b). The manifest indicated the waste code for each lab pack item received. See attachment 2. "D003" was listed for container 13-61088 and "None" for container 13-61085.

The attached printout of the operating record for the drum which caused the incident and all containers consolidated into the drum is included as attachment 3. You can see that the containers received from Lancaster PD, drums # 13-61085 and #13-61088, also indicate the waste codes D003 and None in the operating record. This is the same information on the barcode label used by the technicians processing the waste to identify the contents. Technicians processing lab pack drums also use the packing list attached to the drums to determine which materials to bulk together or repackage.

The excerpt from the operating log, also indicates that drum # 13-63887 from Virginia Western Community College was consolidated into the drum which is the subject of this incident. The manifest in section 9b line 2 describes this drum as charcoal. See attachment 4. The packing list for this drum further describes that the container received contained 200 grams animal charcoal powder and 10 grams charcoal. See attachment 5.

Charcoal can become reactive and spontaneously combust in moist air or if wetted and allowed to air dry. Neither of these conditions were present in this case. The other drums listed on the operating report did contain D001 wastes, none of which are incompatible. There were no



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oxidizers or corrosives contained in the drums received which were bulked into the subject drum.

The drum involved in the incident was identified as Paint Related Material since nearly 70% of the waste in the drum was Cover Coat, which is a paint related material, UN1263. See the attached MSDS, attachment 6 for Cover Coat; Section 14, Transportation Information.

2. Special Container Provisions for Ignitable or Reactive Waste, Condition c.10(a) & (c) and OAC Rule 3745-54-17 (A), (B) and (C).

As indicated above we did not find that any of the wastes which were consolidated were incompatible and precautions were taken to prevent ignition of the flammable and reactive wastes as required in 3745-54-17 (A) such as grounding and bonding during bulking and protecting from sources of ignition.

The nature of the isocyanates contained in the adhesive however caused an over pressurization of the drum and likely heated the contents to the ignition point of one of the constituents. When the pressure caused the lid to fail, the exposure of the heated contents to air resulted in a small fire as described by one of our employees. This seems consistent with the fact that only one sprinkler head was activated. Had a larger fire occurred, we would have expected the activation of additional sprinklers.

The reaction of isocyanates is typically catalyzed by the addition of water, ammonia or amines. None of the materials bulked contained water, ammonia or amines as shown on the packing lists and msds sheets.

The profile indicates that the waste was generated from a spill clean-up with a D001 waste code. It did not indicate that it came into contact with water, ammonia or an amine. Therefore, there was no reason to suspect that it would react as it appears it did. The msds also indicates that the material is stable and that it is incompatible with oxidizers and corrosives, neither of which were combined with this isocyanate waste. See attachment 7, Section 10.

Therefore, in order to comply with 3745-54-17 (B) 1, future bulk isocyanates, resulting from EEI processes, will be repacked, as is, without bulking or be bulked separately and employ a pressure relief bung. If they are bulked, only like isocyanates will be mixed together and a pressure relief bung will be used while the drum is in storage.

While EEI did receive corrosive wastes from YRC North American, the waste bulked into the subject drum from YRC was a D001 waste as shown on the manifest. This is the isocyanate



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bearing material described above. It was not the D002 waste as you question in your letter of March 10, 2014. These two containers from YRC were the only ones bulked into the incident drum as shown on the operating record. Only one of the four corrosive drums received from YRC (13-61117) has been processed which occurred on February 20, 2014.

The other constituents of this resin/adhesive are Toluene, Xylene, Hexane, Heptane, Naphtha, Ethyl benzene and Cyclohexane all of which are ignitable not corrosive.

3. **Proper Operation and Maintenance/Design and operation of Facility. Condition A.9 and OAC Rule 3745-50-58(E) /OAC Rule 3745-54-31**

EEL followed all procedures of its analysis plan regarding approval of wastes, in particular sections C.2a(1) and C.2f. and Section D.9a regarding processing of lab packs. These procedures provide for three reviews of the packing list for acceptability and compatibility. A fourth review is then provided at the time the materials are unpacked by the technicians. The process of bulking also includes an observation of compatibility at the time of processing by adding materials in small amounts and looking for signs of reaction such as heat, bubbling, steam, foaming, etc. Should such signs be observed, addition is stopped and the reaction allowed to subside and the waste initiating the reaction is handled separately. In this case, all checks were passed.

Refresher training will review incompatibles and how to recognize sign of reaction.

4. **Duty to Comply, Condition A.6 and OAC Rule 3745-50-58(A)**

EEL is committed to compliance with all Permit conditions and OAC Rules. The refresher training already schedule for this year and the segregation of isocyanates and use of pressure relief bungs will return EEL to full compliance.

Sincerely;
Environmental Enterprises Inc.

Daniel J. McCabe. P.E.
President

Attachments

gmd

File: c:\mydocuments\oepra reply 3.2014 nov.doc



ENVIRONMENTAL ENTERPRISES INCORPORATED

TREATMENT FACILITY
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EPA ID#: OH083377010
January 8, 2014



OFFICE / LABORATORY
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Ms. Pam Hull
Division of Materials and Waste Management
Ohio EPA
SWDO
401 East 4th Street
Dayton, OH 45402

COPY

Dear Pam,

As a follow-up to our conversation, a change that could have a benefit to prevent this from happening on bulked paint related materials involve the segregation of some materials in their original container and sending them off-site rather than bulking them. The Ross approval we have for Styrenes and Part A & B Components, including isocyanates, is for a loose pack in the original containers. This is an acceptable treatment method and is in use within the lab pack depack area.

The over pressurization of drum containers can occur on an infrequent basis from a number of causes, including the bacterial degradation of organic material or the slow evolution of hydrogen, nitrogen or atmospheric gases including CO₂ and Oxygen. Pressure can build up until the lid or container shows some deformity. When discovered, these are vented from the side of the drum in a safe manner. The venting is done by loosening a top bung, which typically releases the pressure. The same goes for pressurized totes. For continuing gas evolutions, both drums and totes can use a vent bung for a periodic release of gas on an intermittent basis. Once the gas is released the bung resets itself.

As a remediation measure for the avoidance of future reactions of isocyanates; we are suggesting that we segregate and ship these offsite for incineration.

If you have any questions on this, please do not hesitate to call me. However, this is our suggested Remedial Action to prevent the reoccurrence of pressurized drums due to internal reactions from this type of material. As you recall, the isocyanate concentration in the paints was only 1-5% and as such, would not be expected to create a problem.

Sincerely,
ENVIRONMENTAL ENTERPRISES, INC.

Daniel J. McCabe, P.E.
President



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CHARLESTON CHIENG-KUNG WANG

Attorneys and Counselors At Law

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Telephone: 513/793-7776 Facsimile: 513/793-7779

Charleston C. K. Wang

Of Counsel: Mary Joan Reutter

FOR IMMEDIATE RELEASE

RE: ACCIDENT AT ENVIRONMENTAL ENTERPRISES INC. DATED 12/28/2012

All OSHA citations for the accident at Environmental Enterprises, Inc. (EEI) dated 12/28/2012, are under contest by the employer. By reason of the contest, litigation is presently pending before an Administrative Law Judge of the Occupational Safety and Health Review Commission. OSHA has no proven safety violations at EEI's facility. The matter is contested and under pending litigation. The facts of these matters will come to light and be decided in court.

email address: wanglaw@sprynet.com
<http://www.wanglaw.net>



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

November 18, 2013

CERTIFIED MAIL

Mr. Daniel McCabe
Environmental Enterprises, Inc.
10163 Cincinnati-Dayton Road
Cincinnati, Ohio 45241

**RE: Environmental Enterprises Inc.
Notice of Violation
NOV
RCRA C – Hazardous Waste
Hamilton County
OHD083377010**

Dear Mr. McCabe:

On September 30, 2013 and October 2, 2013, the Ohio Environmental Protection Agency (Ohio EPA) conducted a semi-annual Compliance Evaluation Inspection (CEI) at Environmental Enterprises, Inc.'s (EEI) Cincinnati, Ohio facility. EEI is a permitted commercial hazardous waste treatment and storage facility. EEI is permitted to store 120,275 gallons of hazardous waste at any given time in containers located in 30 areas. EEI is limited to treating 40,000 tons of hazardous waste per year in containers and 6050 gallons of hazardous waste per day in tanks. Warren Taylor and you represented EEI. Jeff Smith, George Strobel and I represented Ohio EPA. The purpose of the inspection was to determine EEI's compliance with laws as found in Chapter 3734, of the Ohio Revised Code (ORC) and Chapter 3745, of the Ohio Administrative Code and EEI's Ohio hazardous waste installation and operation permit issued September 30, 2009. Ohio EPA's inspection included an inspection of facility operations and a review of training records, tank, container and emergency equipment records, manifests and waste profiles.

Ohio EPA found the following violations during the September 30, 2013 CEI:

- 1. OAC Rule 3745-52-34(A)(2), Accumulation time of hazardous waste: Hazardous waste must have the accumulation date clearly marked on each container.**

During Ohio EPA's September 30, 2013 CEI, EEI failed to mark an accumulation date the roll-off box outside the Main Building containing organic waste toxic solids.

On October 3, 2013, EEI provided Ohio EPA photo documentation that the roll-off box has since been dated correctly; This action **abates the violation cited** on September 30, 2013.

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Environmental Enterprises, Inc.
November 18, 2013
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2. OAC Rule 3745-52-34(A)(3), Accumulation time of hazardous waste: Containers of hazardous waste must be labeled with the words "Hazardous Waste"

During Ohio EPA's September 30, 2013, CEI, EEI failed to have a hazardous waste label on the roll-off box outside the Main Building containing organic waste toxic solids.

On October 3, 2013, EEI provided Ohio EPA photo documentation that the roll-off box has since been labeled correctly; This action **abates the violation cited** on September 30, 2013.

On August 19, 2013, Ohio EPA received EEI's response to the February 8, 2013 and June 5, 2013, Notices of Violation (NOVs). EEI's response provided a discussion of the status of each violation cited in the NOVs. Based on Ohio EPA's review of this letter, waste analysis and training record information reviewed during Ohio EPA's CEI on October 2, 2013, and waste analysis profile information provided via email on November 1, 2013, EEI has adequately demonstrated abatement of the following violations cited in the June 5, 2013, NOV:

- (2) **General Waste Analysis Plan (WAP), Conditions B.3(b) and (c) and OAC Rule 3745-54-13** – EEI is now updating their hazardous waste profiles annually and has retrained their waste profiling staff that this needs to be done annually.
- (3) **Personnel Training, Condition B.6 and OAC Rule 3745-54-16** – EEI is now following the five provisions of the personnel training program, including 1) initial 40-hour classroom training, 2) receive a Protective Measures Determination review, 3) receive a Job Hazard Analysis review, 4) receive on the job training, and 5) receive annual classroom refresher training.
- (5) **Information to be Maintained at the Facility, Conditions A.28(a)(i)&(v)** - EEI is now complying with the specific elements of their WAP and personnel training plan identified above (see violation 2 and 3 above).

EEI continues to be in violation of the following permit conditions and rules cited in the February 8, 2013 and June 5, 2013, NOVs:

- (1) - 2/8/13 NOV **Duty to Comply, Condition A.5 and Ohio Administrative Code (OAC) Rule 3745-50-58(A)** – EEI must continue to take steps needed to comply with all terms and conditions of their permit.
- (2) - 2/8/13 NOV **Duty to Mitigate, Condition A.8 and OAC Rule 3745-50-58(D)** – What has EEI done since the incident to prevent any significant adverse impact on human health or the environment at the facility?



Environmental Enterprises, Inc.
November 18, 2013
Page 3 of 4

- (3) - 2/8/13 NOV **Proper Operation and Maintenance, Condition A.9 and OAC Rule 3745-50-58(E)** – What actions has EEI taken to ensure that any shift supervisor at EEI will require the use of spark proof tools on ignitable (D001 as defined in OAC 3745-51-21) waste? At a minimum, this should include retraining staff.
- (4) - 2/8/13 NOV **Design and Operation of Facility, Condition B.1(a) and OAC Rule 3745-54-31** – What actions has EEI taken to ensure that their employees will use spark proof tools on ignitable waste (D001 as defined in OAC 3745-51-21)? At a minimum, should include retraining staff.
- (5) - 2/8/13 NOV **General Waste Analysis Plan, Condition B.3(b) and OAC Rule 3745-54-13** – What actions has EEI taken to ensure that each waste stream matches its waste profile? At a minimum, this should include retraining staff responsible for profiling waste that the profile should match hazardous waste it's describing.
- (6) - 2/8/13 NOV **General Requirements for Ignitable, Reactive, or Incompatible Wastes, Condition B.7(a) & (c) and OAC Rule 3745-54-17** – What actions has EEI taken to ensure that any shift supervisor at EEI provides and requires the use of a spark proof tool on ignitable waste (D001 as defined in OAC 3745-51-21)? At a minimum, should include retraining staff.
- (7) - 2/8/13 NOV **Special Container Provisions for Ignitable Waste, Condition C.10(a) & (c) and OAC Rule 3745-54-17(a)** – What actions has EEI taken to ensure that any shift supervisor at EEI provides and requires the use of a spark proof tool on ignitable waste (D001 as defined in OAC 3745-51-21)? At a minimum, should include retraining staff.
- (1) - 6/5/13 NOV **Unlawful Treatment of Hazardous Waste, ORC § 3734.02(E) and (F)** – Return to compliance will be achieved through administrative means.
- (4) - 6/5/13 NOV **Anticipated Noncompliance, Condition A.17 and OAC Rule 3745-50-58(L)(2)** – EEI must continue to take to take steps to comply with all terms and conditions of their permit. Any changes must be to EEI's permit must comply with OAC 3745-50-51.

As stated in the February 8, 2013, NOV and restated in the June 5, 2013, NOV the investigation into the December 28, 2012, incident at EEI is ongoing. Ohio EPA will continue to review all pertinent information to determine EEI's compliance with all state hazardous waste regulations and conditions of its Ohio hazardous waste facility installation and operation permit. Due to the nature and extent of the violations, EEI has been referred to the Division of Materials and Waste Management's Central Office for escalated enforcement.



Environmental Enterprises, Inc.
November 18, 2013
Page 4 of 4

EEL needs to continue to take the necessary measures to return to compliance with Ohio's hazardous waste laws and its Ohio hazardous waste installation and operation permit issued September 30, 2009. Within 14 days of receipt of this letter, EEL is required to provide documentation to this office including the steps taken to abate the remaining violations cited above in the February 8, 2013 and June 5, 2013, NOVs. Documentation of steps taken to return to compliance includes, but is not limited to, written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to pam.hull@epa.ohio.gov.

Please be advised that violations cited above will continue until properly abated. Failure to comply with Chapter 3734 of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, EEL is requested to submit written correspondence of the steps that will be taken to attain compliance.

Failure to list specific deficiencies in this communication does not relieve EEL from the responsibility of complying with the approved permit and all applicable hazardous waste regulations. This letter does not relieve EEL from liability for any past or present violations of Ohio's hazardous waste laws.

Enclosed you will find a copy of the checklists completed as part of the inspection. Should you have any questions, please call me at (937) 285-6090.

Sincerely,

A handwritten signature in cursive script that reads 'Pam Hull'.

Pam Hull
District Representative
Division of Materials and Waste Management

Enclosure

ec: Bonnie Buthker, District Chief, Ohio EPA-SWDO
Todd Anderson, Ohio EPA-Legal
Bruce McCoy, CO-DMWM
Russ Brown, SWDO-DMWM
George Strobel, SWDO-DMWM
Robyn Winstead, SWDO-DMWM/SWDO Facility File

PH\bp



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December 3, 2013

CS-17

Ms Pam Hull
Ohio EPA-SWDO
401 East 5th Street
Dayton, OH 45402-2911

Dear Ms. Hull:

Environmental Enterprises, Inc. (EEI) is in receipt of your letter dated November 18, 2013, relative to Ohio EPA's inspections of September 30, 2013, and October 2, 2013. EEI appreciates your acknowledgement regarding the submitted information that addressed the profile recertification, training deficiencies and records retention. These issues have been resolved with the operational changes that were made.

In regards to the NOV's cited during the February 8, 2013, and June 5, 2013, inspections listed below are the corrective actions EEI has taken.

1. **Duty to Comply, Condition A.5 and Ohio Administrative Code (OAC) Rule 3745-50-58(A)**-EEI agrees with the Ohio EPA on the Duty to Comply with all aspects of our Part B Permit and have made significant efforts to do so.
2. **Duty to Mitigate, Condition A.8 and OAC Rule 3745-50-58(D)**-The steps outlined below are the measures taken at the facility to mitigate conditions that could have an impact on human health and the environment. Since the unfortunate accident of December 28, 2012, EEI has strived to improve the operational and safety aspects of the facilities operations. This activity results from a continuing review of the safety practices and systems.
 - EEI has purchased 5 new safety rated forklifts for use at the facility, which reduce the potential of a forklift creating a source of ignition from a release of flammable or ignitable materials.
 - EEI has updated training programs for all personnel that meet the requirements contained within the Part B and added to the quality of training materials.
 - Although not required, EEI installed a new air compressor and nitrogen generator to provide a nitrogen blanket on the Annex Shredder as a precautionary measure. EEI has also installed LEL and Oxygen Sensors and an alarm system in this enclosure to detect when a hazardous condition would occur.



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- EEI has revamped the fire suppression systems within the facility. This involved approximately 2,400 sprinkler heads and replacing some sprinkler lines.
- Although not required, a new dry powder system replacing the original Purple K fire suppression system for the water reactive storage area and reactor room was installed.
- EEI purchased a new air powered saw, which is typically used in refinery type situations for cutting non-ferrous containers that may contain flammable or ignitable materials.
- Although not requested, EEI has installed new fire doors in three different areas replacing older fire doors and patched any openings in the fire separation walls.
- Several elevators have been upgraded to function better with improved safety.
- Although not required, EEI installed a new air scrubber on the Solidification Dock.
- For security, EEI has installed a new gate at the Salway Park entrance, four new security cameras and replaced the fence at Salway Park.
- EEI has added new lighting to the parking lot and plant interior.
- EEI has developed a New Hire Employee Form, so that all the aspects of hiring a new employee will be better documented. This will assist in ensuring proper documentation of each new employee's training status.
- Although not requested, EEI has added flame arrestors to the evaporator burner as a precautionary measure.
- Although not required, EEI has added new Metal-X Powder Extinguishers for Sodium and Lithium Metals.
- EEI has added to our supply of spark proof tools.
- EEI added static discharge reels to the flammable room for ease of use.

While not an exhaustive list, this represents significant improvements in safety features at the facility. EEI is open to any suggestions for future improvements from the Ohio EPA.



3. **Proper Operation and Maintenance, Condition A.9 and OAC Rule 3745-50-58(E)**-All EEI supervisors have been given training to ensure the requirements for using spark proof tools are met. *See attached Supervisor Training Sign-In Sheet and Program.*
 - EEI has conducted Supervisor Training on the use of spark proof tools in conjunction with a review of the Bonding and Grounding Procedures and other safety issues relating to ignitable wastes including metal powders.
 - The training course on Bonding and Grounding addressed the training of Shift Supervisors and employees on the proper use of tools working on ignitable waste. This training was conducted in eight sessions the week of December 2, 2013.
4. **Design and Operation of Facility, Condition B.1(a) and OAC Rule 3745-54-31**-All EEI employees have been given training to ensure the use of spark proof tools. *See attached Employee Training Sign-In Sheet and Program.*
 - EEI has conducted Employee Training on the use of spark proof tools in conjunction with a review of the Bonding and Grounding Procedures and other safety issues relating to ignitable wastes including metal powders.
 - The training course on Bonding and Grounding address the training of Shift Supervisors and employees on the proper use of tools working on ignitable waste. This training was conducted in eight sessions the week of December 2, 2013.
5. **General Waste Analysis Plan, Condition B.3(b) and OAC Rule 3745-54-13**-EEI has updated training on the Waste Analysis Plan for the Approval Chemist's, QA Technicians and Laboratory Personnel on what constitutes a minor variation or off specification of the Waste Profile and the variation required before an update or new profile is required. This was conducted by Warren Taylor and Mike Yearly on December 3, 2013. *See attached training documents.*
6. **General Requirements for Ignitable, Reactive or Incompatible Wastes, Condition B.7(a) & (c) and OAC Rule 3745-54-17**-All EEI supervisors have received the training needed to ensure the requirements of spark proof tools are used. They have also signed a verification form stating "I understand that my failure to comply with EEI's safety policy and procedure for handling ignitable wastes or my failure to enforce this policy may result in dismissal or at a minimum a 3-day suspension without pay". *See attached form.*
7. **Special Container Provisions for Ignitable Wastes, Condition C.10(a) & (c) and OAC Rule 3745-54-17(a)**- All EEI supervisors have received the training needed to ensure the requirements of spark proof tools are used. They have also signed a verification form stating "I understand that my failure to comply with EEI's safety policy and procedure for handling ignitable wastes or my failure to enforce this policy may result in dismissal or at a minimum a 3-day suspension without pay". *See attached form.*

EEI believes that these measures successfully address Ohio EPA's concerns in reducing the possibility of an accident due to sparking tools at our facility.



1. **Unlawful Treatment of Hazardous Waste, ORC§ 3734.02(E) and (F)**-EEI believes that the violations that are outlined in your letter have been resolved. EEI is requesting a meeting with Ohio EPA in order to facilitate an understanding of any concerns that might make our Part B Permit a document that will assist Ohio EPA in their regulatory process as well as facilitate a better operation by EEI.

Sincerely,
ENVIRONMENTAL ENTERPRISES, INC.

A handwritten signature in blue ink, appearing to read 'Daniel J. McCabe'.

Daniel J. McCabe, P.E.
President

Attachments



ENVIRONMENTAL ENTERPRISES INCORPORATED

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December 23, 2013

Ms. Pam Hull
Division of Materials and Waste Management
Ohio EPA
SWDO
401 East 4th Street
Dayton, OH 45402

Dear Pam,

This is a follow-up to the accident that occurred on December 11, 2013, at our facility located at 4650 Spring Grove Avenue, Cincinnati, OH.

Enclosed, please find a copy of the completed Incident Report. By way of explanation, I have attached Inventory Sheets on the composition of the drum that reacted and the MSDS's concerning them. As discussed, the incident was caused by a reaction inside the Flammable Solid drum, which caused the drum to over pressurize. The lid blew off and hit a sprinkler line. No one at the facility saw a flame or fire, however they did smell smoke. The reaction resulted in an over pressurization of a drum not an explosion. Approximately, 1,250-gallons of sprinkler water was generated that did not escape containment. There were no injuries and no damage to the facility. There was no threat to the environment or human health outside the facility. The Contingency Plan was not implemented. The drum was removed and placed in an overpack. The sprinkler head was replaced and the floor was cleaned.

While there is no clear explanation for the reaction in the drum, it appears that the most likely cause was a reaction of isocyanates, which are capable of heat generation and gas evolution.

Resins and paint products typically have isocyanates in them. The Household Hazardous Waste Flammable Solid was not defined. All the materials contained within the drum are capable of combustion and burning. The resins are most likely the cause of the pressurization and heat generation. There were no corrosives, oxidizers or water reactives in the drum, which would create an incompatibility.

There were no prior occurrences of a fire in this area of the facility.



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If you have any questions concerning this or the attachments, please do not hesitate to call me.

Sincerely,
ENVIRONMENTAL ENTERPRISES, INC.

Daniel J. McCabe, P.E.
President

Attachments



Environmental Enterprises, Inc.
Warehouse and Treatment Center
4600-4650 Spring Grove Avenue
Cincinnati, Ohio 45232
Operator: Dan McCabe

INCIDENT REPORT

TIME: 11:15pm

DATE: December 11, 2013

Type of Incident: Spill _____ Fire X Explosion _____

-If Spill, did it escape containment? Yes _____ No X

-If yes, to: Ground _____ Sewer _____ Surface Water _____

-If to sewer notify MSD at 513-557-7000 or 513-352-4900

-If to surface water, notify Coast Guard at 513-921-9033

Name of Material(s) Involved: Paint Related Material

Quantity Involved: 55-gallons Source: _____

Any Injuries? Yes _____ No X If yes, number and types _____

Is State or local agency help needed? Yes _____ No X

Is there a threat to human health or environment outside the facility?

Yes _____ No X

-If Yes, is evacuation needed: Yes _____ No X

-If Yes, notify: City of Cincinnati Police: 513-765-1212

Fire: 513-541-9645

National Response Center: 1-800-424-8802

OEPA Emergency Response: 1-800-282-9378

Summary of Action Taken:

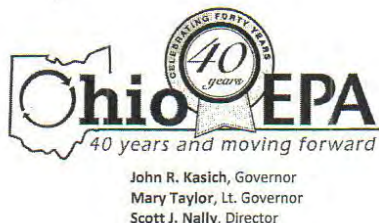
Overpacked drum, pumped sprinkler water into totes. Replaced the sprinkler and cleaned the floor.

Incident under control: Date: December 12, 2013 Time: 1:00 am

By: [Signature]

Date: 12-12-13

Time: 4:30pm



February 8, 2013

**RE: Environmental Enterprises Inc.
Permitted Treatment and Storage Facility
OHD083377010
Hamilton County
Notice of Violation**

CERTIFIED MAIL

Mr. Daniel McCabe
Environmental Enterprises, Inc.
10163 Cincinnati-Dayton Road
Cincinnati, OH 45241

Dear Mr. McCabe:

Ohio EPA Division of Materials and Waste Management (DMWM) conducted a focused Compliance Inspection on January 4, 2013. This inspection was in response to an explosion and fire at Environmental Enterprises, Inc. (EEI). Jeff Smith, George Strobel, and I represented Ohio EPA. Gerald Nocks, Warren Taylor, and you represented EEI.

Ohio EPA conducted the inspection at EEI to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC), Chapter 3745 of the Ohio Administrative Code and EEI's Ohio hazardous waste facility installation and operation permit issued September 30, 2009. Our inspection consisted of a visual inspection of the areas involved in the incident, a partial review of written documentation and information EEI representatives provided in response to our questions.

EEI stated that on December 28, 2012, an EEI employee used a reciprocating saw to cut open metal casings on waste air pollution control filters containing sodium chlorate (D001) received from AVOX Systems Inc, (AVOX) Lancaster, New York. The use of the saw on the filter casing created a spark. The spark ignited the filter causing an explosion and fire which ignited seven (7) additional filters in close proximity. The explosion and fire injured two (2) employees, one (1) fatally. The procedure used for opening the filters was approved by the shift supervisor which, according to EEI, was not commonly done on prior shipments. In addition, EEI did not have a written procedure for this operation.

On January 10, 2013, Ohio EPA received employee training records requested during the inspection along with a copy of the incident report submitted to Ohio EPA's Director.

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Environmental Enterprises, Inc.
Notice of Violation – Permitted Treatment and Storage Facility OHD083377010
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Based on the inspection and documentation provided, Ohio EPA-DMWM has determined that EEI has violated the following state hazardous waste regulations and conditions of its Ohio hazardous waste facility installation and operation permit. All violations of EEI's permit are violations of ORC 3734.11(B).

1. **Duty to Comply, Condition A.5 and OAC Rule 3745-50-58(A)** The Permittee must comply with all applicable provisions of ORC Chapter 3734, all applicable Ohio hazardous waste rules, and all terms and conditions of this permit, except to the extent and for the duration that the laws of the state of Ohio authorize such noncompliance. Any permit noncompliance, other than noncompliance authorized by the laws of the State of Ohio, constitutes a violation of ORC Chapter 3734 and is grounds for enforcement action, revocation, modification, denial of a permit renewal application or other appropriate action.

EEI failed to comply with Condition A.5 and OAC Rule 3745-50-58(A) by not complying with all terms and conditions of EEI's permit and by not complying with applicable Sections of EEI's Part B Permit Application.

2. **Duty to Mitigate, Condition A.8 and OAC Rule 3745-50-58(D)** The Permittee must take all reasonable steps to minimize releases to the environment and must carry out such measures as are reasonable to prevent significant adverse impact on human health or the environment resulting from noncompliance with the permit.

EEI failed to comply with Condition A.8 and OAC Rule 3745-50-58(D) when two (2) employees were injured, one (1) fatally, because a spark-proof tool was not used while working on ignitable (D001) waste.

3. **Proper Operation and Maintenance, Condition A.9 and OAC Rule 3745-50-58(E)** The Permittee must, at all times, properly operate and maintain the facility (and related appurtenances) to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance includes effective management practices, adequate funding, adequate operator staffing and training, and where appropriate, adequate laboratory and process controls, including appropriate quality assurance/quality control procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the terms and conditions of this permit.

EEI failed to comply with Condition A.9 and OAC Rule 3745-50-58(E) when the shift supervisor approved the use of a sparking tool on ignitable (D001) waste.

4. **Design and Operation of Facility, Condition B.1(a) and OAC Rule 3745-54-31** The Permittee must design, construct, maintain and operate the facility to



Environmental Enterprises, Inc.
Notice of Violation – Permitted Treatment and Storage Facility OHD083377010
February 8, 2013
Page 3

minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, ground water or surface waters which could threaten human health or the environment.

EEL failed to comply with Condition B.1(a) and OAC Rule 3745-54-31 when an employee did not use a spark proof tool on ignitable (D001) waste.

5. General Waste Analysis Plan, Condition B.3(b) and OAC Rule 375-54-13

The Permittee must follow the procedures described in the waste analysis plan found in Section C of the permit application and the terms and conditions of this permit.

The waste profile provided by EEL during the January 4, 2013 inspection did not match the waste information. Profile number X86194 was created for "PPE contaminated with sodium chlorate." The waste stream associated with the fire and explosion was filters containing sodium chlorate. As stated in EEL's permit application, "A separate profile is required for each waste stream."

EEL failed to comply with Condition B.3(b) and OAC Rule 3745-54-13 when it did not create a separate profile for the filters containing sodium chlorate.

6. General Requirements for Ignitable, Reactive, or Incompatible Wastes, Condition B.7(a) & (c) and OAC Rule 3745-54-17

(a) The Permittee must comply with the requirements of OAC Rule 3745-54-17 and must follow the procedures for handling ignitable, reactive and incompatible waste as set forth in Section D of the permit application. (c) The Permittee must provide, and require the use of, spark-proof tools during all operations involving the handling of all ignitable or reactive waste.

EEL failed to comply with Condition B.7(a) & (c) and OAC Rule 3745-54-17 when a shift supervisor did not provide and require the use of a spark proof tool on ignitable (D001) wastes.

7. Special Container Provisions for Ignitable Waste, Condition C.10(a) & (c) and OAC Rules 3745-54-17

(a) The Permittee must not store ignitable or reactive waste except in accordance with OAC Rules 3745-54-17 and 3745-55-76. (c) The Permittee must take precaution to prevent accidental ignition or reaction of ignitable or reactive waste and shall follow the storage procedures specified in Section F of the permit application.

EEL failed to comply with Condition C.10(a) & (c) and OAC Rule 3745-54-17(a) by approving and allowing an employee to use a non-spark proof tool on ignitable



Environmental Enterprises, Inc.
Notice of Violation – Permitted Treatment and Storage Facility OHD083377010
February 8, 2013
Page 4

(D001) wastes which caused an explosion and fire injuring two (2) employees, one (1) fatally.

EEL needs to immediately take the necessary measures to return to compliance with Ohio's hazardous waste laws. Within 14 days of receipt of this letter, EEL is required to provide documentation to this office including the steps taken to abate the violations cited above. Documentation of steps taken to return to compliance includes, but is not limited to, written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to pam.hull@epa.ohio.gov and jeff.smith@epa.ohio.gov.

Ohio EPA is requesting copies of the following information from EEL:

1. Copies of all manifests for shipments from AVOX.
2. Copies of all profiles and ancillary information, along with the most recent annual updates for all AVOX waste streams.
3. Provide a written description of the complete treatment process for the filters, including disposal of filter media, metal casing, and sodium chlorate water.
4. Provide the job title and written description of each position, and written description of the type and amount of training required for each of the following: Brian Alexander; Kyle Duffens; Timothy Fisher; and Zach Henzerling.
5. Provide a complete written description of the training provided on August 2, 2012, titled "General Awareness, Contingency Plan, HAZ COM, BBP." This may include, but is not limited to, slides, handouts, and outlines.
6. List of all employees involved in the completion and approval of profile X86194 and copies of those employees' training records.
7. List of all QA Technicians involved in completing the waste receipt worksheets used during waste acceptance of shipments from AVOX and copies of those employees' training records.
8. Copies of all waste receipt worksheet records and QA data recorded for all incoming shipments from AVOX.

Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734. of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the



Environmental Enterprises, Inc.
Notice of Violation – Permitted Treatment and Storage Facility OHD083377010
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Page 5

abatement of violations, EEI is requested to submit written correspondence of the steps that will be taken to attain compliance.

The investigation into the December 28, 2012 incident at EEI is ongoing. Ohio EPA will continue to review all pertinent information to determine EEI's compliance with all state hazardous waste regulations and conditions of its Ohio hazardous waste facility installation and operation permit. Due to the nature and extent of the violations, we will be referring EEI to the Division of Materials and Waste Management's Central Office for consideration of escalated enforcement.

Failure to list specific deficiencies in this communication does not relieve EEI from the responsibility of complying with all applicable hazardous waste regulations. This letter does not relieve EEI from liability for any past or present violations of Ohio's hazardous waste laws.

Sincerely,

A handwritten signature in black ink that reads "Pam Hull".

Pam Hull
District Representative
Division of Materials and Waste Management

PH/tb

ec: George Strobel, SWDO-DMWM
Jeff Smith, SWDO-DMWM
Robyn Winstead, SWDO-DMWM/SWDO Facility File



ENVIRONMENTAL ENTERPRISES INCORPORATED

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February 25, 2013

Ms Pam Hull
Division of Materials and Waste Management
Ohio EPA
SWDO
401 East 4th Street
Dayton, OH 45402

Dear Ms. Hull:

I am in receipt of your letter from February 8, 2013, relative to your focused Compliance Inspection of the accident that occurred at our facility on December 28, 2012. I have a number of comments, which are pertinent to the alleged violations mentioned in your letter, which need to be considered prior to determining their validity.

You are correct in your statement that Environmental Enterprises, Inc. (EEI) does not have a written procedure for opening containers in the facility due to the wide variety and nature of containers involved. I am not aware that specific opening or closing requirements for containers is found in EPA Regulations, Ohio Revised Code (ORC), Ohio Administrative Code (OAC), or US EPA Federal Regulations.

Comment 1, your duty to comply comment is accepted as written.

Comment 2, Duty to Mitigate, The permittee must make all reasonable steps to minimize the releases to the environment and must carry out such measures as are reasonable to prevent significant adverse impact on human health or the environment resulting from noncompliance with the permit.

Please be advised that EEI is committed in complying with every component of our Part B Permit and all other regulations pertaining to the operations of EEI's facility. (*Note: there were no releases to the environment; air, water or soil*). The sprinkler water used for mitigation of the fire was contained within the room and inside the facility. No discharge was made to the sewer district or off-site. There was no release of water and there was no release of hazardous materials outside the facility. There was no effect on the neighborhood and the damage was confined to the room where the accident occurred.



Printed on Recycled and Recyclable Paper





The Duty to Mitigate; Proper Operation and Maintenance; the Design and Operation of the Facility; and Provisions for Ignitable, Reactive or Incompatible Waste Statements involve speculation that a release occurred and that activities were not conducted to mitigate occurrences in the facility, or to prevent a fire, explosion or unplanned release. The procedures, construction and operations of the facility are in place, which served to mitigate the fire as well as minimize the effect on human health and the environment. These provisions were well thought out in advance and were in place prior to the occurrence of this accident and at a minimum consist of the following:

- The use of a profile system and Quality Assurance (QA) procedures to review all material received to verify consistency with the profile prior to acceptance of material.
- The inspection of each shipment is to determine compliance with the profile.
- The development and use of an on-site laboratory.
- The use of explosion relief panels in the room where this accident occurred, which vented when needed and reduced the pressure wave generated by the reaction of this material. They functioned as designed.
- The entire facility contains monitored sprinklers which activates a central station alarm to the Cincinnati Fire Department. They functioned as designed.
- The use of automatic closing fire doors, which activated during the incident, which isolated this area of the plant. They functioned as designed.
- The use of two D-sized CO₂ cylinders for fire suppression that were located in the room where the fire originated, these were available but not used due to the short duration of the fire of approximately 7-seconds.
- The use of regular ABC fire extinguishers in the room, which were available but not used due to the short duration of the fire.
- The installation and operation of a LEL continuous monitoring and alarm system, within 15-feet of the accident location, which was not activated, due to the lack of solvent vapors in the room.
- The use of air operated diaphragm pumps and equipment to minimize sources of ignition.
- Specific bonding, grounding, nitrogen blanketing, and compatibility testing procedures to prevent reactions are in place.
- The use of floor level ventilation in the area for removal of heavier than air vapors, which is activated by the LEL alarm system. This was not activated during the accident. This functioned as designed.
- The use of explosion proof wiring, lighting, motors and hydraulic drives to prevent ignition sources.
- The spill containment dikes retained all fire water preventing a release. This functioned as designed.
- The PPE worn by the employees was adequate for the anticipated hazard and consisted of; steel toe boots, aprons, safety glasses, dust masks, and gloves. This was the same PPE suggested on the MSDS for handling Sodium Chlorate.
- The use of the buddy system for safety purposes.
- The actions of the employees and plant supervisors to the accident were timely and appropriate.



- Eric Fisher exited during the fire from the adjacent shredder room overhead door and advised Kyle Duffens to call the fire department. Kyle was exiting from the treatment tank area to the back pad to investigate the problem. Eric immediately went back through the rear man door and called out for Zack to make a noise in the smoke filled room so he could find him. Zack called out and Eric then grabbed him and dragged him out the back door. He then told Kyle to open the alley gate and direct the ambulance to their location.
- Kyle then called other plant managers who arrived at the facility within 20-minutes.
- All necessary agency notifications were made after the concerns of the Cincinnati Fire Department were addressed, but within 2-hours. The only fire that remained after the initial 7-seconds was a small wood fire on the roof, which supported the explosion relief panel. The sprinkler heads were replaced and the sprinkler system was re-activated. The roof was covered later that day to prevent freezing.
- All the above actions were appropriate for the situation and reflected the employees, training and experience.
- The other safety and building features are too numerous to mention, but do include a full-time Health & Safety Manager, installed Parapet construction features and fire walls, lighting, fire lines, emergency response equipment, and supplies.
- EEI is one of the few facilities which have a supplied breathing air system and negative pressure rooms.
- There are many other safety considerations and processes that EEI uses that are not listed here.

Comment 5 The waste profile did not specify filters contaminated with Sodium Chlorate. Ohio EPA is correct that the profile did not specify filters containing Sodium Chlorate. It listed PPE containing Sodium Chlorate. The same chemical is present on both materials and the same treatment process applies. The PPE and filter media are both non-hazardous and do not by themselves require any treatment.

The function of a Waste Analysis Plan is to properly classify the materials for storage and treatment at the facility. Compliance with the Waste Analysis Plan was accomplished by the use of this profile, because the proper chemical which required treatment was identified. It was the Sodium Chlorate that required treatment not the underlying filters or PPE. The classification and type of treatment of the material was the same. The use of different non-hazardous components is not important and does not affect a change in treatment process.

Some variations are acceptable for materials received at the facility unless the type of waste changes to the point where a different treatment process is required. Sometimes the variation is beyond accepted limits and an off-specification report is required. If it is within the general parameters of the profile, as this was, a separate profile is not needed. This profile indicated a strong oxidizer, which did not address this shipments reactive properties.



Comments 2, 3, 4, 6, and 7, relate to the use of a spark proof tool to be used while working with ignitable waste.

EPA's statement implied that the reaction was caused by a spark from a reciprocating saw because the material was flammable or ignitable is not accurate. Sodium Chlorate by itself cannot be ignited nor will it burn. The cause of this problem was the capture of Sodium Chlorate on cellulosic filter media, which is organic and potentially explosive by itself. This reaction did not result from EEI's combination of incompatible materials. The material contained the incompatibility when shipped.

The MSDS for Sodium Chlorate, a copy of which is attached, indicates that this material is stable and non-flammable. The D001 waste code is based upon its oxidation properties and not its flammability.

We believe that the Avox Corporation, on the shipment that reacted, used cellulosic materials in the filters creating an incompatible mixture, which was ignited by a spark or friction. On other shipments, Avox used plastic filters, which were not reactive with Sodium Chlorate. The ignitability of this material only occurs if the material is spread out on cellulosic or organic filter media. Otherwise, it cannot be ignited, even with a blow torch. EEI conducted an experiment which confirmed this.

All MSDS forms for Sodium Chlorate warn against combination with incompatible organic materials. They also state that Sodium Chlorate is a stable non-flammable material. Most MSDS's do not warn about the reactivity of Sodium Chlorate with paper.

Avox's profile did not mention the type of material that the Sodium Chlorate was on. The use of a paper filter creates an explosive incompatible waste stream. The use of a polymeric plastic filter does not. Both filters and PPE can be composed of either material with similar appearance and properties.

Avox Corporation classified this material on the shipping document as:

Waste Oxidizing Solid, Toxic, N.O.S.,
(Sodium Chlorate) 5.1 (6.1) PGII D001, D005

However, this is not accurate based upon the reactive nature of the shipment.

The proper D.O.T. shipping description should have read:

RQ, UN3097, Waste Flammable Solid, Oxidizing, N.O.S.,
(Sodium Chlorate on Cellulosic Fiber Filters), 4.1, (5.1) PGII D001, D005

As background information I have enclosed the D.O.T. Classification procedures we used for arriving at the proper shipping description for the Avox material.



In our opinion, Avox Corporation did not accurately describe the properties of the material on the profile or properly classify it according to US DOT as required by the certification statement of the manifest.

One other possibility is that the waste stream could have contained components that are explosive by themselves. Sodium Chlorate is not explosive by itself.

The assumption of the Ohio EPA that the use of a sparking tool caused this problem is not correct. The characteristics of this particular shipment, was the result of the incompatibility of the Sodium Chlorate on a cellulosic type material. This combination is what caused this accident. If a beryllium saw blade was available and used with an air operated saw, the accident would still have occurred due to the incompatibility of the material and the heat generated by friction. The fire and explosion were due to the incompatibility of the waste received and not the saw blade.

Attached, please find copies of the requested information. If you have any questions on the enclosed, please contact us at your convenience. We respectfully request to meet with SWDO so we may assist EPA in their decision making process through a more detailed discussion of the unfortunate accident.

Sincerely,
ENVIRONMENTAL ENTERPRISES, INC.

A handwritten signature in black ink, appearing to read "Daniel J. McCabe".

Daniel J. McCabe, P.E.
President

Enclosures

Cc: Jeff Smith
George Strobel



January 15, 2013

RE: Environmental Enterprises Inc.
Permitted Treatment and Storage Facility
OHD083377010
Hamilton County

Mr. Daniel McCabe
Environmental Enterprises Inc.
11603 Cincinnati-Dayton Road
Cincinnati, Ohio 45241

Dear Mr. McCabe:

Ohio EPA inspected Environmental Enterprises Inc.'s facility located at 4650 Spring Grove Ave. in Cincinnati on September 27, 2012. Ohio EPA was represented by me, Jeff Smith and George Strobel. You, Gerald Nocks and Warren Taylor represented Environmental Enterprises Inc. (EEI). Ohio EPA inspected EEI to determine its compliance with Ohio's hazardous laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code. My inspection consisted of a visual inspection of your hazardous waste treatment and storage areas and a review of written documentation. My review continued on November 16, 2012 when I received follow-up information from Warren Taylor regarding manifest discrepancies for waste shipped from EEI to Vickery Environmental during July 2012 through September 2012 that I discussed with you during the September 27, 2012 inspection. The letter identified how EEI has modified procedures to reduce the number of discrepancies caused by inaccurate quantities and DOT descriptions pertaining to pH.

No violations of Ohio's hazardous waste laws were found during this inspection. Enclosed you will find a copy of the checklists that I completed during the inspection. **A separate letter will be sent to you regarding the explosion and fire that occurred in the caustic storage room on December 28, 2012.**

Southwest District Office • 401 East Fifth Street • Dayton, OH 45402-2911
www.epa.ohio.gov • (937) 285-6357 • (937) 285-6249 (fax)



Environmental Enterprises Inc.
Permitted Treatment and Storage Facility; OHD083377010
January 15, 2013
Page 2

If you have any questions, please feel free to call me at (937) 285-6091. You can find copies of the rules and other information on the division's web page at <http://epa.ohio.gov/dmwm/Home.aspx>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://epa.ohio.gov/ocapp/ComplianceAssistanceandPollutionPrevention.aspx>.

Sincerely,

A handwritten signature in black ink that reads "Pam Hull".

Pam Hull
District Representative
Division of Materials and Waste Management

PH/tb

Enclosures

ec: George Strobel, SWDO-DMWM
Robyn Winstead, SWDO-DMWM/SWDO Facility File
Facility File: Environmental Enterprises Inc., Permitted Treatment and Storage
Facility, OHD083377010, Hamilton County



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

June 8, 2012

Mr. Daniel McCabe
Environmental Enterprises Inc.
10163 Cincinnati-Dayton Road
Cincinnati, OH 45241

RE: Environmental Enterprises Inc.
Permitted Treatment and Storage Facility
OHD083377010
Hamilton County

Dear Mr. McCabe:

Jeff Smith and I inspected Environmental Enterprises Inc.'s facility located at 4650 Spring Grove Avenue in Cincinnati on May 7, 2012. You, Gerald Nocks and Warren Taylor represented Environmental Enterprises Inc. (EEI). Ohio EPA inspected EEI to determine compliance with Ohio's hazardous laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio administrative Code. Our inspection consisted of a visual inspection of your hazardous waste treatment and storage areas and a review of written documentation.

No violations of Ohio's hazardous waste laws were found during this inspection. Enclosed you will find a copy of the checklists that were completed during the inspection.

If you have any questions, please feel free to call me at (937) 285-6091. You can find copies of the rules and other information on the division's website at www.epa.ohio.gov/dmwm. Ohio EPA also has helpful information about pollution prevention at <http://www.epa.state.oh.us/ocapp>.

Sincerely,

Pam Hull
Environmental Specialist
Division of Materials and Waste Management

PH/tf

Enclosures

cc: George Strobel, SWDO-DMWM
Robyn Winstead, SWDO-DMWM/SWDO

cc: Facility File, Environmental Enterprises Inc., Permitted Treatment and Storage Facility, OHD083377010, Hamilton County

Southwest District Office
401 East Fifth Street
Dayton, OH 45402-2911

937 | 285 6357
937 | 285 6249 (fax)
www.epa.ohio.gov



**OHIO PART B PERMITTED FACILITY
RCRA INSPECTION CHECKLIST**

Facility: Environmental Enterprises, Inc. Ohio Permit: 05-31-0466
 Address: 4650 Spring Grove Avenue U.S. EPA ID: OHD 083377010
Cincinnati, Ohio 45232 Phone: 513-541-1823
 County: Hamilton
 Inspection (CEI) Date: 5/7/12 Time: 9:30
 Was advance notice of the inspection given? YES x (not for initial inspection) NO
 If so, how far in advance? _____

	<u>Name</u>	<u>Agency/Title</u>	<u>Phone (general)</u>
Inspectors:	<u>Pam Hull & Jeff Smith</u>	<u>Ohio EPA</u>	<u>937-285-6357</u>
Facility Reps:	<u>Dan McCabe, Gerry Nocks & Warren Taylor</u>		<u>513-541-1823</u>

 Is facility operating as a generator? x YES NO

If so, complete the applicable sections of the Generator Requirements checklist for wastes being managed under generator status.

PERMIT STATUS

Permit Issued: <u>September 30 2009</u>	LDR Checklist Attached:	No*&**
Permit Effective Date: <u>September 30, 2009</u>	Used Oil Checklist Attached:	No*
Permit Expiration Date: <u>September 30, 2019</u>	Generator Checklist Attached:	No*&**
	Universal Waste Checklist Attached	No*

*Will fully assess compliance with these rules & fill these checklists out during next inspection (~ 6 months)
 **Did partially assess compliance of these activities partially in this checklist.

AUTHORIZED ACTIVITIES

STORAGE		TREATMENT		DISPOSAL	
<u>x</u>	Containers	<u>x</u>	Containers		Injection Well
<u>x</u>	Tanks	<u>x</u>	Tanks		Landfill
	Waste Pile		Thermal Treatment		Land Application
	Surface Impoundment		Post-Closure		Surface Impoundment

During 5/7/12 CEI, EEI was storing 91,620 gallons of hazardous waste (below 96, 275 gallons specified in their permit) in 3352 units.

The oldest drum was dated 5/11/11 (just inside the 1 year storage limitation).



From: Lauren Monahan [mailto:lmonahan@lexingtonky.gov]
Sent: Tuesday, May 03, 2016 5:16 PM
To: Tom McCabe
Subject: RE: HHW

Tom,

On behalf of our entire team here at Lexington-Fayette Urban County Government, I would like to take the opportunity to let you know what a pleasure it was to work with all of EET's knowledgeable staff to make our city's event more successful than we could have imagined!

From the beginning of the planning process to the event itself (as well as the close out procedures, grant reporting requirements, etc.), you and the staff worked to make everything run so very smoothly and efficiently. Your team made the project look effortless. The proper management of hazardous wastes collected as well as safety was top notch.

We have heard nothing but positive feedback from our residents about the event. What we have found residents most impressed with in particular has been the organization of the event as well as the kindness of all who worked that day.

Thanks again to you, Dan, Brian and the entire team that assisted in the execution of such a great collection event. I myself learned a lot and appreciate the guidance you provided along the way.

Kind regards, and we hope to have the opportunity to work with you again,

Lauren Monahan

Lauren Monahan
Environmental Outreach Specialist
Division of Waste Management



January 9, 2014

To Whom It May Concern:

I am writing to attest that Butler County Recycling & Solid Waste District has had a positive experience with Environmental Enterprises as its contracted agent for management of residential Household Hazardous Waste (HHW). In partnership with Environmental Enterprises, Butler County provides weekly residential HHW drop off service that has been "incident-free" for the past seven years. Environmental Enterprises has managed all aspects of service delivery for the Hazardous Waste Management program – from setting up collection stations, to providing customer greeting, data intake, and unloading customer materials, to sound management and final disposition of all materials and data collection.

The customer experience when discarding Hazardous Waste through the county's long term drop off program has been exemplary – Environmental Enterprises has provided the public with exceptionally efficient service, excellent professional public interaction, and a high level of accountability. We are pleased to provide testimony of the superlative experience we have had for managing residential household hazardous waste with the help of Environmental Enterprises Inc.

The oversight, accountability, and value that we have derived from our Hazardous Waste management experience with Environmental Enterprises has encouraged growth of the program, and ongoing public participation. The consumer experience has been positive and this ensures confidence in the county's service and safeguards public health for our community.

Feel free to contact me with any specific questions at (513) 887-3963.

BUTLER COUNTY RECYCLING & SOLID WASTE DISTRICT

Anne Fiehrer Flaig, District Coordinator



VANDEBURGH COUNTY
Solid Waste Management District

Room 327, Civic Center Complex
One N. W. Martin Luther King Jr. Boulevard
Evansville, IN 47708
(812) 436-7800
(812) 436-7801 fax
www.evansville.in.gov/recycle

Joseph D. Ballard
EXECUTIVE DIRECTOR

BOARD OF DIRECTORS

Joe Kiefer, Chair
Mayor Lloyd Winnecke
Marsha Abell
Stephen Melcher
Angela Koehler Lindsey
Conor O'Daniel
Bob Stobbs

Environmental Enterprises, Incorporated (EEI) has been the household hazardous waste collection contractor in Vanderburgh County, Indiana for 17 out of the last 18 years. During that time, EEI has conducted our collection program efficiently, effectively, with great service and at a reasonable price.

There were times that we had over 2000 vehicles in 6 hours and rarely did we have a backlog of cars. EEI merely added another lane for collection and unloaded the additional cars with ease. They are efficient in their setup for the program, in their conduct of the day's program, and in their cleanup of the materials and of the site. We have a very busy tox-away day and EEI handles it very well.

For these reasons I would not contract with another company to do our tox-away day or household hazardous waste collection day. EEI has handled our program professionally and has been a pleasure to work with.

Sincerely,

Joseph D. Ballard, Executive Director
Vanderburgh County Solid Waste District



Boone County Public Works Department

5645 Idlewild Rd.
Burlington, KY 41005
Phone: (859) 334-3600
Fax: (859) 334-3598
www.boonecountky.org

Gary W. Moore
County Judge-Executive

Jeff Earlywine
County Administrator

PE, PLS County Engineer
Scott Pennington

December, 16, 2013

Mr. Brian DePeel
Director, Environmental Enterprises, Inc.
4650 Spring Grove Avenue
Cincinnati, Ohio 45232
[Letter of Recommendation](#)

To Whom it May Concern:

I, Kelly Chapman, Supervisor of the Solid Waste Division in Boone County and Solid Waste Coordinator for the NKSWMA (Northern Kentucky Solid Waste Management Area) highly recommend Environmental Enterprises, INC (EEI) for all of your Household Hazardous Waste disposal.

The NKSWMA has hired EEI for the last 5 Household Hazardous Waste Cleanups in Northern Kentucky. With EEI's help, running a HHW Event is a breeze. The EEI's staff shows up at the event, sets up, works the event and then cleans up their stuff. I have to do nothing with the Hazardous Waste that we collect. Using EEI as our HHW vendor makes me feel secure and confident that they can handle any crazy HHW waste that is delivered from the Northern Kentucky residents.

If you have any questions please call me at 859-334-3629, I will be happy to give more details of the events.

Sincerely,

Kelly L. Chapman
Boone County Solid Waste Supervisor
NKSWMA Coordinator
859-334-3629



BOYLE COUNTY GOVERNMENT SERVICES CENTER
1862 SOUTH DANVILLE BY-PASS
DANVILLE, KENTUCKY 40422
859-238-1116

December 16, 2013

Mr. Brian DePeel
4650 Spring Grove Avenue
Cincinnati, Ohio 45241

Dear Brian:

On behalf of the Boyle County Department of Solid Waste Management, I would like to take this opportunity to thank you for the outstanding job on our Household Hazardous Waste Collection event. Twice in the last three (3) years you and your staff have provided a safe, secure and professional collection event for our residents. The operational and organizational skills in tandem with your openness of community needs and the flexibility needed for these events has given way to a partnership I am truly grateful for and that, in turn, the community has benefited from. I am very please to recommend EEI to any community looking for a well-qualified Household Hazardous Waste Contractor.

Thank you again and I look forward to working with you in the future.

Sincerely,

A handwritten signature in dark ink that reads 'Donna Fechter'. The signature is fluid and cursive, with a long horizontal line extending from the end.

Donna Fechter, Director
Boyle County Department of Solid Waste Management



December 16, 2013

Mr. Brian DePeel
Environmental Enterprises, Inc.
4650 Spring Grove Avenue
Cincinnati, Ohio 45232

To whom it may concern:

I am writing to express support of Environmental Enterprises Inc. as our contractor for Medina County's Household Hazardous Waste (HHW) program. EEI competitively bid to provide services to Medina County residents for the past 3 years.

Environmental Enterprises have played a big roll in our HHW program for the last three years, both to our residents and our employees. They have come in quietly and set up the night before at two (2) sites and they take charge on the day of our HHW program. They stay in communication with Medina County on several subjects like, the tally of vehicles, residents concern or problems and making sure Medina County needs are met. Their staff is very knowledgeable on managing the materials and they work hard to get our residents on their way in a timely manner.

EEI has the knowledge to manage the hazardous materials, maintain safety at all times and they have the professional and courteous attitudes that residents have come to expect.

If you have any questions please contact me.

--

Deborah Haumesser
Solid Waste Facility Manager
8700 Lake Road
Seville, Ohio 44273
330.769.1273 ext 1101
330.416.2685 c
330.769.4087 f



12/16/2013



*Ottawa • Sandusky
Seneca County*



**JOINT
SOLID WASTE
MANAGEMENT
DISTRICT**

December 16, 2013

Letter of Recommendation

TIM WASSERMAN
Director

tw@recycleoss.org

AMY DRUMMER
Assistant Director

ad@recycleoss.org

JIM DARR
Recycling Specialist

jdarr@recycleoss.org

JAMIE COLEMAN
*Community Outreach
Specialist*

jcoleman@recycleoss.org

BOARD OF DIRECTORS
*The County
Commissioners of
Ottawa, Sandusky &
Seneca Counties*

To Whom It May Concern:

The Ottawa Sandusky Seneca Joint Solid Waste Management District has been working with Environmental Enterprises, Inc. since 2008. Over those 6 years, they have serviced 36 collections. We are a multi-county district and, therefore, run simultaneous three-hour Saturday collections in each of our three counties. The logistical challenges have been handled very well by EEI.

Pre-event site inspection and preparation is thorough and communication with Mr. DePeel and the entire staff is smooth and uncomplicated. Material pricing is straightforward and has remained fair and consistent throughout the relationship.

If you are considering the services of EEI, please do not hesitate to contact me. I will gladly elaborate on the positive experience.

Sincerely,

Jim Darr
Recycling Specialist

1875 E. STATE STREET
FREMONT, OH 43420
PH: 419.334.7222
1.888.850.7224
FAX: 419.334.8626
Website: www.recycleoss.org

Printed on Recycled Paper



December 19, 2013

Environmental Enterprises, Inc.
Attn. Mr. Brian DePeel, Director
Lab Pack Services Division
10163 Cincinnati-Dayton Road
Cincinnati, OH 45241

RE: Letter of Recommendation

To whom it may concern:

I'm writing this letter of recommendation on behalf of the PA Resources Council, Pennsylvania's oldest grassroots environmental organization. Our organization has been offering residents of western PA the means to safely, economically, and responsibly dispose of household chemicals (also known as household hazardous waste – HHW) since 2003.

We have been utilizing the expertise and services of Environmental Enterprises, Inc. (EEI) from 2006 till present. EEI has acted as our contractor at forty-seven collections throughout western PA. Our collections typically attract anywhere from 300 to 1,300 participants (one-day events) demonstrating the range and versatility of the company. We have come to trust EEI and its business model. They have always delivered first-class service at a fair price. In addition, if a problem does arise EEI will gladly discuss and address any issues in a timely manner.

Please visit our website www.zerowastepgh.org for our program information. Also feel free to contact me directly at (412) 488-7490 x213 with any questions or if you require additional information.

Sincerely,

Michael Stepaniak
PA Resources Council
Environmental Programs Coordinator

PRC Western Regional Office, 64 S. 14th Street, Pittsburgh, PA 15203
Phone 412-488-7490, www.prc.org



11060 Kenwood Road
Cincinnati, Ohio 45242 U.S.A.
513.793.6256 · 513.793.6258 Fax
www.m25m.org

Rev. Wendell E. Mettrey
President and Founder

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Glenn Grismere

Don Heithaus

David Krust

Jim Russell

Michael Staudinger, M.D.

Harry Yeaggy

April 19, 2012

Dan McCabe
Environmental Enterprises, Inc.
10163 Cincinnati-Dayton Rd.
Cincinnati, OH 45241

Hi Dan.

On behalf of Matthew 25: Ministries, I would like to congratulate you on your selection as one of Matthew 25: Ministries' Green Giving Corporations. As a Green Giving Corporation, you meet the requirements established by Matthew 25: Ministries for exceptional corporate environmental stewardship.

Matthew 25: Ministries has developed the Green Giving Guidelines as a way of acknowledging product donors like you for your exceptional level of corporate responsibility. In the enclosed packet, you will find information on the program, electronic versions of the seal, a display certificate, and a license agreement. Please sign and return this agreement via fax, mail or email by May 31, 2012.

If you wish to put out a press release regarding your selection as a Green Giving Corporation, you will find an approved template on the enclosed disk. If you wish to alter this text in any way, please submit it to Matthew 25: Ministries' Public Relations Director, Joodi Archer, for approval first at joodi@m25m.org.

The Green Giving Guidelines are designed to promote corporate environmental responsibility, values and attitudes; to acknowledge participating corporations' willingness to act responsibly and to celebrate the enormous impact their actions have on the environment and people in need.

Again, on behalf of Matthew 25: Ministries, I'd like to congratulate you on your selection for this award and applaud your outstanding commitment to the environment and to the poor of our community, our country and our world.

Sincerely,

Bill Wojcik

"Caring for a needy world with the things we throw away."



Matthew 25: Ministries recognizes

Environmental Enterprises, Inc.

as a certified

2012 Green Giving Partner



based on the company's commitment to environmental responsibility by reducing corporate waste and repurposing excess product for humanitarian work.

Wendell Mettey

Rev. Wendell Mettey, Founder & President



**Washington County
Planning Commission**

100 West Beau Street, Suite 701
Washington, PA 15301-4470

Phone: 724-228-6811
Fax: 724-250-4110

County Commissioners:

Larry Maggi
Chairman

Diana Irey Vaughan
Vice-Chairman

Harlan G. Shoher, Jr.

Executive Director
Lisa L. Cessna

Board Members

Leslie P. Midk

Charles A. Crouse

Thomas Jennings

R. Christopher Wheat, P.E.

W. Ernest Watson

David B. Miller

Richard Burig

July 25, 2012

Environmental Enterprises, Inc.
4650 Spring Grove Avenue
Cincinnati, OH 45232
ATTN: Brian DePeel

Dear Mr. DePeel:

On behalf of the Washington County Board of Commissioners, I would like to extend my sincere gratitude for helping to make the 2012 Washington County Household Hazardous Waste Collection a huge success. Hopefully, with your help, the event will be one that the County can provide for its citizens and the region for years to come.

Please find a Certificate of Appreciation for your efforts enclosed. Again, thank you for your help and support.

Sincerely,

Jason E. Theakston
Land Use Planner

xc: File
Enclosure







Daniel J. McCabe, P.E.
President, CEO

Education / Training:

Masters of Science in Civil and Environmental Engineering;
University of Cincinnati, Cincinnati, Ohio, 1972

Bachelor of Science in Chemistry; University of Cincinnati,
Cincinnati, Ohio 1971

Graduate Studies in Business Administration; Wright State
University

Management Seminars; Dale Carnegie, 1988

- ◆ OSHA 40-Hour HAZWOPER Training
- ◆ OSHA 8-hour HAZWOPER Refresher Training
- ◆ Registered Professional Engineer in the States of Ohio,
Indiana and Kentucky
- ◆ Wastewater Treatment Plant Class III Operator's License
in the States of Ohio, Indiana and Kentucky

Summary:

Mr. McCabe is President and founder of Environmental Enterprises, Inc. (EEI). As a registered professional engineer, Mr. McCabe has been instrumental in the development of innovative and effective technologies for the treatment and disposal of hazardous and non-hazardous materials.

Since its inception in 1976, Mr. McCabe has developed EEI into the fourth largest consulting firm in the Tri-state area. In addition, he has developed effective remediation and response techniques that have allowed EEI to be involved with numerous emergency response contracts and industrial response activities.

Employment History:

1976-Present

Founder, President and CEO, Environmental Enterprises, Inc., Cincinnati, OH.

1972-1976

Systech, Consulting Engineering Group, Dayton, OH.

1969-1972

USEPA

**HHW CONTRACT SKILLS AND
EXPERIENCE**

- ◆ Over 36 years' experience in the environmental industry.
- ◆ > 100 Collection Events
- ◆ 36 years' experience performing technical evaluations of industrial wastewater problems.
- ◆ 33 years' experience in design of physical, chemical and biological treatment plants.
- ◆ 30 years as a consultant for on-site remediation activities, hazardous waste disposal, industrial waste treatment techniques and permitting issues.
- ◆ 28 years of experience in developing SPCC programs for local manufacturing firms.



Brian J. DePeel
Program Manager

Education / Training:

B.A., Music Education and Music Performance; University of Michigan, 1979

- ◆ OSHA 40-Hour HAZWOPER Training
- ◆ OSHA 8-hour HAZWOPER Refresher Training
- ◆ DOT Hazardous Material Handling & Shipping
- ◆ Blood Borne Pathogens
- ◆ Contingency Plan
- ◆ Fall Protection – 29CFR 1926, Subpart M
- ◆ Hearing Conservation
- ◆ Confined Space Entry Overview
- ◆ Medical Surveillance Program
- ◆ Lead Standard Training
- ◆ Hazardous Communications Standard
- ◆ Respiratory Protection
- ◆ Personal Protective Equipment
- ◆ Powered Industrial Trucks
- ◆ Control of Hazardous Energy for Affected Employees
- ◆ Respiratory Fit Testing

**HHW CONTRACT SKILLS AND
EXPERIENCE**

- ◆ > 100 Collection Events
- ◆ 19 years' experience in segregation, transportation, packaging and manifesting hazardous waste.
- ◆ Project Management
- ◆ Customer Relations
- ◆ Business Development

Summary:

Joined Environmental Enterprises, Inc. (EEI) in April of 1989. Was the first original outside employee hired for a newly created, division in 1989. Placed on the road as a field technician performing Lab Packs and various universities, colleges and hospitals. After short stops as Project Coordinator and Assistant Director, Mr. DePeel was promoted to his current position as Director of the Lab Pack Services Division in August of 1998.

Employment History:

August 1998-Present

Director, Lab Pack Services Division, Environmental Enterprises, Inc., Cincinnati, OH

As Division Manager, is ultimately responsible for the coordination and implementation for all Lab Pack operations for off-site packaging of materials throughout the United States. In addition, responsibilities include project management and oversight, sales, customer service and business development.

May 1995-August 1998

Assistant Director, Lab Pack Services Division, Environmental Enterprises, Inc., Cincinnati, OH

April 1989-May 1995

Project Coordinator, Lab Pack Services Division, Environmental Enterprises, Inc., Cincinnati, OH





Gary Davis

Health & Safety Manager

Education / Training:

B.S. Chemistry; University of Cincinnati, Cincinnati, OH

- ◆ OSHA 40-Hour HAZWOPER Training
- ◆ OSHA 8-hour HAZWOPER Refresher Training
- ◆ DOT Hazardous Material Handling & Shipping
- ◆ Blood Borne Pathogens
- ◆ Fall Protection – 29CFR 1926, Subpart M
- ◆ Hearing Conservation
- ◆ Confined Space Entry Overview
- ◆ Medical Surveillance Program
- ◆ Lead Standard Training
- ◆ Hazardous Communications Standard
- ◆ Respiratory Protection
- ◆ Personal Protective Equipment
- ◆ Powered Industrial Trucks
- ◆ Control of Hazardous Energy for Affected Employees
- ◆ Respirator Fit Testing

HHW CONTRACT SKILLS AND EXPERIENCE

- ◆ 31 years' experience in segregation, transportation, packaging and manifesting hazardous waste
- ◆ Project Management
- ◆ Customer Relations
- ◆ Business Development
- ◆ >100 Collection Events

Summary:

Joined Environmental Enterprises, Inc. (EEI) in 1980 as an Operations Manager and advanced to Senior Executive Vice-President in 1983. His experiences encompass Business Administration, Waste Management and Regulatory Compliance. Throughout his career, he has developed extensive knowledge of industry practices and procedures along with regulatory requirements.

Employment History:

2013 - Present

Health & Safety Manager, *Environmental Enterprises, Inc.*, Cincinnati, OH

2005 - 2013

Plant Operations Manager, *Environmental Enterprises, Inc.*, Cincinnati, OH

2001 - 2005

Operations Manager, *Care Environmental*, Valdosta, GA

1983 - 2001

Senior Executive Vice-President, *Environmental Enterprises, Inc.*, Cincinnati, OH

1980 - 1983

Operations Manager, *Environmental Enterprises, Inc.*, Cincinnati, OH





Gerry Ioannides
Corporate Director/Site Manager

Education / Training:

- MPA; Duke University, North Carolina, 1995
M.S.; Ohio State University, Ohio 1975
B.S.; Ohio State University, Ohio 1970
- ◆ OSHA 40-Hour HAZWOPER Training
 - ◆ OSHA 8-hour HAZWOPER Refresher Training
 - ◆ DOT Hazardous Material Handling & Shipping
 - ◆ Hazardous Communications Standard
 - ◆ Control of Hazardous Energy for Affected Employees

Summary:

Corporate Director for ten years, Mr. Ioannides is also the site manager of the Columbus office and collection center. He was the former Laboratory Chief for the Ohio Environmental Protection Agency. His duties included managing the State of Ohio's Primary Laboratory providing data to support activities within the Ohio EPA as well as the Ohio Attorney General's Office, Ohio Department of Health, Department of Agriculture, US EPA and the US Justice Department.

Mr. Ioannides has served as Ohio Governor's Representative on the National Laboratory Accreditation Committee in Washington, D.C. and assisted the Soviet Union in complying with environmental regulations to satisfy European Union Requirements.





Brad Boyer
CHMM, Field Service Manager/CDL Driver

Education / Training:

B.S. Hazardous Materials Management; University of Findlay, 1991

- ◆ OSHA 40-Hour HAZWOPER Training
- ◆ OSHA 8-hour HAZWOPER Refresher Training
- ◆ Radiation Safety Training
- ◆ DOT Regulatory Update HM-215-E Training
- ◆ DOT Security HM-232 Training
- ◆ Respiratory Fit Testing Training
- ◆ Formaldehyde Training
- ◆ Sulfide Monitor Training
- ◆ 1 of 4 Emergency Response Coordinators

Experience:

2006 - Present

Manager and Emergency Response Coordinator, *Environmental Enterprises, Field Service Division*, Cincinnati, OH

2004 - 2006

Manager of Oil Water Treatment Facility, *United Waste Water*, Cincinnati, OH

1996 - 2004

Contract Manager, CHMM, *Environmental Enterprises, Lab Pack Services Division*, Cincinnati, OH

1994 - 1996

Approval Chemist, *Environmental Enterprises, Plant Facility Division*, Cincinnati, OH

1992 - 1994

Sample Technologist II, *OHM Corporation*, Cincinnati, OH



Sheri Ruberg
Administrative Support

Education / Training:

Stenography; Colerain High School, Cincinnati, OH 1984

- ◆ Completed all classroom instruction required by EEI's training program
- ◆ Supervisory Level Drug Awareness Training
- ◆ 24-Hour OSHA Training
- ◆ Hazards Awareness Training
- ◆ HM232 Standards related to Homeland Security Program Training

**HHW CONTRACT SKILLS AND
EXPERIENCE**

- ◆ >100 Collection Events
- ◆ Segregation of Household Hazardous Waste
- ◆ Labeling and Manifesting HHW Waste
- ◆ Project Management

Summary:

A total of 29 years' experience with administrative duties including invoicing, bid and quote preparations, budget management, traffic coordinator, and 13 years' experience on Household Hazardous Waste Collections which include Segregation, Labeling & Manifesting.

Employment History:

August 2003-Present

Administrative Assistant, *Environmental Enterprises, Inc.*, Cincinnati, OH

Administrative duties include assisting Director and 5 key personnel, preparing bids and quotes, invoicing, switchboard operator, inventory control.

October 2002-August 2003

Server, *Skyline Chili*, Cincinnati, OH

January 1984-February 2002

Secretary/Traffic Coordinator/Sales/AP&AR, *Magnagraphics, Inc.*, Cincinnati, OH





Thomas McCabe Project Manager

Education / Training:

Industrial Management; University of Cincinnati, Cincinnati, OH
1972

- ◆ OSHA 40-Hour HAZWOPER Training
- ◆ OSHA 8-hour HAZWOPER Refresher Training
- ◆ Safe Operation of Powered Aerial Work Platforms
- ◆ Fall Protection – 29CFR 1926, Subpart M OSHA 1926.62
- ◆ Asbestos Awareness Training
- ◆ Confined Space Training
- ◆ Certified Heavy Equipment Operator Training
- ◆ Powered Industrial Trucks Training
- ◆ Control of Hazardous Energy for Affected Employees
- ◆ Portable Fire Extinguisher Training
- ◆ DOT Hazardous Materials General Awareness & Familiarization & Safety Training
- ◆ DOT Update & Security Training
- ◆ Supervisors Role in Administering Drug-Free Workplace Training

HHW CONTRACT SKILLS AND EXPERIENCE

- ◆ 6 years' experience as non-hazardous waste division Supervisor
- ◆ Over 5 years' experience as Household Hazardous Waste Site Operations Coordinator
- ◆ >100 Collection Events
- ◆ Supervises the loading of transport vehicles for Mobile Collection Sites
- ◆ 2 year as Mercury Technician operating EEI's Mercury Retort Unit.

Summary:

As Annex Manager, was able to get all waste processed at the annex, effectively cleaning out all four floors within an 18 month period. The Annex is the hub for all HHW materials. All the HHW material gets delivered right to the Annex where it is then segregated and processed.

Responsibilities/Duties/Experience include:

- ◆ Operated Mercury Retort Unit
- ◆ Segregate, package, and manifest chemicals for transportation
- ◆ Supervise HHW projects
- ◆ Supervise day to day operations of annex materials and personnel

Employment History:

1999-Present

Annex Manager, Environmental Enterprises, Inc., Cincinnati, OH

In charge of daily operations for all facets of the annex and its personnel staff from unloading of shipped materials to loading of HHW mobile collection events. One of top Points of contact for Hamilton County HHW Collection program which is held each Tuesday through Saturday at the annex and EEI corporate offices.

1980-1999

Partner, Anderson Hills Paving, Cincinnati, OH

1970-1980

Safety Director, Coney Island Inc., Cincinnati, OH





Jeffery Tucker
Project Manager/Field Chemist

Education / Training:

Campbell County High School; Alexandria, KY 1989

- ◆ OSHA 40-Hour HAZWOPER Training
- ◆ OSHA 8-hour HAZWOPER Refresher Training
- ◆ Blood Borne Pathogens Training
- ◆ Contingency Plan Training
- ◆ Fall Protection – 29CFR 1926, Subpart M Training
- ◆ Hearing Conservation Training
- ◆ Confined Space Entry Overview Training
- ◆ Medical Surveillance Program Training
- ◆ Powered Industrial Trucks Training
- ◆ Respiratory Protection Training
- ◆ Personal Protective Equipment Training
- ◆ DOT Regulatory Update HM-215-E Training
- ◆ DOT Security HM-232 Training
- ◆ Respiratory Fit Testing Training
- ◆ Formaldehyde Training
- ◆ Sulfide Monitor Training
- ◆ Hazardous Communications Standard Training
- ◆ Lead Standard Training

Summary:

Assistant Director for four years and Lab Pack Technician for over 15 years. He has over 17 years' experience with hazardous waste and chemical knowledge. Worked in various departments at EEI including Quality Assurance, Fuel Blending, Chemical Fixation department along with neutralization and Chemical Reduction. Responsibilities/Duties/Experience include:

- ◆ Consulting with customers with chemical direction, description and pricing
- ◆ Stabilization of Potential Explosive Chemicals
- ◆ Segregate, package, and manifest chemicals for transportation
- ◆ Identify and test unknown chemicals
- ◆ Supervise lab pack and HHW projects

Employment History:

1990-Present

Assistant Director/Lab Pack Technician, Environmental Enterprises, Inc., Cincinnati, OH

Responsible for Profile Approvals, and organization and implementation of daily operations for EEI field personnel. Assists the director in planning and implementation of training and operational programs. Is divisional liaison between this group and the facility.

1989-1990

Processor, Kahn's/Hillshire Farms, Cincinnati, OH

1989

Warehouse, Blue Chip Mailing & Distributing, Cincinnati, OH

**HHW CONTRACT SKILLS AND
EXPERIENCE**

- ◆ Chemical Fixation
- ◆ Chemical Neutralization
- ◆ Chemical Reduction
- ◆ Quality Assurance
- ◆ Fuel Blending
- ◆ Segregate and Packaging of Chemicals on-site
- ◆ Identify Unknowns/Testing
- ◆ Profiling and Pricing
- ◆ Warehouse
- ◆ Consulting
- ◆ Stabilization of Potential Explosive Chemicals
- ◆ Manifesting for Transportation
- ◆ > 100 Collection Events

Spring 2017
Household Hazardous Waste Collection Proposal
Part II: Site Set-up

The event will take place at the LFUCG old landfill pad, located at 1631 Old Frankfort Pike, Lexington, KY. Cars will enter the site through Jimmie Campbell Drive and exit on Old Frankfort Pike. (Aerial photo of site is attached).

Please provide examples of set-up diagrams for events conducted by your company, especially those with a high volume of traffic that include four lanes. Diagrams should include the following areas: Vehicle Unloading, Material Identification and Separation, Material Bulking, Non-Regulated Waste Disposal, and Truck Loading. Please include plans for handling overflow of traffic and materials, including plans to add more lanes for unloading and plans to bring in materials from outside to accommodate excess wastes. Please attach a description of spill and fire prevention plans, an emergency response plan, and a detailed outline of any volunteer training program provided by the vendor. The protocols for testing for unknown substances and packaging/transporting lithium batteries should also be attached.

Please note that the site of the event is a landfill cap, with an asphalt pad cover. Tents cannot be staked and grounding rods cannot be used on the asphalt. Grounding rods can be driven off the pad. The pad and surrounding area will need to be maintained to be in the same condition that existed prior to the event.





Material Overflow

Resident vehicles which are overfilled or have materials that require special handling requirements are redirected from the traffic line to a specified pull-off area on the project site to be unloaded. This allows for a continuous flow of vehicles in line, while being able to service the needs of the individual residents that require longer and more definitive unloading time.

Traffic Overflow

EEL is ready to accept resident's vehicles 1 hour prior to the advertised start times of the collections. This eliminates starting the collection with a back-up. EEL will start with two lanes for the residents and expand to 4 as the situation dictates. Personnel are selected and given job assignments prior to the start of the collections so should or when this situation develops, an easy transition is enacted on for opening the final 2 preset lanes.

Additional Materials

In the unlikely event that a shortage of materials would be on-site during the collection, EEL has as a contingency, a trailer pre-loaded and maintained with Yard Boxes and drums. An early assessment of the situation is made by EEL's Site Coordinator and the trailer is immediately dispatched from the plant. EEL's facility is within an hour and 25 minutes of the site. The assessment is made early so that there would be no interruption of service or packaging during the event.



ON-SITE COST TRACKING METHOD

EEL's site/project manager will obtain hourly counts of full containers, and using a spreadsheet, will keep a running total of costs incurred by the district based on quoted rates and the number and types of wastes collected. This information will be provided to the county project manager for their review.

A tally sheet is used to prepare the manifest and provides a running total of the types of wastes collected, as they are loaded onto transport vehicles. This tally sheet will be used to obtain the data and costs described above. A copy of this sheet is enclosed for reference.

Generator				Manifest #		Trailer #
Quantity	Size	Physical State	B/LP	Profile #	Name of Material	Total Weight
		CY	LP	HHPROP	Propane 2.1	
		CY	LP	HHFX	Fire Extinguishers 2.2	
		CY	LP	HHHELIUM	Helium 2.2	
			LP	HHALUM	Paint, Aluminum	
	55	DM	B	HHBFL	Flam Liq (gas, kerosene) 3	
	55	DM	LP	HHFLLP	Flam Liq (paint, paint thinner) 3	
	55	DM	LP	HHPLIQ	Pest Liq (malathion, chlordene) 3	
	5	DF	LP	HHFSLP	Flam Solid (magnesium) 4.1	
	55	DM	LP	HHOXLPL	Oxidizing Liquid, 5.1	
	55	DM	LP	HHOXLPS	Oxidizing Solids, 5.1	
	5	DF	LP	HHOPER	Org Per. Type D (peroxide) 5.2	
	5	DF	LP	HH TICN	Trichloroisocyanuric Acid	
	5	DF	LP	HH LITR	NA1057, Lighters, 3, PGII ERG#115	
	5	DF	LP	HHNICD	Tox Sol Inor (NICD batteries) 6.1	
	Yard Box	CF	LP	HHPSOL	Pest Sol. (Sevin)	
	5	DF	LP	HH TXLP	Tox Sol Inor (lead, chrome) 6.1	
	55	DM	LP	HHACLP	Cor Liq Acid (sulfuric acid) 8	
	55	DM	LP	HHALLP	Cor Liq Basic (sodium hydroxide) 8	
	5	DF	LP	HHMERC	Mercury, 8	
	Yard Box	CF	B	HH Pbac	Batteries filled with acid, 8	
	55	DM	B	HHASB	Asbestos, 9	
	55	DM	B	HHBALL	PCB Solid, 9	
	5	DF	LP	HH LIBT	Lithium Batteries	
	5	DF	LP	HH SMOK	Non-reg (smoke detectors)	
	55	DM	B	HHANTI	Non-reg (antifreeze)	
	20	DF	LP	HHBATT	Non-reg (household batteries)	
	55	DM	LP	HHCLNR	Non-reg (household cleaners)	
	Yard Box	CF	B	HHFERT	Non-reg (fertilizer)	
	Skid/Box	CF	B	HHFLOR	Non-reg (fluorescent bulbs)	
	55	DM	LP	HHOFIL	Non-reg (oil filter)	
	55	DM	B	HHOIL	Non-reg (oil)	
	55	DM	LP	HHPUTY	Non-reg (putty & adhesives)	
	Yard Box	CF	B	HHPUTY	Non-reg (putty & adhesives)	
	YD/55	CF/DM	LP	HHAERO	Consumer Com. (aerosols)	
	55	DM	LP	HHPAER	Consumer Com. (pyrethrin)	
	Yard Box	CF	B	HHPNT	Consumer Com. (household paint)	
	5	DF	LP	HHISO	UN3080, Isocyanates, Toxic, Flam, n.o.s.; 6.1 (3), PGII	



Hazardous Household Waste Collection Event Spring 2017
Lexington-Fayette Urban County Government - RFP#2-2017

HHW Equipment List

Supervisor: _____
 Trailer Number: _____
 Number of Vehicles: _____

Job Location: _____
 Event Date: _____
 Collection Times: _____

Work Order No: _____
 Comp. By: DePeel
 Date: _____

MET ☐ Rented Trailer ☐ Date Rented: _____ Date Returned: _____

<u>Transportation</u>	<u>Req'd</u>	<u>Comp.</u>	<u>Trailer#</u>	<u>PPE</u>	<u>Req'd</u>	<u>Comp.</u>	<u>Trailer#</u>	<u>Site Preparation</u>	<u>Req'd</u>	<u>Comp.</u>	<u>Trailer#</u>
Tractor Trailer				Safety Glasses				Shrink Wrap			
Straight Trucks				Face Shields				Traffic Cones			
Roll-off Boxes				Yellow Tyveks (Case)				Plastic – 20 x 100			
Forklift Carrier				White Tyveks (Case)				Plastic – 40 x 100			
				Cloth Gloves				Plywood			
				Black Gloves (Pair)				Warning Signs			
Materials Handling				Latex Gloves (Boxes)				Shovels			
Fork Lifts				Dust Masks				Brooms			
Propane Tanks				Sweat Bands				Duct Tape			
Pallet Jack				Emer. Response				55 Gal Water Drums			
Skids BIG				Org Sorbent Pads (Bundle)				Bungs (Bucket)			
Carts				Inorg Sorbent Pads (Bndle)				Water Cooler			
Oil Totes				Oil Dry Bags				Hand Soap			
Drum Funnels				Fire Extinguishers				Paper Towels			
Gird. Rods/cables				First Aid Kits				Tool Box			
Bung Wrenches				Portable Eyewash				5 Gal Water Drum w/spicket			
Razor Knives											
Hazcat Kits											
				Marking & Labeling				Documents			
Packaging				Labeling Kits	Lpk			Manifests	Lab Pack		
Cubic Yard Kits				Grease Pens	Lpk			Bill of Lading	Lab Pack		
Bulk Steel Drums				Ink Pens	Lpk			Profiles	Lab Pack		
55g Steel Drums				Non-Haz Labels	Lpk			Work Orders	Lab Pack		
30 Gal. Drums				Non-Haz HCTs	--			Dir. To Job Site	Lab Pack		
20 Gal. Fibers				Packing Lists	--			Personnel List	Lab Pack		
5 Gal. Polys				Pkg. List Envelopes	--			Personnel Mobilization			
55g Poly Drums								No. of Personnel			
Light Bulb Boxes								EEL Personnel			
Vermiculite (Bags)								GI Personnel			
Roll-off Liners											
Recovery Drums											



OFF-SITE FACILITIES LIST

CEMENT KILN

ESSROC Cement Company (Fuels
Program Managed by C.P. Recycling)
3084 W. County Road 225 South
Logansport, IN 46947
EPA ID: IND 005081542
Phone (574) 753-2675
Contacts: Grant Meeks
Fax: (574) 753-7232

Lone Star Industries
2524 South Sprigg Street
Cape Girardeau, MO 63701
EPA ID: MOD 981127319
Phone: (573) 335-2083
Contact: Dave Jordan
Fax: (573) 335-8992

**Lone Star DBA Buzzi Unicem
Greencastle WDF Facility**
3301 South County Road
Greencastle, Indiana 46135
EPA ID: IND 006419212
Phone (765) 653-8816
Contacts: Tony Bannon
Fax: (765) 653-3556

ORGANIC SLUDGES & SOLIDS FOR FUEL BLENDING

Lone Star Industries
2524 South Sprigg Street
Cape Girardeau, MO 63701
EPA ID: MOD 981127319
Phone: (573) 335-2083
Contact: Dave Jordan
Fax: (573) 335-8992

Giant Resource Recovery-Sumter
755 Industrial Road
Sumter, SC 79151
EPA ID: SCD036275626
Phone: (803) 773-1400
Contact: James Harlan

DEEP WELL INJECTION FOR EEI TREATED WASTEWATERS

Vickery Environmental
3956 State Route 412
Vickery, OH 43464
EPA ID: OHD 020273819
Phone: (419) 547-7791
Contact: Carolyn Golamb
Fax: (419) 547-6144



INCINERATORS (Hazardous Waste)

Clean Harbors, Inc. (Formerly Teris)

309 American Circle
El Dorado, AR 71730
EPA ID: ARD 069748192
Phone: (870) 864-3663
Contact: Tina Estridge
Fax: (870) 864-3674

Veolia Environmental Services

Trade Waste Incineration
7 Mobile Avenue
Sauget, IL 62201
EPA ID: ILD 098642424
Phone: (618) 271-2804
Contact: Jan Gallee
Fax: (618) 271-9704

WTI (Von Roll)

1250 St. George Street
East Liverpool, OH 43920
EPA ID: OHD980613541
Phone: (330) 385-7336
Contact: Lorraine Davis
Fax: (330) 385-7813

INCINERATORS (PCB'S)

Veolia Environmental Services (formerly CWM – Port Arthur)

Hwy 73 (3.5 miles W. of Taylor's Bayou)
Port Arthur, TX 77640
EPA ID: TXD 000838896
Phone: (409) 736-2821
Contact: Rosa Landry
Fax: (409) 736-1636

Clean Harbors Deer Park, LP

2027 Battle Ground Road
Deer Park, TX 77536
EPA ID: TXD 000838896
Facility Phone: (281) 930-2300
Contact: Shelby Beilke
Contact Phone: (773) 646-6202
Fax: (773) 646-6280

LANDFILL - SANITARY

Rumpke

10975 Hughes Road
Cincinnati, OH 45251
EPA ID: N/A
Phone: (513) 851-0122
Contact: Greg Spurlock
Fax: (513) 825-4839

Rumpke (Pendleton County Landfill)

1374 Bryan Griffin Road
Butler, KY 41006
EPA ID: KY0000997957
Phone: (800) 367-8235
Contact: Brian Burgemeir
Fax: (859) 472-7021



LANDFILL – SANITARY (Cont.)

Bavarian Landfill

12764 McCoy Fork Road
Walton, KY 41094
EPA ID: N/A
Phone: (859) 485-4416
Contact: Rick Bruggemann
Fax: (859) 485-1406

Waste Management of Ohio

Stony Hollow RDF
2460 South Gettysburg Road
Dayton, Ohio 45118
EPA ID: N/A
Facility Phone: (937) 268-1133
Fax: (937) 268-1133
Contact: Rudy Ramey

LANDFILL (SECURE)

Wayne Disposal, Inc. (E.Q.)

49350 North I-94 Service Drive
Belleville, MI 48111
EPA ID: MID 048090633
Phone: (800) 592-5489
Contact: Melissa Rickabaugh
Fax: (800) 592-5329

Envirosafe Services of Ohio, Inc.

876 Otter Creek Road
Oregon, OH 436165
EPA ID: OHD 045243706
Facility Phone: (800) 537-0426
Contact: Dave Ridgnow
Fax: (419) 698-8663

LANDFILL (PCB)

Wayne Disposal, Inc. (E.Q.)

49350 North I-94 Service Drive
Belleville, MI 48111
EPA ID: MID 048090633
Phone: (800) 592-5489
Contact: Melissa Rickabaugh
Fax: (800) 592-5329

MERCURY & LIGHT BULB RECYCLERS

AERC Recycling Solutions, Inc.

2591 Mitchell Ave.
Allentown, PA 18103
EPA ID: PAD987376726
Phone: (800) 554-2372
Contact: Michelle Park
Fax: (610) 797-7696

Veolia Environmental Services

1275 Mineral Springs Drive
Port Washington, WI 53074
EPA ID:
Phone: (262) 243-8900
Contact:
Fax: (262) 284-3775



STABILIZATION

Michigan Disposal, Inc. (E.Q.)

49350 N. I-94 Service Drive
Belleville, MI 48111
EPA ID: MID 000724831
Phone: (800) 592-5489
Contact: Melissa Rickabaugh
Fax: (800) 592-5329

Envirite

2050 Central Avenue, SE
Canton, OH 44707
EPA ID: OHD 980568992
Phone: (330) 456-6238
Contact: Sam Pantuso
Fax: (330) 456-2801

Stablex of Canada, Inc.

760 Industrial Blvd.
Blainville (Quebec) J7C 3V4
EPA ID: NYD 980756415
Phone: (514) 430-9230
Contact: Natalie Mathieu
Fax: (514) 430-4642

EQ of Detroit

1923 Frederick Street
Detroit, MI 48211
EPA ID: MID980991566
Phone: (313) 923-0080
Contact: Katie Marie
Fax: (313) 923-3375

PCB TREATMENT

Clean Harbors

1672 E. Highland Road
Twinsburg, OH 44087
EPA ID: OHD 986975399
Facility Phone: (330) 425-3825
Contact: Shelby Beilke
Contact Phone: (773) 646-6202
Facility Fax: (330) 487-5784

Clean Harbors

1302 West 38th Street
Ashtabula, OH 44004
EPA ID: OHD 981093420
Facility Phone: (440) 992-8665
Contact: Shelby Beilke
Contact Phone: (773) 646-6202
Facility Fax: (440) 992-5784

WASTEWATERS (NON-D002)

Permafix of Dayton

300 Cherokee Drive
Dayton, OH 45247
EPA ID: 004274031
Phone: (937) 268-6501
Contact: Kim Black
Fax: (937) 268-5734



EMPTY DRUM RECYCLER

Queen City Barrel

1937 South Street
Cincinnati, OH 45204
EPA ID: OHD987016284
Phone: (513) 921-8811
Contact: Eddie Paul
Fax: (513) 921-3684

Dayton Industrial Drum

1880 Radio Road
Dayton, Ohio 45431
EPA ID: OHD057540114
Phone (800) 253-1997
Contact: Joe Brucken
Fax: (937) 253-8656

ANTIFREEZE RECYCLING

Consolidated Recycling

8 Commerce Drive
Troy, IN 47588
EPA ID: IND 098958283
Phone: (812) 547-7951
Contact: Jerry Brown
Fax: (812) 547-7954

Chesapeake Environmental Services

8464 Ardick Ardmore Road
Landover, VA 20785
EPA ID: NA
Phone: (888) 773-2784
Contact: John Stein

Ecofreeze

3280 Peachtree Corners Circle Suite A
Norcross, GA 30092
Phone: (770) 729-0880
Contact: Carl Ferrans
Fax: (770) 726-0906

E-WASTE RECYCLING

Enviro Electronics

30700 Center Road
Solon Ohio 44139
EPA ID: N/A
Phone: (216) 832-3081
Contact: Mike Frothingham
Fax:



LEAD ACID BATTERIES FOR RECYCLE

Quemetco

7870 W. Morris Street
Indianapolis, IN 46241
EPA ID: IND000646943
Facility Phone: (317) 243-6538
Contact Tom Kelly
Phone (800) 527-9452 ext 278
Fax: (214) 631-4013

Doe Run Co. Buick Resource & Recovery Facility

HCL Box 1395
Boss, MO 65440
EPA ID: MOD 059200089
Phone: (573) 626-4813
Contact: Elaine Bailey
Fax: (573) 626-3405

USED OIL RECYCLING

Enterprise Oil Company

5201 Middlebrook Pike P.O. Box 52044
Knoxville, TN 37950-2044
EPA ID N/A
Facility Phone: (800) 875-3860
Contact: Dave Chovanec
Contact Phone ☎(865) 588-1544
Fax: (865) 588-1544

Permafix of Dayton

300 Cherokee Drive
Dayton, OH 45427
EPA ID: OHD 004274031
Phone: (937) 268-6501
Contact: Kim Black
Fax: (937) 268-9059

CYLINDERS

Treatment One (Division of SET Environmental)

5738 Cheswood
Houston, TX 77087
EPA ID: TXD 055135388
Phone: (713) 645-8710
Contact: Shelia Armstrong or Sandy Moody
Fax: (713) 649-1027
Fax: (865) 588-1544

Customs Environmental Services

7722 9th Street NM
Edmonton, Alberta T6P1L6
EPA ID: N/A
Phone: (780) 440-1825 or (800) 661-5792
Contact: Gerry Gerke
Fax: (780) 440-2428



DIXOIN WASTE (EPA Waste Code F027)

Customs Environmental Services

7722 9th Street NM
Edmonton, Alberta T6P1L6
EPA ID: N/A
Phone: (780) 440-1825 or (800) 661-5792
Contact: Gerry Gerke
Fax: (780) 440-2428
Fax: (865) 588-1544

AEROSOL CANS

Customs Environmental Services

7722 9th Street NM
Edmonton, Alberta T6P1L6
EPA ID: N/A
Phone: (780) 440-1825 or (800) 661-5792
Contact: Gerry Gerke
Fax: (780) 440-2428

Rineco

1007 Vulcan Road P.O. Box 729
Benton, AR 72018
EPA ID: ARD981057870
Phone: (800) 377-4692
Contact: David Spea
Fax: (501) 778-8505

ALKALINE BATTERIES FOR LANDFILL

Envirosafe Services of Ohio, Inc.

876 Otter Creek Road
Oregon, OH 436165
EPA ID: OHD 045243706
Facility Phone: (800) 537-0426
Contact: Dave Ridgnour

NI CD and LITHIUM ION BATTERIES FOR LANDFILL

Stablex of Canada, Inc.

760 Industrial Blvd.
Blainville (Quebec) J7C 3V4
EPA ID: None
Facility Phone: (450) 430-9230
Facility Contact: Natalie Mathieu
Facility Fax: (450) 430-8200



ALKALINE, NI CD, and LITHIUM ION BATTERIES FOR RECYCLING

INMETCO

P.O. Box 720
245 Portersville Road
Ellwood City, PA. 16117
EPA ID: PAD 087561015
Facility Phone: (724) 758-2800
Facility Contact: Marty Clark
Facility Fax: (724) 758-2845
Sales Contact: Al Hardies
Sales Phone: (724) 758-2825

NON-HAZARDOUS WASTE TO ENERGY INCINERATION

COVANTA

2320 South Harding Street
Indianapolis, Indiana 46221
Facility Phone: (317) 634-7367
Sales Contact: Bernie Heille
Sales Phone: 317 299-8412



OPERATIONS PLAN

The execution and ultimate completion of a HHW Collection Event requires a Waste Management Plan. The plan begins with the acceptance of HHHW and ends with the recycling, processing and/or disposal of HHW in compliance with all Federal, State, City, and local rules and regulations.

There are six aspects of our **Waste Management Plan**:

A. Waste Determination. Our chemist and/or environmental scientist will inspect household waste and waste container labeling to determine the hazard classification of the material. If a particular material is acceptable (that is, if the material is confirmed to be household waste or waste excluded from regulations under 40CFR Part 260), the material will be accepted. If a particular material is unacceptable, the resident will be advised of safety precautions to follow for disposal of the material. See Section **"Unacceptables"** for wastes that will not be accepted.

EEl will review all materials for acceptability. EEl may choose to accept some unacceptable materials depending upon the material's condition, toxicity, and potential risks to health or environment. EEl can accept asbestos, medicines and smoke detectors for disposal.

B. Waste Identification. We will perform HAZ-CAT testing on unlabeled material from residents, which includes but is not limited to pH odor, flash, viscosity, color and physical characteristics. However, in some cases, unknown wastes may be accepted without analytical testing. Our field chemists and technicians draw from a wealth of knowledge and years of experience in the process of hazardous waste identification and classification.

C. Waste Segregation. Hazardous waste will be segregated according to the Department of Transportation hazard classifications. Additional segregation may be required, depending on the ultimate site criteria, if applicable or chemical compatibility. Segregated hazardous waste is classified, packaged, labeled and removed in accordance with our "Waste Packaging" procedures. The segregation process meets the requirements of 40CFR Part 260 and 261 and 49CFR Part 172.

D. Waste Packaging. All packaging of wastes will be performed to ensure strict compliance with Department of Transportation regulations for hazardous materials shipments. EEl utilizes containers that provide the maximum amount of volume at the most economical rate. EEl does not Bulk Paint On-site.

E. Waste Stream Management. EEl will adhere to the following waste management hierarchy to the greatest extent practical and permitted by law: recycling, reprocessing, fuel-blending, treatment, RCRA incineration, and RCRA landfilling. Incineration will take precedence over landfilling. EEl does not landfill anything without pre-treating it first and tries to landfill as little as possible. The objective of household waste programs is to remove hazardous materials from landfills and recycle or reuse it.

F. Waste Tracking. EEl has one of the most complete computer tracking systems in the industry for monitoring the disposal routes of hazardous materials. Our system of documentation is three phases: (1) confidential profile systems, (2) computer log, and (3) bar coding. Before waste is received at our facility, a Pre-numbered profile is submitted detailing information about the generator and generators waste stream. When materials are received at our facility, a unique





numbered barcode system tag is affixed to each container and entered into the computerized log. This tag identifies profile, generator, and manifest and gives area location for each container received and stays with its particular waste stream as it makes its way through our facility and treatment processes. Thirdly, all steps are tracked by our computer logging system. This enables us to monitor your materials from point of generation/shipment through treatment to final disposal. At any given point in time we are able to tell you the disposition of your materials.

Site set-up. EEI's site designs will be as such to accommodate large volumes of traffic and "walk-ins", with a maximum wait time of twenty minutes per vehicle. Operations will be conducted to ensure protection of the environment and the safety of all participants, and to ensure the timely removal of all collected materials following completion of each event.

Examples of Site Plans typical of EEI HHW Collections are enclosed. EEI tailors its plans to each site in order to achieve the following:

1. Adequate safety measures to protect personnel/participants
2. Protection of property and environment
3. Ease of operation
4. Maximum efficiency in materials management
5. Maintain traffic flow to avoid congestion and reduce unloading time
6. Compliance with all Federal, State, and Local rules and regulations.
7. Compliance with contract requirements

EEI will work with the District to prepare, revise and modify final plans, as conditions require.

Volunteers. Volunteers will be used for directing traffic and conducting surveys. EEI will hold a general safety meeting with all volunteers prior to the start of each event.

Staffing. Each Collection site will be managed by personnel with a minimum of four years' experience in Household Hazardous Waste. EEI will provide the appropriate number of personnel to staff each collection in these key areas as follows:

PROJECT MANAGER: Brian DePeel, Director
4650 Spring Grove Avenue
Cincinnati, Ohio 45232
(800) 850-3587 / (513) 853-3587
Fax: (513) 853-3597

Site Manager: Will coordinate all on-site activities including the testing of unknowns. Individual will also be responsible for site safety.

Regulatory Technologist/Chemist/DOT Specialist: Will ensure the proper segregation and compatibility of materials received. Will ensure compliance with U.S. DOT regulatory requirements for packaging, labeling, and manifesting of materials.

Technicians: Will assist in unloading and proper routing of vehicles and material. Consolidation of oils and antifreeze, packaging, and labeling of drums.

Drivers: Delivery and unloading of supplies and materials to each station. Loading of packaged wastes and miscellaneous labor as needed.

Laborers: Traffic control, resident verification, surveys, assist technicians unloading vehicles, trash management. All site workers will be employees of Environmental Enterprises, Inc. and at a minimum will have had awareness training on HHW and prior experience on HHW projects.



OPERATIONS. The following operations plan is typical of a comprehensive full turn-key Household Hazardous Waste Collection program performed by EEI. EEI works with each Solid Waste District to tailor operations and plans that meet the requirements specific to each project.

The performance of each HHW collection event will be conducted in the following stages:

1. Mobilization
2. Site Preparation
3. Collection
4. Labeling, Manifesting and Placarding
5. Site Clean-up/Demobilization

Mobilization. EEI typically mobilizes to the site on the Friday prior to the collection event. Mobilization will consist of delivery of materials and personnel using box trucks, tractor trailers, passenger vans and a few personal vehicles. Vehicles and roll off boxes for removal of trash will also be staged at each location, as required. Materials and equipment will include the following:

- DOT specification containers for packaging of materials
- Vermiculite for packaging
- Spill Kits (oil dry, shovels, brooms, etc.)
- Safety, first aid and emergency equipment
- Tents and related equipment
- Heavy gauge plastic to protect the collection/packaging areas
- Drum/container labeling kits
- Tables for materials collection/segregation
- Conveyors for movement of materials
- Portable toilets (if required)
- Traffic cones/markers
- Fork lifts

Site Preparation. EEI will coordinate with the District and site owners to ensure that arrival times do not interfere with normal operations of the owner's facility. EEI anticipates that site preparation will take approximately one and one-half hours. During this time, tents may be erected, heavy gauge plastic will be rolled out to cover the receiving and packaging areas for spill containment and cleanliness, and tables for receipt of materials will be set in place. Site set-up typically occurs the day before the collection event, but can be completed the morning of the event if a requirement of the owner.

Markers and signs will be placed for traffic flow and control. Drums and packaging materials will be staged in appropriate areas. Emergency equipment will be placed at proper locations.

The site area will be surveyed for the potential for, or presence of any environmental problems, such as open sewers or drains, runoff potential and previous spills. If any of these conditions exist, appropriate action will be taken.

Upon completion of site preparation, we will be ready to begin receipt of materials as scheduled. EEI will also make arrangements to provide site security where needed.



Collection Event. EEI will be prepared to perform this event in any type of weather. If needed, tents will be erected, storm drains will be covered, and rain gear will be available for all EEI personnel, all volunteers, and District representatives. EEI will work with as much speed and efficiency to keep collected materials, documents, etc. as dry as possible.

In order to accommodate a large number of vehicles and a goal of less than fifteen minutes wait per vehicle, EEI intends to run a minimum of two (2) traffic lanes at the site plus provide for expansion of this if necessary to four (4) lanes as contingency lanes should turnout of participants be larger than expected. Final plans will be tailored for the site to make vehicle unloading and material receipts as efficient as possible. EEI will consult with the District prior to the actual event to develop site set-ups that will be the most advantageous in regards to traffic flow, safety and ease of operation.

EEI will be ready to begin the events one hour prior to the advertised starting time to prevent the initial backlog of cars common to these events. EEI works with each district to coordinate predetermined times of readiness.

As vehicles approach the collection area, they will be diverted into multiple lines delineated by traffic cones or other suitable markers/barriers. EEI staff or volunteers will be present, if needed, to perform the following:

1. Verify resident eligibility
2. Conduct surveys, as required
3. Provide instructions to residents
4. Have trunks opened

Upon entering the collection area, arriving vehicles will be checked for type of material and unloaded by EEI personnel into the closest packaging area. EEI will have boxes or other suitable containers on hand to unload loose items from incoming vehicles.

Materials flow pattern will be:

1. Receipt
2. Proper segregation
3. Packaging
4. Container closure and labeling.
5. Loading into transport vehicles.

Unacceptables. The following materials are "unacceptable" and will be excluded from HHHW collection events:

- Explosives, gunpowder, ammunition
- Construction waste
- Radioactive Materials
- Compressed Gas Cylinders not identified on the price list or which are not approved for acceptance by the district.
- White Goods (including Freon containing appliances)
- Tires



Additionally, EEI will not accept infectious or pathogenic wastes, such as used needles and syringes in sharp containers unless requested by the district.

Should any of these materials be brought to the collection sites, residents will be informed immediately as to:

- Hazardous characteristics associated with the waste
- Reasons as to why the waste is unacceptable
- Safety precautions to be taken

EEI will be responsible to review all materials for acceptability. If EEI accepts "unacceptables", EEI assumes all risks associated with the waste stream and their proper management and disposition.

Unknowns. Unknown materials will be taken to a pre-designated area for characterization and identification. An attempt will be made to identify unknowns on-site using a HazCat System.

Specific tests that we can perform with this system are:

1. Ignitability
2. Corrosivity
3. Reactivity
4. Presence or Absence of RCRA Metals
5. Presence or Absence of Sulfides & Cyanides
6. Presence of Peroxides
7. Determination of Oxidizers
8. PCB's
9. Presence or Absence of Halogens
10. Pesticides

Bulking of Materials. Strict procedures will be followed for the consolidation/bulking on-site of collected non-ignitable oils, antifreeze, and solvents in 1 gallon or greater containers. Solvents in less than 1 gallon plastic or metal containers will be "loose-packed". Solvents in less than 1 gallon glass containers will be "lab-packed". Only DOT approved 55 gallon drums will be used as receptacles for bulking/consolidation. All precautionary measures will be taken to limit splashing of materials and containment of any spillage during this bulking operation. Personnel performing this function will be in protective equipment (tyvek suits, latex or heavy rubber gloves and air purifying respirators).

EEI will blend on site the following solvents:

Acetone	methyl ethyl ketone	xylene
Alcohols	methyl isoamyl	
butyl acetate	methylene chloride	
cyclohexane	mineral spirits	
dimethylsulfoxide	octane	
ethyl acetate	octanol	
ethyl benzene	pentanone	
ethyl butyl ketone	perchloroethylene	



gasoline	petroleum ether
heptanes	petroleum oils
isobutyl acetate	petroleum distillates
isopropyl acetate	propyl acetate
kerosene	tetrachloroethylene
ketone	tetrabromoethane
lacquer thinner	toluene
methyl acetate	vegetable oils

EEI will not blend the following reactive materials on-site:

plasticizers, curing agents, hardeners, activators, catalysts, isocyanates and part A and B epoxy resins.

EEI will not blend the following OSHA listed or suspect Carcinogens:

benzene	dichloromethane
carbon tetrachloride	1,4 dioxane
chloroform	formaldehyde

**EEI will not blend the following solvents due to toxicity:
(TLV <50 ppm)**

acetonitrile	dichloromethane
benzene	1,4 dioxane
butoxyethanol	formaldehyde
carbon tetrachloride	phenol
chlorobenzene	tetrachloroethane
chloroform	

A designated area for bulking materials will be predetermined by the Project Manager and Site Manager. Such an area will be away from the main collection and packaging areas, if possible with a buffer zone in between. Spill equipment will be staged in close proximity. The ground underneath and surrounding the collection drums will be layered with heavy gauge plastic and diked with small amounts of absorbent for spill containment. All waste receptacles will be properly bonded and grounded. Only non-sparking tools will be used for container opening and closure. No monitoring equipment is required for our process, and an air pollution permit is not required as well.

HHW to be "lab packed" or "loose-packed" are segregated into DOT hazard classes. Further segregation then occurs based upon the compatibility of materials within those hazard classes.

Following this segregation and classification, all materials are then packaged into DOT specification 17H, 55 gallon open head steel drums with sufficient absorbent for cushioning and spill prevention. All closure, labeling and marking of containers is then performed in accordance with DOT requirements per 49 CFR 172.

Labeling, Manifesting and Placarding. Containers are labeled in accordance with 40CFR 261 and 262 as well as 49CFR 172.100, 49CFR 172.101 and 49 CFR 172.400. This includes Generator/Shipping description, labels, hazard class and other required markings. EEI will be listed as the generator on the above labels.





A hazardous waste manifest will be used as a shipping document in accordance with 40CFR 262, 40CFR 263 and 49CFR 172. The manifest will indicate EEI as the generator. A copy of the completed manifest(s) will be provided for the District's use prior to departure from the site. All vehicles transporting HHHW shall be placarded in accordance with 49CFR 172 Subpart F.

Site Clean-up/Demobilization. Following the close of the event, site cleanup will begin. Final packaging of any materials still in the collection areas will be performed. All documentation (manifest preparation, etc.) will be completed. Packaged and labeled containers will be loaded onto transport vehicles. Vehicles will be placarded appropriately in full compliance with DOT regulations. Traffic barriers will be removed and returned to owners (if supplied by local highway, law enforcement, or District Officials). All trash will be picked up and placed in roll-off boxes which will then be secured with tie down tarps for transport. Tents will be taken down and all ground covers removed and placed in trash for removal by EEI. Upon completion of these operations, EEI will conduct a visual walk through inspection with the Site Coordinator/District representative to assure return of the site to its original condition, and that EEI has performed all contract requirements to the satisfaction of all parties involved.

Waste packaging. The following packaging methods will be used for all material received from residents during the HHHW Collection Event:

1. Consolidation
Motor oil, antifreeze and solvents greater than 1 gallon will be bulked (pour out on site).
2. Loose-pack Containerization for the following:
 - a. Oil Paints
 - b. Latex Paints
 - c. Aerosols
 - d. Asbestos
 - e. Adhesives/Resins/Solid Paints
 - f. Button/Nickel/Cadmium/Household Batteries
 - g. Solvents, Thinners, Gasoline less than 1 gallon in metal or plastic
 - h. Pints & Quarts of Paint
 - i. Fluorescent Lights
 - j. Ignitable liquids
 - k. Cleaners
 - l. non-regulated liquids and solids
3. Lab Pack Containerization for the following:
 - a. Reactives
 - b. Acids/Bases
 - c. Oxidizers
 - d. Solid/Liquid Pesticides and Poisons
 - e. Halogenated Solvents
 - f. Flammable liquid less than 1 gallon in glass containers.

For cost reduction purposes, EEI will use the following types of containers:

1 cubic yard Triwall Boxes will be used to package pints, quarts, gallons, and 5 gallon paint containers, 55 gallon steel drums may also be used for pints and quart containers. 55 gallon steel drums will be used to bulk solvents, oils, antifreeze, etc. Only containers of 1 gallon or greater capacity will be bulked. Smaller containers will be loose packed in 55 gallon open head drums.





55, 20, and 5 gallon DOT approved containers will be used for all lab pack per DOT regulation found in 49 CFR 173.12 with sufficient cushioning/sorbent material as specified. EEI is party to DOT exemption #DOT-E 9723 & #DOT-E 10441 which allow us to transport cyanides and acids in the same vehicle if need be. This saves the District the expense of a dedicated truck for cyanides. This savings is included in our pricing.

55 gallon steel drums will be used to loose pack miscellaneous ignitable wastes and non-regulated wastes which are not glass and not bulked. This packaging is considered an overpack by DOT not a lab pack.

55 gallon steel drums will be used to package all asbestos wastes. Prior to placing in the drum all asbestos will be wrapped or placed in plastic.

EEI uses cubic yard boxes for the packaging of one gallon, five gallon, pint and quart containers of paint waste. By comparing this method to the bulking of paint on-site we have found that our method is more cost effective. The weight of a yard box (35 lbs) plus the weight of the paint cans (10 lbs) is still less than the weight of a 55 gallon steel drum (52 lbs) used for on-site bulking. Also our price for paint filled yard boxes includes the disposal of the cans once they are processed at our facility.

Upon receipt at EEI, we have three platform scales for determining the weights of materials resulting from a Household Hazardous Waste Collection event. These scales are used to determine the gross and net weights used for billing on this effort. The net weights correspond to each unit of material manifested from the collection site. These are recorded on weight sheets.

When performing lab packing, EEI strives to package materials as efficiently as possible to keep to a minimum the number of shipping containers. EEI will provide container packing lists to the District for all lab packs to document drum contents. Any and all "lab pack" containerization performed by EEI is in strict accordance with U.S. DOT requirements as specified in 49CFR, Part 173.12. DOT's lab pack limits are:

Shipping Container Size	Max. Vol. Liquids	Max. Vol. Solids
85 Gallon	55 Gallons	450 lbs.
55 Gallon	20 Gallons	450 lbs.
30 Gallon	12 Gallons	300 lbs.
16 Gallon	7 Gallons	160 lbs.
5 Gallon	2 Gallons	45 lbs.

WASTE MATERIALS MANAGEMENT. EEI has processed over 100,000 drums of household hazardous waste. Most of these wastes have been recycled/reused. EEI will be the final recycle/treatment facility for many of the wastes that are to be collected from District residents. Information regarding EEI's facility, capabilities and Transportation Division are included in the Qualifications Statement.

Pursuant to EEI's sequence of disposal methods, the ultimate process of each accepted waste is listed below:



1. Paints - **Fuels Blending/Reuse**
2. All Batteries - **Recycling**
3. Motor Oil - **Fuels Blending/Reuse/Recycling**
4. Antifreeze - **Reprocessing for Reuse**
5. Solvents (Gasoline, Thinners, etc.) - **Fuels Blending/Reuse**
6. Pesticides & Poisons, Solid & Liquid – Incineration or Secure Landfill
7. Aerosol Cans - **Fuels Blending/Metal Recovery & Gas Utilization**
8. Acids/Bases - **Reuse/Aqueous Treatment**
9. Reactives – Incineration or Hydrolysis
10. Asbestos - Landfill
11. Adhesives - Incineration
12. Oxidizers – **Reuse** or Aqueous Treatment
13. Poly-chlorinated Biphenyls (PCB's) - Incineration
14. Fluorescent Light Tubes - **Recycling**
15. Propane Cylinders - **Reuse/Recycling**
16. Clean Cardboard/Paper/Plastic - **Recycling**
17. Smoke Detectors – Secure Landfill
18. Pharmaceuticals – Wet Shredding

EEI will manage all waste materials that EEI accepts in this order: (1) Reuse, (2) Recycling, (3) Incineration, and (4) Land Disposal as permitted by law.

Environmental Enterprises, Incorporated (EEI) is a commercial treatment facility and does not create waste, but generates treatment residues of wastes shipped to us for treatment. Each of these waste streams consists of only the material that cannot be practically treated by any other method. EEI strives to provide sound waste management alternatives that make use of recycling, reuse and reclamation technologies our first priority. As technologies advance and regulations change, EEI continues to search for processes that minimize disposal and maximize recycling/reuse and recovery technologies.

EEI utilizes a variety of treatment methods, such as chemical reduction, oxidation and neutralization to remove as many hazardous constituents possible from each waste stream not amenable to recycle/reuse.

EEI also recycles paints through reuse and fuels blending. All paints, including latex paints, typically contain titanium dioxide and other inorganic pigments that become raw material for feed stock. The organic portion of the paint is used as fuel. This recycling process reduces the amount of raw materials and fossil fuels required in the manufacturing of Portland Cement.



LITHIUM, LITHIUM ION AND MAGNESIUM BATTERIES

THESE GUIDELINES ARE WRITTEN TO TAKE INTO ACCOUNT U.S. DOT REGULATIONS. EEI HAS ADOPTED THESE GUIDELINES TO ENSURE NOT ONLY DOT PACKAGING COMPLIANCE BUT ALSO TO ENSURE THAT LITHIUM BATTERIES ARE HANDLED AND PACKAGED SAFELY FROM THE POINT OF GENERATION THROUGH RECEIPT AT EEI.

General Packaging Guidelines

1. Do not mix Category 4 batteries with any other type of battery to ensure chemical and USDOT compatibility. Mixing this category with others could cause explosion or fire.
2. Containers are limited to 5-gallons maximum in size (66 lb. gross weight per container).
3. Since Lithium is a water-reactive metal, all batteries must be kept dry.
4. Package batteries to protect against short circuits and to withstand the shocks normally incident to transportation. This can be completed by taping all terminals or contacts with electrical tape or contact covers. Failure to protect terminals will lead to a fire or explosion during storage and/or transportation!
5. Batteries must be cushioned from contact with other batteries by layering with vermiculite, speedi-dry or kitty litter. Failure to properly cushion could lead to a direct short, fire or explosion during storage and/or transportation!
6. Leaking batteries must be packaged separately and shipped as a hazardous waste. All free liquid must be separated from the battery casing and containerized. Under no circumstances may free liquid be shipped in the same container as the battery casing! A separate recycling profile must be completed for leaking batteries and battery "free liquid". Contact EEI sales for more information.
7. All batteries must be segregated by DOT compatibility and packaged in accordance with USDOT regulations.

All batteries must be segregated (leaking from non-leaking) and packaged in accordance with USDOT regulations.

Package non-leaking batteries in one of the following USDOT containers at the Packing Group II performance level – 5-gallon pail maximum outer shipping container:

1. 1A2 – 5-gallon steel, removable head drum with a minimum 4 mm thickness plastic drum liner;
2. 1H2 – 5-gallon plastic, removable head drum; or,
3. 1G2 – 5-gallon fiberboard drum.

Place each batter in individual plastic bags; OR,

Use original packaging in which the batteries were received; OR,





Place a piece of electrical (insulation) tape over each terminal to avoid terminal contact. Failure to protect terminals will lead to a fire or explosion during storage and/or transportation!

Provide cushioning for each battery to prevent contact with other batteries by layering with vermiculite, speedi-dry or kitty litter. Failure to provide adequate cushioning will lead to a fire or explosion during storage and/or transportation!

Packaging Leaking Category 4 Batteries

Leaking, Category 4 batteries must be packaged as follows:

1. Separate all free liquid from battery casing. This liquid should be placed in a poly 1H1 drum or other DOT container compatible with the battery liquid. Profile this solution separately using an EEI profile.
2. Place the battery carcasses in a poly drum liner (4 mil thickness) and place in a poly 1H2 (removable head) drum. Once again, leaking batteries must be profiled separately from non-leaking batteries for special handling considerations.
3. Do not pack battery carcasses with vermiculite, desiccant or packaging material.
4. Leaking batteries must be labeled and shipped as a hazardous waste.

Labeling Requirements

1. Attach a Hazard Class 9 label to the outer container.
2. Attach a packing slip to the outer container. The packing slip should indicate description, total count and weight of the container.
3. If shipping via a Bill of Lading, attach a Universal Waste Label to the container. If shipping via a Hazardous Waste Manifest, attach a Hazardous Waste Label to the container.

USDOT Proper Shipping Name for Lithium and Lithium Ion Batteries:

Universal Waste: Shipping via a Bill of Lading

Lithium batteries, 9, UN3090, PG II (Used lithium batteries for recycling) (ERG 138)

Hazardous Waste: Shipping via a Hazardous Waste Manifest

Waste lithium batteries, 9, UN3090, II (Used lithium batteries for recycling) (ERG 138)

Note: EPA Hazardous Waste Number D003 (reactive) should be entered in item I of the manifest. Enter "RQ" before the shipping description if a shipping container contains equal to or greater than 100 pounds of reactive hazardous waste.

USDOT Proper Shipping Name for Magnesium Batteries:



Universal Waste: Shipping via a Bill of Lading

Batteries, dry, not USDOT-regulated (Used magnesium batteries for recycling)

Hazardous Waste: Shipping via a Hazardous Waste Manifest

Use the shipping name listed above under the “Universal Waste” shipping descriptions and add the word “Waste” before the proper shipping name. Note: “NONE” should be entered in lieu of an EPA Hazardous Waste Number in Item I of the manifest.



Emergency/Spill Contingency Plan

Prepared By:

**Environmental Enterprises, Inc
Midwest Environmental Transport, Inc.
10163 Cincinnati-Dayton Road
Cincinnati, Ohio 45241**

March 2005



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TRANSPORTATION SPILL CONTINGENCY PLAN AND CLEAN-UP PROCEDURE

Introduction

Adhering to regulations set forth by the Local, State and Federal governments will greatly minimize the chance of an emergency situation during the transport of hazardous waste. If an emergency does occur, however, there are certain actions that must be taken to protect lives and property. It is essential that all persons who come into frequent contact with hazardous wastes be familiar with emergency measures. Prompt action on the part of all persons concerned will enable many emergencies to be controlled and minimize the possibility of injury and property damage.

Emergency Procedures

A. In the event of an on-the-road spill or other emergency, the driver will follow these procedures:

- a. Remain with the unit and keep unauthorized persons, including pedestrians and motorists, away from the spill area
- b. Keep open flames away from the spill site, including flares and smoking
- c. Set up warning signals on the highway
- d. Prevent leaking liquids from draining onto the highway or into sewers or streams by damming the liquid or digging a drainage ditch
- e. Contact, or have someone contact, the police or fire department by calling 9-1-1
- f. Upon arrival of the police or fire department
 1. Inform them of the type of material that has been spilled
 2. Request the area be blocked off to both pedestrians and vehicles to prevent property damage or any serious personal injury
- g. In the event of an emergency or a hazardous waste spill during transportation, the transporter will immediately notify the National Response Center (800) 424-8802 with the following information
 1. Name of person reporting the incident
 2. Name, address and Identification Number of the transporter
 3. Telephone number where person reporting can be reached
 4. Date, time and location of the incident
 5. The extent of injuries, if any
 6. Classification, name and quantity of hazardous materials/wastes involved, if such information is available
 7. Type of incident and nature of hazardous material/waste involvement and whether a continuing danger exists at the scene
 8. For each waste product involved, provide:
 - i. Name and Identification Number of generator
 - ii. Product shipping, hazardous class, and UN or NA Number
 - iii. Estimated quantity of material spilled
 - iv. If possible, the extent of contamination to land, water or air
 9. Shipping name, hazard class and Identification Number of any other material carried.
- h. Contact the emergency coordinators for Midwest Environmental Transport, Inc.
Daniel McCabe (office) (513) 772-2818, (home) (513) 777-2396 or (mobile) (513)



266-3800; notify the plant: Office (513) 541-1823 or EEL's Emergency Response Group 1-800-392-1503

1. Product or material name
 2. Customer's profile number (this is contained on the pickup order).
 3. Company name where pickup was made
 4. Amount spilled
 5. Amount of gallons of material on truck
 6. Cause of spill (drum leaking, defective valve on tanker, traffic accident, etc.)
 7. If possible to make an on-site repair, what is needed
 8. Exact location of occurrence
- i. The Local Emergency Planning Committee (LEPC) shall be contacted and informed of the occurrence and the nature of the spill.
 - j. The transporter will submit a report of the incident in writing as required by 49 CFR 171.16 to the Chief, Information System Division, Transportation Programs Bureau, Department of Transportation, Washington, DC 20590 and send copies of the report to the generator as required.
 - a. Emergency Coordinators shall report the spill to:
 - b. Midwest Environmental Transport, Inc.
10163 Cincinnati-Dayton Road
Cincinnati, Ohio 45241
513-772-1145
 - a. Environmental Enterprises, Inc.
10163 Cincinnati-Dayton Road
Cincinnati, Ohio 45241
513-772-2818
 - b. National Coast Guard
205-690-2286 or 334-639-6287
 - c. U. S. National Response Center
800-424-8802 or 202-426-2675
 - d. Chemtrec
800-424-9300
 - e. Hazardous Material/Waste Incidents
800-843-0699
 - f. Alabama Emergency Management Agency
800-356-9596 or 205-280-2200
 - g. Alabama Department of Public Safety
334-242-4378



B. Emergency response actions to be taken at the scene of the spill include:

- a. Containment is necessary to prevent the escape of any spill liquid or solid onto the ground or into a storm or sanitary sewer. A barrier must be erected immediately to prevent escape of spilled materials/waste liquids, using whatever material is at hand, even a dirt curb to prevent spreading of the spill. Containment of solids will be dependent on wind and weather conditions, use the tarpaulin in the vehicle or plastic (available at most supply stores) if conditions are wet and windy.
- b. Simultaneously, the source of the spill or leak must be located and controlled, e.g., a drum plugged or taped, or turned upside down.
- c. The possibility of evacuation should be considered in the event of a major spill (e.g., a collision with another vehicle or a loaded trailer that has turned over, with subsequent container(s) rupturing). Major concerns involve ignitable wastes that may catch fire and possibly explode or generate toxic fumes. If fire threatens or actually occurs, personnel should be evacuated a distance of at least a half-mile as recommended by the Emergency Response Guidebook. If no fire threatens, and no container(s) have ruptured, a distance of 50-100 feet should suffice.
If the shipping description is known (refer to the manifest) find the name in your Emergency Response Guidebook in the blue pages and turn to the Corresponding Guide Number (orange top page – last $\frac{1}{3}$ of book). If the shipping description is not known check the placard on the vehicle for a “UN” or “NA” number, look up the number in the yellow pages and refer to the Corresponding Guide Number; or contact the generator of the waste for safety data.
- d. Cleanup can begin once containment has been achieved and the spillage source has been controlled. If the spill is contained on an impervious paved surface, material should be absorbed onto a compatible material (e.g., sand or diatomaceous earth). Any of a number of commercial absorbent inert materials may be used, but make sure they are compatible with the waste and will not cause a reaction. If the spillage has reached earth, all contaminated dirt should be collected into drums or bags for disposal at an EPA approved site.
If any spilled waste has reached the ground, the contaminated soil will be removed. The extent of contamination will be determined by sampling the spill area. A qualified laboratory will analyze the sample. Sampling techniques, chain of custody requirements, and analytical methods will follow approved procedures such as those outlined in SW-846. Any soil exhibiting contamination above the local background level will be removed to an appropriate permitted disposal site.
In addition to contaminated absorbents, dirt, or the like as noted above, damaged containers also present a disposal problem. Special “recovery drums” (oversize metal drums or overpacks) will be used for containing damaged 55-gallon drums. Disposal will be at an approved site.

C. Emergency Equipment:

- a. Emergency Tractor/Trailer Equipment
 1. Fire extinguisher is in the cab of the tractor
 2. First aid kit with buffer solution
 3. Reflective triangles or flares
- b. Drivers Safety Kit
 1. Respirator



2. Gloves
3. Hard hat
4. Tyvek suit
5. Safety glasses
6. Spare clothes
7. First aid kit
8. Bottle of buffer solution
- c. Label Kit
 1. Packing list and envelopes
 2. DOT labels (4"x4")
 3. Gloves
 4. Clipboard
 5. Spare manifests and LDR Certification sheets
 6. Ratchet and Sockets
 7. Bill of Lading forms
 8. Emergency Response Guidebook
 9. Stapler
 10. Hazardous Materials Compliance Pocket Book
 11. Select placards
- d. Spill Kit
 1. 85 gallon overpack drum
 2. Small shovel and broom
 3. 5 gallon pail
 4. Sheet of plastic
 5. Oil dry (2 bags)
 6. Duct tape

D. Follow-up Procedures:

- a. Decontamination – A truck or trailer exposed to a spill or leak will be decontaminated at the site in order to prevent any further release to the extent that it can be transported (or move under its own power) to an authorized facility capable of further decontamination if necessary.
- b. Equipment will be decontaminated in the following manner:
Each item used will be placed in an open head container and thoroughly rinsed with a compatible solvent or cleaning compound. The residue or wash water will then be drained into a tight head container, sealed, and disposed of in accordance with Federal and State Regulations at an authorized disposal site.
- c. Contaminated clothing will be placed with the cleanup residue and disposed of in accordance with Federal and State Regulations at an authorized disposal site. If clothing is reusable, then it will be decontaminated properly and the residue added to the other waste.
- d. Notification – The Department of Transportation, Director of Hazardous Materials Registration, Materials and Transportation Bureau, Washing, DC 20590 will be notified, in writing, of the occurrence, and nature of the incident and a copy will be submitted to the Alabama Department of Environmental Management, 1751 Cong. W.L. Dickinson Drive, Montgomery, Alabama 36130-1463.



E. Training Program:

- a. In preparation for handling hazardous materials and hazardous wastes, all drivers and response personnel receive approximately six (6) hours classroom training conducted by Regional Office personnel followed by refresher training by local management at regular scheduled (at least monthly) safety meetings. In addition to the above, an annual Regional meeting is held to educate further each Branch Operation Supervisor on changes in regulations.
- b. The following is a list of classroom training provided to all branch personnel responsible for the handling and storage of hazardous waste:
 - 1. Hazardous Waste Manifesting
 - 2. Container Receiving and Maintenance
 - 3. Container Inspections
 - 4. Container Transferring
 - 5. Container Pickup Checklist
 - 6. Re-use of Containers for Hazardous Waste
 - 7. Emergency Response Equipment
 - 8. Emergency Procedures
 - 9. Hazardous Waste Labeling
 - 10. Product Compatibility
 - 11. In-house Maintenance Checks
 - 12. Emergency Spills
- c. Since much of the drivers' actions involve hazardous materials, including hazardous wastes, their instructions specifically include:
 - 1. Inspection of their vehicles before and during trips
 - 2. Driving Rules
 - 3. Knowledge of safety and health hazards of products carried (e.g. flammable, corrosive)
 - 4. Actions to be implemented in case of spills, accidents, or other emergencies involving hazardous materials and hazardous wastes.



HHW AND LAB PACK SPILL ACCIDENT AND CLEAN-UP PROCEDURE

Introduction

Adhering to regulations set forth by the Local, State and Federal governments will greatly minimize the chance of an emergency situation during the collection of household hazardous waste. If an emergency does occur, however, there are certain actions that must be taken to protect lives and property. It is essential that all persons involved with HHW Events and who come into frequent contact with household hazardous wastes be familiar with emergency measures. Prompt action on the part of all persons concerned will enable many emergencies to be controlled and minimize the possibility of injury and property damage.

Small Spill Procedures

Volunteers, HHW Staff and other designated responsible parties can manage all of the following small spills.

A. Small Spills (Five Gallon Pails or less) of Flammables, Paint related material (latex and oil based), Pesticides, and Non-regulated items (Oil, antifreeze, Soaps, Shampoos, etc.):

1. WEAR CORRECT PPE. The minimum is a Tyvek suit, safety glasses, shoe covers, and nitrile gloves. Special situations may require additional equipment. Dispose of contaminated PPE as appropriate.
2. READ ALL LABELS THOROUGHLY. Gather information as needed to classify material. Refer to the "Segregation of Household Chemicals – A to Z" guide for classifications.
3. When reading labels, keep containers level to prevent further spilling.
4. If bags of powdered or granular products are open to the atmosphere, close them with tape. If integrity of the bag is questionable, re-bag by placing the original bag into a plastic bag.
5. Oxidizing materials (pool chemicals for example) and organics must be kept separate from each other, as they are non-compatible.
6. If liquids have leaked, invert a clear plastic bag over the container, and holding the containers upright. Secure Bags by taping or by tying off the bag in a not.
7. Clean up all spills immediately using the appropriate spill-cleanup procedure:
 - a. Very small spills of non-corrosive and non-oxidizing materials can be wiped up with paper towels or small rags which can be disposed of in the appropriate container.
 - Rags and paper towels that have been used to absorb flammable solvents, gas, oil, oil-based paint, stain or other organic have to be placed and sealed in a sealing metal container and labeled.
 - Bagged rags and towels of pesticides/ poisons cleanups can be placed inside the poisons/solids storage container.
 - b. Larger quantities of small spills or liquids and all spills:
 - Make a circle of absorbent material around the spill to contain it.
 - Pour more absorbent material into the center of the spill.
 - Allow time for the liquid to absorb.
 - Use dust pan or shovel and hand brush or broom and scrape up the absorbent material.



- Package contaminated absorbent in a plastic bag or pail, and transfer it in the correct labeled container.
- 8. Use proper lifting techniques and wear the appropriate PPE.
 - a. If any containers are leaking, a rubber apron is required in addition to all the usual PPE.
 - b. In cold weather, the nitrile gloves get stiff and can cause reduced dexterity. Use appropriate gloves for conditions.
- 9. If there is a site-safety emergency and an alarm sounds—
 - a. Exit the area immediately
- b. Go to the designated staging area and await instruction from the Project Manager.

B. Small Spills (Five Gallon Pails or less) of Corrosive Chemicals:

1. WEAR CORRECT PPE. The minimum is a Tyvek suit, safety glasses, shoe covers, and nitrile gloves. Special situations may require additional equipment. Dispose of contaminated PPE as appropriate.
2. READ ALL LABELS THOROUGHLY. Gather information as needed to classify material. Refer to the “Segregation of Household Chemicals – A to Z” guide for classifications.
3. When reading labels, keep containers level to prevent further spilling.
4. Acids and bases must be kept separate from each other as they are non-compatible.
5. If there are open bags of powdered or granular products, tape them shut. If the bags appear fragile, re-bag them in place by rolling the original bag into a plastic bag.
6. If liquids have leaked, invert a plastic bag over the container, and holding the containers upright, bring the bag up over the container.
7. Secure Bags by taping them shut or by tying off the bag in a not. A clear bag is recommended as this facilitates further label reading and secondary segregation
8. Clean up all spills immediately using the appropriate spill-cleanup procedure:
 - a. Even small spills have to be cleaned up with oil dry absorbent which can be disposed of in the appropriate corrosive spill bin. This must be placed into a bag and placed into the same appropriate cart or drum as the bag covered container.
 - b. Larger quantities of small spills or liquids and all spills:
 - Make a circle of absorbent material around the spill to contain it.
 - Pour more absorbent material into the center of the spill.
 - Allow time for the liquid to absorb.
 - Use dust pan or shovel and hand brush or broom and scrape up the absorbent material.
 - Package contaminated absorbent in a plastic bag or pail, and transfer it in the correct labeled container.
9. Use proper lifting techniques and wear the appropriate PPE.
 - b. If any containers are leaking, a rubber apron is required in addition to all the usual PPE.
 - c. In cold weather, the nitrile gloves get stiff and can cause reduced dexterity. Use appropriate gloves for conditions.
10. If there is a site-safety emergency and an alarm sounds—
 - a. Exit the area immediately
 - b. Go to the designated staging area and await instruction from the Project Manager.

C. Small Spills (Five Gallon Pails or less) of Oxidizing Chemicals:



1. WEAR CORRECT PPE. The minimum is a Tyvek suit, safety glasses, shoe covers, and nitrile gloves. Special situations may require additional equipment. Dispose of contaminated PPE as appropriate.
2. READ ALL LABELS THOROUGHLY. Gather information as needed to classify material. Refer to the “Segregation of Household Chemicals – A to Z” guide for classifications.
3. When reading labels, keep containers level to prevent further spilling.
4. Oxidizing materials (pool chemicals and stump removers for example) and flammable organics must be kept separate from each other as they are non-compatible and may cause violent reaction, smoking and even fires.
5. If there are open bags of powdered or granular products, tape them shut. If the bags appear fragile, re-bag them in place by rolling the original bag into a plastic bag.
6. If liquids have leaked, invert a plastic bag over the container, and holding the containers upright, bring the bag up over the container.
7. Secure Bags by taping them shut or by tying off the bag in a knot. A clear bag is recommended as this facilitates further label reading and secondary segregation.
8. Clean up all spills immediately using the appropriate spill-cleanup procedure:
 - a. Even small spills have to be cleaned up with oil dry absorbent that can be disposed of in the appropriate oxidizer spill container. This must be placed into a bag and placed into the same appropriate cart or drum as the bag covered container.
 - b. Larger quantities of small spills or liquids and all spills.
 - Make a circle of absorbent material around the spill to contain it.
 - Pour more absorbent material into the center of the spill.
 - Allow time for the liquid to absorb.
 - Use dustpan or shovel and hand brush or broom and scrape up the absorbent material.
 - Package contaminated absorbent in a plastic bag or pail, and transfer it in the correct labeled container.
9. Use proper lifting techniques and wear the appropriate PPE.
 - a. If any containers are leaking, a rubber apron is required in addition to all the usual PPE.
 - b. In cold weather, the nitrile gloves get stiff and can cause reduced dexterity. Use appropriate gloves for conditions.
10. If there is a site-safety emergency and an alarm sounds
 - a. Exit the area immediately
 - b. Go to the designated staging area and await instruction from the Project Manager.

D. Special Chemical:

1. Staff members should handle special chemical spills.
2. Never try to
 - a. Overpack a drum,
 - b. Contain a spill larger than 5 gallons,
 - c. Handle spills that contain Spontaneous Combustion mixtures or Dangerous When Wet items.

“When in doubt exit the area, then ask.”

Large Spill Procedures





A. Larger Spills:

1. Leave area immediately.
2. Drum Spills-Report spill to Project Manager.

Large emergency spills/ Haz-Mat Team (see also Spills Procedures)

1. Report spill to Project Manager and surrounding personnel as loudly as possible as you exit the Area.
2. Criteria Summary:
Small Spills (See "Small Spill Procedures" For Details):
 - Staff can handle most 5-gallon or less spills in house.Large Spills (See "Leaks and Large Spill Procedures" For Details):
 - Leaking or gushing drums are to be handled by staff only.
 - Large spills off our pads only HAZ-MAT Team members may address. Call 911.
3. Cell phone on site or a remote phone (cell or neighborhood business phone, etc.) should be used far enough away from the area so as not to be exposed to smoke or sudden explosions. Only call 911 if someone does not come out of the area. Only call the HAZ-MAT team if a drum or bigger tank is leaking.
4. Meet out at the assembly post.
5. Await staff for instructions.
6. Do not allow anyone to enter the assembly post.
7. When the proper officials (fire team, police, Haz-mat team, etc.) arrive tell them what you know of the situation. Stay out of their way. Include areas of distress and number of people known by you to still be remaining in the spill area.

B. Leaks and Spill Procedures:

1. Leave area immediately and report large spills to Project Manager.
2. For spills of even larger quantities (tanks) and/or off our protected area call 911 for the local Haz-Mat team members. Worse case scenarios where fires are involved call 911.
3. Special Chemical spills shall be handled by staff members or the Haz-Mat team.

C. Leaking drums outside the containment area:

1. Wear the correct PPE (including respirators if needed) as prescribed by staff or by the similar hazard class pointed out in the Segregation Guide and in the Procedures Guide. Always use a drum dolly or forklift to move leaking drums. Air monitoring may re-evaluate the PPE worn in an area.
2. A drum that drips can be overpacked by using the chain hoist:
 - A. Have an open 85-gallon overpack ready for leaky 55-gallon drums (or a 55 gallon drum used as an overpack for smaller 30 gallon containers).
 - B. Place the drum underneath the hoist and lower the hoist so that the hook is almost at the top of the drum.
 - C. Put the chime clamps over the chimes (the top crease) of the drum.
 - D. Raise the chain/ hoist until tension holds the clamps in place. Push the drum down while the clamp is raised to ensure proper tension lock.
 - E. Raise the drum up to the top of the level of the overpack container. At this point no one including the operator should be under the raised leaking drum.



- F. Place the open overpack drum under the leaking drum (never placing body parts directly under the suspended drum)
- G. Lower the drum into the overpack until the clamp tension is gone. Remove the clamp. Seal the overpack and place appropriate labels and markings on the drum.
- H. Remediate the dripped material as mentioned in The Small Spill Procedures.



Hazardous Materials and Waste Operations Health and Safety Plan

Prepared By:

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1.0 INTRODUCTION

This Site Health and Safety Plan (HASP) provides the protocol for the general protection of employee and public safety and health during waste removal by Environmental Enterprises, Incorporated (EEI). This HASP shall be reviewed periodically and be amended as appropriate to reflect previously unanticipated hazards or changes in operation condition during removal activities.

1.1 Scope and Applicability

The purpose of this HASP is to define the requirements and designate protocols to be followed by all persons who may have business at the site during removal of waste. Removal activities include: identification, segregation, packaging, and transport of material.

The HASP provides safety and health procedures for onsite work, including personal protective equipment of onsite workers, site operations description, site waste characteristics, assessment of potential site hazards, decontamination procedures, and emergency procedures.

Applicability of provisions of the HASP extends to all EEI employees, contractors, subcontractors, government employees, invitees, licensees, visitors, and all other persons who are on the site.

All EEI employees and employees of contractors shall operate within the current OSHA laws and regulations including Parts 1926 and 1910.120, the OSHA HAZWOPER Standard, within all applicable EPA laws and regulations, and all other applicable federal, state and local laws and regulations.

All personnel on site, contractors and subcontractors included, shall be informed of the site emergency response procedures and any potential fire, explosion, toxic, health, physical, or safety hazards of the operation.

This plan must be reviewed and be signed by all personnel prior the start of work (Attachment 3). Contractors, if they so desire, are permitted to adopt a HASP that is more protective than this HASP but at no time shall a less protective HASP be used by any contractor.

During development of this plan, consideration was given to current safety standards as defined by EPA/OSHA/NIOSH, health effects and standards for known contaminants, and procedures designed to account for the potential for exposure to unknown substances. Specifically, the following reference sources have been consulted and followed whenever applicable:

- U.S. OSHA Title 29 CFR 1910.120, 1000, and other applicable sections of Title 29 Section 1910
- Resource Conservation and Recovery Act, Subtitle C, Section 3004
- U.S. EPA Title 40 CFR Parts 264, 270 and 311
- State of Ohio Statutes and Regulations
- U.S. EPA, OERR ERT Standard Operating Safety Guides
- OSHA/NIOSH/EPA/USCG Occupational Health and Safety Guidelines.
- National Institute for Occupational Safety and Health (NIOSH) Pocket Guide to Chemical Hazards



- American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values (TLVs)

Beyond requirements imposed by regulation, general principles of good industrial and chemical hygiene practice and sound occupational and environmental safety practice are also applicable at all times and in all situations that may be present at the site.

2.0 KEY PERSONNEL/IDENTIFICATION OF HEALTH AND SAFETY PERSONNEL

2.1 Regulatory Agencies

The following agencies have regulatory jurisdiction over the planned activities and personnel at the site:

- United States Environmental Protection Agency
- Tennessee Department of Environment and Conservation
- United States Department of Labor, Occupational Safety and Health Administration.

2.2 Site Specific Health and Safety Personnel

The Project Manager assigned to this removal activity has primary and general responsibility for ensuring that the provisions of this HASP are adequate and implemented in the field. However, a Site Safety Officer may be assigned to monitor safety and compliance throughout the project. The Site Safety Officer shall report any and all safety concerns to the Project Manager, facility owner/management, or client contact immediately upon discovery. The Site Safety and Health Officer shall have the authority to “stop work” if deemed warranted due to an imminent danger to human health or the environment. Work will not recommence until all EEI and client representatives are satisfied that the danger has been adequately controlled.

2.3 Organizational Responsibility

EEI shall have site responsibility and authority for ensuring safety and health during the removal of wastes. The client has the right to audit the health and safety plan of the contractor at any time during the performance of onsite work activities. Any violations noted by the client shall be corrected immediately.

3.0 WORK ZONES

Following characterization, work zones should be clearly delineated prior to the operations. One of the basic elements of an effective site control program is the delineation of work zones at the site. The purpose of establishing work zones is to:

- Reduce the accidental spread of hazardous substances by workers or equipment from the contaminated areas to the clean areas;
- Confine work activities to the appropriate areas, thereby minimizing the likelihood of accidental exposures;
- Facilitate the location and evacuation of personnel in case of an emergency; and
- Prevent unauthorized personnel from entering controlled areas.



The Exclusion Zone is the area where contamination is either known or expected to occur and where the greatest potential for exposure exists. The outer boundary of the Exclusion Zone, called the Hotline, separates the area of contamination from the Contamination Reduction Zone. The Hotline should initially be established by visually surveying the site and determining the extent of hazardous substances, discoloration, or any drainage, leachate, or spilled material present.

The Contamination Reduction Zone is the area in which decontamination procedures take place. It is the transition area between the Exclusion Zone and the Support Zone. The purpose of the Contamination Reduction Zone is to reduce the possibility that the Support Zone will become contaminated or affected by the site hazards.

The Support Zone is the uncontaminated area where workers are unlikely to be exposed to hazardous substances or dangerous conditions. Because the Support Zone is free from contamination, personnel working within it may wear normal work clothes. Any potentially contaminated clothing, equipment, and samples (outer containers) should remain inside the Contamination Reduction Zone or the Exclusion Zone.

4.0 TASK/OPERATION SAFETY AND HEALTH RISK ANALYSIS

4.1 Ventilation and Environmental Control Technology

It is a well-accepted principle of industrial hygiene and occupational health compliance that the use of personal protective equipment is the last line of protection against occupational health hazards. Any ventilation systems in place shall be used at all times during identification, segregation and packaging activities.

4.2 Waste Characteristics

Table 1 presents the types of waste material that could potentially be onsite. Each waste category is identified by its Department of Transportation Hazard Class and its EPA Hazard Code.

4.3 Toxic Risk Analysis of Removal Operations

The evaluation of toxic hazards is based upon EEI experience and anticipated risks posed by the specific operation during all removal activities. The following subsections describe each task/operation in terms of the specific hazards associated with it. In addition, the protective measures to be implemented during completion of those operations are also identified.

The following tasks or unit operations may occur:

- Materials handling (unloading), including small containers and full bulk containers of waste
- Segregation and packaging of hazardous materials/wastes
- Bulking/consolidating selected wastes (i.e. solvents/fuels, oils, and antifreeze)
- HAZCAT analysis





4.4 Chemical Hazards

The major chemical hazards expected to be encountered during work at the sites are:

SOLVENTS (volatile aliphatic and aromatic hydrocarbons, halogenated hydrocarbons)

Minor acute (short term) exposure to solvents may result in fatigue, and also in dizziness or confusion, which may manifest itself as accident proneness. Chronic (long term) exposure may cause dermatitis, decreased neurological function, and aggravation of existing respiratory conditions. Moderate to severe acute exposure may result in more pronounced dizziness and breathing difficulties associated with pulmonary edema or the aggravation of existing respiratory conditions such as asthma or emphysema.

PESTICIDES AND OTHER POISONS

Though normal contact with pesticides and other poisons at these events will be very minimal, exposure associated with an unanticipated spill might produce a wide variety of respiratory or neurological symptoms. EEI personnel will be advised to be very aware of any unusual symptoms in themselves and their fellow workers following any non-routine exposure, no matter how slight, to any poison or suspected poison.

ACIDS AND BASES

Skin contact with an acid or a base may cause chemical burns. Inhalation of vapors from a strong acid or base may cause pulmonary edema (fluid in the lungs), which may occur immediately, or many hours later. Protection from inhalation exposure may be accomplished by the wearing of a respirator with **acid gas** cartridges. Personnel who suspect that they may have breathed acidic or caustic vapors should notify their Lead Tech, and should be alert for the next 24 hours to any delayed onset respiratory symptoms, and should be prepared to seek medical attention in the event that symptoms are noticed.

Inhalation and dermal contact are the primary exposure pathways for these chemicals. It is not anticipated that concentrations of any chemical will reach the permissible exposure limit (PEL). Protective clothing will be mandatory for field personnel working at the site. Respirators will be within easy reach should irritating odors be detected or irritation of the respiratory tract occur. At such a time, personnel will evacuate the area or don respirators without waiting for instruction.

4.5 Task Hazard Analysis

Table 3.1 below gives the hazards expected with each task associated with the removal of waste materials from the site and the minimum level of personal protective equipment (PPE). Levels may be upgraded as appropriate based upon chemicals present, site conditions or as directed by the Project Manager or client representative.



TABLE 4.1. HAZARD EXPECTED AND LEVEL OF PPE

Task	Hazard	Minimum PPE
Materials handling	Sprains/strains; slip trip fall; foot hazard; leaking/damaged containers; chemical contact and exposure; heat-related illness	Level D (Tyvek coverall; steel-toes; safety glasses, latex/nitrile gloves)
Segregation and packaging	Leaking/damaged containers; chemical contact and exposure	Level D (Tyvek coverall; steel-toes; safety glasses, latex/nitrile gloves)
Bulking/consolidating	Open containers; splash; sprains/strains; slip trip fall; foot hazard; leaking/damaged containers; chemical contact and exposure; heat-related illness	Level D (Tyvek coverall; steel-toes; safety glasses, face shield; butyl/Viton gloves, apron APR as warranted or directed)
HAZCAT analysis	Open containers; splash; leaking/damaged containers; chemical contact and exposure	Level D (Tyvek coverall; steel-toes; safety glasses, latex/nitrile gloves, APR as warranted or directed)

4.6 Heat Stress

Physical work during hot weather conditions may lead to heat stress to the worker. The threat of heat stress is exacerbated when personal protective equipment is used in conjunction with the work. The risk of heat stress increases with the increase in level of protective equipment.

The reason is that the human body can function well only within a narrow range of internal body temperature (97-100 degrees Fahrenheit in the normal, healthy range). Hard work (higher metabolism) and outside environmental factors (hot sun, fire, high humidity, etc.) will cause the body temperature to rise. The body will seek to compensate by triggering cooling mechanisms to dissipate the build-up of body heat. There are two basic ways the body cools itself:

1. Perspiration or the release of water as sweat through the skin and sweat glands. Once released, the sweat will evaporate into the atmosphere, thereby cooling the skin and body through absorption of heat of vaporization. This is the primary cooling mechanism.
2. Changes in blood flow to dissipate internal heat by convection. This is observed as the "flushing" or reddening of skin in severe cases of heat stress.

Protective equipment work around the body while providing protection against toxic chemicals, effectively interferes with the evaporation of perspiration and the convection of heat away from the body. The humidity inside a protective suit builds up rapidly and the liquid sweat collects inside the suit, around the shoes and cannot provide cooling by absorbing the heat of vaporization.

All employees who are required to use personal protective equipment will be trained in the recognition and prevention of heat stress.



Major Heat Stress Disorders

Heat cramps: These are painful spasms that occur in the skeletal muscles of workers who have been losing sweat over a period of time. Essential salts or electrolytes are lost through sweating and if they are not replaced, heat cramps will set in. Fatigued muscles are prone to heat cramps that prevent heat cramps as no salt is replaced. Heat cramps may be prevented by drinking electrolytically balanced solutions that are commercially available (e.g. Gatorade) and by the eating of regular meals that contain salt.

Heat exhaustion (heat syncope): This is characterized by weakness, fatigue, dizziness, nausea, and headache. Symptoms may begin mild and progress to severe. In serious cases, the worker may vomit or lose consciousness. The skin of the affected worker is moist and clammy. Complexion is pale or flushed. Body temperature is normal or slightly higher than normal. This condition is caused by the flow of blood in dilated blood vessels of skin and lower parts of body, away from the head and brain. The worker suffering from heat exhaust must be immediately removed to a cool place, be placed lying down, and be allowed to cool off. When conscious, water can be given. Mild cases recover quickly while severe cases may require rest for several days. There are no permanent effects.

Heat stroke: This is a very serious condition that often leads to death. Heat stroke occurs when the body's heat regulation mechanism fails. This means that sweating will stop and the internal body temperature will rise rapidly. The skin is very dry and very hot to the touch. The skin may appear red, mottled, or bluish in appearance. The victim is literally over-heating inside with no ability to cool off. Unconsciousness, mental confusion, and convulsions may occur. Permanent brain damage and death can occur. The body cannot withstand overheating for any length of time. The victim must be removed to a cool place and cooled down artificially, but not too rapidly. Gently and gradually apply water to face, hands, arms, legs and other exposed body surfaces. Fan the person to help gradual evaporation of water. Next, wet whole body and continue cooling by fanning. Call for ambulance and medical assistance.

4.7 Cold Stress

Cold stress occurs when the worker must work outside under winter conditions. When exposed to a cold environment, the body will increase its rate of metabolism to generate more heat. Shivering is one way of increasing metabolism. Yet the extremities may still be chilled and may suffer frostbite. Frostbite causes the skin of the affected area to turn white or gray; pain may be felt initially but may disappear and the area may just feel numb. Severe injury may result when the extremity starts to freeze. Cold stress is exacerbated by high wind velocity (wind chill) and when the body is wet or soaked with water.

Workers must keep their core body temperature above 98.6 degrees Fahrenheit. A lowering of the core body temperature is also called hypothermia. Any lower core body temperature will cause loss of mental alertness, reduction in rational decision making ability, loss of consciousness, and death in extreme cases (at about 78 degrees Fahrenheit of core body temperature). Hypothermia victims may experience a false sensation of external warmth while the internal body temperature is falling dangerously.

Victims of frost bite and hypothermia must be removed to a warm room and the affected areas must be warmed quickly. This can be done by immersion in warm, but not hot water.



When working outside in moderately cold weather, the worker must dress warmly and keep dry. Work outside should be suspended in extreme cold and when there is a high wind chill.

5.0 PERSONNEL TRAINING REQUIREMENTS

In accordance with OSHA's 29 CFR 1910.120 regulation covering Hazardous Waste Operations and Emergency Response, all site personnel are required to be trained in accordance with the standard. At a minimum, all personnel are required to be trained to recognize the hazards on-site, the provisions of the HASP, and the responsible personnel. Furthermore, all personnel shall be trained in the provision of the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

5.1 Pre-assignment and Annual Refresher Training

Prior to arrival on-site, EEI and every contractor will be responsible for certifying its employees meet the requirements of pre-assignment training. Consistent with OSHA 29 CFR 1910.120 (e) (3), each employee should be able to provide a document certifying dates of training for general site workers. All Personnel must receive 8 hours of annual refresher training.

5.2 Medical Surveillance

All EEI personnel engaged in work at the sites that involve the use of a respirator participate in a medical surveillance program. EEI employees must be cleared by an examining physician to wear a respirator and personal protective equipment, should the need arise, while performing work at the site.

5.3 Respiratory Protection Program

EEI personnel wearing air-purifying respirators onsite should be properly trained, fit-tested and certified for use of the respirator. All respirators are to be decontaminated at the end of each workday. Persons with beards or facial hair will not be permitted to wear a respirator if a proper mask-to-face seal cannot be demonstrated by a fit test.

6.0 PERSONAL PROTECTIVE EQUIPMENT

This section describes the general requirements of the EPA designated Levels of Protection (A-D), and the specific levels of protection required for each task at the site.

6.1 Levels of Protection

Personnel wear protective equipment when response activities involve known or suspected atmospheric contamination, when vapors, gases, or particulates may be generated by site activities, or when direct contact with skin-affecting substances may occur. Full face-piece respirators protect lungs, gastrointestinal tract, and eyes against airborne toxicants.

Chemical-resistant clothing protects the skin from contact with skin-destructive and absorbable chemicals.

The specific levels of protection and necessary components for each have been divided into four categories according to the degrees of protection afforded:





Level A (if the need for Level A is expected or possible, a Site-Specific HASP should be generated): Should be worn when the highest level of respiratory, skin, and eye protection is needed. Should be used when first entering an unknown environment that is deemed to be hazardous. The use of Level A protection is anticipated for the site characterizations operations at the site of waste streams and residues that are unknown.

Level B: Should be worn when the highest level of respiratory protection is needed, but a lesser of skin protection. Level B is the primary level of choice when encountering high hazardous environments that have previously been assessed or characterized.

Level C: Should be worn when the criteria for using air purifying respirators are met, and a lesser level of skin protection is needed. Will not protect against oxygen deficient atmosphere or atmospheres containing high levels of toxic airborne contaminants. Consult OSHA regulations on permissible exposure levels and respirator protection factors.

Level D: Should be worn only as a work uniform and not in any area with respiratory or skin hazards. It provides minimal protection against chemical hazards.

Modifications of these levels are permitted, and routinely employed during site work activities to maximize efficiency. For example, Level C respiratory protection and Level D skin protection may be required for a given task. Likewise the type of chemical protective ensemble (i.e., material, format) will depend upon contaminants and degrees of contact.

The Level of Protection selected is based upon the following:

- Type and measured concentration of the chemical substance in the ambient atmosphere and its toxicity.
- Potential for exposure to substances in air, splashes of liquids, or other direct contact with material due to work being done.
- Knowledge of chemicals on-site along with properties such as toxicity, route of exposure, and contaminant matrix.

In situations where the type of chemical, concentration, and possibilities of contact are not known, the appropriate Level of Protection must be selected based on professional experience and judgment until the hazards can be better identified. The Health and Safety Officer shall review all decisions on the use of personal protective equipment, with the concurrence of the Health and Safety Director.

6.2 Level A Personal Protective Equipment

The use of Level A is not expected on this project. Level A consists of a fully encapsulated, multiple lined chemical resistant suit used in combination with a self-contained breathing air apparatus.





6.3 Level B Personal Protective Equipment

Full face-piece, supplied-air respirator (NIOSH approved) should be used. Respirators may be positive pressure-demand, self-contained breathing apparatus (SCBA), or positive pressure-demand, airline respirator (with escape bottle for IDLH or potential for IDLH atmosphere).

- Chemical-resistant clothing (overall and long-sleeved jacket; hooded, one or two-piece chemical-splash suit; disposable chemical-resistant, one-piece suits)
- Gloves (outer), chemical-resistant
- Gloves (inner), chemical-resistant
- Boots (outer), chemical-resistant, steel toe and shank
- Boot covers (outer), chemical-resistant (disposable)

The use of Level B is not anticipated during the course of this work.

6.4 Level C Personal Protective Equipment

- Full face-piece, air-purifying respirator, with canister or cartridge filter.
- Chemical-resistant clothing (overalls and long sleeved jacket; hooded, one or two-piece chemical splash suit, disposable chemical resistant one-piece suit).
- Inner and outer chemical resistant gloves.

OPTIONAL EQUIPMENT

- Coveralls
- Disposal boot covers
- Escape respirator
- Long cotton underwear (for cold weather service)

The use of level C may be required during course of this work.

6.5 Level D Personal Protective Equipment

- Uniform or work clothes
- Safety boots/shoes
- Safety glasses or chemical goggles
- Nitrile/latex gloves

OPTIONAL EQUIPMENT

- Chemical resistant gloves (inner/outer)
- Escape respirator
- Face shield and goggles

The use of Level D may be used during truck loading operations





6.6 Reassessment of Protection Program

The Level of Protection provided by PPE selection shall be upgraded or downgraded based upon a change in site conditions or findings of investigations.

When a significant change occurs, the hazards should be reassessed. Some indicators of the need for reassessment are:

- Commencement of a new work phase, such as the start of drum sampling or work that begins on a different portion of the site.
- Change in job tasks during a work phase.
- Change of season/weather.
- When temperature extremes or individual medical considerations limit the effectiveness of PPE.
- Contaminants other than those previously identified are encountered.
- Change in ambient levels of contaminants.
- Change in work scope which effects the degree of contact with contaminants.

6.7 Work Mission Duration

Before the workers actually begin work in the PPE ensembles, the anticipated duration of the work mission should be established. Several factors limit mission length, including:

- Air supply consumption (SCBA use).
- Suit/Ensemble permeation and penetration rates for chemicals (Section 5.8).
- Ambient temperature and weather conditions (heat stress, cold stress).
- Capacity of personnel to work in PPE.

6.8 Chemical Resistance and Integrity of Protective Material

Information regarding the integrity and limitations of personal protective clothing has been obtained from the manufacturer of each particular piece of equipment. PPE used for this project has been chosen with the following considerations:

- Chemical degradation i.e., Saranex, tyvek, neoprene gloves, etc.
- Protective clothing permeability, and chemical resistance.
- Effects of temperature extremes on personal protective clothing.

All personnel have been trained on the fact that no PPE is impermeable forever. Each piece of equipment provides protection from specific substances for a limited amount of time. When that time is reached, breakthrough will occur and the protective equipment must be replaced.

6.9 Standard Operating Procedures for Respiratory Protection Devices

The following subsections define standard operating procedures for air purifying respirators and self-contained breathing apparatus.



6.9.1 Cleaning and Disinfecting Self Contained Breathing Apparatus

Cleaning procedures for Self-Contained Breathing Apparatus (SCBA) face-pieces are identical to those for Ultratwin APRs. The back piece is cleaned with cleaning solution and a brush. Following cleaning, the face-piece is combined with the regulator and an operational check is performed.

6.9.2 SCBA Inspection & Checkout

SCBA's should be checked before each use and at the minimum once every month when not in active use. The directions of the manufacturer should be followed in the first place. Furthermore, the following general points should also be checked:

1. Check cylinder label for current hydrostatic test date.
2. Inspect cylinder for large dents or gouges.
3. Inspect cylinder gauge for damage.
4. Complete routine inspection of entire assembly.
5. Fill out the appropriate records with results and recommendations.

Pre-use Inspection: Perform immediately prior to donning or after cleaning.

1. Before proceeding, check that the:
 - High-pressure hose connector is tight on cylinder fitting.
 - By-pass valve is closed.
 - Mainline valve is closed.
 - Regulator outlet is not covered or obstructed.
2. Backpack and harness assembly:
 - Visually inspect straps for wear, damage, and completeness.
 - Check wear and function belt.
 - Check backplate and cylinder holder for damage.
3. Cylinder and high pressure hose assembly:
 - Check cylinder to assure that it is firmly attached to backplate.
 - Open cylinder valve; listen or feel for leakage around packing and hose connection.
 - Check high pressure hose for damage or leaks.
4. Check Regulator in accordance with manufacturer's instructions.
5. Face-piece and corrugated breathing hose:
 - Inspect for damage, serrations, and deteriorated rubber.
 - Inspect lens for damage and proper seal in face-piece.
 - Inspect exhalation valve for damage and dirt build-up.
 - Stretch breathing hose and carefully inspect for holes and deterioration.
 - Inspect connector for damage and presence of washer.
 - Perform negative pressure test with face-piece donned.





6. Prior to storage of SCBA follow all of manufacturer's instructions for storage and refill cylinder to full charge.

6.10 Procedures for Use of Personal Protective Clothing

Chemical Protective Clothing:

Determine that the clothing material is correct for the specified task at hand.

- Visually inspect for:
 - imperfect seams
 - non-uniform coatings
 - tears
 - malfunctioning
 - For Level A Clothing check for pinholes.

Flex products:

- observe for cracks
- observe for other signs of self-deterioration.

If the product has been used previously, inspect inside and out for signs of chemical attack:

- discoloration
- swelling
- stiffness

During the work task, periodically inspect for:

- Evidence of chemical attack such as discoloration, swelling, stiffening, and softening. Keep in mind, however, that chemical permeation can occur without any visible effects.
- Failure of items that require good seal.
- Tears
- Punctures
- Seam Discontinuities

Gloves:

Before use, visually inspect for:

- imperfect seams
- tears, abrasions
- non-uniform coating
- if possible, pressurize glove with air; listen for pin-hole leaks.

7.0 MEDICAL SURVEILLANCE REQUIREMENTS

This medical monitoring program is designed to track the physical condition of employees on a regular basis as well as survey pre-employment or baseline conditions prior to potential exposures from removal operations at the site.



7.1 Baseline Monitoring

Prior to being assigned to the site for removal operations, every employee must receive a pre-assignment or baseline physical. The contents of the physical are to be determined by the medical consultant, an occupational physician, retained to provide medical expertise for the removal operation. Per the NIOSH/OSHA/USCG/EPA's Occupational Safety & Health Guidance Manual for Hazardous Waste Site Activities, the minimum medical monitoring requirements for work at the Site area as follows:

- Complete medical and work histories.
- Physical examination.
- Pulmonary function tests (FVC and FEV1).
- EKG.
- Eye examination and visual acuity.
- Urinalysis.
- Blood chemistry, including hematology, serum analysis, and heavy metals toxicology.

The pre-assignment physical should categorize employees as fit-for-duty and able to wear respiratory protection.

7.2 Periodic Monitoring

In addition to a baseline physical, all employees require a periodic physical within the last 12 months unless the physician believes a shorter interval is appropriate. The employer's medical consultant should prescribe an adequate medical that fulfills OSHA 29 1910.120 requirements. The pre-assignment medical outlined above may be applicable.

7.3 Exposure/Injury/Medical Support

As a follow-up to an injury or possible exposure above established exposure limits, all employees are entitled to and encouraged to seek medical attention and physical testing. Depending upon the type of exposure, it is critical to perform follow-up testing within 24-48 hours. It will be up to the employer's medical consultant to advise the type of test required to accurately monitor for exposure effects.

7.4 Exit Physical

At termination of employment or reassignment to an activity or location that does not represent a risk of exposure to hazardous exposures, an employee shall require an exit physical. If his/her last physical was within the last 6 months, the advising medical consultant has the right to determine adequacy and necessity of exit exam.

8.0 SITE CONTROL MEASURES

The following section defines measures and procedures for maintaining site control. Site control is an essential component in the implementation of the site health and safety program.





8.1 Buddy System

During all activities implementation of a buddy system is mandatory. A buddy system requires at least two people who work as a team; each looking out for each other. For example, Level B operations generally require three people. All tasks to be performed during removal of waste at the site shall utilize the buddy system.

8.2 Site Communications Plan

Successful communications between field teams and contact with personnel in the support roles is essential. The following communications systems will be available during activities at the site.

- Hand Signals
- Telephone

<u>Signal</u>	<u>Definition</u>
Hands clutching throat	Out of air/cannot breath
Hands on top of head	Need assistance
Thumbs up	Ok/I am alright/I understand
Thumbs down	No/negative
Arms waving upright	Send backup support
Grip partners wrist	Exit area immediately

8.3 Nearest Medical Assistance

Medical assistance may be summoned by calling:

SEE ATTACHMENT 1

8.4 Safe Work Practices and Standing Orders

- No smoking, eating, or drinking in exclusion (hot) zone.
- No horseplay.
- Implement the communications system.
- Line of sight must be in position.
- Wear the appropriate level of protection as defined in the HASP.
- All personnel shall remove all contaminated protective equipment before leaving the contamination reduction zone.
- Personnel must thoroughly wash hands and arms before eating, drinking, smoking, or using the restroom.
- All personnel shall know the location of emergency eye wash equipment, fire extinguishers, emergency signaling devices (horns), and supervisory personnel who can provide first aid and additional safety equipment.
- Personnel should be familiar with and adhere to any client imposed safety requirements.



9.0 EMERGENCY RESPONSE/CONTINGENCY PLAN

This section describes contingencies and emergency planning procedures to be implemented at the each site. This plan is compatible with all Federal and most state and local disaster and emergency management plans.

9.1 Pre-Emergency Planning

All employees shall be trained and reminded of provisions of the emergency response plan, communication systems, and evacuation routes. The plan will be reviewed and revised if necessary, on a regular basis. This will ensure that the plan is adequate and consistent with prevailing site conditions.

9.2 Personnel Roles and Lines of Authority

The Project Manager has primary responsibility for responding to and correcting emergency situations. This includes taking appropriate measure to ensure the safety of site personnel and the public. Possible actions may involve evacuation of personnel from the site area. He/she is additionally responsible for ensuring that corrective measures have been implemented, appropriate authorities notified, and follow-up reports completed.

9.3 Emergency Alarm Procedures

In case of emergency, air horns will be located in the exclusion zone. All site personnel should immediately proceed through the contamination reduction zone to the pre-specified rally point.

9.4 Evacuation Routes/Procedures

In the event of an emergency that necessitates an evacuation of the site, the following alarm procedures will be implemented:

1. The worker first detecting the emergency condition will notify his or her immediate supervisor or sound the air horn.
2. The immediate supervisor will notify the Project Manager or client representative.
3. The Project Manager shall have authority to order an evacuation of part of the site or the entire site in consultation with client representative.
4. At the same time, the appropriate public emergency organization (e.g. Fire Department, Ambulance, etc. as listed in Attachment 1) should be notified as warranted. Notification shall be given to the appropriate government agency upon concurrence of client.

Upon notice of evacuation, all personnel will be expected to proceed via the contamination reduction zone to the closest exit with your buddy, and mobilize to the safe distance area associate with the evacuation route. Personnel will remain in that area until Re-entry is authorized or an authorized individual provides further instructions. Safe distances in the event of a major incident involving the release of a volatile toxic chemical shall be at least 100 yards upwind from the point of release. The Project Manager shall exercise professional judgment at the site during the time of the release to extend the distance if necessary.

The authority to order a public evacuation beyond the boundary of the site shall rest with the appropriate representatives of the governmental agencies.



9.5 Emergency Contact/Notification System

The following list provides names and telephone numbers for emergency contact personnel. In the event of a medical emergency, appropriate emergency organization. In the event of a fire or spill, the site supervisor will notify the appropriate local, state, and federal agencies as listed in Attachment 1.

Table 10.2 Public Emergency Organizations

See Attachment 1

9.6 Emergency Medical Treatment Procedures

Any person who becomes ill or injured in the exclusion zone must be decontaminated to the maximum extent possible. If the injury or illness is minor, full decontamination should be completed and first aid administered prior to transport. If the patient's condition is serious, at least partial decontamination should be completed (i.e., complete disrobing of the victim and redressing in clean overalls or wrapping in a blanket.) First aid should be administered while awaiting an ambulance or paramedics. All injuries and illnesses must immediately be reported to the Project Manager.

Any person being transported to a clinic or hospital for treatment should take with them information on the chemical(s) they have been exposed to at the site (i.e. MSDS, waste profile, etc.).

Any vehicle used to transport contaminated personnel will be decontaminated as necessary.

9.6.1 Nearest Medical Facility

Identification to, phone number of and direction to medical clinics or hospitals located closest to the project site are included as Attachment 2.

9.7 Fire or Explosion

In the event of a fire or explosion, the local fire department should be summoned immediately. Upon their arrival, the Project Manager or client representative will advise the fire commander of the location, nature, and identification of the hazardous materials on-site.

If it is safe to do so, site personnel may:

- Use firefighting equipment available on-site to control or extinguish the fire
- Remove or isolate flammable or other hazardous materials which may contribute to the fire.

9.8 Spill or Leaks

In the event of a spill or a leak, site personnel will:



- Inform their supervisor immediately
- Identify the material
- Locate the source of the spillage and stop the flow if it can be done safely
- Immediately initiate containment and recovery

9.9 Emergency Equipment/Facilities

The following emergency equipment shall be maintained on all project sites for all personnel to use:

- First Aid Kit
- Cellular Telephone
- Eye Wash
- Drums and overpacks
- Oil dry
- Absorbent pads
- Shovels and brooms

10.0 MINOR SPILL CONTAINMENT PROGRAM

Minor spills and releases (leaking bottles, drums, etc.) will be managed by designated personnel with coordination through the Project Manager. All absorbent material applied to contain and/or remedy the release will be swept and deposited into a drum for disposal at an appropriate facility. Designated personnel will handle all minor releases (leaking bottles, etc.) with coordination through the Project Manager. All absorbent material applied to contain and/or remedy the release will be swept and deposited into a drum for disposal at an appropriate facility. If possible, the leaking container may be moved to a more secure location for response. The procedures defined in this section comprise the spill containment program in place for activities at the site.

- All drums and containers used during the operations shall meet the appropriate DOT requirements for the waste that they will contain.
- Drums and containers shall be inspected and their integrity assured prior to being moved.
- Drums or containers that cannot be inspected before being moved because of storage conditions, shall be positioned in an accessible location and inspected prior to further handling using mechanical assistance as necessary.
- Employees involved in the drum or container operations shall be warned of the hazards associated with the containers.
- Where spills, leaks, or ruptures may occur, adequate quantities of spill containment equipment (absorbent pads, oil dry, etc.) will be stationed in the immediate area.
- Drums or containers that cannot be moved without failure, shall be emptied into a sound container by pumping, pouring or aspirating.
- Fire extinguishing equipment meeting 29 CFR part 1910. Subpart 1 shall be on hand and ready for use to control fires.



ATTACHMENT 1

Emergency Phone Numbers

In the event of a chemical spill, fire or explosion, the following agencies may be notified by mobile phone and will receive a written incident report as required by regulations.

EEI MANAGEMENT CONTACTS

Dan McCabe, President (513) 266-3800

NATIONAL HOTLINES

Office of Emergency Services	(800) 852-7550
National Response Center	(800) 424-8802
National Response EPA	(800) 223-0425
Poison Control Center	(800) 222-1222
Pesticide Hotline	(800) 858-7378
DOT HAZMAT Hotline	(800) 467-4922
RCRA Hotline	(800) 424-9346
CHEMTREC	(800) 424-9300
Ecology Spill Response Hotline (24 hr):	(509) 575-2490
Hazardous Materials Information Center	(202) 366-4488

EMERGENCY 911

STATE NUMBERS – TBD

LOCAL POLICE AND FIRE NUMBERS - TBD



ATTACHMENT 2

Maps to Emergency Medical Clinic and/or Hospital

Insert Name, Address, Phone Number and Directions to the emergency medical clinic or hospital nearest to the project site

HASP Acknowledgment

By signing below, you affirm that the contents of this plan have been reviewed and that you understand and will comply with the requirements of this plan. Additionally, I affirm that I have received training commensurate with my responsibilities

Site H & S Officer: _____ Date: _____

Organization:

[illegible]



SUPPLEMENTAL TRAINING FOR HOUSEHOLD HAZARDOUS WASTE COLLECTIONS

I. Items to be Considered

1. Types of materials to be collected (*discuss and provide examples for the following*)
 - a. Flammables
 - b. Oxidizers
 - c. Corrosives
 - d. Corrosive Base/Acid
 - e. PCB's
 - f. Materials Containing Mercury (Bulk)
 - Fluorescent Bulbs
 - Elemental Mercury
 - g. Batteries Containing Mercury
 - h. Lead Acid Batteries
 - i. Other Batteries
 - j. Asbestos
 - k. Propane Cylinders
 - l. Other Cylinders
 - m. Medicines
 - n. Aerosol Cans
 - o. Pesticide Solids
 - p. Pesticide Liquids
 - q. Paint – Quart, Pint, Gallon and 5-Gallon Containers
 - r. Smoke Detectors
2. Oil Processing
3. Bulking Solvents
4. Anti-freeze Processing

II. Development of the General Health & Safety Program (HASP)

1. Fire Protection

III. Review of General Layout

1. Lanes
2. Sorting Tables
3. Material Flow

IV. Review of Profiles Assigned for 2014 HHW Collections by Category

1. Oxidizer
2. Lab Pack



3. Flammable Lab Pack
4. Corrosive Lab Pack
5. Bulk
6. Etc.

Note: One profile will be extended to one class for the entire season.

V. Review of Shipping Documents

VI. Review of Weighing Procedures

VII. Review of the Loading Practices

VIII. Review of Acceptable Personnel Conduct On and Off Job Site for EEI Employees and Volunteers

IX. Spill Clean-Up Procedures

1. Vehicle
2. On the Ground
3. Storm Water Protection
4. Sewer Blockages

X. Personal Protective Equipment (PPE)

1. Uniforms
2. Type of Clothing
3. Protective Creams
4. Safety Glasses
5. Hot and Cold Conditions
6. Sunscreens

XI. Typical Supplies List for HHW Event

XII. Typical Report to the Solid Waste Management District

Hazardous Collection Event 2017
Hazardous Waste Collection Proposal
Part III: Pricing

Price per category should include all handling, packaging, transportation, and disposal costs

1	Method of Disposal	Bid Quantity	Price per Pound
		500 lbs	\$ 2.95
	Lab Pack Reactives		
	cyanides	water-reactives	

2	Method of Disposal	Bid Quantity	Price per Pound
		3,000 lbs	\$ 1.00
	Non-Reactive Lab Packs (treatment/incinerate)		

3	Method of Disposal	Bid Quantity	Price per Pound
		0 lbs	\$ 1.00
	Un Pack/De Pack Lab Packs		

4	Method of Disposal	Bid Quantity	Price per Pound
		0 lbs	\$ 1.00
	Non-Hazardous Materials Lab Packs		

5	Method of Disposal	Bid Quantity	Price per Pound
		100 lbs	\$ 27.00* See Attachment A
	Mercury		
	mercury	mercury compounds	mercury pesticides

6	Method of Disposal	Bid Quantity	Price per Pound
		0 lbs	\$ 10.00
	Dioxin		

Attachment A

Pricing Item #5: Mercury

Liquid Mercury is priced at \$27.00 per pound due to changes in US Regulations directed towards the shipment of Liquid Mercury being shipped outside the borders of the continental United States.

This pricing however does not affect Mercury Compounds and Mercury Pesticides which remain classified as Toxic Lab Packs and Pesticides Liquids and Solids which remain at normal HHW prices of \$1.05 per pound and follow the same packaging requirements which allow them to be packaged as like materials for Toxics (Mercury Compounds) and Pesticides (Pesticide Liquids or Solids).

7	Method of Disposal	Bid Quantity	Price per Pound
		2,000 lbs	\$ 0.12
	Antifreeze		
	antifreeze		

8	Method of Disposal	Bid Quantity	Price per Pound
		10,000 lbs	\$ 0.12
	Used Oil (no motor oil and filters)		
	oil & transmission additives	transmission fluid	linseed oil
	cutting oils		

9	Method of Disposal	Bid Quantity	Price per Pound
		0 lbs	\$ 1.00
	Flammable Solvents - Liquid (55 gallon drum)		
	engine cleaners	paint thinners	turpentine
	mineral spirits	waste windshield cleaning fluid	fuel oil
	gasoline, old	gas & diesel additives	diesel fuel
	solvents	nail polish or remover	kerosene
	wood sealers	engine degreasers	paint removers
	brush cleaner	paint strippers	furniture stain remover
	degreasers	alcohols	

10	Method of Disposal	Bid Quantity	Price per Pound
		10,000 lbs	\$ 0.16
	Flammable Solvents - Liquid (bulk)		

11	Method of Disposal	Bid Quantity	Price per Pound
		10,000 lbs	\$ 0.60
	Flammables - Non-Processable, Small Containers		
	correction fluid	contact cement	fiberglass epoxy
	floor adhesive	rubber adhesives	adhesives
	roofing tar	tile adhesives	glue ink
	dyes	furniture strippers	preservatives

12	Method of Disposal	Bid Quantity	Price per Pound
		40,000 lbs	\$ 0.20
	Oil-Based Paint Related Material (Processable 1 and 5 gallon containers)		
	auto paint	lead paint	varnishes
	primer paint	oil based paints	metal primer
	polyurethane coatings	furniture polish	metal polishes
	wood preservatives	metal polishes	

13	Method of Disposal	Bid Quantity	Price per Pound
		15,000 lbs	\$ 0.20
	Oil-Based Paint Related Material (Non-Processable pints & quarts)		
	auto paint	lead paint	varnishes
	primer paint	oil based paints	metal primer
	polyurethane coatings	furniture polish	metal polishes
	wood preservatives	metal polishes	

14	Method of Disposal	Bid Quantity	Price per Pound
		0 lbs	Liquid \$ 1.05
		0 lbs	Solid \$ 3.00
	Oxidizers and Swimming Pool Chemicals		

15	Method of Disposal	Bid Quantity	Price per Pound
		2,000 lbs	Liquid \$ 1.00
		0 lbs	Solid \$ 1.00
	Corrosives - Acids		
	acids	photographic chemicals	metal cleaners
	swimming pool cleaner	toilet and drain cleaners	glass etching
	degreasers	detergents	wood preservatives
	rust removers	spray cleaners	tile cleaners
	disinfectants	spot or stain removers	Miscellaneous

Method of Disposal	Bid Quantity	Price per Pound
	2,000 lbs	Liquid \$ 1.00
	0 lbs	Solid \$ 1.00
Corrosives - Bases		
bases	photographic chemicals	bleach
oven cleaner	drain cleaners	glass cleaners
spray cleaners	spot or stain removers	ammonia
lime & slaked lime	pool chlorinators	Miscellaneous

Method of Disposal	Bid Quantity	Price per Pound
	15,000 lbs	\$ 0.45
Waxes, Joint Compounds, Latex Adhesives		
floor waxes	caulking	carpet cleaner
spackling (drywall compound)	liquid shoe polish	auto wax
upholstery cleaner	auto wax	

Method of Disposal	Bid Quantity	Price per Pound
	20,000 lbs	\$ 1.05
FIFRA - Fertilizers, Pesticides, Herbicides, Poisons		
algacides	fungicides	pet flea & tick products
bug spray/sticks	herbicides	rodenticides
creosote	insecticides (ant & roach powder)	weed killers
fertilizers containing nitrogen	insecticides (garden dusts & sprays)	plant food

Method of Disposal	Bid Quantity	Price per Pound
	5,000 lbs	\$ 0.85
Aerosol Cans Non-Foaming, Non-Iso-cyanate		
Spray paint	Pesticide Aerosols	

Method of Disposal	Bid Quantity	Price per Each
	0 lbs	\$ 10.00
Fire Extingisher - Household		

21	Method of Disposal	Bid Quantity	Price per Each
	grill size tanks (large)	25	\$ 12.00
	camp size tanks (small)	400	\$ 3.00
Grill Propane Tanks or cylinders (only)			

22	Method of Disposal	Bid Quantity	Price per Linear Foot
	Fluorescent bulbs	5,000 feet	\$ 0.21

23	Method of Disposal	Bid Quantity	Price per Bulb
		0 lbs	\$ 0.45
	Compact Fluorescent Lightbulbs		

24	Method of Disposal	Bid Quantity	Price per Pound
		10 lbs	\$ 1.65
	PCB Ballast		

25	Method of Disposal	Bid Quantity	Price /Credit per Pound	*
		0 lbs	\$ 0.12	
	Motor Oil and filters			
motor oil		oil filters		

16	Method of Disposal	Bid Quantity	Price per Pound	*
		0 lbs	\$ 0.20	
	Latex/Water based paint (Processable 1 and 5 gallon containers)			

27	Method of Disposal	Bid Quantity	Price per Pound	*
		0 lbs	\$ 0.20	
	Latex/Water based paint (Non-processable pints and quarts)			

28	Method of Disposal	Bid Quantity	Price/Credit per Battery	*
		0 lbs	\$ 0.05	

Batteries (auto, boat)

* To be invoiced separately

29 TOTAL DISPOSAL COST BASED ON BID QUANTITY: \$ 65,781.50

Other Costs

30 **Total Set Up & Mobilization/Demobilization Cost** \$ 13,000.00

(On an attached sheet, please provide a detailed list of items and charges)

31 **Total Miscellaneous Charges** \$ 0.00

(Please provide a separate sheet with a detailed list of any other items and charges.)

32 **Labor** (Enter estimated total at end of table here) \$ Included in set-up fee

(Please submit a list of persons and their job title who will be working on-site during this collection day with the charge per hour for each person. On a separate sheet - Please provide a detailed list of those same persons with their relevant experience, qualifications and a specific list of duties to be performed on the day.)

	Employee Name	Position	Estimated Hours	Charge per Hour	Estimated Total
				\$	\$
a.	Brian DePeel	Director, Lab Pack Services Division	40	\$ 0.00	\$ 0.00
b.	Dan McCabe	President / CEO	15	\$ 0.00	\$ 0.00
c.	Tom McCabe	Tech Sales Rep for HHW Operations	15	\$ 0.00	\$ 0.00
d.	Gary Davis	Corporate EH&S	15	\$ 0.00	\$ 0.00
e.	Gerry Ioannides	Corporate Officer	15	\$ 0.00	\$ 0.00
f.	Brad Boyer	Manager-Field Service Group	15	\$ 0.00	\$ 0.00
g.	Sheri Ruberg	Administrative Assistant	30	\$ 0.00	\$ 0.00
h.	Jeff Tucker	Assistant Director, Lab Pack Services Division	12	\$ 0.00	\$ 0.00
i.	+41 Various Employees from Attachment B	Field Technicians / Chemists / Laborers	15	\$ 0.00	\$ 0.00
j.				\$	\$

ATTACHMENT B

1 OF 8

PLANT TRAINING SUMMARY

8/4/2014

	A	B	C	D	E	F	G	H	I	J	K	L
1		40 HR	24 HR	BBP	HAZ COM	CONTIN	PB,AS,CD	MED MON	DOT	PPE	NFPA	RESP
2	ACUFF, JAMES	Y		Y	Y	Y	Y	Y	Y	Y	Y	
3	ALEXANDER, BRIAN	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
4	ARTER, JARED	Y		Y	Y	Y	Y	Y		Y	Y	Y
5	ANDRES,, JUAN	Y	Y	Y	Y	Y	Y	Y	X	Y	Y	Y
6	ARMSTRONG, SHIANEQUAN	Y		Y	Y	Y	Y	Y		Y	Y	Y
7	AUSTIN, BRANDON	Y		Y	Y	Y	Y	Y	X	Y	Y	Y
8	BARNES, BRENNAN	Y		Y	Y	Y	Y	Y		Y	Y	Y
9	BARNES, CALEB	Y	Y	Y	Y	Y	Y	Y		Y	Y	Y
10	BARNES, DUSTIN	Y		Y	Y	Y	Y	Y		Y	Y	Y
11	BAYER, MARGOT	Y		Y	Y	Y	Y	Y	Y	Y	Y	
12	BEAUPRE, JONATHIN	Y		Y	Y	Y	Y	Y		Y	Y	Y
13	BEAUPRE, PAUL	Y		Y	Y	Y	Y	Y		Y	Y	Y
14	BECKNELL, CHRIS	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
15	BRONNER, ERIC	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
16	BRONNER, TREY	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
17	BROSSART,ART	Y		Y	Y	Y		Y	Y	Y	Y	Y
18	BROWN, JEROME	Y		Y	Y	Y	Y	Y	X	Y	Y	Y
19	BRUNNER, GARY	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
20	BURKE, JEROME	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
21	CAMPBELL, DALE	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
22	CARR, ROSALINE		4						Y	X	X	X
23	CARSON, KIEFER	Y		Y	Y	Y	Y	Y	X	Y	Y	Y
24	CHAPMAN, SEAN	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
25	COMBS, JOE	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
26	CREEKMORE, JOSH	Y		Y	Y	Y	Y	Y		Y	Y	Y
27	DAVIS, MICHAEL	Y		Y	Y	Y	Y	Y	X	Y	Y	Y
28	DAVIS, GARY	Y		Y	Y	Y	Y	Y		Y	Y	Y
29	DAVIS, EMILY	Y	Y	Y	Y	Y	Y	Y	X	Y	Y	Y
30	DAVIS, MICHAEL, JR	Y	Y	Y	Y	Y	Y	Y	X	Y	Y	Y
31	DAVIS, TIM	Y		Y	Y	Y	Y	Y	X	Y	Y	Y
32	DEPEEL, BRIAN	Y		Y	Y	Y	Y	Y		Y	Y	
33												
34		40 HR	24 HR	BBP	HAZ COM	CONTIN	PB,AS,CD	MED MON	DOT	PPE	NFPA	RESP

PLANT TRAINING SUMMARY

8/4/2014

	A	B	C	D	E	F	G	H	I	J	K	L
35	DIETZ, JOHN	Y		Y	Y	Y	Y	Y		Y	Y	Y
36	DIETZ, KEN	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
37	DUFFENS, KYLE	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
38	DUNN, MICHAEL	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
39	ECKERT, MARY ANN		Y	Y	Y	Y	Y	Y	Y	X	X	X
40	ESTEBAN, MARCOS	Y			Y	Y	Y	Y	Y	Y	Y	Y
41	ESTEP, MATT	8		Y	Y	Y	Y	Y		Y	Y	Y
42	EVANS, KEVIN	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
43	EWING, ALISHA	Y	Y	Y	Y	Y	Y	Y	X	Y	Y	Y
44	FESCO, ROBERT		Y	Y	Y	Y	Y	Y	Y	Y	Y	
45	FRANCISCO, ANA	Y		Y	Y	Y	Y	Y	X	Y	Y	Y
46	FRANCISCO, FRANCISCO	Y		Y	Y	Y	Y	Y	X	Y	Y	
47	FREEMAN, BENJAMIN	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
48	GIBSON, TERRY	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
49	GIMENEZ, RAMON	Y			Y	Y	Y	Y	Y	Y	Y	Y
50	GORDON, WILLIAM	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
51	GREEN, SHENEQUA	Y	Y	Y	Y	Y	Y	Y	X	Y	Y	Y
52	HARRIS, CAVONTE	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
53	HARRIS, LAVON	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
54	HARRIS, CHAVONDA	Y		Y	Y	Y	Y	Y	X	Y	Y	Y
55	HARRIS, RICHARD	Y		Y	Y	Y	Y	Y	X	Y	Y	Y
56	HAWKINS, LARRY	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
57	HELMERS, RICK	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
58	HEMMERLE, DAN	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
59	HERRIN, KEITH	Y		Y	Y	Y	Y	Y	X	Y	Y	Y
60	HINES, KELLY	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
61	HIPP, JESSICA	Y		Y	Y	Y	Y	Y	X	Y	Y	Y
62	HOLBERT, TIM	Y		Y	Y	Y	Y	Y		Y	Y	
63	HOLBROOK, DWAYNE	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
64	HOLLOWAY, DAVID	Y		Y	Y	Y	Y	Y		Y	Y	Y
65	HOPKINS, MICHAEL	Y		Y	Y	Y	Y	Y		Y	Y	Y
66												
67												
68		40 HR	24 HR	BBP	HAZ COM	CONTIN	PB,AS,CD	MED MON	DOT	PPE	NFPA	RESP

PLANT TRAINING SUMMARY

8/4/2014

	A	B	C	D	E	F	G	H	I	J	K	L
69	HORNBACK, SHARON		4			Y			Y	Y		Y
70	HORNBACK, ELISSA	Y	Y	Y	Y	Y	Y	Y	X	Y	Y	X
71	HUGHES, MATTHEW	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
72	HUGHES, DAVID	Y		Y	Y	Y	Y	Y		Y	Y	Y
73	JAMES, HAROLD	Y		Y	Y	Y	Y	Y	Y	Y	Y	
74	JAMES, MARTIN	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
75	JOERING, EUGENE											
76	JOERING, MELISSA							Y	Y			X
77	JORDON, MELISSA		4	Y	Y	Y	Y	Y	X	Y	Y	Y
78	KAehler, MIKE	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
79	KATHMAN, BRANDON	Y		Y	Y	Y	Y	Y	Y	Y	Y	
80	LUCAS, LACINDA	Y		Y	Y	Y	Y	Y		Y	Y	Y
81	MARCOS, EULALIA		Y	Y	Y	Y		Y	X	X		X
82	MARCOS, JUAN ANTONIO	Y			Y		Y	Y	Y	Y	Y	Y
83	MARSH, BRIAN	Y		Y	Y	Y	Y	Y		Y	Y	Y
84	MCCABE, DAN	Y		Y		Y	Y		Y	Y	Y	Y
85	MCCABE, JOE	Y		Y	Y		Y	Y	Y	Y	Y	Y
86	MCCABE, THOMAS	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
87	MCCABE, JOEY	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
88	MCCABE, LINDSEY											
89	MCCABE, TOMMY	Y	Y	Y	Y	Y	Y	Y		Y	Y	Y
90	MCCOLLUM, TAYLOR	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
91	MCNAMEE, PATRICK	Y		Y			Y	Y	Y	X	Y	Y
92	MILLER, STEVIE		8	Y	Y	Y	Y	Y		Y	Y	X
93	MULLINS, ANTHONY	Y		Y	Y	Y	Y	Y	X	Y	Y	Y
94	PHOENIX, KEN	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
95	RIGGS, FRANK	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
96	ROBINSON, DOMINIC	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
97	RUBERG, CHERYL		Y	Y	Y	Y	Y	Y	Y	Y	Y	X
98	SEIBERT, COURTNEY	Y		Y	Y	Y	Y	Y	X	Y	Y	Y
99	SMITH, ROBERT	Y	Y	Y	Y	Y	Y	Y	X	Y	Y	Y
100												
101												
102		40 HR	24 HR	BBP	HAZ COM	CONTIN	PB,AS,CD	MED MON	DOT	PPE	NFPA	RESP

PLANT TRAINING SUMMARY

8/4/2014

[illegible]

k.			\$	\$
l.			\$	\$
m.			\$	\$
n.			\$	\$
o.			\$	\$
p.			\$	\$
q.			\$	\$
r.			\$	\$
s.			\$	\$
t.			\$	\$
u.			\$	\$
v.			\$	\$
w.			\$	\$
x.			\$	\$
y			\$	\$
z.			\$	\$
aa.			\$	\$
bb.			\$	\$
cc.			\$	\$

dd.			\$	\$
ee.			\$	\$
ff.			\$	\$
gg.			\$	\$
hh.			\$	\$
ii.			\$	\$
jj.			\$	\$
kk.			\$	\$
ll.			\$	\$
mm.			\$	\$
nn.			\$	\$
oo.			\$	\$
pp.			\$	\$
qq.			\$	\$
rr.			\$	\$
ss.			\$	\$
tt.	Total Estimated Labor Cost for HHW Collection Event			\$ 0.00

MAYOR JIM GRAY



LEXINGTON

TODD SLATIN
DIRECTOR
CENTRAL PURCHASING

ADDENDUM #3

RFP Number: #2-2017

Date: January 20 2017

Subject: Hazardous Household Waste Disposal Spring 2017

Address inquiries to:
Sondra Stone
(859) 258-3320

TO ALL PROSPECTIVE SUBMITTERS:

Please be advised of the following clarifications to the above referenced RFP:

RFP opening has been extended to February 2, 2017, 2:00 pm.

Todd Slatin, Director
Division of Central Purchasing

All other terms and conditions of the RFP and specifications are unchanged. This letter should be signed, attached to and become a part of your submittal.

COMPANY NAME: Environmental Enterprises, Inc.

ADDRESS: 4650 Spring Grove Avenue, Cincinnati, Ohio 45232

SIGNATURE OF BIDDER:  _____



MAYOR JIM GRAY



LEXINGTON

TODD SLATIN
DIRECTOR
CENTRAL PURCHASING

ADDENDUM #2

RFP Number: #2-2017

Date: January 18, 2017

Subject: Hazardous Household Waste Disposal Spring 2017

Address inquiries to:
Sondra Stone
(859) 258-3320

TO ALL PROSPECTIVE SUBMITTERS:

Please be advised of the following clarifications to the above referenced RFP:

Please find attached pricing from last year's HHW event.

Todd Slatin, Director
Division of Central Purchasing

All other terms and conditions of the RFP and specifications are unchanged. This letter should be signed, attached to and become a part of your submittal.

COMPANY NAME: Environmental Enterprises, Inc.

ADDRESS: 4650 Spring Grove Avenue, Cincinnati, Ohio 45232

SIGNATURE OF BIDDER:  _____



**Spring Clean Up 2016
Household Hazardous Waste Collection Proposal
Part III: Pricing**

Price per category should include all handling, packaging, transportation, and disposal costs

1	Method of Disposal	Price per Pound
	Treatment	\$ 3.00
	Lab Pack Reactives	
	cyanides	water-reactives

2	Method of Disposal	Price per Pound
		\$ 1.00
	Non-Reactive Lab Packs (treatment/incinerate)	

3	Method of Disposal	Price per Pound
		\$ 1.00
	Un Pack/De Pack Lab Packs	

4	Method of Disposal	Price per Pound
		\$1.00
	Non-Hazardous Materials Lab Packs	

5	Method of Disposal	Price per Pound
		\$ 30.00 * See Attachment A
	Mercury	
	mercury	mercury compounds mercury pesticides

6	Method of Disposal	Price per Pound
		\$15.00
	Dioxin	

Attachment A

Pricing Item #5: Mercury

Liquid Mercury is priced at \$30.00 per pound due to changes in US Regulations directed towards the shipment of Liquid Mercury being shipped outside the borders of the continental United States.

This pricing however does not affect Mercury Compounds and Mercury Pesticides which remain classified as Toxic Lab Packs and Pesticides Liquids and Solids which remain at normal HHW prices of \$1.05 per pound and follow the same packaging requirements which allow them to be packaged as like materials for Toxics (Mercury Compounds) and Pesticides (Pesticide Liquids or Solids).

7	Method of Disposal		Price per Pound
			\$ 0.16
	Antifreeze		
	antifreeze		

8	Method of Disposal		Price per Pound
			\$ 0.16
	Used Oil (no motor oil and filters)		
	oil & transmission additives	transmission fluid	linseed oil
	cutting oils		

9	Method of Disposal		Price per Pound
			\$1.00
	Flammable Solvents - Liquid (55 gallon drum)		
	engine cleaners	paint thinners	turpentine
	mineral spirits	waste windshield cleaning fluid	fuel oil
	gasoline, old	gas & diesel additives	diesel fuel
	solvents	nail polish or remover	kerosene
	wood sealers	engine degreasers	paint removers
	brush cleaner	paint strippers	furniture stain remover
	degreasers	alcohols	

10	Method of Disposal		Price per Pound
			\$ 0.16
	Flammable Solvents - Liquid (bulk)		

11	Method of Disposal		Price per Pound
			\$ 0.60
	Flammables - Non-Processable, Small Containers		
	correction fluid	contact cement	fiberglass epoxy
	floor adhesive	rubber adhesives	adhesives
	roofing tar	tile adhesives	glue ink
	dyes	furniture strippers	preservatives

12	Method of Disposal		Price per Pound
			\$ 0.21
	Oil-Based Paint Related Material (Processable 1 and 5 gallon containers)		
	auto paint	lead paint	varnishes
	primer paint	oil based paints	metal primer
	polyurethane coatings	furniture polish	metal polishes
	wood preservatives	metal polishes	

13	Method of Disposal		Price per Pound
			\$ 0.21
	Oil-Based Paint Related Material (Non-Processable pints & quarts)		
	auto paint	lead paint	varnishes
	primer paint	oil based paints	metal primer
	polyurethane coatings	furniture polish	metal polishes
	wood preservatives	metal polishes	

14	Method of Disposal		Price per Pound
			Liquid \$ 1.15
			Solid \$ 3.00
	Oxidizers and Swimming Pool Chemicals		

15	Method of Disposal		Price per Pound
			Liquid \$ 1.05
			Solid \$ 1.05
	Corrosives - Acids		
	acids	photographic chemicals	metal cleaners
	swimming pool cleaner	toilet and drain cleaners	glass etching
	degreasers	detergents	wood preservatives
	rust removers	spray cleaners	tile cleaners
	disinfectants	spot or stain removers	Miscellaneous

Method of Disposal		Price per Pound
16	Liquid \$ 1.05	
	Solid \$ 1.05	
	Corrosives - Bases	
bases	photographic chemicals	bleach
oven cleaner	drain cleaners	glass cleaners
spray cleaners	spot or stain removers	ammonia
lime & slaked lime	pool chlorinators	Miscellaneous

Method of Disposal		Price per Pound
		<u>\$ 0.45</u>
Waxes, Joint Compounds, Latex Adhesives		
floor waxes	caulking	carpet cleaner
spackling (drywall compound)	liquid shoe polish	auto wax
upholstery cleaner	auto wax	

Method of Disposal	Price per Pound
	<u>\$ 1.05</u>
FIFRA - Fertilizers, Pesticides, Herbicides, Poisons	
algacides	fungicides
bug spray/sticks	herbicides
creosote	insecticides (ant & roach powder)
fertilizers containing nitrogen	insecticides (garden dusts & sprays)
	pet flea & tick products
	rodenticides
	weed killers
	plant food

	Method of Disposal		Price per Pound
19			<u>\$ 0.95</u>
	Aerosol Cans Non-Foaming, Non-Iso-cyanate		
	Spray paint	Pesticide Aerosols	

	Method of Disposal	Price per Each
20		\$ 12.00
	Fire Extingusher - Household	

21	Method of Disposal		Price per Each
			\$ 12.00
	Grill Propane Tanks or cylinders (only)		
	grill size tanks (large)		\$12.00
	camp size tanks (small)		5.00

22	Method of Disposal		Price per Linear Foot
	Fluorescent bulbs		\$ 0.21

23	Method of Disposal	Recycle	Price per Bulb
			\$ 0.45
	Compact Fluorescent Lightbulbs		

24	Method of Disposal		Price per Pound
			\$ 1.65
	PCB Ballast		

25	Method of Disposal		Price /Credit per Pound
			\$ 0.16
	Motor Oil and filters		
	motor oil	oil filters	

16	Method of Disposal		Price per Pound
			\$ 0.21
	Latex/Water based paint (Processable 1 and 5 gallon containers)		

27	Method of Disposal		Price per Pound
			\$ 0.21
	Latex/Water based paint (Non-processable pints and quarts)		

28	Method of Disposal		Price/Credit per Battery
----	---------------------------	--	---------------------------------

	\$ 0.15
Batteries (auto, boat)	

* To be invoiced separately

29 **TOTAL DISPOSAL COST:** \$ 100,835.00

refer to RFP- for list of material and estimated quantities)

MAYOR JIM GRAY



LEXINGTON

TODD SLATIN
DIRECTOR
CENTRAL PURCHASING

ADDENDUM #1

RFP Number: #2-2017

Date: January 17, 2017

Subject: Hazardous Household Waste Disposal Spring 2017

Address inquiries to:
Sondra Stone
(859) 258-3320

TO ALL PROSPECTIVE SUBMITTERS:

Please be advised of the following clarifications to the above referenced RFP:

Please find attached invoices from last year's HHW event.

Todd Slatin, Director
Division of Central Purchasing

All other terms and conditions of the RFP and specifications are unchanged. This letter should be signed, attached to and become a part of your submittal.

COMPANY NAME: Environmental Enterprises, Inc.

ADDRESS: 4650 Spring Grove Avenue, Cincinnati, Ohio 45232

SIGNATURE OF BIDDER: 



Environmental Enterprises, Inc

10163 Cincinnati-Dayton Road
Cincinnati, OH 45241-1586

Voice: (513) 772-2818
Fax: (513) 782-8950

INVOICE

Invoice Number: 04-138313
Invoice Date: Apr 30, 2016
Page: 1

Remit to:
L-2760
Columbus, OH 43260-2760

Bill To:

LEXINGTON-FAYETTE URBAN COUNTY
GOVERNME
675 BYRD THURMAN DR
ATTN: ACCTS PAYABLE
LEXINGTON, KY 40510

Ship to:

LEXINGTON-FAYETTE URBAN COUNTY
GOVERNME
1631 OLD FRANKFORT PIKE
LEXINGTON, KY 40504

Customer ID	Customer PO	Payment Terms	
LEXI04	CONTRACT	Net 30 Days	
Sales Rep ID	Shipping Method	Ship Date	Due Date
LABPACK			5/30/16

Quantity	Item	Description	Unit Price	Amount
1.00	MSG	CITY DEPARTMENT DROP OFFS ON APRIL 23, 2016; MANIFEST NUMBER 014914374JJK, PAGE 1 OF 3		
4.00	PNTCN1/YD	PAINT YDBOX X105261	160.00	640.00
27.00	PROP2/YD	PROPANE CYLINDERS X105263	12.00	324.00
1.00	NHLF1/55	PUTTY & ADHESIVES, YDBOX X105267	329.00	329.00
8.00	LPMISC	FREON CYLINDERS YDBOX X105196	25.00	200.00
1.00	MSG	PAGE 2 OF 3		
3.00	LPMISC	CALIBRATION GASES (EMPTY) 55GAL X105273	25.00	75.00
1.00	SHRED1/20	AEROSOLS 20GAL X105198	200.00	200.00
33,600.00	HGBULB1	FLUORESCENT BULBS YDBOX X105269	0.11	3,696.00
700.00	HGBULB2/YD	MERCURY VAPOR BULBS SKID X105271	2.57	1,799.00
1.00	NHANT12/55	ANTIFREEZE 55GAL IN 85OVP X105265	75.00	75.00
1.00	LPINCIN/55	LABPACK/INCIN/55GAL X105259	245.00	245.00
1.00	LPINCIN/20	LABPACK/INCIN/20GAL X105259	245.00	245.00
1.00	LPINCIN/5	LABPACK/INCIN/5GAL X105259	245.00	245.00
1.00	LPCT1/5	LABPACK/TREAT-LEAD SOIL/5GAL X105194	400.00	400.00
1.00	LPCT1/55	LABPACK/TREAT/55GAL X105194	245.00	245.00
1.00	MSG	PAGE 3 OF 3		
7.00	LPCT1/55	LABPACK/TREAT/55GAL X105194	245.00	1,715.00
1.00	LPCT1/5	LABPACK/TREAT/5GAL X105194	125.00	125.00

Subtotal	Continued
Sales Tax	Continued
Total Invoice Amount	Continued
Payment/Credit Applied	
TOTAL	Continued

Check/Credit Memo No:

Environmental Enterprises, Inc10163 Cincinnati-Dayton Road
Cincinnati, OH 45241-1586

Voice: (513) 772-2818

Fax: (513) 782-8950

INVOICE

Invoice Number: 04-138313

Invoice Date: Apr 30, 2016

Page: 2

Remit to:**L-2760****Columbus, OH 43260-2760****Bill To:**LEXINGTON-FAYETTE URBAN COUNTY
GOVERNME
675 BYRD THURMAN DR
ATTN: ACCTS PAYABLE
LEXINGTON, KY 40510**Ship to:**LEXINGTON-FAYETTE URBAN COUNTY
GOVERNME
1631 OLD FRANKFORT PIKE
LEXINGTON, KY 40504

Customer ID	Customer PO	Payment Terms	
LEXI04	CONTRACT	Net 30 Days	
Sales Rep ID	Shipping Method	Ship Date	Due Date
LABPACK			5/30/16

Quantity	Item	Description	Unit Price	Amount
1.00	LPCT1/20	LABPACK/TREAT/20GAL X105194	200.00	200.00
2.00	LPCT1/55	LABPACK/TREAT/55GAL X105194	245.00	490.00
1.00	LPCT1/55	LABPACK/TREAT/55GAL X105194	245.00	245.00
1.00	LPCT1/5	LABPACK/TREAT/5GAL X105194	125.00	125.00
2.00	LPCT1/55	LABPACK/TREAT/55GAL X105194	245.00	490.00
1.00	LPCT1/55	LABPACK/TREAT/55GAL X105194	245.00	245.00
1.00	LPCT1/20	LABPACK/TREAT/20GAL X105194	200.00	200.00
Subtotal				12,553.00
Sales Tax				
Total Invoice Amount				12,553.00
Payment/Credit Applied				
TOTAL				12,553.00

Check/Credit Memo No:

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number EXEMPT	2. Page 1 of 3	3. Emergency Response Phone (800) 392-1503	4. Manifest Tracking Number 014914374 JJK	
5. Generator's Name and Mailing Address EEL - LFUGG 1631 Old Frankfort Pike Lexington, KY 40504			Generator's Site Address (if different than mailing address)			
Generator's Phone: (859) 367-4948						
6. Transporter 1 Company Name Midwest Environmental Transport, Inc.			U.S. EPA ID Number OH0000000539			
7. Transporter 2 Company Name			U.S. EPA ID Number			
8. Designated Facility Name and Site Address Environmental Enterprises, Inc. 4650 Spring Grove Avenue Cincinnati, OH 45232			U.S. EPA ID Number OHD083377010			
Facility's Phone: (513) 541-1823						
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		
	X	1. UN1263; Waste Paint; 3; PETI; (0001); RA 16-15140-43	004	CF	02400 P	0001
	X	2. UN1978; Waste Propane; 2.1; (0001) 15144-45	002	CF	00800 P	0001
	X	3. UN2811; Toxic Solid, Organic, N.O.S.; 6.1; PETI (Putty, Adhesives); (None) 15146	001	CF	00600 P	NONE
X	4. UN1956; Compressed Gases (Non-Flammable); N.O.S.; 2.2; (0001) 15147	001	CF	00400 P	NONE	
14. Special Handling Instructions and Additional Information 1. X105261 ERG#120 - 4x40 Box 2. X105263 ERG#115 - 2x40 Box with 27 cylinders 3. X105267 ERG#154 - 1x40 Box 4. X105196 ERG#126 - 1x40 Box EEL Work Order # 04-138813 Emergency Contact: Emergency Response Coordinator (800) 392-1503 and contact 911						
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/Offor's Printed/Typed Name Dann D. Dettman						
Signature <i>[Signature]</i>						
Month Day Year 4 23 16						
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____					
	Transporter signature (for exports only): _____					
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials					
	Transporter 1 Printed/Typed Name Kent Friedlander					
Signature <i>[Signature]</i>						
Month Day Year 4 23 16						
Transporter 2 Printed/Typed Name						
Signature						
Month Day Year						
DESIGNATED FACILITY	18. Discrepancy					
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> 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. H001		2. H050		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 Steve Campbell						
Signature <i>[Signature]</i>						
Month Day Year 4 28 16						

UNIFORM HAZARDOUS WASTE MANIFEST
(Continuation Sheet)21. Generator ID Number
EXEMPT22. Page
2 of 3

23. Manifest Tracking Number

014914374 UTK24. Generator's Name
**EET-LFUCG
1631 Old Frankfort Pike
Lexington, KY 40504**25. Transporter Company Name
MIDWEST Environmental Transport, Inc.

U.S. EPA ID Number

040000000539

26. Transporter Company Name

U.S. EPA ID Number

27a. HM 27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))

28. Containers

No.

Type

29. Total Quantity

30. Unit Wt./Vol.

31. Waste Codes

X ⁵	UN1956; COMPRESSED GAS, N.O.S.; 2.2; (Empty Calibration Gas) 16-15748-50	003	DF	00200	P	NONE
X ⁶	UN1950; Waste Aerosols, Flammable; 2.1; (0001) 15151	001	DF	00030	P	0001
X ⁷	UN3288; Toxic Solid, Inorganic, N.O.S.; 6.1; P01 (Fluorescent Bulbs); (Universal) 152-58	007	CW	03200	P	UNIVERSAL
X ⁸	UN3288; Toxic Solid, Inorganic, N.O.S.; 6.1; P01 (Mercury Vapor bulbs); (Universal) 15159-60	002	CW	00400	P	UNIVERSAL
X ⁹	NON-Regulated Antifreeze 15161	001	DM	00400	P	NONE
X ¹⁰	UN3021; Waste Pesticides, liquid, Flammable, toxic, N.O.S.; 3(6.1); P01 (0001) 15162	001	DF	00200	P	0001
X ¹¹	UN2903; Waste Pesticide, liquid, toxic, Flammable, N.O.S.; 6.1(3); P01 (0001) 15163	001	DF	00075	P	0001
X ¹²	UN2538; Pesticide, solid, toxic, N.O.S.; 6.1; P01 (Herbicide sticks) 15164	001	DF	00005	P	NONE
X ¹³	UN3077; Waste Toxic Solid, Inorganic, N.O.S.; 6.1; P01 (0008); (LEAD SOIL); RR 15165	001	DF	00010	P	0008
X ¹⁴	UN1993; Waste Flammable liquid, N.O.S.; 3; P01 (0001, 0002); RR 15166	001	DM	00200	P	0001 0002

32. Special Handling Instructions and Additional Information

5. X105213 ENCL 116-1X55, 1X20(216 CYS) 9. X105265-1X55 O.P. in 85 DM
 6. X105182#116-1X20 10. X105259#131-1X55 13. X105194#151-1X55
 7. X105269#151 with 8400X4 Bulbs 11. X105259#131-1X20 14. X105194#151-1X55
 8. X105271#151 with 700 bulbs 12. X105259#151-1X55 15. X105194#151-1X55

Emergency Contact:

(800) 392-1503

and contact 911

33. Transporter Acknowledgment of Receipt of Materials

Printed/Typed Name

Kent Friedlander

Signature

[Signature]

Month Day Year

4 23 16

34. Transporter Acknowledgment of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

H050**H141****H141****H141****H141****H141****H141**

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number EXEMPT	22. Page 3013	23. Manifest Tracking Number 014914374 JTK	
24. Generator's Name EEL - LFUCG 1831 Old Frankfort Pike Lexington, KY 40504					
25. Transporter <u>1</u> Company Name Midwest Environmental Transport Inc			U.S. EPA ID Number OH00000539		
26. Transporter _____ Company Name			U.S. EPA ID Number		
27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No. Type		29. Total Quantity	30. Unit Wt./Vol.
X 15	UN 1993; Waste Flammable liquid, n.o.s.; 3; PGII; (0001); RR	73	DF	01400	P
X 16	UN 3139; Waste Oxidizing liquid, n.o.s.; 5.1; PGII; (0001)	001	DF	00007	P
X 17	UN 1759; Waste Corrosive solid, n.o.s.; 8; PGII; (0002)	001	DF	00030	P
X 18	UN 1729; Waste Corrosive Alkali liquid, n.o.s.; 8; PGII; (0002); RR	002	DF	00400	P
X 19	UN 1760; Waste Corrosive liquid, n.o.s.; 8; PGII; (0002); RR	002	DF	00210	P
X 20	UN 2811; Toxic solid, organic, n.o.s.; 6.1; PGII; (Solids, caustic); (None)	002	DF	00400	P
X 21	UN 2810; Toxic liquid, organic, n.o.s.; 6.1; PGII; (Antifreeze, ethylene); (None)	002	DF	00300	P
22					
23					
24					
32. Special Handling Instructions and Additional Information 12. X105194 ERG #154-1X55, 1X5 16. X105194 ERG #154-1X55 17. X105194 ERG #154-1X20 18. X105194 ERG #154-2X55 19. X105194 ERG #154-1X55, 1X5 20. X105194 ERG #154-2X55 21. X105194 ERG #153-1X55, 1X20					
Emergency Contact: (800) 392-1503 and contact 911					
33. Transporter <u>1</u> Acknowledgment of Receipt of Materials					
Printed/Typed Name Heidi Fricolander		Signature [Signature]		Month 4	Day 23
34. Transporter _____ Acknowledgment of Receipt of Materials					
Printed/Typed Name		Signature		Month	Day
35. Discrepancy					
36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					
H061		H070		H121	
				H121	

Environmental Enterprises, Inc

10163 Cincinnati-Dayton Road
Cincinnati, OH 45241-1586

Voice: (513) 772-2818

Fax: (513) 782-8950

INVOICE

Invoice Number: 04-137873

Invoice Date: Apr 30, 2016

Page: 1

Remit to:

L-2760

Columbus, OH 43260-2760

Bill To:

LEXINGTON-FAYETTE URBAN COUNTY
GOVERNME
675 BYRD THURMAN DR
ATTN: ACCTS PAYABLE
LEXINGTON, KY 40510

Ship to:

LEXINGTON-FAYETTE URBAN COUNTY
GOVERNME
1631 OLD FRANKFORT PIKE
LEXINGTON, KY 40504

Customer ID	Customer PO	Payment Terms	
LEXI04	CONTRACT	Net 30 Days	
Sales Rep ID	Shipping Method	Ship Date	Due Date
LABPACK			5/30/16

Quantity	Item	Description	Unit Price	Amount
1.00	MSG	HHW COLLECTION HELD ON APRIL 23, 2016; MANIFEST NUMBER 014914370JJK, PAGE 1 OF 1		
1,601.00	NONHAZ6/300	OIL HHOIL	0.16	256.16
837.00	NONHAZ8/300	ANTIFREEZE HHANTI	0.16	133.92
2,518.00	FHB1/300	BULK FLAMMABLE SOLVENTS HHBFL	0.16	402.88
1.00	MSG	MANIFEST NUMBER 014914373JJK, PAGE 1 OF 1		
1,046.00	NONHAZ3/YAF	PUTTY AND ADHESIVES HHPUTY	0.60	627.60
755.00	HHW2/YD	HHW SOLID PESTICIDE LPK HHPSOL	1.05	792.75
31,179.00	HHW5/YDBOX	PAINT HHPNT	0.21	6,547.59
1,095.00	SHRED1/YARL	AEROSOLS HHAERO	0.95	1,040.25
1.00	MSG	MANIFEST NUMBER 014914372JJK, PAGE 1 OF 2		
36.00	HHW15	PROPANE(LARGE) HHPROP	12.00	432.00
2,271.00	HHW2/YD	HHW SOLID PESTICIDE LPK HHPSOL	1.05	2,384.55
29,323.00	HHW5/YDBOX	PAINT HHPNT	0.21	6,157.83
2,189.00	SHRED1/YARL	AEROSOLS HHAERO	0.95	2,079.55
1.00	MSG	PAGE 2 OF 2		
1,558.00	NONHAZ3/YAF	PUTTY AND ADHESIVES HHPUTY	0.60	934.80
1.00	MSG	MANIFEST NUMBER 014914364JJK, PAGE 1 OF 5		
60.00	HHW15	PROPANE(SMALL) HHPROP	5.00	300.00
24.00	HHW16	FIRE EXTINGUISHER HHFX	12.00	288.00
1.00	MSG	PAGE 2 OF 5		

Subtotal	Continued
Sales Tax	Continued
Total Invoice Amount	Continued
Payment/Credit Applied	
TOTAL	Continued

Check/Credit Memo No:

Environmental Enterprises, Inc

10163 Cincinnati-Dayton Road
Cincinnati, OH 45241-1586

Voice: (513) 772-2818

Fax: (513) 782-8950

INVOICE

Invoice Number: 04-137873

Invoice Date: Apr 30, 2016

Page: 2

Remit to:

L-2760

Columbus, OH 43260-2760

Bill To:

LEXINGTON-FAYETTE URBAN COUNTY
GOVERNME
675 BYRD THURMAN DR
ATTN: ACCTS PAYABLE
LEXINGTON, KY 40510

Ship to:

LEXINGTON-FAYETTE URBAN COUNTY
GOVERNME
1631 OLD FRANKFORT PIKE
LEXINGTON, KY 40504

Customer ID	Customer PO	Payment Terms	
LEXI04	CONTRACT	Net 30 Days	
Sales Rep ID	Shipping Method	Ship Date	Due Date
LABPACK			5/30/16

Quantity	Item	Description	Unit Price	Amount
2,924.00	HHW6/55	HHW FLAMMABLE LIQUID LPK HHFLLP	1.00	2,924.00
2,476.00	FHB1/300	BULK FLAMMABLE SOLVENTS HHBFL	0.16	396.16
79.00	HHW12/55	HHW ALUMINUM PAINT HHALUM	3.00	237.00
2,821.00	HHW1/55	HHW LIQUID PESTICIDE LPK HHPLIQ	1.05	2,962.05
209.00	HHW10/55	HHW OXIDIZER LIQUID HHOXLPL	1.15	240.35
82.00	HHW10/55	HHW OXIDIZER SOLID HHOXLPS	3.00	246.00
1.00	MSG	PAGE 3 OF 5		
1.00	HHW11/55	HHW ISOCYANATES HHISO	525.00	525.00
568.00	HHW8/55	HHW CORROSIVE LPK ALKALINE HHALLP	1.05	596.40
567.00	HHW8/55	HHW CORROSIVE LPK ACID HHACLP	1.05	595.35
1.00	MSG	PAGE 4 OF 5		
1,670.00	HHW13/55	CLEANERS HHCLNR	1.00	1,670.00
2,837.00	NONHAZ6/300	OIL HHOIL	0.16	453.92
49.00	HGBULB1	COMPACT FLUORESCENT BULBS HHFLOR	0.45	22.05
1,143.00	NONHAZ8/55	ANTIFREEZE HHANTI	0.16	182.88
1,218.00	NONHAZ3/YAF	PUTTY AND ADHESIVES HHPUTY	0.60	730.80
1,881.00	NONHAZ3/55	PUTTY AND ADHESIVES HHPUTY	0.60	1,128.60
165.00	NONHAZ3/55	HOUSEHOLD BATTERIES HHBAT	1.20	198.00
1.00	MSG	PAGE 5 OF 5		
8,664.00	HHW5/YDBOX	PAINT HHPNT	0.21	1,819.44
3.00	MTDM/55	EMPTY DRUMS HHMT	20.00	60.00

Check/Credit Memo No:

Subtotal	Continued
Sales Tax	Continued
Total Invoice Amount	Continued
Payment/Credit Applied	
TOTAL	Continued

Environmental Enterprises, Inc

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Cincinnati, OH 45241-1586

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INVOICE

Invoice Number: 04-137873
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LEXINGTON-FAYETTE URBAN COUNTY
GOVERNME
1631 OLD FRANKFORT PIKE
LEXINGTON, KY 40504

Customer ID	Customer PO	Payment Terms	
LEXI04	CONTRACT	Net 30 Days	
Sales Rep ID	Shipping Method	Ship Date	Due Date
LABPACK			5/30/16

Quantity	Item	Description	Unit Price	Amount
1.00	MSG	MANIFEST NUMBER 014914365JJK, PAGE 1 OF 5		
162.00	HHW15	PROPANE(SMALL) HHPROP	5.00	810.00
12.00	HHW15	PROPANE(LARGE) HHPROP	12.00	144.00
1.00	HHW15	PROPANE(100#) HHPROP	100.00	100.00
51.00	HHW16	FIRE EXTINGUISHER HHFX	12.00	612.00
7.00	LPMISC	FREON CYLINDERS HHFREON	25.00	175.00
1.00	LPMISC	OXYGEN CYLINDERS HHOXYGEN	15.00	15.00
1.00	MSG	PAGE 2 OF 5		
13.00	LPMISC	HELIUM CYLINDERS HHHELIUM	15.00	195.00
1,028.00	HHW6/55	HHW FLAMMABLE LIQUID LPK HHFLLP	1.00	1,028.00
70.00	FHB1/300	BULK FLAMMABLE SOLVENTS HHBFL	0.16	11.20
633.00	HHW12/YDBO	HHW ALUMINUM PAINT HHALUM	3.00	1,899.00
5.00	HHW6/5	HHW FLAMMABLE LIQUID (LIGHTERS) HHLITR	1.00	5.00
726.00	HHW1/55	HHW LIQUID PESTICIDE LPK HHPLIQ	1.05	762.30
89.00	HHW7/20	HHW FLAMMABLE SOLID & REACTIVE HHFSLP	3.00	267.00
223.00	HHW10/55	HHW OXIDIZER LIQUID HHOXLPL	1.15	256.45
155.00	HHW10/55	HHW OXIDIZER SOLID HHOXLPS	3.00	465.00
1.00	MSG	PAGE 3 OF 5		
4.00	HHW7/5	ORGANIC PEROXIDE HHOPER	3.00	12.00
1,067.00	HHW2/YD	HHW SOLID PESTICIDE LPK HHPSOL	1.05	1,120.35
66.00	BAT2/30	BATTERIES/CADMIUM, NICKEL HHNICD	1.20	79.20

Subtotal	Continued
Sales Tax	Continued
Total Invoice Amount	Continued
Payment/Credit Applied	
TOTAL	Continued

Check/Credit Memo No:

Environmental Enterprises, Inc

10163 Cincinnati-Dayton Road
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INVOICE

Invoice Number: 04-137873

Invoice Date: Apr 30, 2016

Page: 4

Remit to:

L-2760

Columbus, OH 43260-2760

Bill To:

LEXINGTON-FAYETTE URBAN COUNTY
GOVERNME
675 BYRD THURMAN DR
ATTN: ACCTS PAYABLE
LEXINGTON, KY 40510

Ship to:

LEXINGTON-FAYETTE URBAN COUNTY
GOVERNME
1631 OLD FRANKFORT PIKE
LEXINGTON, KY 40504

Customer ID	Customer PO	Payment Terms	
LEXI04	CONTRACT	Net 30 Days	
Sales Rep ID	Shipping Method	Ship Date	Due Date
LABPACK			5/30/16

Quantity	Item	Description	Unit Price	Amount
15.00	HHW9/5	HHW POISONS HHTXLP	1.00	15.00
1.00	HHW11/55	HHW ISOCYANATES HHISO	525.00	525.00
1.00	HHW11/20	HHW ISOCYANATES HHISO	400.00	400.00
1,228.00	HHW8/55	HHW CORROSIVE LPK ALKALINE HHALLP	1.05	1,289.40
1,984.00	BAT3/YD	BATTERIES/LEAD ACID HHPBAC	0.15	297.60
40.00	MERC9	MERCURY HHMERC	30.00	1,200.00
827.00	HHW8/55	HHW CORROSIVE LPK ACID HHACLP	1.05	868.35
19.00	ASBES/20	ASBESTOS HHASB	1.13	21.47
1.00	MSG	PAGE 4 OF 5		
9.00	BAT1/5	BATTERIES/LITHIUM HHLIBT	2.85	25.65
6.60	PCB11/5	PCB LIGHT BALLAST HHBALL	1.65	10.89
1,091.00	HHW13/55	CLEANERS HHCLNR	1.00	1,091.00
1,522.00	NONHAZ6/55	OIL HHOIL	0.16	243.52
844.00	HGBULB1	FLUORESCENT BULBS HHFLOR	0.21	177.24
1.00	LPMISC	SMOKE DETECTORS HHSMOK	15.00	15.00
1,504.00	NONHAZ8/55	ANTIFREEZE HHANTI	0.16	240.64
2,158.00	NONHAZ3/55	PUTTY AND ADHESIVES HHPUTY	0.60	1,294.80
247.00	NONHAZ3/55	HOUSEHOLD BATTERIES HHBAT	1.20	296.40
1.00	MSG	PAGE 5 OF 5		
10,411.00	HHW5/YDBOX	PAINT HHPNT	0.21	2,186.31
1,253.00	SHRED1/YARE	AEROSOLS HHAERO	0.95	1,190.35

Subtotal	Continued
Sales Tax	Continued
Total Invoice Amount	Continued
Payment/Credit Applied	
TOTAL	Continued

Check/Credit Memo No:

Environmental Enterprises, Inc

10163 Cincinnati-Dayton Road
Cincinnati, OH 45241-1586

Voice: (513) 772-2818

Fax: (513) 782-8950

INVOICE

Invoice Number: 04-137873

Invoice Date: Apr 30, 2016

Page: 5

Remit to:

L-2760

Columbus, OH 43260-2760

Bill To:

LEXINGTON-FAYETTE URBAN COUNTY
GOVERNME
675 BYRD THURMAN DR
ATTN: ACCTS PAYABLE
LEXINGTON, KY 40510

Ship to:



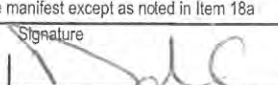
LEXINGTON-FAYETTE URBAN COUNTY
GOVERNME
1631 OLD FRANKFORT PIKE
LEXINGTON, KY 40504

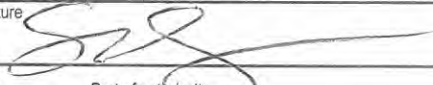


Customer ID	Customer PO	Payment Terms	
LEXI04	CONTRACT	Net 30 Days	
Sales Rep ID	Shipping Method	Ship Date	Due Date
LABPACK			5/30/16

Quantity	Item	Description	Unit Price	Amount
1.00	LPMISC	ACETYLENE CYLINDER HHCOMP	150.00	150.00
1.00	MSG	MANIFEST NUMBER 014914363JJJ, PAGE 1 OF 5		
18.00	HHW15	PROPANE(LARGE) HHPROP	12.00	216.00
1.00	MSG	PAGE 2 OF 5		
4,321.00	HHW6/55	HHW FLAMMABLE LIQUID LPK HHFLLP	1.00	4,321.00
2,589.00	FHB1/300	BULK FLAMMABLE SOLVENTS HHBFL	0.16	414.24
1,884.00	HHW1/55	HHW LIQUID PESTICIDE LPK HHPLIQ	1.05	1,978.20
1.00	MSG	PAGE 3 OF 5		
1,309.00	BAT3/YD	BATTERIES/LEAD ACID HHPBAC	0.15	196.35
1.00	MSG	PAGE 4 OF 5		
1,470.00	HHW13/55	CLEANERS HHCLNR	1.00	1,470.00
2,024.00	NONHAZ6/300	OIL HHOIL	0.16	323.84
820.00	NONHAZ3/YAF	PUTTY AND ADHESIVES HHPUTY	0.60	492.00
1.00	MSG	PAGE 5 OF 5		
4,372.00	HHW5/YDBOX	PAINT HHPNT	0.21	918.12
9.00	MTDM/55	EMPTY DRUMS HHMT	20.00	180.00
1.00	LPMISC	SETUP & MOBILIZATION/DEMOBILIATION FEE	13,000.00	13,000.00

Subtotal	80,370.75
Sales Tax	
Total Invoice Amount	80,370.75
Payment/Credit Applied	
TOTAL	80,370.75

Check/Credit Memo No:

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number EXEMPT	2. Page 1 of 1	3. Emergency Response Phone (800) 392-1503	4. Manifest Tracking Number 014914370 JJK
5. Generator's Name and Mailing Address EEL - LFUCG 1631 Old Frankfort Pike Lexington, KY 40504			Generator's Site Address (if different than mailing address) (859) 367-4948		
6. Transporter 1 Company Name Midwest Environmental Transport, Inc.			U.S. EPA ID Number OH0000000539		
7. Transporter 2 Company Name			U.S. EPA ID Number		
8. Designated Facility Name and Site Address Environmental Enterprises, Inc. 4850 Spring Grove Avenue Cincinnati, OH 45232			U.S. EPA ID Number OHD083377010		
Facility's Phone: (513) 541-1823					
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity
					12. Unit Wt./Vol.
					13. Waste Codes
	X	1. NON-Regulated oil 16-14540-41 002 TP 002006			None
	X	2. NON-Regulated Antifreeze 14542 001 TP 001006			None
	X	3. NON-Regulated Antifreeze 14543 001 TP 003006			None
		4.			
14. Special Handling Instructions and Additional Information EEI Work Order # 04-137873 Emergency Contact: Emergency Response Coordinator (800) 392-1503 and contact 911 2X 250 gallon tote 1X 250 gallon tote 1X 300 gallon tote E26#128					
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/Offor's Printed/Typed Name SHERI RUBERG			Signature 		Month Day Year 04/23/16
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.:		
	Transporter signature (for exports only):				
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials				
	Transporter 1 Printed/Typed Name DAN MCCOBB		Signature 		Month Day Year 4/23/16
	Transporter 2 Printed/Typed Name		Signature		Month Day Year
DESIGNATED FACILITY	18. Discrepancy				
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> 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 Mike Campbell			Signature 		Month Day Year 04/25/16

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number EXEMPT		2. Page 1 of 1		3. Emergency Response Phone (800) 392-1503		4. Manifest Tracking Number 014914373 JJK		
		5. Generator's Name and Mailing Address EEI - LFUCG 1631 Old Frankfort Pike Lexington, KY 40504 Generator's Phone: (859) 367-4948		Generator's Site Address (if different than mailing address)						
6. Transporter 1 Company Name Midwest Environmental Transport, Inc.		U.S. EPA ID Number OH0000000539								
7. Transporter 2 Company Name		U.S. EPA ID Number								
8. Designated Facility Name and Site Address Environmental Enterprises, Inc. 4650 Spring Grove Avenue Cincinnati, OH 45232 Facility's Phone: (513) 541-1823		U.S. EPA ID Number OHD083377010								
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
		1. UN1070, Propane, 2.1 Non-regulated (putty + adhesive) 16-14390 91				002 CF		01600	P	None
	X	2. RQ, UN2588, Pesticides, solid, toxic, n.o.s., (daizinin, sevin), 6.1, PGII 14392				001 CF		00700	P	None
	X	3. Consumer Commodity, (Household Paint), ORM-D 14393-46				054 CF		37800	P	None
	X	4. Consumer Commodity, (Aerosols), ORM-D Cans 14487-48				002 CF		01000	P	NONE
14. Special Handling Instructions and Additional Information <div style="display: flex; justify-content: space-between;"> <div> 1. HHPPT 2x yard 2. HHPOL 151 1x yard 3. HHPNT 54x yard 4. HHAERL 2x yard </div> <div> EEI Work Order # 04-137873 Emergency Contact: Emergency Response Coordinator (800) 392-1503 and contact 911 </div> </div>										
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/Offor's Printed/Typed Name: SHERI RUBERG Signature:  Month: 10 Day: 23 Year: 16										
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:									
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name: Taylor C. McCall Signature:  Month: 4 Day: 23 Year: 16 Transporter 2 Printed/Typed Name: Signature: Month: Day: Year:									
DESIGNATED FACILITY	18. Discrepancy									
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> 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 Name: DALE CAMPBELL Signature:  Month: 10 Day: 25 Year: 16										

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number EXEMPT	2. Page 1 of 1	3. Emergency Response Phone (800) 392-1503	4. Manifest Tracking Number 014914372 JJK		
5. Generator's Name and Mailing Address EEI - LFUCG 1631 Old Frankfort Pike Lexington, KY 40504			Generator's Site Address (if different than mailing address) (859) 367-4848				
6. Transporter 1 Company Name Midwest Environmental Transport, Inc.			U.S. EPA ID Number OH0000000539				
7. Transporter 2 Company Name			U.S. EPA ID Number				
8. Designated Facility Name and Site Address Environmental Enterprises, Inc. 4650 Spring Grove Avenue Cincinnati, OH 45232			U.S. EPA ID Number OHD083377010				
9a. HM			9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers No. Type	11. Total Quantity	
					12. Unit Wt./Vol.	13. Waste Codes	
GENERATOR	X	1. UN1978, Propane, 2.1 <i>16-14332-33</i>	036	CG	10720	P	None
	X	2. RQ, UN2588, Pesticides, solid, toxic, n.o.s., (daizinin, sevin), 6.1, PGII <i>14334-38</i>	005	CF	03500	F	None
	X	3. Consumer Commodity, (Household Paint), ORM-D <i>14339-82</i>	046	CF	32200	P	None
	X	4. Consumer Commodity, (Aerosol Cans), ORM-D <i>14383-86</i>	004	CF	02000	P	None
14. Special Handling Instructions and Additional Information 1. HHPROP ERG # 115 2x4d 2. HHPSOL ERG # 151 5x4d 3. HHPNT 4x4d 4. HHAERO 4x4d EEI Work Order # 04-137873 Emergency Contact: Emergency Response Coordinator (800) 392-1503 and contact 911							
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 SHERI RUBERG			Signature <i>[Signature]</i>		Month Day Year 04/23/16		
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.			Port of entry/exit: Date leaving U.S.:			
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name: Allen McPherson Signature: <i>[Signature]</i> Month Day Year: 04/23/16 Transporter 2 Printed/Typed Name: _____ Signature: _____ Month Day Year: _____						
DESIGNATED FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	18b. Alternate Facility (or Generator) _____ U.S. EPA ID Number _____						
	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)							
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: <i>[Signature]</i> Signature: <i>[Signature]</i> Month Day Year: 04/23/16							

UNIFORM HAZARDOUS WASTE MANIFEST
(Continuation Sheet)21. Generator ID Number
EXEMPT22. Page
1 of 2

23. Manifest Tracking Number

014914382 JJK

24. Generator's Name

EEI - LFUCG
1631 Old Frankfort Pike
Lexington, KY 40504

25. Transporter

Company Name

Midwest Environmental Transport, Inc.

U.S. EPA ID Number

01H0000000539

26. Transporter

Company Name

U.S. EPA ID Number

27a.
HM

27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))

28. Containers

No.

Type

29. Total
Quantity30. Unit
Wt./Vol.

31. Waste Codes

X

25 UN3090, Lithium metal batteries including lithium alloy batteries,
lithium Batteries. 9, PGII

None

X

26 RQ, UN3432, Polychlorinated biphenyls, solid, Light Ballasts, 9,
PGII

None

27 Non-regulated (household cleaners)

None

28 Non-regulated (oil)

None

29 Non-regulated (fluorescent lamps)

None

30 Non-regulated (oil filters)

None

31 Non-regulated (Smoke Detectors)

None

32 Non-regulated (antifreeze)

None

33 Non-regulated (putty and adhesives)

None

34 Non-regulated (household batteries)

None

16-14387-89 003 CF 02100 P

25. HHA1B1 Special Handling Instructions and Additional Information

ERG # 138

28. HHOL

29. HHFLOR

26. HHBALL (Universal Waste) ERG

30. HHOFIL

27. HHCLNR

31. HHSMOK

32. HHANTI

33. HHPUTY 3 x 4

34. HHBAT

Emergency Contact:

(800) 392-1503

and contact 911

GENERATOR
TRANSPORTER
DESIGNATED FACILITY

33. Transporter Acknowledgment of Receipt of Materials

Printed/Typed Name

Signature

Allen McPherson

Allen McPherson

Month Day Year

10/23/16

34. Transporter Acknowledgment of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number EXEMPT	2. Page 1 of 5	3. Emergency Response Phone (800) 392-1503	4. Manifest Tracking Number 014914364 JJK		
5. Generator's Name and Mailing Address EEL - LFUCG 1631 Old Frankfort Pike Lexington, KY 40504				Generator's Site Address (if different than mailing address) (859) 367-4948			
6. Transporter 1 Company Name Midwest Environmental Transport, Inc.				U.S. EPA ID Number OH0000000539			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address Environmental Enterprises, Inc. 4650 Spring Grove Avenue Cincinnati, OH 45232				U.S. EPA ID Number OH D083377010			
9a. HM		9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.
							13. Waste Codes
X		1. UN1978, Propane, 2.1 <i>16-14659</i>		060 CY		00420	P None
X		2. UN1044, Fire extinguishers, 2.2 <i>16-14650-12</i>		024 084 CY		00420 00840	P None
X		3. UN1956, Compressed gas, n.o.s., (Freon), 2.2					NONE
X		4. UN1072, Oxygen, compressed, 2.2 (5.1)					NONE
14. Special Handling Instructions and Additional Information 1. HHPROP ERG # 115 1x55 2. HHFX ERG # 126 1x55 3. HHFREON ERG # 126 4. HHOXYGEN ERG # 122 EEL Work Order # 04-137873 Emergency Contact: Emergency Response Coordinator (800) 392-1503 and contact 911							
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/Offor's Printed/Typed Name SHERI RUBEN				Signature <i>[Signature]</i>		Month Day Year 04/23/16	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:							
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Patrick Fetiche Signature <i>[Signature]</i> Month Day Year 04/23/16 Transporter 2 Printed/Typed Name Signature Month Day Year							
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number: U.S. EPA ID Number							
18b. Alternate Facility (or Generator)							
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 Dale Campbell				Signature <i>[Signature]</i>		Month Day Year 04/27/16	

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UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		22. Page 2 of 5		23. Manifest Tracking Number 014914364 JSK		
24. Generator's Name EEL LFUCG 1631 Old Frankfort Pike Lexington, KY 40504						
25. Transporter <u>1</u> Company Name Midwest Environmental Transport, Inc.				U.S. EPA ID Number ON00000000539		
26. Transporter _____ Company Name				U.S. EPA ID Number		
27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers		29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes
		No.	Type			
X	5 UN1046, Helium, compressed, 2.2					NONE
X	6 RQ, UN1993, Flammable liquids, n.o.s., (paint, paint thinner), 3, PGII 16-14661-76	016	DF	03200	P	None
X	7 RQ, UN1993, Flammable liquids, n.o.s., (kerosene, gasoline), 3, PGII 14677	001	TT	00300	G	None
X	8 UN1263, Paint, 3, PGII 14678	001	DF	00100	P	None
X	9 NA1057, Lighters, 3, PGII					None
X	10 RQ, UN3021, Pesticides, liquid, flammable, toxic, (malathion, chlordane), 3 (6.1), PGII 14679-97	019	DF	03800	P	None
X	11 UN3178, Flammable solid, inorganic, n.o.s., (magnesium metal), 4.1, PGII					None
X	12 UN2468, Trichloroisocyanuric acid, dry, (Trichloroisocyanuric Acid), 5.1, PGII					None
X	13 RQ, UN3139, Oxidizing liquid, n.o.s., 5.1, PGII 14698-99	002	DF	00350	P	None
X	14 RQ, UN1479, Oxidizing solid, n.o.s., (Oxidizing Solids), 5.1, PGII 14700	001	DF	00100	P	None
32. Special Handling Instructions and Additional Information: 5. HHHELIUM ERG # 121 6. HHFLFP ERG # 128 14X55 7. HHBFL ERG # 128 1X TOTE 8. HHALUM ERG # 127 1X55 9. HHLTR ERG # 140 2X55 10. HHPLIQ ERG # 131 1X55 11. HHFSLP ERG # 133 12. HHTICN ERG # 140 13. HHOXLPL ERG # 140 2X55 14. HHOXLPS ERG # 140 1X55						
Emergency Contact: (800) 392-1503 and contact 911						
33. Transporter _____ Acknowledgment of Receipt of Materials						
Printed/Typed Name		Signature		Month	Day Year	
34. Transporter _____ Acknowledgment of Receipt of Materials						
Printed/Typed Name		Signature		Month	Day Year	
35. Discrepancy						
36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number EXEMPT	22. Page 3 of 5	23. Manifest Tracking Number 014914364 J5K		
24. Generator's Name EET-LFUCG 1631 Old Frankfort Pike Lexington, KY 40504						
25. Transporter 1 Company Name Midwest Environmental Transport, Inc.				U.S. EPA ID Number OH00000000539		
26. Transporter _____ Company Name				U.S. EPA ID Number		
27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers		29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes
		No.	Type			
X	15 UN3105, Organic peroxide type D, liquid, (methyl ethyl ketone peroxide), 5.2, PGII					None
X	16 RQ, UN2588, Pesticides, solid, toxic, n.o.s., (dalzinon, bevin), 6.1, PGII					None
X	17 UN3288, Toxic solid, inorganic, n.o.s., (nickel cadmium battery), 6.1, PGII					None
X	18 UN3288, Toxic solid, inorganic, n.o.s., (lead, chromium), 6.1, PGII					None
X	19 UN3080, Isocyanates, toxic, flammable, n.o.s., 6.1 (3), PGII					None
X	20 RQ, UN3265, Corrosive liquid, basic, inorganic, n.o.s., (sodium hydroxide, potassium hydroxide), 8, PGII	001	DP	00150	P	None
X	21 RQ, UN2784, Batteries, wet, filled with acid, 8, PGIII	003	DF	00600	P	None
X	22 RQ, UN2809, Mercury, 8, PGIII					None
X	23 RQ, UN3264, Corrosive liquid, acidic, inorganic, n.o.s., (hydrochloric acid, sulfuric acid), 8, PGII					None
X	24 RQ, NA2212, Asbestos, 9, PGIII					None
32. Special Handling Instructions and Additional Information: 15. HHOPER ERG # 145 16. HHTXLP ERG # 151 17. HHMERC ERG # 172 18. HHPSOL ERG # 151 19. HHISO ERG # 155 20. HHACLP ERG # 154 17. HHNIDC ERG # 151 21. HHPBAC ERG # 154 22. HHASB ERG # 171						
Emergency Contact: (800) 382-1503 and contact 911						
33. Transporter Acknowledgment of Receipt of Materials						
Printed/Typed Name		Signature		Month	Day	Year
34. Transporter Acknowledgment of Receipt of Materials						
Printed/Typed Name		Signature		Month	Day	Year
35. Discrepancy						
36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						

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UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number EXEMPT	22. Page 4 of 5	23. Manifest Tracking Number 014914364 JJK	
24. Generator's Name EEL-LFUCG 1631 Old Frankfort Pike Lexington, KY 40504					
25. Transporter 1 Company Name Midwest Environmental Transport, Inc.				U.S. EPA ID Number 040000000539	
26. Transporter _____ Company Name				U.S. EPA ID Number	
GENERATOR	27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No. Type		29. Total Quantity
	X	25 UN3090, Lithium metal batteries including lithium alloy batteries, lithium Batteries, 9, PGII			
	X	26 RC, UN3432, Polychlorinated biphenyls, solid, Light Ballasts, 9, PGII			
		27 Non-regulated (household cleaners) 16-14709-17	009	DP	01800 P
		28 Non-regulated (oil) 14702 14718-20	004 003	TT	00400 G
		29 Non-regulated (fluorescent lamps) 14721	001	DP	00100 P
		30 Non-regulated (oil filters)			
		31 Non-regulated (Smoke Detectors)			
		32 Non-regulated (antifreeze) 14722-24	003	DM	01200 P
		33 Non-regulated (putty and adhesives) 14725-36	012	CF	04000 P
	34 Non-regulated (household batteries) 14737	001	DF	00600 P	
32. Special Handling Instructions and Additional Information <div style="display: flex; justify-content: space-between;"> <div> 25. HHUBT ERG # 138 26. HHBALL (Universal Waste) ERG 27. HHCLNR 9 X55 </div> <div> 28. HHOIL 1X55 29. HHFLOR 1X55 30. HHOFIL 31. HHSMOK </div> <div> 32. HHANTI 5X55 33. HHPUTY 3X55, 1X55, 1X20 34. HHBAT 1X55 </div> </div>					
Emergency Contact: (800) 392-1503 and contact 911					
TRANSPORTER	33. Transporter _____ Acknowledgment of Receipt of Materials Printed/Typed Name		Signature		Month Day Year
	34. Transporter _____ Acknowledgment of Receipt of Materials Printed/Typed Name		Signature		Month Day Year
DESIGNATED FACILITY	35. Discrepancy				
	36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)				

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UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number EXEMPT		22. Page 5 of 5		23. Manifest Tracking Number 014914364JJK		
24. Generator's Name EEI-LFUCG 1631 Old Frankfort Pike Lexington, KY 40504								
25. Transporter <u>1</u>		Company Name Midwest Environmental Transport, Inc.				U.S. EPA ID Number 01H0000000539		
26. Transporter _____		Company Name _____				U.S. EPA ID Number _____		
GENERATOR	27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		28. Containers No. Type		29. Total Quantity	30. Unit Wt./Vol.	
	X	35. Consumer Commodity, (Household Paint), ORM-D 16-14738-53		016 CF		10800	P	
	X	36. Consumer Commodity, (aerosol cans), ORM-D						
		37. RCRA Empty Drums		003 DM		00120	P	
		38						
		39						
		40						
		41						
		42						
		43						
32. Special Handling Instructions and Additional Information 35. HHPNT 15X44, 1X20 36. HHAERO 37. HHTOM 3X55								
Emergency Contact: (800) 392-1503 and contact 911								
TRANSPORTER	33. Transporter _____		Acknowledgment of Receipt of Materials		Signature			Month Day Year
	34. Transporter _____		Acknowledgment of Receipt of Materials		Signature			Month Day Year
DESIGNATED FACILITY	35. Discrepancy							
	36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

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Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number EXEMPT	2. Page 1 of 5	3. Emergency Response Phone (800) 392-1503	4. Manifest Tracking Number 014914365 JJK	
5. Generator's Name and Mailing Address EEL - LFUCG 1631 Old Frankfort Pike Lexington, KY 40504			Generator's Site Address (if different than mailing address) (859) 367-4948			
6. Transporter 1 Company Name Midwest Environmental Transport, Inc.			U.S. EPA ID Number OH0000000539			
7. Transporter 2 Company Name			U.S. EPA ID Number			
8. Designated Facility Name and Site Address Environmental Enterprises, Inc. 4650 Spring Grove Avenue Cincinnati, OH 45232			U.S. EPA ID Number OH D083377010			
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.
	X	1. UN1978, Propane, 2.1 <i>16-15257-54</i>	175	CY	00502	P
	X	2. UN1044, Fire extinguishers, 2.2 <i>15255-56</i>	051	CY	00510	P
	X	3. UN1956, Compressed gas, n.o.s., (Freon), 2.2 <i>15257</i>	007	CY	00060	P
	X	4. UN1072, Oxygen, compressed, 2.2 (5.1) <i>15258</i>	001	CY	00020	P
13. Waste Codes None						
14. Special Handling Instructions and Additional Information <div style="display: flex; justify-content: space-between;"> <div> 1. HHPROP ERG # 115 <i>3X55 (162x1) 18yd (12x20, 18x100#)</i> 2. HHFX ERG # 120 <i>2X55</i> 3. HHFREON ERG # 120 <i>1X30</i> 4. HHOXYGEN ERG # 122 <i>1X20</i> </div> <div style="text-align: right;"> EEI Work Order # 04-137873 Emergency Contact: Emergency Response Coordinator (800) 392-1503 and contact 911 </div> </div>						
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/Offoror's Printed/Typed Name SHERI RUBERG						
Signature <i>[Signature]</i>						
Month Day Year 04/23/16						
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____					
	17. Transporter Acknowledgment of Receipt of Materials					
TRANSPORTER	Transporter 1 Printed/Typed Name Ken Wilson		Signature <i>[Signature]</i>		Month Day Year 04/23/16	
	Transporter 2 Printed/Typed Name		Signature		Month Day Year	
DESIGNATED FACILITY	18. Discrepancy					
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
	Manifest Reference Number:					
	18b. Alternate Facility (or Generator) U.S. EPA ID Number					
	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)						
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 Steve Campbell						
Signature <i>[Signature]</i>						
Month Day Year 04/23/16						

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number EXEMPT	22. Page 2 of 5	23. Manifest Tracking Number 01491436555K	
24. Generator's Name EI - LFUCG 1631 Old Frankfort Pike Lexington, KY 40504					
25. Transporter 1 Company Name Midwest Environmental Transport, Inc.			U.S. EPA ID Number 010000000539		
26. Transporter _____ Company Name			U.S. EPA ID Number		

27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers		29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes	
		No.	Type				
X	5 UN1046, Helium, compressed, 2.2 16-15259	0013	CY	007200	P	NONE	
X	6 RQ, UN1993, Flammable liquids, n.o.s., (paint, paint thinner), 3, PGII 15260-66	007	DF	01400	P	None	
X	7 RQ, UN1993, Flammable liquids, n.o.s., (kerosene, gasoline), 3, PGII 15267	001	DF	00030	G	None	
X	8 UN1263, Paint, 3, PGII 15268	001	CF	00500	P	None	
X	9 NA1057, Lighters, 3, PGII 15269	001	DF	00005	P	None	
X	10 RQ, UN3021, Pesticides, liquid, flammable, toxic, (malathion, chlordane), 3 (6.1), PGII 15270-74	005	DF	00900	P	None	
X	11 UN3176, Flammable solid, inorganic, n.o.s., (magnesium metal), 4.1, PGII 15275-76	002	DF	00120	P	None	
X	12 UN2468, Trichloroisocyanuric acid, dry, (Trichloroisocyanuric Acid), 5.1, PGII					None	
X	13 RQ, UN3139, Oxidizing liquid, n.o.s., 5.1, PGII 15277-78	002	DF	00300	P	None	
X	14 RQ, UN1479, Oxidizing solid, n.o.s., (Oxidizing Solids), 5.1, PGII 15279-80	002	DF	00300	P	None	

32. Special Handling Instructions and Additional Information: HHAUM ERG # 121 **1X4d** 12. HHTICN ERG # 140
 HHHELIUM ERG # 121 **1X4d** 9. HHLTR **1X5** 13. HHXLPL ERG # 140 **2X55**
 HHFLP ERG # 128 **7X55** 10. HHPLIQ ERG # 131 **5X55** 14. HHXLPS ERG # 140 **2X55**
 HHBFL ERG # 128 **1X3d** 11. HHFSLP ERG # 133 **1X3d, 1X2d**

Emergency Contact:
(800) 392-1503
and contact 911

33. Transporter _____ Printed/Typed Name	Acknowledgment of Receipt of Materials Signature	Month	Day	Year
34. Transporter _____ Printed/Typed Name	Acknowledgment of Receipt of Materials Signature	Month	Day	Year

35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number EXEMPT	22. Page 3 of 5	23. Manifest Tracking Number 01491436555K		
24. Generator's Name EEL - LFUCG 1831 Old Frankfort Pike Lexington, KY 40504						
25. Transporter <u>1</u> Company Name Midwest Environmental Transport, Inc.			U.S. EPA ID Number 01H0000000539			
26. Transporter _____ Company Name			U.S. EPA ID Number			
27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers		29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes
		No.	Type			
X	15 UN3105, Organic peroxide type D, liquid, (methyl ethyl ketone peroxide), 5.2, PGII <i>16-15281</i>	001	DF	00005	P	None
X	16 RQ, UN2588, Pesticides, solid, toxic, n.o.s., (dalzinon, sevin), 6.1, PGII <i>15282-83</i>	002	CF	01400	P	None
X	17 UN3288, Toxic solid, inorganic, n.o.s., (nickel cadmium battery), 6.1, PGII <i>15284</i>	001	DF	00150	P	None
X	18 UN3288, Toxic solid, inorganic, n.o.s., (lead, chromium), 6.1, PGII <i>15285-86</i>	002	DF	00040	P	None
X	19 UN3080, Isocyanates, toxic, flammable, n.o.s., 6.1 (3), PGII <i>15287-89</i>	002 001	CF DF	0060 00150	P P	None
X	20 RQ, UN3266, Corrosive liquid, basic, inorganic, n.o.s., (sodium hydroxide, potassium hydroxide), 8, PGII <i>15290-94</i>	005	CF	01700	P	None
X	21 RQ, UN2794, Batteries, wet, filled with acid, 8, PGIII <i>15295-96</i>	002	CF	02000	P	None
X	22 RQ, UN2809, Mercury, 8, PGIII <i>15297</i>	001	DF	00100	P	None
X	23 RQ, UN3264, Corrosive liquid, acidic, inorganic, n.o.s., (hydrochloric acid, sulfuric acid), 8, PGII <i>15298-02</i>	005	DF	00900	P	None
X	24 RQ, NA2212, Asbestos, 9, PGIII <i>15303</i>	001	DF	00030	P	None
32. Special Handling Instructions and Additional Information: HHTXLP ERG # 151 2x5 22. HHMERC ERG # 172 1x55 15. HHOPER ERG # 145 1x5 18. HHISO ERG # 155 1x55, 1x2 23. HHACLP ERG # 154 5x55 16. HHPSOL ERG # 151 2x5 20. HHALLP ERG # 154 4x55, 1x5 24. HHASB ERG # 171 1x30 17. HHNICD ERG # 151 1x30 21. HHPBAC ERG # 154 2x5						
Emergency Contact: (800) 392-1503 and contact 911						
33. Transporter _____ Acknowledgment of Receipt of Materials						
Printed/Typed Name		Signature			Month	Day Year
34. Transporter _____ Acknowledgment of Receipt of Materials						
Printed/Typed Name		Signature			Month	Day Year
35. Discrepancy						
36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number EXEMPT	22. Page 4 of 5	23. Manifest Tracking Number 01491436555K	
24. Generator's Name EEL - LFUCG 1631 Old Frankfort Pike Lexington, KY 40504					
25. Transporter Midwest Environmental Transport, INC		U.S. EPA ID Number 01N0000000539			
26. Transporter		U.S. EPA ID Number			
GENERATOR	27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers		29. Total Quantity
			No.	Type	30. Unit Wt./Vol.
	X	25 UN3090, Lithium metal batteries including lithium alloy batteries, lithium Batteries, 9, PGII 16-15304	001	DF	00020 P
	X	26 RQ, UN3432, Polychlorinated biphenyls, solid, Light Ballasts, 9, PGII PCB-005316, 054-2316, 05316	001	DF	00002 K9
		27 Non-regulated (household cleaners) 15305-11	007	DF	01300 P
		28 Non-regulated (oil) 16-15360-68	003	DF	01500 P
		29 Non-regulated (fluorescent lamps) 15348-50	003	CW	00300 P
		30 Non-regulated (oil filters)			
		31 Non-regulated (Smoke Detectors) 15312	001	DF	00005 P
		32 Non-regulated (antifreeze) 15316-18	003	DM	01200 P
	33 Non-regulated (putty and adhesives) 15316-285	010	DF	01850 P	
	34 Non-regulated (household batteries) 15326-29	002	DF	01100 P	
32. Special Handling Instructions and Additional Information					
25. HHLIBT ERG # 138 1X5		28. HHFLOR 2X55, 1XSKID		33. HHPUTY 10X55	
26. HHBALL (Universal Waste) ERG 1X5		30. HHOFIL		34. HHBAT 2X55	
27. HHCLNR 7X55		31. HHSMOK 1X5		32. HHANTI 3X55	
Emergency Contact: (800) 392-1503 and contact 911					
TRANSPORTER	33. Transporter Acknowledgment of Receipt of Materials				
	Printed/Typed Name	Signature	Month	Day	Year
DESIGNATED FACILITY	34. Transporter Acknowledgment of Receipt of Materials				
	Printed/Typed Name	Signature	Month	Day	Year
35. Discrepancy					
36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) H141					

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UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number EXEMPT	22. Page 5 of 5	23. Manifest Tracking Number 01491436555X			
24. Generator's Name EI - LFUCG 1631 Old Frankfort Pike Lexington, KY 40504							
25. Transporter 1 Company Name Midwest Environmental Transport, INC.		U.S. EPA ID Number 0100000000539					
26. Transporter _____ Company Name		U.S. EPA ID Number 1					
GENERATOR	27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No. Type		29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes
	X	35 . Consumer Commodity, (Household Paint), ORM-D 16-15328-4B	016	CF	11200	P	None
	X	36 . Consumer Commodity, (aerosol cans), ORM-D 15344-4B	003	CF	01500	P	None
	X	37 UN1954, Compressed gases, flammable, N.O.S. Acetylene 15344	001	GM	00050	P	None
		38					
		39					
		40					
		41					
		42					
		43					
32. Special Handling Instructions and Additional Information							
35. HHPNT 10x4d 36. HHAERO 3x4d 37. HHCOMP 1x55 EPC#126						Emergency Contact: (800) 392-1503 and contact 911	
TRANSPORTER	33. Transporter _____ Acknowledgment of Receipt of Materials		Signature		Month	Day	Year
	Printed/Typed Name						
DESIGNATED FACILITY	34. Transporter _____ Acknowledgment of Receipt of Materials		Signature		Month	Day	Year
	Printed/Typed Name						
35. Discrepancy							
36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number EXEMPT	2. Page 1 of 5	3. Emergency Response Phone (800) 392-1503	4. Manifest Tracking Number 014914363 JJK	
5. Generator's Name and Mailing Address EEL - LFUCG 1631 Old Frankfort Pike Lexington, KY 40504			Generator's Site Address (if different than mailing address)			
Generator's Phone: (859) 367-4948						
6. Transporter 1 Company Name Midwest Environmental Transport, Inc.			U.S. EPA ID Number OH0000000539			
7. Transporter 2 Company Name			U.S. EPA ID Number			
8. Designated Facility Name and Site Address Environmental Enterprises, Inc. 4660 Spring Grove Avenue Cincinnati, OH 45232			U.S. EPA ID Number OH D083377010			
Facility's Phone: (513) 541-1823						
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.
	X	1. UN1978, Propane, 2.1 <i>16-15080</i>	018	64	00300	P
	X	2. UN1044, Fire extinguishers, 2.2				
	X	3. UN1958, Compressed gas, n.o.s., (Freon), 2.2				
	X	4. UN1072, Oxygen, compressed, 2.2 (5.1)				
13. Waste Codes None						
14. Special Handling Instructions and Additional Information 1. HHPROP ERG # 115 1840 2. HHFX ERG # 120 3. HHFREON ERG # 126 4. HHOXYGEN ERG # 122 EEL Work Order # 04-137873 Emergency Contact: Emergency Response Coordinator (800) 392-1503 and contact 911						
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 SHERI RUBERG		Signature <i>[Signature]</i>		Month Day Year 04 23 16		
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.:			
	Transporter signature (for exports only):					
DESIGNATED FACILITY	17. Transporter Acknowledgment of Receipt of Materials					
	Transporter 1 Printed/Typed Name <i>Kent Friedlander</i>		Signature <i>[Signature]</i>		Month Day Year 04 23 16	
Transporter 2 Printed/Typed Name		Signature		Month Day Year		
18. Discrepancy						
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> 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 <i>Dele Campbell</i>		Signature <i>[Signature]</i>		Month Day Year 04 23 16		

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number EXEMPT	22. Page 2 of 5	23. Manifest Tracking Number 014914363 JSK			
24. Generator's Name EEI - LFUCG 1631 Old Frankfort Pike Lexington, KY 40504							
25. Transporter 1 Company Name Midwest Environmental Transport, Inc.		U.S. EPA ID Number 01H0000000539					
26. Transporter _____ Company Name		U.S. EPA ID Number					
GENERATOR	27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No. Type		29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes
	X	5 UN1046, Helium, compressed, 2.2					NONE
	X	6 RQ, UN1993, Flammable liquids, n.o.s., (paint, paint thinner), 3, PGII 16-15081-04	024	DM	04800	P	None
	X	7 RQ, UN1993, Flammable liquids, n.o.s., (kerosene, gasoline), 3, PGII 15705	001	TT	00300	G	None
	X	8 UN1263, Paint, 3, PGII					None
	X	9 NA1057, Lighters, 3, PGII					None
	X	10 RQ, UN3021, Pesticides, liquid, flammable, toxic, (malathion, chlordane), 3 (6.1), PGII 15706-17	012	DM	02400	P	None
	X	11 UN3178, Flammable solid, inorganic, n.o.s., (magnesium metal), 4.1, PGII					None
	X	12 UN2468, Trichloroisocyanuric acid, dry, (Trichloroisocyanuric Acid), 5.1, PGII					None
	X	13 RQ, UN3139, Oxidizing liquid, n.o.s., 5.1, PGII					None
	X	14 RQ, UN1479, Oxidizing solid, n.o.s., (Oxidizing Solids), 5.1, PGII					None
	32. Special Handling Instructions and Additional Information 8. HHALUM ERG # 127 9. HHUTR ERG # 128 10. HHPLIQ ERG # 131 11. HHFSLP ERG # 133 12. HHICN ERG # 140 13. HHXLPL ERG # 140 14. HHXLPS ERG # 140 HHHELIUM ERG # 121 HHFLP ERG # 128 24x55 HHBFL ERG # 128 1xTOTE						
	Emergency Contact: (800) 392-1503 and contact 911						
	TRANSPORTER	33. Transporter 1 Acknowledgment of Receipt of Materials Printed/Typed Name Kent Friedlander		Signature <i>[Signature]</i>		Month Day Year 4 23 16	
34. Transporter _____ Acknowledgment of Receipt of Materials Printed/Typed Name		Signature		Month Day Year			
DESIGNATED FACILITY	35. Discrepancy						
	36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						


UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number EXEMPT		22. Page 3 of 5		23. Manifest Tracking Number 014914363 JJK	
24. Generator's Name EEL - LFUCG 1831 Old Frankfort Pike Lexington, KY 40504							
25. Transporter <u>1</u> Company Name Midwest Environmental Transport, Inc.				U.S. EPA ID Number 0100000000539			
26. Transporter _____ Company Name				U.S. EPA ID Number			

27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers		29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes	
		No.	Type				
X	15 UN3105, Organic peroxide type D, liquid, (methyl ethyl ketone peroxide), 5.2, PGII					None	
X	16 RQ, UN2588, Pesticides, solid, toxic, n.o.s., (dalzinon, sevin), 6.1, PGII					None	
X	17 UN3288, Toxic solid, inorganic, n.o.s., (nickel cadmium battery), 6.1, PGII					None	
X	18 UN3288, Toxic solid, inorganic, n.o.s., (lead, chromium), 6.1, PGII					None	
X	19 UN3080, Isocyanates, toxic, flammable, n.o.s., 6.1 (3), PGII					None	
X	20 RQ, UN3266, Corrosive liquid, basic, inorganic, n.o.s., (sodium hydroxide, potassium hydroxide), 8, PGII					None	
X	21 RQ, UN2794, Batteries, wet, filled with acid, 8, PGIII					None	
X	22 RQ, UN2809, Mercury, 8, PGIII					None	
X	23 RQ, UN3264, Corrosive liquid, acidic, inorganic, n.o.s., (hydrochloric acid, sulfuric acid), 8, PGII					None	
X	24 RQ, NA2212, Asbestos, 9, PGIII					None	

32. Special Handling Instructions and Additional Information


15. HHOPER	ERG # 145	19. HHISO	ERG # 155	23. HHACLP	ERG # 154
16. HHPSOL	ERG # 151	20. HHALLP	ERG # 154	24. HHASB	ERG # 171
17. HHNICD	ERG # 151	21. HHPBAC	ERG # 154		

Emergency Contact:
(800) 392-1503
and contact 911

33. Transporter <u>1</u> Acknowledgment of Receipt of Materials	
Printed/Typed Name Kent Frisdlender	Signature 
Month Day Year 14 12 16	
34. Transporter _____ Acknowledgment of Receipt of Materials	
Printed/Typed Name	Signature
Month Day Year	
35. Discrepancy	
36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)	

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number EXEMPT		22. Page 4 of 5		23. Manifest Tracking Number 014914363 JJK		
24. Generator's Name EEI - LFUCG 1831 Old Frankfort Pike Lexington, KY 40504								
25. Transporter <u>1</u> Company Name Midwest Environmental Transport, Inc.						U.S. EPA ID Number 01N00000000539		
26. Transporter _____ Company Name						U.S. EPA ID Number		
GENERATOR	27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		28. Containers		29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes
				No.	Type			
	X	25 UN3090, Lithium metal batteries including lithium alloy batteries, lithium Batteries, 9, PGII						None
	X	26 RQ, UN3432, Polychlorinated biphenyls, solid, Light Ballasts, 9, PGII						None
		27 Non-regulated (household cleaners)						None
		28 Non-regulated (oil)						None
		29 Non-regulated (fluorescent lamps)						None
		30 Non-regulated (oil filters)						None
		31 Non-regulated (Smoke Detectors)						None
		32 Non-regulated (antifreeze)						None
		33 Non-regulated (putty and adhesives)						None
		34 Non-regulated (household batteries)						None
	32. Special Handling Instructions and Additional Information		28. HHOIL 1X10TE		32. HHANTI		Emergency Contact:	
	25. HHLIBT ERG # 138		29. HHFLOR		33. HHPUTY 4X55		(800) 382-1503	
26. HHBALL (Universal Waste) ERG		30. HHOFIL		34. HHBAT		and contact 911		
27. HHCLNR 8X55		31. HHSOK						
TRANSPORTER	33. Transporter <u>1</u> Acknowledgment of Receipt of Materials			Signature		Month Day Year		
	Printed/Typed Name Kat Ercikander					14 12 31/16		
DESIGNATED FACILITY	34. Transporter _____ Acknowledgment of Receipt of Materials			Signature		Month Day Year		
	Printed/Typed Name							
35. Discrepancy								
36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								

796E

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number EXEMPT		22. Page 5 of 5		23. Manifest Tracking Number 01491436355K				
24. Generator's Name EEL - LFUCG 1631 Old Frankfort Pike Lexington, KY 40504										
25. Transporter <u>1</u> Company Name		Midwest Environmental Transport, Inc.				U.S. EPA ID Number 01H0000000539				
26. Transporter _____ Company Name						U.S. EPA ID Number				
27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers		29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes				
		No.	Type							
X	35. Consumer Commodity, (Household Paint), ORM-D 16-15132-39	0088	CP	05600	P	None				
X	36. Consumer Commodity, (aerosol cans), ORM-D					None				
	37. RCRA Empty Drums	0099	DM	00360	P	None				
	38									
	39									
	40									
	41									
	42									
	43									
	44									
32. Special Handling Instructions and Additional Information										
35. HHPNT 8x4d						Emergency Contact: (800) 392-1503 and contact 911				
36. HHAERO										
37. HHMTOM 9x55										
TRANSPORTER	33. Transporter <u>1</u> Acknowledgment of Receipt of Materials		Signature		Month		Day		Year	
	Printed/Typed Name Kent Fricollander				14		23		16	
DESIGNATED FACILITY	34. Transporter _____ Acknowledgment of Receipt of Materials		Signature		Month		Day		Year	
	Printed/Typed Name									
35. Discrepancy										
36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)										

AFFIDAVIT

Comes the Affiant, Brian J. DePeel, and after being first duly sworn, states under penalty of perjury as follows:

1. His/her name is Brian J. DePeel and he/she is the individual submitting the proposal or is the authorized representative of Environmental Enterprises, Inc., the entity submitting the proposal (hereinafter referred to as "Proposer").
2. Proposer will pay all taxes and fees, which are owed to the Lexington-Fayette Urban County Government at the time the proposal is submitted, prior to award of the contract and will maintain a "current" status in regard to those taxes and fees during the life of the contract.
3. Proposer will obtain a Lexington-Fayette Urban County Government business license, if applicable, prior to award of the contract.
4. Proposer has authorized the Division of Central Purchasing to verify the above-mentioned information with the Division of Revenue and to disclose to the Urban County Council that taxes and/or fees are delinquent or that a business license has not been obtained.
5. Proposer has not knowingly violated any provision of the campaign finance laws of the Commonwealth of Kentucky within the past five (5) years and the award of a contract to the Proposer will not violate any provision of the campaign finance laws of the Commonwealth.
6. Proposer has not knowingly violated any provision of Chapter 25 of the Lexington-Fayette Urban County Government Code of Ordinances, known as "Ethics Act."

Continued on next page

7. Proposer acknowledges that "knowingly" for purposes of this Affidavit means, with respect to conduct or to circumstances described by a statute or ordinance defining an offense, that a person is aware or should have been aware that his conduct is of that nature or that the circumstance exists.

Further, Affiant sayeth naught.



STATE OF Ohio

COUNTY OF Hamilton

The foregoing instrument was subscribed, sworn to and acknowledged before me
by Brian J. DePeel on this the 20th day
of January, 2017.

My Commission expires: August 7, 2021




NOTARY PUBLIC, STATE AT LARGE

CHERYL L. RUBERG
Notary Public, State of Ohio
My Commission Expires 08-07-2021

EQUAL OPPORTUNITY AGREEMENT

The Law

- Title VII of the Civil Rights Act of 1964 (amended 1972) states that it is unlawful for an employer to discriminate in employment because of race, color, religion, sex, age (40-70 years) or national origin.
- Executive Order No. 11246 on Nondiscrimination under Federal contract prohibits employment discrimination by contractor and sub-contractor doing business with the Federal Government or recipients of Federal funds. This order was later amended by Executive Order No. 11375 to prohibit discrimination on the basis of sex.

- Section 503 of the Rehabilitation Act of 1973 states:

The Contractor will not discriminate against any employee or applicant for employment because of physical or mental handicap.

- Section 2012 of the Vietnam Era Veterans Readjustment Act of 1973 requires Affirmative Action on behalf of disabled veterans and veterans of the Vietnam Era by contractors having Federal contracts.
- Section 206(A) of Executive Order 12086, Consolidation of Contract Compliance Functions for Equal Employment Opportunity, states:


The Secretary of Labor may investigate the employment practices of any Government contractor or sub-contractor to determine whether or not the contractual provisions specified in Section 202 of this order have been violated.

The Lexington-Fayette Urban County Government practices Equal Opportunity in recruiting, hiring and promoting. It is the Government's intent to affirmatively provide employment opportunities for those individuals who have previously not been allowed to enter into the mainstream of society. Because of its importance to the local Government, this policy carries the full endorsement of the Mayor, Commissioners, Directors and all supervisory personnel. In following this commitment to Equal Employment Opportunity and because the Government is the benefactor of the Federal funds, it is both against the Urban County Government policy and illegal for the Government to let contracts to companies which knowingly or unknowingly practice discrimination in their employment practices. Violation of the above mentioned ordinances may cause a contract to be canceled and the contractors may be declared ineligible for future consideration.

Please sign this statement in the appropriate space acknowledging that you have read and understand the provisions contained herein. Return this document as part of your application packet.

Bidders

I/We agree to comply with the Civil Rights Laws listed above that govern employment rights of minorities, women, Vietnam veterans, handicapped and aged persons.



Signature

Environmental Enterprises, Inc.
Name of Business

WORKFORCE ANALYSIS FORM

Name of Organization: Environmental Enterprises, Inc.

Categories	Total	White (Not Hispanic or Latino)		Hispanic or Latino		Black or African- American (Not Hispanic or Latino)		Native Hawaiian and Other Pacific Islander (Not Hispanic or Latino)		Asian (Not Hispanic or Latino)		American Indian or Alaskan Native (not Hispanic or Latino)		Two or more races (Not Hispanic or Latino)		Total	
		M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Administrators		5														5	0
Professionals		2												1		3	0
Superintendents																0	0
Supervisors		11	6													11	6
Foremen																0	0
Technicians		13	3	1		8	1			1						23	4
Protective Service																0	0
Para-Professionals		19		1		5										25	0
Office/Clerical		11	8				1									11	9
Skilled Craft		6														6	0
Service/Maintenance			11	7	1		5	1						3		8	20
Total:																	

Prepared by: Barbara Curnutte, HR Director Date: 01/19/17

(Name and Title)

Revised 2015-Dec-15

**DIRECTOR, DIVISION OF CENTRAL PURCHASING
LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT
200 EAST MAIN STREET
LEXINGTON, KENTUCKY 40507**

**NOTICE OF REQUIREMENT FOR AFFIRMATIVE ACTION TO ENSURE EQUAL
EMPLOYMENT OPPORTUNITIES AND DBE CONTRACT PARTICIPATION**

Notice of requirement for Affirmative Action to ensure Equal Employment Opportunities and Disadvantaged Business Enterprises (DBE) Contract participation. Disadvantaged Business Enterprises (DBE) consists of Minority-Owned Business Enterprises (MBE) and Woman-Owned Business Enterprises (WBE).

The Lexington-Fayette Urban County Government has set a goal that not less than ten percent (10%) of the total value of this Contract be subcontracted to Disadvantaged Business Enterprises, which is made up of MBEs and WBEs. The Lexington Fayette Urban County Government also has set a goal that not less than three percent (3%) of the total value of this Contract be subcontracted to Veteran-owned Small Businesses. The goal for the utilization of Disadvantaged Business Enterprises as well Veteran –owned Small Businesses as subcontractors is a recommended goal. Contractor(s) who fail to meet such goal will be expected to provide written explanations to the Director of the Division of Purchasing of efforts they have made to accomplish the recommended goal, and the extent to which they are successful in accomplishing the recommended goal will be a consideration in the procurement process. Depending on the funding source, other DBE goals may apply.

For assistance in locating Disadvantaged Business Enterprises Subcontractors contact:

Sherita Miller, MPA, Division of Central Purchasing
Lexington-Fayette Urban County Government
200 East Main Street, 3rd Floor, Room 338
Lexington, Kentucky 40507
smiller@lexingtonky.gov

Firm Submitting Proposal: Environmental Enterprises, Inc.

Complete Address:	4650 Spring Grove Avenue	Cincinnati	45232
	Street	City	Zip

Contact Name: Brian J. DePeel Title: Director, Lab Pack Services Div.

Telephone Number: 800-850-3587 Fax Number: 513-853-3597

Email address: bdepeel@eeienv.com

ENVIRONMENTAL ENTERPRISES INC.

AFFIRMATIVE ACTION PROGRAM

In Accordance with 41 C.F.R. 60-1.40
and
41 C.F.R. 60-2.1 through 2.15

ENVIRONMENTAL ENTERPRISES, INC.
AFFIRMATIVE ACTION PROGRAM
1998

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- II. Required Utilization Analysis**
- III. Responsibility for Implementation**
- IV. Plan of Action**
- V. Additional Required Ingredients**
- VI. Internal Audit**
 - A. Applicant Information
 - B. Internal Audit Summary
 - C. Impact Study
- VII. Program Summary**

Exhibits

- I. Affirmative Action Statement**
- II. Invitation to Self-Identify**
- III. Employment Agencies & Universities used for Recruitment**

I. PURPOSE AND POLICY

Environmental Enterprises Inc. (EEI) is committed to providing performance based employment opportunities to individuals regardless of race, color, religion, sex, or national origin. The purpose of the EEI Affirmative Action Program is to provide a documented, good faith effort of maintaining equal employment opportunities throughout the company. To achieve this, the company is dedicated to take affirmative action in order to employ and advance in employment, minorities and females.

It is the policy of EEI to seek and employ qualified personnel at all locations and facilities, that employees are treated fairly during employment, without regard to their race, color, religion, sex, or national origin. Such action shall include, but not be limited to the following: Employment, upgrading, demotion, or transfer, recruitment or recruitment advertising, layoff or termination, rates of pay or other forms of compensation, and selection for training.

The company's objective in adopting this Affirmative Action Program is to achieve prompt and full utilization of minorities and females, at all levels and in all segments of its work force where deficiencies are known to exist.

II. REQUIRED UTILIZATION ANALYSIS

III. RESPONSIBILITY FOR IMPLEMENTATION

A. Corporate

The Personnel Manager is designated as Director of the Company's Affirmative Action activities and has overall responsibility for the program. The Personnel Manager is designated as the Equal Employment Opportunity coordinator and is responsible for implementing, monitoring, and administering the program.

The Personnel Manager has been given top management support and the necessary staff to manage implementation of this program. They will continue to:

1. Develop policy statements, Affirmative Action programs, and internal and external communication techniques including discussions with managers, supervisors and employees to ensure that the Company's policies are followed.
2. Advise supervisors that their work performance is evaluated on the basis of their Affirmative Action efforts and that they are responsible for preventing harassment of employees placed through Affirmative Action efforts.
3. Identify problem areas with line management in the implementation of the program and develop solutions to such problems.
4. Maintain an internal audit reporting system to monitor the progress of the program, including records of applicants, transfers/promotions and terminations.
5. Serve as liaison between the Company and various governmental enforcement agencies, community groups and vocational rehabilitation organizations.
6. Serve as liaison between the Company and organizations for minorities and females.
7. Inform management of latest developments in the entire Affirmative Action area.
8. Arrange career counseling for qualified minorities and female employees when it is requested.

B. Responsibilities of Line Managers

Each department manager is responsible for the implementation of the Affirmative Action Program within his or her area of responsibility. This includes monitoring hiring and promotion practices, identifying problem areas, and taking other actions as outlined in this plan.

IV. PLAN OF ACTION

Environmental Enterprises Inc. views its Affirmative Action Program as a result - oriented program designed to enhance the opportunities of minorities and females. The Company recognizes that the ultimate success of this undertaking will be largely the result of the "good faith efforts" detailed in the plan of action section of this Affirmative Action Plan. There is executive support for the plan; dissemination of the commitment to all employees enlisting their adherence to company equal employment opportunity policy has been completed. The substance of the plan to convert commitments to measurable progress is outlined in the following pages.

A. Recruiting

The Company is actively seeking minorities and females for existing and future employment. In order to improve recruitment and increase the flow of minority and female applicants, the Company will contact on a regular basis, State and specialized placement agencies.

The Company periodically informs primary recruiting sources, in writing, of its Equal Employment Opportunity policy and maintains a file of sources notified and acknowledgments received. When possible, briefing sessions are conducted on Company premises with representatives from these recruiting sources. A list of the employment agencies and Universities that the Company uses for recruitment purposes is attached as Exhibit III. Recruiting brochures that pictorially represent work situations will include handicapped workers where possible.

B. Employment and Selection

All employees engaged in hiring and selection decisions are trained in nondiscrimination practices in compliance with regulations. Employment decisions are reviewed periodically to monitor results.

Any test utilized in the company's selection process is content valid and related to each job for which it is used.

An Affirmative Action file containing all applications for employment from handicapped individuals and covered veterans is maintained to assure that:

1. Minorities and females are applying.
2. There is a proper representation of available minority and female applicants.
3. Minority and female applicants are being given equal consideration for employment.

C. Promotions

The records of minority and female employees are reviewed to assure that qualified individuals are given equal consideration as opportunities for upgrading, promotion and transfer occur. Where additional training and experience would be beneficial for advancement, management counsels and assists minority and female employees.

D. Training

Minority and female employees are given equal access to all developmental training designed to enhance an employee's ability to assume positions of greater responsibility.

E. Subcontracts

All company contracts include an Equal Employment Opportunity clause, when appropriate.

F. Other

1. A copy of the policy statement signed by EEL's President, is posted on all bulletin boards and issued to all management personnel, supervisors, and employment interviewers.
2. An employee counselor is available, on request, to work with any employee concerning personal or work-related problems.

V. **ADDITIONAL REQUIRED INGREDIENTS**

EEL is committed to providing performance based employment opportunities to individuals regardless of race, color, religion, sex, or national origin. The Personnel Manager of EEL has been directed to ensure that all personnel actions including; requirements for promotional opportunities, compensation, benefits, transfers, layoffs, return from layoff, company-sponsored training, education, tuition assistance, social and recreation programs will be administered without regard to race, color, religion, sex, or national origin.

A. Internal Policy Dissemination

1. Our Company's Equal Employment Opportunity statement has been incorporated into the Employee Handbook.
2. Our Company's Equal Employment Opportunity policy and Affirmative Action program are publicized in company publications.

3. Meetings are held with all of our management level employees for the purpose of informing them of the Company's Equal Employment Opportunity policy and our Affirmative Action Plan.
4. Meetings are conducted with all employees to discuss the Company's Equal Employment Opportunity policy and to explain the individual employee's responsibilities.
5. The Company's Affirmative Action Program is communicated to all employees. Employee responsibility is detailed and employees are afforded an opportunity to discuss the program.
6. Articles covering our Equal Employment Opportunity programs, program reports, promotions etc. of minorities and women are published, when appropriate.
7. Our Equal Employment Opportunity policy is posted on our Company bulletin boards Company wide.
8. Management and other employees engaged in employment placement and transfer or promotion processing receives additional training on applicable State and Federal Equal Employment Opportunity laws for minorities and women. Our Affirmative Action Program is reviewed, in depth, with employees who work in appropriate personnel jobs. In addition, their individual responsibility in assisting the Company in meeting its Affirmative Action objectives is clearly outlined.

B. External Dissemination

1. All major recruiting sources are informed both orally and in writing of the Company's commitment to employ qualified minorities and women. All suitable employment openings are listed at the local office of the Ohio Bureau of Employment Services. These sources are requested to actively recruit and refer minority and women for all positions for which we hire.
2. All recruiting literature contains an Equal Employment Opportunity statement. The Company communicates the existence of its Affirmative Action Program to all employment candidates and informs them of how they can avail themselves of its benefits.
3. A statement relating to the Company's Equal Employment Opportunity policy is sent to all subcontractors and suppliers. The equal opportunity clause and reference to the affirmative action obligations of contractors regarding minorities and women are incorporated in all purchase orders and subcontracts as required by law, executive order and regulations promulgated thereunder.

The Company periodically informs primary recruiting sources in writing of its Equal Employment Opportunity policy and maintains a file of sources notified and acknowledgments received. A list of the employment agencies and Universities that the Company uses for recruitment purposes is attached as *spreadsheet #8*. Recruiting brochures that pictorially represent work situations will include minority and female workers where possible. Other action-oriented programs the Company subscribes to include:

C. Employment and Selection

All employees engaged in hiring and selection decisions are trained in nondiscrimination practices in compliance with regulations. Employment decisions will be reviewed periodically to monitor results.

Any test utilized in the company's selection process is content valid and related to each job for which it is used.

An Affirmative Action file containing all applications for employment is maintained to assure that:

1. Qualified minority and women are applying.
2. There is a proper representation of available minority and female applicants.
3. Minority and female applicants are being given equal consideration for employment.

D. Promotions

The records of minorities and women are reviewed to assure that qualified individuals are given equal consideration as opportunities for upgrading, promotion and transfer occur. Where additional training and experience would be helpful for advancement, management counsels and assists minorities and women.

E. Training

Minorities and women are given equal access to all developmental training designed to enhance an employee's ability to assume positions of greater responsibility.

F. Subcontracts

All company contracts include an Equal Employment Opportunity clause, when appropriate.

G. Other

1. A copy of the policy statement signed by the President is posted on all bulletin boards and issued to all management personnel, supervisors, and employment interviewers.
2. An employee counselor is available on request to work with any employee concerning personal or work-related problems.
3. Affirmative Action measures will be taken to recruit minorities and females not currently in the work force. Relationships with United Way agencies that provide referral services for those minorities and females will be developed. Consideration will be given with regard to flexible work schedules.
4. Company support to develop community relations and community restoration projects will continue in Winton Place.

VI. Internal Audit

Following are the results of our internal audit for newly hired personnel starting from January 1st, 1997 through December 31, 1997. We have compiled four spreadsheets. The spreadsheets illustrate the process of our entire selection from the posting of positions available through the actual selecting and hiring.

Applicants files were developed for each job advertised, and the data collected from the original applicants files was used to compile the information for the following four spreadsheets. The figures in the spreadsheets represent all solicited resumes for the positions that were advertised and filled from the applicant pool. The remainder of this section will include all four spreadsheets with a brief explanation for each one.

The first spreadsheet includes all of the applicants and the mailed-in resumes for the advertised positions available. All figures about race and gender came from the ***Invitation to self-Identify Form***. Every interviewed applicant is given the opportunity to identify him/herself with our Invitation to self-Identify form.

The second sheet shows applicants who were selected to be interviewed.

The third sheet compares the number of applicants in each job group to the number and the percentage of applicants who were invited to be interviewed.

The fourth sheet shows the number of individuals hired, out of the applicant's pool, for the advertised positions compared to the total number of applicants.

Internal Audit Summary

During 1997, 62 people were hired for positions within EEI. Our listing of positions available is now being posted with a variety of traditional sources of recruitment (see spreadsheet #8). Most of our applicant pool came from resumes mailed to the personnel office at the Cincinnati-Dayton Road location. From these resumes, people are chosen as qualified to be interviewed, and then hired.

Following are some highlights from the aforementioned data:

21% of the individuals hired were female, and 26% of individuals hired were minorities. Moreover, of those individuals who were interviewed (as shown on sheet #3) 31% of those who identified themselves as female were interviewed, and 24% of those who identified themselves as minorities were interviewed.

Rejection Rate

- Thirteen females were hired out of an available 92 (14%) or a rejection rate of 86%.
- Forty-nine males were hired out of an available 205 (24%), or a rejection rate of 76%.
- Forty-six Caucasians were hired out of an available 188 (24%), or a rejection rate of 76%.
- Sixteen minorities were hired out of an available 95 (17%), or a rejection rate of 84%.

Terminations & Promotions

While the previous spreadsheets (1, 2, 3 & 4) demonstrated the process followed for hiring new personnel, the following spreadsheets (5,6, & 7) outline the changes that have occurred in the work force during 1997.

After the hiring process, terminations and promotions were taken into consideration, the work force appears as reflected in spreadsheet #5.

Since the impact studies report was finished, there have been activities in all job groups. Please see Sheet #6.

- There were one Caucasian male terminated in Job group #001.
- There were five terminations in Job group # 002, including: three Caucasian males, one Asian male and one Asian female.
- There were twenty terminated in Job group # 003, including: nineteen males (11 Caucasians, 7 Blacks and 1 Indian), and one Asian female.
- There were eleven Caucasian males and seven Black males terminated in Job group #004.
- There was one Black male terminated in Job group #005.
- There were eight Caucasian females and one Black female terminated in Job group #006.
- There were three Caucasians terminated in Job group #007, two females and one male.
- There was one Caucasian male terminated in Job group #011.

The following spreadsheet demonstrates a list of the individuals who have left EEI during 1997.

Spreadsheet #7 is a list of the employees who were promoted during 1997.

Environmental Enterprises, Inc. continues to support community programs to increase recruitment efforts for minorities. The community programs specifically aimed at recruiting women and minorities are the YWCA/Lifestride Program and Jobs Plus (these agencies are listed in sheet #8).

VII. PROGRAM SUMMARY

EEl is statistically compliant with regard to the utilization of handicapped individuals and covered veterans. Attention will be given to female and minority applicants for work groups in existing job groups when employment opportunities exist.



LFUCG MWDBE PARTICIPATION FORM

Bid/RFP/Quote Reference # 2-2017


The MWDBE and/or veteran subcontractors listed have agreed to participate on this Bid/RFP/Quote. If any substitution is made or the total value of the work is changed prior to or after the job is in progress, it is understood that those substitutions must be submitted to Central Purchasing for approval immediately. **Failure to submit a completed form may cause rejection of the bid.**

MWDBE Company, Name, Address, Phone, Email	MBE WBE or DBE	Work to be Performed	Total Dollar Value of the Work	% Value of Total Contract
1. None				
2.				
3.				
4.				

The undersigned company representative submits the above list of MWDBE firms to be used in accomplishing the work contained in this Bid/RFP/Quote. Any misrepresentation may result in the termination of the contract and/or be subject to applicable Federal and State laws concerning false statements and false claims.

Environmental Enterprises, Inc.
Company

January 26, 2017
Date


Company Representative

Director, Lab Pack Services Division
Title



LFUCG MWDBE SUBSTITUTION FORM

Bid/RFP/Quote Reference # _____

The substituted MWDBE and/or veteran subcontractors listed below have agreed to participate on this Bid/RFP/Quote. These substitutions were made prior to or after the job was in progress. These substitutions were made for reasons stated below and are now being submitted to Central Purchasing for approval. By the authorized signature of a representative of our company, we understand that this information will be entered into our file for this project.

SUBSTITUTED MWDBE Company Name, Address, Phone, Email	MWDBE Formally Contracted/ Name, Address, Phone, Email	Work to Be Performed	Reason for the Substitution	Total Dollar Value of the Work	% Value of Total Contract
1.					
2.					
3.					
4.					

The undersigned acknowledges that any misrepresentation may result in termination of the contract and/or be subject to applicable Federal and State laws concerning false statements and false claims.

Company

Company Representative

Date

Title



MWDBE QUOTE SUMMARY FORM

Bid/RFP/Quote Reference # _____

The undersigned acknowledges that the minority and/or veteran subcontractors listed on this form did submit a quote to participate on this project. Failure to submit this form may cause rejection of the bid.

Company Name	Contact Person
Address/Phone/Email	Bid Package / Bid Date

MWDBE Company Address	Contact Person	Contact Information (work phone, Email, cell)	Date Contacted	Services to be performed	Method of Communicati (email, phone meeting, ad, event etc)	Total dollars \$\$ Do Not Leave Blank (Attach Documentation)	MBE * AA HA AS NA Female	Veteran

(MBE designation / AA=African American / HA= Hispanic American/AS = Asian American/Pacific Islander/ NA= Native American)

The undersigned acknowledges that all information is accurate. Any misrepresentation may result in termination of the contract and/or be subject to applicable Federal and State laws concerning false statements and claims.

Company

Company Representative

Date

Title



LFUCG SUBCONTRACTOR MONTHLY PAYMENT REPORT

The LFUCG has a 10% goal plan adopted by city council to increase the participation of minority and women owned businesses in the procurement process. The LFUCG also has a 3% goal plan adopted by cited council to increase the participation of veteran owned businesses in the procurement process. In order to measure that goal LFUCG will track spending with MWDBE and Veteran contractors on a monthly basis. By the signature below of an authorized company representative, you certify that the information is correct, and that each of the representations set forth below is true. Any misrepresentation may result in termination of the contract and/or prosecution under applicable Federal and State laws concerning false statements and false claims. Please submit this form monthly to the Division of Central Purchasing/ 200 East Main Street / Room 338 / Lexington, KY 40507.

Bid/RFP/Quote # _____

Total Contract Amount Awarded to Prime Contractor for this Project _____

Project Name/ Contract #	Work Period/ From: _____ To: _____
Company Name:	Address:
Federal Tax ID:	Contact Person:

Subcontractor Vendor ID (name, address, phone, email)	Description of Work	Total Subcontract Amount	% of Total Contract Awarded to Prime for this Project	Total Amount Paid for this Period	Purchase Order number for subcontractor work (please attach PO)	Scheduled Project Start Date	Scheduled Project End Date

By the signature below of an authorized company representative, you certify that the information is correct, and that each of the representations set forth below is true. Any misrepresentations may result in the termination of the contract and/or prosecution under applicable Federal and State laws concerning false statements and false claims.

Company

Company Representative

Date

Title

LFUCG STATEMENT OF GOOD FAITH EFFORTS

Bid/RFP/Quote # 2-2017

By the signature below of an authorized company representative, we certify that we have utilized the following Good Faith Efforts to obtain the maximum participation by MWDBE and Veteran-Owned business enterprises on the project and can supply the appropriate documentation.

_____ Advertised opportunities to participate in the contract in at least two (2) publications of general circulation media; trade and professional association publications; small and minority business or trade publications; and publications or trades targeting minority, women and disadvantaged businesses not less than fifteen (15) days prior to the deadline for submission of bids to allow MWDBE firms and Veteran-Owned businesses to participate.

_____ Included documentation of advertising in the above publications with the bidders good faith efforts package

_____ Attended LFUCG Central Purchasing Economic Inclusion Outreach event

_____ Attended pre-bid meetings that were scheduled by LFUCG to inform MWDBEs and/or Veteran-Owned Businesses of subcontracting opportunities

_____ Sponsored Economic Inclusion event to provide networking opportunities for prime contractors and MWDBE firms and Veteran-Owned businesses

_____ Requested a list of MWDBE and/or Veteran subcontractors or suppliers from LFUCG and showed evidence of contacting the companies on the list(s).

_____ Contacted organizations that work with MWDBE companies for assistance in finding certified MWDBE firms and Veteran-Owned businesses to work on this project. Those contacted and their responses should be a part of the bidder's good faith efforts documentation.

_____ Sent written notices, by certified mail, email or facsimile, to qualified, certified MWDBEs soliciting their participation in the contract not less than seven (7) days prior to the deadline for submission of bids to allow them to participate effectively.

_____ Followed up initial solicitations by contacting MWDBEs and Veteran-Owned businesses to determine their level of interest.

_____ Provided the interested MWDBE firm and/or Veteran-Owned business with adequate and timely information about the plans, specifications, and requirements of the contract.

_____ Selected portions of the work to be performed by MWDBE firms and/or Veteran-Owned businesses in order to increase the likelihood of meeting the

contract goals. This includes, where appropriate, breaking out contract work items into economically feasible units to facilitate MWDBE and Veteran participation, even when the prime contractor may otherwise perform these work items with its own workforce

_____ Negotiated in good faith with interested MWDBE firms and Veteran-Owned businesses not rejecting them as unqualified without sound reasons based on a thorough investigation of their capabilities. Any rejection should be so noted in writing with a description as to why an agreement could not be reached.

_____ Included documentation of quotations received from interested MWDBE firms and Veteran-Owned businesses which were not used due to uncompetitive pricing or were rejected as unacceptable and/or copies of responses from firms indicating that they would not be submitting a bid.

_____ Bidder has to submit sound reasons why the quotations were considered unacceptable. The fact that the bidder has the ability and/or desire to perform the contract work with its own forces will not be considered a sound reason for rejecting a MWDBE and/or Veteran-Owned business's quote. Nothing in this provision shall be construed to require the bidder to accept unreasonable quotes in order to satisfy MWDBE and Veteran goals.

_____ Made an effort to offer assistance to or refer interested MWDBE firms and Veteran-Owned businesses to obtain the necessary equipment, supplies, materials, insurance and/or bonding to satisfy the work requirements of the bid proposal


_____ Made efforts to expand the search for MWBE firms and Veteran-Owned businesses beyond the usual geographic boundaries.

 X Other--any other evidence that the bidder submits which may show that the bidder has made reasonable good faith efforts to include MWDBE and Veteran participation.

NOTE: Failure to submit any of the documentation requested in this section may be cause for rejection of bid. Bidders may include any other documentation deemed relevant to this requirement which is subject to approval by the MBE Liaison. Documentation of Good Faith Efforts must be submitted with the Bid, if the participation Goal is not met.

The undersigned acknowledges that all information is accurate. Any misrepresentations may result in termination of the contract and/or be subject to applicable Federal and State laws concerning false statements and claims.

Environmental Enterprises, Inc.
Company
January 26, 2017
Date



Company Representative
Director, Lab Pack Services Division
Title

ENVIRONMENTAL ENTERPRISES INCORPORATED

TREATMENT FACILITY
4650 Spring Grove Ave.
Cincinnati, Ohio 45232
(513) 541-1823
Fax: (513) 541-1638
<http://www.eeienv.com>
EPA ID#: OHD 083377010



OFFICE / LABORATORY
10163 Cincinnati - Dayton Rd.
Cincinnati, Ohio 45241
(513) 772-2818
Fax: (513) 782-8950
(800) 722-2818

Lexington-Fayette Urban County Government MWDBE Participation Goals

Environmental Enterprises, Inc. (EEI) is a USEPA / OEPA Part B permitted Hazardous Waste Disposal Facility located in Cincinnati, Ohio. They were incorporated in the State of Ohio in 1976.

Because of the nature of their work including events such as one day HHW Collections, RFP number 2-2017 known as "Hazardous Household Waste Collection Event Spring 2017", EEI does not utilize the services of any outside vendors for Labor, Disposal, Recycling, Supplies or Equipment while performing any of these events.

EEI only provides trained personnel typically with the 40 hour OSHA training with 8 hour annual refresher updates. Secretaries typically receive 24 hour OSHA training with annual updates and Casual Labor employees receive a 4 hour Hazard Awareness training specifically designed for HHW collections.

For this reason, EEI is a self-contained entity on these projects and does not utilize outside resources.

GENERAL PROVISIONS

1. Each Respondent shall comply with all Federal, State & Local regulations concerning this type of service or good.

The Respondent agrees to comply with all statutes, rules, and regulations governing safe and healthful working conditions, including the Occupational Health and Safety Act of 1970, 29 U.S.C. 650 *et. seq.*, as amended, and KRS Chapter 338. The Respondent also agrees to notify the LFUCG in writing immediately upon detection of any unsafe and/or unhealthful working conditions at the job site. The Respondent agrees to indemnify, defend and hold the LFUCG harmless from all penalties, fines or other expenses arising out of the alleged violation of said laws.

2. Failure to submit ALL forms and information required in this RFP may be grounds for disqualification.
3. Addenda: All addenda, if any, shall be considered in making the proposal, and such addenda shall be made a part of this RFP. Before submitting a proposal, it is incumbent upon each proposer to be informed as to whether any addenda have been issued, and the failure to cover in the bid any such addenda may result in disqualification of that proposal.
4. Proposal Reservations: LFUCG reserves the right to reject any or all proposals, to award in whole or part, and to waive minor immaterial defects in proposals. LFUCG may consider any alternative proposal that meets its basic needs.
5. Liability: LFUCG is not responsible for any cost incurred by a Respondent in the preparation of proposals.
6. Changes/Alterations: Respondent may change or withdraw a proposal at any time prior to the opening; however, no oral modifications will be allowed. Only letters, or other formal written requests for modifications or corrections of a previously submitted proposal which is addressed in the same manner as the proposal, and received by LFUCG prior to the scheduled closing time for receipt of proposals, will be accepted. The proposal, when opened, will then be corrected in accordance with such written request(s), provided that the written request is contained in a sealed envelope which is plainly marked "modifications of proposal".
7. Clarification of Submittal: LFUCG reserves the right to obtain clarification of any point in a bid or to obtain additional information from a Respondent.
8. Bribery Clause: By his/her signature on the bid, Respondent certifies that no employee of his/hers, any affiliate or Subcontractor, has bribed or attempted to bribe an officer or employee of the LFUCG.

9. Additional Information: While not necessary, the Respondent may include any product brochures, software documentation, sample reports, or other documentation that may assist LFUCG in better understanding and evaluating the Respondent's response. Additional documentation shall not serve as a substitute for other documentation which is required by this RFP to be submitted with the proposal,
10. Ambiguity, Conflict or other Errors in RFP: If a Respondent discovers any ambiguity, conflict, discrepancy, omission or other error in the RFP, it shall immediately notify LFUCG of such error in writing and request modification or clarification of the document if allowable by the LFUCG.
11. Agreement to Bid Terms: In submitting this proposal, the Respondent agrees that it has carefully examined the specifications and all provisions relating to the work to be done attached hereto and made part of this proposal. By acceptance of a Contract under this RFP, proposer states that it understands the meaning, intent and requirements of the RFP and agrees to the same. The successful Respondent shall warrant that it is familiar with and understands all provisions herein and shall warrant that it can comply with them. No additional compensation to Respondent shall be authorized for services or expenses reasonably covered under these provisions that the proposer omits from its Proposal.
12. Cancellation: If the services to be performed hereunder by the Respondent are not performed in an acceptable manner to the LFUCG, the LFUCG may cancel this contract for cause by providing written notice to the proposer, giving at least thirty (30) days notice of the proposed cancellation and the reasons for same. During that time period, the proposer may seek to bring the performance of services hereunder to a level that is acceptable to the LFUCG, and the LFUCG may rescind the cancellation if such action is in its best interest.

A. Termination for Cause

- (1) LFUCG may terminate a contract because of the contractor's failure to perform its contractual duties
- (2) If a contractor is determined to be in default, LFUCG shall notify the contractor of the determination in writing, and may include a specified date by which the contractor shall cure the identified deficiencies. LFUCG may proceed with termination if the contractor fails to cure the deficiencies within the specified time.
- (3) A default in performance by a contractor for which a contract may be terminated shall include, but shall not necessarily be limited to:
 - (a) Failure to perform the contract according to its terms,

- conditions and specifications;
- (b) Failure to make delivery within the time specified or according to a delivery schedule fixed by the contract;
 - (c) Late payment or nonpayment of bills for labor, materials, supplies, or equipment furnished in connection with a contract for construction services as evidenced by mechanics' liens filed pursuant to the provisions of KRS Chapter 376, or letters of indebtedness received from creditors by the purchasing agency;
 - (d) Failure to diligently advance the work under a contract for construction services;
 - (e) The filing of a bankruptcy petition by or against the contractor; or
 - (f) Actions that endanger the health, safety or welfare of the LFUCG or its citizens.

B. At Will Termination

Notwithstanding the above provisions, the LFUCG may terminate this contract at will in accordance with the law upon providing thirty (30) days written notice of that intent. Payment for services or goods received prior to termination shall be made by the LFUCG provided these goods or services were provided in a manner acceptable to the LFUCG. Payment for those goods and services shall not be unreasonably withheld.

- 13. **Assignment of Contract:** The contractor shall not assign or subcontract any portion of the Contract without the express written consent of LFUCG. Any purported assignment or subcontract in violation hereof shall be void. It is expressly acknowledged that LFUCG shall never be required or obligated to consent to any request for assignment or subcontract; and further that such refusal to consent can be for any or no reason, fully within the sole discretion of LFUCG.
- 14. **No Waiver:** No failure or delay by LFUCG in exercising any right, remedy, power or privilege hereunder, nor any single or partial exercise thereof, nor the exercise of any other right, remedy, power or privilege shall operate as a waiver hereof or thereof. No failure or delay by LFUCG in exercising any right, remedy, power or privilege under or in respect of this Contract shall affect the rights, remedies, powers or privileges of LFUCG hereunder or shall operate as a waiver thereof.
- 15. **Authority to do Business:** The Respondent must be a duly organized and authorized to do business under the laws of Kentucky. Respondent must be in good standing and have full legal capacity to provide the services specified under this Contract. The Respondent must have all necessary right and lawful authority to enter into this Contract for the full term hereof and that proper corporate or other action has been duly taken authorizing the Respondent to enter into this

Contract. The Respondent will provide LFUCG with a copy of a corporate resolution authorizing this action and a letter from an attorney confirming that the proposer is authorized to do business in the State of Kentucky if requested. All proposals must be signed by a duly authorized officer, agent or employee of the Respondent.

16. **Governing Law:** This Contract shall be governed by and construed in accordance with the laws of the Commonwealth of Kentucky. In the event of any proceedings regarding this Contract, the Parties agree that the venue shall be the Fayette County Circuit Court or the U.S. District Court for the Eastern District of Kentucky, Lexington Division. All parties expressly consent to personal jurisdiction and venue in such Court for the limited and sole purpose of proceedings relating to this Contract or any rights or obligations arising thereunder. Service of process may be accomplished by following the procedures prescribed by law.
17. **Ability to Meet Obligations:** Respondent affirmatively states that there are no actions, suits or proceedings of any kind pending against Respondent or, to the knowledge of the Respondent, threatened against the Respondent before or by any court, governmental body or agency or other tribunal or authority which would, if adversely determined, have a materially adverse effect on the authority or ability of Respondent to perform its obligations under this Contract, or which question the legality, validity or enforceability hereof or thereof.
18. Contractor understands and agrees that its employees, agents, or subcontractors are not employees of LFUCG for any purpose whatsoever. Contractor is an independent contractor at all times during the performance of the services specified.
19. If any term or provision of this Contract shall be found to be illegal or unenforceable, the remainder of the contract shall remain in full force and such term or provision shall be deemed stricken.



Signature

January 26, 2017

Date