

**ORIGINAL**

**Household Hazardous Waste Collection Event**

**PREPARED FOR:**

**Sondra Stone  
Lexington-Fayette Urban County Government  
200 East Main Street  
Lexington, KY 40507**

**DATE DUE: August 17, 2022**

**TIME DUE: 2:00 p.m.**

**RFP #44-2022**



**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](mailto:bdepeel@eeienv.com)**

**Visit our WEB site at [www.eeienv.com](http://www.eeienv.com)**

# ENVIRONMENTAL ENTERPRISES INCORPORATED

TREATMENT FACILITY  
4650 Spring Grove Ave.  
Cincinnati, Ohio 45232  
(513) 541-1823  
Fax: (513) 541-1638  
[http:// www.eeienv.com](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

August 17, 2022

Lexington-Fayette Urban County Government  
200 East Main Street  
Lexington, KY 40507  
Sondra Stone

Dear Ms. Stone:

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, October 22, 2022 from 8:30 a.m. to 3:00 p.m. at 1631 Old Frankfort Pike in Lexington, Kentucky. EEI understands this pricing will go into effect and be used for any future events planned by the LFUCG while the agreement is in place. 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 46 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](mailto:bdepeel@eeienv.com) or (800) 850-3587 at your convenience.

Sincerely,  
**Environmental Enterprises, Inc.**

A handwritten signature in blue ink, appearing to read 'Brian J. DePeel', is written over a light blue horizontal line.

Brian J. DePeel, Director  
Lab Pack Services Division



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Qualifications

References

Insurance, License & Permits

Violations

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On-Site Cost Tracking Method -

Equipment List - Off-Site Facilities List

- Operations Plan - Unknown Testing -

Lithium Battery Packaging/Shipping

Guidelines - Emergency/Spill

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Plan - Volunteer Training

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Pricing Sheets

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Affidavit

Equal Opportunity Agreement

Workforce Analysis Form

Affirmative Action Form

Minority Business Form

General Provisions

**Fall 2022**

**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. 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 39 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-six 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 thirteen 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: James Crawford**  
**(513) 782-8922**

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



***RFP #44-2022 Household Hazardous Waste Collection Event  
Lexington-Fayette Urban County Government***

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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](mailto:lmonahan@lexingtonky.gov)

EI was awarded the HHW Collection for **Lexington Fayette Urban County Government (LFUCG)** for 2016, 2017, 2018 and performed their second or fall collection in 2018 in October.

The initial collection with EI was in 2016 and had 1,561 residents participating, 2017 had 1786 and the two collections in 2018 had a total of 2525 residents participating. EI collected 151,405 pounds of material in 2016, 223,617 pounds in 2017 and 315,203 was collected in 2018 and transported back to EI's facility in Cincinnati, Ohio.

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

On March 3<sup>rd</sup> of 2019, EI was once again awarded LFUCG's HHW collection contract.

2020 brought the cancellation of the spring HHW collection due to the Coronavirus Pandemic and only one collection was held in the fall when 2065 LFUCG residents participated in the collection.

2021 brought back both HHW Collections which brought in 1648 residents in the spring and 1288 in the fall diverting 193,641 pounds of material from the landfill and 80,739 pounds additionally were collected in the fall collection.

The spring 2022 collection had only 1246 residents participate with 79,937 pounds of material being collected by EI.

### **Northern Kentucky Solid Waste Management Area (NKSWMMA)**

Mike Wilson  
Solid Waste Management District Coordinator  
5645 Idlewild Road  
Burlington, Kentucky 41005  
859 334-3629  
[mike.wilson@boonecountyky.org](mailto:mike.wilson@boonecountyky.org)

EI continued its longtime working relationship with NKSWMMA after being awarded the expanded contract again in 2015 and has been performing their collections since then. Our next collection is scheduled for November 2022. EI 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 2,017 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, EEI utilized 4 traffic lanes to keep the cars moving during all 6 hours of this collection. EEI 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 EEI's unmatched experience, knowledge and dedication to detail on each and every event.

Final collection totals for NKSWMMA revealed resident increased to over 3,200 vehicles in 2017 and total poundage to 226,524 pounds.

2018 showed a decrease in the resident participation to 2,843 and the number of pounds of material likewise dropped to 169,977 pounds collected by EEI.

**Vanderburgh County/Evansville, IN**

Ms. Jean Carlson  
Vanderburgh County SWMD  
One N.W. Martin Luther King Jr., Blvd.  
Evansville, IN 47708  
(812) 436-7800  
[jcarlson@vanderburghgov.com](mailto:jcarlson@vanderburghgov.com)

EEI has performed a HHW Collection for Vanderburgh County Solid Waste Management District for 23 of the past 24 years with another two additional collections already scheduled for April and September of 2022.

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.

2016's collection had 1,011 residents participate and 82,015 pounds were collected on this June event collection.

2017 had 1,257 residents participate in their collection with 84,622 pounds of materials collected.

2018 had another site relocation which brought in only 645 residents and 59,669 pounds of materials collected.

2019 had a much larger collection response with 80,419 pound of material collected and 850 residents participating.

2020 was supposed to start multiple collections at Vanderburgh County however, as everyone experienced, it was a Covid-19 year and Vanderburgh County only held one collection with 1,016 residents participating and 84,486 pounds of material were collected.



2021 was the official start of the bi-annual collections for Vanderburgh County and for both collections 1,426 residents participated and over both collections 113,870 pounds of material was collected.

Average wait times for the residents remain below EEI's self-imposed requirement of 20 minutes per vehicle.

### **GLOW Solid Waste Management Committee**

Genesee County  
Livingston County  
Wyoming County

Margaret C. Grayson  
Genesee County Bldg. 2  
3837 West Main Street Road  
Batavia, NY 14020  
(585) 344-2580 Ext. 5463  
[pgrayson@co.genesee.ny.us](mailto:pgrayson@co.genesee.ny.us)

EEI 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. Starting in 2011, the size of the collections grew to 500 residents scheduled to participate and expanded even further in 2013 to 600 scheduled appointments. Initial collection totals started at 18,073 pounds of materials collected in 2005 and grew to 34,114 pounds collected in 2016.

EEI initially provided 8 personnel for the collection in 2005 and increased their personnel to 15 in 2010 to keep wait times for the residents well under EEI's self-imposed limit of 20 minutes. Eighteen (18) EEI personnel were allocated for the Batavia site in 2013 to maintain the expeditious unloading of resident vehicles and remained at this number through 2017. In 2017, the site location was in Livingston County, NY and 626 residents registered and participated in this collection. 22,797 pounds of materials were unloaded, packaged and transported back to EEI from this one day collection.

2018 had the collection move to the third county in GLOW – Wyoming County. 550 residents brought materials into the site with EEI collection and transporting 29,940 pounds of material back to their facility in Cincinnati, Ohio.

EEI has continued to perform their collections and are scheduled to do Genesee County in September 2022.

### **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](mailto: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 EEL's contract through 2018 and requested that EEL 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.

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

EEL's contract has been extended through 2023.

### **Lake County Solid Waste District**

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

EEL just completed their 8<sup>th</sup> 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 four years of this contract. When EEL was awarded this contract, they had been the incumbent vendor the previous 5 years. Lake County has averaged per collection 140,773 pounds of material per collection.

### **Pennsylvania Resources Council (PRC)**

Josh Schuneman  
Program Coordinator / Recycling Coordinator  
64 South 14<sup>th</sup> Street  
Pittsburgh, Pa. 15203  
(412) 431-4449 ext. 213  
[josh@prc.org](mailto:josh@prc.org)

### **Pennsylvania Resources Council (PRC)**

Sarah Alessio Shea – Western PA Director  
64 South 14<sup>th</sup> Street  
Pittsburgh, Pa. 15203  
(412) 431-4449



Josh Schuneman now oversees all operational activities for the seven (7) PRC HHW collections since 2017 while observing Environmental Enterprises, Inc. (EEI) site protocols, safety and operational activities.

EEI has performed six (6) collections for PRC adding a seventh (7) in the fall of 2018 and an additional collection for Beaver County starting in 2022.

**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 2021, the poundage of material for this site was 72,107 pounds with 998 residents participating.

**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. For 2021, this site dropped a bit from Covid-19 of 2020 to 432 vehicles and 50,210 pounds of waste collected.

**Allegheny County – South Park:** This is the 3<sup>rd</sup> 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 2<sup>nd</sup> in resident participation however, on more than one occasion has outdrawn North Park in participation. This site for 2021 had 956 vehicles and collected waste poundage of 60,919 pounds.

**Cambria County:** Performed typically in the spring since 2006 at Compliance Technology in Johnstown, Pa. – which is a neighboring city to Pittsburgh. EEI serviced 311 Cambria County residents in 2021 collecting 40,113 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 2021 – 760 residents participated delivering 45,249 pounds of Household Waste.

**Beaver County:** EEI 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 389 residents in 2021 who delivered 39,464 pounds of acceptable waste to EEI. Beaver County will begin two (2) collections a year beginning in 2022.

**Fayette County:** EEI will began servicing this new client for PRC and EEI in June of 2018. There were 258 cars serviced at this location for a first time event with EEI collecting, packaging and transporting 12,256 pounds of material back to EEI. 2021 brought 192 residents from Fayette County into the Fairgrounds and 28,996 pounds of materials were collected. For 2022, Fayette will begin collection operations at their Recycling Center.

*NOTE: EEI recycles 90% of all materials collected.*





# CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)  
**3/30/2022**

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 have ADDITIONAL INSURED provisions or 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).

<b>PRODUCER</b> <b>The Selzer Company</b> 975 Easton Road Ste. 100 Warrington, PA 18976	<b>CONTACT NAME:</b> Christian M. Archut, CPCU, ARM <b>PHONE (A/C, No, Ext):</b> (215) 491-2700 102 <b>FAX (A/C, No):</b> <b>E-MAIL ADDRESS:</b> christian@selzercompany.com
	INSURER(S) AFFORDING COVERAGE
	NAIC #
<b>INSURED</b> <b>Environmental Enterprises, Inc.</b> <b>Midwest Environmental Transport, Inc.</b> <b>Expressway Commerce Company, Inc.</b> 10163 Cincinnati-Dayton Rd Cincinnati, OH 45241	<b>INSURER A:</b> Starr Surplus Lines Insurance Company <b>13604</b> <b>INSURER B:</b> Starr Indemnity & Liability Co <b>38318</b> <b>INSURER C:</b> American Interstate Insurance <b>31895</b> <b>INSURER D:</b> Westchester Fire Insurance Co <b>10030</b> <b>INSURER E:</b> <b>INSURER F:</b>

**COVERAGES**                                  **CERTIFICATE NUMBER:**                                  **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 INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	
<b>A</b>	<input checked="" type="checkbox"/> <b>COMMERCIAL GENERAL LIABILITY</b>			1000066911221	4/1/2022	4/1/2023	EACH OCCURRENCE	\$ 1,000,000
	CLAIMS-MADE <input type="checkbox"/> OCCUR <input checked="" type="checkbox"/>						DAMAGE TO RENTED PREMISES (Ea occurrence)	\$ 100,000
							MED EXP (Any one person)	\$ 10,000
							PERSONAL & ADV INJURY	\$ 1,000,000
GEN'L AGGREGATE LIMIT APPLIES PER:							GENERAL AGGREGATE	\$ 2,000,000
POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC <input type="checkbox"/>							PRODUCTS - COMP/OP AGG	\$ 2,000,000
OTHER:							<b>STOP GAP</b>	\$ 1,000,000
<b>B</b>	<input checked="" type="checkbox"/> <b>AUTOMOBILE LIABILITY</b>			1000626046221	4/1/2022	4/1/2023	COMBINED SINGLE LIMIT (Ea accident)	\$ 1,000,000
	ANY AUTO OWNED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/>						BODILY INJURY (Per person)	\$
	HIRED AUTOS ONLY <input type="checkbox"/> NON-OWNED AUTOS ONLY <input type="checkbox"/>						BODILY INJURY (Per accident)	\$
							PROPERTY DAMAGE (Per accident)	\$
<b>A</b>	<input type="checkbox"/> <b>UMBRELLA LIAB</b> <input checked="" type="checkbox"/> <b>OCCUR</b>			1000337284221	4/1/2022	4/1/2023	EACH OCCURRENCE	\$ 6,000,000
	<input type="checkbox"/> <b>EXCESS LIAB</b> <input type="checkbox"/> <b>CLAIMS-MADE</b>						AGGREGATE	\$ 6,000,000
	DED <input type="checkbox"/> RETENTION \$ <input type="checkbox"/>						PER STATUTE <input type="checkbox"/> OTH-ER <input type="checkbox"/>	\$
<b>C</b>	<input type="checkbox"/> <b>WORKERS COMPENSATION AND EMPLOYERS' LIABILITY</b>			AVWCVA3076382022	4/29/2022	4/29/2023	E.L. EACH ACCIDENT	\$ 500,000
	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) <input type="checkbox"/> Y / N <input type="checkbox"/> N / A						E.L. DISEASE - EA EMPLOYEE	\$ 500,000
	If yes, describe under DESCRIPTION OF OPERATIONS below						E.L. DISEASE - POLICY LIMIT	\$ 500,000
<b>D</b>	<b>Site Pollution</b>			G71115896 005	4/1/2022	4/1/2023	Limit	8,000,000
<b>D</b>	<b>Financial Responsibi</b>			G71115501 005	4/1/2022	4/1/2023	Limit	2,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)  
 Certificate holder is named as additional insured on the General Liability and Automobile Policies as required by written contract.

<b>CERTIFICATE HOLDER</b>  <b>Environmental Enterprises, Inc.</b> 10163 Cincinnati-Dayton Road Cincinnati, OH 45241	<b>CANCELLATION</b>  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 
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### 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](http://www.bwc.ohio.gov), or call 1-800-644-6292.

This certificate must be conspicuously posted.

Policy number and employer  
00666981

Period Specified Below  
07/01/2022 to 07/01/2023

ENVIRONMENTAL ENTERPRISES INC  
10163 CINCINNATI DAYTON RD  
CINCINNATI OH 45241



[www.bwc.ohio.gov](http://www.bwc.ohio.gov)  
Issued by: BWC

*Stephanie McCloud*

Administrator/CEO

You can reproduce this certificate as needed.

### Ohio Bureau of Workers' Compensation

#### Required Posting

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, marihuana 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, marihuana 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.





### 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](http://www.bwc.ohio.gov), or call 1-800-644-6292.

This certificate must be conspicuously posted.

Policy number and employer  
00943437

Period Specified Below  
07/01/2022 to 07/01/2023

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



[www.bwc.ohio.gov](http://www.bwc.ohio.gov)  
Issued by: BWC

Administrator/CEO

You can reproduce this certificate as needed.

### Ohio Bureau of Workers' Compensation

#### Required Posting

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, marihuana 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, marihuana 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.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

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

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 portion of a Resource Conservation and Recovery Act (RCRA) Hazardous Waste permit for the above-referenced facility. The complete RCRA Hazardous Waste permit contains both federal permit conditions (contained herein) and State permit conditions, which were issued separately by the State of Ohio RCRA program authorized under Title 40 of the Code of Federal Regulations (40 C.F.R.) Part 271. Any hazardous waste activity not included in the federal portion of the RCRA permit or in the State portion of the RCRA permit is prohibited when such activity requires a RCRA Hazardous Waste permit.

The draft federal RCRA permit was publicly noticed in the Cincinnati Enquirer and WKFS 107.1 FM, on or about April 30, 2020. 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 30, 2020 to June 30, 2020.

The U.S. Environmental Protection Agency received no comments on the draft Federal RCRA permit during the public comment period. *Ev. 7/3/20*

This federal permit is effective on September 2, 2020 and valid until August 27, 2030, unless the federal permit is revoked and reissued, or terminated pursuant to 40 C.F.R. § 270.41 and § 270.43. Failure to comply with any conditions of the federal permit may result in civil and/or criminal penalties.

You may appeal the issuance of this permit by filing a petition for review with the Environmental Appeals Board as provided at 40 C.F.R. § 124.19.

A petition for review of any condition of a RCRA permit decision must be filed with the Environmental Appeals Board within 30 days after EPA serves notice of the issuance of the final permit decision. 40 C.F.R. § 124.19(a)(3). When EPA serves the notice by mail, service is deemed to be completed when the notice is placed in the mail, not when it is received. However, to compensate for the delay caused by mailing, the 30-day deadline for filing a petition is extended by three days if the final permit decision being appealed was served on the petitioner by mail. 40 C.F.R. § 124.20(d). Petitions are deemed filed when they are received by the Clerk of the Board at the address specified for the appropriate method of delivery. 40 C.F.R. § 124.19(a)(3) and 40 C.F.R. § 124.19(i). Additional information regarding petitions for review may be found in the Environmental Appeals Board Practice Manual (January 2013) and A Citizen's Guide to EPA's Environmental Appeals Board, both of which are available at [http://yosemite.epa.gov/oa/EAB\\_Web\\_Docket.nsf/General+Information/Environmental+Appeals+Board+Guidance+Documents?OpenDocument](http://yosemite.epa.gov/oa/EAB_Web_Docket.nsf/General+Information/Environmental+Appeals+Board+Guidance+Documents?OpenDocument).

Eligibility to appeal the federal permit is discussed further in 40 C.F.R. § 124.19. General filing requirements are contained in the Practice Manual, The Environmental Appeals Board and A Citizens' Guide to EPA's Environmental Appeals Board.

All documents that are sent through the U.S. Postal Service (except by Express Mail) must be addressed as follows:

Clerk of the Board  
U.S. Environmental Protection Agency  
Environmental Appeals Board  
1200 Pennsylvania Avenue, NW  
Mail Code 1103M  
Washington, DC 20460-0001

Documents that are hand-carried in person, delivered via courier, mailed by Express Mail, or delivered by a non-U.S. Postal Service carrier (e.g., Federal Express or UPS) must be delivered to:

Clerk of the Board  
U.S. Environmental Protection Agency  
Environmental Appeals Board  
1201 Constitution Avenue, NW  
WJC East, Room 3334  
Washington, DC 20004



A copy of the petition should also be sent to:

Land and Chemicals Branch (LL-17J)  
U.S. Environmental Protection Agency, Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

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

If you have any questions concerning this permit, please contact Mr. Jae Lee of my staff, at (312) 886-3781.

Sincerely,

EDWARD  
NAM

Digitally signed by  
EDWARD NAM  
Date: 2020.09.02  
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Edward Nam  
Director  
Land, Chemicals and Redevelopment Division

Enclosures

cc: Bradley Mitchell, 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 Avenue  
Cincinnati, Ohio 45232

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

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

U.S. EPA Identification Number: OHD 083 377 010

Effective Date: September 2, 2020 *F.P.A. 9/3/20*

Expiration Date: August 27, 2030

**Authorized Activities:**

The U.S. Environmental Protection Agency (EPA), Region 5 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" or "Permittees") 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 United States Code (U.S.C.) § 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 C.F.R.)).

Specifically, this permit addresses air emission standards for equipment leaks, containers, tanks, and miscellaneous unit. See 40 C.F.R. Part 264, Subparts BB and CC.

According to Environmental Enterprises, Inc.'s RCRA Part B Permit Application, this facility currently does not operate process vents as defined in 40 C.F.R. Part 264, Subpart AA, Air Emission Standards for Process Vents. Therefore, the requirements under Subpart AA are not set forth in this permit.

The RCRA permit consists of both this permit, which contains the effective Federal RCRA permit conditions, and the effective State RCRA permit conditions under an Ohio Hazardous Waste Permit issued by the State of Ohio's RCRA program authorized under 40 C.F.R. Part 271 (hereinafter the "State RCRA permit"). Any hazardous waste activity which requires a RCRA permit and is not included in the RCRA permit is prohibited.

The State issued a RCRA permit on August 27, 2020. The effective and expiration dates of the State RCRA permit were August 27, 2020 and August 27, 2030, respectively.

**Permit Approval:**

On June 30, 1989, the State of Ohio received final authorization according to Section 3006 of RCRA, 42 U.S.C. § 6926, and 40 C.F.R. Part 271, to administer the pre-HSWA RCRA hazardous waste program. The State of Ohio has also received final authorization to administer certain additional RCRA requirements on several occasions since then.

However, because EPA has not yet authorized the State of Ohio to administer certain HSWA regulations, including the air emission standards for equipment leaks (40 C.F.R. Part 264, Subpart BB) and tanks, containers, and miscellaneous units (40 C.F.R. Part 264, Subpart CC), 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 cross-referenced in these documents, approved submittals (including plans, schedules and other documents), the applicable regulations in 40 C.F.R. Parts 124, 260, 261, 262, 264, 268, 270, and applicable provisions of RCRA. You must also comply with the State RCRA permit.

This permit is based on the assumption that: (1) the information submitted in your RCRA Part A and B Permit Renewal Applications dated April 1, 2019, 40 C.F.R. Part 264, Subpart AA, BB, and CC information dated April 5, 2019, and all other revisions and addendums to that application (hereinafter referred to as the "Part B Permit Application") is complete and accurate, and (2) the facility is configured, operated and maintained as specified in the Part B Permit Application and other relevant documents.

Any inaccuracies in the submitted information may be grounds for EPA to terminate, revoke and reissue, or modify this permit in accordance with 40 C.F.R. §§ 270.41, 270.42 and 270.43; and for enforcement action. You must promptly inform EPA of any deviation from, or changes in, the information in the 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 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 C.F.R. § 124.19.

**Effective Date:**

*2* *EPA 7/7/20*

This permit is effective as of September 2, 2020 and will remain in effect until August 27, 2030, unless revoked and reissued under 40 C.F.R. § 270.41, terminated under 40 C.F.R. § 270.43, or continued in accordance with 40 C.F.R. § 270.51(a).

EDWARD  
NAM

Digitally signed by  
EDWARD NAM  
Date: 2020.09.02  
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By:

Date:

Edward Nam  
Director  
Land, Chemicals and Redevelopment Division

OHD 083 377 010  
Environmental Enterprises, Inc.

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## SECTION I—STANDARD PERMIT CONDITIONS

### IA EFFECT OF PERMIT

This permit contains the federal RCRA permit conditions. You also have a state RCRA permit. You are hereby allowed to manage hazardous waste at the Environmental Enterprises, Inc. (“facility”) in accordance with this permit and the effective state RCRA permit. The storage and treatment of RCRA hazardous waste must comply with all terms and conditions in this permit. Other aspects of the storage and treatment of RCRA hazardous waste are subject to the conditions in the state-issued portion of the RCRA permit. Any hazardous waste activity which requires a RCRA permit and is not included either in this permit or the state RCRA permit, is prohibited.

Subject to 40 C.F.R. § 270.4, compliance with the RCRA permit during its term 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 C.F.R. Part 268 restricting the placement of hazardous waste in or on the land; (3) are promulgated under 40 C.F.R. Part 264 regarding leak detection systems; or (4) are promulgated under Subparts AA, BB, or CC of 40 C.F.R. Part 265 limiting air emissions. (40 C.F.R. § 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 U.S.C. §§ 9601 *et seq.* (commonly known as “CERCLA”); or (3) any other law protecting public health or the environment.

### IB PERMIT ACTIONS

#### IB.1 Permit Review, Modification, Revocation and Reissuance, and Termination

EPA may review, modify, or revoke and reissue this permit, or terminate it for cause, as specified in 40 C.F.R. §§ 270.41, 270.42, and 270.43. EPA may also review and modify this permit, consistent with 40 C.F.R. § 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, 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 C.F.R. § 270.30(f)).

You may request a modification of this permit under the procedures specified in 40 C.F.R. § 270.42. A Class 1 modification is generally allowed without prior approval by EPA, except under certain conditions as described in 40 C.F.R. § 270.42(a)(2). A Class 2 modification requires prior approval by EPA as described in 40 C.F.R. § 270.42(b). 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.

You may perform construction associated with a Class 2 permit modification request beginning 60 calendar days after submission of the request, unless the Director establishes a later date. (40 C.F.R. § 270.42(b)(8)). (Pursuant to Chapter 8-6 of the Region 5 Delegation Manual, the authority assigned to the Regional Administrator as Director under 40 C.F.R. § 270.42(b)(8) has been delegated to the Director of the Land, Chemicals and Redevelopment Division of EPA, Region 5. Thus, for the purposes of this permit, the term Director must refer to the Division Director of EPA Region 5's Land, Chemicals and Redevelopment Division). Procedures for a Class 3 modification are specified in 40 C.F.R. § 270.42(c).

#### **I.B.2 Permit Renewal**

This permit may be renewed as specified in 40 C.F.R. § 270.30(b) and Section I.E.2 of this permit. In reviewing any application for a permit renewal, EPA will consider improvements in the state of control and measurement technology, and changes in applicable regulations. (40 C.F.R. § 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 C.F.R. § 124.16(a)).

#### **I.D DEFINITIONS**

The terms used in this permit will have the same meaning as in 40 C.F.R. 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 C.F.R. § 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 termination, revocation and reissuance, or modification; or denial of a permit renewal application. (40 C.F.R. § 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 calendar 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 C.F.R. §§ 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 until August 27, 2030. 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 C.F.R. § 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 C.F.R. §§ 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 C.F.R. § 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 C.F.R. § 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 necessary to comply with this permit. (40 C.F.R. § 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, 44 U.S.C. §§ 3501 *et seq.* (40 C.F.R. §§ 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 C.F.R. § 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 representative sample of the feed streams, treatment residues, or other hazardous waste to be analyzed must be the appropriate methods from Appendix I of 40 C.F.R. Part 261, or the methods specified in the Waste Characteristics section (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. (40 C.F.R. § 270.30(j)(1)).

**I.E.9.b** You must retain, at the facility, all records as specified in 40 C.F.R. § 264.74.

**I.E.9.c** You must submit all monitoring results at the intervals specified in this permit.

**I.E.9.d** 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 C.F.R. §§ 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 C.F.R. § 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 C.F.R. § 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, in accordance with 40 C.F.R. § 270.30(1)(2)(i). 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:

**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** Within 15 calendar days of the date of submission of the Certification of Construction letter referenced in Section I.E.12 of this permit, the Permittee has not received notice from the Director of his or her intent to inspect, prior inspection is waived and the Permittee may commence treatment, storage, or disposal of hazardous waste in accordance with 40 C.F.R. § 270.30(1)(2)(ii)(B).

#### **I.E.13 Transfer of Permits**

This permit is not transferable to any person, except after notice to and approval of the Director. You must inform the Director in writing and obtain prior written approval of the Director before transferring ownership or operational control of the facility. (40 C.F.R. § 270.42, Appendix I). Under 40 C.F.R. § 270.40, the Director may require permit modification, or revocation and reissuance to change the name of the Permittee and incorporate other RCRA requirements. Before transferring ownership or operation of the facility during its operating life, you must notify the Director and obtain prior approval, and notify the new owner or operator in writing of the requirements of 40 C.F.R. Parts 264, 268, and 270, and you must provide a copy of the RCRA permit to the new owner or operator. (40 C.F.R. §§ 264.12(c), 270.30(1)(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: (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, which 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;
- (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.

(40 C.F.R. § 270.30(I)(6)).

**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 this permit. (40 C.F.R. §§ 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 C.F.R. § 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 B Permit Application or other submittal, or submitted incorrect information in the 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 C.F.R. §§ 270.30(1)(11) and 270.30(h)).

**I.E.16.b** All other requirements contained in 40 C.F.R. § 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 C.F.R. § 270.11. (40 C.F.R. § 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 U.S. Environmental Protection Agency Region 5, Land and Chemicals Branch, at the following address:

Land and Chemicals Branch, LL-17J  
Land, Chemicals and Redevelopment Division  
U.S. EPA Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

**I.H CONFIDENTIAL INFORMATION**

In accordance with 40 C.F.R. 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 C.F.R. Part 2. (40 C.F.R. § 270.12). You have the burden of substantiating that the claimed information is confidential, and EPA may request further information from you regarding such claim, and may reasonably determine which such information to treat as confidential.

**I.I DOCUMENTS TO BE MAINTAINED AT THE FACILITY**

You must maintain at the facility, until closure is completed and certified by an independent registered professional engineer, 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 C.F.R. §§ 264.13, 264.73, 264.1064, 264.1084, 264.1088, and 264.1089.

**I.I.2 Notifications**

You must maintain notifications from generators that are required by 40 C.F.R. § 268.7 to

accompany an incoming shipment of hazardous waste subject to 40 C.F.R. Part 268, Subpart C, that specify treatment standards, as required by 40 C.F.R. §§ 264.73, 268.7, and this permit.

**I.I.3 Copy of Permit**

You must keep a copy of this permit on the facility site, including all of the documents listed in any attachments, 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 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 C.F.R. 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 the RCRA requirements contained in this permit. This permit does not include the requirements imposed by the Clean Air Act.

You must not operate process vents at the facility as defined in 40 C.F.R. § 264.1031.

**SECTION II - AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS  
(40 C.F.R. PART 264, SUBPART BB)**

**II.A EQUIPMENT LEAKS**

**II.A.1 Applicable Equipment**

You must comply with all applicable requirements of 40 C.F.R. Part 264, Subpart BB, at 40 C.F.R. § 264.1050 through 40 C.F.R. § 264.1065, regarding air emission standards for equipment leaks. These requirements apply to equipment (hereinafter, applicable equipment) that: (i) is listed in 40 C.F.R. § 261.1031; 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 C.F.R. § 264.1050(b).

The equipment that is subject to Subpart BB requirements at this facility is considered "In light liquid service" as defined in 40 C.F.R. § 264.1031, and consists of pumps, open-ended valves or lines, and/or closed vent system and control devices. This permit does not allow you to use any other applicable equipment.

**II.A.2 Pumps in Light Liquid Service (40 C.F.R. § 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 C.F.R. § 264.1063(b), except: any pump that is (1) equipped with dual mechanical seal system satisfying the requirements of 40 C.F.R. 264.1052(d), (2) designated, as described in 40 C.F.R. § 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 C.F.R. § 264.1052(e), or (3) equipped with a closed vent system capable of capturing and transporting any leakage from the seal or seals to a control device that complies with the requirements of 40 C.F.R. § 264.1052(f).

**II.A.2.b** Each pump must 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 must be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 C.F.R. § 264.1059 - Standards: Delay of repair. The first attempt at repair must be made no later than five (5) calendar days after each leak is detected.



**II.A.2.e** You specified in the Part B Permit Application that two (2) pumps at the facility which are used to transfer hazardous waste with organic concentrations of at least 10 percent by weight are excluded from the requirement at 40 C.F.R. §§ 264.1052 to 264.1060 because they are in use less than 300 hours per calendar year, in accordance with 40 C.F.R. § 264.1050(f). In order to be excluded from those requirements under 40 C.F.R. § 264.1050(f), you must: (1) record the identification of such pumps, either by list or location (area or group), in a log; and (2) record the use of such pumps in hours daily in a log. (40 C.F.R. §§ 264.1050(f) and 264.1064(g)). The recorded log must be kept in the facility's operating record. At the end of each calendar year, you must determine the total amount of operating hours in that calendar year of each of two pumps which are used to transfer hazardous waste with organic concentrations of at least 10 percent by weight. The operating record must be available at the facility at all times for review by EPA, the state, local agencies, or their duly authorized representatives.

**II.A.3 Open-ended Valves or Lines (40 C.F.R. § 264.1056)**

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

**II.A.3.b** Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the hazardous waste stream end is closed before the second valve is closed.

**II.A.3.c** 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 must seal the open end at all other times.

**II.A.4 Delay of Repair (40 C.F.R. § 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 cases, repair of this equipment must occur before the end of the next hazardous waste management unit 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 percent 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 C.F.R. § 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 the provisions of 40 C.F.R. § 264.1059(e) are met.

**II.A.5 Closed-Vent Systems and Control Devices (40 C.F.R. § 264.1060)**

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

**II.B TEST METHODS AND PROCEDURES (40 C.F.R. § 264.1063)**

You must comply with the test methods and procedures requirements specified in 40 C.F.R. § 264.1063.

**II.C RECORDKEEPING AND REPORTING REQUIREMENTS (40 C.F.R. §§ 264.1064 and 264.1065)**

You must comply with the recordkeeping and reporting requirements of 40 C.F.R. § 264.1064 and 264.1065.

**SECTION III – AIR EMISSION STANDARDS FOR CONTAINERS, TANKS, AND MISCELLANEOUS UNIT (40 C.F.R. PART 264, SUBPART CC)**

You are permitted by the state RCRA permit to store hazardous waste in four (4) tanks (T #1, T #2, T #3, and T #4) which are located at the main building. The total capacity of these tanks is 12,550 gallons (T #1: 4,000 gallons, T #2: 1,500 gallons, T #3: 6,500 gallons, and T #4: 550 gallons). Each of these four tanks contain aqueous metal bearing hazardous waste. Your Part B Permit Application states that all hazardous waste entering these tanks has an average volatile organic (VO) concentration of less than 500 parts per million by weight (ppmw) at the point of waste origination. Section III.A below discusses the conditions and requirements for an exemption under 40 C.F.R. § 264.1082(c)(1), from the standards specified at 40 C.F.R §§ 264.1084 through 264.1087, for 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.

Hazardous waste is also stored in containers in the permitted thirty-two (32) container storage areas located at the annex and main buildings. These storage areas can store Level 1 and/or Level 2 containers. The combined maximum capacity of these container storage areas is 144,330 gallons. In drum storage area #14, which is one of thirty-two (32) containers storage areas, solvent pumping (i.e., transfer waste from tote and Level 1 Lab Pack Room containers to the tank-truck) and waste disperse processing (mixing the waste in the container through the drum dispenser) activities are being conducted.

Level 1 containers are also opened in the Lab Pack Room, which has its own closed vent system and a control device (carbon adsorption system) to transfer the contents into another Level 1 container for blending. The Lab Pack Room is not considered one of the 32 permitted container storage areas and thus is not included in calculating the facility's maximum capacity.

The facility also treats hazardous waste using a miscellaneous unit as defined in 40 C.F.R. Part 264, Subpart X.

You must comply with all applicable requirements of 40 C.F.R. § 264.1080 through 40 C.F.R. § 264.1090, regarding air emission standards for containers and tanks, including those applied to miscellaneous units under 40 C.F.R. § 264.601. All tanks not exempt from 40 C.F.R. §§ 264.1084 through 264.1087 in accordance with the provisions of 40 C.F.R. § 264.1082(c)(1) must be managed using the applicable standards at 40 C.F.R. § 264.1084.

You must not conduct waste stabilization processes, as defined in 40 C.F.R. § 265.1081, on any hazardous waste in containers and/or miscellaneous units that are subject to the requirements of Sections III.B, III.C and/or III.D of this permit, or in tanks that do not meet the requirements of Section III.A 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 C.F.R. § 265.1081.

### **III.A MAXIMUM VOLATILE ORGANIC CONCENTRATION FOR TANKS T#1, T#2, T#3, AND T#4**

The Permittee's Part B Permit Application states that the hazardous waste stored in tanks T#1, T#2, T#3, and T#4 at the facility contains an average volatile organic (VO) concentration at the point of waste origination of less than 500 ppmw.

40 C.F.R. § 264.1082(c)(1), in pertinent part, provides:

*(c) A tank, surface impoundment, or container is exempt from standards specified in § 264.1084 through § 264.1087 of this subpart, as applicable, provided that the waste management unit is one of the following:*

- (1) *A tank, surface impoundment, or container for which all hazardous waste entering the unit has an average VO concentration at the point of waste origination of less than 500 ppmw. The average VO concentration shall be determined using the procedures specified in § 264.1083(a) of this subpart. The owner or operator must review and update, as necessary, this determination at least once every 12 months following the date of the initial determination for the hazardous waste streams entering the unit.*

Among other requirements, 40 C.F.R. § 264.1083(a) specifies procedures for determining the average VO concentration at the point of waste origination for each hazardous waste placed in a waste management unit exempted under 40 C.F.R. § 264.1082, including the procedures at 40 C.F.R. § 265.1084(a)(2) through (a)(4); discusses the timing of the initial determination; and requires an owner and operator to perform a new waste determination whenever changes to the source generating the waste stream are reasonably likely to cause the average VO concentration of the hazardous waste to increase to a level that is equal to or greater than the applicable VO concentration limits specified in 40 C.F.R. § 264.1082.

For a unit to be exempt from the requirements of 40 C.F.R. §§ 264.1084 through 264.1087, you must meet all the requirements specified at 40 C.F.R. § 264.1082(c)(1) for that unit, including but not limited to making timely determinations, following the procedures specified at § 264.1083(a), and having an average VO concentration for hazardous waste at the point of waste origination below 500 ppmw.

**III.A.1** You are allowed to manage hazardous waste in tanks T#1, T#2, T#3, and T#4 in accordance with the state portion of the RCRA permit. All hazardous waste managed in each of these 4 tanks must contain an average VO concentration at the point of waste origination of less than 500 ppmw. The average VO concentration of a hazardous waste at the point of waste origination must be determined by direct measurement or approved method in accordance with the procedures specified in 40 C.F.R. §§ 264.1083(a) and 265.1084(a)(2) through (a)(4), as specified by 40 C.F.R. § 264.1082(c)(1).

**III.A.2** For any hazardous waste to be transferred from container or tank truck into the tanks (T#1, T#2, T#3, and T#4), the waste in container or tank truck shall contain an average VO concentration less than 500 ppmw at the point of waste origination.

**III.A.3** For each hazardous waste placed in these tanks (T#1, T#2, T#3, and T#4), you must review and update, as necessary, at least once every twelve months following the date of the initial determination, that the hazardous waste streams entering the unit have an average VO concentration at the point of waste origination of less than 500 ppmw using the procedures specified in 40 C.F.R. §§ 264.1083(a) and 265.1084(a)(2) through (a)(4), as specified in 40 C.F.R. § 264.1082(c)(1).

You must perform a new waste determination whenever changes to the source generating the waste stream are reasonably likely to cause the average VO concentration of the hazardous waste managed in these 4 tanks (T#1, T#2, T#3, and T#4) to increase to a level that is equal or greater than 500 ppmw. You must also review and update, as necessary, determinations under 40 C.F.R. § 264.1082(c)(1) at least once every twelve months following the date of the determination, as required by 40 C.F.R. § 264.1082(c)(1).

**III.A.4** You must comply with all applicable recordkeeping and reporting requirements described in 40 C.F.R. § 264.1089 and § 264.1090 for these 4 tanks (T#1, T#2, T#3, and T#4).

**III.A.5** For any proposed changes in your Part B Permit Application, which states that the hazardous waste processed in these four (4) tanks (T#1, T#2, T#3, and T#4) contains an average VO concentration at the point of waste origination of less than 500 ppmw, you must inform the EPA Region 5 RCRA program, in writing, about the changes no later than 30 calendar days prior to any such changes occurring. In the event that any of these four tanks specified in the Part B Permit Application process hazardous waste with an average VO concentration at the point of waste origination of 500 ppmw or greater, such tank(s) will be subject to and must comply with all applicable requirements specified in 40 C.F.R. § 264.1084, and you must submit a permit modification request providing for the application of 40 C.F.R. Part 264, Subpart CC to those hazardous waste tank(s).

### **III.B LEVEL 1 CONTAINER REQUIREMENTS**

You must manage containers that contain hazardous waste and that have a design capacity greater than 0.1 m<sup>3</sup> (26.4 gallons) and less than or equal to 0.46 m<sup>3</sup> (121 gallons) with Container Level 1 standards as described at 40 C.F.R. § 264.1086(c). When managing hazardous waste in Level 1 containers, you must comply with the following requirements:

**III.B.1** A Level 1 container must satisfy one of the following requirements (40 C.F.R. § 264.1086(e)(1)):

- (a) meet the applicable U.S. Department of Transportation (DOT) regulations as specified in 40 C.F.R. § 264.1086(f),
- (b) be equipped with a cover and closure devices as specified in 40 C.F.R. § 264.1086(c)(1)(ii), or
- (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 C.F.R. § 264.1086(c)(1)(iii).

Containers which do not meet DOT regulation specified in 40 C.F.R. § 264.1086(f) must be equipped with covers and closure devices suitable for the physical and chemical characteristics of hazardous waste in containers, for maintaining container integrity and minimizing exposure of hazardous waste to the atmosphere 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 fumes 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 must not chemically react to the hazardous waste. (40 C.F.R. § 264.1086(c)(2))

**III.B.2** All covers and closure devices must be in the closed position whenever hazardous waste is in a container. Opening of a closure device or cover is allowed if it meets the purposes and respective requirements specified in 40 C.F.R. § 264.1086(c)(3)(i) through (v).

**III.B.3** In transferring the waste from a Level 1 container to another Level 1 container in the Lab Pack Room, you must comply with the requirements specified in Condition III.B.2, above, or the requirements for Level 2 Containers as specified in Sections III.C and III.D.3, below.

**III.B.4** You must inspect all containers and their covers and closure devices in accordance with 40 C.F.R. § 264.1086(c)(4)(i) and (ii) and repair defects in accordance with 40 C.F.R. § 264.1086(c)(4)(iii).

**III.B.5** For any container with a capacity of 0.46 cubic meters (m<sup>3</sup>) or greater that you are managing under the Level 1 container standards in the Condition III.B and that does not meet the requirements in Condition III.B.1.(a), above, you must maintain at the facility a copy of the procedure that you used to determine that the container is not managing hazardous waste "In light material service", as defined in 40 C.F.R. § 265.1081. (40 C.F.R. § 264.1086(c)(5)).

### **III.C LEVEL 2 CONTAINER REQUIREMENTS**

You must manage containers that contain hazardous waste and that have a design capacity greater than 0.46 m<sup>3</sup> (121 gallons) with Container Level 2 standards as described at 40 C.F.R. § 264.1086(d). When storing hazardous waste in Level 2 containers you must comply with the following requirements:



**III.C.1** As specified in 40 C.F.R. § 264.1086(d)(1), a Level 2 container must be:

**III.C.1.a** A container that meets the applicable U.S. DOT regulations on packaging hazardous materials for transportation as specified in 40 C.F.R. § 264.1086(f); or

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

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

**III.C.2** You must transfer hazardous waste into or out of a container and/or mix the hazardous waste in the container in such a manner as to minimize exposure of the hazardous waste to the atmosphere, to the extent practical, as specified in 40 C.F.R. § 264.1086(d)(2).

**III.C.2.a** When transferring hazardous waste into or out of a container, including a tote from the Shredder#1 enclosure room, you must conduct such transferring activity by opening only the bung portion of the container. You must not open the entire top portion of a container to transfer hazardous waste into or out of a container at any time. During the transferring process, you must install a vapor and gas monitoring device (such as a photoionization detector (PID), a flame ionization detector (FID), or other similar unit) to continuously monitor volatile organic compounds in the air emitted from the transferring process from the container. You must set the alarm on the monitoring device to the appropriate level to protect the worker safety and to minimize the release of such organic compounds to the atmosphere. You must record the volatile organic emissions from the transferring process.

**III.C.2.b** For any transfer of liquid, semi-liquid, and/or viscous non-pumpable hazardous waste from containers (i.e., tote from the Shredder #1 enclosure room), you must capture the vapors generated from such transfer activities through a large vent pipe placed as close as possible to the transfer area to be routed to the vapor control device. You must also capture the vapors generated from the drum dispenser, which is used to mix semi-solid waste sufficiently to make them pumpable, through a large vent pipe placed as close as possible to the transfer area to be routed to the vapor control device. For the large vent pipe placed over the top opening of the tote and the drum dispenser during the hazardous waste transfer and/or mixing, you must conduct a smoke test, a velocity test, or any other relevant test to demonstrate that all of the generated vapors from the transfer and/or mixing activities are captured by the

large vent pipe. Such test must be conducted annually, and the results of the test must be retained at the site to be available at the facility at all times for review by EPA, the state, local agencies, or their duly authorized representatives. You must comply with the requirements specified in Conditions III.D.3, below, for the closed vent system and carbon adsorption system.

**III.C.3** Whenever a hazardous waste is in a container using Level 2 controls, you must: (1) install all covers and closure devices for the container; and (2) secure and maintain each closure device in the closed position except during filling and removal operations as specified in 40 C.F.R. § 264.1086(d)(3). Opening of a closure device or cover is allowed if it meets the purposes and operates as provided in 40 C.F.R. § 264.1086(d)(3)(i) through (v).

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

### **III.D MISCELLANEOUS UNIT (40 C.F.R. PART 264, SUBPART X)**

The Permittee's Part B Permit Application indicates that the hazardous waste is processed in Shredder #1, which is classified as a miscellaneous unit (Subpart X unit). Since Shredder #1 can be considered a tank-like miscellaneous unit, it is appropriate to apply the requirements of 40 C.F.R. Part 264, Subpart CC to that unit.

The following components of Shredder #1 are regulated under this section: (1) the Shredder's bottom container, which collects liquid hazardous waste; (2) the conveyor, and; (3) the compactor.

You must control air pollutant emissions from the Subpart X units located in the main building to comply with 40 C.F.R. § 264.601. The emission control must 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 must comply with the following requirements:

**III.D.1 a** Shredder #1 must be designed, operated and maintained in accordance with the operational specifications described in the Part B Permit Application. 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.1.b** During the shredding process, the compactor located inside of Shredder #1 must also be operated in order to render the shredded and compacted materials from Shredder #1 as RCRA-empty waste.

**III.D.2** The Shredder #1 enclosure consists of a room (enclosure room) with four walls, a ceiling, a floor, a door opening, an opening with a conveyer belt for loading Shredder #1, a garage door, and an opening through which shredded and compacted waste from Shredder #1 can be ejected from the enclosure room. The enclosure room must comply with the following requirements:

**III.D.2.a** You must 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 C.F.R. § 52.741 (Procedure T). You must perform the verification procedure for the enclosure room as specified in Section 5.0 of such Procedure T annually. Before you conduct the annual Procedure T test, you must 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. (40 C.F.R. § 264.1084((i)(1)).

**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 must 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. The doors may be open during an emergency or malfunction, but only as long as necessary to allow authorized personnel 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 must prepare written documentation accurately recording all results of the procedure. All such documentation must be maintained as part of the facility's operating record for at least 3 years.

**III.D.2.d** During the shredding process, you must install a vapor and gas monitoring device (such as a photoionization detector (PID), a flame ionization detector (FID), or other similar unit) to continuously monitor volatile organic compounds in the air emitted from the shredding process in the enclosure where the Shredder #1 is located. You must set the alarm on the monitoring device to the appropriate level to protect the worker safety and to minimize the release of such organic compounds to the atmosphere.

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

**III.D.3.a** The closed vent system must 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) must comply with the requirements as stipulated in 40 C.F.R. § 264.1087. The closed vent system must meet the requirements of 40 C.F.R. § 264.1033(k)(2).

**III.D.3.c** The closed vent system and carbon adsorption system must be operated and negative pressure must 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 must 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 vapors in the enclosure room have been vented into the vent duct and to the control device. You must determine the necessary waiting time based on the exhaust fan capacity, volume of the enclosure room including vent duct, and other pertinent data of the vapor. Such determination and end results of any calculation must be documented in writing and retained at the facility.

**III.D.3.d** The carbon adsorption system must have a minimum removal efficiency of 95% by weight in accordance with 40 C.F.R. § 264.1087(c)(1)(i). You must demonstrate that the carbon adsorption system achieves this performance standard as specified in 40 C.F.R. § 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 must 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 C.F.R. § 264.1035(b)(4)(iii)(G), whichever is longer. The carbon adsorption system must be monitored by a photoionization detector or other suitable instrument that can detect carbon breakthrough. You must calibrate, inspect and maintain the monitoring device as necessary to assure proper function and in accordance with the manufacturer's specifications. You must replace the existing carbon in the control device with fresh carbon immediately when carbon breakthrough is indicated. (40 C.F.R. §§ 264.1087(c)(3)(i) and 264.1033(h)(1)).

You must maintain a carbon adsorption maintenance log at the site. Such maintenance log must include, but must 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 must be maintained as part of the facility's operating record.

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

**III.D.3.g** The closed vent system must 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 C.F.R. § 264.1087(b)(3).

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

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

**III.D.4** You must repair each defect detected during an inspection performed in accordance with Condition III.D.3.i, according to requirements specified in 40 C.F.R. § 264.1084(k) and 40 C.F.R. § 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 C.F.R. § 264.1089, including but not limited to 40 C.F.R. § 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 C.F.R. § 264.1084(i)), the closed vent system, and the carbon adsorption system described in this Section III in the manner described in 40 C.F.R. § 264.1089, including 40 C.F.R. § 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 C.F.R. § 264.1090(c) and (d). Such reports must 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 C.F.R. § 264.1090(b).





ACKNOWLEDGEMENT OF NOTIFICATION  
OF HAZARDOUS WASTE ACTIVITY

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.

EPA I.D. NUMBER

OH0063377010

REACKNOWLEDGEMENT

ENVIRONMENTAL ENTERPRISES INCORPORA  
10147 SPRINGFIELD PIKE  
CINCINNATI, OH 45215

INSTALLATION ADDRESS

4650 SPRING GROVE AVE  
CINCINNATI OH 45232



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

August 28, 2020

Daniel J. McCabe  
Environmental Enterprises, Inc.  
4650 Spring Grove Ave.  
Cincinnati, Ohio 45232

**Re: Environmental Enterprises, Inc.  
Permit - Intermediate  
Correspondence  
RCRA C - Hazardous Waste  
Hamilton County  
OHD083377010**

**Subject: Renewed Ohio Hazardous Waste Facility Installation and Operation Permit**

Dear Mr. McCabe:

On August 27, 2020, Ohio EPA renewed the Ohio Hazardous Waste Facility Installation and Operation Permit (Permit) for Environmental Enterprises, Inc. (EEI). The Permit became effective on August 27, 2020, and will expire ten (10) years from this effective date.

You are hereby notified that this action of the Director of Ohio EPA (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 made payable to "Treasurer, State of Ohio." The Commission, in its discretion, may reduce the fee if by affidavit it is demonstrated 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  
30 East Broad St., 4<sup>th</sup> Floor  
Columbus, Ohio 43215

Environmental Enterprises, Inc.

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The record related to this action can be retrieved from the Agency's eDocument Search web site: <http://edocpub.epa.ohio.gov/publicportal/edochome.aspx>. Click **Show Advanced** and then search under the document type of **Permit – Intermediate**. Refine the search using the facility's RCRA ID number (Secondary ID) which is noted in the RE: block above.

If you have any questions concerning compliance, please contact Jeff Smith of Ohio EPA's Southwest District Office at (937) 285-6070.

Sincerely,



Halee Smith, Environmental Specialist 2  
Division of Environmental Response and Revitalization.

cc: Brad Mitchell, DERR, CO  
Halee Smith, DERR, CO  
Jeff Smith, DERR, SWDO  
George Strobel, DERR, SWDO  
Randy Kirkland, DERR, SWDO  
Heather Lauer, PIC  
Sarah Miles, Legal

**ENVIRONMENTAL ENTERPRISES, INC.  
PERMITTED WASTE CODES**

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

**JUN 11 2018**

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

Re: Final Federal TSCA PCB Commercial Storage Approval,  
Environmental Enterprises Inc.  
Cincinnati, Ohio  
OHD 083 377 010

Dear Mr. McCabe:

Enclosed is the final federal Toxic Substances Control Act (TSCA) polychlorinated biphenyls (PCBs) commercial storage approval for Environmental Enterprises Inc.'s facility located at 4650 Spring Grove Road, Cincinnati, Ohio 45232. The approval is a renewal of a PCB commercial storage approval issued pursuant to 40 C.F.R. § 761.65.

On March 30, 2018, the U.S. Environmental Protection Agency issued the draft federal TSCA approval for public comment. The draft Federal TSCA approval was publicly noticed in "The Cincinnati Enquirer" on March 30, 2018. A copy of the draft federal TSCA approval was available for review at the Public Library of Cincinnati & Hamilton County, Northside Branch, 4219 Hamilton Ave., Cincinnati, Ohio 45223 and on the EPA website. The public comment period extended from March 30, 2018 to May 1, 2018 and EPA received no comments or meeting requests on the draft approval. As a result, EPA is now issuing Environmental Enterprises Inc. a final TSCA approval.

This approval may be withdrawn, or further conditions may be added to it at any time, if EPA has reason to believe that operation of the storage facility represents an unreasonable risk of injury to human health or the environment. Withdrawal of this authorization or the imposition of further conditions may also result from future EPA rulemaking or development of guidance with respect to PCBs. Moreover, violation of any conditions included as part of this authorization may subject Environmental Enterprises Inc. to an enforcement action and/or the termination of this approval.

It is the responsibility of you and your company, Environmental Enterprises Inc., to ensure that all applicable provisions of TSCA and the federal PCB regulations are followed. Violation of any of the applicable provisions may be cause for rescission of this approval. Furthermore, this approval does not relieve Environmental Enterprises Inc. of the responsibility to comply with all other Federal, State and local regulations and ordinances for transportation, siting, operation and maintenance of its facility.

EPA reserves the right for its authorized representatives to observe Environmental Enterprises Inc. storage activities and inspect records that the facility is required to maintain under the federal PCB regulations and this approval, during normal operation and at other reasonable times.

If you have questions concerning the final federal TSCA approval, please contact Jae Lee, of my staff, at (312) 886-3781.

Sincerely,

A handwritten signature in cursive script that reads "Michael D. Harris".

Michael D. Harris  
Acting Division Director  
Land and Chemicals Division

Enclosures

cc: Bradley Mitchell, Ohio EPA

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

<b>In the Matter of:</b>	)	
	)	
<b>Environmental Enterprises Inc.</b>	)	<b>Approval to Commercially Store</b>
<b>4650 Spring Grove Avenue</b>	)	<b>Polychlorinated Biphenyls (PCBs) Wastes</b>
<b>Cincinnati, Ohio 45232</b>	)	<b>Pursuant to 40 C.F.R. § 761.65(d)</b>
<b>OHD 083 377 010</b>	)	
<hr/>	)	

AUTHORITY

This Approval to Commercially Store Polychlorinated Biphenyls (PCBs) Waste is issued pursuant to section 6(e)(1) of the Toxic Substances Control Act (TSCA), 15 United States Code (U.S.C.) § 2605(e)(1), and 40 Code of Federal Regulations (C.F.R.) Part 761 (Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions (PCB Regulation)).

BACKGROUND

Section 6(e)(1)(A) of TSCA, 15 U.S.C. § 2605(e)(1)(A), requires that the United States Environmental Protection Agency (EPA) promulgate rules for the disposal of PCBs. Rules implementing TSCA section 6(e) were published in the May 31, 1979, Federal Register (44 Fed. Reg. 31,542) and recodified in the May 6, 1982, Federal Register (47 Fed. Reg. 19,527). 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 Fed. Reg. 52,746).

Environmental Enterprises Inc. (EEI) is applying for permission from EPA Region 5 to renew an existing EPA Approval, issued pursuant to 40 C.F.R. § 761.65(d) to commercially store PCBs and PCB items with concentrations greater than 50 parts per million (ppm) at their facility in Cincinnati, Ohio. The PCBs and PCB Items that will be stored include capacitors, ballasts, oil, contaminated soils, debris, paint solvents, and transformers. EEI operates as a commercial storage facility.

On September 21, 1995, EPA issued an Approval to Commercially Store PCBs wastes to EEI with a ten-year expiration date. On September 30, 2005, EEI submitted a notice of intent to continue the approval to store PCBs wastes. On March 20, 2012, EPA sent a letter to EEI confirming receipt of the notice of intent to continue storing PCBs wastes and requested EEI to submit an updated Application. EPA also confirmed that EEI could continue operating as a PCB commercial storage facility beyond the expiration date of the approval until EPA completed its



review of the submitted information and made a final determination regarding whether the approval was to be renewed. On August 1, 2012, EEI submitted a draft Application, and on September 6, 2013, EEI submitted a final Application. After a technical adequacy review of the updated Application, the EPA sent a Notice of Deficiencies (NOD) on May 25, 2017, notifying EEI of deficiencies in the Application. In response to the NOD, the facility submitted revised pages of the Application and additional information on June 22, 2017. After further technical review of the revised Application and the subsequent information submitted in support of the Application, EPA has determined that the final revised Application is in compliance with the regulatory requirements, outlined at 40 C.F.R. § 761.65, Storage for Disposal. The updated June 22, 2017 Application from EEI is the basis for this Approval.

### APPLICABLE REGULATIONS

This Approval is developed in accordance with the applicable requirements of the PCB Regulations. The rules applicable to the storage for disposal of PCBs at concentrations of 50 ppm or greater and PCB Items with PCB concentrations of 50 ppm or greater are codified at 40 C.F.R. §§ 761.65 (Storage for disposal) and 761.180 (Records and monitoring). Such rules require, among other things, that commercial storers of PCB waste, storing regulated PCB containing material in quantities greater than 500 gallons, obtain a written approval issued by the Regional Administrator for the region in which the storage facility is located. *See* 40 C.F.R. §§ 761.3 and 761.65(d). On July 28, 2014, this authority of the Regional Administrator was delegated to the Director, Land and Chemicals Division, EPA Region 5.

### DEFINITIONS

All the terms and abbreviations used in this Approval shall have the meanings as defined in 40 C.F.R. § 761.3 unless the context clearly indicates otherwise or unless the term is defined below for the purposes of this Approval.

“Approval” means EPA’s initial approval of the EEI’s Application, and any subsequent EPA approved written modifications thereto.

“Application” and “EEI’s Application” mean EEI’s Application dated June 22, 2017, and any subsequent EEI’s Application that EPA approves in writing as a modification to this Approval.

“Delegate” means the Director, Land and Chemicals Division, EPA Region 5.

“Director” means the Director, Land and Chemicals Division, EPA Region 5.

“Electrical equipment” means assembled or disassembled transformers, capacitors, circuit breakers, switches, bushings, voltage regulators and reclosers.

“Environmental Enterprises Inc.” or “EEI” means Environmental Enterprises Inc., the company which owns and operates a PCB commercial storage facility located at 4650 Spring Grove Avenue, Cincinnati, Ohio, and which is approved to commercially store PCB waste under this Approval.

“Environmental Enterprises Inc. Facility”, “EEI Facility” and “Facility” mean the PCB commercial storage facility located at 4650 Spring Grove Avenue, Cincinnati, Ohio.

“EPA” means EPA Region 5.

“PCB Items” means any PCB article, PCB article container, PCB container or PCB equipment, as each term is defined at 40 C.F.R. § 761.3.

“PCB Waste(s)” means those PCBs and PCB Items that are subject to the disposal requirements of 40 C.F.R. Part 761 Subpart D.

“Regional Administrator” means the Regional Administrator, EPA Region 5.

APPROVAL

EEI submitted an Application to EPA to commercially store PCBs and PCB Items for disposal at the EEI Facility, 4650 Spring Grove Avenue, Cincinnati, Ohio. Upon review of EEI's Application dated June 22, 2017, EPA has determined that all the requirements set forth in 40 C.F.R. § 761.65(d)(2)(i)-(vii) have been met. Specifically, the Application indicates that EEI's operations, storage facility, employee qualifications, closure plans, and financial plans for closure satisfy regulatory requirements. EPA approves EEI's Application to commercially store PCBs and PCB Items for disposal at the EEI Facility.

This Approval shall become effective the date the Regional Administrator or his or her delegate signs the Approval and shall expire 10 years from such date, unless suspended, revoked or terminated in accordance with the Approval's provisions, or otherwise authorized under applicable law.

This Approval does not relieve EEI from compliance with all applicable federal, state, and local regulatory requirements, including the federal PCB Regulations at 40 C.F.R. Part 761.

Michael D. Harris  
Michael D. Harris  
Acting Division Director  
Land and Chemicals Division  
U.S. Environmental Protection Agency  
Region 5

Date: 6/08/2018

Environmental Enterprises Inc.  
Cincinnati, Ohio

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## I. STANDARD CONDITIONS

### A. Effect of Approval

EEI may store PCBs and PCB Items in accordance with these Approval Conditions and the federal PCB Regulations at 40 C.F.R. Part 761. Any storage of PCBs or PCB items not authorized in this Approval is prohibited.

Issuance of this Approval does not convey property rights of any part or any exclusive privilege, nor does it authorize any injury to persons such as EEI's employees, agents or contractors, any property damage, any invasion of other private rights or any infringement of state or local laws or regulations.

Compliance with these Approval Conditions does not establish a defense to any other law that provides protection from any unreasonable risk to public health and the environment, including the federal PCB Regulations at 40 C.F.R. Part 761.

This Approval does not relieve EEI from compliance with all applicable federal, state and local regulatory requirements, including the federal PCB Regulations at 40 C.F.R. Part 761.

### B. Approval Suspension/Revocation

Departure from these Approval Conditions, the approved Application or approved modification(s) to this Approval, the federal PCB Regulations, or any other applicable federal, state, or local requirement without a prior written approval by EPA may result in the immediate suspension of this Approval or the commencement of proceedings to revoke this Approval and/or any other appropriate enforcement actions under any or all applicable statutes and regulations.

This Approval may be suspended or revoked at any time by EPA once the Director determines that the continued operation of EEI presents an unreasonable risk to human health or the environment.

### C. Approval Compliance

EEI must comply and operate the Facility in accordance with section 6(e) of TSCA, 15 U.S.C § 2605(e), and the PCB Regulations, including the requirements of the PCB Spill Cleanup Policy codified at 40 C.F.R. Part 761, Subpart G.

This Approval is based on the facts, representations, and certifications made by EEI in its Application dated June 27, 2017 (incorporated herein by reference). In the event that these Approval Conditions are inconsistent with the final approved Application, EEI must abide by

the Approval Conditions stated herein.

D. Severability

The provisions of this Approval are severable, and if any provision of this Approval or if the Application of any provision of this Approval is held invalid, the remainder of this Approval shall not be affected thereby.

E. Approval Renewal

To continue the commercial storage of PCBs and PCB Items granted by this Approval after the expiration date of this Approval, EEI must notify EPA by written notice of intention to continue the Approval at least 180 days, but not more than 270 days prior to the expiration date of this Approval.

The EPA may require EEI to submit additional information in connection with the renewal of this Approval. EPA shall review the submitted information and determine if this Approval is to be renewed.

F. Approval Expiration

This Approval shall expire 10 (ten) years from the date of issuance of this Approval. This Approval and its conditions herein will remain in effect beyond the Approval expiration date if EEI has submitted a timely, complete and adequate notice of intent to continue the Approval and, through no fault of EEI, the Regional Administrator or his or her designee has not issued an Approval renewal.

G. Approval Modification

EEI must notify EPA in writing of any intended modification of this Approval or EEI's final approved Application. A major modification is defined as any change to the storage areas, the maximum PCB storage inventory, the closure plan, closure cost estimates, the financial plan for closure, or any other changes which affect overall performance or environmental impact. A major modification to this Approval or the final Application shall be modified only upon the written approval of the Regional Administrator or his or her designee.

A minor modification is defined as administrative and informational changes, correction to typographical errors, changes to conform to agency guidance or regulations, or any other change which does not affect overall performance or environmental impact. A minor modification to this Approval or the final Application shall be modified upon the written concurrence of the Chief of the RCRA Branch of EPA Region 5.



H. Entry and Inspection

EEI must allow EPA-authorized representative(s) to, at reasonable times:

1. Inspect EEI's property to determine compliance with this Approval or the federal PCB Regulations;
2. Inspect any records that must be kept relative to this Approval or the federal PCB Regulations;
3. Take sample(s) for the purpose of assessing this Approval or the federal PCB Regulations; and
4. Inspect EEI's activities relative to this Approval or the federal PCB Regulations.

I. Change in Ownership

EPA will recognize the transfer of this Approval to a new owner/operator if all of the following conditions are met by the date of transfer:

1. The transferee demonstrates it has established financial assurance for closure of the facility pursuant to 40 C.F.R. § 761.65(g) using a mechanism effective as of the date of transfer so that there will be no lapse in financial assurance for closure of the transferred facility.
2. The transferee submits a new and complete Application for final storage approval, including all of the elements listed in 40 C.F.R. § 761.65(d), and the transferee has resolved any deficiencies (e.g. technical operations, closure plans, cost estimates, etc.) that EPA identifies in its Application.
3. The transferee submits a signed and notarized affidavit which states that the transferee shall comply with all the terms and conditions of this Approval.

Failure by EEI or the transferee to comply with any of the provisions of this condition shall render this Approval null and void.

J. Inapplicability of Paperwork Reduction Act

Any and all information required to be maintained or submitted pursuant to this Approval is not subject to the Paperwork Reduction Act of 1980, 44 U.S.C. §§ 3501-3520, because it is information collected by EPA from a specific individual or entity for the purpose of assuring compliance with this Approval.

## II. GENERAL FACILITY CONDITIONS

### A. Operation of Facility

EEI must maintain and operate the facility to prevent fire, explosion, or releases of PCBs to air, soil, ground water or surface water.

### B. Sampling/Analysis

During any sampling or analysis of PCBs at the EEI Facility, EEI must follow the procedures described in their Application or the EPA Field Manual for "Grid Sampling of PCB Sampling of PCB Spill Sites to Verify Cleanup" or 40 C.F.R. § 761 Subparts N, O, and/or P, as applicable.

PCB levels for liquid and non-liquid samples must be reported as total PCBs calculated by comparison to the relevant Aroclor standards.

### C. Security

EEI must maintain the security system defined in their Application and ensure that the warehouse containing the PCB storage area is locked when the facility is closed or unmanned to restrict public access without an escort by EEI's personnel.

### D. Personnel Training

1. EEI must ensure through documented training, that personnel, who are directly involved with handling PCBs and PCB items, are familiar with the requirements of this approval, and the regulatory requirements under 40 C.F.R. Part 761.
2. Training for new employees involved with the managing PCBs shall be completed within 30 days of employment.

### E. Health and Safety

EEI's employees working in the PCB commercial storage area shall wear or use protective clothing or equipment to protect against dermal contact or inhalation of PCBs or materials containing PCBs, as described in Section F-4 of their Application.

EEI must ensure compliance with the applicable health and safety standards, as required by federal, state and local regulations and ordinances.

F. Spills

1. If in the course of operation, there is a spill or release of one pound or more of pure PCBs (a reportable quantity (RQ) as defined under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), 40 C.F.R. Part 302, Designation Reportable Quantities and Notification), EEI must notify the National Response Center at (800) 424-8802, and EPA, Region 5, PCB Coordinator. Releases or spills of PCBs below the RQ which pose a potential for significant exposure to humans, animals, or the environment, must be reported to EPA, Region 5, PCB Coordinator, or the Emergency Response Section at (312) 353-2318.
2. A written summary report about this incident must be submitted to EPA within five business days following the incident. When EPA requests a detailed report on the incident, this report must be submitted to EPA within 15 business days following the request. The detailed report must include, but not be limited to, a description of the spill, cleanup activities, and changes in the EEI's operations to prevent such spills in the future (including any intended modifications to this Approval).
3. Cleanup of PCB spills must begin immediately pursuant to 40 C.F.R. Part 761, Subpart G, PCB Spill Cleanup Policy, or 40 C.F.R. § 761.61, PCB Remediation Waste, as applicable. The cleanup standards in the PCB Spill Cleanup Policy may only be applied for spills of PCBs that are less than 72 hours old.
4. Any debris or solid wastes generated as a result of clean up or decontamination of a PCB spill or release must be disposed of in a facility approved to dispose of PCBs under 40 C.F.R. § 761.60 or 761.61, as applicable.

G. Location Standard

EEI must notify EPA, Region 5, PCB Coordinator immediately upon discovery that the site has been re-designated as being in a 100-year flood plain.

H. Emergency Procedures

EEI must, without delay, implement the appropriate measures, as described in EEI's Procedure to Prevent Hazards and Contingency Plan included in the approved Application, whenever there is a fire or any PCB related emergency which could threaten human health or the environment. This plan must be maintained at the facility. The local police and fire departments, hospital and state and local emergency response teams must be informed of facility operations and emergency response plans submitted to these entities as required by them. In such an emergency, EEI must notify the EPA Region 5 PCB Coordinator and the Emergency Response Section at (312) 353-2318.

This plan must be immediately amended by EEI upon any plan failure in an emergency, change of emergency equipment, change within the facility or with personnel, or any request by EPA Region 5, RCRA/TSCA Programs Section, and promptly submitted to the EPA Region 5, RCRA/TSCA Programs Section.

I. Recordkeeping and Reporting

1. All reports and other information requested by EPA must be signed by the facility manager.
2. EEI must maintain the records of daily storage inspections and routine sampling, as specified in Condition III.H and I of this Approval, and these records must be made available to EPA upon request.
3. EEI must retain all records required by this Approval and the federal PCB Regulations at 40 C.F.R. Part 761 during the course of any unresolved enforcement action regarding the facility or upon request by the Regional Administrator or his or her designee, notwithstanding any other provision of this Approval or the federal PCB Regulations at 40 C.F.R. Part 761.
4. EEI shall maintain records and submit annual reports to EPA as required by the PCB Regulations at 40 C.F.R. § 761.180(b). Annual document logs and reports shall be maintained at the facility for at least 3 years after the facility is no longer used for the storage of PCBs and PCB Items.

J. Closure and Financial Requirements

1. EEI must maintain a closure plan and financial assurance for closure, in accordance with 40 C.F.R. § 761.65(e), (f) and (g), respectively. The facility has filed with the Regional Administrator a closure plan and financial assurance for closure in compliance with the regulatory requirements.
2. When the Regional Administrator or his or her designee approves a modification to the facility's closure plan and that modification increases the cost of closure, EEI must revise the closure cost estimate and the financial assurance mechanism, if applicable, no later than 30 days after the modification is approved.
3. During the active life of the PCB storage operations, EEI must annually adjust the closure cost estimate for inflation and for changes beyond control of EEI which may affect disposal costs.

4. EEI must submit proof of financial assurance for closure to EPA annually. If EPA determines that the amount of financial assurance is inadequate to ensure that the storage of PCBs and PCB Items does not present an unreasonable risk of injury to health or the environment from PCBs, EEI must obtain additional financial assurance funding. Failure to do so will result in termination of EEI's authority to commercially store PCBs and may subject EEI to civil or criminal penalties under TSCA.
5. EEI shall notify EPA Regional Administrator in writing at least 60 days prior to the date on which closure of the PCB storage is expected to begin in accordance with 40 C.F.R. § 761.65(e)(6)(i). EPA may request a copy of a final closure plan from EEI at this time and may require modifications to the closure plan.

### III. PCB STORAGE MANAGEMENT

#### A. Storage Area

All PCBs and PCB Items must be stored in the approved storage areas, as identified below in Condition III.C and in the curbed and lined area of the EEI Facility as specified in the final approved Application.

#### B. Design Requirements of Storage Area

The PCB storage area must be maintained in accordance with 40 C.F.R. § 761.65(b)(1) and the final approved Application.

#### C. Maximum PCB Storage

##### 1. PCB Storage Area:

At any given time, EEI shall store no more than a combined total of 4,684 gallons of PCBs and PCB Items in the curbed PCB storage area identified in the approved Application and as indicated in the following table.

PCB Storage Area	Type of Waste	Maximum Volume
Curbed PCB Storage Area	<ul style="list-style-type: none"><li>PCB Articles (transformers, capacitors, ballasts, and other PCB equipment)</li><li>PCB oil, PCB debris, and PCB contaminated soils, paint solvents contained in 55-gallon, 85-gallon, 110-gallon drums, pails, and/or totes</li></ul>	4,684 gallons
	Total:	4,684 gallons

EEI must maintain updated PCB inventories to ensure that the maximum PCB storage inventories, above, are not exceeded.

EEI must maintain the PCB storage area to ensure that any cracks or wearing of the epoxy sealant are repaired as needed.



2. Transfer/Transit Areas:

EEI shall store PCB Items in vehicles in transportation related areas (such as a roadway or parking area) at the EEI Facility for no more than 10 days from the date of its receipt at EEI.

3. PCB Items must be labeled with the date they were removed from service for disposal. Alternatively, containers in which the PCB Items are consolidated (i.e. 55-gallon drums) may be labeled by EEI with the removal-from-service date provided the container is dated with the date the first contained item was removed from service. When containers are labeled in this manner, each individual PCB Item contained is considered to be covered by, and subject to, the date on the container.

D. Containers

PCB containers used by EEI for storage of PCB items, liquid PCBs, and non-liquid PCBs must be no greater than 375-gallon containers. The PCB containers stored in the PCB Storage Area must be in compliance with the requirements of 40 C.F.R. § 761.65(c)(6) or the Department of Transportation Hazardous Materials Regulations at 49 C.F.R. Parts 171-180.

The containers must be marked in the PCB storage areas and shipping/receiving areas so that the required information on the marks, including dates of receipt and dates removed from service for disposal, are clearly and entirely visible at all times.

E. Aisle Space Requirement

Aisle space within the PCB storage areas and within the shipping/receiving areas must be maintained at all times to allow the unobstructed movement of equipment which handles PCB items, personnel, fire protection equipment, spill control equipment and decontamination equipment.

F. Pallet Use and Drum Layer Limit

Pallets may be used to store PCB containers in the PCB storage areas. EEI may stack pallets of drums (55-gallon capacities) containing liquid or non-liquid PCBs. If drums containing PCBs are stacked, EEI shall not stack pallets of drums over two layers. In addition: 1) a pallet shall be used beneath each layer of drums, 2) a maximum of four drums will be stored on a pallet, and 3) the bottom pallet shall always contain four drums before the second level of drums and pallet are added. If any PCB containers are placed on a pallet, they shall be within the pallet edges.

G. Management of PCB Items

PCB containers and PCB articles at EEI must always be closed during storage, except when adding and removing their contents, and they must not be opened, handled or stored in a manner which may damage them or cause them to leak.

If any PCB container or PCB article is defective, EEI must immediately transfer the PCB waste in the container to another container that is properly marked and structurally sound.

H. Inspection Requirement

1. All PCB items and PCB containers in the PCB storage areas, shipping/receiving areas, and transfer/transit areas must be inspected for leaks at least once each day. Any leaking PCB item and its contents must be transferred immediately to properly marked non-leaking containers. Leaked or spilled materials must be instantly and properly cleaned up in accordance with Condition II.F.3 of this Approval, and the PCB contaminated materials must be adequately disposed of in accordance with 40 C.F.R. § 761.60 or 761.61, as applicable.
2. The integrity of the floor and curbing of the PCB storage area must be inspected daily.
3. The inspections conducted each day shall be recorded. Such inspections can be performed by visually, by video tapping, and/or by using monitoring device. The results of such inspections shall be recorded and stored at the site.
4. All safety equipment shall be inspected once per week.

I. Routine Sampling Requirement

EEI must monitor surface contamination outside the PCB storage area on a routine basis in accordance with the Sampling Plan of the Application. The frequency for routine wipe sampling is once per month.

## **RESPONSE SUMMARY**

### **RESPONSE TO COMMENTS ON THE DRAFT TSCA APPROVAL FOR Environmental Enterprises Inc., Cincinnati, Ohio OHD 083 377 010**

No comments were received by U.S. Environmental Protection Agency on the draft TSCA approval during the public comment period (from March 30, 2018 to May 1, 2018). Therefore, no conditions of the draft approval were changed in the final approval, with the exception of changes necessary to identify that the approval has been finalized.

# Public Notice: Environmental Enterprises Inc.

**This serves as a public notice for the Renewal of a PCB Commercial Storage Facility Approval for Environmental Enterprises Inc. located at 4650 Spring Grove Road, Cincinnati, Ohio.**

On this page:

- [Background](#)
  - [Facility, Repository and Contact Information](#)
  - [Important Dates](#)
  - [Supporting Documents](#)
  - [Comments](#)
- 

## Background

Environmental Enterprises Inc. (EEI) would be allowed to continue operating as a commercial polychlorinated biphenyl (PCB) storage facility under the Toxic Substances Control Act (TSCA) if an approval renewal is granted from the U.S. Environmental Protection Agency (EPA).

EEI operates as a commercial storage facility. EEI only stores PCB wastes. EEI does not treat PCB waste at the site. PCB wastes are shipped off-site as received. EPA issued a PCB commercial storage approval to EEI on September 21, 1995, with a 10-year expiration date. EEI sent a letter to EPA with a notice of intent to continue operating as a PCB commercial storage facility along with an updated application. EPA allowed EEI to continue operating as a PCB commercial storer under their current approval until the revised application could be reviewed and a new approval issued.

The EPA Approval would allow EEI to continue storing up to 4,684 gallons of PCBs in Articles (transformers, capacitors, ballasts, and other PCB equipment); PCB article containers; and PCB oil, PCB debris, and PCB contaminated soils, paint solvents contained in 55-gallon drums or equivalent at their facility in Cincinnati, Ohio. The quantity and types of PCBs to be stored at the facility are the same as in the current approval.

EPA has determined the company has shown the operation does not present a risk to human health or the environment. The approval outlines specific conditions under which EEI must operate the facility.

EPA is taking comments from the public on the proposed approval for EEI located at 4650 Spring Grove Road, Cincinnati, Ohio. The draft PCB commercial storage approval is open for public comment from March 30 to May 1, 2018. Copies of the draft PCB commercial storage

approval and supporting documents (i.e., EEI application) are located at the Public Library of Cincinnati & Hamilton County, Northside Branch, 4219 Hamilton Ave., Cincinnati, Ohio 45223. Comments are being accepted on the draft approval. Before a final decision is made, EPA will review and respond to any and all comments from the public on the proposed approval for EEI located at 4650 Spring Grove Road, Cincinnati, Ohio. You may request that EPA hold a public hearing about this approval. At a hearing, you will have an opportunity to submit written comments, ask questions, make statements, and otherwise discuss any concerns about the approval with EPA staff. If a public hearing is to be held, EPA will make a separate announcement of the date, time, and location of that hearing/meeting, thirty (30) days in advance.

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## Facility, Repository and Contact Information

### General Facility Information

<b>City:</b>	Cincinnati
<b>State:</b>	Ohio
<b>County:</b>	Hamilton
<b>EPA ID #:</b>	OHD 083 377 010
<b>Alias(es):</b>	N/A

### Repository Information

<b>Name:</b>	Public Library of Cincinnati & Hamilton County Northside Branch
--------------	--

Street Address:	4219 Hamilton Ave. Cincinnati, Ohio 45223
City/State:	Cincinnati, Ohio
Opening Hours:	Noon- 8:00 PM (Monday and Tuesday) Noon- 6:00 PM (Wednesday and Thursday) 10:00 AM – 6:00 PM (Friday and Saturday) Closed (Sunday)

### Contact Information

EPA Public Affairs Specialist:  
Rafael P. Gonzalez  
Gonzalez.rafaelp@epa.gov  
800-621-8431, Ext. 60269  
8:30 a.m. – 4:30 p.m., weekdays

TSCA Project Manager:  
Jae Lee  
Lee.Jae@epa.gov  
800-621-8431, Ext. 63781  
8:30 a.m. – 4:30 p.m., weekdays

For other inquiries about this public notice, please contact us.

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### Important Dates

- March 30 to May 1, 2018 – Public Comment Period

## Supporting Documents

- EPA 2018 Draft Approval to Commercially Store PCBs, 03/30/2018
- EEI Letter to EPA, Response to EPA Comments (Updated Application), 06/22/2017
- EPA Letter to EEI, Review of the draft Application for PCB Commercial Storage, 05/25/2017
- EEI's final Application for Commercial Storage of PCBs, 09/06/2013
- EPA's letter for Confirmation of Notice of Intent, 03/20/2012
- EEI's Letter to EPA, Notice of Intent to continue approval to store PCBs, 09/30/2005
- EPA 1995 Approval to Commercially Store PCBs, 09/21/1995

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## Comments

*Please use the form below to send us comments or questions. Be sure to include your e-mail address if you'd like a response.*

Name

Email Address

If you would like a response, please add your email address.

Comments (Required)

**Administrative Record Index *(FINAL TSCA APPROVAL)***

Environmental Enterprises Inc., Cincinnati, Ohio

OHD 083 377 010

<u>Title</u>	<u>Date</u>	<u>Prepared by</u>
1. TSCA PCB Approval	September 21, 1995	EPA
2. Notice of Intent for PCB Storage	September 30, 2005	EI
3. Confirmation of Notice of Intent	March 20, 2012	EPA
4. Final PCB Storage Application	September 6, 2013	EI
5. EJ Information	May 2017	EPA
6. NOD for the Application	May 25, 2017	EPA
7. Updated Application	June 22, 2017	EI
8. Public Notice	March 2018	EPA
9. Draft TSCA Approval	March 2018	EPA
10. Final TSCA Approval	June 2018	EPA

EJ: Environmental Justice

EI: Environmental Enterprises Inc.

EPA: United States Environmental Protection Agency

NOD: Notice of Deficiencies

PCB: Polychlorinated Biphenyls

TSCA: Toxic Substances Control Act



# Council OKs buyout; city manager says no

**Black says he intends to stay despite mayor's request for package**

**Dan Horn**  
Cincinnati Enquirer  
USA TODAY NETWORK

Cincinnati City Council approved a \$174,000 buyout Thursday for City Manager Harry Black, but he's not taking it.

Black said he stands by his previous statements this week about staying on the job.

For at least the near future, he should be able to do just that. A majority of City Council members, including many of those who voted for the buyout Thursday, said they would like Black to stick around.

Council voted 7-1 in a special meeting to approve the buyout package, which amounts to eight months' pay, after Mayor John Cranley proposed the idea. But Cranley still doesn't have the five votes he needs to force Black to leave and to end the stalemate that has paralyzed City Hall for several weeks.

"I don't think much has changed," Councilman P.G. Sittenfeld said after the vote.

Sittenfeld and four other council members still oppose Cranley's efforts to get rid of Black and have refused to accept a more generous buyout negotiated by the mayor and city manager that would pay Black more than \$400,000.

Several of those council members said Thursday they voted for the smaller buyout because that's what Black would receive under terms of his contract if he were fired. Anything more, they said, would be a waste of taxpayer dollars.

Cranley has said he wants Black out because some city employees have complained he behaves unprofessionally and has retaliated against those who disagree with him. Five employees have accused Black of retaliation in lawsuits.

The mayor has threatened to convene a public hearing to air employee grievances against Black if he doesn't voluntarily step down. He said he



Cincinnati City Manager Harry Black. UZ DUFOUR/THE ENQUIRER

hopes such a hearing, which could take place within a few weeks, would compel council to act.

Cranley's opponents on council, however, said there is no evidence to suggest Black should be dismissed. They said Cranley created the current crisis at City Hall because he no longer gets along with Black.

"We have a professional city manager who's willing to put aside his issues for the best interests of the city," Councilman Wendell Young said. "There is a major distraction, and that is the mayor. This is totally caused by Mayor Cranley."

Cranley declined comment after the vote Thursday. Black also did not comment, but his spokesman said he stands by a statement he made to City Council on Wednesday about his intention to stay on the job.

"Being city manager is an honor

**"I would very much like to continue in this capacity as long as my service is desired by this body."**

**Harry Black**  
Cincinnati city manager


Greg Landsman and Tamaya Denard.

Councilman Jeff Pastor, who had previously expressed support for the more generous buyout, voted against the smaller severance package Thursday.

Cranley asked Black to resign March 9 after the city manager ousted Assistant Police Chief Dave Bailey. Cranley, who previously had publicly praised the city manager, cited a pattern of unprofessional behavior, including a visit with subordinates to a strip club during a work trip in Denver two years ago.

Cranley offered Black two years' severance, but that fell apart without council support or Black's willingness to take it. Then came the \$423,000 deal, but it's been troubled from the start, too, without council support.

On Wednesday, in a 5-4 vote, council rejected the \$423,000 severance package.



**U.S. EPA Invites Your Comments on a Proposed Renewal of a PCB Permit for Environmental Enterprises Inc.**

**Cincinnati, Ohio**

Comment Period: March 30 – April 30, 2018

U.S. Environmental Protection Agency proposes to approve a request by Environmental Enterprises Inc. to renew its permit to operate as a commercial PCB storage facility under the federal Toxic Substances Control Act, or TSCA. The permit is for storage only of PCB waste received at the facility. The proposed permit renewal is for a period of 10 years. Environmental Enterprises, located at 4650 Spring Grove Road, Cincinnati, stores articles such as transformers, capacitors, ballasts, PCB oil, PCB-contaminated soil, and paint solvents in 55 gallon drums. The articles stored by EEI contain PCBs at regulated levels, which is greater than 50 parts per million. The material is stored until it can be shipped to an approved disposal facility.

U.S. EPA has determined the company has shown the operation does not present a risk to human health or the environment. The approval outlines specific conditions under which Environmental Enterprises Inc. must operate the facility. The public can comment on this draft approval from March 30 to April 1, 2018. Send your comments to U.S. EPA's Jae Lee at [lee.jae@epa.gov](mailto:lee.jae@epa.gov). Copies of the draft PCB commercial storage approval and supporting documents can be located at the Public Library of Cincinnati & Hamilton County, Northside Branch, or by sending comments to EPA's webpage at <https://www.epa.gov/pCBS/forms/public-notice-trans-cycle-industries-ohio-llc>.

U.S. EPA will review and respond to any comments from the public on the proposed approval for EEI. For questions, you may also contact TSCA Project Manager Jae Lee at 312-886-9317, 9 a.m. – 5:30 p.m., weekdays.



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Southwest District

501 East Fifth Street  
Canton, Ohio 45403-2911

TELE: 614/233-4027 FAX: 614/233-4241

WWW: OHIO.EPA.GOV

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Koresko, 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

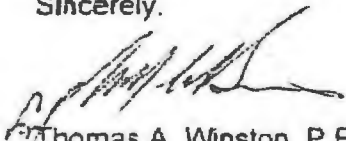
The following modification has been made to your Ohio Hazardous Waste Facility Installation and Operation Permit application:

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.

Mr. Daniel McCabe  
February 11, 2008  
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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/rll

<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):	
<b>Modification Classification (check one):</b>	<b>Classification Method (check one):</b>
<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 checked="" 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	
<b>For Class 2 Modifications</b>	
Notice of later construction date: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Applicable	
If Yes, date of notice to the facility:	
Date facility may begin construction:	
<b>For Class 3B Modification</b>	
<input checked="" 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Does the modification request meet the applicable rule requirements?*
	**See Administrative Checklists available on Haznet
<b>Proposed action on this modification:</b> <input type="checkbox"/> Approval <input type="checkbox"/> Denial (For signatory use the Directors Sign-off Sheet)	
Comments:	
2006-07-18 PA 112520_1 word	

DEA REGISTRATION NUMBER	THIS REGISTRATION EXPIRES	FEE PAID
RE0478746	08-31-2023	\$1850
SCHEDULES	BUSINESS ACTIVITY	ISSUE DATE
2,2N,3, 3N,4,5	REVERSE DISTRIB-COLLECTOR	08-04-2022
ENVIRONMENTAL ENTERPRISES INC 4650 SPRING GROVE AVE. CINCINNATI, OH 45232		

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.**

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

DEA REGISTRATION NUMBER	THIS REGISTRATION EXPIRES	FEE PAID
RE0478746	08-31-2023	\$1850
SCHEDULES	BUSINESS ACTIVITY	ISSUE DATE
2,2N,3, 3N,4,5	REVERSE DISTRIB-COLLECTOR	08-04-2022
ENVIRONMENTAL ENTERPRISES INC 4650 SPRING GROVE AVE. CINCINNATI, OH 45232		

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2,2N,3,3N,4,5	REVERSE DISTRIB-COLLECTOR	08-04-2022
ENVIRONMENTAL ENTERPRISES INC 4650 SPRING GROVE AVE. CINCINNATI, OH 45232		

CONTROLLED SUBSTANCE/REGULATED CHEMICAL  
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.

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Form DEA-223/511 (9/2016)



**REPORT  
CHANGES  
PROMPTLY**

REQUESTING MODIFICATIONS TO YOUR  
REGISTRATION CERTIFICATE

To request a change to your registered name, address, the drug schedule or the drug codes you handle, please

1. visit our web site at [deaddiversion.usdoj.gov](http://deaddiversion.usdoj.gov) - or
2. call our customer Service Center at 1-(800) 882-9539 - or
3. submit your change(s) in writing to:  
**Drug Enforcement Administration  
P.O. Box 2639  
Springfield, VA 22152-2639**

See Title 21 Code of Federal Regulations, Section 1301.51 for complete instructions.

----- You have been registered to handle the following chemical/drug codes: -----





**STATE OF OHIO**  
BOARD OF PHARMACY

**LICENSE TO DISTRIBUTE DANGEROUS DRUGS**

The entity named below is duly licensed, and is entitled to conduct business in the state of Ohio until June 30, 2023.

**ENVIRONMENTAL ENTERPRISES, INC.**

**4650 SPRING GROVE AVENUE**

**CINCINNATI, OH 45232**


**License Number: 010888700**

**Wholesaler - Category 3**

**Expiration Date: June 30, 2023**

CLASS: Wholesaler - Category 3  
BUSINESS TYPE: WD - Waste Disposal

**Responsible Person** – Print, sign and keep license in a readily retrievable location at the address listed on this license.

Responsible Person Name (Print)  Daniel S. McCabe	Signature of Responsible Person  
---	---

*Any change of responsible person must be reported within ten days of the effective date of the appointment of the new responsible person via Service Request on your Ohio eLicense Dashboard - [https://elicense.ohio.gov/oh\\_homepage](https://elicense.ohio.gov/oh_homepage).*

**State of Ohio Board of Pharmacy**  
77 South High Street, 17th Floor, Columbus, Ohio 43215  
T: 614/466-4143 | F: 614/752-4836 | [licensing@pharmacy.ohio.gov](mailto:licensing@pharmacy.ohio.gov)





GOVERNMENT  
OF THE  
DISTRICT OF COLUMBIA

License No: CF20000037  
Issue Date: 07/24/2020  
Expiration Date: 07/24/2022

DEPARTMENT OF HEALTH  
HEALTH REGULATION AND LICENSING ADMINISTRATION  
DEPARTMENT OF HEALTH  
DISTRICT OF COLUMBIA  
CERTIFICATE  
OF  
CONTROLLED SUBSTANCE REGISTRATION

REGISTRANT

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

CERTIFICATE NUMBER: CF20000037

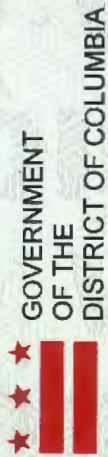
BUSINESS ACTIVITY  
NON-RESIDENT REVERSE DISTRIBUTOR

SCHEDULES  
II, IIN, III, IIIN, IV, V

*LaQuandra S. Nesbitt, MD, MPH*  
Director, Department of Health

This certificate applies only to the registrant listed herein and is not transferable on change of ownership, control, location, or business activity.





License No: DM2000118  
Issue Date: 07/24/2020  
Expiration Date: 07/31/2021

DEPARTMENT OF HEALTH  
HEALTH REGULATION AND LICENSING ADMINISTRATION  
PHARMACEUTICAL CONTROL DIVISION

899 NORTH CAPITOL STREET, NE, 2<sup>ND</sup> FLOOR  
WASHINGTON, DC 20002

*Be it known that*

**ENVIRONMENTAL ENTERPRISES, INC.**

4650 SPRING GROVE AVENUE  
CINCINNATI OH 45232

*has met all requirements prescribed by law and regulations and is hereby  
licensed as a(n)*

**Non-Resident Distributor**

*LaQuandra S. Schmitt MD*  
LaQuandra Nesbitt, MD, MPH  
Director, Department of Health

This certificate applies only to the registrant listed herein and is not transferable on change of ownership, control, location, or business activity.

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.

**Mike DeWine**  
Governor

**State of Ohio**  
Department of Commerce  
Division of State Fire Marshal

**Sheryl Maxfield**  
Director

**2022 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**

**Expiration Date: 07/01/2023**



**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**



In accordance with the provisions of Title XI, Organized Crime Control Act of 1970, and the regulations issued thereunder (27 CFR Part 555), you may engage in the activity specified in this license or permit within the limitations of Chapter 40, Title 18, United States Code and the regulations issued thereunder, until the expiration date shown. **THIS LICENSE IS NOT TRANSFERABLE UNDER 27 CFR 555.53.** See "WARNINGS" and "NOTICES" on reverse.

Direct ATF Correspondence To	ATF - Chief, FELC 244 Needy Road Martinsburg, WV 25405-9431	License/Permit Number	<b>4-OH-061-26-3K-01135</b>
Chief, Federal Explosives Licensing Center (FELC)	<i>Shawn Stevens</i>	Expiration Date	<b>October 1, 2023</b>

Name  
ENVIRONMENTAL ENTERPRISES INC

Premises Address (Changes? Notify the FELC at least 10 days before the move.)  
**4650 SPRING GROVE AVE  
CINCINNATI, OH 45232-**

Type of License or Permit  
26-DEALER OF EXPLOSIVES

**Purchasing Certification Statement**  
The licensee or permittee named above shall use a copy of this license or permit to assist a transferor of explosives to verify the identity and the licensed status of the licensee or permittee as provided by 27 CFR Part 555. The signature on each copy must be an original signature. A faxed, scanned or e-mailed copy of the license or permit with a signature intended to be an original signature is acceptable. The signature must be that of the Federal Explosives Licensee (FEL) or a responsible person of the FEL. I certify that this is a true copy of a license or permit issued to the licensee or permittee named above to engage in the business or operations specified above under "Type of License or Permit."

**Mailing Address (Changes? Notify the FELC of any changes.)**  
ENVIRONMENTAL ENTERPRISES INC  
4650 SPRING GROVE AVE  
CINCINNATI, OH 45232-

*Daniel J. McCabe*  
Licensee/Permittee Responsible Person Signature

*President*  
Position/Title

*10.16.20*  
Date

Printed Name  
Date

ATF Form 5400.14/5400.15 Part I  
Revised October 2011

Previous Edition is Obsolete ENVIRONMENTAL ENTERPRISES INC-4650 SPRING GROVE AVE-45232-4-OH-061-26-3K-01135-October 1, 2023-26-DEALER OF EXPLOSIVES

**Federal Explosives License (FEL) Customer Service Information**

Federal Explosives Licensing Center (FELC)  
244 Needy Road  
Martinsburg, WV 25405-9431

Toll-free Telephone Number: (877) 283-3352  
Fax Number: (304) 616-4401  
E-mail: FELC@atf.gov

ATF Homepage: www.atf.gov

**Change of Address (27 CFR 555.54(a)(1)).** Licensees or permittees may during the term of their current license or permit remove their business or operations to a new location at which they intend regularly to carry on such business or operations. The licensee or permittee is required to give notification of the new location of the business or operations not less than 10 days prior to such removal with the Chief, Federal Explosives Licensing Center. The license or permit will be valid for the remainder of the term of the original license or permit. **(The Chief, FELC, shall, if the licensee or permittee is not qualified, refer the request for amended license or permit to the Director of Industry Operations for denial in accordance with § 555.54.)**

**Right of Succession (27 CFR 555.59).** (a) Certain persons other than the licensee or permittee may secure the right to carry on the same explosive materials business or operations at the same address shown on, and for the remainder of the term of, a current license or permit. Such persons are: (1) The surviving spouse or child, or executor, administrator, or other legal representative of a deceased licensee or permittee; and (2) A receiver or trustee in bankruptcy, or an assignee for benefit of creditors. (b) In order to secure the right provided by this section, the person or persons continuing the business or operations shall furnish the license or permit for for that business or operations for endorsement of such succession to the Chief, FELC, within 30 days from the date on which the successor begins to carry on the business or operations.

(Continued on reverse side)

**Cut Here ✂**

**Federal Explosives License/Permit (FEL) Information Card**

License/Permit Name: ENVIRONMENTAL ENTERPRISES INC

Business Name:

License/Permit Number: 4-OH-061-26-3K-01135

License/Permit Type: 26-DEALER OF EXPLOSIVES

Expiration: October 1, 2023

Please Note: Not Valid for the Sale or Other Disposition of Explosives.



Mike DeWine, Governor  
 Jon Husted, Lt. Governor  
 Laurie A. Stevenson, Director

10/21/2019

Certified Mail

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

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

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1431072690  
 Permit Number: P0126514  
 Permit Type: Renewal  
 County: Hamilton

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) 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. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

**How to appeal this permit**

The issuance of this PTIO 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 Robert Sprague," 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  
 30 East Broad Street, 4th Floor  
 Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**


This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

## **What should you do if you notice a spill or environmental emergency?**

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.  
Assistant Chief, Permitting Section, DAPC

cc: SWOQA



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
ENVIRONMENTAL ENTERPRISES**

Facility ID: 1431072690  
Permit Number: P0126514  
Permit Type: Renewal  
Issued: 10/21/2019  
Effective: 10/21/2019  
Expiration: 10/21/2029



**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
ENVIRONMENTAL ENTERPRISES**

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## Authorization

Facility ID: 1431072690  
Application Number(s): A0063679  
Permit Number: P0126514  
Permit Description: PTIO renewal for P002-aerosol and non-aerosol shredder with carbon bed, P005-non-hazardous waste shredder, P006- hazardous waste tank#1 with scrubber and P007-hazardous waste tank#2 with scrubber. P013-Aerosol Can Crusher, P015-Aerosol Can Crusher and P901-Pugmill.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 10/21/2019  
Effective Date: 10/21/2019  
Expiration Date: 10/21/2029  
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

Laurie A. Stevenson  
Director





## Authorization (continued)

Permit Number: P0126514

Permit Description: PTIO renewal for P002-aerosol and non-aerosol shredder with carbon bed, P005- non-hazardous waste shredder, P006- hazardous waste tank#1 with scrubber and P007-hazardous waste tank#2 with scrubber. P013-Aerosol Can Crusher, P015-Aerosol Can Crusher and P901-Pugmill.

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

<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	Aerosol and Non-Aerosol Shredder with Carbon Bed
Superseded Permit Number:	P0108259
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P005</b>
Company Equipment ID:	Non-Hazardous Waste Shredder
Superseded Permit Number:	P0108128
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P006</b>
Company Equipment ID:	Hazardous Waste Tank # 1 with Scrubber
Superseded Permit Number:	P0107781
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P007</b>
Company Equipment ID:	Hazardous Waste Tank # 2 with Scrubber
Superseded Permit Number:	P0107792
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P013</b>
Company Equipment ID:	Can Crusher #1
Superseded Permit Number:	P0118559
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P015</b>
Company Equipment ID:	Can Crusher #2
Superseded Permit Number:	P0118621
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P901</b>
Company Equipment ID:	Pugmill #1
Superseded Permit Number:	P0108080
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
ENVIRONMENTAL ENTERPRISES  
**Permit Number:** P0126514  
**Facility ID:** 1431072690  
**Effective Date:** 10/21/2019

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the District Office or Local Air Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



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**Facility ID:** 1431072690  
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## **B. Facility-Wide Terms and Conditions**



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.





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## **C. Emissions Unit Terms and Conditions**



**1. P002, Non-Aerosol Shredder with Carbon Bed**

**Operations, Property and/or Equipment Description:**

Non-Aerosol Shredder

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the calculated annual emission rate is less than 10 tons/year taking into account the voluntary restriction from OAC rule 3745-31-05(E) in b)(1)b. below.
b.	OAC rule 3745-31-05(E)	Operate and maintain a carbon adsorption system with an overall control efficiency of at least 95%, by weight.

(2) Additional Terms and Conditions

a. None.

- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall monitor and record, at least once per week when the emission unit is in operation and processing VOC containing products, the following information for this emissions unit:
    - a. The inlet VOC emission concentrations flowing into the carbon adsorption system.
    - b. The outlet VOC emission concentrations from the carbon adsorption system.
    - c. The percent differential of the VOC emission concentrations between the inlet and outlet openings of the carbon adsorption system  $[(b)/(a) \times 100]$ .
    - d. If the emission unit did not operate in a week, a dated record that the emissions unit did not operate for the calendar week.
    - e. If the emission unit operated, but processed only non-VOC containing products, a dated record that the emissions unit processed only non-VOC containing products for the calendar week.
  - (2) If the outlet concentration of VOC emissions is greater than 5% of the inlet VOC emission concentration (as calculated in Section d)(1)), then breakthrough of VOC emissions has occurred. If such breakthrough has occurred, the permittee shall perform one of the following options:
    - a. Replace the carbon adsorption system (carbon) in order to maintain a control efficiency of at least 95%, by weight, for VOC emissions.
    - b. Confirm breakthrough of the VOC emissions by calculating the percent differential of the VOC emissions using the methodology as specified in Section d)(1), once per hour, for three consecutive hours.

If breakthrough of VOC emissions has been confirmed (i.e., each of the three calculations performed in Section b)(2)b. indicate a greater than 5% differential of VOC emissions through the outlet), then the permittee shall replace the carbon adsorption system (carbon) in order to maintain a control efficiency of at least 95% by weight, for VOC emissions.
  - (3) The permittee shall maintain monthly records that specify all times the carbon adsorption system (carbon) was replaced.
- e) Reporting Requirements
  - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section



of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

- (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Voluntary Restriction:

Operate and maintain a carbon adsorption system with an overall control efficiency of at least 95%, by weight.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- i. The emission testing shall be conducted within 6 months prior to the expiration of this permit.
- ii. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency of at least 95%, by weight for VOC's.
- iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):
- iv. Method 25A 40 CFR Part 60, Appendix A.
- v. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- vi. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)- if applicable
- vii. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local

air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

- viii. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- ix. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- x. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency

g) **Miscellaneous Requirements**

- (1) Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit-to-install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit-to-install.



**2. P005, Non-Hazardous Waste Shredder**

**Operations, Property and/or Equipment Description:**

Non-Hazardous Waste Shredder

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 2.5 pounds per hour and 3.0 tons per year.  See c)(1)

- (2) Additional Terms and Conditions
  - a. The hourly emission limitation outlined above is based upon the emissions unit's Potential to Emit (PTE). Therefore, no records or reports are required to demonstrate compliance with this limit.
  - b. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the allowable emission limitations and hours of operation limitation.



c) Operational Restrictions

- (1) The maximum annual operating rate for this emissions unit shall not exceed 2,400 hours.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following information each month:
  - a. The number of hours of operation of this emissions unit.
  - b. The company identification of each solvent employed.
  - c. The pounds of material processed in this emissions unit.

These monthly records shall be summed annually to demonstrate compliance with c)(1).

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic compound (OC) emissions shall not exceed 2.5 pounds per hour and 3.0 tons per year.

Applicable Compliance Method:

Compliance shall be determined by multiplying the pounds of material throughput by 50% (50% is product and 50% is packaging) then multiply by the worst case emission rate of 0.1%:

$$[\text{pounds processed per day} \times 0.50 \times 0.001 \text{ pound OC/pound processed}] / \text{hours/day} = \text{pounds OC/hr}$$

$$[\text{pounds processed per year} \times 0.50 \times 0.001 \text{ pound OC/pound processed}] / 2000 \text{ pound/ton} = \text{TPY of OC.}$$



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- g) Miscellaneous Requirements
  - (1) None.





**3. P006, Hazardous Waste Tank # 1 with Scrubber**

**Operations, Property and/or Equipment Description:**

Hazardous Waste Tank #1 with Scrubber

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) and particulate emissions 10 microns or less in diameter (PM10) shall not exceed 0.32 pound per hour and 1.05 tons per year (TPY).  Visible particulate emissions from any stack shall not exceed 0 percent opacity as a six-minute average.
b.	OAC rule 3745-17-11(B)(1)	The emission limitation established in accordance with this rule is less stringent than the limitation established in accordance with OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(A)	The emission limitation established in accordance with this rule is less stringent than the limitation established in accordance with OAC rule 3745-31-05(A)(3).



- (2) Additional Terms and Conditions
  - a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a scrubber with a minimum control efficiency of 95%, PM/PM10 emission limitations and visible emissions limitation.
  - b. The emissions from this emissions unit shall be vented to the wet scrubber at all times the emissions unit is in operation.
- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable scrubber liquid flow rate, that shall be maintained in order to demonstrate compliance, shall not be less than 10 gallons per minute.
  - (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the scrubber liquid flow rate (in gallons per minute) during operation of this emissions unit(s), including periods of startup and shutdown. The permittee shall record the scrubber liquid's flow rate on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date the corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the flow rate readings immediately after the corrective action was implemented;  
and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (3) These range(s) and/or limit(s) for the liquid flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the liquid flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable particulate emission rate for this/these emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.
- (4) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the wet scrubber during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the liquid flow rate was outside of the appropriate range or exceeded the applicable limit contained in this permit;



- b. any period of time (start time and date, and end time and date) when the emissions unit(s) was in operation and the process emissions were not vented to the scrubber;
  - c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the liquid flow rate into compliance with the appropriate range or limit contained in this permit, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (3) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Particulate emissions (PE) and particulate emissions 10 microns or less in diameter (PM10) shall not exceed 0.32 pound per hour and 1.05 tons per year (TPY).

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined using the following equation:

$$A \times B \times (1-C)$$

Where:

A = pounds of material charged per hour = 3200 pounds

B = percent of material charged that is vented to the scrubber = .2%

C = control efficiency of scrubber = 95%

Compliance with the annual emission limitation shall be determined using the following equation:

$$A \times B \times (1-C)/2000 \text{ pounds}$$



Where:

A = hourly emission rate = 0.32 pound per hour

B = 8760 hours per year

C = downtime between batches = 0.25

b. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 0 percent opacity as a six-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

(1) None.



**4. P007, Hazardous Waste Tank # 2 with Scrubber**

**Operations, Property and/or Equipment Description:**

Treatment Tank # 2 with Scrubber

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) and particulate emissions 10 microns or less in diameter (PM10) shall not exceed 0.10 pound per hour and 0.33 ton per year (TPY).  Visible particulate emissions from any stack shall not exceed 0 percent opacity as a six-minute average.
b.	OAC rule 3745-17-11(B)(1)	The emission limitation established in accordance with this rule is less stringent than the limitation established in accordance with OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(A)	The emission limitation established in accordance with this rule is less stringent than the limitation established in accordance with OAC rule 3745-31-05(A)(3).



- (2) Additional Terms and Conditions
  - a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a scrubber with a minimum control efficiency of 95%, PM/PM10 emission limitations and visible emissions limitation.
  - b. The emissions from this emissions unit shall be vented to the wet scrubber at all times the emissions unit is in operation.
- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable scrubber liquid flow rate, that shall be maintained in order to demonstrate compliance, shall not be less than 10 gallons per minute.
  - (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the scrubber liquid flow rate (in gallons per minute) during operation of this emissions unit(s), including periods of startup and shutdown. The permittee shall record the scrubber liquid's flow rate on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;



- g. the date the corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the flow rate readings immediately after the corrective action was implemented;  
and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (3) These range(s) and/or limit(s) for the liquid flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the liquid flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable particulate emission rate for this/these emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.
- (4) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the wet scrubber during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the liquid flow rate was outside of the appropriate range or exceeded the applicable limit contained in this permit;





- b. any period of time (start time and date, and end time and date) when the emissions unit(s) was in operation and the process emissions were not vented to the scrubber;
  - c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the liquid flow rate into compliance with the appropriate range or limit contained in this permit, was determined to be necessary and was not taken; and each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (3) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Particulate emissions (PE) and particulate emissions 10 microns or less in diameter (PM10) shall not exceed 0.10 pound per hour and 0.33 ton per year (TPY).

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined using the following equation:

$$A \times B \times (1-C)$$

Where:

A = pounds of material charged per hour = 1000 pounds

B = percent of material charged that is vented to the scrubber = .2%

C = control efficiency of scrubber = 95%

Compliance with the annual emission limitation shall be determined using the following equation:

$$A \times B \times (1-C)/2000 \text{ pounds}$$

Where:



A = hourly emission rate = 0.10 pound per hour

B = 8760 hours per year

C = downtime between batches = 0.25

b. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 0 percent opacity as a six-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

(1) None.



**5. P013, Can Crusher #1**

**Operations, Property and/or Equipment Description:**

Aerosol Can Crusher

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the calculated potential to emit is less than 10 tons/year.
b.	OAC rule 3745-31-05(F)	See b)(2)a.

(2) Additional Terms and Conditions

a. The emissions unit shall be operated under negative pressure at all times while the unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the less than 10 tons per year emission limitation(s) contained in this permit, the emissions unit shall be operated under negative pressure at all times while the unit is in operation. The negative pressure shall be maintained within the range of 0.5 and 10 inches of water.

The permittee shall properly install, operate, and maintain a continuous pressure monitor that measures the amount of negative pressure when the emissions unit(s) is in operation, including periods of startup and shutdown. Units shall be in inches of water. Whenever the monitored amount of negative pressure deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the emissions unit within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the negative pressure readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

The negative pressure range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted negative pressure range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the pollutant(s). In addition, approved revisions to the negative pressure range/limit will



not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (2) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The reports required by this permit may be submitted through the Ohio EPA’s eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

VOC emissions shall be less than 10 tons per year to avoid the Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

Applicable Compliance Method:

The hourly VOC emission rate was determined as follows:

VOC emissions from equipment leaks were determined utilizing VOC emission factors found in *US EPA Protocol for Equipment Leak Emission Estimates EPA-453/R-95-017, 11/1995, Table 2-1* as follows:

Pumps(heavy liquid): 2 components x 0.019 lb/hr = 0.038 lb/hr

Valves (gas): 9 components x 0.0132 lb/hr = 0.1188 lb/hr

Valves (heavy liquid) 4 components x 0.0005 lb/hr = 0.002 lb/hr

Open End 1 component x 0.0038 lb/hr = 0.0038 lb/hr



Flanges/Connections(gas) 12 components x 0.0039 lb/hr = 0.0468 lb/hr

Sampling ports 3 components x 0.033 lb/hr = 0.099 lb/hr

Compressor 1 component x 0.5027 lb/hr = 0.5027 lb/hr

Total hourly equipment leak VOC emissions = 0.812 lb/hr

An additional emissions factor taken from a similar emissions unit was applied to each can processed as follows:

$0.00064 \text{ lb VOC/can} \times 2100 \text{ cans/hr} = 1.34 \text{ lbs VOC/hr}$

Add the equipment leak emissions to the hourly emissions from each can:

$1.34 \text{ lb/hr} + 0.812 \text{ lb/hr} = 2.15 \text{ lbs/hr VOC}$

The annual emissions are determined by multiplying the hourly emission rate by the total number of hours the emissions unit ran during the year then divide by 2000 lbs/ton.

g) Miscellaneous Requirements

(1) None.



**6. P015, Can Crusher #2**

**Operations, Property and/or Equipment Description:**

Aerosol Can Crusher #2

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC emissions is less than 10 tons per year.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.



d) Monitoring and/or Recordkeeping Requirements

- (1) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit
- (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

VOC emissions shall be less than 10 tons per year to avoid the Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

Applicable Compliance Method:

First determine the hourly VOC emission rate as follows:

VOC emissions from equipment leaks were determined utilizing VOC emission factors found in *US EPA Protocol for Equipment Leak Emission Estimates EPA-453/R-95-017, 11/1995, Table 2-1* as follows:

Pumps(heavy liquid): 2 components x 0.019 lb/hr = 0.038 lb/hr

Valves (gas): 9 components x 0.0132 lb/hr = 0.1188 lb/hr

Valves (heavy liquid) 4 components x 0.0005 lb/hr = 0.002 lb/hr

Open End 1 component x 0.0038 lb/hr = 0.0038 lb/hr

Flanges/Connections(gas) 12 components x 0.0039 lb/hr = 0.0468 lb/hr





Sampling ports            3 components x 0.033 lb/hr    = 0.099 lb/hr

Compressor              1 component x 0.5027 lb/hr    = 0.5027 lb/hr

Total hourly equipment leak VOC emissions            = 0.812 lb/hr

An additional emissions factor taken from a similar emissions unit was applied to each can processed as follows:

$0.00064 \text{ lb VOC/can} \times 1680 \text{ cans/hr} = 1.07 \text{ lbs VOC/hr}$

Add the equipment leak emissions to the hourly emissions from each can:

$1.07 \text{ lb/hr} + 0.812 \text{ lb/hr} = 1.88 \text{ lbs/hr VOC}$

Calculate the annual emissions by multiplying the hourly emission rate of 1.88 lbs VOC/hr by 8760 hour/year then divide by 2000 lbs/ton to get 8.23 TPY VOC.

Divide 8.23 TPY by 12 months/yr to get the monthly emission limit of 0.685 lbs VOC per month.

g) Miscellaneous Requirements

- (1) None.



**7. P901, Pugmill #1**

**Operations, Property and/or Equipment Description:**

Waste stabilization process

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the Particulate Emissions (PE) and Particulate Matter 10 Microns and less in diameter (PM10) emissions from this air contaminant source since the calculated annual emission rate is less than 10 tons/year taking into account the voluntary restriction from OAC rule 3745-31-05(E) in b)(1)b. below.
b.	OAC rule 3745-31-05(E)	Operate and maintain an enclosure, rotoclone, and a fabric filter with an overall control efficiency of at least 95%, by weight.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.
e.	OAC rule 3745-17-08(B)(3)	See b)(2)(a).
f.	OAC rule 3745-17-11(B)	Particulate emissions (PE) from the stack shall not exceed 2.22 pounds per hour.  Table I of OAC rule 3745-17-11

(2) Additional Terms and Conditions

- a. The installation and use of hoods, fans, and/or other equipment to adequately enclose, contain, capture, vent, and control fugitive dust from this emissions unit shall meet the following requirements:
  - i. the collection efficiency shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design; and
  - ii. the control equipment for this emissions unit shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions (whichever is less stringent) from the exhaust stack of this emissions unit.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across each baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across each baghouse on daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.



In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across each baghouse is 1 to 5 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

- (2) The permittee shall perform daily checks, when the emissions unit is in operation and, when the weather conditions allow, for any visible particulate emissions from the exhaust stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed from any points of capture and/or the stack, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. the total duration of any visible emissions incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
- (3) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section



of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

- (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Particulate Emissions (PE) and PM10 emissions shall be less than 10 tons per year to avoid the Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

Applicable Compliance Method:

Particulate Emissions (PE)

Emissions are determined using emission factors from AP-42 Chapter 11.12-2 as follows:

Multiply the maximum process rate of 0.40 ton/hr x 0.73 lb/ton x (1 - 0.95) = 0.015 lb/hr PE.

Multiply the hourly emissions by the maximum number of hours operated then divide by 2000 pounds to get the annual emissions.

Emissions are determined using emission factors from AP-42 Chapter 11.12-2 as follows:

Multiply the maximum process rate of 0.40 ton/hr x 0.47 lb/ton x (1 - 0.95) = 0.0095 lbs/hr PE.

Multiply the hourly emissions by the maximum annual number of hours operated then divide by 2000 pounds to get the annual emissions.

Fugitive PE/PM10

Emissions are determined using emission factors from AP-42 Chapter 11.17-4 as follows:

Multiply the maximum process rate of 0.40 ton/hr x 0.61 lb/ton = 0.24 lb/hr PE/PM10.

Multiply the hourly emissions by the maximum annual number of hours operated then divide by 2000 pounds to get the annual emissions.



b. Emission Limitation:

Visible particulate emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

c. Emission Limitation:

Visible particulate emissions from the baghouse stack shall not exceed 20% opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

d. Emission Limitation:

The controlled emissions from the stack shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible emissions from the exhaust stack.

Applicable Compliance Method:

Compliance with the requirement for no visible particulate emissions from the exhaust stack, identified in this permit, shall be determined in accordance with U.S. EPA Method 22. If opting to comply with the outlet particulate emissions rate, compliance with the 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from the stack shall be determined in accordance with U.S. EPA Methods 1 through 5, as appropriate.

e. Emission Limitation:

PE from the stack shall not exceed 2.22 pound per hour which is applicable once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Applicable Compliance Method:

The hourly emission limitation was determined using Table I of OAC rule 3745-17-11. The maximum hourly process rate is 800 pounds per hour and Table I gives a corresponding allowable PE rate of 2.22 pounds per hour.

If required, compliance shall be demonstrated through emissions testing using US EPA Methods 1 through 5.



**Final Permit-to-Install and Operate**  
ENVIRONMENTAL ENTERPRISES  
**Permit Number:** P0126514  
**Facility ID:** 1431072690  
**Effective Date:** 10/21/2019

- g) Miscellaneous Requirements
  - (1) None.

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

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(SEE ENCLOSED LETTER FOR EXPLANATION)

*Donald R. Schryer*

DIRECTOR



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 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. Schryver*

DIRECTOR

NOTICE OF REGISTRATION

40

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 43 - CYANIDE ANALYSIS  
COMPANY ID LAB HOOD 43  
ISSUE DATE 06/11/93  
EFFECTIVE DATE 06/11/93

---

(SEE ENCLOSED LETTER FOR EXPLANATION)

*Donald R. Schuyler*

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. Schlegel*

DIRECTOR

NOTICE OF REGISTRATION

40

TO:

ENVIRONMENTAL ENTERPRISES, INC.  
4650 SPRING GROVE AVENUE  
CINCINNATI

OHIO 45232

RECEIVED - SWD AIR  
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

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(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 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



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

6/15/2017

Environmental Enterprises Inc  
Daniel McCabe  
4650 Spring Grove Ave  
Cincinnati OH 45232

Re: Approval Under Ohio EPA National Pollutant Discharge Elimination System (NPDES)  
Industrial Storm Water - OHR000006 General Permit (the permit)

Dear NOI Applicant

Your NPDES Notice of Intent application is approved for the following facility. Please use your Ohio EPA Facility Permit Number in all future correspondence.

**Facility Name:** Environmental Enterprises Inc

**Facility Location:** 4650 Spring Grove Ave

**City/Twp:** Cincinnati

**County:** Hamilton

**Ohio EPA Facility Permit Number:** 1GR01518\*AG

**U.S. EPA #:** OHGR01482

**Effective Date:** 7/1/2017

**A copy of the permit may be viewed or downloaded from the following web address:**

<http://www.epa.ohio.gov/dsw/permits/gpfact.aspx>

If you cannot access the permit online, contact Ohio EPA at 614-644-2001, and a copy will be mailed to the address you provide.

Please read and review the permit carefully. The permit contains requirements and prohibitions with which you must comply, including the submission of Discharge Monitoring Reports (DMRs). DMRs should be submitted online using the Ohio EPA eBusiness Center eDMR internet service. See <http://epa.ohio.gov/dsw/edmr/eDMR.aspx> for instructions. If you are unable to use this service due to a demonstrable hardship call 614-644-2001 to request paper DMR forms. Coverage under this permit will remain in effect until a renewal of the permit is issued by the Ohio EPA. If you have questions call 614-644-2001.

Sincerely,  
A handwritten signature in black ink that reads "Craig W. Butler". The signature is written in a cursive, flowing style.

Craig W. Butler  
Director

cc: Osika, Mary  
File

## WASTEWATER DISCHARGE PERMIT

**Permittee:** Environmental Enterprises, Inc.

**Address:** 4650 Spring Grove Avenue  
Cincinnati OH 45232

**MSD Permit Number:** SIU-42  
**Effective Date:** 01/01/2021  
**Expiration Date:** 12/31/2025

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.

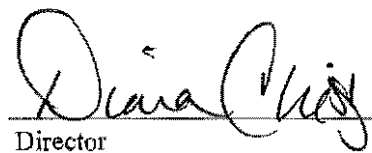
This permit may be modified by MSD, as required or authorized by MSD Rules and Regulations, or as required by the Federal Government or agencies thereof.

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.

  
\_\_\_\_\_  
Superintendent  
Compliance Services 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. Any special facility requirements imposed on MSD and any accompanying EPA personnel by the Permittee, including but not limited to security or safety, shall be incurred at the Permittee's expense. (Sections 2101 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, Commercial Waste Group, 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 Commercial Waste Group 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:** 01/01/2021  
**Expiration Date:** 12/31/2025

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, private manhole, public manhole or pump station servicing the facility, or cause a dry-weather overflow from the public sewer.
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	NA	Batch	Every Batch	Semi-Annually
42-02	pH	5.0-12.5 S.U.	NA	Batch	Every Batch	Violations Only
42-02	Oil & Grease (NonBio)	50.0 mg/L	NA	Batch	4 Days Semi-Annually	Semi-Annually
42-02	Antimony	0.249 mg/L	0.206 mg/L	Batch	4 Days Semi-Annually	Semi-Annually
42-02	Arsenic	0.162 mg/L	0.104 mg/L	Batch	4 Days Semi-Annually	Semi-Annually
42-02	Cadmium	0.474 mg/L	0.0962 mg/L	Batch	4 Days Semi-Annually	Semi-Annually
42-02	Chromium	0.947 mg/L	0.487 mg/L	Batch	4 Days Semi-Annually	Semi-Annually
42-02	Cobalt	0.192 mg/L	0.124 mg/L	Batch	4 Days Semi-Annually	Semi-Annually

Sample Location	Pollutant	Daily Limit	Monthly Average	Required Sample Type	Sample Frequency	Report Frequency
42-02	Copper	0.405 mg/L	0.301 mg/L	Batch	4 Days Semi-Annually	Semi-Annually
42-02	Lead	0.222 mg/L	0.172 mg/L	Batch	4 Days Semi-Annually	Semi-Annually
42-02	Mercury	0.00234 mg/L	0.000739 mg/L	Batch	4 Days Semi-Annually	Semi-Annually
42-02	Nickel	3.95 mg/L	1.45 mg/L	Batch	4 Days Semi-Annually	Semi-Annually
42-02	Silver	0.12 mg/L	0.0351 mg/L	Batch	4 Days Semi-Annually	Semi-Annually
42-02	Tin	0.409 mg/L	0.12 mg/L	Batch	4 Days Semi-Annually	Semi-Annually
42-02	Titanium	0.0947 mg/L	0.0618 mg/L	Batch	4 Days Semi-Annually	Semi-Annually
42-02	Vanadium	0.218 mg/L	0.0662 mg/L	Batch	4 Days Semi-Annually	Semi-Annually
42-02	Zinc	2.87 mg/L	0.641 mg/L	Batch	4 Days Semi-Annually	Semi-Annually
42-02	Cyanide (Total)	15.0 mg/L	NA	Batch	4 Days Semi-Annually	Semi-Annually
42-02	Cyanide (Free)	3.0 mg/L	NA	Batch	4 Days Semi-Annually	Semi-Annually
42-02	Carbazole	0.392 mg/L	0.233 mg/L	Batch	4 Days Semi-Annually	Semi-Annually
42-02	n-Decane	5.79 mg/L	3.31 mg/L	Batch	4 Days Semi-Annually	Semi-Annually
42-02	2,4,6-Trichlorophenol	0.155 mg/L	0.106 mg/L	Batch	4 Days Semi-Annually	Semi-Annually
42-02	Bis(2-ethylhexyl)phthalate	0.267 mg/L	0.158 mg/L	Batch	4 Days Semi-Annually	Semi-Annually
42-02	Fluoranthene	0.787 mg/L	0.393 mg/L	Batch	4 Days Semi-Annually	Semi-Annually
42-02	n-Octadecane	1.22 mg/L	0.925 mg/L	Batch	4 Days Semi-Annually	Semi-Annually
42-02	o-Cresol	1.92 mg/L	0.581 mg/L	Batch	4 Days Semi-Annually	Semi-Annually
42-02	p-Cresol	0.898 mg/L	0.205 mg/L	Batch	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:** 01/01/2021  
**Expiration Date:** 12/31/2025

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 Commercial Waste Group 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 Commercial Waste Group 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, is 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 Commercial Waste Group. In the case of an unanticipated bypass the Permittee shall notify the Commercial Waste Group 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 Commercial Waste Group 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 5 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: Brahima Camara  
Or by email to: Brahima.Camara@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.

Auxiliary meters shall be installed in accordance with the standards, rules and regulations of the applicable public water works. Auxiliary meters shall not be relocated, taken out of service, or put into a different service. Auxiliary meters shall be maintained at the owner's expense.

9. The Permittee must notify MSD 48 hours prior to each and every batch discharge of process wastewater. Notification may be made to the MSD Commercial Waste Group by email to [MSDBatchDischarge@cincinnati-oh.gov](mailto:MSDBatchDischarge@cincinnati-oh.gov), telephone to 513-557-7000 or by facsimile transmittal to 513-557-7050.
10. The Permittee shall completely mix and discharge the entire contents of the batch tank. Discharge shall be released at a reasonable rate over a period of time. 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.
11. 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).
12. 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.
13. 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.
14. 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.
15. The Permittee shall document each waste stream accepted for discharge to MSD in the Wastewater Discharge Permit Application on file with the Compliance Services 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 Compliance Services Division. The notice, laboratory characterization and treatment plan shall be submitted prior to the date of discharge of the wastestream.

LAB REPORT	SIGNATURE	<b>MSD SIU PERIODIC COMPLIANCE REPORT</b> Report due 45 days after the month of sampling.	PAGE 1 OF 2
DATE RECEIVED	INITIALS		PERMIT NO. <b>SIU-42</b>  Permit Expiration Date 12/31/2025

<b>1. Name of Company Having Wastewater Discharge</b> Environmental Enterprises, Inc.	<b>2. Has the Ownership or Occupancy Changed Since the Last Report?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No	
<b>3. Address of Wastewater Discharge</b> 4650 SPRING GROVE AV Cincinnati, OH 45232	<b>4. Name of Industrial Wastewater Contact</b> Warren G. Taylor	<b>5. Phone Number</b> 513-541-1823
<b>6. Mailing Address</b> 4650 Spring Grove Avenue Cincinnati, OH 45232	<b>7. SIC Number</b> 9511	<b>8. Reporting Period</b>
<b>9. Name of Lab Performing Analysis</b>	<b>10. Sample Location</b> 42-02 - PROCESS FLOW: Northeast flume in pit within cage along front of building on Spring Grove Avenue.	

Date of Collection	UNITS	RESULT	RESULT	RESULT	RESULT	RESULT
Flow, Total	Gallon					
Oil & Grease (NonBio)	mg/L					
Antimony	mg/L					
Arsenic	mg/L					
Cadmium	mg/L					
Chromium	mg/L					
Cobalt	mg/L					
Copper	mg/L					
Lead	mg/L					
Mercury	mg/L					
Nickel	mg/L					
Silver	mg/L					
Tin	mg/L					
Titanium	mg/L					
Vanadium	mg/L					
Zinc	mg/L					
Cyanide (Total)	mg/L					
Cyanide (Free)	mg/L					
Carbazole	mg/L					
n-Decane	mg/L					
2,4,6-Trichlorophenol	mg/L					
Bis(2-ethylhexyl)phthalate	mg/L					
Fluoranthene	mg/L					
n-Octadecane	mg/L					
o-Cresol	mg/L					

**CERTIFICATION BY PERMITTEE**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of responsible company official:	Date:
Print name of official:	Title:

LAB REPORT	SIGNATURE	<b>MSD SIU PERIODIC COMPLIANCE REPORT</b> Report due 45 days after the month of sampling.	PAGE 2 OF 2
DATE RECEIVED	INITIALS		PERMIT NO. <b>SIU-42</b>  Permit Expiration Date 12/31/2025

<b>1. Name of Company Having Wastewater Discharge</b> Environmental Enterprises, Inc.	<b>2. Has the Ownership or Occupancy Changed Since the Last Report?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No
<b>3. Address of Wastewater Discharge</b> 4650 SPRING GROVE AV Cincinnati, OH 45232	<b>4. Name of Industrial Wastewater Contact</b> Warren G. Taylor
<b>6. Mailing Address</b> 4650 Spring Grove Avenue Cincinnati, OH 45232	<b>7. SIC Number</b> 9511
<b>9. Name of Lab Performing Analysis</b>	<b>8. Reporting Period</b>  <b>10. Sample Location</b> 42-02 - PROCESS FLOW; Northeast flume in pit within cage along front of building on Spring Grove Avenue.

Date of Collection	UNITS	RESULT	RESULT	RESULT	RESULT	RESULT
p-Cresol	mg/L					

AA = less than Method Detection Limit  
 AH = Certification in lieu of monitoring

**CERTIFICATION BY PERMITTEE**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

<b>Signature of responsible company official:</b>	<b>Date:</b>
<b>Print name of official:</b>	<b>Title:</b>

## Permit Fact Sheet

### FACILITY INFORMATION:

Facility Name: Environmental Enterprises, Inc.

Facility ID: 42

Physical Location: 4650 Spring Grove Avenue  
Cincinnati, OH 45232

Municipal Sewer: 450 GPD

Facility Type: Significant Industrial User

Regulation Standard: Local Limits: MIL, Federal: 437 D

### CONTROL PLANS:

#### Certification - Equivalent Trt

Received: 1/21/2020

Status: Approved

Approval Date: 1/24/2020

Last Review Date: 10/21/20

Comments:

Last Review By: Luecke

#### Certification - PCBs and Past.

Received: 1/21/2020

Status: Approved

Approval Date: 1/24/2020

Last Review Date: 10/21/20

Comments:

Last Review By: Luecke

#### Certification - Radiation

Received: 1/21/2020

Status: Approved

Approval Date: 1/24/2020

Last Review Date: 10/21/20

Comments:

Last Review By: Luecke

#### Certification - Zero Discharge

Received:

Status: Approved

Approval Date: 10/23/2020

Last Review Date: 10/21/20

Comments: Certification on PCR that no process waste water discharged in previous semi-annual period

Last Review By: Luecke

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### SITE OPERATION INFORMATION:

Start of Operation at current address:

1979

Years at current address:

42

Operation Description:

This facility is permitted as a Significant Industrial User since they are categorical under 40 CFR 437D as a central waste treatment facility for hazardous, non hazardous, liquid and solid wastes.

Wastes are received, logged in, and sorted to specific storage areas. There are thirteen different storage areas to segregate wastes by type. Drums are loaded onto skids and stacked two high. Each drum is given an ID number for tracking. Roll-off boxes and empty drums are stored outside on the pavement. The facility's processes include waste treatment and the by-products are hauled off-site for use/reuse/disposal. Treatment processes include pH neutralization, metals/solids precipitation, solidifying and filtering. Gold, silver and copper recovery electroplating is also done at the facility. The facility also collects oil, antifreeze, paper, ferrous and other metals to be sent off-site for recycling. Support activities include air compressors, boiler, nitrogen compressors, process lab, rotocloner, lab water system, and offices are also operated at this site. The facility has an annex for paint disposal, and PCB transfer/shipment point.

Storm water is collected from all paved areas and trickled through a shaft where a furnace/blower evaporates the water. Storm water concentrate that is not evaporated is treated along with other wastewaters. The facility can store 20,000 gals of storm water and evaporates up to 1,000 gpd.

The facility does not discharge process wastewater and discharges sanitary wastewater only. A pH monitor is in place, but has not run since May 5, 2001.





**Permit Fact Sheet**

		<b>FED</b>	<b>LOCAL</b>	<b>Most Stringent</b>
<b>Mercury</b>	Daily Maximum	0.002	0.020	0.002
	Monthly Average	0.001	-	0.001
<b>Nickel</b>	Daily Maximum	3.950	10.000	3.950
	Monthly Average	1.450	-	1.450
<b>Silver</b>	Daily Maximum	0.120	-	0.120
	Monthly Average	0.035	-	0.035
<b>Tin</b>	Daily Maximum	0.409	-	0.409
	Monthly Average	0.120	-	0.120
<b>Titanium</b>	Daily Maximum	0.095	-	0.095
	Monthly Average	0.062	-	0.062
<b>Vanadium</b>	Daily Maximum	0.218	-	0.218
	Monthly Average	0.066	-	0.066
<b>Zinc</b>	Daily Maximum	2.870	10.000	2.870
	Monthly Average	0.641	-	0.641
<b>Cyanide (Total)</b>	Daily Maximum	-	15.000	15.000
<b>Cyanide (Free)</b>	Daily Maximum	-	3.000	3.000
<b>Carbazole</b>	Daily Maximum	0.392	-	0.392
	Monthly Average	0.233	-	0.233
<b>n-Decane</b>	Daily Maximum	5.790	-	5.790
	Monthly Average	3.310	-	3.310
<b>2,4,6-Trichlorophenol</b>	Daily Maximum	0.155	-	0.155
	Monthly Average	0.106	-	0.106
<b>Bis(2-ethylhexyl)phthalate</b>	Daily Maximum	0.267	-	0.267
	Monthly Average	0.158	-	0.158
<b>Fluoranthene</b>	Daily Maximum	0.787	-	0.787
	Monthly Average	0.393	-	0.393
<b>n-Octadecane</b>	Daily Maximum	1.220	-	1.220
	Monthly Average	0.925	-	0.925
<b>o-Cresol</b>	Daily Maximum	1.920	-	1.920
	Monthly Average	0.561	-	0.561
<b>p-Cresol</b>	Daily Maximum	0.698	-	0.698

### Permit Fact Sheet

		FED	LOCAL	Most Stringent
p-Cresol	Monthly Average	0.205	-	0.205

All limits are in mg/L.

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

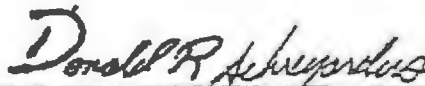
Description of Proposed Source: Modification to Install Additional Pretreatment Equipment, Cincinnati, Metropolitan Sewer District, Hamilton County

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 3745-31 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



Donald R. Schregardus

Director

P. O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149

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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

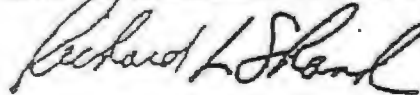
Description of Proposed Source: Pretreatment - Sludge Filter Press

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

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**City of**  
**Department of Safety**

**Cincinnati**

**Division of Fire**

**Permit**

**Permit Number: FC20181302**  
**Fire Company: E38**  
**Fire District: D-3**

**Premise Address:**  
**ENVIRONMENTAL ENTERPRISES INC.**  
**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/  
LPG 200 CU FT CYLINDERS-NITROGEN**

**THIS PERMIT EXPIRES: 09/30/2019**

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.

*R. E. White*  
**FIRE CHIEF**

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



**City of**

**Department of Safety**

**Cincinnati**

**Division of Fire**

**Permit**

**Permit Number: FC20181303**

**Fire Company: E38**

**Fire District: D-3**

**Premise Address:**

**ENVIRONMENTAL ENTERPRISES INC.  
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 FLAMMABLE AND/OR COMBUSTIBLE LIQUIDS**

**THIS PERMIT EXPIRES: 09/30/2019**

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.

*R. E. White*  
**FIRE CHIEF**

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

City of  
Department of Safety



Cincinnati  
Division of Fire

Permit

Permit Number: **FC20181304**  
Fire Company: E38  
Fire District: D-3

Premise Address:  
ENVIRONMENTAL ENTERPRISES INC.  
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

**WELDING AND/OR CUTTING OPERATION**

**THIS PERMIT EXPIRES: 09/30/2019**

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.

  
FIRE CHIEF

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





**City of**  
**Department of Safety**

**Cincinnati**  
**Division of Fire**

**Permit**

**Permit Number: FC20181305**  
**Fire Company: E38**  
**Fire District: D-3**

**Premise Address:**  
**ENVIRONMENTAL ENTERPRISES INC.**  
**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: 09/30/2019**

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.

*Ray E. White*  
**FIRE CHIEF**

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

# 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 Pan

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.



KENTUCKY DEPARTMENT FOR ENVIRONMENTAL PROTECTION  
DIVISION OF WASTE MANAGEMENT  
CERTIFICATE OF REGISTRATION  
FOR HAZARDOUS WASTE MANAGEMENT ACTIVITY

**ISSUED TO:**

MIDWEST ENVIRONMENTAL TRANSPORT, INC.  
ATTN: DALE BOST  
10163 CINCINNATI-DAYTON ROAD  
CINCINNATI, OHIO 45241

**LOCATED AT:**

10163 CINCINNATI-DAYTON RD  
CINCINNATI, OH 45241

**TYPE OF CERTIFICATE:** MODIFICATION CHANGE

The Division of Waste Management hereby issues the above-named installation a Certificate of Registration for the hazardous waste activity specified below. This Certificate is issued under the provisions of KRS Chapter 224 and regulations promulgated pursuant thereto. Conformance with all applicable laws and regulations is the responsibility of the registrant. All rights of inspection by representatives of the Division of Waste Management are reserved.

This Certificate supersedes all previous Certificates of Registration.

**EPA ID NUMBER:** OH0-000-000-539  
**AI NUMBER:** 131614  
**STATE:** OHIO  
**ISSUED:** 08/26/16  
**EFFECTIVE:** 08/22/16  
**EXPIRATION:** NONE  
**ACTIVITY:** HAZARDOUS, PCB, NON-HAZARDOUS WASTE

April J. Webb, P.E.  
Branch Manager  
Hazardous Waste Branch

Carla Cornett/Edith Greer/Maria Wood  
Environmental Technologists

Questions concerning this Certificate should be directed to Carla Cornett, Edith Greer, or Maria Wood at  
(502) 564-6716

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



**HAZARDOUS MATERIALS  
CERTIFICATE OF REGISTRATION  
FOR REGISTRATION YEAR(S) 2019-2022**

**Registrant:** MIDWEST ENVIRONMENTAL TRANSPORT INC

ATTN: Kimberly Mattan  
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: 060419550117BD    Effective: July 1, 2019    Expires: June 30, 2022**

**HM Company ID: 20054**

**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.

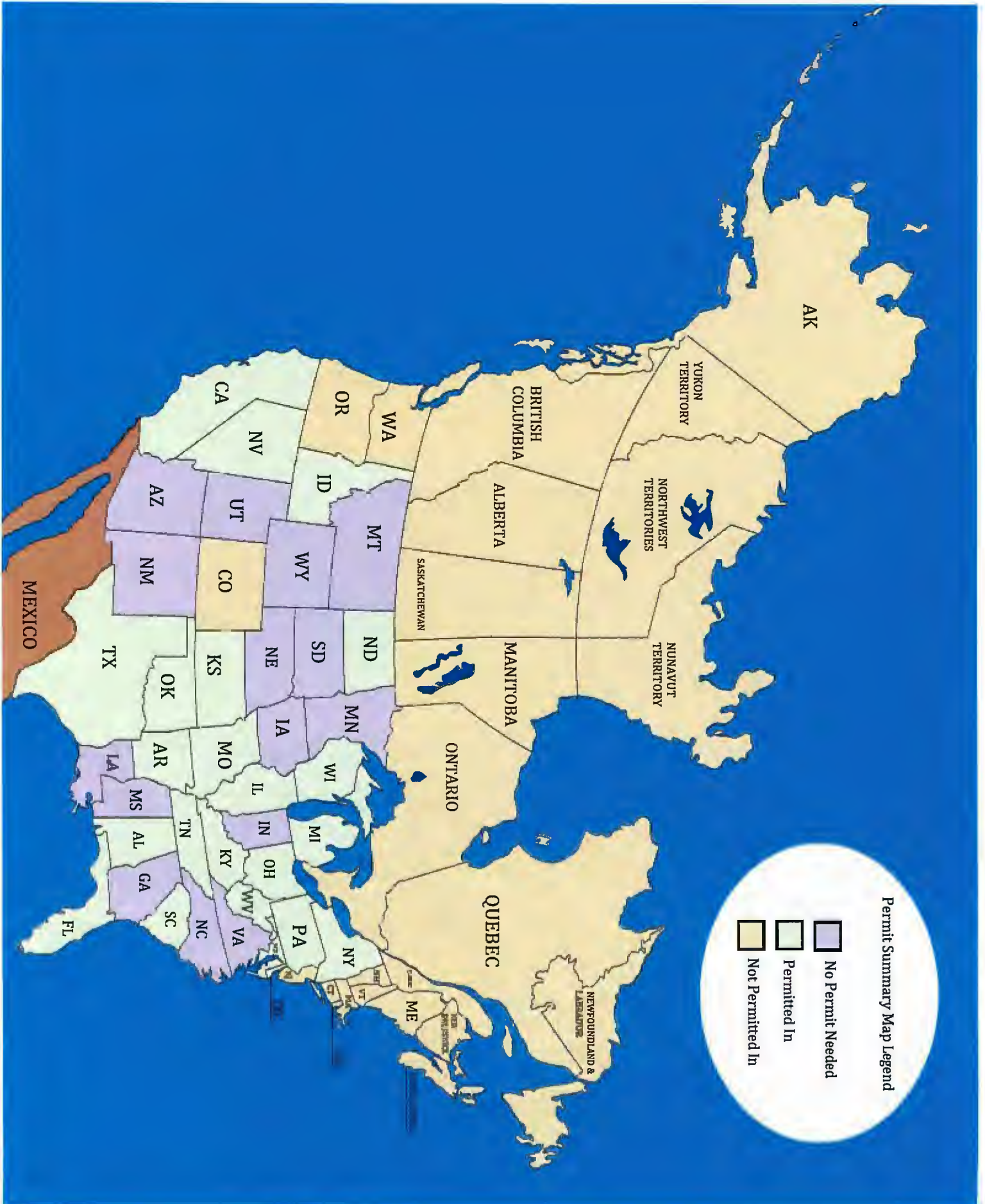
**Midwest Environmental Transport, Inc.**  
**Permit Information**



**STATE PERMITS HELD**

STATE	PERMIT #	EXPIRATION DATE
ALABAMA	OH0000000539	10/31/2021
ARKANSAS	H-1229	7/28/2021
CALIFORNIA REGISTRATION	3068	6/30/2022
CALIFORNIA LICENSE	139449	2/28/2022
COLORADO*	21HM0289891	6/29/2022
CONNECTICUT*	CT-HW-551	6/30/2025
DELAWARE HAZARDOUS	DE-HW-0323	12/31/2022
DELAWARE SOLID WASTE	DE-SW-0323	6/30/2025
FLORIDA	OH0000000539	11/30/2021
ILLINOIS*	S.W.H. # 2283	3/31/2023
INDIANA	01-SC-00017	PERMANENT
KANSAS	OH0000000539	12/31/2021
KENTUCKY	KYU 90716 HF94773	PERMANENT
MARYLAND*	HWH-492	12/31/2021
MICHIGAN	UPW-0333081-OH	4/1/2022
MICHIGAN LIQUID WASTE	LIW0333081MI	4/1/2022
MISSOURI*	08KI3001000	10/22/2021
NEVADA	UPW-0333081-OH	4/1/2022
NEW YORK*	OH-093	5/31/2022
NORTH DAKOTA	WH-0955	6/30/2026
OKLAHOMA	UPW-0333081-OH	4/1/2022
PENNSYLVANIA HAZ WASTE	PA-AH0368	11/30/2021
PENNSYLVANIA RESIDUAL*	WH3870	12/31/2021
SOUTH CAROLINA	OH0000000539	6/7/2024
TENNESSEE	OH0000000539	1/31/2022
TEXAS HAZARDOUS WASTE	OH0000000539	PERMANENT
TEXAS SOLID WASTE	41296	PERMANENT
VIRGINIA	OH00000005398	PERMANENT
WEST VIRGINIA	UPW-0333081-OH	4/1/2022
WISCONSIN	16057	9/30/2021

\*Vehicle Specific



Permit Summary Map Legend

- No Permit Needed
- Permitted In
- Not Permitted In





Mike DeWine, Governor  
Jon Husted, Lt. Governor  
Laurie A. Stevenson, Director

February 18, 2022

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

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

**Hazardous Waste Program - DERR**

**Subject: FCI Notice of Violation**

Dear Mr. McCabe:

On February 7, 2022, Environmental Enterprises, Inc. (EEI) located at 4650 Spring Grove Ave, Cincinnati, notified Ohio EPA about a fire at their facility on February 4, 2022. The fire was in a 40-cubic yard roll-off behind the facility. The Cincinnati Fire Department (CFD) was notified around 2:23 am, arrived on-site at 2:30 am and quickly extinguished the fire. Dan McCabe from EEI arrived shortly after the CFD cleared the site at around 3:30 am. Mr. McCabe made sure the site was secured before leaving the site. Due to winter weather conditions, EEI was closed on February 4, 2022, and did not reopen until February 7, 2022. The roll-off contained hazardous waste organic debris destined for incineration and was stored in secondary containment outside behind the facility. It appears the fire was self-ignition.

**Findings**

Based upon review of this information, Ohio EPA determined EEI was in violation of the following terms and conditions of EEI's permit issued on September 30, 2009, and Ohio's hazardous waste laws and rules:

- 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. EEI notified Ohio EPA on February 7, 2022, about the fire. **Therefore, this violation has been resolved.**

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  
February 18, 2022  
Page 2

- 2. Immediate reporting of Non-Compliance, Condition A.20 and OAC 3745-50-58(L)(6):** The Permittee must report orally to Ohio EPA's Office of Emergency Response within twenty-four (24) hours from the time the Permittee becomes aware of any noncompliance with this permit, ORC Chapter 3734 or the rules adopted thereunder, which may endanger human health or the environment, including (i) information concerning the release of any hazardous waste that may cause an endangerment to public drinking water supplies; and (ii) Any information of a release or discharge of hazardous waste or a fire or explosion from the hazardous waste facility, which could threaten the environment or human health outside the facility.

On February 4, 2022, during a winter storm EEI became aware of a roll-off fire behind their facility around 2:30 am. EEI failed to comply with Permit condition A.20 and OAC Rule 3745-50-58(L)(6) when they did not notify Ohio EPA within 24 hours of becoming aware of the fire. EEI notified Ohio EPA on February 7, 2022, about the fire. **Therefore, this violation has been resolved.**

Ohio EPA respectfully thanks you for your effort to resolve the violations. Please note that this does not preclude the Director from seeking administrative or civil penalties pursuant to Ohio Revised Code section 3734. for the violations noted in this notice of violation. The decision on whether to pursue or decline to pursue such penalties regarding these violations is dependent on several factors, one of which is the company's future compliance with Ohio EPA regulatory requirements.

Please be advised that this NOV/ROV is only associated with those areas of the operations that were reviewed and does not constitute a waiver of potential violations not discovered.

A copy of the inspection report including completed checklists 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: <https://epa.ohio.gov/wps/portal/gov/epa/divisions-and-offices/environmental-response-revitalization/guides-and-manuals>.

Should you have any questions, please contact me at (937) 285-6070 or [Jeff.Smith@epa.ohio.gov](mailto:Jeff.Smith@epa.ohio.gov).

Sincerely,

*Jeff Smith*

Jeff Smith, Southwest District Office  
Hazardous Waste Program  
Division of Environmental Response and Revitalization

JS/rw

ec: George Strobel, Southwest District Office, HW-DERR  
Zak Kabelen, Central Office, HW-DERR  
[EPA.RCRAInfoData@epa.ohio.gov](mailto:EPA.RCRAInfoData@epa.ohio.gov)





Mike DeWine, Governor  
Jon Husted, Lt. Governor  
Laurie A. Stevenson, Director

August 24, 2021

Mr. Daniel McCabe  
Environmental Enterprises, Inc.  
10163 Cincinnati-Dayton Road  
Cincinnati, OH 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 during Ohio EPA's August 12, 2021, Compliance Evaluation Inspection (CEI) of Environmental Enterprises, Inc. (EEI) located at 4650 Spring Grove Ave, Cincinnati, Ohio. The goal of this 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 adopted pursuant to ORC § 3734.12 found in Chapter 3745 of the Ohio Administrative Code (OAC) and the terms and conditions of EEI's permit issued on September 30, 2009. The inspection included a review of EEI's operations and written documentation that were requested by Ohio EPA associated with facility operations. EEI submitted the requested documentation to Ohio EPA on August 13, and August 19, 2021.

Ohio EPA found no violations of Ohio's hazardous waste laws, rules 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 the documentation reviewed and does not constitute a waiver of potential violations not discovered.

A copy of the inspection report including completed checklists 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: <https://epa.ohio.gov/derr/compliance>.

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  
August 24, 2021  
Page 2

Should you have any questions, please contact me at (937) 285-6070 or  
Jeff.Smith@epa.ohio.gov.

Sincerely,

*Jeff Smith*

Jeff Smith, Southwest District Office  
Hazardous Waste Program  
Division of Environmental Response and Revitalization

JS/rw

ec: George Strobel, Southwest District Office, HW-DERR  
Tammy McConnell, CO, HW-DERR  
EPA.RCRAInfoData@epa.ohio.gov



Mike DeWine, Governor  
Jon Husted, Lt. Governor  
Laurie A. Stevenson, Director

March 20, 2020

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 Pam Hull and me during Ohio EPA's March 3, 2020, Compliance Evaluation Inspection (CEI) of Environmental Enterprises, Inc. (EEI) located at 4650 Spring Grove Ave, Cincinnati, Ohio. The goal of this 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 adopted pursuant to ORC § 3734.12 found in Chapter 3745 of the Ohio Administrative Code (OAC) and the terms and conditions of EEI's permit issued on September 30, 2009. The inspection included a review of EEI's operations and written documentation associated with facility operations.

Ohio EPA found no violations of Ohio's hazardous waste laws and rules 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 the documentation reviewed and does not constitute a waiver of potential violations not discovered.

A copy of the inspection report including completed checklists 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: <https://epa.ohio.gov/derr/compliance>.

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



Environmental Enterprises Inc  
OHD083377010 - Inspection  
March 20, 2020  
Page 2 of 2

Should you have any questions, please contact me at (937) 285-6070 or  
Jeff.Smith@epa.ohio.gov.

Sincerely,

**UNSIGNED LETTER, WORKING REMOTELY – SIGNED COPY  
TO BE MAILED AFTER RETURN TO OFFICE**

Jeff Smith, Southwest District Office  
Hazardous Waste Program  
Division of Environmental Response and Revitalization

ec: George Strobel, Southwest District Office, HW-DERR  
Tammy McConnell, CO, HW-DERR  
EPA.RCRAInfoData@epa.ohio.gov

JS/bp



Mike DeWine, Governor  
Jon Husted, Lt. Governor  
Laurie A. Stevenson, Director

May 16, 2019

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 Pam Hull and me during Ohio EPA's April 30, 2019, Compliance Evaluation Inspection (CEI) of Environmental Enterprises, Inc. (EEI) located at 4650 Spring Grove Avenue, Cincinnati, Ohio. The goal of this 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 adopted pursuant to ORC § 3734.12 found in Chapter 3745 of the Ohio Administrative Code (OAC) and the terms and conditions of EEI's permit issued on September 30, 2009. The inspection included a review of EEI's operations and written documentation associated with facility operations.

The Ohio Environmental Protection Agency (Ohio EPA) found no violations of Ohio's hazardous waste laws and rules 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 the documentation reviewed and does not constitute a waiver of potential violations not discovered.

A copy of the inspection report including completed checklists 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: <https://epa.ohio.gov/derr/compliance>.

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





Environmental Enterprises Inc  
OHD083377010  
May 16, 2019  
Page 2 of 2

Should you have any questions, please contact me at (937) 285-6070 or  
[Jeff.Smith@epa.ohio.gov](mailto:Jeff.Smith@epa.ohio.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Smith".

Jeff Smith, Southwest District Office  
Hazardous Waste Program  
Division of Environmental Response and Revitalization

ec: George Strobel, Southwest District Office, HW-DERR  
Tammy McConnell, CO, HW-DERR  
[EPA.RCRAInfoData@epa.ohio.gov](mailto:EPA.RCRAInfoData@epa.ohio.gov)

JS/tmp



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

RECEIVED OCT 09 2018

CERTIFIED MAIL  
7005 2570 0001 6228 5514

October 4, 2018

Mr. Daniel McCabe  
Environmental Enterprises, Inc.  
4650 Spring Grove Avenue  
Cincinnati, Ohio 45241

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

**Hazardous Waste Program – DERR**

**Subject: CEI Notice of Violation**

Dear Mr. McCabe:

Thank you for accompanying Pam Hull and me during Ohio EPA's September 13, 2018, Compliance Evaluation Inspection (CEI) of Environmental Enterprises, Inc. (EEI) at 4650 Spring Grove Avenue, Cincinnati, Ohio. 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 adopted pursuant to ORC §3734.12 found in Chapter 3745 of the Ohio Administrative Code (OAC), and the terms and conditions of EEI's permit issued on September 30, 2009. Our inspection included a review of EEI's operations and written documentation associated with facility operations.

**Findings**

Ohio EPA observed the following violation of Ohio's hazardous waste laws and regulations and EEI's permit terms and conditions.

- 1. Permit Condition B.12 and OAC Rule 3745-54-35 Required Aisle Space:** At a minimum, the Permittee must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency.

During the inspection, a row of ten totes stacked two high were stored next to a designated row of containers in Area 17. The row of totes would not allow the unobstructed movement of personnel between the rows.

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



Mr. Daniel McCabe  
Environmental Enterprises Inc.  
October 4, 2018  
Page 2 of 2

During the inspection EEI relocated the totes. **Therefore, this violation has been resolved.**

**Conclusion**

Ohio EPA respectfully thanks you for your effort to resolve the violations. Please note that this does not preclude the director from seeking administrative or civil penalties pursuant to Ohio Revised Code section 3734. for the violation noted during the September 13, 2018 inspection. The decision on whether to pursue or decline to pursue such penalties regarding the violation is dependent on several factors, one of which is the company's future compliance with Ohio EPA regulatory requirements.

Please be advised that this Notice of Violation/Resolution of Violation (NOV/ROV) 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 completed checklists 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/derr/hazwaste.aspx>.

Should you have any questions, please contact me at (937) 285-6070, or [Jeffrey.Smith@epa.ohio.gov](mailto:Jeffrey.Smith@epa.ohio.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Smith", enclosed within a hand-drawn oval.

Jeff Smith, Southwest District Office,  
Hazardous Waste Program  
Division of Environmental Response and Revitalization

ec: George Strobel, Southwest District Office, HW-DERR  
Tammy McConnell, CO, HW-DERR  
[EPA.RCRAInfoData@epa.ohio.gov](mailto:EPA.RCRAInfoData@epa.ohio.gov)

JS/tsf





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

May 24, 2018

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 Pam Hull, George Strobel and me during Ohio EPA's May 2, 2018, Compliance Evaluation Inspection (CEI) of Environmental Enterprises, Inc. (EEI) at 4650 Spring Grove Ave, Cincinnati, Ohio. The goal of the 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 adopted pursuant to ORC §3734.12 found in Chapter 3745 of the Ohio Administrative Code (OAC), and the terms and conditions of EEI's permit issued on September 30, 2009. Ohio EPA's inspection included a review of EEI's operations and written documentation associated with facility operations.

Ohio EPA found no violations of Ohio's hazardous waste laws and 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/derr/hazwaste.aspx>.

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



Mr. Daniel McCabe  
Environmental Enterprises Inc.  
May 24, 2018  
Page 2 of 2

Should you have any questions, please contact me at (937) 285-6070 or  
Jeffrey.Smith@epa.ohio.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Smith', written over a faint circular stamp.

Jeff Smith, Southwest District Office  
Hazardous Waste Program  
Division of Environmental Response and Revitalization

ec: George Strobel, Southwest District Office, HW-DERR  
Tammy McConnell, CO, HW-DERR  
EPA.RCRAInfoData@epa.ohio.gov

JS/tsf



Kim Comerzan, MSN, RN, CNS *Health Officer/Director*  
Carl J. Schmidt, MD, MPH *Chief Medical Examiner/  
Medical Director*

May 7, 2019

Environmental Enterprises Inc.  
4650 Spring Grove Ave  
Cincinnati, OH 45232

To whom it may concern:

It is my pleasure to write this letter of enthusiastic recommendation for Environmental Enterprises, Inc. (EEI). The County of Monroe has worked with EEI for many years, and given the top tier level of service we continually receive, we hope to continue this wonderful working relationship for the foreseeable future.

We continue to work with EEI not just because of the level of expertise, responsiveness, and professionalism they bring to every job, but because of how they go above and beyond to be personable, upbeat, and quite simply, a joy to work with. Not only with my staff, but the public as well. After our large community collection events, we invariably receive feedback from the public on how positive, efficient, or effortless the whole experience was for them. This is the kind of feedback you really want to hear after such an event and is a testament to how EEI operates.

Again, I am happy to highly recommend the services of Environmental Enterprises, Inc. If you have any questions, please feel free to contact me.

Sincerely,

Dan Rock, Director  
Recycling and Green Community Program  
Monroe County Health Dept.

2353 S. Custer Road Monroe, Michigan 48161-9769 · (734) 240-7800 · Toll Free (888)354-5500 · Fax (734) 240-7816 · [www.co.monroe.mi.us/publichealth](http://www.co.monroe.mi.us/publichealth)



Ottawa · Sandusky  
Seneca County



JOINT  
SOLID WASTE  
MANAGEMENT  
DISTRICT

July 18, 2018

Letter of Recommendation

TIM WASSERMAN  
*Director*

tw@recycleooss.org

AMY DRUMMER  
*Assistant Director*

ad@recycleooss.org

JIM DARR  
*Recycling Specialist*

jdarr@recycleooss.org

JAMIE COLEMAN  
*Community Outreach  
Specialist*

jcoleman@recycleooss.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 these 10+ years, they have serviced more than 60 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.recycleooss.org](http://www.recycleooss.org)

Printed on Recycled Paper





July 19, 2018

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.

PRC has been utilizing the services and expertise of Environmental Enterprises, Inc. (EEI) from 2006 till present. During this time EEI has acted as our sole contractor at seventy-five collections throughout western PA. Our collections typically attract anywhere from 350 to 1,300 participants (one-day events) demonstrating the range and versatility of the company. EEI event staff is knowledgeable, efficient, cooperative, and works in safe manner.

PRC has come to trust EEI management 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 the issue in a timely and professional manner.

Feel free to visit our website [www.prc.org](http://www.prc.org) for our program information. Also feel free to contact me directly at (412) 488-7490 x213 or [michaels@prc.org](mailto:michaels@prc.org) with any questions or if you require additional information.

Sincerely,

Michael Stepaniak  
PA Resources Council  
Environmental Programs Coordinator



VANDERBURGH 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](http://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



**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 46 years' experience in the environmental industry.
- ◆ > 150 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.
- ◆ 33 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**

- ◆ > 150 Collection Events
- ◆ 25 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**

- ◆ 35 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



**Warren G. Taylor**  
**Director of Quality Assurance**

**Education / Training:**

- Master of Environmental Science Miami University,  
Oxford, Ohio August 1979  
B.A. Biology, Capital University, Columbus, OH May 1976
- ◆ OSHA 40-Hour HAZWOPER Training
  - ◆ OSHA 8-hour HAZWOPER Refresher Training
  - ◆ OSHA 8-hour HAZWOPER Supervisor Training
  - ◆ RCRA Compliance (40 CFR 264.16)
  - ◆ Hazardous Materials Transportation Training
  - ◆ Certified in First Aid and CPR

**HHW CONTRACT SKILLS AND EXPERIENCE**

- ◆ Worked >30 HHW collection events in Ohio and Indiana.
- ◆ >23 years supervisory and management experience with Hazardous Waste Disposal that process HHW waste
- ◆ 2 years' experience in hazardous materials as a field chemist in emergency response.
- ◆ 17 years' experience in training, DOT, Hazardous Materials Transportation

**Summary:**

A manager for over 22 years with 29 years of experience in the hazardous waste industry. Responsibilities/Skills/Experience include:

- ◆ Manager and supervisor of Quality Assurance Departments at Hazardous Waste Facilities.
- ◆ Responsible for approval and acceptance of inbound waste shipments to hazardous waste facility
- ◆ Responsible for approving facilities for outbound waste shipments from hazardous waste facility
- ◆ Supervised Quality Assurance lab at hazardous waste facility
- ◆ Wrote Sections of Hazardous Waste Facility Part B Permit Application
- ◆ Developed and presented training classes in Hazardous Materials Transportation, and Hazardous Waste Procedures.
- ◆ Field Chemist including field identification and hazard categorization analysis of unknown materials at cleanups of waste sites
- ◆ Lab packing and labeling for transportation of hazardous waste at university and hospital labs and industrial sites
- ◆ Supervised unpacking and processing lab packs at hazardous waste treatment facility
- ◆ Prepared Reports for TSD including Annual Hazardous Waste Report, Toxic Release Inventory (TRI) submitted to EPA and monthly monitoring reports of discharge to local POTW.

**Employment History:**

February 1986 - Present

**Director of Quality Assurance, Environmental Enterprises, Inc.** Cincinnati, OH.

Manage and supervise Q.A. department and lab personnel. Also responsible for approval and acceptance of inbound waste shipments and approving outbound waste facilities. Conduct safety meetings at HHW projects.

November 1983 - January 1986

**Quality Control Supervisor, CECOS International,** Williamsburg, OH.

January 1982 – October 1983

**Quality Control Chemist, Browning Ferris Industries,** Kansas City, MO.

December 1979 – October 1981

**Field Chemist, Wadsworth Testing Laboratory,** Canton, OH



**Michael D. Yeary**  
**Chemist**

**Education / Training:**

Course work towards Associate Degree of Applied Science in Industrial Laboratory Technology; University of Cincinnati

- ◆ Chemical Hygiene and Laboratory Standard Training
- ◆ OEPA – Chemical Analysis of Drinking Water

**HHW CONTRACT SKILLS AND EXPERIENCE**

- ◆ Lab Technician in Hazardous Waste Storage and Treatment Facility
- ◆ Categorization and profiling of waste to determine proper treatment and disposal methods
- ◆ Lab analysis for various contaminants received in the facility
- ◆ >150 Collection Events
- ◆ Fluent in all Inorganic Wet Chemistry Analysis
- ◆ Fluent in Sample Preparation Procedures
- ◆ Knowledgeable in Waste Characterization, Analysis, and Profiling Procedures

**Summary:**

Over 34 years of experience in laboratory procedures including sample collection and analysis for wastewater, drinking water, soil and air (including industrial hygiene). Is fluent in all wet chemistry methods including the analysis of BOD, COD, cyanide, hexavalent chromium, ammonia, oil & grease, residues, MBAS, pH, and phosphorus. Responsibilities/Duties/Experience include:

- ◆ Development of EEI's internal lab procedures
- ◆ Development of EEI's QA/QC policies for wet lab
- ◆ Served as technician in the Metals Laboratory
- ◆ Knowledge in operation and interpretation of samples analyzed using atomic absorption
- ◆ Knowledge of Inductively Coupled Plasma (ICP) spectrophotometry techniques.
- ◆ Technical Writing including Standard Operating Procedures
- ◆ Laboratory Trainer – Wet Chemistry Analysis

**Employment History:**

December 1988-Present

**Department Manager – Wet Chemistry Lab, Environmental Enterprises, Inc., Cincinnati, OH**

As Department Manager, is responsible for the oversight, training, scheduling and coordination of all personnel involved in wet chemistry analysis. Also responsible for QA/QC, sample preparation and sample analysis for this department. Responsible for maintenance and calibration of all lab instrumentation and assists in training and evaluation of personnel during operation of the equipment.



**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

**CONTRACT SKILLS AND EXPERIENCE**

- ◆ 27 years' experience in segregation, transportation, packaging and manifesting hazardous waste.
- ◆ Project Management
- ◆ Remedial Activities
- ◆ Emergency Response Management
- ◆ Household Hazardous Waste Management
- ◆ Lab Pack Projects
- ◆ Sampling Techniques

**Summary:**

Mr. Boyer joined Environmental Enterprises, Inc. (EEI) in September 1992 and has more than 24 years' experience in the environmental industry. As Field Services Manager at EEI, Mr. Boyer oversees the daily design and implementation of EEI's remediation and emergency response techniques.

As Field Services Manager and Contract Manager for the Lab Pack Division, Mr. Boyer's project experience includes vessel cleanout, emergency spill response, Household Hazardous Waste events, lab packing, drum sampling, over-packing, and transportation of hazardous waste. His responsibilities for these projects also include project scheduling, staffing, budget oversight, developing safety procedures, selecting personal protective equipment, and ensuring the safety of site personnel and the public.

Mr. Boyer has extensive hands-on corrective action experience. This included the ability to assess a release of hazardous materials and develop efficient, cost-effective, environmentally sound remedial actions. He has expertise in developing methods in the field to minimize the impact of an environmental release. This includes the ability to mobilize personnel and equipment, while coordinating transportation and disposal efforts in a timely manner. He has extensive experience in the use of Level B and C personal protective equipment.

As a former Approval Chemist for EEI's TSDF, Mr. Boyer has extensive experience in profiling and reviewing waste streams, RCRA regulations, and DOT requirements.

**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**

- ◆ >130 Collection Events
- ◆ Segregation of Household Hazardous Waste
- ◆ Labeling and Manifesting HHW Waste
- ◆ Project Management

**Summary:**

With of 38 years' experience with administrative duties including invoicing, bid and quote preparations, budget management, traffic coordinator, and 19 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

## **Fall 2022**

### **Household Hazardous Waste Collection Proposal**

#### **Part II: Site Set-up**

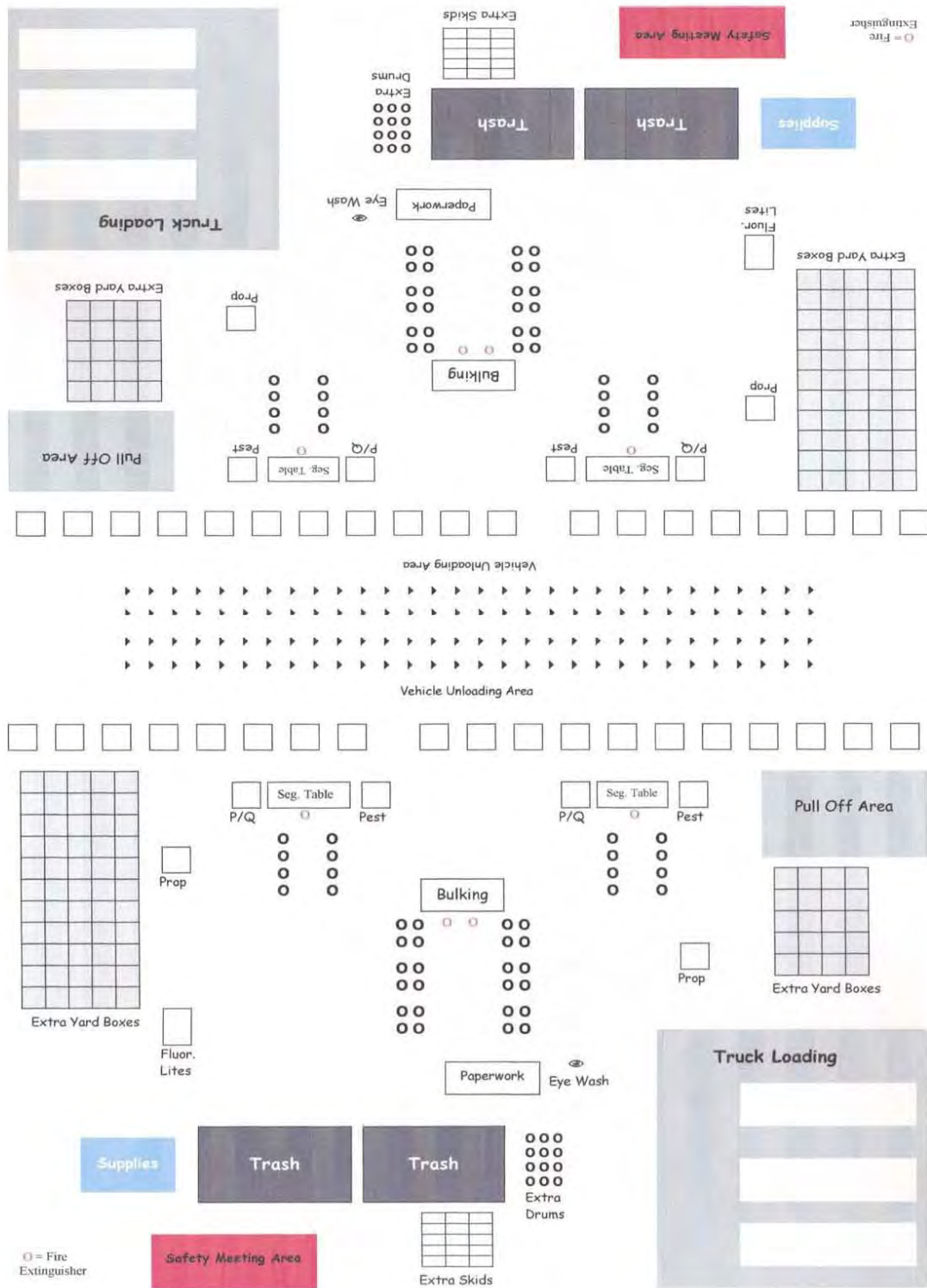
The event will take place at the LFUCG old landfill pad, located at 1631 Old Frankfort Pike, Lexington, KY. Cars will enter the site through Jimmie Campbell Drive and exit on Old Frankfort Pike. (Aerial photo of site is attached).

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.



**RFP #44-2022 Household Hazardous Waste Collection Event**  
**Lexington-Fayette Urban County Government**







### **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 #	Total Weight
Quantity	Size	Physical State	B/LP	Profile #	Name of Material		
		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	HHTICN	Trichloroisocyanuric Acid		
	5	DF	LP	HHLITR	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	HHTXLP	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	HHPbac	Batteries filled with acid, 8		
	55	DM	B	HHASB	Asbestos, 9		
	55	DM	B	HHBALL	PCB Solid, 9		
	5	DF	LP	HHLIBT	Lithium Batteries		
	5	DF	LP	HHSMOK	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		





## 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 Ridgour  
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 38<sup>th</sup> 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)

### Permafrix 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

### **Permafrix 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 9<sup>th</sup> 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 9<sup>th</sup> 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 9<sup>th</sup> 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 HHW 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 EEI'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 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 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 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 Manger, 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. EET 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**

<b>Task</b>	<b>Hazard</b>	<b>Minimum PPE</b>
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





## 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**

## Household Hazardous Waste Collection Events Proposal

### Part III: Pricing

The Total Disposal Cost (Part III- Household Hazardous Waste Collection Proposal Price Sheet) should be calculated by using the quantities listed below. The amounts listed below are estimates for price comparison only and are not guaranteed. Note: the quantities are specified in **pounds**, the preferred pricing method, unless otherwise stated. Respondents should also specify in their pricing the amount to be remitted/credited to the LFUCG (if any) for any items that have marketable value such as lead acid batteries.

The estimated amounts on the Pricing Sheet are to be used by LFUCG to compare proposals. The actual characterization of the material collected at the event will likely be different. See Tables 1 – 11 for previous collection totals.

The pricing will go into effect and be used for any future events planned by the LFUCG while the agreement with the selected vendor is in place.

<b>Product category</b>	<b>Amount</b>	<b>Price per unit</b>	<b>Total Cost</b>
Antifreeze	3,200 lbs	\$0.22	\$704.00
Flammable Solvents Liquids	6,000 lbs	\$0.23	\$1,380.00
Lab Packs for Treatment/Incineration and Lab Pack Reactives	2,700 lbs	\$1.28	\$3,456.00
NON-LATEX Paint Related Material (Processable 1 & 5 gallon containers, and non-processable pints and quarts)	110,000 lbs.	\$0.23	\$25,300.00
Mercury	50 lbs.	\$40/Min \$250	\$2,000.00
Fertilizers & Pesticides	13,000 lbs.	\$1.69	\$21,970.00
Waxes, Joint Compounds, Latex Adhesives	16,000 lbs.	\$0.75	\$12,000.00
Consumer Commodity Flammables	10,000 lbs.	\$1.28	\$12,800.00
Aerosol Cans	5,000 lbs.	\$1.00	\$5,000.00
Non-Motor Oil Used Oils	7,500 lbs.	\$0.20	\$1,500.00
Corrosives	2,000 lbs.	\$1.28	\$2,560.00
Fluorescent bulbs	16,000 feet	\$0.25 ft.	\$4,000.00
PCB Ballast	100 lbs	\$2.90	\$290.00
Propane cylinders	1,000 x 1 lb 100 x 20 lb	\$4.00 \$16.50	\$4,000.00 \$1,650.00
Total Set Up & Mobilization/Demobilization Cost			\$11,000.00
Total Miscellaneous Charges (please detail in below chart)			\$9,465.00
Total Labor Charges			\$0.00

Total Cost:   \$119,075

Please complete unit price, total cost per category, and total cost of all categories added together.

For example, 2,000 lbs antifreeze @ \$0.12/lb = \$240.00

Please list any additional miscellaneous charges in the below chart:

Item	Estimated amount	Price per item or pound	Total estimate
Isocyanate Cylinder	3	\$1,600.00 each	\$4,800.00
Freon Cylinder	6	\$25.00 each	\$150.00
Fire Extinguisher	50	\$10.00 each	\$500.00
Carbon Dioxide Cyl	2	\$10.00 each	\$20.00
Helium Cylinder	10	\$10.00 each	\$100.00
Foaming Aerosols	200	\$12.00 lb.	\$2,400.00
E-Cigarettes	3	\$5.50 lb./Min \$275	\$275.00
Reactives	40	\$4.00 lb./Min \$225	\$225.00
DWW	0	\$11.50 lb./Min \$225	\$225.00
Resins	140	\$5.50 lb.	\$770.00



**ADDENDUM #1**

RFP Number: #44-2022

Date: July 26, 2022

Subject: Hazardous Household Waste Collection Event

Address inquiries to:  
Sondra Stone  
sstone@lexingtonky.gov

**TO ALL PROSPECTIVE SUBMITTERS:**

**Please be advised of the following clarifications to the above referenced RFP:**

1. See attached manifest and pricing from last fall event.
2. During the last fall event, 1,288 attending cars come through for service. A total of 71 tons of hazardous waste material were collected at that 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:



Please print or type.

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V50

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number  
**EXEMPT**

2. Page 1 of  
**6**

3. Emergency Response Phone  
**(800) 424-9300**

4. Manifest Tracking Number  
**021666472 JJK**

5. Generator's Name and Mailing Address  
**EEL-LFUCG - City Dept.  
1631 Old Frankfort Pike  
Lexington, KY 40504**

Generator's Site Address (if different than mailing address)

Generator's Phone: **(859) 387-4948**

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  
**OH D083377010**

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	<b>UN1057, Lighters, 2.1</b> <i>SR</i>							None
X	<b>UN1978, Propane, 2.1</b>							None
X	<b>UN1954, Waste Compressed gas, flammable, n.o.s., 2.1 (Nitrous Oxide)</b> <i>36691</i>	<i>21-36689-90</i>	<i>002 CF</i>	<i>00600</i>	<i>P</i>			None
X	<b>UN1978, Propane, 2.1</b> <i>SR</i>							None

14. Special Handling Instructions and Additional Information  
**1. HHLTR ERG # 115**  
**2. HHPROP ERG # 115 2Xyd (8X20, 253X1)**  
**3. HHCOMPFL ERG # 115 1X5 (404)**  
**4. HHPROP ERG # 115**  
**EEL Work Order # 04-153505**  
**Emergency Contact: CHEMTREC (800) 424-9300 or (703) 527-3887 CCN836231**

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/Offero's Printed/Typed Name: **STEVEN RUBERG** Signature: *[Signature]* Month: **10** Day: **22** Year: **21**

16. International Shipments  Import to U.S.  Export from U.S. Port of entry/exit: \_\_\_\_\_ Date leaving U.S.: \_\_\_\_\_

17. Transporter Acknowledgment of Receipt of Materials  
 Transporter 1 Printed/Typed Name: **Ronald Clark** Signature: *[Signature]* Month: **10** Day: **22** Year: **21**  
 Transporter 2 Printed/Typed Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Month: \_\_\_\_\_ Day: \_\_\_\_\_ Year: \_\_\_\_\_

18. Discrepancy  
 18a. Discrepancy Indication Space  Quantity  Type  Residue  Partial Rejection  Full Rejection

18b. Alternate Facility (or Generator) Manifest Reference Number: \_\_\_\_\_ 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)  
 1. \_\_\_\_\_ 2. **H050** 3. **H141** 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: **Claire Doyle** Signature: *[Signature]* Month: **10** Day: **28** Year: **21**



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Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	21. Generator ID Number <b>EXEMPT</b>	22. Page <b>2 of 6</b>	23. Manifest Tracking Number <b>021666472JJK</b>
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24. Generator's Name  
**EEL - LFUGG  
1631 Old Frankfort Pike  
Lexington, KY 40504**

25. Transporter 1 Company Name  
**Midwest Environmental Transport, Inc.**

U.S. EPA ID Number  
**OH0000000539**

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	<del>UN1950, Aerosols, flammable, n.o.s., 2.1 LTD. QTY. (each not exceeding 1 L capacity)</del> <i>OK</i>						None
X	UN1954, Compressed gas, flammable, n.o.s., (Map Gas Cylinder), 2.1 <i>21-30692</i>	001	DF	0012	P		None
X	<del>UN1950, Aerosols, flammable, n.o.s., 2.1 LTD. QTY. (each not exceeding 1 L capacity)</del> <i>OK</i>						None
X	<del>UN1046, Helium, compressed, 2.2</del> <i>OK</i>						NONE
X	UN1044, Fire extinguishers, 2.2 <i>36693</i>	001	DF	0090	P		None
X	UN1856, Compressed gas, n.o.s., (Polymorphic MDH), 2.2 <i>36694 (Carbon Dioxide)</i>	001	DF	0010	P		None
X	UN1856, Compressed gas, n.o.s., (Freon), 2.2 <i>36695</i>	001	CF	0500	P		NONE
X	UN1072, Oxygen, compressed, 2.2 (5.1) <i>36696</i>	001	DF	0040	P		NONE
X	UN1856, Compressed gas, n.o.s., 2.2 (Nitrogen) <i>36697</i>	001	DF	0006	P		None
X	<del>UN1988, Flammable liquids, n.o.s., (kerosene, gasoline), 3, PGI</del> <i>OK</i>						None

GENERATOR

32. Special Handling Instructions and Additional Information

5. HHAERO ERG # 128	8. HHHELIUM ERG # 121	12. HHOXYGEN ERG # 122 <i>1X30(4)</i>
6. HHMAPPG ERG # 115 <i>1X5(7)</i>	9. HHFX ERG # 126 <i>1X5(29)</i>	13. HHCOMP ERG # 126 <i>1X5(1)</i>
7. HHAEROFM ERG # 128	10. HHFCAM ERG # 126 <i>1X5(2)</i>	14. HHBFL ERG # 128
	11. HHHEREON ERG # 126 <i>1X4(25X20, 1X1)</i>	

Emergency Contact:  
**CHEMTREC  
(800) 424-9300  
CCN838231**

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)

<b>H050</b>	<b>H141</b>
<b>H141</b>	<b>H070</b>
<b>H141</b>	<b>H141</b>

TRANSPORTER

DESIGNATED FACILITY

Please print or type.

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UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator ID Number

EXEMPT

22. Page

3 of 6

23. Manifest Tracking Number

0216660472-JJK

24. Generator's Name

EEL - LFUCG  
1631 Old Frankfort Pike  
Lexington, KY 40504

25. Transporter Company Name

Midwest Environmental Transport, Inc.

U.S. EPA ID Number

OH0000000539

26. Transporter Company Name

U.S. EPA ID Number

27a. 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 15 ~~UN1866, Resin solution, flammable, 3, PGI~~ *SL*

None

X 16 ~~UN1863, Flammable liquids, n.o.s., (kerosene, gasoline), 3, PGI~~ *SL*

None

X 17 ~~UN1263, Paint, 3, PGI LTD. QTY. (Aluminum Paint)~~ *SL*

None

X 18 UN1263, Paint, 3, PGI LTD. QTY. (Household Paint)

*21-36698*

*001 CF 0600 P*

None

X 19 ~~PG, UN3024, Pesticides, liquid, flammable, toxic, n.o.s., (methylion chlordane), 3 (6.1), PGI~~ *SL*

None

X 20 UN1863, Flammable liquids, n.o.s., (paint, paint thinner), 3, PGI

*36699-00*

*002 DF 0200 P*

None

X 21 UN1325, Flammable solids, organic, n.o.s., (magnesium metal), 4.1 PGI

*36702*

*001 DF 0010 P*

None

X 22 ~~UN3049, Water reactive solid, n.o.s., (Calcium Carbide, Sodium), 4.3, PGI~~ *SL*

None

X 23 ~~UN1472, Oxidizing solid, n.o.s., (chlorine), 5.1, PGI~~ *SL*

None

X 24 ~~UN3438, Oxidizing liquid, n.o.s., (hypochlorite solution), 5.1, PGI~~ *SL*

None

32. Special Handling Instructions and Additional Information

15. HHRESINS ERG # 127

18. HHPNT

ERG # 127 *IXYd*

22. HDDWW

ERG # 138

16. HHBFL ERG # 128

19. HHPLIQ

ERG # 131

23. HHOXLP

ERG # 140

17. HHALUM ERG # 127

20. HHFLP

ERG # 128 *IXY55*

24. HHOXLPL

ERG # 140

21. HHESLP

ERG # 133 *IX5*

Emergency Contact:

CHEMTREC

(800) 424-9300

CCN838231

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)

H110

H061

H141

GENERATOR

TRANSPORTER

DESIGNATED FACILITY

Please print or type.

Form Approved. OMB No. 2050-0039

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UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	21. Generator ID Number <b>EXEMPT</b>	22. Page <b>4 of 6</b>	23. Manifest Tracking Number <b>021666472JJK</b>
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24. Generator's Name  
**EEL - LFUCG  
1631 Old Frankfort Pike  
Lexington, KY 40504**

25. Transporter  Company Name  
**Midwest Environmental Transport, Inc.**

U.S. EPA ID Number  
**OH0000000539**

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	<del>25 UN2466, Trichloroisocyanuric acid, dry (Trichloroisocyanuric Acid), 5.1, PGII</del> <b>9R</b>					None	
X	<del>26 UN2486, Organic peroxide type D, liquid, (methyl ethyl ketone peroxide), 5.2</del> <b>9R</b>					None	
X	<del>27 RG, UN2568, Pesticides, solid, toxic, n.o.s., (dalzinon, sevin), 6.1, PGII</del> <b>9R</b>					None	
X	<del>28 UN2811, Toxic solids, organic, n.o.s., (trichlorophenol, pentachlorophenol), 6.1, PGII</del> <b>9R</b>					None	
X	29 UN3080, Isocyanates, toxic, flammable, n.o.s., 6.1 (3), PGII <b>21-30703</b>	001	DF	0075	P	None	
X	<del>30 UN3280, Toxic solid, inorganic, n.o.s., (lead, chromium), 6.1, PGII</del> <b>9R</b>					None	
X	<del>31 UN3282, Toxic solid, inorganic, n.o.s., (nickel cadmium battery), 6.1, PGII</del> <b>9R</b>					None	
X	<del>32 UN4588, Cyanides, inorganic, solid, n.o.s., 6.1, PGII</del> <b>9R</b>					None	
X	<del>33 RG, UN2809, Mercury, 6.1 (6.1), PGII</del> <b>9R</b>					None	
X	<del>34 UN3286, Corrosive liquid, basic, inorganic, n.o.s., (sodium hydroxide, potassium hydroxide), 8, PGII</del> <b>9R</b>					None	

32. Special Handling Instructions and Additional Information

25. HHTICN	ERG # 140	28. HHDIQX	ERG # 154	32. HHCYAN	ERG # 157	<b>Emergency Contact: CHEMTREC (800) 424-9300 CCN836231</b>
26. HHOPER	ERG # 145	29. HHISO	ERG # 155 <b>IX10</b>	33. HHMERC	ERG # 172	
27. HHPSOL	ERG # 151	30. HHTXLP	ERG # 151	34. HHALLP	ERG # 154	
		31. HHNICD	ERG # 151			

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)

**H141**

GENERATOR

TRANSPORTER

DESIGNATED FACILITY

Please print or type.

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<b>UNIFORM HAZARDOUS WASTE MANIFEST</b> (Continuation Sheet)		21. Generator ID Number <b>EXEMPT</b>	22. Page <b>5 of 6</b>	23. Manifest Tracking Number <b>0216ldo472 JJK</b>		
24. Generator's Name <b>EEL - LFUCG 1631 Old Frankfort Pike Lexington, KY 40504</b>						
25. Transporter <u>1</u> Company Name <b>Midwest Environmental Transport, Inc.</b>				U.S. EPA ID Number <b>OH0000000539</b>		
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	<del>35 RC, UN2754, Batteries, wet, filled with acid, 8, PGIII</del> <b>SR</b>					None
X	<b>36 RC, UN3264, Corrosive liquid, acidic, inorganic, n.o.s. (hydrochloric acid, sulfuric acid), 8, PGII</b> <b>21-3670304</b>	<b>002</b>	<b>DF</b>	<b>0100</b>	<b>P</b>	None
X	<del>37 UN3090, Lithium metal batteries including lithium alloy batteries, lithium batteries, 9, PGII</del> <b>SR</b>					None
X	<del>38 UN3091, Lithium metal batteries contained in equipment including lithium alloy batteries, 9, PGII</del> <b>SR</b>					None
X	<del>39 NA2212, Asbestos, 9, PGIII</del> <b>SR</b>					None
	<del>40 Non-regulated (fluorescent lamps)</del> <b>SR</b>					Universal
	<del>41 Non-regulated (Fire Fighting Foam)</del> <b>SR</b>					None
	<del>42 Non-regulated (household batteries)</del> <b>SR</b>					None
	<del>43 Non-regulated (antifreeze)</del> <b>SR</b>					None
	<del>44 Non-regulated (Non-PCB Light Ballast)</del> <b>SR</b>					None
32. Special Handling Instructions and Additional Information						
35. HHPBAC ERG # 154		38. HHECIG		42. HHBAT		
36. HHACLP ERG # 154 <b>2155</b>		39. HHASB ERG # 171		43. HHANTI		
37. HHLIBT ERG # 138		40. HHFLOR		44. HHHBALL		
37. HHLIBT ERG # 138		41. HHAEFF		<b>Emergency Contact:</b> <b>CHEMTREC</b> <b>(800) 424-9300</b> <b>CCN836231</b>		
33. Transporter _____ Acknowledgment of Receipt of Materials						
Printed/Typed Name			Signature			
34. Transporter _____ Acknowledgment of Receipt of Materials						
Printed/Typed Name			Signature			
35. Discrepancy						
36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
<b>H070</b>						

GENERATOR

TRANSPORTER

DESIGNATED FACILITY

Please print or type.

Form Approved. OMB No. 2050-0039

7965

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	21. Generator ID Number <b>EXEMPT</b>	22. Page <b>6 of 6</b>	23. Manifest Tracking Number <b>021666472JJK</b>
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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  
**OH0000000539**

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				
	<del>45 Non-regulated (household cleaners)</del> <i>92</i>					None	
	<del>46 Non-regulated (fluorescent lamps)</del> <i>92</i>					Universal	
	<del>47 Non-regulated (putty and adhesives)</del> <i>21-36705</i>	001	DF	0050	P	None	
	<del>48 Non-regulated (oil fillers)</del> <i>92</i>					None	
	<del>49 Non-regulated (used oil)</del> <i>36706-08</i>	003	DM	0125	G	None	
	<del>50 Non-regulated (used oil)</del> <i>92</i>					None	
	<del>51 Non-regulated (Smoke Detectors)</del> <i>92</i>					None	
	52						
	53						
	54						

32. Special Handling Instructions and Additional Information

45. HHCLNR  
46. HHFLOR  
47. HHPUTY *IX55*

48. HHOFIL  
49. HHOIL *3X55*  
50. HHOIL  
51. HHSMOK

Emergency Contact:  
**CHEMTREC  
(800) 424-9300  
CCN836231**

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)

*H110* *H111*

GENERATOR

TRANSPORTER

DESIGNATED FACILITY



Please print or type.

796E V54

Form Approved. OMB No. 2050-0039

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>	1. Generator ID Number <b>EXEMPT</b>	2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>(800) 424-9300</b>	4. Manifest Tracking Number <b>021666470 JJK</b>
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5. Generator's Name and Mailing Address  
**EEL-LEUCG**  
**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**

Facility's Phone: **(513) 541-1823**

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		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type					
X	<b>RQ, UN1263, Paint, 3, PGII LTD. QTY. (Household Paint)</b> <i>21-36251-02</i>	052	CF	31500	P	None		
	<b>Non-regulated (putty and adhesives)</b> <i>36303-08</i>	006	CF	4200	P	None		
	3.							
	4.							

14. Special Handling Instructions and Additional Information  
**1. HHPNT ERG # 127**  
**2. HHPUTY**

**EEL Work Order # 04-153505**

**Emergency Contact:**  
**CHEMTRAC (800) 424-9300 or**  
**(703) 527-3887 CCN636231**

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  
*[Signature]*

Month Day Year  
**10 23 21**

TRANSPORTER

16. International Shipments  Import to U.S.  Export from U.S.

Port of entry/exit:  
Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name  
**James Crawford**

Signature  
*[Signature]*

Month Day Year  
**10 23 21**

Transporter 2 Printed/Typed Name

Signature

Month Day Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space  Quantity  Type  Residue  Partial Rejection  Full Rejection

Manifest Reference Number:

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. **H110** 2. **H110** 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  
*[Signature]*

Month Day Year  
**10 27 21**

296E

V62

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number <b>EXEMPT</b>	2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>(800) 424-9300</b>	4. Manifest Tracking Number <b>021666468 JJK</b>
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5. Generator's Name and Mailing Address  
**EEL - LFUCG**  
**1631 Old Frankfort Pike**  
**Lexington, KY 40504**  
Generator's Phone: **(859) 387-4848**

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  
**OH D083377010**

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	<b>RQ, UN1283, Paint, 3, PGII LTD. QTY. (Household Paint)</b> <b>21-35912-71</b>	<b>060</b>	<b>CF</b>	<b>391000</b>	<b>P</b>	<b>None</b>		
	<b>Non-regulated (putty and adhesives)</b> - Void - material Not on Truck					<b>None</b>		

14. Special Handling Instructions and Additional Information  
**1. HHPNT ERG # 127 Coxyd**  
**2. HHPUTY**  
**EEL Work Order # 04-153505**  
**Emergency Contact: CHEMTREC (800) 424-9300 or (703) 527-3887 CCN830231**

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  
**STERN RUBERG**  
Signature  
  
Month Day Year  
**10 23 12**

16. International Shipments  
 Import to U.S.  Export from U.S.  
Port of entry/exit:  
Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name  
**Harold A. Jones II**  
Signature  
  
Month Day Year  
**10 23 12**

Transporter 2 Printed/Typed Name  
Signature  
Month Day Year

18. Discrepancy

18a. Discrepancy Indication Space  
 Quantity  Type  Residue  Partial Rejection  Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator)  
U.S. EPA ID Number

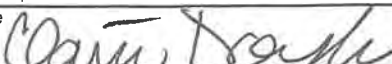
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)  
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. **H110** 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  
**Claire Doyle**  
Signature  
  
Month Day Year  
**10 25 12**

GENERATOR

TRANSPORTER INTL

DESIGNATED FACILITY

Please print or type.

796E 1261

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number <b>EXEMPT</b>	2. Page 1 of <b>2</b>	3. Emergency Response Phone <b>(800) 424-9300</b>	4. Manifest Tracking Number <b>021666725 JJK</b>
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5. Generator's Name and Mailing Address  
**EET - LFUCG**  
**1631 Old Frankfort Pike**  
**Lexington, KY 40504**  
Generator's Phone: **(859) 367-4918**

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.**  
**4850 Spring Grove Avenue**  
**Cincinnati, OH 45232**  
Facility's Phone: **(513) 541-1823**

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		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type					
X	UN1263, Paint, 3, PGII-LTD-QTY. (Household Paint) <i>SR</i>					None		
X	UN1993, Flammable liquids, n.o.s., (kerosene, gasoline), 3, PGII <i>2/36/57</i>	001	DF	0050	G	None		
	Non-regulated (fluorescent lamps) <i>36/58</i>	001	CW	0220	P	Universal		
	Non-regulated (used oil) <i>SR</i>					None		

14. Special Handling Instructions and Additional Information  
**1. HHPNT ERG # 127**  
**2. HHBFL ERG # 128 IX55**  
**3. HHFLOR IXSKID**  
**4. HHOIL**  
**EET Work Order # 04-16293**  
**Emergency Contact: 153505 CHEMTREC (800) 424-9300 or (703) 527-3887 CCN536231**

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/Offendor's Printed/Typed Name  
**SHERI RUBERG**  
Signature  
*[Signature]*  
Month Day Year  
**10 23 21**

16. International Shipments  
 Import to U.S.  
 Export from U.S.  
 Port of entry/exit:  
 Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name  
**DAN McCaule**  
Signature  
*[Signature]*  
Month Day Year  
**10 23 21**

Transporter 2 Printed/Typed Name  
Signature  
Month Day Year

18. Discrepancy

18a. Discrepancy Indication Space  
 Quantity  
 Type  
 Residue  
 Partial Rejection  
 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. **H** 2. **H061** 3. **H1141** 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  
**Claire Doyle**  
Signature  
*[Signature]*  
Month Day Year  
**10 26 21**



Please print or type.

7965

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	21. Generator ID Number <b>EXEMPT</b>	22. Page <b>2 of 2</b>	23. Manifest Tracking Number <b>021666725JJK</b>
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24. Generator's Name  
**EEL LFUCG  
1631 Old Frankfort Pike  
Lexington, KY 40504**

25. Transporter Company Name  
**Midwest Environmental Transport, Inc.**

U.S. EPA ID Number  
**OH0000000539**

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					
5	Non-regulated (antifreeze)	001	TP	0080	G	None		
6								
7								
8								
9								
10								
11								
12								
13								
14								

GENERATOR

32. Special Handling Instructions and Additional Information  
**5 HHANTI IN TOTE 21-36159**

Emergency Contact:  
**CHEMTRAC  
(800) 424-9300  
CCN836231**

33. Transporter Acknowledgment of Receipt of Materials  
Printed/Typed Name: **DAN McCabe** Signature: *[Signature]* Month: **10** Day: **23** Year: **21**

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**

TRANSPORTER

DESIGNATED FACILITY

7965 V52

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Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number <b>EXEMPT</b>	2. Page 1 of <b>6</b>	3. Emergency Response Phone <b>(800) 424-9300</b>	4. Manifest Tracking Number <b>021666474 JJK</b>
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5. Generator's Name and Mailing Address: **EEL Work**  
**1631 Old Frankfort Pike**  
**Lexington, KY 40504**  
 Generator's Site Address (if different than mailing address):  
**(850) 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**  
 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		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type					
X	<del>UN1057, Lighters, 2.1</del> <b>ER</b>					None		
X	<b>UN1978, Propane, 2.1</b>					None		
X	<del>UN1954, Waste Compressed gas, flammable, n.e.s., 2.1</del> <b>ER</b>					HHW		
X	<b>UN1978, Propane, 2.1</b>					None		

14. Special Handling Instructions and Additional Information:  
**1. HMLTK ERG # 115**  
**2. HHPROP ERG # 115**  
**3. HHCOMPFL ERG # 115**  
**4. HHPROP ERG # 115**  
**EEL Work Order # 04-153505**  
**Emergency Contact: CHEMTREC (800) 424-9300 or (703) 527-3887 CCN830231**

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/Offorer's Printed/Typed Name: **SHERI RUBERG** Signature: *[Signature]* Month: **10** Day: **23** Year: **21**

TRANSPORTER

16. International Shipments:  Import to U.S.  Export from U.S. Port of entry/exit: *[Signature]* Date leaving U.S.: *[Signature]*

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: **Eugene & Joering Jr** Signature: *[Signature]* Month: **10** Day: **23** Year: **21**

Transporter 2 Printed/Typed Name: Signature: *[Signature]* Month: Day: Year:

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space:  Quantity  Type  Residue  Partial Rejection  Full Rejection

18b. Alternate Facility (or Generator): Manifest Reference Number: 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)

1. 2. **H050** 3. 4. **H050**

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: **Claire Doyle** Signature: *[Signature]* Month: **10** Day: **25** Year: **21**

Please print or type.

296E

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UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	21. Generator ID Number <b>EXEMPT</b>	22. Page <b>2 of 6</b>	23. Manifest Tracking Number <b>02116160474 JJK</b>
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24. Generator's Name  
**EEL - LFUGG  
1631 Old Frankfort Pike  
Lexington, KY 40504**

25. Transporter  Company Name  
**Midwest Environmental Transport, Inc.**

U.S. EPA ID Number  
**OH0000000539**

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 UN1950, Aerosols, flammable, n.o.s., 2.1 LTD. QTY. (each not exceeding 1 L capacity) <b>21-35974-76</b>	003	CF	1500	P	None		
X	6 <del>UN1954, Compressed gas, flammable, n.o.s. (Maple Gas Cylinder), 2.1</del> <b>SR</b>					None		
X	7 <del>UN1950, Aerosols, flammable, n.o.s., 2.1 LTD. QTY. (each not exceeding 1 L capacity)</del> <b>SR</b>					None		
X	8 UN1046, Helium, compressed, 2.2 <b>SR</b>					NONE		
X	9 UN1044, Fire extinguishers, 2.2 <b>35977</b>	001	DF	0175	P	None		
X	10 <del>UN1950, Compressed gas, n.o.s. (Polymers MBI), 2.2</del> <b>SR</b>					None		
X	11 <del>UN1955, Compressed gas, n.o.s. (Freon), 2.2</del> <b>SR</b>					NONE		
X	12 <del>UN1872, Oxygen, compressed, 2.2 (5.1)</del> <b>SR</b>					NONE		
X	13 <del>UN1955, Compressed gas, n.o.s., 2.2</del> <b>SR</b>					None		
X	14 UN1993, Flammable liquids, n.o.s., (kerosene, gasoline), 3, PGI1 <b>35978</b>	001	TP	0250	G	None		

GENERATOR

32. Special Handling Instructions and Additional Information

5. HHAERO ERG # 128 <b>3Xyd</b>	8. HHHELIUM ERG # 121	12. HHOXYGEN ERG # 122	<b>Emergency Contact: CHEMTREC (800) 424-9300 CCN836231</b>
6. HHMAPPG ERG # 115	9. HHFX ERG # 128 <b>1X55(50)</b>	13. HHCOMP ERG # 128	
7. HHAEROFM ERG # 128	10. HHFOAM ERG # 128	14. HHBFL ERG # 128 <b>1XTOFE</b>	
	11. HHFREON ERG # 126		

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)

**H050** | | | | **H141**

| | | | **H061** 261

Please print or type.

7965

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number <b>EXEMPT</b>	22. Page <b>3 of 6</b>	23. Manifest Tracking Number <b>02116ldo474JJK</b>		
24. Generator's Name <b>EI - LFUCG 1831 Old Frankfort Pike Lexington, KY 40504</b>						
25. Transporter Company Name <b>Midwest Environmental Transport, Inc.</b>				U.S. EPA ID Number <b>OH0000000539</b>		
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	<del>15 UN1866, Resin solution, flammable, 3, PGI</del> <b>SC</b>					None
X	<del>16 UN1263, Flammable liquids, n.o.s., (kerosene, gasoline), 3, PGI</del> <b>SC</b>					None
X	<del>17 UN1263, Paint, 3, PGI-LTD. QTY. (Aluminum Paint)</del> <b>SC</b>					None
X	<del>18 UN1263, Paint, 3, PGI-LTD. QTY. (Household Paint)</del> <b>SC</b>					None
X	<del>19 RQ, UN3021, Pesticides, liquid, flammable, toxic, n.o.s., (malathion chlordane), 3 (6.1), PGI</del> <b>21-35179-90</b>	013	DM	2600	P	None
X	<del>20 UN1993, Flammable liquids, n.o.s., (paint, paint thinner), 3, PGI</del> <b>35992-09</b>	018	DF	3870	P	None
X	<del>21 UN1325, Flammable solids, organic, n.o.s., (magnesium metal), 4.1 PGI</del> <b>SC</b>					None
X	<del>22 UN1845, Water reactive solid, n.o.s., (Calcium Carbide, Sodium), 4.3, PGI</del> <b>SC</b>					None
X	<del>23 UN1478, Oxidizing solid, n.o.s., (chlorine), 5.1, PGI</del> <b>36010</b>	001	DF	0170	P	None
X	<del>24 UN1478, Oxidizing liquid, n.o.s., (hypochlorite solution), 5.1, PGI</del> <b>SC</b>					None
32. Special Handling Instructions and Additional Information						
15. HHRESINS	ERG # 127	18. HHPNT	ERG # 127	22. HDDWW	ERG # 138	
16. HHBFL	ERG # 128	19. HHPLIQ	ERG # 131	23. HHOXLPS	ERG # 140	
17. HHALUM	ERG # 127	20. HHFLP	ERG # 128	24. HHOXLPL	ERG # 140	
		21. HHESLP	ERG # 133			
					<b>Emergency Contact:</b>	
					<b>CHEMTREC</b>	
					<b>(800) 424-9300</b>	
					<b>CCN836231</b>	
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)						
				H061		
H1061				H070		

GENERATOR

TRANSPORTER

DESIGNATED FACILITY

Please print or type.

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Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	21. Generator ID Number <b>EXEMPT</b>	22. Page <b>4 of 6</b>	23. Manifest Tracking Number <b>021646474JJK</b>
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24. Generator's Name  
**EI - LFUCG  
1631 Old Frankfort Pike  
Lexington, KY 40504**

25. Transporter Company Name  
**Midwest Environmental Transport, Inc.**

U.S. EPA ID Number  
**OH0000000539**

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	<del>25 UN2455, Trichloroisocyanuric acid, dry, (Trichloroisocyanuric Acid), 5.1, PGII</del> <i>SR</i>					None	
X	<del>26 UN3188, Organic peroxide type D, liquid, (methyl ethyl ketone peroxide), 6.2</del> <i>SR</i>					None	
X	27 <del>RD, UN2568, Pesticides, solid, toxic, n.o.s., (daizinin, sevin), 6.1, PGII</del> <i>21-36011-13</i>	003	CF	1800	P	None	
X	<del>28 UN2611, Toxic solids, organic, n.o.s., (trichlorophenol, pentachlorophenol), 6.1, PGII</del> <i>SR</i>					None	
X	<del>29 UN3080, Isocyanates, toxic, flammable, n.o.s., 6.1 (5), PGII</del> <i>SR</i>					None	
X	<del>30 UN3288, Toxic solid, inorganic, n.o.s., (lead, chromium), 6.1, PGII</del> <i>SR</i>					None	
X	<del>31 UN3289, Toxic solid, inorganic, n.o.s., (nickel cadmium battery), 6.1, PGII</del> <i>SR</i>					None	
X	<del>32 UN1580, Cyanides, inorganic, solid, n.o.s., 6.1, PGII</del> <i>SR</i>					None	
X	<del>33 RD, UN2898, Mercury, 6 (6.1), PGIII</del> <i>SR</i>					None	
X	34 UN3266, Corrosive liquid, basic, inorganic, n.o.s., (sodium hydroxide, potassium hydroxide), 8, PGII	001	DM	185	P	None	

32. Special Handling Instructions and Additional Information

25. HHTICN	ERG # 140	28. HHDIQX	ERG # 154	32. HHCYAN	ERG # 157	<b>Emergency Contact:</b> <b>CHEMTREC</b> <b>(800) 424-9300</b> <b>CCN836231</b>
26. HHOPER	ERG # 145	29. HHISO	ERG # 155	33. HHMERC	ERG # 172	
27. HHPSOL	ERG # 151	30. HHTXLP	ERG # 151	34. HHALLP	ERG # 154	
		31. HHNICD	ERG # 151			

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)

**H141**

**H070** 263

GENERATOR

TRANSPORTER

DESIGNATED FACILITY



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<b>UNIFORM HAZARDOUS WASTE MANIFEST</b> (Continuation Sheet)	21. Generator ID Number <b>EXEMPT</b>	22. Page <b>5 of 6</b>	23. Manifest Tracking Number <b>0211666474JJK</b>
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24. Generator's Name <b>EEL - LFUCG</b> <b>1631 Old Frankfort Pike</b> <b>Lexington, KY 40504</b>	
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25. Transporter <u>1</u> Company Name <b>Midwest Environmental Transport, Inc.</b>	U.S. EPA ID Number <b>OH0000000539</b>
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26. Transporter _____ Company Name	U.S. EPA ID Number
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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	<b>35 RQ, UN2794, Batteries, wet, filled with acid, 8, PGIII</b> <i>21-36015</i>	001	CF	1200	P	None	
X	<b>36 RQ, UN3264, Corrosive liquid, acidic, inorganic, n.o.s., (hydrochloric acid, sulfuric acid), 8, PGII</b> <i>36016-7</i>	002	DM	0385	P	None	
X	<b>37 UN3850, Lithium metal batteries including lithium alloy batteries, lithium batteries, 9, PGII</b> <i>SC</i>					None	
X	<b>38 UN3884, Lithium metal batteries contained in equipment including lithium alloy batteries, 9, PGII</b> <i>SC</i>					None	
X	<b>39 NA2242, Asbestos, 9, PGIII</b> <i>SC</i>					None	
	<del>40 Non-regulated (fluorescent lamps)</del> <i>SC</i>					Universal	
	<del>41 Non-regulated (Fire Fighting Foam)</del> <i>SC</i>					None	
	<del>42 Non-regulated (household batteries)</del> <i>SC</i>					None	
	<del>43 Non-regulated (antifreeze)</del> <i>SC</i>					None	
	<del>44 Non-regulated (Non-PCB Light Ballast)</del> <i>SC</i>					None	

32. Special Handling Instructions and Additional Information	38. HHECIG	42. HHBAT	
35. HHPBAC ERG # 154 <i>IXYD</i>	39. HHASB ERG # 171	43. HHANTI	<b>Emergency Contact:</b> <b>CHEMTRAC</b> <b>(800) 424-9300</b> <b>CCN836231</b>
36. HHACLP ERG # 154 <i>2XG</i>	40. HHFLOR	44. HHNBALL	
37. HHLJBT ERG # 139	41. HHAFFF		

33. Transporter _____ Acknowledgment of Receipt of Materials	Signature	Month	Day	Year
Printed/Typed Name				

34. Transporter _____ Acknowledgment of Receipt of Materials	Signature	Month	Day	Year
Printed/Typed Name				

35. Discrepancy
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36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
<i>H141</i> <i>H070</i>

GENERATOR

TRANSPORTER

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Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	21. Generator ID Number <b>EXEMPT</b>	22. Page <b>6 of 6</b>	23. Manifest Tracking Number <b>021666474 JJK</b>
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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  
**OH0000000539**

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					
	<b>45 Non-regulated (household cleaners)</b> <i>21-36018-23006</i>		<b>DF</b>	<b>1200</b>	<b>P</b>	<b>None</b>		
	<del>46 Non-regulated (fluorescent lamps)</del> <i>SR</i>					<b>Universal</b>		
	<del>47 Non-regulated (putty and adhesives)</del> <i>SR</i>					<b>None</b>		
	<del>48 Non-regulated (oil filters)</del> <i>SR</i>					<b>None</b>		
	<b>49 Non-regulated (used oil)</b> <i>36024</i>	<b>001</b>	<b>TP</b>	<b>0200</b>	<b>G</b>	<b>None</b>		
	<del>50 Non-regulated (used oil)</del> <i>SR</i>					<b>None</b>		
	<del>51 Non-regulated (Smoke Detectors)</del> <i>SR</i>					<b>None</b>		
	<b>52</b>							
	<b>53</b>							
	<b>54</b>							

GENERATOR

32. Special Handling Instructions and Additional Information

45. HHCLNR *6X55*      48. HHOFIL  
46. HHFLOR              49. HHOIL *1X TOTE*  
47. HHPUTY              50. HHOIL  
   51. HHSMOK

**Emergency Contact:**  
**CHEMREC**  
**(800) 424-9300**  
**CCN836231**

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 \_\_\_\_\_

TRANSPORTER

35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

**H110**      **H114**

DESIGNATED FACILITY

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Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number <b>EXEMPT</b>	2. Page 1 of <b>6</b>	3. Emergency Response Phone <b>(800) 424-9300</b>	4. Manifest Tracking Number <b>021666473 JJK</b>						
5. Generator's Name and Mailing Address <b>EEL - LFUCG 1631 Old Frankfort Pike Lexington, KY 40504</b>				Generator's Site Address (if different than mailing address) <b>(859) 387-4848</b>							
6. Transporter 1 Company Name <b>Midwest Environmental Transport, Inc.</b>				U.S. EPA ID Number <b>OH0000000539</b>							
7. Transporter 2 Company Name				U.S. EPA ID Number							
8. Designated Facility Name and Site Address <b>Environmental Enterprises, Inc. 4650 Spring Grove Avenue Cincinnati, OH 45232</b>				U.S. EPA ID Number <b>OH D083377010</b>							
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		UN1057, Lighters, 2.1 <i>21-36309</i>		001 DF		0015	P	None			
X		UN1978, Propane, 2.1 <i>36310-11</i>		002 DM		0200	P	None			
X		<del>UN1954, Waste Compressed gas, flammable, n.o.s., 2.1</del> <i>SC</i>						HHW			
X		UN1978, Propane, 2.1 <i>36312</i>		001 CF		0400	P	None			
14. Special Handling Instructions and Additional Information <b>1. HHLTR ERG # 115 1X5</b> <b>2. HHPROP ERG # 115 2x55 (141)</b> <b>3. HHCOMPFL ERG # 115</b> <b>4. HHPROP ERG # 115 1xyd (18)</b>								EEI Work Order # <b>04-153505</b>		Emergency Contact: <b>CHEMTREC (800) 424-9300 or (703) 527-3887 CCN836231</b>	
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 <i>STEVE RUBERG</i>				Signature <i>[Signature]</i>				Month Day Year <i>10 03 11</i>			
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 <i>[Signature]</i>				Signature <i>[Signature]</i>				Month Day Year <i>10 23 11</i>			
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. <i>H141</i>		2. <i>H050</i>			3. <i>H050</i>			4. <i>H050</i>			
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>Claire Doyle</i>				Signature <i>[Signature]</i>				Month Day Year <i>10 27 11</i>			

GENERATOR

TRANSPORTER INTL

DESIGNATED FACILITY



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Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	21. Generator ID Number <b>EXEMPT</b>	22. Page <b>2 of 6</b>	23. Manifest Tracking Number <b>021666473JJK</b>
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24. Generator's Name  
**EEL - LFUCG  
1631 Old Frankfort Pike  
Lexington, KY 40504**

25. Transporter Company Name  
**Midwest Environmental Transport, Inc.**

U.S. EPA ID Number  
**OH0000000539**

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 UN1950, Aerosols, flammable, n.o.s., 2.1 LTD. QTY. (each not exceeding 1 L capacity) <i>21-36313</i>	001	CF	0500	P	None		
X	6 UN1954, Compressed gas, flammable, n.o.s., (Mapp Gas Cylinder), 2.1 <i>36314</i>	001	DF	0005	P	None		
X	7 UN1950, Aerosols, flammable, n.o.s., 2.1 LTD. QTY. (each not exceeding 1 L capacity) <i>36315-17</i>	003	DF	0150	P	None		
X	8 UN1048, Helium, compressed, 2.2 <i>36318</i>	001	CF	0220	P	NONE		
X	9 UN1044, Fire extinguishers, 2.2 <i>36319</i>	001	DM	0600	P	None		
X	10 UN1956, Compressed gas, n.o.s., (Polymeric MDI), 2.2 <i>gc</i>					None		
X	11 UN1956, Compressed gas, n.o.s., (Freon), 2.2 <i>36320</i>	001	DM	0120	P	NONE		
X	12 UN1072, Oxygen, compressed, 2.2 (5.1) <i>gc</i>					NONE		
X	13 UN1956, Compressed gas, n.o.s., (Carbon Dioxide) <i>36321</i>	001	DF	0100	P	None		
X	14 UN1993, Flammable liquids, n.o.s., (kerosene, gasoline), 3, PGII <i>36322</i>	001	TP	0125	G	None		

32. Special Handling Instructions and Additional Information

5. HHAERO ERG # 128 *1X9d* 8. HHHELIUM ERG # 121 *1X9d (11)* 12. HHOXYGEN ERG # 122  
 6. HHMAPPG ERG # 115 *1X5 (3)* 9. HHFX ERG # 128 *1X55 (58)* 13. HHCOMP ERG # 128 *1X20 (8)*  
 7. HHAEROFM ERG # 128 *1X30* 10. HHFOAM ERG # 126 14. HHBFL ERG # 128 *1X70E*

11. HHFREON ERG # 126 *1X95 (72)*

Emergency Contact:  
**CHEMTREC  
(800) 424-9300  
CCN836231**

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)

<i>H050</i>	<i>H050</i>	<i>H141</i>	<i>H141</i>	<i>H141</i>
	<i>H141</i>		<i>H141</i>	<i>H061</i>

GENERATOR

TRANSPORTER

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Form Approved. OMB No. 2050-0039

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<b>UNIFORM HAZARDOUS WASTE MANIFEST</b> (Continuation Sheet)	21. Generator ID Number <b>EXEMPT</b>	22. Page <b>3 of 6</b>	23. Manifest Tracking Number <b>0216666473JJK</b>
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24. Generator's Name <b>EEL - LFUCG 1631 Old Frankfort Pike Lexington, KY 40504</b>	U.S. EPA ID Number <b>OH0000000539</b>
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25. Transporter Company Name <b>Midwest Environmental Transport, Inc.</b>	U.S. EPA ID Number <b>OH0000000539</b>
--	---

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	<b>15 UN1866, Resin solution, flammable, 3, PGII</b> <i>21-36323-24</i>	002	DF	0110	P	None		
X	<b>16 UN1993, Flammable liquids, n.o.s., (kerosene, gasoline), 3, PGII</b> <i>SR</i>					None		
X	<b>17 UN1263, Paint, 3, PGII LTD. QTY. (Aluminum Paint)</b> <i>SR</i>					None		
X	<b>18 UN1263, Paint, 3, PGII LTD. QTY. (Household Paint)</b> <i>36325-46</i>	022	CF	14300	P	None		
X	<b>19 RC, UN3021, Pesticides, liquid, flammable, toxic, n.o.s., (malathion chlordane), 3 (6.1), PGII</b> <i>36347-53</i>	007	DM	01370	P	None		
X	<b>20 UN1993, Flammable liquids, n.o.s., (paint, paint thinner), 3, PGII</b> <i>36354-62</i>	009	DM	1725	P	None		
X	<b>21 UN1325, Flammable solids, organic, n.o.s., (magnesium metal), 4.1 PGII</b> <i>310363</i>	001	DF	0060	P	None		
X	<b>22 UN2843, Water reactive solid, n.o.s., (Calcium Carbide, Sodium), 4.3, PGII</b> <i>SR</i>					None		
X	<b>23 UN1479, Oxidizing solid, n.o.s., (chlorine), 5.1, PGII</b> <i>36364</i>	001	DF	0150	P	None		
X	<b>24 UN3139, Oxidizing liquid, n.o.s., (hypochlorite solution), 5.1, PGII</b> <i>36365-66</i>	002	DF	0370	P	None		

32. Special Handling Instructions and Additional Information	18. HHPNT ERG # 127 <i>2244d</i>	22. HDDWW ERG # 138	<b>Emergency Contact:</b>
15. HHRESINS ERG # 127 <i>130, 130</i>	19. HHPLIQ ERG # 131 <i>7X55</i>	23. HHOXLPS ERG # 140 <i>1X55</i>	<b>CHEMTREC</b>
16. HHBFL ERG # 128	20. HHFLP ERG # 128 <i>9X55</i>	24. HHOXLPL ERG # 140 <i>2X55</i>	<b>(800) 424-9300</b>
17. HHALUM ERG # 127	21. HHFSLP ERG # 133 <i>1X20</i>		<b>CCN838231</b>

33. Transporter Acknowledgment of Receipt of Materials Printed/Typed Name	Signature	Month	Day	Year
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34. Transporter Acknowledgment of Receipt of Materials Printed/Typed Name	Signature	Month	Day	Year
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35. Discrepancy
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36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)				
<i>H141</i>		<i>H110</i>	<i>H061</i>	
<i>H061</i>	<i>H141</i>	<i>H070</i>	<i>H070</i>	268

GENERATOR

TRANSPORTER

DESIGNATED FACILITY

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UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	21. Generator ID Number <b>EXEMPT</b>	22. Page <b>4 of 6</b>	23. Manifest Tracking Number <b>021666473JJK</b>
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24. Generator's Name <b>EEL - LFUCG 1631 Old Frankfort Pike Lexington, KY 40504</b>
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25. Transporter Company Name <b>Midwest Environmental Transport, Inc.</b>	U.S. EPA ID Number <b>OH0000000539</b>
--	---

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	<del>25 UN2460, Trichloroisocyanuric acid, dry, (Trichloroisocyanuric Acid), 5.1, PGII</del> <i>SR</i>						None		
X	26 UN3105, Organic peroxide type D, liquid, (methyl ethyl ketone peroxide), 5.2	<i>21-36367</i>	001 DF	0008 P			None		
X	27 RC, UN2588, Pesticides, solid, toxic, n.o.s., (daiznon, sevin), 6.1, PGII	<i>36368-69</i>	002 CF	1200 P			None		
X	<del>28 UN2811, Toxic solids, organic, n.o.s., (trichlorophenol, pentachlorophenol), 6.1, PGII</del> <i>SR</i>						None		
X	<del>29 UN3086, Isocyanates, toxic, flammable, n.o.s., 6.1 (3), PGII</del> UN3288, Toxic solid, inorganic n.o.s. (lead, chromium), 6.1, PGII <i>36370</i>		001 DF	0008 P			None		
X	30 UN3288, Toxic solid, inorganic, n.o.s., (lead, chromium), 6.1, PGII	<i>36371</i>	001 CF	0100 P			None		
X	31 UN3288, Toxic solid, inorganic, n.o.s., (nickel cadmium battery), 6.1, PGII	<i>36372</i>	001 DM	0120 P			None		
X	<del>32 UN1588, Cyanides, inorganic, solid, n.o.s., 6.1, PGII</del> <i>SR</i>						None		
X	33 RC, UN2809, Mercury, 8 (6.1), PGIII	<i>36373</i>	001 OF	0025 P			None		
X	34 UN3266, Corrosive liquid, basic, inorganic, n.o.s., (sodium hydroxide, potassium hydroxide), 8, PGII	<i>36374-75</i>	002 DM	0370 P			None		

32. Special Handling Instructions and Additional Information	28. HHDIOX ERG # 154	32. HHCYAN ERG # 157	Emergency Contact: <b>CHEMTREC</b> <b>(800) 424-9300</b> <b>CCN836231</b>
25. HHTICN ERG # 140	29. HHSOHXV ERG # 155 <i>1x5</i>	33. HHMERC ERG # 172 <i>1x20</i>	
26. HHOPEL ERG # 145 <i>1x20</i>	30. HHTXLP ERG # 151 <i>1x20</i>	34. HHALLP ERG # 154 <i>2x55</i>	
27. HHPSOL ERG # 151 <i>2x20</i>	31. HHNICD ERG # 151 <i>1x55</i>		

33. Transporter Acknowledgment of Receipt of Materials	Signature	Month	Day	Year
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34. Transporter Acknowledgment of Receipt of Materials	Signature	Month	Day	Year
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35. Discrepancy
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36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)	<i>H141</i>	<i>H141</i>	<i>H141</i>	<i>H141</i>	<i>H070</i> 269
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<b>UNIFORM HAZARDOUS WASTE MANIFEST</b> (Continuation Sheet)	21. Generator ID Number <b>EXEMPT</b>	22. Page <b>5 of 6</b>	23. Manifest Tracking Number <b>021666473JJK</b>
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24. Generator's Name <b>EEL - LFUCG 1631 Old Frankfort Pike Lexington, KY 40504</b>	U.S. EPA ID Number <b>OH0000000539</b>
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25. Transporter Company Name <b>Midwest Environmental Transport, Inc.</b>	U.S. EPA ID Number <b>OH0000000539</b>
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	<b>35 RC, UN2794, Batteries, wet, filled with acid, 8, PGIII</b> <i>21-36376</i>	001	CF	0350	P	None		
X	<b>36 RC, UN3264, Corrosive liquid, acidic, inorganic, n.o.s., (hydrochloric acid, sulfuric acid), 8, PGII</b> <i>36377-78</i>	002	DM	0400	P	None		
X	<b>37 UN3090, Lithium metal batteries including lithium alloy batteries, lithium Batteries, 9, PGII</b> <i>36379</i>	001	DM	0100	P	None		
X	<b>38 UN3091, Lithium metal batteries contained in equipment including lithium alloy batteries, 9, PGII</b> <i>36380</i>	001	DF	0004	P	None		
X	<del>39 NA2212, Asbestos, 9, PGIII</del> <i>yz</i>					None		
	<b>40 Non-regulated (fluorescent lamps)</b> <i>36381</i>	001	DM	0075	P	Universal		
	<del>41 Non-regulated (Fire Fighting Foam)</del> <i>yz</i>					None		
	<b>42 Non-regulated (household batteries)</b> <i>36382-83</i>	002	DM	0350	P	None		
	<b>43 Non-regulated (antifreeze)</b> <i>36384</i>	001	TP	0100	G	None		
	<b>44 Non-regulated (Non-PCB Light Ballast)</b> <i>36385</i>	001	DF	070	P	None		

32. Special Handling Instructions and Additional Information	39. HHECIG <i>1X5</i>	42. HHBAT <i>2X55</i>	<b>Emergency Contact:</b>
35. HHPBAC ERG # 154 <i>1X40</i>	39. HHASB ERG # 171	43. HHANTI <i>1XTOTE</i>	<b>CHEMTREC</b>
36. HHACLP ERG # 154 <i>2X55</i>	40. HHFLOR <i>1X55</i>	44. HHNBALL <i>1X30</i>	<b>(800) 424-9300</b>
37. HHLIBT ERG # 138 <i>1X55</i>	41. HHAFFF		<b>CCN836231</b>

33. Transporter Acknowledgment of Receipt of Materials Printed/Typed Name	Signature	Month	Day	Year
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34. Transporter Acknowledgment of Receipt of Materials Printed/Typed Name	Signature	Month	Day	Year
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35. Discrepancy
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36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
<i>H141</i>   <i>H070</i>   <i>H141</i>   <i>H141</i>
<i>H141</i>     <i>H141</i>   <i>H141</i>   <i>H141</i> 270

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<b>UNIFORM HAZARDOUS WASTE MANIFEST</b> (Continuation Sheet)	21. Generator ID Number <b>EXEMPT</b>	22. Page <b>6 of 6</b>	23. Manifest Tracking Number <b>021664473 JJK</b>
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24. Generator's Name <b>EEL - LFUCG</b> <b>1631 Old Frankfort Pike</b> <b>Lexington, KY 40504</b>	U.S. EPA ID Number <b>OH0000000539</b>
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25. Transporter Company Name <b>Midwest Environmental Transport, Inc.</b>	U.S. EPA ID Number <b>OH0000000539</b>
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26. Transporter Company Name	U.S. EPA ID Number
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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					
	<b>45 Non-regulated (household cleaners)</b> <i>21-36386-91</i>	<i>006</i>	<i>DM</i>	<i>1150</i>	<i>P</i>	<b>None</b>		
	<del><b>46 Non-regulated (fluorescent lamps)</b></del> <i>— 92</i>					<b>Universal</b>		
	<b>47 Non-regulated (putty and adhesives)</b> <i>36392-99</i>	<i>008</i>	<i>CF</i>	<i>4675</i>	<i>P</i>	<b>None</b>		
	<b>48 Non-regulated (oil filters)</b> <i>36400</i>	<i>001</i>	<i>DF</i>	<i>0080</i>	<i>P</i>	<b>None</b>		
	<b>49 Non-regulated (used oil)</b> <i>36401</i>	<i>001</i>	<i>TP</i>	<i>0160</i>	<i>G</i>	<b>None</b>		
	<del><b>50 Non-regulated (used oil)</b></del> <i>— 92</i>					<b>None</b>		
	<b>51 Non-regulated (Smoke Detectors)</b> <i>36402</i>	<i>001</i>	<i>DF</i>	<i>0060</i>	<i>P</i>	<b>None</b>		
	<b>52 Non-regulated (empty drum)</b>	<i>001</i>	<i>DM</i>	<i>0020</i>	<i>P</i>	<b>None</b>		
<b>X</b>	<b>53 UN1993, Flammable Liquids, n.o.s.</b> <b>(kerosene, gasoline), 3, PGII</b> <i>36545</i>	<i>001</i>	<i>DM</i>	<i>354</i>	<i>P</i>	<b>None</b>		
	<b>54</b>							

32. Special Handling Instructions and Additional Information <b>45. HHCLNR 6X55</b> <b>46. HHFLOR</b> <b>47. HHPUTY 8x4d</b>	48. HHOFIL 1X20 49. HHOIL 1X TOTE 50. HHOIL 51. HHSMOK 1X30	52. HHMTDM 1X50 53. HHBFL	<b>Emergency Contact:</b> <b>CHEMTREC</b> <b>(800) 424-9300</b> <b>CCN836231</b>
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33. Transporter Acknowledgment of Receipt of Materials Printed/Typed Name: _____ Signature: _____	Month: _____ Day: _____ Year: _____
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34. Transporter Acknowledgment of Receipt of Materials Printed/Typed Name: _____ Signature: _____	Month: _____ Day: _____ Year: _____
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35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)			
<b>H110</b>	<b>H110</b>	<b>H110</b>	<b>H141</b>
<b>H141</b>	<b>H141</b>	<b>H1061</b>	

GENERATOR

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Form Approved. OMB No. 2050-0039

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>EXEMPT</b>	2. Page 1 of <b>6</b>	3. Emergency Response Phone <b>(800) 424-9300</b>	4. Manifest Tracking Number <b>021666732 JJK</b>				
5. Generator's Name and Mailing Address <b>EEL - LFUCG 1831 Old Frankfort Pike Lexington, KY 40504</b>				Generator's Site Address (if different than mailing address)					
Generator's Phone: <b>(859) 367-4948</b>									
6. Transporter 1 Company Name <b>Midwest Environmental Transport, Inc.</b>				U.S. EPA ID Number <b>OH0000000539</b>					
7. Transporter 2 Company Name				U.S. EPA ID Number					
8. Designated Facility Name and Site Address <b>Environmental Enterprises, Inc. 4650 Spring Grove Avenue Cincinnati, OH 45232</b>				U.S. EPA ID Number <b>OH D083377010</b>					
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		<b>UN1950, Aerosols, flammable, n.o.s., 2.1 LTD. QTY. (each not exceeding 1 L capacity)</b> <b>21-36709-12</b>		<b>004 CF</b>		<b>2000</b>	<b>P</b>	<b>None</b>	
X		<b>UN1978, Propane, 2.1</b> <b>36713-14</b>		<b>002 CF</b>		<b>0750</b>	<b>P</b>	<b>None</b>	
X		<b>UN1057, Lighters, 2.1</b> <b>SC</b>						<b>None</b>	
X		<b>UN1954, Waste Compressed gas, flammable, n.o.s., 2.1</b> <b>SC</b>						<b>HHW</b>	
14. Special Handling Instructions and Additional Information <b>1. HHAERO ERG # 128 4x10</b> <b>2. HHPROP ERG # 115 2x10 (36x10)</b> <b>3. HHLTR ERG # 115</b> <b>4. HHCMPFL ERG # 115</b> <b>EEL Work Order # 04-152543</b> <b>Emergency Contact: CHEMTREC (800) 424-9300 or (703) 527-3887 CCN836231</b>									
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 <b>SHERI RUBERG</b>				Signature 				Month Day Year <b>10 23 21</b>	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Transporter signature (for exports only): _____ Port of entry/exit: _____ Date leaving U.S.: _____									
17. Transporter Acknowledgment of Receipt of Materials									
Transporter 1 Printed/Typed Name 				Signature 				Month Day Year	
Transporter 2 Printed/Typed Name				Signature 				Month Day Year	
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. <b>H050</b>		2. <b>H050</b>		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 <b>Claire Doyle</b>				Signature 				Month Day Year <b>11 07 21</b>	

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UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number <b>EXEMPT</b>	22. Page <b>2 of 6</b>	23. Manifest Tracking Number <b>021666732-JJK</b>						
24. Generator's Name <b>EEL - LFUCG 1631 Old Frankfort Pike Lexington, KY 40504</b>										
25. Transporter Company Name <b>Midwest Environmental Transport, Inc.</b>				U.S. EPA ID Number <b>OH0000000539</b>						
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 <del>UN1950, Aerosols, flammable, n.o.s., 2.1 LTB. QTY. (each not exceeding 1 L capacity)</del> <i>SC</i>					None			
	X	6 <del>UN1954, Compressed gas, flammable, n.o.s., (Map Gas Cylinder)</del> <i>SC</i>					None			
	X	7 UN1978, Propane, 2.1 <i>21-36715-16</i>	002	DM	0150	P	None			
	X	8 UN1956, Compressed gas, n.o.s., (Freon), 2.2 <i>36717</i>	001	DF	0090	P	NONE			
	X	9 <del>UN1045, Helium, compressed, 2.2</del> <i>SC</i>					NONE			
	X	10 UN1044, Fire extinguishers, 2.2 <i>36718</i>	001	DM	0100	P	None			
	X	11 UN1072, Oxygen, compressed, 2.2 (5.1) <i>36719</i>	001	DM	0160	P	NONE			
	X	12 <del>UN1956, Compressed gas, n.o.s., 2.2</del> <i>SC</i>					None			
	X	13 <del>UN1956, Compressed gas, n.o.s., (Polymeric MDI), 2.2</del> <i>SC</i>					None			
	X	14 UN1993, Flammable liquids, n.o.s., (kerosene, gasoline), 3, PGII <i>36720</i>	001	TP	200	G	None			
	32. Special Handling Instructions and Additional Information 5. HHAEROFM ERG # 126 6. HHMAPPG ERG # 115 7. HHPROP ERG # 115 <i>215 (135)</i> 8. HHFREON ERG # 126 <i>155 (3L)</i> 9. HHHELIUM ERG # 121 10. HHFX ERG # 128 <i>1X55 (43)</i> 11. HHOXYGEN ERG # 122 <i>1X55 (7)</i> 12. HHCOMP ERG # 126 13. HHFOAM ERG # 126 14. HHBFL ERG # 128 <i>1XDTG</i>						Emergency Contact: <b>CHEMTREC</b> <b>(800) 424-9300</b> <b>CCN836231</b>			
	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)									
			<b>H050</b>			<b>H141</b>				
<b>H141</b>			<b>H070</b>			<b>H061</b>			273	

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UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number <b>EXEMPT</b>	22. Page <b>3 of 6</b>	23. Manifest Tracking Number <b>021666732JJK</b>		
24. Generator's Name <b>EEL - LFUCG 1631 Old Frankfort Pike Lexington, KY 40504</b>						
25. Transporter Company Name <b>Midwest Environmental Transport, Inc.</b>				U.S. EPA ID Number <b>OH0000000539</b>		
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 UN1263, Paint, 3, PGII LTD. QTY. (Aluminum Paint) <b>21-36721</b>	001	DM	6100	P	None
X	16 UN3021, Pesticides, liquid, flammable, toxic, n.o.s., (malathion, chlordane), 3 (6.1), PGII <b>36722-41</b>	020	DM	3800	P	None
X	17 UN1263, Paint, 3, PGII LTD. QTY. (Household Paint) <b>SR</b>					None
X	18 UN1993, Flammable liquids, n.o.s., (paint, paint thinner), 3, PGII <b>36742-57</b>	010	DF	3200	P	None
X	19 UN1865, Resin solution, flammable, 3, PGII <b>SR</b>					None
X	20 UN1325, Flammable solids, organic, n.o.s., (magnesium metal), 4.1, PGII <b>SR</b>					None
X	21 UN2813, Water-reactive solid, n.o.s., (Calcium Carbide, Sodium), 4.3, PGII <b>SR</b>					None
X	22 UN2468, Trichloroisocyanuric acid, dry, (Trichloroisocyanuric Acid), 5.1, PGII <b>SR</b>					None
X	23 UN3139, Oxidizing liquid, n.o.s., (hypochlorite solution), 5.1, PGII <b>36758-61</b>	004	DM	0725	P	None
X	24 UN1478, Oxidizing solid, n.o.s., (chlorine), 5.1, PGII <b>36762</b>	001	DF	0150	P	None
32. Special Handling Instructions and Additional Information						
15. HHALUM ERG # 127 <b>1X55</b>		18. HHFLP ERG # 128 <b>16X55</b>		22. HHTICN ERG # 140		
16. HHPLQ ERG # 131 <b>20X55</b>		19. HHRESINS ERG # 127		23. HHOXLPL ERG # 140 <b>4X55</b>		
17. HHPNT ERG # 127		20. HHFSLP ERG # 133		24. HHOXLPS ERG # 140 <b>1X55</b>		
		21. HHDWV ERG # 138		Emergency Contact: <b>CHEMTRAC (800) 424-9300 CCN836231</b>		
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)						
<b>H141</b>		<b>H061</b>		<b>H061</b>		
				<b>H070</b>		
				<b>H070</b> <sup>274</sup>		

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UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	21. Generator ID Number <b>EXEMPT</b>	22. Page <b>4 of 6</b>	23. Manifest Tracking Number <b>021666732JJK</b>
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24. Generator's Name  
**EEL - LFUGG  
1631 Old Frankfort Pike  
Lexington, KY 40504**

25. Transporter 1 Company Name  
**Midwest Environmental Transport, Inc.**

U.S. EPA ID Number  
**OH0000000539**

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	<del>25 UN3104, Organic peroxide type B, liquid, (methyl ethyl ketone peroxide); 5.2</del> <b>SR</b>					None		
X	<del>26 UN3088, Isocyanates, toxic, flammable, n.o.s., 6.1 (3), PGII</del> <b>SR</b>					None		
X	<del>27 UN2588, Pesticides, solid, toxic, n.o.s., (dalzinon, sevin); 6.1, PGII</del> <b>21-36763-65</b>	<b>003</b>	<b>CP</b>	<b>1850</b>	<b>P</b>	None		
X	<del>28 UN1588, Cyanides, inorganic, solid, n.o.s., 6.1, PGII</del> <b>SR</b>					None		
X	<del>29 UN3288, Toxic solid, inorganic, n.o.s., (nickel-cadmium battery); 6.1, PGII</del> <b>SR</b>					None		
X	<del>30 UN3288, Toxic solid, inorganic, n.o.s., (lead, chromium); 6.1, PGII</del> <b>SR</b>					None		
X	<del>31 UN2811, Toxic acids, organic, n.o.s., (trichlorophenol, pentachlorophenol); 6.1, PGII</del> <b>SR</b>					None		
X	<del>32 UN2911, Radioactive material, excepted package instruments, (Radium); 7</del> <b>SR</b>					None		
X	<del>33 UN3264, Corrosive liquid, acidic, inorganic, n.o.s., (hydrochloric acid, sulfuric acid); 8, PGII</del> <b>36766-67</b>	<b>002</b>	<b>DM</b>	<b>0385</b>	<b>P</b>	None		
X	<del>34 UN3266, Corrosive liquid, basic, inorganic, n.o.s., (sodium hydroxide, potassium hydroxide); 8, PGII</del> <b>36768-69</b>	<b>002</b>	<b>DM</b>	<b>0370</b>	<b>P</b>	None		

32. Special Handling Instructions and Additional Information

25. HOPER ERG # 145	28. HH CYAN ERG # 157	32. HH EXIT
26. HH ISO ERG # 155	29. HH NICD ERG # 151	33. HH ACLP ERG # 154 <b>2x55</b>
27. HH PSOL ERG # 151 <b>3x55</b>	30. HH TXLP ERG # 151	34. HH ALLP ERG # 154 <b>2x55</b>
	31. HH DIOX ERG # 154	

**Emergency Contact:**  
**CHEMTREC**  
**(800) 424-9300**  
**CCN838231**

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)

**H141**

**H070** | **H070** 275

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<b>UNIFORM HAZARDOUS WASTE MANIFEST</b> (Continuation Sheet)	21. Generator ID Number <b>EXEMPT</b>	22. Page <b>5 of 6</b>	23. Manifest Tracking Number <b>021666732JJK</b>
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24. Generator's Name <b>EEL - LFUCG 1831 Old Frankfort Pike Lexington, KY 40504</b>	U.S. EPA ID Number <b>OH0000000539</b>
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25. Transporter Company Name <b>Midwest Environmental Transport, Inc.</b>	U.S. EPA ID Number <b>OH0000000539</b>
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26. Transporter Company Name	U.S. EPA ID Number
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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	<del>35 UN2800, Mercury, 8 (8.1), PGIII</del> <b>SR</b>					None		
X	<b>36 UN2794, Batteries, wet, filled with acid, 8, PGIII</b> <b>21-36770</b>	<b>001</b>	<b>CF</b>	<b>0600</b>	<b>P</b>	None		
X	<del>37 UN3090, Lithium metal batteries including lithium alloy batteries, Lithium Batteries, 9, PGII</del> <b>SR</b>					None		
X	<del>38 NA2212, Asbestos, 9, PGII</del> <b>SR</b>					None		
X	<del>39 UN3091, Lithium metal batteries contained in equipment including lithium alloy batteries, 9, PGII</del> <b>SR</b>					None		
	<b>40 Non-regulated (fluorescent lamps)</b> <b>36771-77</b>	<b>007</b>	<b>CW</b>	<b>1400</b>	<b>P</b>	Universal		
	<b>41 Non-regulated (fluorescent lamps)</b> <b>36778</b>	<b>001</b>	<b>DM</b>	<b>0110</b>	<b>P</b>	Universal		
	<del>42 Non-regulated (Non-PSB Light Ballast)</del> <b>SR</b>					None		
	<b>43 Non-regulated (household cleaners)</b> <b>36779-86</b>	<b>008</b>	<b>DF</b>	<b>1550</b>	<b>P</b>	None		
	<del>44 Non-regulated (oil filters)</del> <b>SR</b>					None		

32. Special Handling Instructions and Additional Information	38. HHASB ERG # 171	42. HHNBALL	<b>Emergency Contact:</b>
35. HHMERC ERG # 172	39. HHECIG	43. HHCLNR <b>8X55</b>	<b>CHEMTREC</b>
36. HHPBAC ERG # 154 <b>1X5D</b>	40. HHFLOR <b>7X SKID</b>	44. HHOFIL	<b>(800) 424-9300</b>
37. HHLIBT ERG # 138	41. HHFLOR <b>1X55</b>		<b>CCN836231</b>

33. Transporter Acknowledgment of Receipt of Materials	Signature	Month	Day	Year
Printed/Typed Name				

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)

<b>H141</b>	<b>H141</b>	<b>H140</b>	<b>276</b>
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Please print or type.

796E

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number <b>EXEMPT</b>	22. Page <b>6 of 6</b>	23. Manifest Tracking Number <b>021666732JJK</b>		
24. Generator's Name <b>EI - LFUCG 1631 Old Frankfort Pike Lexington, KY 40504</b>						
25. Transporter <b>1</b> Company Name <b>Midwest Environmental Transport, Inc</b>				U.S. EPA ID Number <b>OH0000000539</b>		
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			
	<del>45. Non-regulated (household batteries)</del> <b>SR</b>					None
	46. Non-regulated (used oil) <b>21-36787</b>	001	TP	0250	G	None
	<del>47. Non-regulated (antifreeze)</del> <b>SR</b>					None
	<del>48. Non-regulated (used oil)</del> <b>SR</b>					None
	<del>49. Non-regulated (Fire Fighting Foam)</del> <b>SR</b>					None
	50. Non-regulated (putty and adhesives) <b>36788-92</b>	005	CF	3450	P	None
	<del>51. Non-regulated (Smoke Detectors)</del> <b>SR</b>					None
	52					
	53					
	54					
32. Special Handling Instructions and Additional Information						
45. HHBAT		48. HHOIL		Emergency Contact: <b>CHEMTREC</b> <b>(800) 424-9300</b> <b>CCN836231</b>		
46. HHOIL IXTDTE		49. HHAFFF				
47. HHANTI		50. HHPUTY 5x4d				
		51. HHSMOK				
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)						
<b>H141</b>						
<b>H110</b>						

GENERATOR

TRANSPORTER

DESIGNATED FACILITY

**Household Hazardous Waste Collection Proposal  
Part III: Pricing**

<b>Products</b>	<b>Amount</b>	<b>Unit Cost</b>	<b>Total Cost</b>
Antifreeze	3,400 lbs	\$0.10	\$340.00
Flammable Solvents Liquids	7,200 lbs	\$0.13	\$936.00
Lab Packs for Treatment/Incineration	1,100 lbs.	\$1.00	\$11 00.00
Lab Pack Reactives	500 lbs	\$2.75	\$1375.00
NON-LATEX Paint Related Material (Processable 1 & 5 gallon containers)	120,000 lbs.	\$0.20	\$24,000.00
NON-LATEX Paint Related Material (Non-Processable pints & quarts)	15,000 lbs.	\$0.20	\$3000.00
Mercury	75 lbs.	\$27.00	\$2025.00
Fertilizers & Pesticides	15,000 lbs.	\$1.05	\$15,750.00
Waxes, Joint Compounds, Latex Adhesives	14,000 lbs.	\$0.45	\$6300.00
Consumer Commodity Flammables	10,500 lbs.	\$1.00	\$10,500.00
Aerosol Cans	6,000 lbs.	\$0.85	\$5100.00
Non-Motor Oil Used Oils	8,000 lbs.	\$0.12	\$960.00
Corrosives	3,500 lbs.	\$1.00	\$3500.00
Fluorescent bulbs	4,000 feet	\$0.21	\$840.00
PCB Ballast	8 lbs	\$1.65	\$13.20
Propane cylinders	350 x 1 lb	\$3.00	\$1050.00
Propane cylinders	50 x 20 lb	\$10.00	\$500.00

Total Disposal Cost Based on Bid Quantity \$ 77,289.20

## AMERICAN RESCUE PLAN ACT

### AMENDMENT 1 — CERTIFICATION OF COMPLIANCE FOR EXPENDITURES USING FEDERAL FUNDS, INCLUDING THE AMERICAN RESCUE PLAN ACT

The Lexington-Fayette Urban County Government (“LFUCG”) may use Federal funding to pay for the goods and/or services that are the subject matter of this bid. That Federal funding may include funds received by LFUCG under the American Rescue Plan Act of 2021. Expenditures using Federal funds require evidence of the contractor’s compliance with Federal law. Therefore, by the signature below of an authorized company representative, you certify that the information below is understood, agreed, and correct. 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.

**The bidder (hereafter “bidder,” or “contractor”) agrees and understands that in addition to all conditions stated within the attached bid documents, the following conditions will also apply to any Agreement entered between bidder and LFUCG, if LFUCG uses Federal funds, including but not limited to funding received by LFUCG under the American Rescue Plan Act (“ARPA”), toward payment of goods and/or services referenced in this bid. The bidder also agrees and understands that if there is a conflict between the terms included elsewhere in this Request for Proposal and the terms of this Amendment 1, then the terms of Amendment 1 shall control. The bidder further certifies that it can and will comply with these conditions, if this bid is accepted and an Agreement is executed:**

1. Any Agreement executed as a result of acceptance of this bid may be governed in accordance with 2 CFR Part 200 and all other applicable Federal law and regulations and guidance issued by the U.S. Department of the Treasury.

2. Pursuant to 24 CFR § 85.43, any Agreement executed as a result of acceptance of this bid can be terminated if the contractor fails to comply with any term of the award. This Agreement may be terminated for convenience in accordance with 24 CFR § 85.44 upon written notice by LFUCG. Either party may terminate this Agreement with thirty (30) days written notice to the other party, in which case the Agreement shall terminate on the thirtieth day. In the event of termination, the contractor shall be entitled to that portion of total compensation due under this Agreement as the services rendered bears to the services required. However, if LFUCG suspects a breach of the terms of the Agreement and/or that the contractor is violating the terms of any applicable law governing the use of Federal funds, LFUCG may suspend the contractor’s ability to receive payment by giving thirty (30) days’ advance written notice. Further, either party may terminate this Agreement for cause shown with thirty (30) days written notice, which shall explain the party’s cause for the termination. If the parties do not reach a settlement before the end of the 30 days, then the Agreement shall terminate on the thirtieth day. In the event of a breach, LFUCG reserves the right to pursue any and all applicable legal, equitable, and/or administrative remedies against the contractor.

3. The contractor will not discriminate against any employee or applicant for employment because of race, color, religion, sex, sexual orientation, gender identity, or national origin. The contractor will take affirmative action to ensure that applicants are employed and that employees are treated during employment without regard to their race, color, religion, sex, sexual orientation, gender identity, or national origin. Such action shall include, but not be limited to the following:

- (1) Employment, upgrading, demotion, or transfer; recruitment or recruitment advertising; layoff or termination; rates of pay or other forms of compensation; and selection for training, including



apprenticeship. The contractor agrees to post in conspicuous places, available to employees and applicants for employment, notices to be provided setting forth the provisions of this nondiscrimination clause.

- (2) The contractor will, in all solicitations or advertisements for employees placed by or on behalf of the contractor, state that all qualified applicants will receive consideration for employment without regard to race, color, religion, sex, sexual orientation, gender identity, or national origin.
- (3) The contractor will not discharge or in any other manner discriminate against any employee or applicant for employment because such employee or applicant has inquired about, discussed, or disclosed the compensation of the employee or applicant or another employee or applicant. This provision shall not apply to instances in which an employee who has access to the compensation information of other employees or applicants as a part of such employee's essential job functions discloses the compensation of such other employees or applicants to individuals who do not otherwise have access to such information, unless such disclosure is in response to a formal complaint or charge, in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or is consistent with the contractor's legal duty to furnish information.
- (4) The contractor will send to each labor union or representative of workers with which he has a collective bargaining agreement or other contract or understanding a notice to be provided advising the said labor union or workers' representatives of the contractor's commitments under this section and shall post copies of the notice in conspicuous places available to employees and applicants for employment.
- (5) The contractor will comply with all provisions of Executive Order 11246 of September 24, 1965, and of the rules, regulations, and relevant orders of the Secretary of Labor.
- (6) The contractor will furnish all information and reports required by Executive Order 11246 of September 24, 1965, and by rules, regulations, and orders of the Secretary of Labor, or pursuant thereto, and will permit access to his books, records, and accounts by the administering agency and the Secretary of Labor for purposes of investigation to ascertain compliance with such rules, regulations, and orders.
- (7) In the event of the contractor's noncompliance with the nondiscrimination clauses of this contract or with any of the said rules, regulations, or orders, this contract may be canceled, terminated, or suspended in whole or in part, and the contractor may be declared ineligible for further government contracts or federally assisted construction contracts in accordance with procedures authorized in Executive Order 11246 of September 24, 1965, and such other sanctions may be imposed and remedies invoked as provided in Executive Order 11246 of September 24, 1965, or by rule, regulation, or order of the Secretary of Labor, or as otherwise provided by law.
- (8) The contractor will include the portion of the sentence immediately preceding paragraph (1) and the provisions of paragraphs (1) through (8) in every subcontract or purchase order unless exempted by rules, regulations, or orders of the Secretary of Labor issued pursuant to section 204 of Executive Order 11246 of September 24, 1965, so that such provisions will be binding upon each subcontractor or vendor. The contractor will take such action with respect to any subcontract or purchase order as the administering agency may direct as a means of enforcing such provisions, including sanctions for noncompliance.

Provided, however, that in the event a contractor becomes involved in or is threatened with litigation with a subcontractor or vendor as a result of such direction by the administering agency, the contractor may request the United States to enter into such litigation to protect the interests of the United States.

4. If fulfillment of the contract requires the contractor to employ mechanic's or laborers, the contractor further agrees that it can and will comply with the following:

- (1) *Overtime requirements: No contractor or subcontractor contracting for any part of the contract work which may require or involve the employment of laborers or mechanics shall require or permit any such laborer or mechanic in any workweek in which he or she is employed on such work to work in excess of forty hours in such a workweek unless such laborer or mechanic receives compensation at a rate not less than one and one-half times the basic rate of pay for all hours worked in excess of forty hours in such a workweek.*

- (2) *Violation: liability for unpaid wages; liquidated damages. In the event of any violation of the clause set forth in paragraph (1) of this section, the contractor and any subcontractor responsible therefor shall be liable for the unpaid wages. In addition, such contractor and subcontractor shall be liable to the United States (in the case of work done under contract for the District of Columbia or a territory, to such District or to such territory) for liquidated damages. Such liquidated damages shall be computed with respect to each individual laborer or mechanic, including watchmen and guards, employed in violation of the clause set forth in paragraph (1) of this section, in the sum of \$10 for each calendar day on which such individual was required or permitted to work in excess of the standard workweek of forty hours without payment of the overtime wages required by the clause set forth in paragraph (1) of this section.*
- (3) *Withholding for unpaid wages and liquidated damages. LFUCG shall upon its own action or upon written request of an authorized representative of the Department of Labor withhold or cause to be withheld, from any moneys payable on account of work performed by the contractor or subcontractor under any such contract or any other federal contract with the same prime contractor, or any other federally-assisted contract subject to the Contract Work Hours and Safety Standards Act, which is held by the same prime contractor, such sums as may be determined to be necessary to satisfy any liabilities of such contractor or subcontractor for unpaid wages and liquidated damages as provided in the clause set forth in paragraph (2) of this section.*
- (4) *Subcontracts. The contractor or subcontractor shall insert in any subcontracts the clauses set forth in paragraph (1) through (4) of this section and also a clause requiring the subcontractors to include these clauses in any lower-tier subcontracts. The prime contractor shall be responsible for compliance by any subcontractor or lower-tier subcontractor with the clauses set forth in paragraphs (1) through (4) of this section.*

*5. The contractor shall comply with all applicable standards, orders, or regulations issued pursuant to the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq.*

*6. The contractor shall report each violation to LFUCG and understands and agrees that LFUCG will, in turn, report each violation as required to assure notification to the Treasury Department and the appropriate Environmental Protection Agency Regional Office.*

*7. The contractor shall include these requirements in numerical paragraphs 5 and 6 in each subcontract exceeding \$100,000 financed in whole or in part with Federal funding.*

*8. The contractor shall comply with all applicable standards, orders, or regulations issued pursuant to the Federal Water Pollution Control Act, as amended, 33 U.S.C. § 1251 et seq.*

*9. The contractor shall report each violation to LFUCG and understands and agrees that LFUCG will, in turn, report each violation as required to assure notification to the Treasury Department and the appropriate Environmental Protection Agency Regional Office.*

*10. The contractor shall include these requirements in numerical paragraphs 8 and 9 in each subcontract exceeding \$100,000 financed in whole or in part with Federal funds.*

*11. The contractor shall comply with all applicable standards, orders, or regulations issued pursuant to the Federal Water Pollution Control Act, as amended, 33 U.S.C. § 1251 et seq.*

*12. The contractor shall report each violation to LFUCG and understands and agrees that LFUCG will, in turn, report each violation as required to assure notification to the Treasury Department and the appropriate Environmental Protection Agency regional office.*

*13. The contractor shall include these requirements in numerical paragraphs 11 and 12 in each subcontract exceeding \$100,000 financed in whole or in part with American Rescue Plan Act funds.*

14. The contractor shall include this language in any subcontract it executes to fulfill the terms of this bid: “the sub-grantee, contractor, subcontractor, successor, transferee, and assignee shall comply with Title VI of the Civil Rights Act of 1964, which prohibits recipients of federal financial assistance from excluding from a program or activity, denying benefits of, or otherwise discriminating against a person on the basis of race, color, or national origin (42 U.S.C. § 2000d et seq.), as implemented by the Department of the Treasury’s Title VI regulations, 31 CFR Part 22, which are herein incorporated by reference and made a part of this contract (or agreement). Title VI also includes protection to persons with ‘Limited English Proficiency’ in any program or activity receiving federal financial assistance, 42 U.S.C. § 2000d et seq., as implemented by the Department of the Treasury’s Title VI regulations, 31 CFR Part 22, and herein incorporated by reference and made a part of this contract or agreement.”

15. *Contractors who apply or bid for an award of \$100,000 or more shall file the required certification that it will not and has not used federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of any agency. Each tier certifies to the tier above that it will not and has not used federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of any agency, a member of Congress, officer or employee of Congress, or an employee of a member of Congress in connection with obtaining any federal contract, grant, or any other award covered by 31 U.S.C. § 1352. Each tier shall also disclose any lobbying with non-federal funds that takes place in connection with obtaining any federal award. Such disclosures are forwarded from tier to tier, up to the recipient. The required certification is included here:*

- a. The undersigned certifies, to the best of his or her knowledge and belief, that:
  - (1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
  - (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, “Disclosure Form to Report Lobbying,” in accordance with its instructions.
  - (3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.
- b. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

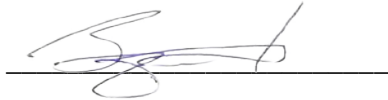
16. The contractor acknowledges and certifies that it has not been debarred or suspended and further acknowledges and agrees that it must comply with regulations regarding debarred or suspended entities in accordance with 24 CFR § 570.489(1). Funds may not be provided to excluded or disqualified persons.

17. The contractor agrees and certifies that to the greatest extent practicable, it will prefer the purchase, acquisition, and use of goods, products or materials produced in the United States, in conformity with 2 C.F.R. § 200.322.



18. The contractor agrees and certifies that all activities performed pursuant to any Agreement entered as a result of the contractor's bid, and all goods and services procured under that Agreement, shall comply with 2 C.F.R. § 200.216 (Prohibition on certain telecommunications and video surveillance services and equipment) and 2 C.F.R. 200 § 200..323 (Procurement of recovered materials), to the extent either section is applicable.

19. If this bid involves construction work for a project totaling \$10 million or more, then the contractor further agrees that all laborers and mechanics, etc., employed in the construction of the public facility project assisted with funds provided under this Agreement, whether employed by contractor, or contractor's contractors, or subcontractors, shall be paid wages complying with the Davis-Bacon Act (40 U.S.C. 3141-3144). Contractor agrees that all of contractor's contractors and subcontractors will pay laborers and mechanics the prevailing wage as determined by the Secretary of Labor and that said laborers and mechanics will be paid not less than once a week. The contractor agrees to comply with the Copeland Anti- Kick Back Act (18 U.S.C. § 874) and its implementing regulations of the U.S. Department of Labor at 29 CFR part 3 and part 5. The contractor further agrees to comply with the applicable provisions of the Contract Work Hours and Safety Standards Act (40 U.S.C. Section 327-333), and the applicable provisions of the Fair Labor Standards Act of 1938, as amended (29 U.S.C. et seq.). Contractor further agrees that it will report all suspected or reported violations of any of the laws identified in this paragraph to LFUCG.

A handwritten signature in blue ink, appearing to be "B. J. ...", is written over a solid horizontal line.

Signature

August 9, 2022

Date

## 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.

X   
\_\_\_\_\_

STATE OF Ohio

COUNTY OF Hamilton

The foregoing instrument was subscribed, sworn to and acknowledged before me

by Brian J. DePeel on this the 9th day

of August, 2022.

My Commission expires: August 7, 2026

  
\_\_\_\_\_  
NOTARY PUBLIC, STATE AT LARGE

  
Cheryl L. Ruberg  
NOTARY PUBLIC  
State of Ohio  
My Commission Expires 8/7/2026

## EQUAL OPPORTUNITY AGREEMENT

### Standard Title VI Assurance

The Lexington Fayette-Urban County Government, (hereinafter referred to as the "Recipient") hereby agrees that as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation, it will comply with Title VI of the Civil Rights Act of 1964, 78Stat.252, 42 U.S.C. 2000d-4 (hereinafter referred to as the "Act"), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, (49 CFR, Part 21) Nondiscrimination in Federally Assisted Program of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the "Regulations") and other pertinent directives, no person in the United States shall, on the grounds of race, color, national origin, sex, age (over 40), religion, sexual orientation, gender identity, veteran status, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient receives Federal financial assistance from the U.S. Department of Transportation, including the Federal Highway Administration, and hereby gives assurance that will promptly take any necessary measures to effectuate this agreement. This assurance is required by subsection 21.7(a) (1) of the Regulations.

### 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.*

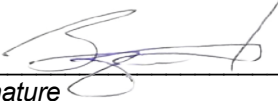
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The Lexington-Fayette Urban County Government practices Equal Opportunity in recruiting, hiring and promoting. It is the Government's intent to affirmatively provide employment opportunities for those individuals who have previously not been allowed 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 Incorporated

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
<b>Administrators</b>	2	2															
<b>Professionals</b>	4	2	1											1			
<b>Superintendents</b>																	
<b>Supervisors</b>	19	13	6														
<b>Foremen</b>																	
<b>Technicians</b>	26	16	2	1		6				1							
<b>Protective</b>																	
<b>Para-</b>	24	17	1			5	1										
<b>Office/Clerical</b>	16	5	9				2										
<b>Skilled Craft</b>	6	6															
<b>Service/Maintena</b>	15	6	5	1	2	1											
<b>Total:</b>	112	67	24	2	2	12	3			1				1			

Prepared by: Barbara Curnutte, HR Director Date: 08 / 08 /2022

*(Name and Title)*

*Revised 2015-Dec-15*

# OSHA's Form 300A (Rev. 01/2004)

## Summary of Work-Related Injuries and Illnesses

Year 2021



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

Form approved OMB no. 1218-0176

All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete.

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 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 restriction	Total number of other recordable cases
<u>0</u>	<u>1</u>	<u>0</u>	<u>0</u>
(G)	(H)	(I)	(J)

### Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
<u>36</u>	<u>0</u>
(K)	(L)

### Injury and Illness Types

Total number of...

(1) Injury	<u>1</u>	(4) Poisoning	<u>0</u>
(2) Skin Disorder	<u>0</u>	(5) Hearing Loss	<u>0</u>
(3) Respiratory Condition	<u>0</u>	(6) All Other Illnesses	<u>0</u>

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 58 minutes per response, including time to review the instruction, 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 currently valid OMB control number. If you have any comments about these estimates or any aspects of this data collection, contact: US Department of Labor, OSHA Office of Statistics, Room N-3644, 200 Constitution Ave. NW, Washington, DC 20210. Do not send the completed forms to this office.

### Establishment information

Your establishment name Environmental Enterprises, Inc. - Processing facility

Street 4650 Spring Grove Avenue

City Cincinnati State Ohio Zip 45232

Industry description (e.g., Manufacture of motor truck trailers)  
Hazardous and non hazardous waste treatment and disposal

Standard Industrial Classification (SIC), if known (e.g., SIC 3715)

OR North American Industrial Classification (NAICS), if known (e.g., 336212)

5 6 2 2 1 1

### Employment information

Annual average number of employees 70

Total hours worked by all employees last year 146,698

### 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

(513) 772-2818  
\_\_\_\_\_  
Phone

\_\_\_\_\_  
President  
1/17/21  
\_\_\_\_\_  
Date



# OSHA's Form 300A (Rev. 01/2004) Summary of Work-Related Injuries and Illnesses

Year 2020



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

Form approved OMB no. 1218-0176

All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete

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 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 restriction	Total number of other recordable cases
<u>0</u>	<u>2</u>	<u>2</u>	<u>0</u>
(G)	(H)	(I)	(J)

## Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
<u>177</u>	<u>20</u>
(K)	(L)

## Injury and Illness Types

Total number of... (M)	(1) Injury	(2) Skin Disorder	(3) Respiratory Condition	(4) Poisoning	(5) Hearing Loss	(6) All Other Illnesses
	<u>4</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

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 58 minutes per response, including time to review the instruction, 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 currently valid OMB control number. If you have any comments about these estimates or any aspects of this data collection, contact: US Department of Labor, OSHA Office of Statistics, Room N-3644, 200 Constitution Ave, NW, Washington, DC 20210. Do not send the completed forms to this office.

## Establishment information

Your establishment name Environmental Enterprises, Inc.  
 Street 10163 Cincinnati-Dayton Rd  
 City Cincinnati State Ohio Zip 45241  
 Industry description (e.g., Manufacture of motor truck trailers)  
Hazardous and non hazardous waste treatment and disposal  
 Standard Industrial Classification (SIC), if known (e.g., SIC 3715)  
 OR North American Industrial Classification (NAICS), if known (e.g., 336212)  
5 6 2 2 1 1

## Employment information

Annual average number of employees 104  
 Total hours worked by all employees last year 214,456

## 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.

[Signature]  
 Company executive  
 (513) 772-2818  
 Phone

President  
 Title  
1/20/21  
 Date





OSHA's Form 300A (Rev. 01/2004)

Summary of Work-Related Injuries and Illnesses

All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete

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 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 restriction	Total number of other recordable cases
0	0	1	0
(G)	(H)	(I)	(J)

**Number of Days**

Total number of days away from work	Total number of days of job transfer or restriction
0	10
(K)	(L)

**Injury and Illness Types**

Total number of... (M)			
(1) Injury	1	(4) Poisoning	0
(2) Skin Disorder	0	(5) Hearing Loss	0
(3) Respiratory Condition	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 58 minutes per response, including time to review the instruction, 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 currently valid OMB control number. If you have any comments about these estimates or any aspects of this data collection, contact: US Department of Labor, OSHA Office of Statistics, Room N-3644, 200 Constitution Ave, NW, Washington, DC 20210. Do not send the completed forms to this office.

**Establishment information**

Your establishment name Environmental Enterprises, Inc.

Street 10163 Cincinnati-Dayton Road

City Cincinnati State Ohio Zip 45241

Industry description (e.g., Manufacture of motor truck trailers)  
Hazardous and Non-Hazardous TSD Facility

Standard Industrial Classification (SIC), if known (e.g., SIC 3715)  
 \_\_\_\_\_

OR North American Industrial Classification (NAICS), if known (e.g., 336212)  
 \_\_\_\_\_

**Employment information**

Annual average number of employees 95

Total hours worked by all employees last year 195,925

**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.

[Signature]  
 \_\_\_\_\_  
 Company executive

[Signature]  
 \_\_\_\_\_  
 Title

1/20/19  
 \_\_\_\_\_  
 Date

(513)772-2818 \_\_\_\_\_  
 Phone

# Summary of Work-Related Injuries and Illnesses

**Note: You can type input into this form and save it.** Because the forms in this recordkeeping package are "fillable/writable" PDF documents, you can type into the input form fields and then save your inputs using the free [Adobe PDF Reader](#).

Year 20 17



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

Form approved OMB no. 1218-0176

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 restriction	Total number of other recordable cases
<u>0</u>	<u>0</u>	<u>0</u>	<u>5</u>
(G)	(H)	(I)	(J)

### Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
<u>0</u>	<u>0</u>
(K)	(L)

### Injury and Illness Types

Total number of . . . (M)	
(1) Injuries	<u>5</u>
(2) Skin disorders	<u>0</u>
(3) Respiratory conditions	<u>0</u>
(4) Poisonings	<u>0</u>
(5) Hearing loss	<u>0</u>
(6) All other illnesses	<u>0</u>

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 currently 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-3644, 200 Constitution Avenue, NW, Washington, DC 20210. Do not send the completed forms to this office.

### Establishment information

Your establishment name Environmental Enterprises, Inc.

Street 10163 Cincinnati Dayton Rd

City Cincinnati State OH Zip 45241

Industry description (e.g., *Manufacture of motor truck trailers*)

Toxic Waste Disposal  
Standard Industrial Classification (SIC), if known (e.g., 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 next page to estimate.)

Annual average number of employees 143

Total hours worked by all employees last year 241083

### 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.

[Signature] President  
Company executive Title

Phone 513-772-2818 Date 1/30/18

**Save Input**

**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](mailto: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, HHW Division

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**



## **TABLE OF CONTENTS**

- I. Purpose of the Affirmative Action Program**
- 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 EEI'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**

EEI is committed to providing performance based employment opportunities to individuals regardless of race, color, religion, sex, or national origin. The Personnel Manager of EEI 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 # 44-2022**

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.  N/A				
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**

August 9, 2022  
**Date**

Brian J. DePeel  
**Company Representative**

Director, HHW Division  
**Title**



**LFUCG MWDBE SUBSTITUTION FORM**  
**Bid/RFP/Quote Reference # 44-2022**

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.  N/A					
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.

Environmental Enterprises, Inc.  
 Company

August 9, 2022  
 Date

Brian J. DePeel  
 Company Representative

Director, HHW Division  
 Title



**MWDBE QUOTE SUMMARY FORM**

Bid/RFP/Quote Reference # 44-2022

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 Communication (email, phone meeting, ad, event etc)	Total dollars \$\$ Do Not Leave Blank (Attach Documentation)	MBE * AA HA AS NA Female	Veteran
N/A								

(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.

Environmental Enterprises, Inc.  
Company

Brian J. DePeel  
Company Representative

August 9, 2022  
Date

Director, HHW Division  
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 #** 44-2022

**Total Contract Amount Awarded to Prime Contractor for this Project** \_\_\_\_\_

<b>Project Name/ Contract #</b>	<b>Work Period/ From:</b> _____ <b>To:</b> _____
<b>Company Name:</b>	<b>Address:</b>
<b>Federal Tax ID:</b>	<b>Contact Person:</b>

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
N/A							

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.

Environmental Enterprises, Inc.  
Company

Brian J. DePeel  
Company Representative

August 9, 2022  
Date

Director, HHW Division  
Title

## LFUCG STATEMENT OF GOOD FAITH EFFORTS

Bid/RFP/Quote # 44-2022

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**  
August 9, 2022  
**Date**

Brian J. DePeel  
**Company Representative**  
Director, HHW 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](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 MWD BE 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 our work, including events such as one day HHW Collections, RFP number 44-2022 known as "Hazardous Household Waste Collection Event", 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 and IonWave Q&A, 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.

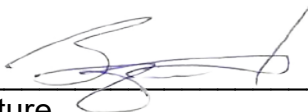
#### B. At Will Termination

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.
20. Contractor [or Vendor or Vendor's Employees] will not appropriate or make use of the Lexington-Fayette Urban County Government (LFUCG) name or any of its trade or service marks or property (including but not limited to any logo or seal), in any promotion, endorsement, advertisement, testimonial or similar use without the prior written consent of the government. If such consent is granted LFUCG reserves the unilateral right, in its sole discretion, to immediately terminate and revoke such use for any reason whatsoever. Contractor agrees that it shall cease and desist from any unauthorized use immediately upon being notified by LFUCG.

  
\_\_\_\_\_  
Signature

August 9, 2022  
\_\_\_\_\_  
Date