

Hazardous Waste Section
File Room Document Transmittal Sheet

Your Name: Anthony Foster-055
EPA ID: NCD077840148
Facility Name: Safety-Kleen Archdale
Document Group: Inspection/Investigation (I)
Document Type: Compliance Evaluation Inspection (CEI)
Description: TSDF
Date of Doc: 2/8/2016
Author of Doc: Anthony Foster

File Room Use Only

Date Recieved by File Room:

Date Scanned:

Month	Day	Year

NCD077840148

Scanner's Initials:

COMMERCIAL FACILITY REPORT
Resident Inspector Program
Waste Management Division
Department of Environmental Quality

DOCKET #: N/A

INSPECTION AND EVALUATION

EPA ID #: NCD 077840148		FACILITY NAME: Safety-Kleen	
ADDRESS: 6182 Old Mendenhall Rd.		CITY: Archdale, NC	
NEW <input checked="" type="checkbox"/>	UPDATE <input type="checkbox"/>	DATE(S) OF INSPECTION: 2/8/16	STAFF ID #: 55

EVALUATION TYPE: 1	1 = Compliance Evaluation (CEI for HWS) 2 = Sampling / Monitoring. 3 = Record Review (Logs, Annual Report) 4 = Air / Water Permit Requirements 5 = Reinspection (Compliance Schedule). 6 = Cont. Plan / Prev & Prep (Safety/OSHA)	7 = Part B Permit 8 = Manifests / LDRs 9 = General 10 = Waste Analysis Plan 11 = Complaint Investigation 12 = BIF 80 = Informal Meeting
JOINT / SUB <input type="checkbox"/>		
OFF SHIFT <input type="checkbox"/>		
DURATION (Hrs) 4.0		

REINSPECTION ONLY: Date of Initial Evaluation: n/a

Original Docket #: n/a

CLASS OF VIOLATION / DEFICIENCY

Class	O2/H2O	Safety/CP	FIN	Part B	Comp Sch	Man	LB	OT	W Mgt	BIF
SNC	O	O	O	O		O		O	O	
SV	O	O	O	O		O		O	O	

SNC = Significant Noncomplier

SV = Secondary Violation

Acceptable Codes

RS	XS	XS	XS	XS	XS	XS	XS	XS	XS	XS
ZO	ZO	ZO	ZO	ZO	ZO	ZO	ZO	ZO	ZO	ZO
H	HR	HI*	H	H	H	H	H	H	H	H

Key:

X = Violation(s)

O = No Violation

R = Referral to DEM or OSHA

H = HPV Violations Present

Z = Pending / Deficiency

S = Same Violation (repeated)

I = No Insurance Only

* = SNC Only

ENFORCEMENT ACTIONS: Area of Violation(s) = CP, PP, FI, PB, CS, MA, LB, OT, WM, BIF

CLASS	AREA OF VIOLATION	TYPE CODE	DATE ACTION TAKEN	COMPLIANCE DATES		PENALTY ASSES. COLL.		RESP AG
				SCHED.	ACTUAL			

Codes for Types 01 = Warning Letter

10 = Informal

of Enforcement

02 = Ticket NOV

11 = Filed Civil Action

Actions:

03 = Draft NOV

04 = Admin. Complaint

05 = Final Admin. Order

12 = Filed Criminal Action

13 = Civil Referral to AG

90 = Hearing

Comments / Recommendations: _____

NORTH CAROLINA
Department of Environmental
Quality

RCRA INSPECTION REPORT

- 1) **Facility Name:** Safety-Kleen Systems, Inc
ID Number: NCD 077840148
Type of facility: Permitted Commercial Storage Facility
Ownership: Safety-Kleen Systems, Inc
Contact: Phil Curry
Phone number: (336) 861-4149
Facility /address 6182 Old Mendenhall Rd
City, state, zip: Archdale, North Carolina 27263
- 2) **Survey Participants:** Calvin Hill - Material Handler, Safety Kleen
Phil Curry – Manager, Safety Kleen
Anthony Foster - NC DEQ Resident Inspector
- 3) **Date of Inspection:** February 8, 2016 **Time:** 11:00 AM – 4:00 PM
- 4) **Purpose of Inspection:** Evaluation of compliance with 40 CFR 262, 263, 264, 268, 279 and special permit conditions
- 5) **Facility Description:**

Processes: Drums of spent mineral spirits are poured into dumpsters, coarsely filtered, and bulked into tanks for onsite storage. The drums are then rinsed and scrubbed with mineral spirits, and reused as a product drum by filling it with clean mineral spirits and shipped back out to the customer. The solids caught in the coarse filter are collected in a drum and managed onsite as generated hazardous waste. The spent liquid mineral spirits that is collected in the tank farm is managed as hazardous waste, shipped out by tanker on a weekly basis (typically to Lexington, SC), where it is distilled and recovered to be used as clean product.

In addition, the facility also handles and stores dry cleaning wastes, dry cleaning filters, paint wastes, various solvent cleaners (such as brake cleaner and immersion cleaner), and used oil and used antifreeze. The facility also handles various waste solvents as transfer wastes. These drums are accumulated in a transfer area inside containment at the facility and are onsite for 10 days or less.

RCRA INSPECTION REPORT

(Continued)

Type Waste: Characteristic wastes - D001
Toxicity characteristic wastes - D004-D011, D018-D019, D021-D030,
D032- D043
Waste from nonspecific sources - F002, F003, and F005

Transporters: Safety-Kleen Systems - ILD 984-908-202
Safety-Kleen Systems - TXR 000-081-205
(All inbound shipments; all outbound shipments except used oil)

TSD's: Safety-Kleen Sys. (Lexington, SC) - SCD 077-995-488
Safety-Kleen Sys. (Smithfield, KY) - KYD 053-348-108
Safety-Kleen Sys. (Linden, NJ) - NJD 002-182-897 (Transfer waste)
Safety-Kleen Sys. (Denton, TX) - TXD 077-603-371
Clean Harbors, LLC. (Hebron, OH) - OHD 980-587-364
Safety-Kleen Sys. (Dolton, IL) - ILD 980-613-913
Safety-Kleen Sys. (Cranston, RI) - RID 084-802-842

Accumulation Areas: Return / Fill station on dock.

Storage Areas: 1 Tank farm - 5 x 20,000 gallon tanks
1 waste mineral spirits; 1 product mineral spirits, 3 used oil
North West Warehouse- 13,140 gallons
Service Warehouse - 5,760 gallons
Accumulation Center- 13,140 gallons

6) **Waste Minimization:**

Plan on file, and available for review.

Facility Name: Safety-Kleen Systems - Archdale
EPA ID No: NCD 077840148

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RCRA INSPECTION REPORT
(Continued)

7) **Site Deficiencies:**

Docket No: NA

None

8) **Recommendations / Requirements:**

1. Be sure First Aid Kits are kept stocked and all medications in date.


Inspector / Date


Facility Contact / Date

Safety-Kleen Systems Inc.
Archdale, NC
Randolph County
NCD 077 840 148

TSDF INSPECTION FORM – PART 264
SUPPLEMENTAL CHECKLIST FOR FACILITY SPECIFIC CONDITIONS

1. Authorized Waste (Permit Condition II.A.)

✓ The Permittee is authorized to store the following hazardous wastes or categories of hazardous waste in accordance with the conditions of this permit, as follows:

Spent mineral spirits:	D001 and codes in note
Spent immersion cleaner solvent:	Codes listed in note
Paint spray gun cleaner:	Codes listed in note
Paint waste:	D001, F003, F005 and codes listed in note
Dry cleaning waste:	D001 or F002 and codes listed in note
Storage Tank bottom sludge:	D001 and codes in note
Drum Washer bottom sediment:	D001 and codes in note

Note: D004-D011, D018, D019, D021-D030, D032-D043

2. General Waste Analysis (Permit Condition II.D.)

✓ Documentation that the waste analysis plan is followed as outlined in Part C of the Permit Application. All waste streams must be analyzed per the annual waste characteristics analysis.

The required records are as follows:

- Prior to waste acceptance each customer must complete a "Safety Kleen Waste Acceptance Form" (Appendix C-3 of the Permit Application).
- "Safety Kleen Waste Acceptance Form" (Appendix C-3 of the Permit Application) must be reviewed annually and updated if necessary.
- Each customer must sign a Safety-Kleen service document each time a machine is serviced (Section C-2 of the Permit Application).

Shipments from off-site must be fingerprinted as follows:

Spent Parts Washer Solvent

Tier 1 – Volume in container, color/appearance, odor (if noted), core sampling, and pH of aqueous layer

Tier 2 (if necessary) – Specific gravity and flashpoint/flame color

Tier 3 (if necessary) – Halogenated Organic Volatiles and Volatile Organic Compounds

Spent Immersion Cleaner Waste

Tier 1 – Volume in container, color/appearance, odor (if noted), core sampling, and pH of aqueous layer

Tier 2 (if necessary) – Specific gravity and flashpoint/flame color

Tier 3 (if necessary) – Halogenated Organic Volatiles and Volatile Organic Compounds

Spent Paint Gun Cleaner Waste

Tier 1 – Appearance and volume in container

Tier 2 (if necessary) – Specific gravity and flashpoint/flame color

Tier 3 (if necessary) – Halogenated Organic Volatiles

Paint Waste

Tier 1 – Appearance

Tier 2 (if necessary) – Flashpoint, flame color and specific gravity (free liquids only)

Tier 3 (if necessary) – Halogenated Organic Volatiles

Dry Cleaner Wastes

Containers are not opened

3. General Inspection Requirements (Permit Condition II.F)



Documentation that all container and tank storage and treatment area are inspected as specified in Section F-2 of the Permit Application

4. Storage in Containers (Permit Condition III.)

Maximum container storage



Container Storage (Spent) – 4,110 gallons



Class 1B – 4,480 gallons

Container storage in DOT approved containers

5. Management of Containers



In container storage area, drums will be stacked one high per pallet and no more than two (2) pallets high. Containers in the drum washer/dumpster area will be

stacked no more than two (2) high and not require a pallet.

Drums stacked no more than two (2) high, with the exception of 5-gallon pails which can be stacked to a height not to exceed four (4) high; and waste containers 30-gallons or less containing spent dry cleaning waste, which can be stacked two (2) high per pallet and two (2) pallets high providing that the complete pallet consists of drums secured to each other and to the pallet by stretch wrapping or stacking.

6. Minimum Aisle Space (Permit Condition III.E.)

Minimum aisle space between rows of containers is two (2) feet.

7. Storage in Tank (Permit Condition IV.)

Maximum capacity in tank – 15,000 gallons
 Maximum capacity in each dumpster – 375 gallons (750 gallons total)

8. Documents to be Maintained at Facility Site (Permit Condition I.F.) ***

Waste analysis plan (Section C)
 Personnel training documents and records (Section H)
 Contingency plan (Section G)
 Closure plan (Section I)
 Operating record (Section C, D, F, G, H, BB, CC of the permit application.)
 Inspection schedules (Section F-1 of the application)

*** Sections refer to sections in the Permit Application – attachment to the permit

9. Session Law SL-2007-107 Requirements for commercial TSDF's

Annual notification (Section 1.5(a))
 Contingency planning (Section 1.2(a))
 Off-site information requirement (Section 1.3(a))
 Permit mid-point notification to public by mail (Section (1.4(a))
 24 hour security (Section 1.6(a))
 On-site wind monitors (Section 1.9(a))

10. Corrective Action

Groundwater monitoring wells MW-1, MW-2, MW-3, MW-4, and MW-5 (Note MW-4 is off-site)

C Documentation (c)

SUBPART C – PREPAREDNESS AND PREVENTION

7. Required Equipment (264.32)
 - C Communication / alarm system (a)
 - C Telephone or two-way radio (b)
 - C Fire, spill, and decontamination equipment (c)
 - C Adequate pressure and volume of water/foam equipment (d)
8. Testing and Maintenance of Equipment (264.33)
 - C As required
9. Access to Communications or Alarm System (264.34)
 - C Immediate (a)(b)
10. Required Aisle Space (264.35)
 - C Per permit condition
11. Arrangement with Local Authorities (264.37)
 - C Of changes with wastes characteristics (a)
 - C Documentation of refusal (b)

SUBPART D - CONTINGENCY PLAN AND EMERGENCY PROCEDURES

12. Amendment of Contingency Plan (264.54)
 - C Permit revision (a)
 - N/A Emergency failure (b)
 - C Facility design change (i.e. construction operation) (c)
 - C Coordinators change (d)
 - C Equipment change (e)
13. Emergency Coordinator (264.55)
 - C On call
 - C Authority to commit
14. Emergency Procedures (264.56)
 - N/A Activation of alarm system (a)(1)
 - N/A Notification to State / Local agencies of discharge (a)(2), (d)(1)(2)
 - N/A Hazard assessment (c)
15. Emergency Procedures (264.56) (*Continued*)
 - N/A Reasonable prevention measures (e)
 - N/A Monitor for leaks, pressure buildup, etc. (f)
 - N/A Proper management of recovered waste, contaminated soil or surface water (g)
 - N/A Compatibility with contaminated areas (h)(1)
 - N/A Emergency equipment cleaned (h)(2)
 - N/A Notification of compliance (i)
 - N/A Written report (15 days)/operating record notation (j)

SUBPART E - MANIFEST SYSTEM. RECORDKEEPING

15. Use of Manifest System (264.71)
- Sign, date (a)(1)
 - Note-discrepancies (a)(2)
 - Copy to transporter (a)(3)
 - Copy to generator (30 days) (a)(4)
 - TSDF copy (a)(5)
 - Rail or water transporter (b)(1)(2)(3)(4)(5)
 - Generator compliance (c)
16. Manifest Discrepancies (264.72)
- Bulk discrepancies (a)(1)
 - Batch discrepancies (a)(2)
 - Written report, if required (b)
17. Operating Record (264.73)
- Written (a)
 - Quantity, handling methods, dates (b)(1)
 - Location / quantity with cross reference (b)(2)
 - Waste analysis (b)(3)
 - Incident reports (b)(4)
 - Inspection record (b)(5)
 - Monitoring testin results (for incinerators) (b)(9)
 - Notice to generators (b)(7)
 - Closure / post closure cost (b)(8)
18. Availability, Retention, and Disposition of Records (264.74)
- Access to records (a)
 - Retention (b)
 - Records submitted (c)
19. Annual Report (264.75)
- Submit by March 1 (a)(b)(c)(d)(e)(f)(g)(h)
20. Un-manifested Waste Report (264.76)
- Within 15 days (a)(b)(c)(d)(e)(f)(g)
21. Additional Reports (264.77)
- Section 264.56(j), report (a)
 - Facility closure (c)

SUBPART G - CLOSURE AND POST-CLOSURE

22. Closure Plan; Amendment of Plan (264.112)
- Written (a)
 - Inventory modification (a)(2)
 - Amendment (b)
 - 180 day notice (c)

23. Disposal or Decontamination of Equipment (264.114)
N/A Equipment disposal / decontamination

24. Post-Closure Plan; Amendment of Plan (264.118)
C Written (a)
C Amendment / modification (b)(c)

SUBPART H - FINANCIAL REQUIREMENTS

25. Cost Estimate for Closure (264.142)
C Written (a)
C Anniversary adjustment (b)
C Change adjustment (c)
C Available for inspection (d)

26. Financial Assurance for Closure (264.143)
C Yes
Specify form ___ Certificate of Insurance _____

27. Estimate for Post-Closure Care (264.144.)
C Written (a)
C Anniversary adjustment (b)
C Change adjustment (c)
C Available for inspection (d)

28. Financial Assurance for Post-Closure (264.145)
C Yes
Specify form ___ Certificate of Insurance _____

29. Liability Requirements (264.147)
C Sudden occurrences (a)
C Non-sudden occurrences (b)

30. Incapacity of Owners or Operators, Guarantors or Financial Institutions (264.148)
N/A Compliance (a)(b)

Regulatory Citation/Description	RCRA Checklist Item	Potential Violation
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264/265.16(a)(1)
Outline of Personnel Training Program

Is there an outline of the introductory training program to prepare personnel to operate or maintain the facility in a safe manner? (Attach copy of outline or summarize below)

Yes No

See Permit Application.

Is there an outline of the review training program to prepare personnel to operate or maintain the facility in a safe manner? (Attach copy of outline or summarize below)

Yes No

See Permit Application.

Does the outline describe how the training will be designed to meet actual job tasks?

Yes No

Is on-the-job training used to meet this requirement?

Yes No

264/265.16(d)(1)
264/265.16(d)(2)
Job Title/Job Description

Is a job title provided for each employee whose position at the facility is related to hazardous waste management?

Yes No

Is a job description provided for each employee whose position at the facility is related to hazardous waste management?

Yes No

Regulatory Citation/Description	RCRA Checklist Item	Yes	No	Potential Violation
264/265.16(c) and (d)(3) Training Content, Frequency, and Techniques	Is the personnel training program strictly classroom instruction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	—
	Is the personnel training program strictly on-the-job training?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	—
	Does the training program combine classroom instruction and on-the-job training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	—
	Is the introductory personnel training program offered at least semiannually?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	—
	Is an annual refresher course required for personnel whose positions at the facility are related to hazardous waste management?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	—
264/265.16(a)(2) Training Director	Is the training program directed by a person trained in hazardous waste management? (Summarize qualifications below)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	—
<i>See Attachment.</i>				
264/265.16(a)(2) Relevance of Training to Job Position	Are facility personnel instructed in hazardous waste management procedures (including contingency plan implementation) relevant to their positions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	—

Regulatory Citation/Description	RCRA Checklist Item		Potential Violation
264/265.16(a)(3) Training and Emergency Response	Does the training program include the following emergency response procedures?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	—
	• Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	—
	• Key parameters for automatic waste feed cut-off systems?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	—
	• Procedures for utilizing communications or alarm systems?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	—
	• Directions for responding to fires or explosions?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	—
	• Procedures for conducting shutdown operations?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	—
264/265.16(b),(d)(4) and (3) Implementation of Training Program	Are all facility personnel trained within six months of their employment or assignment to the facility or transfer to a new position? Is this verified by employees?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	— —
	Are facility personnel allowed to work unsupervised before their training program has been completed? Is this verified by employees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	— —
	Are records maintained which document that the required training has been given to and completed by facility personnel? (Summarize below)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	—
	Is this verified by employees?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	—

Regulatory Citation/Description	RCRA Checklist Item	Yes	No	Potential Violation
264/265.33 Testing and Maintenance of Equipment	Does the owner/operator test and maintain (as necessary to assure its proper operation in time of emergency) the following equipment:			
	• All communications or alarm systems?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	___
	• Fire protection equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	___
	• Spill control equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	___
264/265.15 General Inspection Requirements	Does the owner/operator maintain a written schedule at the facility for the inspection of:			
	• Monitoring equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	___
	• Safety and emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	___
	• Security devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	___
	• Operating and structural equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	___
	Does the schedule identify the types of problems to look for?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	___
	Is the frequency of inspection based on the possible deterioration of equipment and the probability of incident?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	___
	Are areas subject to spills, such as loading and unloading areas, inspected daily?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	___
Does the owner/operator maintain an inspection log?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	___	

Regulatory Citation/Description

RCRA Checklist Item

Potential Violation

If yes, does the log include:

- Date and time of inspection? Yes No
- Name of inspector? Yes No
- Notations of observations? Yes No
- Date and nature of repairs or remedial actions? Yes No

Have any malfunctions or other problems not been remedied? (Summarize below) Yes No

264/265.35
Required Aisle Space

Does the facility maintain aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? Yes No

If aisle space is not maintained, has the owner/operator demonstrated to the Regional Administrator that the space is not needed? Yes No *N/A*

Regulatory Citation/Description	RCRA Checklist Item	Potential Violation
264/265.32 Equipment Requirements	Is the facility equipped with the following?	
	• An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>
	• A device such as a telephone (immediately available) or handheld two-way radio capable of summoning emergency assistance from police, fire, or state or local emergency response teams?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>
	• Portable fire extinguishers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>
	• Fire control equipment (including special extinguishing equipment such as foam, inert gas, or dry chemical)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>
	• Spill control equipment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>
	• Decontamination equipment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>
	• Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>
264/265.17(a) and (b) Requirements for Ignitable, Reactive, or Incompatible Wastes	Does the facility handle ignitable or reactive waste?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>
	If yes:	
	Does the owner/operator take the following precautions to prevent accidental ignition or reaction of wastes?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>

Regulatory Cita-	RCRA Checklist Item	Potential Violation
	<ul style="list-style-type: none"> Separate and protect ignitable or reactive wastes from sources of ignition or reaction (open flames, smoking, cutting, welding, hot surfaces, frictional heat, static electrical or mechanical sparks, spontaneous ignition, and radiant heat)? 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>
	<ul style="list-style-type: none"> Does the owner/operator confine smoking and open flames to specially designated locations, while ignitable or reactive waste is being handled? 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>
	<ul style="list-style-type: none"> Are "No Smoking" signs placed conspicuously wherever there is a hazard from ignitable or reactive waste? 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>
	<p>Does the owner/operator have procedures in place to prevent accidental ignition or reaction of wastes? (Summarize below)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>
<p>264/265.50 through 265.56 Contingency Plan</p>	<p>Does the owner/operator have a Contingency Plan or a Spill Prevention Control and Counter measures (SPCC) Plan, or some other emergency plan that is amended for hazardous waste management?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>
	<p>Is a copy maintained at the facility?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>
	<p>Has a copy been submitted to all local police and fire departments, hospitals, and State and local emergency response teams?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>

Regulatory Citation/Description

RCRA Checklist Item

Potential Violation

Does the plan describe the control procedures taken in the event of a fire, explosion or release?

Yes No

Does the plan describe how and when it will be implemented?

Yes No

Does the plan describe arrangements agreed to by local police and fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services?

Yes No

Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

Yes No

Is one person named as the primary coordinator?

Yes No

Does the coordinator have the authority to commit the resources to carry out the emergency plan?

Yes No

Does the plan physically describe and identify the location of all emergency equipment at the facility?

Yes No

Does the plan include provisions to ensure that the equipment is cleaned and fit for its intended use before operations are resumed?

Yes No

Does the plan include an evacuation plan for facility personnel?

Yes No

Does the plan describe:

• Signal(s) to be used to begin evacuation?

Yes No

• Evacuation routes?

Yes No

Regulatory Citation/Description	RCRA Checklist Item	Potential Violation
	Does the plan describe the methodology for immediate notification of:	
	• Facility personnel?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	• State or local agencies with designated response roles?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Does the plan include procedures for identification of released materials?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Does the plan include procedures/criteria to assess possible hazards to human health and the environment that may result from the release fire or explosion?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Does the plan describe all reasonable measures necessary to ensure that fires, explosions, or releases do not occur, reoccur or spread to other hazardous waste at the facility?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Does the plan describe procedures to monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes or other equipment if the facility stops operation in response to a fire, explosion or release?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
264/265.37 Necessary Agreements with Local Authorities	Has the owner operator made the following arrangements:	
	• Familiarize police, fire departments, and emergency response teams with the layout of the facility and associated hazards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	• Designated one police and fire department with primary emergency authority when more than one might respond?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	• Agreements with State emergency response teams, contracts and equipment supplies?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Regulatory Citation/Description	RCRA Checklist Item	Yes No	Potential Violation
	<ul style="list-style-type: none"> Familiarize local hospitals with the properties of waste handled at the facility and the types of injuries or illness that could result? Where authorities decline to enter into such arrangements, has the owner/operator documented the refusal? 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	—
Subpart I - Containers 264/265.173(a),(b) Management of Containers	Check here if containers are present at the facility. If no, go to Subpart J.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	ABF
	Are containers holding hazardous waste closed during storage, except when waste is added or removed? (If no, attach narrative)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	—
	Does the facility have procedures to ensure that containers holding hazardous waste are not opened, handled, or stored in a manner that may rupture the container or cause it to leak?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	—
264/265.177 Special Requirements for Incompatible Wastes	Does the facility have procedures to ensure that incompatible wastes are not placed in the same containers or in unwashed containers that previously held incompatible waste?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	—
	Are storage containers holding a hazardous waste that is incompatible with waste or other materials stored in nearby containers, piles, open tanks or surface impoundments, separated from the other materials or protected from them by means of a dike, berm, wall or other device?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	—

Regulatory Citation/Description	RCRA Checklist Item	Yes	No	Potential Violation
Subpart J - Tanks 264/265.198 (a)(1 and 2) Special Requirements for Ignitable or Reactive Wastes	Are ignitable or reactive wastes treated, rendered, or mixed before or immediately after placement in the tank so that:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	—
	<ul style="list-style-type: none"> The resulting mixture no longer meets the definition of an ignitable or reactive waste? 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	—
	<ul style="list-style-type: none"> Section 264.17(b) is complied with? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	—
	Are wastes stored or treated in such a way that they are protected from any material or conditions that may cause the wastes to react or ignite?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	—
Note: Facilities do not need to comply with the above if the tank system is used for emergency purpose only.				
264/265.199(b) Incompatible Wastes	Before a hazardous waste is stored in a tank that previously held an incompatible waste or material, is it thoroughly decontaminated?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	—
265.200(a)(b) Waste Analysis (Specific requirement for interim status facilities)	Is a waste analysis or trial treatment conducted whenever a tank system is used to store a hazardous waste substantially different from waste previously treated or stored; or used to treat chemically a hazardous waste with a substantially different process than any previously used in that system?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	—
	If no to 265.200(a) Has written, documented information on similar waste under similar operating conditions been obtained to show that the proposed treatment or storage will meet the requirements of 265.194(a)?	<input type="checkbox"/>	<input type="checkbox"/>	N/A

Regulatory Citation/Description	RCRA Checklist Item		Potential Violation
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Subpart O - Incinerators
264/265.347 (b)
Monitoring and Inspections

Is the complete incinerator and associated equipment (pumps, valves, etc.) inspected daily for leaks, spills and fugitive emissions?

Yes No

N/A

264.347(c)
(Not applicable to interim status facilities)

Are emergency waste cut-off systems and associated alarms tested weekly?

Yes No

N/A

264.345(d)
(Not applicable to interim status facilities)

Is the incinerator combustion zone sealed?

Yes No

N/A

If this is a rotary kiln incinerator, is there black smoke or evidence of emissions?

Yes No

N/A

Is the combustion zone pressure lower than atmospheric pressure? If no, what is the reading? (explain below)

Yes No

N/A

If the pressure is not measured in the combustion zone, what alternative methods are used equivalent to maintenance of combustion zone pressure? (explain below)

N/A

Regulatory Citation/Description	RCRA Checklist Item	Potential Violation
264.345 (e) Operating Requirements (Not applicable to interim status facilities)	Determine whether there is a functioning system to automatically cut off waste feed to the incinerator when operating conditions deviate from the permitted levels? (Optional: Facilities can simulate operating conditions to trigger the shut-off ...inspector should observe actual shut-off)	<input type="checkbox"/> Yes <input type="checkbox"/> No <i>N/A</i>
264/265 Unplanned Incinerator Stack Emissions	How many times did the emergency bypass stack open during the past 6 months of operation?	<input type="checkbox"/> Times <input type="checkbox"/> Minutes <i>N/A</i>
264.31 265.31 264.340	How many times was the automatic waste feed cut-off system activated during the past 30 days of operation?	<input type="checkbox"/> Times
	Due to CO excursion? Due to Temperature excursions? Due to Waste feed excursions? Other causes?	<input type="checkbox"/> Times <input type="checkbox"/> Times <input type="checkbox"/> Times <input type="checkbox"/> Times <i>N/A</i>

2016 Final Annual Recharacterization Waste Code Assignments - National

Waste Stream	Description Subcategory	2015 NATIONAL Profile	2015 National Waste Codes	Changes from 2015 to 2016	2016 National Waste Codes	2016 NATIONAL Profile
Aqueous Brake Cleaner	N/A	150100	None	No Change	None	150100
Branch Contaminated Debris	N/A	Refer to CH Outbound	F002, F003, F005, D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043	No Change	F002, F003, F005, D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043	Refer to CH Outbound
Immersion Cleaner	N/A	155629	D006, D008, D027, D039, D040	Remove D006, D008	D027, D039, D040	150133
Parts Washer Solvent 105 Virgin	under 100 lbs	150045	D001, D018, D039, D040	No Change	D001, D018, D039, D040	150045
	over 100 lbs (RQ)	150085				150085
	Non-RQ DF container (no DOT SP)	157045				157045
Bulk MS Solvent	N/A	Refer to CH Outbound	D001, D018, D039, D040	No Change	D001, D018, D039, D040	Refer to CH Outbound
Parts Washer Solvent Sludge/Dumpster Mud	N/A	Refer to CH Outbound	D001, D018, D039, D040	No Change	D001, D018, D039, D040	Refer to CH Outbound
Parts Washer Solvent Tank Bottoms (bulk)**	N/A	Refer to CH Outbound	D001, D018, D039, D040	No Change	D001, D018, D039, D040	Refer to CH Outbound
Premium (150) / PRF / PDF Mil Spec Solvent	N/A	150055	D039	No Change	D039	150055
	DF container (no DOT SP)	157055				157055
Paint Gun Cleaner (SK)	under 100 lbs	150380	F003, F005, D001, D018, D035, D039, D040	Add D022	F003, F005, D001, D018, D022, D035, D039, D040	150370
	over 100 lbs (RQ)	150425				152002
Clear Choice Paint Gun Cleaner	under 100 lbs	150426	F003, D001, D018, D035, D039, D040	Add D022	F003, D001, D018, D022, D035, D039, D040	156370
	over 100 lbs (RQ)	150427				156371
Paint Waste Other ***	Any size container	150375	F003, F005, D001, D018, D035, D039, D040	Add D022	F003, F005, D001, D018, D022, D035, D039, D040	157372
	30 Gal Container	150376				157373
	55 Gal Container	150377				157374
Universal Paint Gun Cleaner	N/A	403901294	F003, D001, D018, D035, D039, D040	Add D022	F003, D001, D018, D022, D035, D039, D040	157375
Dry Cleaner (Perc) Bottoms	N/A	150589	F002, D007, D039, D040	Add D030, D033	F002, D007, D030, D033, D039, D040	154000
Dry Cleaner (Perc) Filters	N/A	150621	F002, D007, D039, D040	Add D030, D033	F002, D007, D030, D033, D039, D040	154001
Dry Cleaner (Perc) Separator Water	N/A	150591	F002, D039, D040	Add D030, D033	F002, D030, D033, D039, D040	154002
Dry Cleaning Naphtha Bottoms	N/A	150422	D001, D007, D039, D040	No Change	D001, D007, D039, D040	150422
Dry Cleaning Naphtha Filters	N/A	150424	D001, D007, D039, D040	No Change	D001, D007, D039, D040	150424
Dry Cleaning Naphtha Separator Water	N/A	150423	D001, D039, D040	No Change	D001, D039, D040	150423
Aqueous Parts Washer Tank Bottoms	N/A	Refer to CH Outbound	NONE	No Change	NONE	Refer to CH Outbound
Aqueous Parts Washer Dumpster Sludge	N/A	Refer to CH Outbound	NONE	No Change	NONE	Refer to CH Outbound
Parts washer solvent tank bottoms are SK-generated wastes from the cleanout of solvent storage tanks. Safety-Kleen does not accept this waste stream from non-SK generators.						
Profile 157372 is acceptable to use for any size container of paint waste. For those states that require 30-gal paint waste to be listed separately, use profile 157373. For states that require 55-gal paint waste to be listed separately, use profile 157374.						



ANNUAL WASTE MINIMIZATION CERTIFICATION

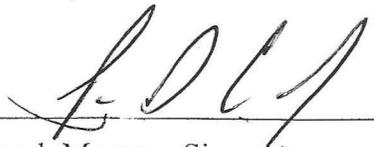
In accordance with Part III of the HSWA portion of the RCRA permit and Part VI of the North Carolina Hazardous Waste Management Permit for this Safety-Kleen facility, this notice also serves as our annual Waste Minimization Certification as required by 40 CFR 264.73(b)(9).

As a recycler of hazardous wastes, Safety-Kleen facilities receive hazardous wastes from off-site and bulk them for transport to our recycling facilities. In that process, Safety-Kleen becomes a Large Quantity Generator (LQG) of hazardous waste.

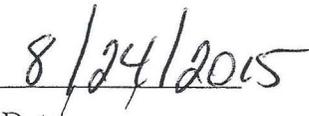
In addition to those wastes received from off-site, wastes are generated as a result of clean-up of spills, collection of potentially contaminated rainwater, use of solvent for on-site drum and parts cleaning, maintenance and operations such as painting, oil changes, etc. As a transporter, Safety-Kleen becomes a LQG by bulking non-hazardous spent mineral spirits with hazardous spent mineral spirits. These bulking operations are necessary for the cost effective transport and recycling of the non-hazardous wastes to the recycling facilities. See Waste Minimization Program, Sections 2 and 3 for specific methodology.

As the Branch Manager of this Safety-Kleen facility, I hereby certify that Safety-Kleen has a program in place to reduce the volume and toxicity of the hazardous waste generated to the degree determined by Safety-Kleen to be economically practicable; and

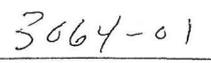
The proposed method of treatment, storage or disposal is the most practicable method available to Safety-Kleen, which minimizes the present and future threat to human health and the environment.



Branch Manager Signature



Date



Branch No./EPA ID No.



Via FedEx

January 23, 2015

Ms. Jenny Lopp
Financial Compliance Analyst
Hazardous Waste Section
North Carolina Department of Environment
And Natural Resources
Division of Waste Management
1646 Mail Service Center
Raleigh, North Carolina 27699

RE: Safety-Kleen Systems, Inc.
Financial Assurance
January 25, 2015 Annual Inflation Increase

Dear Ms. Lopp:

Enclosed is an original insurance certificate issued by Indian Harbor Insurance Company for financial assurance coverage for Safety-Kleen's facilities located in North Carolina

The certificate has been amended, effective January 25, 2015, to reflect the annual inflation increase of the financial assurance. The increase was calculated by using information obtained on February 4, 2014 from the U.S. Department of Commerce, Bureau of Economic Analysis, Table 1.1.9 Implicit Price Deflators for Gross Domestic Product as indicated below:

<u>2013 Annual GDP</u>	<u>106.570</u>	divided by:
2012 Annual GDP	105.002	

Implicit Price Deflator for January 25, 2015 = 1.015 or 1.5%

Please contact me if you have any questions or need additional information. I can be reached at 803-225-5459 or at hodge.kathleen@cleanharbors.com.

Sincerely,

Kathy Hodge
Manager, EHS Compliance Administration

1021 Pebble Lane | Manning, SC 29102
803.225.5459 | Safety-Kleen Systems, Inc. | A Clean Harbors Company | Safety-Kleen.com

CERTIFICATE OF INSURANCE FOR CLOSURE AND/ OR POST-CLOSURE CARE AND/OR
CORRECTIVE ACTION

Name and Address of Insurer (herein called the "Insurer"):

Indian Harbor Insurance Company
Seaview House, 70 Seaview Avenue
Stamford, CT 06902-6040

Name and Address of Insured (herein called the "Insured"):

Safety-Kleen Systems, Inc.
2600 North Central Expressway
Suite 400
Richardson, TX 75080

Facilities Covered:

			Closure:	Corrective Action
Charlotte 3-031-01	2320 Yadkin Avenue Charlotte, NC 28205	NCD079060059	\$169,734	\$149,798
Archdale 3-064-01	6182 Old Mendenhall Rd Archdale, NC 27263	NCD077840148	\$219,080	\$72,583
Raleigh 3-171-01	125 Sommerville Park Rd Raleigh, NC 27603	NCD000776740	\$192,877	\$110,873
St. Paul 3-031-02	934 North 5 th Street St. Pauls, NC 28384	NCD980846935	\$153,778	\$104,206
TOTAL:			\$735,469	\$437,460

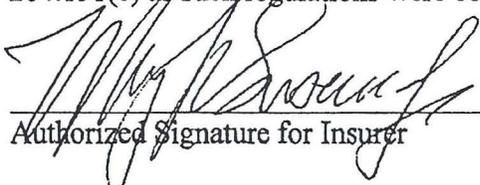
Face Amount: \$1,172,929
Policy Number: PEC000659413
Effective Date: January 25, 2015

The Insurer hereby certifies that it has issued to the Insured the policy of insurance identified above to provide financial assurance for closure and corrective action for the facilities identified above.

The Insurer further warrants that such policy conforms in all respects with the requirements of 40 CFR 264.101(a), 264.101(b), 265.101(c), 264.143(e), 264.145(e) as applicable and as such regulations were constituted on the date shown immediately below. It is agreed that any provision of the policy inconsistent with such regulations is hereby amended to eliminate such inconsistency.

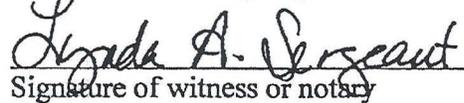
Whenever requested by the Secretary of the Department of Environment and Natural Resources, the Insurer agrees to furnish to the Secretary a duplicate original of the policy listed above, including all endorsements thereon.

I hereby certify that the wording of this certificate is identical to the wording specified in 40 CFR 264.151(e) as such regulations were constituted on the date shown immediately below.



Authorized Signature for Insurer

Mary Ann Susavidge, Vice President
Name of Person Signing/ Title/Address



Signature of witness or notary

1-22-15

Date

NOTARIAL SEAL
LYNDA A SERGEANT
Notary Public
UWCHLAN TWP, CHESTER COUNTY
My Commission Expires Jun 19, 2016

From: (803) 473-4972
Kathy Hodge
Safety-Kleen Systems Inc
1021 Pebble Lane

Origin ID: FLOA



J151015011403uv

Manning, SC 29102

Ship Date: 23JAN15
ActWgt: 1.0 LB
CAD: 100021226/NET3610

Delivery Address Bar Code



SHIP TO: (919) 508-8549

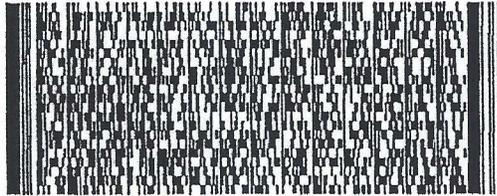
BILL SENDER

Jenny Lopp
NC DENR
1646 MAIL SERVICE CTR
DIVISION OF WASTE MANAGEMENT
RALEIGH, NC 27699

Ref # S206577ECU
Invoice #
PO #
Dept #

MON - 26 JAN AA
STANDARD OVERNIGHT

TRK# 7726 8697 8068
0201



XH SOPA

27699
NC-US
RDU



537J18F15EE4B

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North Carolina Department of Environment and Natural Resources

Pat McCrory
Governor

Donald R. van der Vaart
Secretary

May 20, 2015

Robert A. Schoepke., P.G.
Director – Remediation
Safety-Kleen Systems, Inc.
2320 Yadkin Avenue
Charlotte, North Carolina 28205

Re: Subsurface Investigation Progress Report
Safety-Kleen Systems, Inc., Archdale
EPA ID # NCD 077 840 148

Dear Mr. Schoepke:

The North Carolina Hazardous Waste Section (HWS) has reviewed the above referenced the report dated September 10, 2013. The proposed work is approved with the following comments;

Comments:

1. If the deepest soil sample is determined to be contaminated, then Safety-Kleen must get additional samples below the contaminated soil to determine the extent of contamination or the boring reaches groundwater.
2. Direct-push refusal is not an indication of reaching bedrock.
3. Cross sections should be shown relative to a standard elevation rather than to below surface level. This provides a clearer view of the subsurface soils relative to the surface soil and the groundwater level when determined.
4. The proposed well locations are acceptable. Be advised that more wells may be needed based on the actual groundwater flow direction determined once these wells have been installed and that one down gradient well may not be sufficient. When submitting the report, provide the following information on the proposed wells: well design, boring logs and well locations (latitude and longitude).

According to the Soil Investigation Report the field activities will be implemented within six weeks of receipt of this letter and the report will be completed in an additional eight weeks. Notification of dates that Safety-Kleen intends to install wells and conduct soil borings would be

Mr. Robert Schoepke
May 20, 2015
Page 2

appreciated as we may want to visit the facility during these field activities. If you have any questions, please contact me at (919) 707-9214 or kathleen.lawson@ncdenr.gov.

Sincerely,



Kathleen Z. Lawson
Facility Management Branch
Hazardous Waste Section

cc: John E. Johnston, US EPA, Region 4
Phil D. Curry, Safety-Kleen
Todd Blake, Safety-Kleen
Genna Olsen, ATC Associates
Robert Schoepke, Safety-Kleen
Bud McCarty
Jim Gilreath
Kathleen Z. Lawson



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)
10/28/2015

Page 1 of 2

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

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

PRODUCER Willis of Massachusetts, Inc. c/o 26 Century Blvd. P. O. Box 305191 Nashville, TN 37230-5191	CONTACT NAME	
	PHONE (A/C, NO, EXT): 877-945-7378	FAX (A/C, NO): 888-467-2378
	E-MAIL ADDRESS: certificates@willis.com	
	INSURER(S) AFFORDING COVERAGE	NAIC#
INSURED Safety Kleen Systems Inc. and its affiliates 42 Longwater Drive Norwell, MA 02061	INSURER A: ACE American Insurance Company	22667-001
	INSURER B: American Guarantee and Liability Insuranc	26247-003
	INSURER C: ACE American Insurance Company	22667-076
	INSURER D: Indemnity Insurance Company of North Amer	43575-003
	INSURER E: Illinois Union Insurance Company	27960-002
	INSURER F:	

COVERAGES

CERTIFICATE NUMBER: 23763568

REVISION NUMBER:

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

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR <input checked="" type="checkbox"/> XCU <input checked="" type="checkbox"/> Contractual GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input checked="" type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC OTHER:		X	HDQG2740067A	11/1/2015	11/1/2016	EACH OCCURRENCE \$ 2,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 500,000 MED EXP (Any one person) \$ 5,000 PERSONAL & ADV INJURY \$ 2,000,000 GENERAL AGGREGATE \$ 4,000,000 PRODUCTS-COMP/OP AGG \$ 4,000,000 \$
A	<input checked="" type="checkbox"/> AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO <input checked="" type="checkbox"/> ALLOWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS <input checked="" type="checkbox"/> NON-OWNED AUTOS <input checked="" type="checkbox"/> MCS-90		X	ISAH08860889	11/1/2015	11/1/2016	COMBINED SINGLE LIMIT (Ea accident) \$ 5,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
B	<input checked="" type="checkbox"/> UMBRELLA LIAB <input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DED RETENTION \$			AUC-4275262-11	11/1/2015	11/1/2016	EACH OCCURRENCE \$ 10,000,000 AGGREGATE \$ 10,000,000 \$
C	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below			WLRC48592715	11/1/2015	11/1/2016	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTHER E.L. EACH ACCIDENT \$ 2,000,000 E.L. DISEASE - EA EMPLOYEE \$ 2,000,000 E.L. DISEASE - POLICY LIMIT \$ 2,000,000
D			N/A	WLRC48592739	11/1/2015	11/1/2016	
E	Contractors Pollution Liability			COO G27416603 001 CPL	11/1/2015	11/1/2016	\$10,000,000 Each Claim \$10,000,000 All Claims \$250,000 SIR

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

See Attached:

CERTIFICATE HOLDER

CANCELLATION

For Reference Only	SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.
	AUTHORIZED REPRESENTATIVE

Coll:4794028 Tpl:2005878 Cert:23763568 ©1988-2014 ACORD CORPORATION. All rights reserved.



ADDITIONAL REMARKS SCHEDULE

AGENCY Willis of Massachusetts, Inc.		NAMED INSURED Safety Kleen Systems Inc. and its affiliates 42 Longwater Drive Norwell, MA 02061	
POLICY NUMBER See First Page		EFFECTIVE DATE: See First Page	
CARRIER See First Page	NAIC CODE		

ADDITIONAL REMARKS

THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM,
 FORM NUMBER: 25 FORM TITLE: CERTIFICATE OF LIABILITY INSURANCE

Pollution Legal Liability
 Carrier: Indian Harbor Insurance Company
 Policy Number: PEC0042039-02
 Policy Term: 11/1/2015 - 11/1/2016
 Limits: \$10,000,000 Each Claim/Aggregate

FIGURE G-4
EMERGENCY CONTACT LIST (Rev. 7/25/14)
SAFETY-KLEEN ARCHDALE, NORTH CAROLINA

TYPE OF CONTACT	INDIVIDUAL/ORGANIZATION/AGENCY	EMERGENCY PHONE NUMBERS
Emergency Coordinators	<p style="text-align: center;">Primary: Phil Curry 3658 Liberty's Run Drive Sophia, NC 27350</p> <p style="text-align: center;">Alternate: Jason Honeycutt 283 Johnson Road Denton, NC 27239</p>	<p>Home: (336) 861-9447 Office: (336) 861-4149 Cell: (336) 451-4370</p> <p>Home: (336) 479-3048 Office: (336) 861-4149 Cell: (336) 451-4368</p>
Local Emergency Response Agencies	<p style="text-align: center;">Fire: Guil-Rand Fire Department 10506 South Main Street Archdale, NC 27263</p> <p style="text-align: center;">Police: Archdale Police Department 307 Balfour Drive, Archdale, NC 27263</p>	<p style="text-align: center;">911 (Emergency) (336) 431-2512 (non-Emergency)</p> <p style="text-align: center;">911 (Emergency) (336) 431-9141 (non-Emergency)</p>
Local Hospital	<p style="text-align: center;">High Point Regional Hospital 601 N Elm St, High Point, NC 27262</p>	<p style="text-align: center;">(336) 878-6009 (Emergency Center – 24 Hrs.)</p>
General Notification	<p style="text-align: center;">Safety-Kleen Incident Notification System</p> <p style="text-align: center;">NCDENR Emergency Spill/Incident Reporting</p> <p style="text-align: center;">USEPA National Response Center</p>	<p style="text-align: center;">(800) 468-1760 (24 Hrs.)</p> <p style="text-align: center;">(800) 858-0368 (24 Hrs.)</p> <p style="text-align: center;">(800) 424-8802 (24 Hrs.)</p>
Emergency Response Contractor	<p style="text-align: center;">Clean Harbors Environmental Services, Inc.</p>	<p style="text-align: center;">(800) 645-8265 (24 Hrs.)</p>
Emergency Equipment Supplier	<p style="text-align: center;">Safety-Kleen Lexington Distribution Center 224 Industrial Drive, Lexington, SC 29072</p>	<p style="text-align: center;">(803) 359-2495</p>



Safety Starts with Me

**Safety Starts with Me:
Live It 3-6-5**

Continually improving safety at Clean Harbors is our commitment. We believe that zero incidents is a goal we can achieve and that no one should get hurt while working at Clean Harbors. While experience has significant value in working safely, it doesn't ensure wisdom in all our safety actions. Combining experience with proactive safety measures and reminders will help keep you and your coworkers safe. But it's your 100% personal commitment to safety that will have the most impact on your safety and that of your coworkers, family, and friends. We encourage you to apply the information and share it with your family, and friends.

Remember: You are the one most responsible for your safety on and off the job, so always choose safety. Someone will thank you later.

"I think the name says it all - 365 days a year, we need to work safe and be safe, whether we are at work or home with our families and loved ones, or in-transit." – Alan S. McKim, CEO and Chairman, Clean Harbors

Safety Starts with Me Posters

Safety Starts with Me Videos

Forms

- Title
- Safety Starts with Me: Live It 3-6-5 Form

3 SAFETY PHILOSOPHIES

1. Nothing is worth getting injured over.
2. All near misses and accidents are preventable.
3. Safety must be actively managed.

6 GOLDEN RULES OF SAFETY

1. I will drive responsibly without distractions or impairments.
2. I will think before I start and know my safety plan every day.
3. I will only undertake the work in which I am trained.

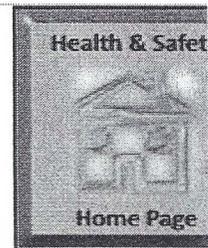
Safety Starts with Me Store

Click on the applicable web at the bottom to see the Safety Starts with Me: Live it 3-6-5 cards, posters, lanyards, et order from the Company S

Note: There is a Canada B Section and a United State: Section for ordering.

Canada Store

United States Store





Health and Safety File Cabinet



Shared Documents

Type	Name	Modified	Modified By
Folder	Additional Training Material	8/10/2015 2:46 PM	Williams, Floyd
Folder	Facility Health and Safety Profiles	9/30/2015 2:51 PM	Williams, Floyd
Folder	INVEST Safety Program	1/22/2015 2:00 PM	Williams, Floyd
Folder	OSHA Monthly Module Training Material	7/22/2014 4:40 PM	Sebastian, Gregory A
Folder	Poste de traite	9/24/2014 3:23 PM	Williams, Floyd
Folder	Standard RAGAGEP	7/10/2014 3:51 PM	Laskar, Sandipan A
Folder	Trading Post	9/24/2014 3:00 PM	Williams, Floyd
Folder	Training Deficiency Reconciliation	4/30/2015 10:41 AM	Williams, Floyd
Folder	We are CleanHarbors	2/23/2015 12:45 PM	Williams, Floyd
Document	2016 OHD - Bullex Schedule	1/8/2016 12:30 PM	Andrews, John S
Document	63CY HS Committee Meeting Minutes September 2015	10/16/2015 9:48 AM	DETAR, CYNTHIA LYNN
Document	Build-a-Better-Brainshark-Guide	3/9/2015 9:26 AM	Williams, Floyd
Document	CH Approved Confined Space Vendor List 2014-06-01	2/18/2015 10:59 AM	Galczak, Jerry

Links

- ▣ Safety Video Brainsharks
- ▣ Central Compliance Homep
- ▣ BrainShark Safety Tailgate Walking on Slippery Surfac
- ▣ BrainShark Safety Tailgate Weather Safety Hazards
- ▣ IHS Engineering Resource name: CLEANEN Password
- ▣ BrainShark Safety Tailgate Route to Safety
- ▣ Housekeeping Brainshark F
- ▣ Brainshark Safety Tailgate Eyewash Drench Hose Safe
- ▣ BrainShark Safety Tailgate Misses
- ▣ No Unauthorized Personne Tailgate
- ▣ BrainShark Safety Tailgate Packaging, Transport and Oxidizers
- ▣ Hurry up can Hurt
- ▣ Safety Attitude Tailgate
- ▣ Free read-only access to al
- ▣ Brainshark Safety Tailgate Conducting JHA

	Creating Shortcut to HS File Cabinet SharePoint Site - Tutorial	11/19/2014 2:07 PM	Sebastian, Gregory A	<ul style="list-style-type: none"> http://www.brainshark.com KleenSystems/vu?pi=zGoz19fQ83zL7ifz0 Brainshark Safety Tailgate Hydrogen Sulfide Awareness Taking Responsibility for Safety Safety Starts with Me Site Weekly Safety Tailgate top Hazards
	Facilities Group Hearing Conservation Program Spreadsheet	10/23/2015 9:36 AM	Williams, Floyd	
	FitTrack Gold Manual	12/16/2014 1:14 PM	Andrews, John S	
	hard-hat-md[2]	11/18/2014 8:57 AM	Sebastian, Gregory A	
	Health and Safety file Cabinet LOV list	7/28/2014 3:29 PM	Sherman, Kevin L	(More Links...)
	HS Document Mgt System	8/27/2014 10:11 AM	Williams, Floyd	Add new link
	iDashboard UserManual	9/15/2015 2:35 PM	Petten, Warren	
	Index of Sharepoint Document Storage Locations	3/4/2015 11:35 AM	Andrews, John S	
	NFPA 491M 1991	5/28/2014 2:38 PM	Williams, Floyd	
	NFPA 70E Electrical Safety Facility InitiativeTracking Sheet	11/18/2015 12:13 PM	Galczak, Jerry	
	OHD Certificate of Calibration for 2015	7/23/2015 2:13 PM	Wright, Lucinda	
	PSM Mechanical Integrity T3 Standard (HS.00012.T3S-10HS)	10/27/2015 3:15 PM	Rancier, Beverly	
	PSM Operating Procedure Audit Checklist and Supporting Examples	8/3/2015 4:15 PM	Sparaco, Peter	
	Sharepoint Document Dump	10/15/2014 10:27 AM	Williams, Floyd	
	SOP Evaluation Checklist	2/9/2015 1:24 PM	Williams, Floyd	
	Tailgate Topics and Assignments 2015 - update with Brainshark Links	12/18/2015 2:24 PM	Galczak, Jerry	
	Tailgate Topics and Assignments 2016 - with BrainShark Links	2/8/2016 10:27 AM	Andrews, John S	

1 - 30

Add document

Safety-Kleen®

PROTECTION · CHOICES · PEOPLE
MAKE GREEN WORK

Environmental Compliance

Contact: Todd Blake

Cell: 336-644-0332

- Permit development and maintenance including RCRA, CAA, CWA, SWPPP, USCG, Solid Waste, etc., including permit renewals and permit modifications.
- Regulatory affairs dealing with EPA, State RCRA Agencies, local agencies (e.g., CUPA, Fire Dept)
- National account and local sales support for development of customer compliance programs
- Management of agency issued or proposed NOV's, fines, penalties, consent orders, etc.
- Branch and sales support on Environmental Policies/BOGs/SOPs/EMS
- Direct Branch support with RCRA interpretation, waste characterization, generator responsibilities, etc.
- Oversight management of contamination events (e.g., PCBs in used oil).
- Regulatory driven reporting including TIER 2, TRI, emissions, annual/biennial, others
- RCRA, EMS, permit, and other required compliance training
- Program development including ISO 14001 EMS, process improvement, CUP, RFO marketing
- SK advocate for proposed environmental regulations on a state level (e.g., solvents regs in the South Coast AQMD and OTC).
- Customer audits of SK facilities
- RCRA and other compliance audits of SK facilities and 3rd Party vendor facilities.

Health and Safety

Contact: Ed Krise

Cell: 615-584-1221

- Incident Reporting for employee injury or illness, 3rd Party injury, and Near Miss reporting
- Questions on Health and Safety Regulations, Policies and Standards.
- Review of BOGs, JHAs, and SOPs prior to use
- OSHA or MSHA agency Contacts/Visits/Inspections/Investigations/NOV/Citations
- Safety audits, inspections, and corrective actions plans
- OSHA 8 Hour Monthly Modules; delivery, questions, tracking
- Safety training topics/tracking/reporting
- Hazard Assessment questions; at branch, on site, documentation
- PPE Hazard Assessment, documentation, selection, resourcing
- Safety Observations communications/questions
- Safety Suggestions
- Safety Boot program administration
- Prescription Safety Glass Program administration
- Safety Committee Meeting topics, evaluation, and participation
- Health and Safety Policy Deviations reporting/investigation/corrective actions
- Contractor Safety Surveys/Program reviews/Selection
- Client Safety Surveys; Safety questionnaires completion

Transportation Compliance

Contact: Paul Krug

Cell: 863-221-7572

- Incident Reporting for motor vehicle accidents, unintentional in-transit releases, motor vehicle complaints & roadside inspections & citations.
- Federal/State/Provincial transportation/security related (e.g. FMCSA, FRA, FAA, US Coast Guard, Transport Canada) agency visits, inspections, NOV/Citations.
- Questions on transportation related regulations, policies, and standards.
- Transportation related permits, authorities, operating authorities, registrations, fuel tax & toll accounts.
- Questions on hazardous material shipments, truck-to-truck activities.
- Driver qualification procedures.
- Transportation audits, corrective actions and management plans.
- On-road performance tracking, metrics and reporting
- Incident/accident investigations, reporting & record-keeping.
- Focused training for managers & drivers.

SAFETY-KLEEN SYSTEMS, INC. LOCATIONS

STATE OF NORTH CAROLINA

**2320 Yadkin Avenue
Charlotte, NC 28225** **NCD079060059**

**12040 Goodrich Drive
Charlotte, NC 28273**

**125 Sommerville Park Road
(aka 6225 Old Stage Road)
Raleigh, NC 27603** **NCD000776740**

**934 North 5th Street or
Highway 301, North
St. Paul, NC 28384** **NCD980846935**

**6180-82 Old Mendenhall Road
Archdale, NC 27263** **NCD077840148**

SECTION H

PERSONNEL TRAINING

The information contained in this section is submitted in response to 40 CFR 270.14(b)(12) and 264.16.

H-1 Training Program

The training program implemented at Safety-Kleen for training employees in the safe handling of hazardous wastes includes classroom, interactive, written, and on-the-job training. Provisions are made for updating or revising the program as necessary to ensure compliance with the terms of the RCRA permit, changing Facility conditions, and organizational changes.

For an outline of the Training Program provided to Facility employees, refer to Table H-1.

H-2 Job Titles and Duties

The Branch General Manager is ultimately responsible for day-to-day operations, environmental compliance, and site-specific training of Facility employees. The Facility employees report to the Branch General Manager, who in turn, must provide them with the necessary resources to execute their job duties. With respect to environmental compliance, the Branch General Manager must:

- Keep the Facility clean and orderly.
- Perform or designate an employee to perform the written Facility inspections, and correct any deficiencies revealed by the inspection.
- Know the potential hazards of the material and wastes handled on-site.

- Identify potential spill and fire sources and be able to execute the Contingency Plan.
- Inform all employees of their environmental responsibilities.
- Notify the proper authorities during an emergency, remedy the situation to best of his abilities, and submit necessary reports to Corporate Office and regulatory agencies.
- Maintain all environmental records (such as manifests, training records, inspection records, spill reports, etc.) on file.

The Environmental, Health and Safety Department is responsible for environmental training of the Branch General Manager, and for permitting and other compliance issues for the Facility. The Environmental, Health and Safety Department will:

- Provide oversight and training of personnel in accordance with environmental regulations and Corporate policy.
- Notify the proper authorities, oversee remedial actions and submit written reports to the regulatory agencies after an emergency situation has occurred.
- Assure that environmental permits are submitted and updated as required.
- Manage any environmental compliance issues that exceed the resources available at the Facility level.
- Participate in training new Branch Managers.

Presented below are the job titles of the personnel at the Facility.

- Branch General Manager (also referred to as Branch Manager).*
- Customer Service Manager.*
- Sales and Service Representative.*
- Branch Secretary.*
- Lead Warehouseman.*
- Warehouseman.*

* Subject to training mandated by 40 CFR 264.16. Job descriptions are subject to frequent change. Current job descriptions are included in the personnel training files for employees filling their positions. Examples of these job descriptions are provided in Appendix H-1.

At any given time, one or more positions may be vacant for the job titles listed above. Pursuant to 40 CFR 264.16(d)(1) and (2), job descriptions for the Safety-Kleen Facility personnel are kept on file at the Facility.

It should be noted that Safety-Kleen does have a designated Emergency Coordinator for the Facility. The role of Emergency Coordinator, however, is not a specific job title. Safety-Kleen utilizes the following criteria for selecting an Emergency Coordinator:

- Experience and knowledge of Facility operations and in handling emergency situations related to hazardous material.
- Authority to commit resources to respond to emergencies, as specified in Section G (Contingency Plan).
- Location of residence (in proximity to Facility).

Personnel being considered to assume Emergency Coordinator responsibilities will not be authorized to become an Emergency Coordinator unless they meet the above-mentioned criteria and have been trained in its implementation.

H-3, H-4, and H-5 Training Content, Frequency, and Technique

An outline of the introductory and annual training program for facility employees is shown in Table H-1. During the training program, employees are instructed on (1) the potentially dangerous nature of hazardous wastes; (2) the importance of maintaining compliance with RCRA regulations; (3) the proper handling and storage procedures for

hazardous wastes; and (4) emergency procedures and contingency plan. New employees are not permitted to work in unsupervised positions until they have received all applicable training. Employees must be completely trained in all items listed in Table H-1 within the first six months of starting work and annually thereafter.

Each employee is trained to operate and maintain the Facility safely and to understand hazards unique to the job assignment. Safety-Kleen's training programs are designed to give employees appropriate instruction (relative to the position) regarding the hazardous waste management procedures they will encounter in performing their respective duties.

The relevancy of this training may vary slightly depending on an employees' particular position. For example, administrative personnel have little involvement beyond paperwork and recordkeeping in the operation of the Facility. The role of the administrative staff in an emergency is usually limited to evacuating safely when required and accounting for personnel at the assembly point. Facility management personnel receive training in all aspects of the operation since they routinely perform multiple tasks, including implementation of the Contingency Plan. Since Operations and Service personnel have varying responsibilities in the day-to-day operations at the Facility, their site-specific training may focus more on container management standards, return and fill operations, tank management standards, inspections, waste acceptance procedures, and emergency response procedures. The relevancy of the site-specific portion of the training for Sales personnel will focus more heavily on waste acceptance, manifesting, generator requirements, container management standards, waste analysis plan implementation and emergencies.

Since the handling of hazardous materials is a large part of the operations of the service center, all employees are given training in applicable environmental regulations, transportation regulations, spill prevention control and countermeasures, preparedness, prevention, and the RCRA Contingency Plan. A minimum of 24-hours HAZWOPER

training (29 CFR 1910.120) is also provided to all employees in a non-administrative position prior to working with hazardous materials.

This training program is designed to ensure that personnel not only handle hazardous wastes in a safe manner and minimize/prevent pollution, but also properly respond to emergency situations. The program trains hazardous waste handling / management personnel to maintain compliance under both normal operating conditions and emergency conditions.

Training elements address non-routine and emergency situations (i.e., storms, power outages, fires, explosions, spills) including:

- Procedures for locating, using, inspecting, and replacing facility emergency and monitoring equipment.
- Emergency communication procedures and alarm systems.
- Response to fires or explosions.
- Response to groundwater contamination incidents and procedures for containing, controlling, and mitigating spills.
- Shutdown of operations and power failure procedures.
- Procedures for evacuation.

TABLE H-1

INTRODUCTORY AND ANNUAL TRAINING
PLAN OUTLINE FOR FACILITY EMPLOYEES

- I. Purpose of Training and a Review of the Training Plan Outline
- II. Environmental Regulations and Customer Responsibilities
 - a. Small Quantity Generator vs. Large Quantity Generator
 - b. Manifesting – How to Complete and Distribute a Manifest
 - c. EPA Identification Numbers
 - d. Reclamation Agreements
 - e. Land Disposal Restriction Notifications
 - f. Closure and Financial Assurance
- III. Transportation Regulations
 - a. Permits
 - b. Vehicle Inspections and Records
- IV. Waste Analysis Plan
 - a. Types of Waste Accepted at the Facility
 - b. Analyzing/Inspecting Incoming Shipments
- V. Preparedness and Prevention
 - a. Performing and Recording a Facility Inspection
 - b. Proper maintenance of Storage Facilities and Associated Equipment
 - c. Emergency Equipment – Availability and Use

TABLE H-1 (CONTINUED)
INTRODUCTORY AND ANNUAL TRAINING
PLAN OUTLINE FOR FACILITY EMPLOYEES

- VI. Contingency Plan
 - a. Implementation of the Contingency Plan – Personnel and Emergency Functions
 - 1. Spills and Fires and Proper Response Actions
 - a. On-Site Accidents
 - b. Transportation Accidents
 - 2. Reporting Requirements
 - a. Safety-Kleen Incident Reporting
 - b. State Emergency Response System
 - c. National Response Center
 - d. Emergency Information
 - e. Review of Material Safety Data Sheets

- VII. Operating Log / Record keeping
 - a. Inspections
 - b. Shipment logging (incoming and outgoing)

- VIII. Permit Requirements
 - a. Container and Tank Storage
 - b. Other

- IX. Hazardous Waste Transportation Requirements
 - a. Management of containers in transit (10-day transfer requirements)
 - b. Manifest completion

- IX. Changes in Regulations

The outline is used as the basis or framework for training Safety-Kleen personnel in the proper procedures, equipment, and systems to be used in managing hazardous wastes.

Safety-Kleen supplements the introductory and annual training with a series of videotapes and computer-based training programs. These supplements are used by Safety-Kleen as one of several training aids and are subject to update whenever deemed necessary. Safety-Kleen may also replace them with other training aids in the future.

H-6 Training Director

The Safety-Kleen Environmental, Health and Safety Manager assigned to a particular Facility oversees and directs the hazardous waste management training program described herein.. This person coordinates such training with the Corporate Environmental, Health and Safety Department. Regional Health and Safety Managers and Environmental, Health and Safety Managers assist Branch Managers in maintaining compliance at Safety-Kleen facilities in their geographic area of the country. Branch Managers experienced in hazardous waste management procedures may assist in presenting all or part of the site-specific portion of this training. On-the-job training is provided by supervisory personnel skilled in Facility operations. The cooperative effort of these managers must:

- Provide a training program that address the requirements of environmental regulations and corporate policy.
- Notify the proper authorities, oversee remedial actions, and submit a written report to the state after an emergency situation has occurred.
- Manage any environmental compliance issues that exceed the resources available at the service level.

- Participate in training new Branch Managers

Qualifications for Safety-Kleen certified regulatory trainers are available upon request. Typical qualifications include requisite education and/or experience in hazardous waste regulatory compliance and completion of Safety-Kleen's Regulatory Train-The-Trainer Certification process.

H-7 Record Keeping

Each employee currently working unsupervised at the Facility has been fully trained at the time of this submittal. All Safety-Kleen personnel are trained within the first six (6) months of employment and annually thereafter. New employees are not permitted to work in unsupervised positions until they have completed the training requirements.

Records documenting the job title for each position, job descriptions, names of employees, and completed training programs (both introductory and continuing) are kept on-site. These records will be kept until closure of the facility for current employees and for three (3) years from the date of the individual employee's termination for former employees.

When an employee is transferred to another Safety-Kleen position / location, his / her training records are forwarded to the new location and copies are maintained at the former facility. Employees transferring to a North Carolina Safety-Kleen Facility will receive training on those items that differ from the previous Facility (i.e., contingency plan, permit requirements, etc.).

Todd M. Blake, CHMM

2815 Norwell Court
Oak Ridge, NC 27310

Work: (336) 644-0332
Home: (336) 643-7165

Regulatory Compliance Management Professional

Energetic, results-oriented professional with 16 plus years progressive experience in environmental, health and safety regulatory affairs. Highly motivated with the ability to manage multiple, fast-tracked projects and effectively interact among various organizational levels. Possesses exceptional knowledge of Federal and State environmental, health and safety, and hazardous materials transportation regulations and related permitting activities. Contributions include successfully implementing various regulatory programs and compliance oversight to significantly reduce and/or eliminate environmental risks, regulatory violations, potential penalties, reduce injury/incidents rates, and improve operational efficiencies and related cost savings.

RELATED EXPERIENCE

Safety-Kleen Systems, Inc.

High Point, North Carolina

Environmental, Health and Safety Manager

September 2002 to Present

- Developed and maintained various Federal and State regulatory permits and reports including RCRA reporting, CAA reports, SARA Title III reports, SPCC and Storm Water Pollution Prevention Plan revisions.
- Developed, promoted, and implemented various environmental, health and safety regulatory compliance programs for six Part B permitted commercial hazardous waste management and related transfer facilities.
- Successfully prepared and secured several permit modifications and permit renewals to enable operational flexibility and increase revenues. Saved company >\$35K by simultaneously preparing four RCRA Part B permit renewal applications.
- Conducts OSHA HAZWOPER refresher and various other EPA and USDOT Hazardous Material/Waste required training courses.
- Participates in internal EMS/ISO 14001 Implementation, Training and Auditing.

Regional Director of Environmental Compliance, Chemical Services Division, Eastern U.S.

Region

March 2001 to Sept. 2002

Responsible for staff of nine EH&S professionals throughout ten states in the eastern United States, representing twenty major hazardous waste treatment, storage and disposal facilities, including several satellite transportation related facilities.

- Assisted field personnel by achieving target of >85% reduction in regulatory training deficiencies in the region during FY 2001.
- Coordinated and performed internal environmental management systems audits along with upper management staff that resulted in the implementation and sharing of several best management practice improvements to create robust and proactive compliance improvements and operations efficiencies at these facilities.
- Revised several key corporate environmental policy and procedures to improve environmental compliance practices and coordinated the implementation of these procedures with the environmental and operations staffs.
- Intimately involved in the coordination and preparation of one commercial PCB storage permit renewal application and two Part B permit renewal applications within less than a one year period, which resulted in a >\$75K cost savings by utilizing internal compliance and engineering resources.
- Successfully negotiated the reinstatement of CERCLA off-site approval status for several facilities in EPA Regions 3 and 4.

Todd M. Blake, CHMM

Continued

Environmental, Health and Safety Manager

(Memphis, TN, Pinewood, SC, Reidsville, NC)

March 1992 to March 2001

Administered, and implemented all regulatory compliance programs and activities at several key Safety-Kleen facilities to ensure compliance with Federal, State laws, rules and regulations, as well as with Corporate policy and procedures.

- Developed and maintained various Federal and State regulatory permits and reports including RCRA reporting, TSCA reports, CAA reports, SARA Title III reports, SPCC and Storm Water Pollution Prevention Plan revisions.
- Developed, promoted, and implemented various environmental, health and safety regulatory compliance programs for commercial hazardous waste and PCB management facilities.
- Successfully prepared and secured several permit modifications and permit renewals to enable operational flexibility and increase revenues. Saved company >\$50K by personally preparing the Memphis and Reidsville facility's Part B permit renewal applications.
- Performed comprehensive internal and third party facility audits to monitor compliance with Federal and State regulations including: RCRA, SARA, TSCA, CWA, CAA, DOT and OSHA regulations.
- Aided operations in obtaining the prestigious *E.I. Digest* Environmental Compliance Award for several years at the various facilities. Maintained perfect compliance record at the Reidsville facility since April 1997 even with a minimum of 72 regulatory inspections annually.
- Established positive relationships with Federal and State regulatory officials, which resulted in very favorable inspection outcomes and permitting negotiations.
- Coordinated and conducted numerous environmental, DOT, and health and safety training courses for operations and sales staffs in comply with various regulatory requirements and company policy.

Alabama Department of Environmental Management

1400 Coliseum Boulevard, Montgomery, Alabama 36110

Pollution Control Specialist

November 1989 to February 1992

Performed comprehensive Compliance Evaluation Inspections at numerous hazardous waste management facilities to evaluate compliance with USEPA and State hazardous and solid waste regulations.

- Participated in and led numerous compliance inspections at various generator and TSDF facilities, including the nations largest chemical waste land disposal facility.
- Expeditiously reviewed RCRA permit applications for technical adequacy and regulatory compliance while developing positive relationships with facility contacts.
- Prepared administrative enforcement actions according to agency policies, such as violation documentation and civil penalty determinations.
- Initiated field investigations including site assessments and sampling events.

EDUCATION

Auburn University at Montgomery (1989)

Degree: Bachelor of Science

Major: Environmental Science

Minors: Chemistry and Business Management

Todd M. Blake, CHMM

Continued

PROFESSIONAL AFFILIATIONS / CERTIFICATIONS

Academy of Certified Hazardous Materials Managers (CHMM) - Member
Piedmont Chapter of Certified Hazardous Material Managers - Previous Board Member
Certified Environmental, Health and Safety Trainer (Safety-Kleen)

References

Available upon request