

ORIGINAL

Household Hazardous Waste Collection Events

PREPARED FOR:

**Director, Division of Procurement
Lexington-Fayette Urban County Government
200 East Main Street, 3rd Floor
Lexington, KY 40507**

DATE DUE: July 31, 2025

TIME DUE: 2:00 p.m.

RFP #21-2025



Environmental Enterprises, Inc.

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

ENVIRONMENTAL ENTERPRISES INCORPORATED

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



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

July 18, 2025

Lexington-Fayette Urban County Government
200 East Main Street
Lexington, KY 40507
Attention: 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 a designated Saturday in the spring and fall seasons, 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 nation's most diverse environmental services companies 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 49 years of experience. No one who has entrusted EEI with the management of their waste materials has ever incurred any superfund liabilities with respect to the disposition of their materials managed by EEI. Additionally, our insurance carrier has never had a claim on our environmental impairment insurance.

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

Sincerely,
Environmental Enterprises, Inc.

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



Part I – Vendor Qualifications

Qualifications

References

Insurance, License & Permits

Violations

Letters of Recommendation

Key Personnel

Part II – Site Set-Up

Site Diagrams – Overflow Handling -
On-Site Cost Tracking Method -
Equipment List - Off-Site Facilities List
- Operations Plan - Unknown Testing -
Lithium Battery Packaging/Shipping
Guidelines - Emergency/Spill
Contingency Plan - Health & Safety
Plan - Volunteer Training

Part III – HHW Collection Price Sheet

Pricing Sheets

Required Bid Forms

Affirmative Action Form

Workforce Analysis Form

Affidavit

Equal Opportunity Agreement

Minority Business Form

Attachment A – Small Business

General Provisions

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.

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. Orange arrows indicate traffic flow through the site).

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.

EVENT AREA 605 x 630 feet



QUALIFICATIONS & EXPERIENCE

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

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

Philadelphia, PA

Cincinnati, OH

Atkins, VA

Columbus, OH

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

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

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

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

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

Remediation Groups:

Field Services. Over the forty 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-nine 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 seventeen 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 #21-2025 Household Hazardous Waste Collection Events
Lexington-Fayette Urban County Government***

Delaware
Florida
Georgia
Illinois
Indiana
Iowa

Michigan
Minnesota
Mississippi
Missouri
Montana
Nebraska

Ohio
Oklahoma
Pennsylvania
South Carolina
South Dakota
Tennessee

Wisconsin
West Virginia
Wyoming



REFERENCES

Lexington Fayette Urban County Government (LFUCG)

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

EEL was awarded the HHW Collection for **Lexington Fayette Urban County Government (LFUCG)** for 2016, 2017 and 2018 Spring and Fall collections, then again for the 2019 and 2022 contracts which ended in Spring of 2025.

The initial collection with EEL was held on April 23, 2016, and had 1,561 residents participating. 151,405 pounds of material was collected at that time and the final collection of the 2022 contract had 1,302 residents participate and 141,49 pounds of material was transported back to EEL's facility in Cincinnati, Ohio.

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

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

Northern Kentucky Solid Waste Management Area (NKSWMMA)

Megan Clere Abrams
Solid Waste Management Coordinator
Campbell County Fiscal Court
859 547-1866
mclere@campbellcountky.gov

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

2015 was a record-breaking year for NKSWMMA when 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, EEL utilized 4 traffic lanes to keep the cars moving during all 6 hours of this collection. EEL provided 23 staff personnel for this collection and had minimal resident waiting times remaining consistently below the 20-minute offer in each bid - which is a cornerstone example of EEL's unmatched experience, knowledge and dedication to detail on each and every event.



Final collection totals for 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 dropped to 169,977 pounds collected by EEI. 2019, 2020, 2021, 2022 & 2023 all remained consistent at an average of 2,200 residents. However, in 2024 there was a decrease to 1,965 residents and 79,370 pounds were collected.

Vanderburgh County/Evansville, IN

Ms. Jean Carlson
Vanderburgh County SWMD,
One N.W. Martin Luther King Jr., Blvd.
Evansville, IN 47708
(812) 436-7800
jecarlson@evansville.in.gov

EEI has performed a HHW Collection for Joe Ballard of The Vanderburgh County Solid Waste Management District for 20 of the past 23 years with another collection already scheduled for September of 2025.

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. This county also moved to another location and now provides bi-annual collections to their residents. In Fall of 2024, 763 Residents participated and 64,268 pounds of material was collected.

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

GLOW Solid Waste Management Committee

Genesee County
Livingston County
Wyoming County

Caroline Berkemeier
Genesee County Bldg. 2
3837 West Main Street Road
Batavia, NY 14020
(585) 344-2580 Ext. 5463
caroline.berkemeier2@geneseeny.gov

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.



EEL 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 EEL's self-imposed limit of 20 minutes. Eighteen (18) EEL 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 EEL 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 EEL collection and transporting 29,940 pounds of material back to their facility in Cincinnati, Ohio.

They are scheduled for another collection in August, 2025.

Solid Waste Authority of Central Ohio (SWACO)

Mr. Andrew Booker
4239 London Groveport Road
Grove City, Ohio 43123
(614) 782-9405
614 296-1198
andrew.booker@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 2021 SWACO extended EEL's contract through 2025. EEL had established 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 eighteen 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. EEL operates this site with only five full-time personnel

Lake County Solid Waste District

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

EEL just completed our 7th contract year with Lake County for two collections per year in the spring and in the fall. Although we have done events with them since 2008, we have only just started doing events twice a year since 2018. 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. In 2025, EEI assisted Lake County in Opening a Permanent Recycling Center for Universal Wastes throughout Lake County providing training, packaging materials and disposal.

Pennsylvania Resources Council

Josh Schuneman
Pennsylvania Resources Council (PRC)
Collection Events Manager
64 South 14th Street
Pittsburgh, Pa. 15203
(412) 431-4449 ext. 213
Joshs@PRC.org

Josh Schuneman oversees all operational activities for the six (6) PRC collections since 2019 while observing Environmental Enterprises, Inc. (EEI) site protocols, safety and operational activities.

EEI has performed six (6) collections for the Task Force – now called PRC and the following counties in since 2006.

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

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

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

Cambria County: Performed typically in the spring since 2006 at Compliance Technology in Johnstown, Pa. – which is a neighboring city to Pittsburgh. EEI serviced 347 Cambria County residents in 2016 collecting 34,034 pounds of material while again providing a zero wait-time to the residents to be unloaded. 2025 saw a location change to Central Cambria HS which is more centrally located within the county for better access for all county residents.

Washington County: This county joined PRC 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. Starting in 2025 this collection was moved to a nearby shopping mall for easier access.



Beaver County: EEI provides its final collection event of the year for PRC 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 now averages ~600 residents who average delivering 45,249 pounds of acceptable waste to EEI.

NOTE: EEI recycles 90% of all materials collected.



	Bureau of Workers' Compensation	30 W. Spring St. Columbus, OH 43215
Certificate of Ohio Workers' Compensation		
This certifies that the employer listed below participates in the Ohio State Insurance Fund as required by law. Therefore, the employer is entitled to the rights and benefits of the fund for the period specified. This certificate is only valid if premiums and assessments, including installments, are paid by the applicable due date. To verify coverage, visit www.bwc.ohio.gov , or call 1-800-644-6292.		
This certificate must be conspicuously posted.		
Policy number and employer 00666981		Period Specified Below 07/01/2025 to 07/01/2026
ENVIRONMENTAL ENTERPRISES INC 10163 CINCINNATI DAYTON RD CINCINNATI OH 45241		
www.bwc.ohio.gov Issued by: BWC		<i>Stephanie McCloud</i> 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.	
	Bureau of Workers' Compensation
You must post this language with the Certificate of Ohio Workers' Compensation.	

DP-29 BWC-1629 (Rev. Jan. 10, 2019)



	Bureau of Workers' Compensation	30 W. Spring St. Columbus, OH 43215
Certificate of Ohio Workers' Compensation		
This certifies that the employer listed below participates in the Ohio State Insurance Fund as required by law. Therefore, the employer is entitled to the rights and benefits of the fund for the period specified. This certificate is only valid if premiums and assessments, including installments, are paid by the applicable due date. To verify coverage, visit www.bwc.ohio.gov , or call 1-800-644-6292.		
This certificate must be conspicuously posted.		
Policy number and employer 00943437		Period Specified Below 07/01/2025 to 07/01/2026
MIDWEST ENVIRONMENTAL TRANSPORT INC 10163 CINCINNATI DAYTON RD CINCINNATI OH 45241-1586		
www.bwc.ohio.gov Issued by: BWC		<i>Stephanie McCloud</i> 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.	
	Bureau of Workers' Compensation
You must post this language with the Certificate of Ohio Workers' Compensation.	

DP-29 BWC-1629 (Rev. Jan. 10, 2019)



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. *FV-12 9/3/20*

This federal permit is effective on ~~September 4, 2020~~² 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.

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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.

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
23:11:38 -05'00'

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 *Final 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.



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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.



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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:

This permit is effective as of September 2, 2020 ² *ERR 9/3/20* 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
23:15:30 -05'00'

By: _____

Date: _____

Edward Nam
Director
Land, Chemicals and Redevelopment Division



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SECTION I—STANDARD PERMIT CONDITIONS

I.A 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.

I.B PERMIT ACTIONS

I.B.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)).



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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.



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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)).



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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)).



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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



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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(l)(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(l)(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(l)(3), and 270.40(a)).

I.E.14 Twenty-Four Hour Reporting

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

I.E.14.b The report must include the following: (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:



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- (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(l)(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;



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- (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(l)(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(l)(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)).



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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



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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.



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**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.



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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



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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.



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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:



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(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).



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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 m³ (26.4 gallons) and less than or equal to 0.46 m³ (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).



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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 (m³) 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 m³ (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:



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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



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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.



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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.



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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)).



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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).



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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
<p>This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.</p>	
EPA I.D. NUMBER	GH0083377010 REACKNOWLEDGEMENT
INSTALLATION ADDRESS	ENVIRONMENTAL ENTERPRISES INCORPORATED 10147 SPRINGFIELD PIKE CINCINNATI OH 45215
	4650 SPRING GROVE AVE CINCINNATI OH 45232

EPA Form 8700-12A (4-90)



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., 4th Floor
Columbus, Ohio 43215

Central Office • 50 W. Town St. • Suite 700 • P.O. Box 1049 • Columbus, OH 43216-1049
www.epa.ohio.gov • (614) 644-3020 • (614) 644-3184(fax)



Environmental Enterprises, Inc.
Page 2

The record related to this action can be retrieved from the Agency's eDocument Search web site: <http://edocpub.epa.ohio.gov/publicportal/edochohome.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	U202	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	

October 2024 Updated
August 2015 Updated



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.

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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,

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

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

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



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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.



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“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.



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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.



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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.



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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.



**Page 14 of 17
OHD 083 377 010**

**Final Approval
June 2018**

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">PCB Articles (transformers, capacitors, ballasts, and other PCB equipment)PCB oil, PCB debris, and PCB contaminated soils, paint solvents contained in 55-gallon, 85-gallon, 110-gallon drums, pails, and/or totes	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 taping, 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

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

Repository Information

Name:	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	EEI
3. Confirmation of Notice of Intent	March 20, 2012	EPA
4. Final PCB Storage Application	September 6, 2013	EEI
5. EJ Information	May 2017	EPA
6. NOD for the Application	May 25, 2017	EPA
7. Updated Application	June 22, 2017	EEI
8. Public Notice	March 2018	EPA
9. Draft TSCA Approval	March 2018	EPA
10. Final TSCA Approval	June 2018	EPA

EJ: Environmental Justice
EEI: Environmental Enterprises Inc.
EPA: United States Environmental Protection Agency
NOD: Notice of Deficiencies
PCB: Polychlorinated Biphenyls
TSCA: Toxic Substances Control Act



State of Ohio Environmental Protection Agency

Southwest District

661 East Fifth Street
Cincinnati, Ohio 45202-2911

TEL: 513/265-4227 FAX: 513/265-4229
WWW.OHIOEPA.ORG

Tim S. Johnson, Governor
Luz Frutos, Lexington Mayor
Chris Koherski, 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 3745-266-7D. All wastes or materials treated in this unit will contain a recoverable amount of metal for reclamation.

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Ohio EPA is an Equal Opportunity Employer

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Mr. Daniel McCabe
February 11, 2008
Page 2

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas A. Winston'.

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/rlf



<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:	OH0183377010
Ohio ID Number:	05-31-0466
Date modification received by DHWM-CO (Day 0):	01-22-08
Description of change: Description and information for metals reclamation operation	
DO Reviewer: Tom Koch	
CO Co-Reviewer (if applicable):	
Modification Classification (check one):	Classification Method (check one):
<input type="checkbox"/> Class 1 self implementing	<input checked="" type="checkbox"/> Classification determined by Director
<input checked="" type="checkbox"/> Class 1A with Directors prior approval	<input checked="" type="checkbox"/> Listed in Appendix to OAC Rule 3745-50-51
<input type="checkbox"/> Class 2	Appendix Listing
<input type="checkbox"/> Class 3A	<input type="checkbox"/> Not listed in Appendix, submitted as Class 3 by facility
<input type="checkbox"/> Class 3B requiring siting criteria review	
For Class 2 Modifications	
Notice of later construction date: <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable	
If Yes, date of notice to the facility:	
Date facility may begin construction:	
For Class 3B Modification	
<input type="checkbox"/> Yes <input type="checkbox"/> No	Does the modification request meet the siting criteria requirements?*
	*Note that siting criteria reviews for Class 3B Modification requests are conducted jointly between the DO and Co-EU
<input type="checkbox"/> Yes <input type="checkbox"/> No	Does the modification request meet the applicable rule requirements?*
	**See Administrative Checklists available on Haznet
Proposed action on this modification: <input type="checkbox"/> Approval <input type="checkbox"/> Denial (For signatory use the Directors Sign-off Sheet.)	
Comments:	
C:\env\BA 12208_1.doc	



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, 2025.

ENVIRONMENTAL ENTERPRISES, INC.

**4650 SPRING GROVE AVENUE
CINCINNATI, OH 45232**

License Number: 010888700

Wholesaler - Category 3

Expiration Date: June 30, 2025

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)	Signature of Responsible Person
Daniel J McCabe	

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.

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



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.ohio.gov**

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

2025 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 1301:7-7-56(A)(2) 5601.2

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

Expiration Date: 07/01/2025



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**



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

50 West Town Street - Suite 700 * P.O. Box 1049 * Columbus, OH 43216-1049
www.epa.ohio.gov - (614) 644-3020 - (614) 644-3184 (fax)



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

How to give us feedback on your permitting experience

Please complete a survey at 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 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,

A handwritten signature in black ink that reads "Michael E. Hopkins".

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

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



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

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:

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



Final Permit-to-Install and Operate
ENVIRONMENTAL ENTERPRISES
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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



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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.



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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.



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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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B. Facility-Wide Terms and Conditions



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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



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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.



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- 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



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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



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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.



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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.



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- 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%:

[pounds processed per day x 0.50 x 0.001 pound OC/pound processed]/ hours/day = pounds OC/hr

[pounds processed per year x 0.50 x 0.001 pound OC/pound processed]/ 2000 pound/ton = TPY of OC.



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- g) Miscellaneous Requirements
 - (1) None.



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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).



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- (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:



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- 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;



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- 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:

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



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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.



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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).



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- (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;



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- 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;



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- 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:



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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.



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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.



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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



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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



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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.



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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.



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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



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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.



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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.



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	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.



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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



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Effective Date: 10/21/2019

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.



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

- 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 9009
EQUIPMENT DESCRIPTION LAB HOOD #1 - FLASH POINT ANALYSIS
COMPANY ID LAB HOOD #1
ISSUE DATE 06/11/93
EFFECTIVE DATE 06/11/93

(SEE ENCLOSED LETTER FOR EXPLANATION)

Donald R. Schryver

DIRECTOR



NOTICE OF REGISTRATION

40

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

RECEIVED - DYES AIR
POLLUTION CONTROL

JUN 7 1993

FOR:

APPLICATION NO	1431072090 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. Schuynders

DIRECTOR



NOTICE OF REGISTRATION

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

OHIO 45232

RECEIVED - DWD AIR
POLLUTION CONTROL

7 1993

FOR:

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

(SEE ENCLOSED LETTER FOR EXPLANATION)

Donald R. Schryver

DIRECTOR



NOTICE OF REGISTRATION

40

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

RECEIVED
AUG 7 1995

Hamilton County Department
of Environmental Services

FOR:

APPLICATION NO 143107269D 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

60

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/RBTOCLONE
COMPANY ID SOLIDIFICATION MIXER
ISSUE DATE 09/16/93
EFFECTIVE DATE 09/16/93

(SEE ENCLOSED LETTER FOR EXPLANATION)

Donald R. Schryver

DIRECTOR



NOTICE OF REGISTRATION

40

TO:
ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE AVENUE
CINCINNATI OHIO 45239

RECEIVED - SWD AIR
POLLUTION CONTROL

FEB 7 1986

FOR:
APPLICATION NO 14310/2690 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

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

6/15/2017

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,

Craig W. Butler
Director

cc: Osika, Mary
File

50 West Town Street • Suite 700 • P.O. Box 1049 • Columbus, OH 43216-1049
epa.ohio.gov • (614) 644-3020 • (614) 644-3184 (fax)



Mike DeWine, Governor
Jon Husted, Lt. Governor
Anne M. Vogel, Director

March 28, 2023

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

Re: Approval Under Ohio EPA National Pollutant Discharge Elimination System (NPDES) – Industrial Stormwater General Permit – OHR000007

Dear Applicant,

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

Facility Name:	Environmental Enterprises Inc
Facility Location:	4650 Spring Grove Ave
City:	Cincinnati
County:	Hamilton
Ohio EPA Facility Permit Number:	1GR01518*BG
Permit Effective Date:	April 1, 2023
Permit Expiration Date:	May 31, 2027

Please read and review the permit carefully. The permit contains requirements and prohibitions with which you must comply. A copy of the general permit may be viewed or downloaded from [here](#). Coverage under this permit will remain in effect until a renewal of the permit is issued by the Ohio EPA.

If you need assistance or have questions, please call (614) 644-2001 and ask for Industrial Stormwater General Permit support or visit our website at epa.ohio.gov.

Sincerely,

Anne M. Vogel
Director



**RFP #21-2025 Household Hazardous Waste Collection Events
Lexington-Fayette Urban County Government**

Outfall: 001 111 - OHR000007 - Benchmark - Hazardous Waste TSDFs

Parameter	Sampling		Monitoring Months	Concentration Limits			
	Type	Frequency		Max	Min	Wkly	Mthly
00610 - Nitrogen, Ammonia (NH3) - mg/l	Grab	When Disch.	All	3.1			
00900 - Hardness, Total (CaCO3) - mg/l	Grab	When Disch.	All				
00720 - Cyanide, Total - mg/l	Grab	When Disch.	All	0.022			
01051 - Lead, Total (Pb) - ug/l	Grab	When Disch.	All	715			
00335 - Chemical Oxygen Demand (Low Level) - mg/l	Grab	When Disch.	All	120			
01027 - Cadmium, Total (Cd) - ug/l	Grab	When Disch.	All	21.6			
01077 - Silver, Total (Ag) - ug/l	Grab	When Disch.	All	17.3			
00927 - Magnesium, Total (Mg) - mg/l	Grab	When Disch.	All	0.064			
01002 - Arsenic, Total (As) - ug/l	Grab	When Disch.	All	340			
01147 - Selenium, Total (Se) - ug/l	Grab	When Disch.	All	5			
50092 - Mercury, Total (Low Level) - ng/l	Grab	When Disch.	All	1700			



**RFP #21-2025 Household Hazardous Waste Collection Events
Lexington-Fayette Urban County Government**

Outfall: 002 111 - OHR000007 - Benchmark - Hazardous Waste TSDFs

Parameter	Sampling		Monitoring Months	Concentration Limits			
	Type	Frequency		Max	Min	Wkly	Mthly
00610 - Nitrogen, Ammonia (NH3) - mg/l	Grab	When Disch.	All	3.1			
00900 - Hardness, Total (CaCO3) - mg/l	Grab	When Disch.	All				
00720 - Cyanide, Total - mg/l	Grab	When Disch.	All	0.022			
01051 - Lead, Total (Pb) - ug/l	Grab	When Disch.	All	715			
00335 - Chemical Oxygen Demand (Low Level) - mg/l	Grab	When Disch.	All	120			
01027 - Cadmium, Total (Cd) - ug/l	Grab	When Disch.	All	21.6			
01077 - Silver, Total (Ag) - ug/l	Grab	When Disch.	All	17.3			
00927 - Magnesium, Total (Mg) - mg/l	Grab	When Disch.	All	0.064			
01002 - Arsenic, Total (As) - ug/l	Grab	When Disch.	All	340			
01147 - Selenium, Total (Se) - ug/l	Grab	When Disch.	All	5			
50092 - Mercury, Total (Low Level) - ng/l	Grab	When Disch.	All	1700			



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.

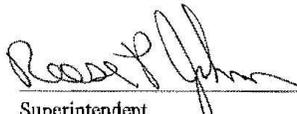
In case the permit makes reference to, or includes in its terms, a plan for pretreating wastewater before its discharge into the Wastewater Treatment System, the issuance of the permit shall not constitute expressed or implied agreement or guarantee that the pretreatment facility constructed in accordance 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.

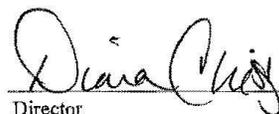
Failure on the part of the Permittee to fulfill any of the specified conditions shall be sufficient cause for immediate revocation of this permit. This permit is further subject to termination upon thirty (30) days written notice to the Permittee by an authorized representative of MSD.

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



**RFP #21-2025 Household Hazardous Waste Collection Events
Lexington-Fayette Urban County Government**

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.	MSD Permit Number:	SIU-42
Address:	4650 Spring Grove Avenue Cincinnati OH 45232	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: Brahim Camara
Or by email to: Brahim.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, 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.



**RFP #21-2025 Household Hazardous Waste Collection Events
Lexington-Fayette Urban County Government**

IUN 42 [Monitoring-SMR]

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

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

Date of Collection	PARAMETER	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: _____



IUN 42 [Monitoring-SMR]

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

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

Date of Collection	PARAMETER	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.

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



**RFP #21-2025 Household Hazardous Waste Collection Events
Lexington-Fayette Urban County Government**

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 Last Review Date: 10/21/20 Last Review By: Luecke	Status: Approved Comments:	Approval Date: 1/24/2020
Certification - PCBs and Past. Received: 1/21/2020 Last Review Date: 10/21/20 Last Review By: Luecke	Status: Approved Comments:	Approval Date: 1/24/2020
Certification - Radiation Received: 1/21/2020 Last Review Date: 10/21/20 Last Review By: Luecke	Status: Approved Comments:	Approval Date: 1/24/2020
Certification - Zero Discharge Received: Last Review Date: 10/21/20 Last Review By: Luecke	Status: Approved Comments: Certification on PCR that no process waste water discharged in previous semi-annual period	Approval Date: 10/23/2020

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.



**RFP #21-2025 Household Hazardous Waste Collection Events
Lexington-Fayette Urban County Government**

Permit Fact Sheet

		FED	LOCAL	Most Stringent
Mercury	Daily Maximum	0.002	0.020	0.002
	Monthly Average	0.001	-	0.001
Nickel	Daily Maximum	3.950	10.000	3.950
	Monthly Average	1.450	-	1.450
Silver	Daily Maximum	0.120	-	0.120
	Monthly Average	0.035	-	0.035
Tin	Daily Maximum	0.409	-	0.409
	Monthly Average	0.120	-	0.120
Titanium	Daily Maximum	0.095	-	0.095
	Monthly Average	0.062	-	0.062
Vanadium	Daily Maximum	0.218	-	0.218
	Monthly Average	0.066	-	0.066
Zinc	Daily Maximum	2.870	10.000	2.870
	Monthly Average	0.641	-	0.641
Cyanide (Total)	Daily Maximum	-	15.000	15.000
Cyanide (Free)	Daily Maximum	-	3.000	3.000
Carbazole	Daily Maximum	0.392	-	0.392
	Monthly Average	0.233	-	0.233
n-Decane	Daily Maximum	5.790	-	5.790
	Monthly Average	3.310	-	3.310
2,4,6-Trichlorophenol	Daily Maximum	0.155	-	0.155
	Monthly Average	0.106	-	0.106
Bis(2-ethylhexyl)phthalate	Daily Maximum	0.267	-	0.267
	Monthly Average	0.158	-	0.158
Fluoranthene	Daily Maximum	0.787	-	0.787
	Monthly Average	0.393	-	0.393
n-Octadecane	Daily Maximum	1.220	-	1.220
	Monthly Average	0.925	-	0.925
o-Cresol	Daily Maximum	1.920	-	1.920
	Monthly Average	0.561	-	0.561
p-Cresol	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) 541-7823
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

Page 43 of 98



OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit to Install

Application No. 05-2585

Applicant's Name: Environmental Enterprises

Permit Fee \$50.00

Address: 4650 Spring Grove Avenue

City: Cincinnati

State: Ohio 45232

Person to Contact: Gary Davis

Telephone: (513) 541-1823

Description of Proposed Source: Pretreatment - Sludge Filter Press

Issuance Date: January 28, 1988

Effective Date: January 28, 1988

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

Ohio Environmental Protection Agency

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

Page 44 of 98



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.


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.

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: **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.

R. 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 Plan

To Whom It May Concern:

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

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

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

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

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

Sincerely,

Environmental Enterprises, Inc.



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



HAZARDOUS MATERIALS
CERTIFICATE OF REGISTRATION
FOR REGISTRATION YEAR(S) 2025-2026

Registrant: ENVIRONMENTAL ENTERPRISES INC
ATTN: Daniel J McCabe
4650 SPRING GROVE AVE
Cincinnati, OH 45232

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

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

Reg. No: 062425550249H Effective: July 1, 2025 Expires: June 30, 2026

HM Company ID: 17873

Record Keeping Requirements for the Registration Program

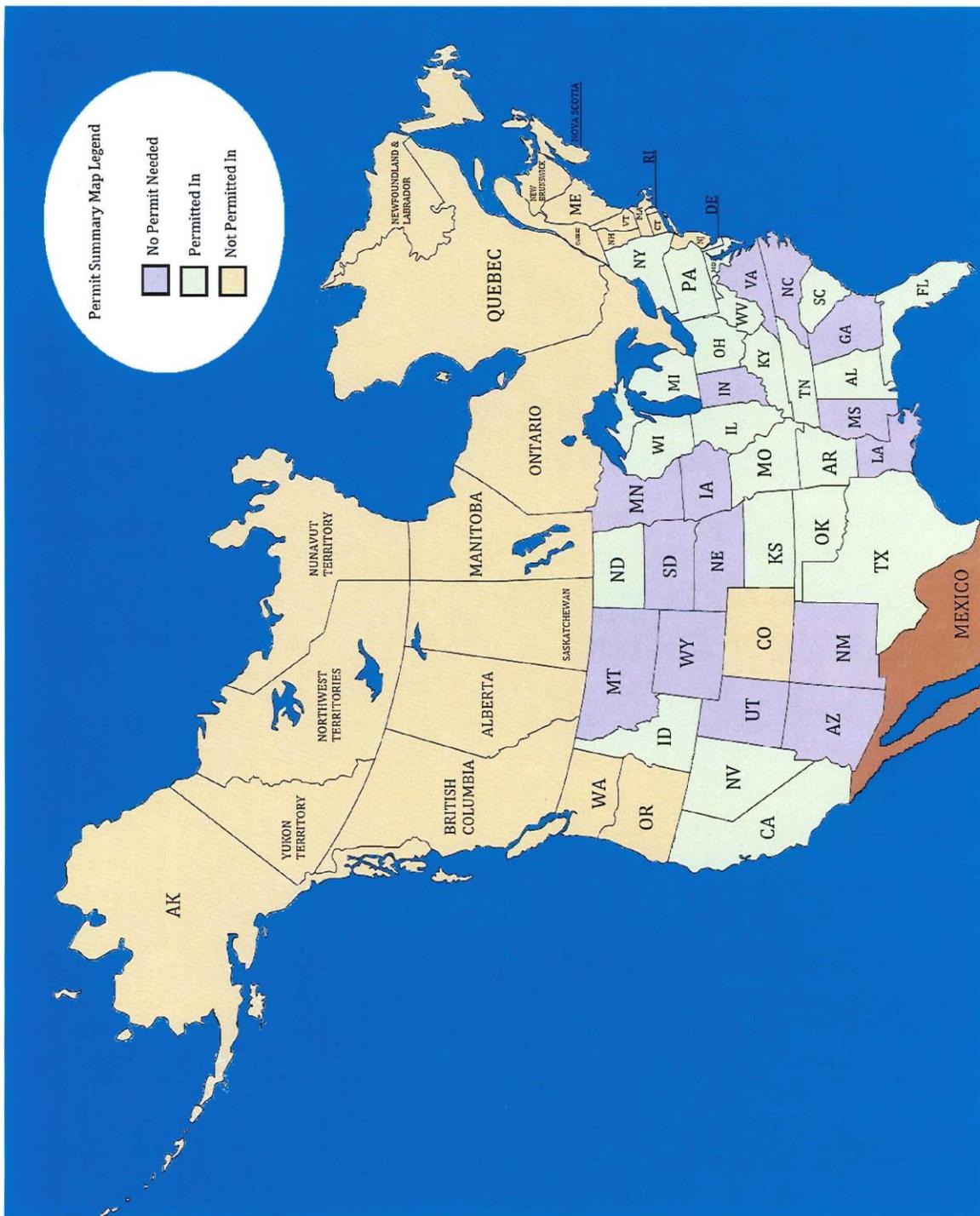
The following must be maintained at the principal place of business for a period of three years from the date of issuance of this Certificate of Registration:

- (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, D.C. 20590, telephone (202) 366-4109.





EPA.Ohio.gov

Mike DeWine, Governor Jim Tressel, Lt. Governor John Logue, Director

June 27, 2025

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

Re: Environmental Enterprises Inc.
Inspection or Compliance Review
Letter of Compliance or Acknowledgement
RCRA C - Hazardous Waste
Hamilton County
OHD083377010

Hazardous Waste Program - DERR

Subject: CEI Letter of Compliance

Dear Mr. McCabe:

Thank you for having Tim Ernstes, Gary Davis, Melissa Joering and Warren Taylor assist me during Ohio EPA's June 11, 2025, Compliance Evaluation Inspection (CEI) of Environmental Enterprises, Inc. (EEI) located 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 August 27, 2020. 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.

Southwest District Office
401 E. Fifth Street
Dayton, Ohio 45402 U.S.A.

937 | 285.6357
epa.ohio.gov

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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/divisions-and-offices/environmental-response-revitalization>.

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

Sincerely,

Jeff Smith

Jeff Smith, SWDO
Hazardous Waste Program
Division of Environmental Response and Revitalization

cc. George Strobel, Southwest District Office, DERR
Zak Kabelen, CO, DERR
EPA.RCRAInfoData@epa.ohio.gov

JS/cf



EPA.Ohio.gov

Mike DeWine, Governor Jon Husted, Lt. Governor Anne M. Vogel, Director

October 16, 2024

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

Re: Environmental Enterprises Inc.
Inspection or Compliance Review
Correspondence
RCRA C - Hazardous Waste
Hamilton County
OHD083377010

Hazardous Waste Program - DERR

Subject: CEI Inspection Report Transmittal Letter

Dear Mr. McCabe:

Thank you for meeting with me and having Gary Davis accompanying me during Ohio EPA's August 15, 2024 Compliance Evaluation Inspection (CEI) of Environmental Enterprises Inc's (EEI) facility located at 4650 Spring Grove Ave, Cincinnati, Ohio. The inspection included a review of EEI's operations and written documentation associated with facility operations.

On October 10, 2024 Ohio EPA sent you a Notice of Violation (NOV) letter outlining the violations that were observed during the August 15, 2024, inspection. Enclosed is a copy of the complete inspection report which contains an inspection narrative and completed inspection checklist.

Please be advised that this inspection report 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.

You can find Ohio's hazardous waste rules and other information on the division's web page at: <https://epa.ohio.gov/divisions-and-offices/environmental-response-revitalization>.

Southwest District Office
401 E. Fifth Street
Dayton, Ohio 45402 U.S.A.

937 | 285 6357
epa.ohio.gov

The State of Ohio is an Equal Opportunity Employer and Provider of ADA Services



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

ec: George Strobel, Southwest District Office, DERR
Zachary Kabelen, CO, DERR

Enclosure

JS/cf



HAZARDOUS WASTE PROGRAM INSPECTION REPORT FORM OHIO EPA			
Facility:	Environmental Enterprises, Inc.	US EPA ID #:	OHD083377010
Street Address:	4650 Spring Grove Ave.	Phone #:	513-298-7154
City, State and Zip Code:	Cincinnati, Ohio 45232	Generator Status:	TSD
County:	Hamilton	Inspection Date:	8/15/2024
Facility Contact:	Dan McCabe Gary Davis	Ohio EPA Inspector:	Jeff Smith

PURPOSE OF INSPECTION

An announced Compliance Evaluation Inspection (CEI) of Environmental Enterprises, Inc.'s (EEI) facility located at 4650 Spring Grove Ave, Cincinnati, Ohio took place on August 15, 2024. The CEI was conducted by the Ohio Environmental Protection Agency (Ohio EPA) as an evaluation of the company's compliance with provisions of the Ohio's Hazardous Waste Regulations as authorized by U.S. EPA in accordance with the Resource Conservation and Recovery Act (RCRA). The CEI was a routine evaluation of EEI's compliance with the Ohio hazardous waste laws and EEI's Ohio hazardous waste installation and operation permit issued August 27, 2020.

ARRIVAL ON-SITE

I arrived on site, signed into the visitor log, and met with Dan McCabe and Gary Davis. Because EEI has participated in multiple Ohio EPA inspections, I did not need to explain what would occur during the inspection. I did discuss the notice of non-compliance letter concerning the two 5-gallon lab packs of organic peroxides (1 year storage date June 6, 2024) and the nine 1.5-gallon lab packs of Varox paste peroxide (1 year storage date June 29, 2024). Gary informed me they actually had ten (10) 1.5-gallon lab packs of Varox paste peroxide and they sent this material off-site for disposal on August 8, 2024. They were only able to send one 5-gallon lab pack of organic peroxides, Type C off-site for disposal on August 8, 2024. At the time of the inspection EEI still had one 5-gallon lab pack of organic peroxides, Type D. Gary informed me that EEI would have to process this waste on-site. Gary gave me a copy of the August 8, 2024, manifests.

FACILITY INSPECTION

We began the facility walk-through in the Main building. I walked through each of the container storage areas and rows in the Main Plant. We Walked the lab pack area, Area A, the Oxidizer room, Acid room, non-hazardous Shredder area, Reactor tank #4 room, Water Reactive room, Process tanks 1 and 2, and the Flammable storage area. No issues were noted during the inspection of the Main Plant. A detailed description of the Main Plant's storage and treatment processes can be found in EEI's permit application. Next, we walked out back of the Main Plant to the Roll-off container storage area. I noted two roll-offs of inorganic debris dated July 8, 2024, and July 22, 2024. Each roll-off was tarped (closed), properly labeled, and dated.

We walked down the southside of the plant and walked by the Trailers stored along the Mill creek. Several of the trailers contained household hazardous waste (HHHW). A couple of the trailers we were not able to open. Gary sent me information on those later that day, one was empty, one contained skitter dust and the other was used for wood skids. We then walked to the Annex and went down into the basement first. They did have some hazardous waste and HHHW in the basement. Next, we walked the west end first floor, which includes hazardous and non-hazardous container storage. I also inspected the Used Oil tank located on the first floor. No violations were noted on the first floor. We then continued up to the 4th floor of the Annex. Here they store household pesticides (solids) in cubic yard boxes and liquid pesticides in plastic or steel drums. Solids are bulked for disposal in a hazardous waste landfill and the liquids are bulked into totes that are sent for incineration. Bulking of pesticides is usually done in the winter months. No violations were noted on the 4th floor.

Next, we walked the 3rd floor of the Annex. Here EEI stores boxes of propane tanks from households, fire extinguishers in drums and boxes, and materials collected from HHHW collection events. No violations or issues of concern were

Environmental Enterprises, Inc.
 August 15, 2024
 Page 1 of 1



noted. We then walked down to the 2nd floor of the Annex and walked through the rows of container storage. The second-floor container storage is larger than the 3rd floor because it extends into the middle of EEI's plant. We continued to inspect all rows of containers and did not note any violations or issues of concern.

We finished the facility walkthrough on the 1st floor of the facility working our way back to the Main Plant, this included storage for universal waste, metals recovery waste, aerosol cans, and other hazardous waste containers. No violations were noted.

At the end of the walk through we discussed the paperwork I would need to look at and asked that it be sent via e-mail for review. On September 16th and 17th EEI submitted new employee training attendance sheets, employee training attendance sheets, weekly inspections logs, and daily inspections logs. Manifests were reviewed on-line, and the Contingency Plan was not reviewed since there have been no changes since the last inspection.

EEI was informed they would receive violations for the containers stored for greater than 1 year.



EPA.Ohio.gov

Mike DeWine, Governor Jon Husted, Lt. Governor Anne M. Vogel, Director

October 10, 2024

Mr. Daniel McCabe
Environmental Enterprises, Inc.
10163 Cincinnati-Dayton Road
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 meeting with me and Gary Davis for accompanying me during Ohio EPA's August 15, 2024, 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 August 27, 2020. The inspection included a review of EEI's operations and written documentation associated with facility operations.

Findings

Ohio EPA observed the following violations of Ohio's hazardous waste laws, rules and EEI's permit terms and conditions. To bring EEI into compliance, Ohio EPA recommends promptly addressing these violations within 14 days of your receipt of this letter.

- 1. Unpermitted Storage of hazardous waste; ORC § 3734.02 (E) and (F); OAC rules 3745-50-41(A) and 50-45(A):** The Permittee is authorized to store hazardous waste on-site for up to one year at any given time in the permitted container storage areas at the facility.

On July 15, 2024, EEI notified Ohio EPA they had several containers that exceeded EEI's one year storage limit. During the August 15, 2024, inspection Ohio EPA

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Dayton, Ohio 45402 U.S.A.

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confirmed two 5-gallon lab packs of organic peroxides (D001, D003), one Type C and one Type D liquid, dated June 6, 2023, and Nine (9) 1.5-gallon lab packs of organic peroxides (D001, D003), dated June 29, 2023 exceeded the one-year storage limit. Ohio EPA has determined that EEI unlawfully stored hazardous waste at the facility by storing hazardous waste exceeding EEI's one year storage limit on June 6, 2024, and June 29, 2024, in violation of ORC § 3734.02 (E) & (F) and OAC rules 3745-50-41(A) and 3745-50-45(A).

Since EEI violated ORC Section 3734.02 (E) & (F) by storing hazardous waste for greater than one year, it is subject to the closure and financial assurance requirements in OAC Rules 3745-55-10 through 3745-55-48. Therefore, EEI may be required to submit a closure plan for the area where the hazardous waste was being stored. A closure plan describes the steps necessary to investigate the extent of contamination and to clean up all contamination found. Additionally, at any time, Ohio EPA may assert its right to have EEI begin facility-wide cleanup, pursuant to the Corrective Action process under Ohio law.

During the August 15, 2024, inspection Ohio EPA received copies of hazardous waste manifest numbers 025466612 JJK and 022993116 JJK both dated August 8, 2024, which included the shipment off-site of 10 (ten) 1.5-gallon lab packs of Varox Paste (di-(2,4-dichlorobenzoyl) peroxide (405 days) and one 5-gallon lab pack of organic peroxides, Type C (427 days).

EEI was unable to ship off-site one 5-gallon lab pack of organic peroxides, Type D. EEI stated they will need to process this waste on-site. As of October 4, 2024, the waste had not been processed and was still on-site.

In order to resolve the violations, Ohio EPA recommends that EEI process the 5-gallon lab pack of organic peroxides (Type D) and submit documentation to this office for review.

- 2. General requirements for Land Disposal Restrictions, Permit Condition B.40, OAC Rule 3745-270-50(B)** An owner or operator of a treatment, storage, or disposal facility may store such wastes for up to one year unless Ohio EPA can demonstrate that such storage was not solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal. On July 15, EEI notified Ohio EPA they had several containers that exceeded EEI one year storage limit. During the August 15, 2024, inspection Ohio EPA confirmed the two 5-gallon lab packs of organic peroxides, one Type C and one Type D liquid, dated June 6, 2023, and Nine (9) 1.5-gallon lab packs of organic peroxides dated June 29, 2023 exceeded the one-year storage limit.



During the August 24, 2024, inspection Ohio EPA received copies of hazardous waste manifest numbers 025466612 JJK and 022993116 JJK both dated August 8, 2024, which included the shipment off-site of 10 1.5-gallon lab packs of Varox Paste (di-(2,4-dichlorobenzoyl) peroxide (405 days) and one 5-gallon lab pack of organic peroxides, Type C (427 days).

EEl was unable to ship off-site one 5-gallon lab pack of organic peroxides, Type D. EEl stated they will need to process this waste on-site. As of October 4, 2024, the waste had not been processed and was still on-site.

In order to resolve the violations, Ohio EPA recommends that EEl process the 5-gallon lab pack of organic peroxides, Type D and submit documentation to this office for review.

3. Duty to Comply, Permit Condition A.5, OAC Rule 3745-50-58(A), Duty to Comply:

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 such noncompliance is authorized by the laws of the State of Ohio. Any permit noncompliance, other than noncompliance authorized by the laws of the State of Ohio, constitutes a violation of ORC Chapter 3734 and is grounds for enforcement action, revocation, modification, denial of a permit renewal application or other appropriate action.

EEl failed to comply with Permit Condition A.5 and OAC Rule 3745-50-58(A) when they did not comply with all the conditions of their permit.

Conclusion

The Ohio EPA requests that EEl promptly undertake the necessary measures to return to compliance with Ohio's environmental laws and rules. Within 14 days of receipt of this letter, please provide documentation to Ohio EPA of the actions taken to resolve the violations cited above. If you have already resolved the violations listed above, thank you, and please provide documentation supporting compliance. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs as appropriate may be submitted via the postal service or electronically to jeff.smith@epa.ohio.gov.

Please be advised that violations cited above will continue until the violations have been properly resolved. Failure to comply with Chapter 3734. of the ORC and rules promulgated thereunder may result in an administrative or civil penalty.



The submission of any requested information in response to this letter does not constitute waiver of the Ohio EPA's authority to seek administrative or civil penalties as provided in Chapter 3734. of the ORC.

This NOV is only associated with the 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>.

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

ec: George Strobel, Southwest District Office, DERR
Zak Kabelen, Central Office, DERR
EPA.RCRAInfoData@epa.ohio.gov

JS/rr



EPA.Ohio.gov

Mike DeWine, Governor Jon Husted, Lt. Governor Anne M. Vogel, Director

April 24, 2024

Mr. Gary Davis
Environmental Enterprises, Incorporated
4650 Spring Grove Avenue
Cincinnati, Ohio 45232

Re: Environmental Enterprises, Incorporated
Notice of Violation (NOV)
NOV
NPDES
Hamilton County
1GR01518

Subject: Notice of Violation

Dear Mr. Davis:

Ohio EPA, Division of Surface Water (DSW), conducted an inspection of Environmental Enterprises, Incorporated located at 4650 Spring Grove Avenue, Cincinnati, Ohio in Hamilton County on February 1, 2024. Environmental Enterprises, Incorporated is a Hazardous Waste Treatment, Storage, or Disposal facility (TSDF) that is regulated under Activity Code HZ, Subsector K1 of Ohio EPA's Authorization to Discharge Stormwater Associated with Industrial Activity Under the National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit (MSGP).

Ohio EPA, DSW requested Environmental Enterprises, Incorporated submit the facility's Stormwater Pollution Prevention Plan (SWPPP), routine inspection reports, quarterly visual assessments, annual training documentation, annual report as well as upload Electronic Discharge Monitoring Reports (eDMR) into the Ohio EPA eBusiness Center during the inspection and via electronic mail on February 7, 2024. The available documentation was submitted on March 1, 2024 and March 7, 2024.

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Page 2 of 4

As was discussed, the goal of our inspection was to determine your facility's compliance with Ohio's environmental laws and regulations and the terms and conditions of Environmental Enterprises, Incorporated's MSGP coverage, OHR000007 under 1GR01518 issued on March 28, 2023.

Violations

Ohio EPA DSW determined the following violations of Ohio's environmental laws and regulations and Environmental Enterprises, Incorporated permit terms and conditions. It is recommended you promptly address the violations.

- Violation Description:** Environmental Enterprises, Incorporated failed to conduct annual training for all employees who work in areas where industrial materials or activities are exposed to stormwater, or who are responsible for implementing activities necessary to meet the conditions of this permit (e.g., inspectors, maintenance personnel), including all members of your Pollution Prevention Team as specified in Part 2.1.2.9 of the MSGP. This is a violation of ORC 6111.04(A) and Part 2.1.2.9 of the MSGP.

Requested Action: Please develop a plan to conduct annual training and maintain a record of the training with the SWPPP.

- Violation Description:** Environmental Enterprises, Incorporated failed to conduct routine inspections as specified in Parts 4.1 of the MSGP. This is a violation of ORC 6111.04(A) and Part 4.1 of the MSGP.

Requested Action: Please conduct routine facility inspections at least quarterly and document the findings of each inspection performed and maintain this documentation onsite with your SWPPP.

- Violation Description:** Environmental Enterprises, Incorporated failed to document quarterly visual assessments as specified in Part 4.2.2 of the MSGP. This is a violation of ORC 6111.04(A) and Part 4.2.2 of the MSGP.

Additional Information: Environmental Enterprises, Incorporated visual assessment documentation failed to include nature of the discharge (i.e., runoff or snowmelt),



Page 3 of 4

date and time discharge began, date and time for each sample collection, visual assessment date and time for each sample and if applicable, why it was not possible to take samples within the within the first 30 minutes.

Requested Action: Please develop a tool to document all the elements specified in Part 4.2.2 of the MSGP for quarterly visual assessments.

4. **Violation Description:** Environmental Enterprises, Incorporated failed to develop a SWPPP that contained all the elements as specified in Part 5.1 of the MSGP. This is a violation of ORC 6111.04(A) and Part 5.1 of the MSGP.

Additional Information: The SWPPP must contain all the following elements

- Stormwater pollution prevention team (see Part 5.1.1);
- Site description (see Part 5.1.2);
- Summary of potential pollutant sources (see Part 5.1.3);
- Description of control measures (see Part 5.1.4);
- Schedules and procedures (see Part 5.1.5); and
- Signature requirements (see Part 5.1.6).

Requested Action: Please develop a comprehensive SWPPP containing all the elements specified in the MSGP.

5. **Violation Description:** Environmental Enterprises, Incorporated failed to complete an annual report as specified in Part 7.2 of the MSGP. This is a violation of ORC 6111.04(A) and Part 7.2 of the MSGP.

Requested Action: Please ensure annual reports are completed using the reporting form, Appendix I of the MSGP and maintain with your SWPPP.

Conclusion

Within 30 days of receipt of this letter, please provide documentation to Ohio EPA DSW of the actions taken and/or will be taken to resolve the violations cited above. Documentation of steps taken to resolve this violation includes but is not limited to: written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to michelle.flanagan@epa.ohio.gov. If circumstances delay



Page 4 of 4

resolution of violations, Environmental Enterprises, Incorporated is requested to contact Ohio EPA DSW to discuss the situation and propose an alternative schedule to resolve the violations in a timely manner.

Failure to comply with Chapter 6111 of the Ohio Revised Code and rules promulgated thereunder may result in an administrative or civil penalty.

Please note that the submission of any requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek administrative or civil penalties as provided in Chapter 6111.09 of the Ohio Revised Code.

Should you have any questions, please contact Michelle Flanagan at 937.285.6440 or email at michelle.flanagan@epa.ohio.gov.

Sincerely,

A handwritten signature in blue ink that reads "Michelle Flanagan".

Michelle Flanagan
Environmental Specialist II
Division of Surface Water
Southwest District Office

ec: Scott Sheerin, DSW, CO
Wesley Sluga, DSW, CO
Mr. Gary Davis, Environmental Enterprises, Incorporated

MF/cf



Mike DeWine, Governor
Jon Husted, Lt. Governor
Anne Vogel, Director

April 10, 2023

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

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 speaking with me on March 31, 2023, regarding Environmental Enterprises Inc (EEI) located at 4650 Spring Grove Ave, Cincinnati, Ohio. On April 5, 2023, Ohio EPA conducted a facility walk-through of EEI. The goal of this Compliance Evaluation Inspection (CEI) 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 August 27, 2020. 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/divisions-and-offices/environmental-response-revitalization/environmental-response-and-revitalization>.

Southwest District Office • 401 East Fifth Street • Dayton, OH 45402-2911
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Environmental Enterprises Inc
April 10, 2023
Page 2 of 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

ec: George Strobel, Southwest District Office, DERR
Zak Kabelen, CO, DERR
EPA.RCRAInfoData@epa.ohio.gov

JS/cf



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.**

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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.

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



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>.

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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



From: Lauren Monahan [mailto:lmonahan@lexingtonky.gov]
Sent: Tuesday, May 03, 2016 5:16 PM
To: Tom McCabe
Subject: RE: HHW

Tom,

On behalf of our entire team here at Lexington-Fayette Urban County Government, I would like to take the opportunity to let you know what a pleasure it was to work with all of EEP's knowledgeable staff to make our city's event more successful than we could have imagined!

From the beginning of the planning process to the event itself (as well as the close out procedures, grant reporting requirements, etc.), you and the staff worked to make everything run so very smoothly and efficiently. Your team made the project look effortless. The proper management of hazardous wastes collected as well as safety was top notch.

We have heard nothing but positive feedback from our residents about the event. What we have found residents most impressed with in particular has been the organization of the event as well as the kindness of all who worked that day.

Thanks again to you, Dan, Brian and the entire team that assisted in the execution of such a great collection event. I myself learned a lot and appreciate the guidance you provided along the way.

Kind regards, and we hope to have the opportunity to work with you again,

Lauren Monahan

Lauren Monahan
Environmental Outreach Specialist
Division of Waste Management



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,

A handwritten signature in black ink that reads 'Dan Rock'.

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



Ottawa • Sandusky
Seneca County



**JOINT
SOLID WASTE
MANAGEMENT
DISTRICT**

TIM WASSERMAN
Director

tw@recycleoss.org

AMY DRUMMER
Assistant Director

ad@recycleoss.org

JIM DARR
Recycling Specialist

jdarr@recycleoss.org

JAMIE COLEMAN
*Community Outreach
Specialist*

jcoleman@recycleoss.org

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July 18, 2018

Letter of Recommendation

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



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 for our program information. Also feel free to contact me directly at (412) 488-7490 x213 or michaels@prc.org with any questions or if you require additional information.

Sincerely,

Michael Stepaniak
PA Resources Council
Environmental Programs Coordinator



January 9, 2014

To Whom It May Concern:

I am writing to attest that Butler County Recycling & Solid Waste District has had a positive experience with Environmental Enterprises as its contracted agent for management of residential Household Hazardous Waste (HHW). In partnership with Environmental Enterprises, Butler County provides weekly residential HHW drop off service that has been "incident-free" for the past seven years. Environmental Enterprises has managed all aspects of service delivery for the Hazardous Waste Management program – from setting up collection stations, to providing customer greeting, data intake, and unloading customer materials, to sound management and final disposition of all materials and data collection.

The customer experience when discarding Hazardous Waste through the county's long term drop off program has been exemplary – Environmental Enterprises has provided the public with exceptionally efficient service, excellent professional public interaction, and a high level of accountability. We are pleased to provide testimony of the superlative experience we have had for managing residential household hazardous waste with the help of Environmental Enterprises Inc.

The oversight, accountability, and value that we have derived from our Hazardous Waste management experience with Environmental Enterprises has encouraged growth of the program, and ongoing public participation. The consumer experience has been positive and this ensures confidence in the county's service and safeguards public health for our community.

Feel free to contact me with any specific questions at (513) 887-3963.

BUTLER COUNTY RECYCLING & SOLID WASTE DISTRICT

A handwritten signature in black ink that reads "Anne F. Flaig". The signature is written in a cursive, flowing style.

Anne Fiehrer Flaig, District 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

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EXECUTIVE DIRECTOR

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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 41 years' experience in the environmental industry.
- ◆ > 100 Collection Events
- ◆ 36 years' experience performing technical evaluations of industrial wastewater problems.
- ◆ 33 years' experience in design of physical, chemical and biological treatment plants.
- ◆ 30 years as a consultant for on-site remediation activities, hazardous waste disposal, industrial waste treatment techniques and permitting issues.
- ◆ 29 years of experience in developing SPCC programs for local manufacturing firms.



Brian J. DePeel
Program Manager

Education / Training:

B.A., Music Education and Music Performance; University of Michigan, 1979

- ◆ OSHA 40-Hour HAZWOPER Training
- ◆ OSHA 8-hour HAZWOPER Refresher Training
- ◆ DOT Hazardous Material Handling & Shipping
- ◆ Blood Borne Pathogens
- ◆ Contingency Plan
- ◆ Fall Protection – 29CFR 1926, Subpart M
- ◆ Hearing Conservation
- ◆ Confined Space Entry Overview
- ◆ Medical Surveillance Program
- ◆ Lead Standard Training
- ◆ Hazardous Communications Standard
- ◆ Respiratory Protection
- ◆ Personal Protective Equipment
- ◆ Powered Industrial Trucks
- ◆ Control of Hazardous Energy for Affected Employees
- ◆ Respiratory Fit Testing

HHW CONTRACT SKILLS AND EXPERIENCE

- ◆ > 100 Collection Events
- ◆ 20 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

- ◆ 32 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.
- ◆ >20 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.
- ◆ 14 years experience in training, DOT, Hazardous Materials Transportation

Summary:

A manager for over 19 years with 26 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
- ◆ >100 Collection Events
- ◆ Fluent in all Inorganic Wet Chemistry Analysis
- ◆ Fluent in Sample Preparation Procedures
- ◆ Knowledgeable in Waste Characterization, Analysis, and Profiling Procedures

Summary:

Over 30 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

- ◆ 24 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

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

Summary:

A total of 30 years' experience with administrative duties including invoicing, bid and quote preparations, budget management, traffic coordinator, and 14 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

HHW CONTRACT SKILLS AND EXPERIENCE

- ◆ >100 Collection Events
- ◆ Segregation of Household Hazardous Waste
- ◆ Labeling and Manifesting HHW Waste
- ◆ Project Management

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.

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. Orange arrows indicate traffic flow through the site).

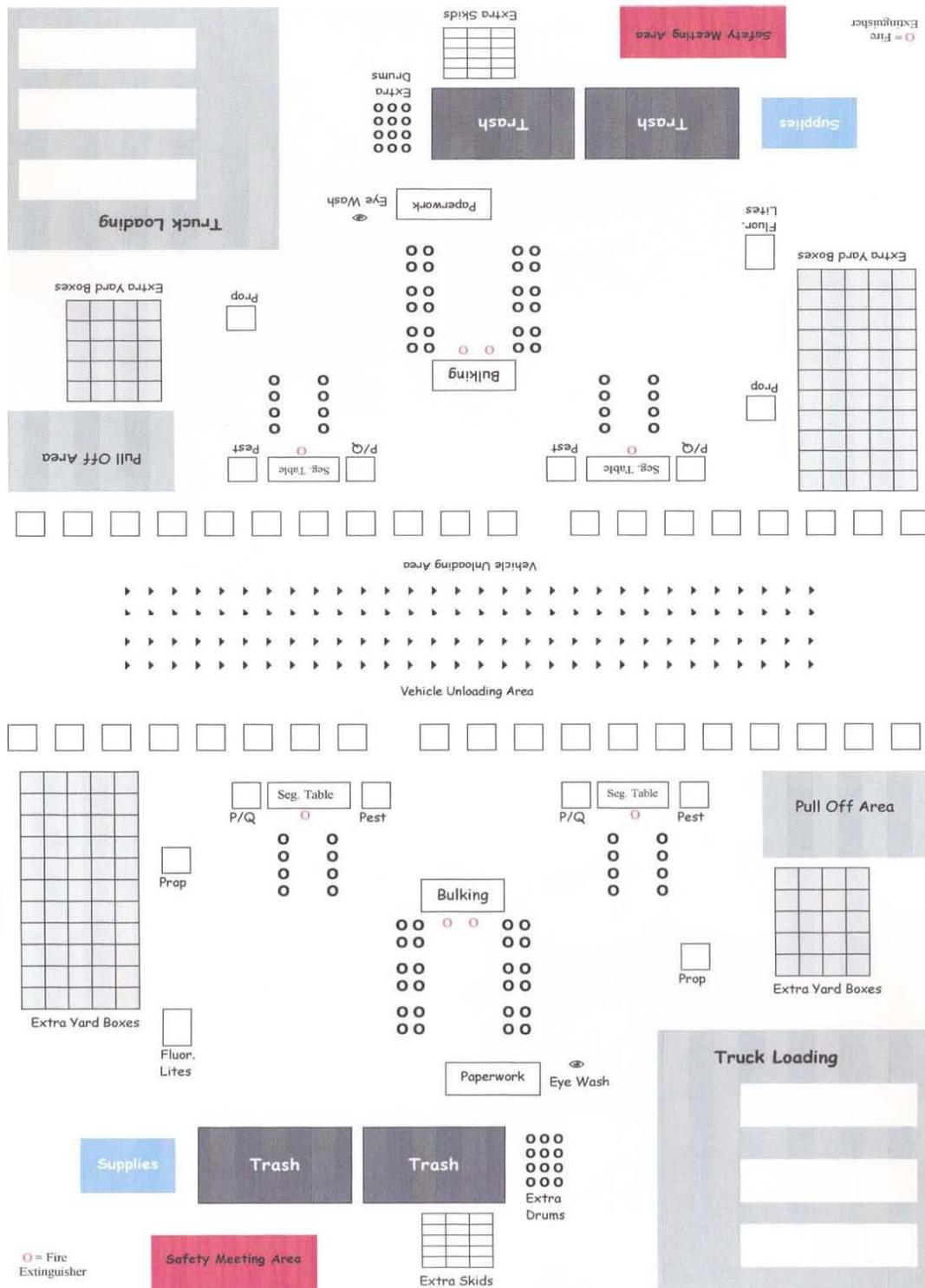
Please provide examples of set-up diagrams for events conducted by your company, especially those with a high volume of traffic that include four lanes. Diagrams should include the following areas: Vehicle Unloading, Material Identification and Separation, Material Bulking, Non-Regulated Waste Disposal, 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.

EVENT AREA 605 x 630 feet



RFP #21-2025 Household Hazardous Waste Collection Events
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		



**RFP #21-2025 Household Hazardous Waste Collection Events
Lexington-Fayette Urban County Government**

HHW Equipment List

Supervisor: _____
Trailer Number: _____
Number of Vehicles: _____

Job Location: _____
Event Date: _____
Collection Times: _____

Work Order No:
Comp. By: DePeel
Date:

MET Rented Trailer Date Rented: _____ Date Returned: _____

<u>Transportation</u>	<u>Req'd</u>	<u>Comp.</u>	<u>Trailer#</u>	<u>PPE</u>	<u>Req'd</u>	<u>Comp.</u>	<u>Trailer#</u>	<u>Site Preparation</u>	<u>Req'd</u>	<u>Comp.</u>	<u>Trailer#</u>
Tractor Trailer				Safety Glasses				Shrink Wrap			
Straight Trucks				Face Shields				Traffic Cones			
Roll-off Boxes				Yellow Tyveks (Case)				Plastic – 20 x 100			
Forklift Carrier				White Tyveks (Case)				Plastic – 40 x 100			
				Cloth Gloves				Plywood			
				Black Gloves (Pair)				Warning Signs			
Materials Handling				Latex Gloves (Boxes)				Shovels			
Fork Lifts				Dust Masks				Brooms			
Propane Tanks				Sweat Bands				Duct Tape			
Pallet Jack				Emer. Response				55 Gal Water Drums			
Skids BIG				Org Sorbent Pads (Bundle)				Bungs (Bucket)			
Carts				Inorg Sorbent Pads (Bndle)				Water Cooler			
Oil Totes				Oil Dry Bags				Hand Soap			
Drum Funnels				Fire Extinguishers				Paper Towels			
Gird. Rods/cables				First Aid Kits				Tool Box			
Bung Wrenches				Portable Eyewash				5 Gal Water Drum w/spicket			
Razor Knives											
Hazcat Kits											
				Marking & Labeling				Documents			
Packaging				Labeling Kits	Lpk			Manifests	Lab Pack		
Cubic Yard Kits				Grease Pens	Lpk			Bill of Lading	Lab Pack		
Bulk Steel Drums				Ink Pens	Lpk			Profiles	Lab Pack		
55g Steel Drums				Non-Haz Labels	Lpk			Work Orders	Lab Pack		
30 Gal. Drums				Non-Haz HCTs	--			Dir. To Job Site	Lab Pack		
20 Gal. Fibers				Packing Lists	--			Personnel List	Lab Pack		
5 Gal. Polys				Pkg. List Envelopes	--			Personnel Mobilization			
55g Poly Drums								No. of Personnel			
Light Bulb Boxes								EEI Personnel			
Vermiculite (Bags)								GI Personnel			
Roll-off Liners											
Recovery Drums											



OFF-SITE FACILITIES LIST

CEMENT KILN

ESSROC Cement Company (Fuels
Program Managed by C.P. Recycling)
3084 W. County Road 225 South
Logansport, IN 46947
EPA ID: IND 005081542
Phone (574) 753-2675
Contacts: Grant Meeks
Fax: (574) 753-7232

Lone Star Industries
2524 South Sprigg Street
Cape Girardeau, MO 63701
EPA ID: MOD 981127319
Phone: (573) 335-2083
Contact: Dave Jordan
Fax: (573) 335-8992

**Lone Star DBA Buzzi Unicem
Greencastle WDF Facility**
3301 South County Road
Greencastle, Indiana 46135
EPA ID: IND 006419212
Phone (765) 653-8816
Contacts: Tony Bannon
Fax: (765) 653-3556

ORGANIC SLUDGES & SOLIDS FOR FUEL BLENDING

Lone Star Industries
2524 South Sprigg Street
Cape Girardeau, MO 63701
EPA ID: MOD 981127319
Phone: (573) 335-2083
Contact: Dave Jordan
Fax: (573) 335-8992

Giant Resource Recovery-Sumter
755 Industrial Road
Sumter, SC 79151
EPA ID: SCD036275626
Phone: (803) 773-1400
Contact: James Harlan

DEEP WELL INJECTION FOR EEI TREATED WASTEWATERS

Vickery Environmental
3956 State Route 412
Vickery, OH 43464
EPA ID: OHD 020273819
Phone: (419) 547-7791
Contact: Carolyn Golamb
Fax: (419) 547-6144



INCINERATORS (Hazardous Waste)

Clean Harbors, Inc. (Formerly Teris)

309 American Circle
El Dorado, AR 71730
EPA ID: ARD 069748192
Phone: (870) 864-3663
Contact: Tina Estridge
Fax: (870) 864-3674

Veolia Environmental Services

Trade Waste Incineration
7 Mobile Avenue
Sauget, IL 62201
EPA ID: ILD 098642424
Phone: (618) 271-2804
Contact: Jan Gallee
Fax: (618) 271-9704

WTI (Von Roll)

1250 St. George Street
East Liverpool, OH 43920
EPA ID: OHD980613541
Phone: (330) 385-7336
Contact Lorraine Davis
Fax: (330) 385-7813

INCINERATORS (PCB'S)

Veolia Environmental Services (formerly CWM – Port Arthur)

Hwy 73 (3.5 miles W. of Taylor's Bayou)
Port Arthur, TX 77640
EPA ID: TXD 000838896
Phone: (409) 736-2821
Contact: Rosa Landry
Fax: (409) 736-1636

Clean Harbors Deer Park, LP

2027 Battle Ground Road
Deer Park, TX 77536
EPA ID: TXD 000838896
Facility Phone: (281) 930-2300
Contact: Shelby Beilke
Contact Phone: (773) 646-6202
Fax: (773) 646-6280

LANDFILL - SANITARY

Rumpke

10975 Hughes Road
Cincinnati, OH 45251
EPA ID: N/A
Phone: (513) 851-0122
Contact: Greg Spurlock
Fax: (513) 825-4839

Rumpke (Pendleton County Landfill)

1374 Bryan Griffin Road
Butler, KY 41006
EPA ID: KY0000997957
Phone: (800) 367-8235
Contact: Brian Burgemeir
Fax: (859) 472-7021



LANDFILL – SANITARY (Cont.)

Bavarian Landfill

12764 McCoy Fork Road
Walton, KY 41094
EPA ID: N/A
Phone: (859) 485-4416
Contact: Rick Bruggemann
Fax: (859) 485-1406

Waste Management of Ohio

Stony Hollow RDF
2460 South Gettysburg Road
Dayton, Ohio 45118
EPA ID: N/A
Facility Phone: (937) 268-1133
Fax: (937) 268-1133
Contact: Rudy Ramey

LANDFILL (SECURE)

Wayne Disposal, Inc. (E.Q.)

49350 North I-94 Service Drive
Belleville, MI 48111
EPA ID: MID 048090633
Phone: (800) 592-5489
Contact: Melissa Rickabaugh
Fax: (800) 592-5329

Envirosafe Services of Ohio, Inc.

876 Otter Creek Road
Oregon, OH 436165
EPA ID: OHD 045243706
Facility Phone: (800) 537-0426
Contact: Dave Ridgnour
Fax: (419) 698-8663

LANDFILL (PCB)

Wayne Disposal, Inc. (E.Q.)

49350 North I-94 Service Drive
Belleville, MI 48111
EPA ID: MID 048090633
Phone: (800) 592-5489
Contact: Melissa Rickabaugh
Fax: (800) 592-5329

MERCURY & LIGHT BULB RECYCLERS

AERC Recycling Solutions, Inc.

2591 Mitchell Ave.
Allentown, PA 18103
EPA ID: PAD987376726
Phone: (800) 554-2372
Contact: Michelle Park
Fax: (610) 797-7696

Veolia Environmental Services

1275 Mineral Springs Drive
Port Washington, WI 53074
EPA ID:
Phone: (262) 243-8900
Contact:
Fax: (262) 284-3775



STABILIZATION

Michigan Disposal, Inc. (E.Q.)

49350 N. I-94 Service Drive
Belleville, MI 48111
EPA ID: MID 000724831
Phone: (800) 592-5489
Contact: Melissa Rickabaugh
Fax: (800) 592-5329

Envirite

2050 Central Avenue, SE
Canton, OH 44707
EPA ID: OHD 980568992
Phone: (330) 456-6238
Contact: Sam Pantuso
Fax: (330) 456-2801

Stablex of Canada, Inc.

760 Industrial Blvd.
Blainville (Quebec) J7C 3V4
EPA ID: NYD 980756415
Phone: (514) 430-9230
Contact: Natalie Mathieu
Fax: (514) 430-4642

EQ of Detroit

1923 Frederick Street
Detroit, MI 48211
EPA ID: MID980991566
Phone: (313) 923-0080
Contact: Katie Marie
Fax: (313) 923-3375

PCB TREATMENT

Clean Harbors

1672 E. Highland Road
Twinsburg, OH 44087
EPA ID: OHD 986975399
Facility Phone: (330) 425-3825
Contact: Shelby Beilke
Contact Phone: (773) 646-6202
Facility Fax: (330) 487-5784

Clean Harbors

1302 West 38th Street
Ashtabula, OH 44004
EPA ID: OHD 981093420
Facility Phone: (440) 992-8665
Contact: Shelby Beilke
Contact Phone: (773) 646-6202
Facility Fax: (440) 992-5784

WASTEWATERS (NON-D002)

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 9th Street NM
Edmonton, Alberta T6P1L6
EPA ID: N/A
Phone: (780) 440-1825 or (800) 661-5792
Contact: Gerry Gerke
Fax: (780) 440-2428



DIXOIN WASTE (EPA Waste Code F027)

Customs Environmental Services

7722 9th Street NM
Edmonton, Alberta T6P1L6
EPA ID: N/A
Phone: (780) 440-1825 or (800) 661-5792
Contact: Gerry Gerke
Fax: (780) 440-2428
Fax: (865) 588-1544

AEROSOL CANS

Customs Environmental Services

7722 9th Street NM
Edmonton, Alberta T6P1L6
EPA ID: N/A
Phone: (780) 440-1825 or (800) 661-5792
Contact: Gerry Gerke
Fax: (780) 440-2428

Rineco

1007 Vulcan Road P.O. Box 729
Benton, AR 72018
EPA ID: ARD981057870
Phone: (800) 377-4692
Contact: David Spea
Fax: (501) 778-8505

ALKALINE BATTERIES FOR LANDFILL

Envirosafe Services of Ohio, Inc.

876 Otter Creek Road
Oregon, OH 436165
EPA ID: OHD 045243706
Facility Phone: (800) 537-0426
Contact: Dave Ridgnour

NI CD and LITHIUM ION BATTERIES FOR LANDFILL

Stablex of Canada, Inc.

760 Industrial Blvd.
Blainville (Quebec) J7C 3V4
EPA ID: None
Facility Phone: (450) 430-9230
Facility Contact: Natalie Mathieu
Facility Fax: (450) 430-8200



ALKALINE, NI CD, and LITHIUM ION BATTERIES FOR RECYCLING

INMETCO

P.O. Box 720
245 Portersville Road
Ellwood City, PA. 16117
EPA ID: PAD 087561015
Facility Phone: (724) 758-2800
Facility Contact: Marty Clark
Facility Fax: (724) 758-2845
Sales Contact: Al Hardies
Sales Phone: (724) 758-2825

NON-HAZARDOUS WASTE TO ENERGY INCINERATION

COVANTA

2320 South Harding Street
Indianapolis, Indiana 46221
Facility Phone: (317) 634-7367
Sales Contact: Bernie Heille
Sales Phone: 317 299-8412



OPERATIONS PLAN

The execution and ultimate completion of a HHW Collection Event requires a Waste Management Plan. The plan begins with the acceptance of 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

EET will manage all waste materials that EET accepts in this order: (1) Reuse, (2) Recycling, (3) Incineration, and (4) Land Disposal as permitted by law.

Environmental Enterprises, Incorporated (EET) 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. EET 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, EET continues to search for processes that minimize disposal and maximize recycling/reuse and recovery technologies.

EET 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.

EET 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:

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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. EEI personnel will be advised to be very aware of any unusual symptoms in themselves and their fellow workers following any non-routine exposure, no matter how slight, to any poison or suspected poison.

ACIDS AND BASES

Skin contact with an acid or a base may cause chemical burns. Inhalation of vapors from a strong acid or base may cause pulmonary edema (fluid in the lungs), which may occur immediately, or many hours later. Protection from inhalation exposure may be accomplished by the wearing of a respirator with **acid gas** cartridges. Personnel who suspect that they may have breathed acidic or caustic vapors should notify their Lead Tech, and should be alert for the next 24 hours to any delayed onset respiratory symptoms, and should be prepared to seek medical attention in the event that symptoms are noticed.

Inhalation and dermal contact are the primary exposure pathways for these chemicals. It is not anticipated that concentrations of any chemical will reach the permissible exposure limit (PEL). Protective clothing will be mandatory for field personnel working at the site. Respirators will be within easy reach should irritating odors be detected or irritation of the respiratory tract occur. At such a time, personnel will evacuate the area or don respirators without waiting for instruction.

4.5 Task Hazard Analysis

Table 3.1 below gives the hazards expected with each task associated with the removal of waste materials from the site and the minimum level of personal protective equipment (PPE). Levels may be upgraded as appropriate based upon chemicals present, site conditions or as directed by the Project Manager or client representative.



TABLE 4.1. HAZARD EXPECTED AND LEVEL OF PPE

Task	Hazard	Minimum PPE
Materials handling	Sprains/strains; slip trip fall; foot hazard; leaking/damaged containers; chemical contact and exposure; heat-related illness	Level D (Tyvek coverall; steel-toes; safety glasses, latex/nitrile gloves)
Segregation and packaging	Leaking/damaged containers; chemical contact and exposure	Level D (Tyvek coverall; steel-toes; safety glasses, latex/nitrile gloves)
Bulking/consolidating	Open containers; splash; sprains/strains; slip trip fall; foot hazard; leaking/damaged containers; chemical contact and exposure; heat-related illness	Level D (Tyvek coverall; steel-toes; safety glasses, face shield; butyl/Viton gloves, apron APR as warranted or directed)
HAZCAT analysis	Open containers; splash; leaking/damaged containers; chemical contact and exposure	Level D (Tyvek coverall; steel-toes; safety glasses, latex/nitrile gloves, APR as warranted or directed)

4.6 Heat Stress

Physical work during hot weather conditions may lead to heat stress to the worker. The threat of heat stress is exacerbated when personal protective equipment is used in conjunction with the work. The risk of heat stress increases with the increase in level of protective equipment.

The reason is that the human body can function well only within a narrow range of internal body temperature (97-100 degrees Fahrenheit in the normal, healthy range). Hard work (higher metabolism) and outside environmental factors (hot sun, fire, high humidity, etc.) will cause the body temperature to rise. The body will seek to compensate by triggering cooling mechanisms to dissipate the build-up of body heat. There are two basic ways the body cools itself:

1. Perspiration or the release of water as sweat through the skin and sweat glands. Once released, the sweat will evaporate into the atmosphere, thereby cooling the skin and body through absorption of heat of vaporization. This is the primary cooling mechanism.
2. Changes in blood flow to dissipate internal heat by convection. This is observed as the "flushing" or reddening of skin in severe cases of heat stress.

Protective equipment work around the body while providing protection against toxic chemicals, effectively interferes with the evaporation of perspiration and the convection of heat away from the body. The humidity inside a protective suit builds up rapidly and the liquid sweat collects inside the suit, around the shoes and cannot provide cooling by absorbing the heat of vaporization.

All employees who are required to use personal protective equipment will be trained in the recognition and prevention of heat stress.



Major Heat Stress Disorders

Heat cramps: These are painful spasms that occur in the skeletal muscles of workers who have been losing sweat over a period of time. Essential salts or electrolytes are lost through sweating and if they are not replaced, heat cramps will set in. Fatigued muscles are prone to heat cramps that prevent heat cramps as no salt is replaced. Heat cramps may be prevented by drinking electrolytically balanced solutions that are commercially available (e.g. Gatorade) and by the eating of regular meals that contain salt.

Heat exhaustion (heat syncope): This is characterized by weakness, fatigue, dizziness, nausea, and headache. Symptoms may begin mild and progress to severe. In serious cases, the worker may vomit or lose consciousness. The skin of the affected worker is moist and clammy. Complexion is pale or flushed. Body temperature is normal or slightly higher than normal. This condition is caused by the flow of blood in dilated blood vessels of skin and lower parts of body, away from the head and brain. The worker suffering from heat exhaust must be immediately removed to a cool place, be placed lying down, and be allowed to cool off. When conscious, water can be given. Mild cases recover quickly while severe cases may require rest for several days. There are no permanent effects.

Heat stroke: This is a very serious condition that often leads to death. Heat stroke occurs when the body's heat regulation mechanism fails. This means that sweating will stop and the internal body temperature will rise rapidly. The skin is very dry and very hot to the touch. The skin may appear red, mottled, or bluish in appearance. The victim is literally over-heating inside with no ability to cool off. Unconsciousness, mental confusion, and convulsions may occur. Permanent brain damage and death can occur. The body cannot withstand overheating for any length of time. The victim must be removed to a cool place and cooled down artificially, but not too rapidly. Gently and gradually apply water to face, hands, arms, legs and other exposed body surfaces. Fan the person to help gradual evaporation of water. Next, wet whole body and continue cooling by fanning. Call for ambulance and medical assistance.

4.7 Cold Stress

Cold stress occurs when the worker must work outside under winter conditions. When exposed to a cold environment, the body will increase its rate of metabolism to generate more heat. Shivering is one way of increasing metabolism. Yet the extremities may still be chilled and may suffer frostbite. Frostbite causes the skin of the affected area to turn white or gray; pain may be felt initially but may disappear and the area may just feel numb. Severe injury may result when the extremity starts to freeze. Cold stress is exacerbated by high wind velocity (wind chill) and when the body is wet or soaked with water.

Workers must keep their core body temperature above 98.6 degrees Fahrenheit. A lowering of the core body temperature is also called hypothermia. Any lower core body temperature will cause loss of mental alertness, reduction in rational decision making ability, loss of consciousness, and death in extreme cases (at about 78 degrees Fahrenheit of core body temperature). Hypothermia victims may experience a false sensation of external warmth while the internal body temperature is falling dangerously.

Victims of frost bite and hypothermia must be removed to a warm room and the affected areas must be warmed quickly. This can be done by immersion in warm, but not hot water.



When working outside in moderately cold weather, the worker must dress warmly and keep dry. Work outside should be suspended in extreme cold and when there is a high wind chill.

5.0 PERSONNEL TRAINING REQUIREMENTS

In accordance with OSHA's 29 CFR 1910.120 regulation covering Hazardous Waste Operations and Emergency Response, all site personnel are required to be trained in accordance with the standard. At a minimum, all personnel are required to be trained to recognize the hazards on-site, the provisions of the HASP, and the responsible personnel. Furthermore, all personnel shall be trained in the provision of the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

5.1 Pre-assignment and Annual Refresher Training

Prior to arrival on-site, EEI and every contractor will be responsible for certifying its employees meet the requirements of pre-assignment training. Consistent with OSHA 29 CFR 1910.120 (e) (3), each employee should be able to provide a document certifying dates of training for general site workers. All Personnel must receive 8 hours of annual refresher training.

5.2 Medical Surveillance

All EEI personnel engaged in work at the sites that involve the use of a respirator participate in a medical surveillance program. EEI employees must be cleared by an examining physician to wear a respirator and personal protective equipment, should the need arise, while performing work at the site.

5.3 Respiratory Protection Program

EEI personnel wearing air-purifying respirators onsite should be properly trained, fit-tested and certified for use of the respirator. All respirators are to be decontaminated at the end of each workday. Persons with beards or facial hair will not be permitted to wear a respirator if a proper mask-to-face seal cannot be demonstrated by a fit test.

6.0 PERSONAL PROTECTIVE EQUIPMENT

This section describes the general requirements of the EPA designated Levels of Protection (A-D), and the specific levels of protection required for each task at the site.

6.1 Levels of Protection

Personnel wear protective equipment when response activities involve known or suspected atmospheric contamination, when vapors, gases, or particulates may be generated by site activities, or when direct contact with skin-affecting substances may occur. Full face-piece respirators protect lungs, gastrointestinal tract, and eyes against airborne toxicants.

Chemical-resistant clothing protects the skin from contact with skin-destructive and absorbable chemicals.

The specific levels of protection and necessary components for each have been divided into four categories according to the degrees of protection afforded:



Level A (if the need for Level A is expected or possible, a Site-Specific HASP should be generated): Should be worn when the highest level of respiratory, skin, and eye protection is needed. Should be used when first entering an unknown environment that is deemed to be hazardous. The use of Level A protection is anticipated for the site characterizations operations at the site of waste streams and residues that are unknown.

Level B: Should be worn when the highest level of respiratory protection is needed, but a lesser of skin protection. Level B is the primary level of choice when encountering high hazardous environments that have previously been assessed or characterized.

Level C: Should be worn when the criteria for using air purifying respirators are met, and a lesser level of skin protection is needed. Will not protect against oxygen deficient atmosphere or atmospheres containing high levels of toxic airborne contaminants. Consult OSHA regulations on permissible exposure levels and respirator protection factors.

Level D: Should be worn only as a work uniform and not in any area with respiratory or skin hazards. It provides minimal protection against chemical hazards.

Modifications of these levels are permitted, and routinely employed during site work activities to maximize efficiency. For example, Level C respiratory protection and Level D skin protection may be required for a given task. Likewise the type of chemical protective ensemble (i.e., material, format) will depend upon contaminants and degrees of contact.

The Level of Protection selected is based upon the following:

- Type and measured concentration of the chemical substance in the ambient atmosphere and its toxicity.
- Potential for exposure to substances in air, splashes of liquids, or other direct contact with material due to work being done.
- Knowledge of chemicals on-site along with properties such as toxicity, route of exposure, and contaminant matrix.

In situations where the type of chemical, concentration, and possibilities of contact are not known, the appropriate Level of Protection must be selected based on professional experience and judgment until the hazards can be better identified. The Health and Safety Officer shall review all decisions on the use of personal protective equipment, with the concurrence of the Health and Safety Director.

6.2 Level A Personal Protective Equipment

The use of Level A is not expected on this project. Level A consists of a fully encapsulated, multiple lined chemical resistant suit used in combination with a self-contained breathing air apparatus.



6.3 Level B Personal Protective Equipment

Full face-piece, supplied-air respirator (NIOSH approved) should be used. Respirators may be positive pressure-demand, self-contained breathing apparatus (SCBA), or positive pressure-demand, airline respirator (with escape bottle for IDLH or potential for IDLH atmosphere).

- Chemical-resistant clothing (overall and long-sleeved jacket; hooded, one or two-piece chemical-splash suit; disposable chemical-resistant, one-piece suits)
- Gloves (outer), chemical-resistant
- Gloves (inner), chemical-resistant
- Boots (outer), chemical-resistant, steel toe and shank
- Boot covers (outer), chemical-resistant (disposable)

The use of Level B is not anticipated during the course of this work.

6.4 Level C Personal Protective Equipment

- Full face-piece, air-purifying respirator, with canister or cartridge filter.
- Chemical-resistant clothing (overalls and long sleeved jacket; hooded, one or two-piece chemical splash suit, disposable chemical resistant one-piece suit).
- Inner and outer chemical resistant gloves.

OPTIONAL EQUIPMENT

- Coveralls
- Disposal boot covers
- Escape respirator
- Long cotton underwear (for cold weather service)

The use of level C may be required during course of this work.

6.5 Level D Personal Protective Equipment

- Uniform or work clothes
- Safety boots/shoes
- Safety glasses or chemical goggles
- Nitrile/latex gloves

OPTIONAL EQUIPMENT

- Chemical resistant gloves (inner/outer)
- Escape respirator
- Face shield and goggles

The use of Level D may be used during truck loading operations



6.6 Reassessment of Protection Program

The Level of Protection provided by PPE selection shall be upgraded or downgraded based upon a change in site conditions or findings of investigations.

When a significant change occurs, the hazards should be reassessed. Some indicators of the need for reassessment are:

- Commencement of a new work phase, such as the start of drum sampling or work that begins on a different portion of the site.
- Change in job tasks during a work phase.
- Change of season/weather.
- When temperature extremes or individual medical considerations limit the effectiveness of PPE.
- Contaminants other than those previously identified are encountered.
- Change in ambient levels of contaminants.
- Change in work scope which effects the degree of contact with contaminants.

6.7 Work Mission Duration

Before the workers actually begin work in the PPE ensembles, the anticipated duration of the work mission should be established. Several factors limit mission length, including:

- Air supply consumption (SCBA use).
- Suit/Ensemble permeation and penetration rates for chemicals (Section 5.8).
- Ambient temperature and weather conditions (heat stress, cold stress).
- Capacity of personnel to work in PPE.

6.8 Chemical Resistance and Integrity of Protective Material

Information regarding the integrity and limitations of personal protective clothing has been obtained from the manufacturer of each particular piece of equipment. PPE used for this project has been chosen with the following considerations:

- Chemical degradation i.e., Saranex, tyvek, neoprene gloves, etc.
- Protective clothing permeability, and chemical resistance.
- Effects of temperature extremes on personal protective clothing.

All personnel have been trained on the fact that no PPE is impermeable forever. Each piece of equipment provides protection from specific substances for a limited amount of time. When that time is reached, breakthrough will occur and the protective equipment must be replaced.

6.9 Standard Operating Procedures for Respiratory Protection Devices

The following subsections define standard operating procedures for air purifying respirators and self-contained breathing apparatus.



6.9.1 Cleaning and Disinfecting Self Contained Breathing Apparatus

Cleaning procedures for Self-Contained Breathing Apparatus (SCBA) face-pieces are identical to those for Ultratwin APRs. The back piece is cleaned with cleaning solution and a brush. Following cleaning, the face-piece is combined with the regulator and an operational check is performed.

6.9.2 SCBA Inspection & Checkout

SCBA's should be checked before each use and at the minimum once every month when not in active use. The directions of the manufacturer should be followed in the first place. Furthermore, the following general points should also be checked:

1. Check cylinder label for current hydrostatic test date.
2. Inspect cylinder for large dents or gouges.
3. Inspect cylinder gauge for damage.
4. Complete routine inspection of entire assembly.
5. Fill out the appropriate records with results and recommendations.

Pre-use Inspection: Perform immediately prior to donning or after cleaning.

1. Before proceeding, check that the:
 - High-pressure hose connector is tight on cylinder fitting.
 - By-pass valve is closed.
 - Mainline valve is closed.
 - Regulator outlet is not covered or obstructed.
2. Backpack and harness assembly:
 - Visually inspect straps for wear, damage, and completeness.
 - Check wear and function belt.
 - Check backplate and cylinder holder for damage.
3. Cylinder and high pressure hose assembly:
 - Check cylinder to assure that it is firmly attached to backplate.
 - Open cylinder valve; listen or feel for leakage around packing and hose connection.
 - Check high pressure hose for damage or leaks.
4. Check Regulator in accordance with manufacturer's instructions.
5. Face-piece and corrugated breathing hose:
 - Inspect for damage, serrations, and deteriorated rubber.
 - Inspect lens for damage and proper seal in face-piece.
 - Inspect exhalation valve for damage and dirt build-up.
 - Stretch breathing hose and carefully inspect for holes and deterioration.
 - Inspect connector for damage and presence of washer.
 - Perform negative pressure test with face-piece donned.



6. Prior to storage of SCBA follow all of manufacturer's instructions for storage and refill cylinder to full charge.

6.10 Procedures for Use of Personal Protective Clothing

Chemical Protective Clothing:

Determine that the clothing material is correct for the specified task at hand.

- Visually inspect for:
 - imperfect seams
 - non-uniform coatings
 - tears
 - malfunctioning
 - For Level A Clothing check for pinholes.

Flex products:

- observe for cracks
- observe for other signs of self-deterioration.

If the product has been used previously, inspect inside and out for signs of chemical attack:

- discoloration
- swelling
- stiffness

During the work task, periodically inspect for:

- Evidence of chemical attack such as discoloration, swelling, stiffening, and softening. Keep in mind, however, that chemical permeation can occur without any visible effects.
- Failure of items that require good seal.
- Tears
- Punctures
- Seam Discontinuities

Gloves:

Before use, visually inspect for:

- imperfect seams
- tears, abrasions
- non-uniform coating
- if possible, pressurize glove with air; listen for pin-hole leaks.

7.0 MEDICAL SURVEILLANCE REQUIREMENTS

This medical monitoring program is designed to track the physical condition of employees on a regular basis as well as survey pre-employment or baseline conditions prior to potential exposures from removal operations at the site.



7.1 Baseline Monitoring

Prior to being assigned to the site for removal operations, every employee must receive a pre-assignment or baseline physical. The contents of the physical are to be determined by the medical consultant, an occupational physician, retained to provide medical expertise for the removal operation. Per the NIOSH/OSHA/USCG/EPA's Occupational Safety & Health Guidance Manual for Hazardous Waste Site Activities, the minimum medical monitoring requirements for work at the Site area as follows:

- Complete medical and work histories.
- Physical examination.
- Pulmonary function tests (FVC and FEV1).
- EKG.
- Eye examination and visual acuity.
- Urinalysis.
- Blood chemistry, including hematology, serum analysis, and heavy metals toxicology.

The pre-assignment physical should categorize employees as fit-for-duty and able to wear respiratory protection.

7.2 Periodic Monitoring

In addition to a baseline physical, all employees require a periodic physical within the last 12 months unless the physician believes a shorter interval is appropriate. The employer's medical consultant should prescribe an adequate medical that fulfills OSHA 29 1910.120 requirements. The pre-assignment medical outlined above may be applicable.

7.3 Exposure/Injury/Medical Support

As a follow-up to an injury or possible exposure above established exposure limits, all employees are entitled to and encouraged to seek medical attention and physical testing. Depending upon the type of exposure, it is critical to perform follow-up testing within 24-48 hours. It will be up to the employer's medical consultant to advise the type of test required to accurately monitor for exposure effects.

7.4 Exit Physical

At termination of employment or reassignment to an activity or location that does not represent a risk of exposure to hazardous exposures, an employee shall require an exit physical. If his/her last physical was within the last 6 months, the advising medical consultant has the right to determine adequacy and necessity of exit exam.

8.0 SITE CONTROL MEASURES

The following section defines measures and procedures for maintaining site control. Site control is an essential component in the implementation of the site health and safety program.



8.1 Buddy System

During all activities implementation of a buddy system is mandatory. A buddy system requires at least two people who work as a team; each looking out for each other. For example, Level B operations generally require three people. All tasks to be performed during removal of waste at the site shall utilize the buddy system.

8.2 Site Communications Plan

Successful communications between field teams and contact with personnel in the support roles is essential. The following communications systems will be available during activities at the site.

- Hand Signals
- Telephone

<u>Signal</u>	<u>Definition</u>
Hands clutching throat	Out of air/cannot breath
Hands on top of head	Need assistance
Thumbs up	Ok/I am alright/I understand
Thumbs down	No/negative
Arms waving upright	Send backup support
Grip partners wrist	Exit area immediately

8.3 Nearest Medical Assistance

Medical assistance may be summoned by calling:

SEE ATTACHMENT 1

8.4 Safe Work Practices and Standing Orders

- No smoking, eating, or drinking in exclusion (hot) zone.
- No horseplay.
- Implement the communications system.
- Line of sight must be in position.
- Wear the appropriate level of protection as defined in the HASP.
- All personnel shall remove all contaminated protective equipment before leaving the contamination reduction zone.
- Personnel must thoroughly wash hands and arms before eating, drinking, smoking, or using the restroom.
- All personnel shall know the location of emergency eye wash equipment, fire extinguishers, emergency signaling devices (horns), and supervisory personnel who can provide first aid and additional safety equipment.
- Personnel should be familiar with and adhere to any client imposed safety requirements.



9.0 EMERGENCY RESPONSE/CONTINGENCY PLAN

This section describes contingencies and emergency planning procedures to be implemented at the each site. This plan is compatible with all Federal and most state and local disaster and emergency management plans.

9.1 Pre-Emergency Planning

All employees shall be trained and reminded of provisions of the emergency response plan, communication systems, and evacuation routes. The plan will be reviewed and revised if necessary, on a regular basis. This will ensure that the plan is adequate and consistent with prevailing site conditions.

9.2 Personnel Roles and Lines of Authority

The Project Manager has primary responsibility for responding to and correcting emergency situations. This includes taking appropriate measure to ensure the safety of site personnel and the public. Possible actions may involve evacuation of personnel from the site area. He/she is additionally responsible for ensuring that corrective measures have been implemented, appropriate authorities notified, and follow-up reports completed.

9.3 Emergency Alarm Procedures

In case of emergency, air horns will be located in the exclusion zone. All site personnel should immediately proceed through the contamination reduction zone to the pre-specified rally point.

9.4 Evacuation Routes/Procedures

In the event of an emergency that necessitates an evacuation of the site, the following alarm procedures will be implemented:

1. The worker first detecting the emergency condition will notify his or her immediate supervisor or sound the air horn.
2. The immediate supervisor will notify the Project Manager or client representative.
3. The Project Manager shall have authority to order an evacuation of part of the site or the entire site in consultation with client representative.
4. At the same time, the appropriate public emergency organization (e.g. Fire Department, Ambulance, etc. as listed in Attachment 1) should be notified as warranted. Notification shall be given to the appropriate government agency upon concurrence of client.

Upon notice of evacuation, all personnel will be expected to proceed via the contamination reduction zone to the closest exit with your buddy, and mobilize to the safe distance area associate with the evacuation route. Personnel will remain in that area until Re-entry is authorized or an authorized individual provides further instructions. Safe distances in the event of a major incident involving the release of a volatile toxic chemical shall be at least 100 yards upwind from the point of release. The Project Manager shall exercise professional judgment at the site during the time of the release to extend the distance if necessary.

The authority to order a public evacuation beyond the boundary of the site shall rest with the appropriate representatives of the governmental agencies.



9.5 Emergency Contact/Notification System

The following list provides names and telephone numbers for emergency contact personnel. In the event of a medical emergency, appropriate emergency organization. In the event of a fire or spill, the site supervisor will notify the appropriate local, state, and federal agencies as listed in Attachment 1.

Table 10.2 Public Emergency Organizations

See Attachment 1

9.6 Emergency Medical Treatment Procedures

Any person who becomes ill or injured in the exclusion zone must be decontaminated to the maximum extent possible. If the injury or illness is minor, full decontamination should be completed and first aid administered prior to transport. If the patient's condition is serious, at least partial decontamination should be completed (i.e., complete disrobing of the victim and redressing in clean overalls or wrapping in a blanket.) First aid should be administered while awaiting an ambulance or paramedics. All injuries and illnesses must immediately be reported to the Project Manager.

Any person being transported to a clinic or hospital for treatment should take with them information on the chemical(s) they have been exposed to at the site (i.e. MSDS, waste profile, etc.).

Any vehicle used to transport contaminated personnel will be decontaminated as necessary.

9.6.1 Nearest Medical Facility

Identification to, phone number of and direction to medical clinics or hospitals located closest to the project site are included as Attachment 2.

9.7 Fire or Explosion

In the event of a fire or explosion, the local fire department should be summoned immediately. Upon their arrival, the Project Manager or client representative will advise the fire commander of the location, nature, and identification of the hazardous materials on-site.

If it is safe to do so, site personnel may:

- Use firefighting equipment available on-site to control or extinguish the fire
- Remove or isolate flammable or other hazardous materials which may contribute to the fire.

9.8 Spill or Leaks

In the event of a spill or a leak, site personnel will:



- Inform their supervisor immediately
- Identify the material
- Locate the source of the spillage and stop the flow if it can be done safely
- Immediately initiate containment and recovery

9.9 Emergency Equipment/Facilities

The following emergency equipment shall be maintained on all project sites for all personnel to use:

- First Aid Kit
- Cellular Telephone
- Eye Wash
- Drums and overpacks
- Oil dry
- Absorbent pads
- Shovels and brooms

10.0 MINOR SPILL CONTAINMENT PROGRAM

Minor spills and releases (leaking bottles, drums, etc.) will be managed by designated personnel with coordination through the Project Manager. All absorbent material applied to contain and/or remedy the release will be swept and deposited into a drum for disposal at an appropriate facility. Designated personnel will handle all minor releases (leaking bottles, etc.) with coordination through the Project Manager. All absorbent material applied to contain and/or remedy the release will be swept and deposited into a drum for disposal at an appropriate facility. If possible, the leaking container may be moved to a more secure location for response. The procedures defined in this section comprise the spill containment program in place for activities at the site.

- All drums and containers used during the operations shall meet the appropriate DOT requirements for the waste that they will contain.
- Drums and containers shall be inspected and their integrity assured prior to being moved.
- Drums or containers that cannot be inspected before being moved because of storage conditions, shall be positioned in an accessible location and inspected prior to further handling using mechanical assistance as necessary.
- Employees involved in the drum or container operations shall be warned of the hazards associated with the containers.
- Where spills, leaks, or ruptures may occur, adequate quantities of spill containment equipment (absorbent pads, oil dry, etc.) will be stationed in the immediate area.
- Drums or containers that cannot be moved without failure, shall be emptied into a sound container by pumping, pouring or aspirating.
- Fire extinguishing equipment meeting 29 CFR part 1910. Subpart 1 shall be on hand and ready for use to control fires.



ATTACHMENT 1

Emergency Phone Numbers

In the event of a chemical spill, fire or explosion, the following agencies may be notified by mobile phone and will receive a written incident report as required by regulations.

EEI MANAGEMENT CONTACTS

Dan McCabe, President (513) 266-3800

NATIONAL HOTLINES

Office of Emergency Services	(800) 852-7550
National Response Center	(800) 424-8802
National Response EPA	(800) 223-0425
Poison Control Center	(800) 222-1222
Pesticide Hotline	(800) 858-7378
DOT HAZMAT Hotline	(800) 467-4922
RCRA Hotline	(800) 424-9346
CHEMTREC	(800) 424-9300
Ecology Spill Response Hotline (24 hr):	(509) 575-2490
Hazardous Materials Information Center	(202) 366-4488

EMERGENCY 911

STATE NUMBERS – TBD

LOCAL POLICE AND FIRE NUMBERS - TBD



ATTACHMENT 2

Maps to Emergency Medical Clinic and/or Hospital

Insert Name, Address, Phone Number and Directions to the emergency medical clinic or hospital nearest to the project site



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 Proposal
Part III: Household Hazardous Waste Proposal Price Sheet

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

Product category	Amount	Price per unit	Total cost
Antifreeze	2,550 lbs.	\$0.22	\$561.00
Flammable Solvents Liquids	3,600 lbs.	\$0.23	\$828.00
Lab Packs for Treatment/Incineration and Lab Pack Reactives	1,500 lbs.	\$1.28	\$1,920.00
NON-LATEX Paint Related Material (Processable 1 & 5 gallon containers, and non-processable pints and quarts)	75,000 lbs.	\$0.23	\$17,250.00
Mercury	20 lbs.	\$35.00	\$700.00
Fertilizers & Pesticides	10,000 lbs.	\$1.79	\$17,900.00
Waxes, Joint Compounds, Latex Adhesives	9,500 lbs.	\$0.75	\$7,125.00
Consumer Commodity Flammables	7,000 lbs.	\$1.28	\$8,960.00
Aerosol Cans	4,000 lbs.	\$1.05	\$4,200.00
Non-Motor Oil Used Oils	7,000 lbs.	\$0.22	\$1,540.00
Corrosives	2,000 lbs.	\$1.28	\$2,560.00
Fluorescent bulbs	12,000 lbs.	\$1.00	\$12,000.00
PCB Ballast	80 lbs.	\$3.05	\$244.00
Propane cylinders	2,300 lbs.	\$1.75	\$4,025.00
Total Set Up & Mobilization/Demobilization Cost	1	\$11,000.00	\$11,000.00
Total Miscellaneous Charges (please detail in below chart)	1	\$8,895.00	\$8,895.00
Total Labor Charges	1	\$0.00	\$0.00

Total Cost: \$99,708.00

Please list any additional miscellaneous charges in the below chart:

Item	Estimated amount	Price per item or pound	Total estimate
Isocyanate Cylinders	3	\$1,800 each	\$5,400.00
Freon Cylinders	6	\$25.00 each	\$150.00
Fire Extinguishers	50	\$15.00 each	\$750.00
Carbon Dioxide Cylinders	2	\$25.00 each	\$50.00
Helium Cylinders	10	\$25.00 each	\$250.00
Foaming Aerosols	200 lbs.	\$4.00 lb.	\$800.00
E-Cigarettes	10 lbs.	\$5.50lb./Min \$275	\$275.00
Reactives	40 lbs.	\$4.00lb./Min \$225	\$225.00
DWW	3 lbs.	\$11.50lb./Min \$225	\$225.00
Resins	140 lbs.	\$5.50 lb.	\$770.00

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

TABLE OF CONTENTS

- I. Purpose of the Affirmative Action Program**
- II. Required Utilization Analysis**
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 - A. Applicant Information
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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.

WORKFORCE ANALYSIS FORM

Name of Organization: Environmental Enterprises, Inc.

Categories	Total	White (Not Hispanic or Latino)		Hispanic or Latino		Black or African-American (Not Hispanic or Latino)		Native Hawaiian and Other Pacific Islander (Not Hispanic or Latino)		Asian (Not Hispanic or Latino)		American Indian or Alaskan Native (not Hispanic or Latino)		Two or more races (Not Hispanic or Latino)		Total	
		M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Administrators	2	2														2	
Professionals	4	3												1		4	
Superintendents																	
Supervisors	20	14	6													14	6
Foremen																	
Technicians	28	15	5			6				2						23	5
Protective Service																	
Para-Professionals	27	17		3		5								1	1	26	1
Office/Clerical	15	2	10		1		2									2	13
Skilled Craft	7	7														7	
Service/Maintenance	18	4	3	1	2	6								2		13	5
Total:	121	64	24	4	3	17	2			2				4	1	91	30

Prepared by: Barbara Curnutte, HR Director Date: 07 / 24 / 2025

(Name and Title)

Revised 2015-Dec-15

AFFIDAVIT

Comes the Affiant, Brian J. DePeel, and after being first duly sworn, states under penalty of perjury as follows:

1. His/her name is Brian J. DePeel and he/she is the individual submitting the proposal or is the authorized representative of Environmental Enterprises, Inc., the entity submitting the proposal (hereinafter referred to as "Proposer").

2. Proposer will pay all taxes and fees, which are owed to the Lexington-Fayette Urban County Government at the time the proposal is submitted, prior to award of the contract and will maintain a "current" status in regard to those taxes and fees during the life of the contract.

3. Proposer will obtain a Lexington-Fayette Urban County Government business license, if applicable, prior to award of the contract.

4. Proposer has authorized the Division of Central Purchasing to verify the above-mentioned information with the Division of Revenue and to disclose to the Urban County Council that taxes and/or fees are delinquent or that a business license has not been obtained.

5. Proposer has not knowingly violated any provision of the campaign finance laws of the Commonwealth of Kentucky within the past five (5) years and the award of a contract to the Proposer will not violate any provision of the campaign finance laws of the Commonwealth.

6. Proposer has not knowingly violated any provision of Chapter 25 of the Lexington-Fayette Urban County Government Code of Ordinances, known as "Ethics Act."

Continued on next page

7. Proposer acknowledges that "knowingly" for purposes of this Affidavit means, with respect to conduct or to circumstances described by a statute or ordinance defining an offense, that a person is aware or should have been aware that his conduct is of that nature or that the circumstance exists.

Further, Affiant sayeth naught.

STATE OF Ohio

COUNTY OF Hamilton

The foregoing instrument was subscribed, sworn to and acknowledged before me
by Brian J. DePeel on this the 18th day
of July, 2025.

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.

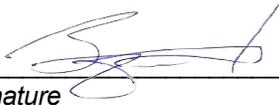
The Lexington-Fayette Urban County Government practices Equal Opportunity in recruiting, hiring and promoting. It is the Government's intent to affirmatively provide employment opportunities for those individuals who have previously not been allowed to enter into the mainstream of society. Because of 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



LEXINGTON

MINORITY BUSINESS ENTERPRISE PROGRAM

Sherita Miller, MPA, CPSD
Minority Business Enterprise Liaison
Division of Procurement
Lexington-Fayette Urban County Government
200 East Main Street
Lexington, KY 40507
smiller@lexingtonky.gov
859-258-3323

OUR MISSION: The mission of the Minority Business Enterprise Program (MBEP) is to facilitate the full participation of minority and women owned businesses in the procurement process and to promote economic inclusion as a business imperative essential to the long- term economic viability of Lexington-Fayette Urban County Government.

To that end the urban county council adopted and implemented Resolution 272-2024 – a Certified Minority and Women Business Enterprise seventeen percent (17%) minimum goal including minimum subgoals of five percent (5%) for Minority Business Enterprises (MBE) and a subgoal of twelve percent (12%) for Women Business Enterprises (WBE); a three (3%) minimum goal for Certified Veteran-Owned Small Businesses and/or Certified Service- Disabled Veteran Owned Businesses; and a goal of utilizing Disadvantaged Business Enterprises (DBE), where applicable, for government contracts.

The resolution states the following definitions shall be used for the purposes of reaching these goals:

Certified Disadvantaged Business Enterprise (DBE) – a business in which at least fifty-one percent (51%) is owned, managed and controlled by a person(s) who is socially and economically disadvantaged as define by 49 CFR subpart 26.

Certified Minority Business Enterprise (MBE) – a business in which at least fifty-one percent (51%) is owned, managed and controlled by an ethnic minority (i.e. Black American, Asian American, Hispanic American, Native American)

Certified Women Business Enterprise (WBE) – a business in which at least fifty-one percent (51%) is owned, managed and controlled by a woman.

Certified Veteran-Owned Small Business (VOSB) – a business in which at least fifty-one percent (51%) is owned, managed and controlled by a veteran who served on active duty with the U.S. Army, Air Force, Navy, Marines or Coast Guard.

Certified Service -Disabled Veteran Owned Small Business (SDVOSB) – a business in which at least fifty-one percent (51%) is owned, managed and controlled by a disabled veteran who served on active duty with the U.S. Army, Air Force, Navy, Marines or Coast Guard.

The term “Certified” shall mean the business is appropriately certified, licensed, verified, or validated by an organization or entity recognized by the Division of Procurement as having the appropriate credentials to make a determination as to the status of the business.

The following certifications are recognized and accepted by the MBEP:

Kentucky Transportation Cabinet (KYTC), Disadvantaged Business Enterprise (DBE)

Kentucky Minority and Women Business Enterprise (MWBE)

Women’s Business Enterprise National Council (WBENC)

National Women Business Owners Corporation (NWBOC)

National Minority Supplier Development Council (NMSDC)

Tri-State Minority Supplier Development Council (TSMSSDC)

U.S. Small Business Administration Veteran Small Business Certification (VetCert)

Kentucky Service- Disabled Veteran Owned Small Business (SDVOSB)

To comply with Resolution 272-2024, prime contractors, minority and women business enterprises, veteran owned small businesses, and service-disabled veteran owned small businesses must complete monthly contract compliance audits in the Diverse Business Management Compliance system, <https://lexingtonky.diversitycompliance.com/>

A list of organizations that certify and/or maintain lists of certified businesses (i.e. DBE, MBE, WBE, VOSB and/or SDVOSB) is available upon request by emailing, Sherita Miller, smiller@lexingtonky.gov.



LEXINGTON

LFUCG MWDBE PARTICIPATION FORM

Bid/RFP/Quote Reference # 21-2025

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 the Division of Procurement for approval immediately. **Failure to submit a completed form may cause rejection of the bid.**

MWBE Company, Name, Address, Phone, Email	DBE/MBE WBE/VOSB/SDVOSB	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 MDWBE and veteran 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

July 18, 2025
Date

Brian J. DePeel
Company Representative

Director, HHW Division
Title



LEXINGTON

LFUCG MWDBE SUBSTITUTION FORM

Bid/RFP/Quote Reference # 21-2025

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 the Division of Procurement 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. **Note: Form required if a subcontractor is being substituted on a contract.**

SUBSTITUTED DBE/MBE/WBE/VOSB Company Name, Address, Phone, Email	DBE/MBE/WBE/VOSB/SDVOSB 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

July 18, 2025
Date

Brian J. DePeel
Company Representative

Director, HHW Division
Title



LEXINGTON

DOCUMENTATION REQUIRED FOR GOOD FAITH EFFORTS AND OUTREACH PLANS

As affirmed in Resolution Number 272-2024, the Urban County Council has adopted an annual aspirational goal of utilizing at least seventeen percent (17%) of public funds spend from certain discretionary agreements with certified Minority Business Enterprises (MBEs) and certified Woman Business Enterprises (WBEs); utilizing at least three percent (3%) of public funds from certain discretionary agreements with Certified Veteran-Owned Small Business and Certified Service-Disabled Veteran-Owned Small Businesses (VOSBs); and utilizing Disadvantaged Business Enterprises (DBEs) where applicable. Bidders should make every effort to achieve these goals.

Therefore, as an element of the responsiveness of the bid, all Bidders are required to submit documentation of their good faith and outreach efforts to ensure all businesses, including small and disadvantaged businesses such as minority-, woman-, and veteran-owned businesses, have an equal opportunity to compete for and participate in the performance of any subcontracts resulting from this procurement. Examples of good faith and outreach efforts that satisfy this requirement to encourage the participation of, DBEs, MBEs, WBEs, VOSBs and/or SDVOSBs include:

1. 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, DBEs, MBEs, WBEs, VOSBs and/or SDVOSBs to participate.
2. Attended LFUCG Procurement Economic Inclusion Outreach event(s) within the past year to meet new small businesses, DBEs, MBEs, WBEs, VOSBs and/or SDVOSBs to partner with on LFUCG contracts and procurements.
3. Attended pre-bid/pre-proposal meetings that were scheduled by LFUCG to inform small businesses, DBEs, MBEs, WBEs, VOSBs and/or SDVOSBs of subcontracting opportunities.
4. Sponsored Economic Inclusion event to provide networking opportunities for prime contractors and small businesses, DBEs, MBEs, WBEs, VOSBs and/or SDVOSBs.
5. Requested a list of certified small, DBE, MBE, WBE, VOSB and/or SDVOSB subcontractors or suppliers from LFUCG and showed evidence of contacting the companies on the list(s).
6. Contacted organizations that work with small, DBE, MBE, WBE, and VOSB companies for assistance in finding certified DBEs, MBEs, WBEs, VOSB and/or SDVOSBs to work

on this project. Those contacted and their responses must be a part of the bidder's outreach efforts documentation.

7. Sent written notices, by certified mail, email, or facsimile, to qualified, certified small businesses, DBEs, MBEs, WBEs, VOSBs and/or SDVOSBs 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.
8. Followed up initial solicitations by contacting small businesses, DBEs, MBEs, WBEs, VOSBs and/or SDVOSBs via tailored communications to determine their level of interest.
9. Provided the interested small businesses, DBEs, MBEs, WBEs, VOSBs and/or SDVOSBs with adequate and timely information about the plans, specifications, and requirements of the contract.
10. Selected portions of the work to be performed by small businesses, DBEs, MBEs, WBEs, VOSBs and/or SDVOSBs in order to increase the likelihood of subcontracting participation. This includes, where appropriate, breaking out contract work items into economically feasible units to facilitate small, DBE, MBE, WBE, VOSB and/or SDVOSB participation, even when the prime contractor may otherwise perform these work items with its own workforce.
11. Negotiated in good faith with interested small businesses, DBEs, MBEs, WBEs, VOSBs and/or SDVOSBs, not rejecting them as unqualified without sound reasons based on a thorough investigation of their capabilities. Any rejection must be so noted in writing with a description as to why an agreement could not be reached.
12. Included documentation of quotations received from interested small businesses, DBEs, MBEs, WBEs, VOSBs and/or SDVOSBs that 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.
 - a. 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 small business', DBE's MBE's, WBE's, VOSB's and/or SDVOSB's quote. Nothing in this provision shall be construed to require the bidder to accept unreasonable quotes in order to satisfy the participation goals.
13. Made an effort to offer assistance to or refer interested small businesses, DBEs, MBEs, WBEs, VOSBs and/or SDVOSBs to obtain the necessary equipment, supplies, materials, insurance and/or bonding to satisfy the work requirements of the bid proposal.

14. Made efforts to expand the search for small businesses, DBEs, MBEs, WBEs, VOSBs and/or SDVOSBs beyond the usual geographic boundaries.
15. Other – any other evidence that the bidder submits that may demonstrate that the bidder has made reasonable efforts to include small, DBE, MBE, WBE, VOSB and/or SDVOSB participation.

Bidder must document, with specificity, each of the efforts it made to include small businesses, DBEs, MBEs, WBEs, VOSBs and/or SDVOSBs as subcontractors in the procurement, including the date on which each effort was made, the medium through which each effort was made, and the outcome of each effort.

Note: Failure to submit 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 review by the MBE Liaison. Documentation of Good Faith and Outreach Efforts must be submitted with the Bid, regardless of the proposed level of small, DBE, MBE, WBE, VOSB and/or SDVOSB participation in the procurement. If the Good Faith and Outreach Effort documentation is not submitted with the bid response, the bid may be rejected.

OUTREACH EFFORTS EVALUATION

Outreach efforts demonstrated by the bidder or respondent will be evaluated on a pass/fail basis.

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 MWDBE Participation Goals

Environmental Enterprises, Inc. (EEI) is a USEPA / OEPA Part B permitted Hazardous Waste Disposal Facility located in Cincinnati, Ohio. They were incorporated in the State of Ohio in 1976.

Because of the nature of their work including events such as one day HHW Collections, RFP #21-2025 known as "Household Hazardous Waste (HHW) Collection Events", 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.

ATTACHMENT A – SMALL AND DISADVANTAGED, MINORITY-, WOMEN-, AND VETERAN-OWNED BUSINESS OUTREACH PLAN

Proposer Name:	<u>Environmental Enterprises, Inc.</u>	Date:	<u>July 18, 2025</u>
Project Name:	<u>Household Hazardous Waste</u>	Project Number:	<u>21-2025</u>
Contact Name:	<u>Brian J. DePeel</u>	Telephone:	<u>800-850-3587</u>
Email:	<u>bdepeel@eeienv.com</u>		

The mission of the Minority Business Enterprise Program is to facilitate the full participation of disadvantaged businesses, minority-, women-, veteran-, and service-disabled veteran-owned businesses in the procurement process and to promote economic inclusion as a business imperative essential to the long-term economic viability of Lexington-Fayette Urban County Government.

To that end, small and disadvantaged businesses, including minority-, woman-, veteran-, and service-disabled veteran-owned businesses, must have an equal opportunity to be utilized in the performance of contracts with public funds spent from certain discretionary agreements. By submitting its offer, Bidder/Proposer certifies that it has taken, and if there are further opportunities will take, reasonable steps to ensure that small and disadvantaged businesses, including minority-, woman-, veteran-, and service-disabled veteran-owned businesses, are provided an equal opportunity to compete for and participate in the performance of any subcontracts resulting from this procurement.

The information submitted in response to this clause will not be considered in any scored evaluation. Failure to submit this form may cause the bid or proposal to be rejected.

Is the Bidder/ Proposer a certified firm? Yes No

If yes, indicate all certification type(s):

DBE MBE WBE SBE VOSB/SDVOSB

and supply a copy of the certificate and/or certification letter if not currently listed on the city's Minority Business Enterprise Program's (MBEP) certified list.

1. Include a list of firms that Bidder/ Proposer has had a contractual relationship with within the last two years that are minority-owned, woman-owned, veteran-owned or small businesses, regardless of their certification status.

2. Does Bidder/Proposer foresee any subcontracting opportunities for this procurement?

Yes No

If no, please explain why in the field below. Do not complete the rest of this form and submit this first page with your bid and/or proposal. See Attachment

If yes, please complete the following pages and submit all pages with your bid and/or proposal.

Describe the steps Bidder/Proposer took to solicit small and disadvantaged businesses, including MBEs, WBEs, VOSBs, and SDVOSBs, for subcontracting opportunities for this procurement.

3. Check the good faith and outreach efforts the Bidder/Proposer used to encourage the participation of small and disadvantaged businesses including, MBEs, WBEs, VOSBs and SDVOSBs:

- Bidder placed advertisements in search of prospective small businesses, DBEs, MBEs, WBEs, VOSBs and/or SDVOSBs for the solicitation.
- Bidder attended LFUCG Procurement Economic Inclusion Outreach event(s) within the past year.
- Bidder attended pre-bid and/or pre-proposal meetings for this solicitation.
- Bidder sponsored an Economic Inclusion Outreach event.
- Bidder requested a list of certified small, DBE, MBE, WBE, VOSB and/or SDVOSB subcontractors or suppliers from LFUCG.
- Bidder contacted organizations that work with small, DBE, MBE, WBE, VOSB and/or SDVOSB companies.
- Bidder sent written notices to certified small, DBE, MBE, WBE, VOSB and SDVOSB businesses.
- Bidder followed up to initial solicitations with interested small, DBE, MBE, WBE, VOSB and/or SDVOSB.
- Bidder provided small, DBE, MBE, WBE, VOSB and/or SDVOSB businesses interested in performing the solicited work with prompt access to the plans, specifications, scope of work, and requirements of the solicitation.
- Bidder made efforts to segment portions of the work to be performed by small businesses, DBEs, MBEs, WBEs, VOSBs and/or SDVOSBs, including dividing sub-bid/partnership opportunities into economically feasible units/parcels, to facilitate participation.

- Bidder negotiated in good faith with interested small, DBE, MBE, WBE, VOSB and/or SDVOSB businesses.
- Bidder provided adequate rationale for rejecting any small business', DBEs, MBEs, WBEs, VOSBs or SDVOSBs for lack of qualifications.
- Bidder offered assistance in obtaining bonding, insurance, financial, equipment, or other resources to small businesses, DBEs, MBEs, WBEs, VOSBs and/or SDVOSBs, in an effort to assist them in meeting project requirements.
- Bidder made efforts to expand the search for small businesses, DBEs MBEs, WBEs, VOSBs and/or SDVOSBs beyond the usual geographic boundaries.
- Bidder made other reasonable efforts to include small businesses, DBEs, MBEs, WBEs, VOSBs and/or SDVOSBs participation.

4. Bidder/Proposer must include documentation, including the date each effort was made, the medium through which each effort was made, and the outcome of each effort with this form, regardless of the level of small, DBE, MBE, WBE, VOSB and/or SDVOSB participation. Examples of required documentation include copies of email communications, copies of newspaper advertisements, or copies of quotations received from interested small businesses, DBEs, MBEs, WBEs, VOSBs or SDVOSBs.

 Click or tap here to enter text. 

For detailed information regarding outreach efforts that satisfy the MBE Program's requirements, please see "Documentation Required for Good Faith Efforts and Outreach Plans" page.

Note: The Bidder/Proposer must be willing to report the identity of each subcontractor and the value of each subcontract to MBEP if awarded a contract from this procurement.

Failure to submit the documentation requested may be cause for rejection of the bid. Bidders may include any other documentation deemed relevant to this requirement, which is subject to review by the MBE Liaison. Documentation of Good Faith and Outreach Efforts must be submitted with the bid, regardless of the proposed level of SBEs, DBEs, MBEs, WBEs, VOSBs and/or SDVOSBs participation in the procurement. If the Good Faith and Outreach Effort Form and associated documentation is not submitted with the bid response, the bid may be rejected.

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
July 18, 2025
Date

Brian J. DePeel
Company Representative
Director, HHW Division
Title

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;

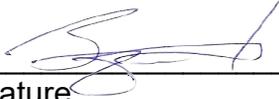
- (c) Late payment or nonpayment of bills for labor, materials, supplies, or equipment furnished in connection with a contract for construction services as evidenced by mechanics' liens filed pursuant to the provisions of KRS Chapter 376, or letters of indebtedness received from creditors by the purchasing 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

July 18, 2025

Date