



6100 Carillon Point  
Kirkland, WA 98033  
425-889-3498  
425-889-3746  
www.vopakusa.com

2002

NC R000005066

**ANNUAL CERTIFICATION OF  
HAZARDOUS WASTE MINIMIZATION PROGRAM**

Vopak USA Inc. certifies that it has a program in place to reduce the volume and toxicity of the hazardous waste generated at its facilities. The program is designed to minimize generation of hazardous waste to the degree determined to be economically practicable. Vopak USA Inc. uses currently available methods of treatment and/or disposal for hazardous wastes which minimizes the present and future threat to human health and the environment. These methods are in the treatment standards and technologies contained in the RCRA hazardous waste regulations, or are the best demonstrated available technologies (BDAT).

L. Dwight Landry  
Vice President, Operations & Environmental Affairs  
Vopak USA Inc.

January 28, 2002  
Date

## WASTE MINIMIZATION PROGRAM

Vopak USA Inc. is a wholly owned subsidiary of Royal Vopak Company, based in Rotterdam, The Netherlands. This facility is operated as a chemical repackaging and distribution warehouse (Standard Industrial Classification Code is 5169).

Vopak USA Inc. is a distributor of industrial chemicals and has been in the business for over 136 years. We operate over 100 facilities nationwide. Our customers represent a wide range of industries, including food and pharmaceutical producers, the electronics industry, paints and coating manufacturers, plastics manufacturers, cleaning industries, clothing manufacturers, cosmetics, compounding, and many other businesses producing goods and services each of us use every day.

As a distributor, Vopak USA Inc. does not manufacture the chemicals it distributes. Our product is service. Vopak USA Inc. has the knowledge and resources to distribute chemicals efficiently and safely. We also assist our customers with technical, regulatory, and health and safety issues, including waste minimization technologies. Vopak USA Inc. also offers ChemCare®, a hazardous waste management service to its customers. ChemCare® functions as a reverse distribution system, taking chemical wastes generated by our customers to RCRA permitted recycling, treatment, and disposal facilities.

Wastes are generated at this facility when product is damaged, accidentally spilled, or its shelf-life is exceeded and it is no longer suitable for sale. Wastes are also generated during chemical repackaging operations when small amounts of material are used to "flush the lines" of contaminants prior to beginning the repackaging process. Vopak USA Inc. also is authorized to temporarily store containerized hazardous waste generated by its customers.

It is the policy and practice of Vopak USA Inc. to manage chemicals in an environmentally responsible manner, including the minimization of chemical wastes. Vopak USA Inc. is an active participant in the National Association of Chemical Distributors (NACD) Responsible Distribution program. One of the objectives of Responsible Distribution is waste minimization.

RCRA hazardous waste regulations require that Vopak USA Inc. have a program in place to reduce the volume and toxicity of hazardous waste generated from operations on-site, and hazardous wastes generated off-site and received into storage. The regulations are in 40 CFR Parts 262.41 and 264.73. These regulations require an annual certification describing the changes in volume and toxicity of waste actually achieved from previous years.

The following Vopak USA Inc. waste minimization program applies to all wastes managed at the facility, including wastes generated from operations on-site and waste received into storage:

1. Personnel have been trained in procedures to reduce the creation of waste resulting from poor operational practices, such as damage during warehousing.
2. A standard operating practice of rotating stock has been established to keep inventory from exceeding its recommended shelf-life.
3. A standard operating practice has been established to maintain inventories at an appropriate level to only service our customer's needs, reducing the potential for product to exceed its recommended shelf-life.
4. A standard operating practice has been established to identify excess product inventories and to sell products nearing their shelf-life dates.
5. A standard operating practice has been established which requires us to contact manufacturers of the products we warehouse to recycle out-of-date and damaged chemicals.
6. A standard operating practice of equipment dedication (as feasible) reduces the need to create line flush waste.
7. A standard operating practice has been established to reduce the amount of material used when flushing the lines before repackaging.
8. A standard operating practice has been established to develop customers that can beneficially use line flush as product.
9. A program for introducing new and innovative technology is being pursued to develop equipment and operating practices which will reduce the amount of waste created (OSM 6.20).
10. A management team has been formed to develop methods of reducing waste generated.