Veolia ES Technical Solutions, L.L.C.
Permit Renewal Application Table of Contents

Section B

General Facility Description

(§270.14(b)(1))

Veolia ES Technical Solutions, L.L.C. (hereafter known as Veolia) owns and operates a hazardous waste storage and treatment facility located at the corner location of State Routes 1104 and 1106 near Butner, North Carolina. Veolia received its Part B hazardous waste storage permit from the North Carolina Department of Environment and Natural Resources (hereafter known as NCDENR) on August 24, 2012. This permit expires on August 24, 2017. As required, Veolia is submitting this permit renewal application by August 24, 2016 as requested by NCDEQ in an August 10, 2015 letter to Veolia.

Veolia is an environmental service firm specializing in the packaging, handling, transportation, treatment and disposal of hazardous wastes. Detailed information about Veolia's public service offerings is available on Veolia's website at http://veolianorthamerica.com. The operations at this facility consist of the receipt, storage, treatment (consolidation only), and transportation of containerized hazardous wastes. Tank storage or disposal activities are not conducted at this location. The maximum storage capacity of the facility is 1,600 55-gallon drums or the volumetric equivalent in other sized containers.

I. General Facility Description

The facility is located at the corner of State Routes 1104 (East Lyon Station Road) and 1106 (Will Suitt Road) near Butner, North Carolina. The site consists of one 16,000 square foot building containing both office (6,000 sq. ft.) and warehouse (10,000 sq. ft.) space. The offices accommodate management, sales, operations and customer service personnel. The warehouse is utilized for the storage of packaging materials, emergency equipment, and other supplies necessary to both field and facility operations. There is no waste storage or treatment activities in the warehouse, except for the temporary accumulation of small amounts of site generated waste (e.g., contaminated personal protective equipment, aerosol cans, samples, etc.).

All waste handling operations occur on the 130-foot loading dock extending from the rear of the warehouse, or within the secondary containment pad. The loading dock area (approximately 3120 ft^2) is under roof but not completely enclosed. The loading dock area is also equipped with a secondary containment system. The principal operation of this facility is the temporary storage of containerized waste loaded on trailers. Trailers remain parked at the loading dock prior to shipment off-site to an ultimate disposal or treatment facility. In addition, the site operations include the consolidation of compatible solid and liquid hazardous and non-hazardous wastes into larger containers, including 55-gallon drums, roll-off boxes, and cargo tanks.

The loading dock has parking spots for 20 waste containing units (e.g., trailers, roll-off boxes, cargo tanks, etc.). The loading dock area is equipped with a secondary containment system capable of handling 10% of the maximum volume of the containers stored or the volume of the largest container in accordance with 40 CFR 264.175 (detailed further in Section P). The entire site is totally enclosed by an eight (8)-foot high chain-link fence topped with razor wire. Illustrations of the site can be found on Site Drawings 1 and 2. Current structures on-site include the 16,000 ft^2 office/warehouse, the 3,120 ft^2 covered loading dock, the asphalt parking lot and driveways, and the secondary containment system which includes a containment trench in the SE quadrant of the facility.

This application addresses the hazardous waste management activities at the Veolia facility. Veolia also stores and manages universal wastes and solid wastes (i.e. non-hazardous waste) at this facility. These additional activities are not included in this document. Although not covered in this document, Veolia manages the universal wastes and solid wastes in compliance with all applicable state and federal regulations.

II. Daily Operations Plan

Veolia's operation is a permitted commercial hazardous waste container storage, transfer, and treatment (consolidation) facility.

In most instances, wastes received at the facility are initially packaged and otherwise prepared for shipment by Veolia field services personnel. At the generator's site, wastes, which have been

previously inventoried and documented on a Waste Information Profile (WIP) by Veolia technical or customer service staff, are inspected to verify that the waste conforms to the WIP. After meeting the Veolia acceptability criteria, the wastes are packaged and prepared for shipment, including the preparation of shipping papers, in accordance with DOT, EPA, and NCDEQ regulations.

Upon arrival at the Veolia facility, the manifest or shipping papers and associated paperwork are reviewed to assure they are properly completed. In addition, the containers are inspected to verify they are of good integrity and counted prior to unloading the shipment.

Alternatively, wastes are received at the facility from other waste management companies similar to Veolia (hereafter referred to as third party wastes), or directly from the generator. In both instances, only wastes determined to meet the facility's acceptance criteria as outlined in the facility's Waste Analysis Plan (WAP) are accepted. This includes a properly completed WIP that details the chemical and physical characteristics of the waste.

Upon acceptance, the containerized wastes are off-loaded onto the loading dock and then typically moved directly into a trailer or other freight container. Smaller packages, including packaged laboratory chemical containers, are temporarily staged on the loading dock for palletizing and/or stretch wrapping prior to being placed in a storage trailer. All materials are placed into a storage trailer, roll-off, cargo tank, or other container by the close of the business day.

Most trailers staged on-site are designated for shipment to authorized disposal facilities and are therefore only remain onsite for short periods of time prior to being transported off-site. Wastes may also be loaded onto trailers staged at the loading dock that are designated for storage only. The designated "storage only" trailers are not utilized to transport the wastes off-site, but instead are used to temporarily store the wastes until they are loaded onto another trailer for shipment to the designated treatment/disposal facility. Once a trailer on the dock has completed the container loading process and is ready for transportation off-site, the trailer will either be transported directly to the off-site designated facility or it may be moved to the outbound shipment area located on-site. This shipment holding area is a contained and secure area that

has been approved by the NCDEQ for the temporary holding of out-bound trailers for a period not to exceed the 10 day time frame once the aisle space in the trailer was initially broken or eliminated.

III. Waste Types, Sources and Volumes

The waste types and volumes handled at the facility are included in the Part A Application (see Section A). In general, Veolia accepts all RCRA (40 CFR Part 261 Subpart D and 15A NCAC 13A .0106) listed and characteristic hazardous wastes, as well as non-hazardous solid wastes. Wastes generally fall into two broad categories: (1) packaged laboratory chemicals (labpacks) and (2) containerized liquids and solids. Acceptable container sizes range from small fiberboard containers, 55-gallon drums, intermediate bulk containers (IBCs), roll-off boxes, to cargo tanks.

Labpacks are DOT specification drums or boxes holding inside containers of waste chemicals, chemical compounds and samples. Sufficient absorbent material is placed in each outside container to surround the inner receptacles and totally absorb the liquid content of the inside containers in the event of damage or breakage. A significant quantity of the wastes Veolia manages is packaged laboratory chemicals.

Overall Veolia services all types of industries including Fortune 500 companies in research and development, pharmaceutical and general manufacturing industries as well as educational institutions, hospitals, government agencies and homeowners. Veolia presently services the environmental management, consulting, and technical needs of more than 100 clients in North Carolina.

Section C

Waste Characteristics

(§264.13(a) and §270.14 (b)(2))

The operations at the Veolia facility involve the shipping, receiving, storage, and consolidation of certain hazardous and non-hazardous wastes. The activities conducted include the storage of DOT acceptable waste containers in trailers prior to shipment off-site to an ultimate disposal facility, the bulking or consolidation of compatible solid non-hazardous and hazardous wastes into roll-off boxes or similar units, the repackaging of labpacks without commingling the contents of the inside containers, and the pouring up or consolidation of compatible liquid and solid wastes (including the inside containers of labpacks) into larger containers ranging from 55-gallon drums to cargo tanks.. The wastes are stored in various units, (e.g., trailers, roll-off boxes, cargo tanks, etc.), within secondary containment until they are ready for shipment off-site. The time waste materials are stored on-site varies depending on the physical and chemical nature of the wastes, but in most cases does not exceed three months.

I. General Description of Waste

The materials that Veolia manages generally fall into two broad categories: (1) packaged laboratory chemicals and (2) containerized liquids and solids. Packaged laboratory chemicals (labpacks) are DOT acceptable drums or cartons containing inside packages of waste chemicals, chemical compounds and samples. These chemical bottles are packaged in enough compatible absorbent material (e.g., vermiculite, and sawdust) to absorb all the liquids contained in the inside packages. The total quantity of material within a lab pack is normally 12 gallons or less (or the volumetric equivalent). For containerized liquids and solids, the container sizes range from 5-gallon pails to 7,000-gallon cargo tanks for liquids and up to 30-cubic yards for solids. The majority of wastes handled by Veolia at this facility are packaged laboratory chemicals.

II. Hazardous Characteristics

Within these two general waste categories, Veolia manages all RCRA hazardous wastes including: characteristic wastes (ignitable, corrosive, reactive, and toxicity), hazardous wastes from non-specific sources, hazardous wastes from specific sources, discarded commercial chemical products, off-specification commercial chemical products, container residues and spill residues. These materials are listed by EPA waste code in Section A of this document (Part A - application). Veolia will satisfy all permit modification procedures prior to accepting any additional waste types that become listed in 40 CFR Part 261 or 15A NCAC 13A .0106 of the North Carolina Hazardous Waste Regulations. In addition to storing the aforementioned wastes, Veolia has the capability to commingle compatible solid and liquid non-hazardous and hazardous wastes to facilitate the ultimate treatment and disposal of these wastes off-site at pre-approved and fully permitted treatment and disposal facilities. Hazardous wastes that are commingled are also identified in Section A of this document (Part A Application).

III. Basis for Hazard Designation

Veolia services all types of industries including Fortune 500 companies, R & D facilities, pharmaceutical and general manufacturing facilities as well as educational institutions, hospitals, government agencies and homeowners. Due to this varied clientele and diverse waste generating processes, Veolia has the potential to manage all RCRA hazardous wastes as listed in Section A.

IV. Laboratory Report on Analysis Results

Veolia performs the following review and waste identification procedure prior to the acceptance of any new waste stream.

A. All Wastes Excluding Pack Labs

<u>Initial Review</u>

The waste analysis begins with an interview between a Veolia technical or customer service/sales representative and an authorized representative of the generator. During the interview, the processes generating wastes are reviewed in detail to determine waste types and characteristics. The process review includes a review of raw materials used at the facility in order to determine the proper waste classification. Alternatively, in the case of third party wastes accepted at the facility, this waste classification information is obtained by the company (i.e., broker or waste management company) responsible for delivering the waste to the facility.

Waste Identification

After the initial review, the generator, third party company (e.g., broker), or other entity, (such as another waste management company), responsible for shipping the waste to the facility is required to complete a Waste Information Profile Sheet (WIP) (See attachment C-1). The parameters that are identified as part of the WIP form include the following: halogens, presence of layers, percent solids, color, odor, physical state, viscosity, pH, specific gravity, flash point, hazardous characteristics, and chemical composition. The composition of the waste is detailed in Section 7 of the WIP, entitled "Chemical Composition". Here all of the hazardous and non-hazardous chemical constituents present in the waste are listed, along with their corresponding percentage make-up in the waste (the percentage is either exact or in the form of a range). The total of all constituents listed in Section 7 equals or exceeds 100%. Some examples of the constituents that may be listed in Section 7 include metals, cyanides, sulfides, PCB's and phenolics.

The WIP also requests information to determine if the waste is subject to specific regulatory standards, such as the Benzene Waste NESHAP or 40 CFR 264 Subpart CC. The rationale for selecting these parameters is that they are necessary to properly classify the material by EPA, NCDEQ, and DOT regulations, as well as to meet the waste analysis criteria of the ultimate disposal facilities. The generator uses his knowledge of the waste, taking into consideration materials or processes used, or any analytical results

from testing the waste when completing the waste information profile. This information is used to determine the proper EPA or state waste classification (i.e., is the material a listed or characteristic waste).

With regards to the Land Disposal Restriction (LDR) standards, the WIP is also used to record key information to allow for the proper completion of a LDR notification or certification form at the point of shipment of the waste. The LDR related information documented on the WIP includes the RCRA waste codes, the presence of any underlying hazardous constituents (UHCs), designation of the waste as a wastewater or nonwastewater, and any applicable waste code subcategories. This information is found in Sections 5 and 7 of the WIP.

After the WIP is completed, it is reviewed by a Veolia representative to determine if sufficient information exists to properly classify the waste and also manage it safely. If insufficient or inconclusive information exists, a sample of the material is collected at the generator's site using approved sampling methods and submitted to an approved commercial laboratory or to the ultimate disposal facility for analysis. Sampling and analysis will be conducted in accordance with EPA publication SW-846, entitled *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods*. SW-846 is EPA's official compendium of analytical and sampling methods that have been evaluated and approved for use in complying with the RCRA regulations.

All completed WIPs and any supporting analytical results are maintained in files at the Veolia facility, or another off-site location. Regardless of the location of storage of the information it will be readily accessible to Veolia personnel and NCDEQ representatives. WIP information maintained off-site will be readily accessible via fax or other electronic means.

B. Labpacks

Based on Veolia's experience, approximately 80% of the labpack chemical waste is in its original container displaying the original manufacturer's label and therefore, based on the availability of this information, no analysis is necessary or required to properly identify the waste material. Any container without a manufacturer's label requires positive identification by the generator prior to being packaged and transported off-site by Veolia. In the case where the lab pack wastes can not be identified, it is the generator's responsibility to have the waste analyzed using SW-846 methodology. At a minimim, Veolia assures sufficient analysis or information has been obtained from the generator to safely store and, if necessary, treat (i.e., consolidate) the waste at the Veolia facility prior to subsequent shipment of the waste off-site to a pre-approved, fully permitted TSDF.

V. Containers

Veolia takes the following precautions to prevent reactions that could threaten human health or the environment:

A. Compatibility of Waste with Container

When packaging wastes, Veolia uses containers that are made of or lined with materials that will not react with and are otherwise compatible with the hazardous wastes to be transported and stored. Furthermore, incompatible wastes are not placed in the same container. Therefore, the ability of the container to safely contain the waste will not be impaired. Veolia field personnel ensure the compatibility of the waste with the container during the packaging of the waste material on the generator's site. In cases where wastes are delivered to the facility directly by the generator or via a third party company, Veolia facility personnel inspect the containers at the time of receipt to verify the packaging is appropriate. Regardless of who completes the packaging of the waste, Veolia assures that all materials are packaged according to the Department of Transportation (DOT) packaging requirements in DOT acceptable containers prior to acceptance at the facility.

B. Containment

The facility is designed with a secondary containment system consisting of a concrete base and trench system with sufficient capacity to contain a minimum of 10% of the maximum volume of containers, or the volume of the largest container, whichever is greater. The containment system in the SE quadrant allows the facility to safely store up to a 7,000-gallon cargo tank in this quadrant.

On each side of the loading dock, the concrete containment base slopes 1% away from the dock towards a trench. A four-inch wide separation curb divides the base on each side of the dock into two distinct sections. Similarly, the two containment trenches are divided into two separate sections by a 6" valve that normally remains in the closed position. This system design results in four independent containment systems that allow for the separation of incompatible wastes (See Attachment A2). Materials that are incompatible with each other, as defined by DOT's Segregation Table for Hazardous Materials in 49 CFR §177.848 (modified as requested by NCDEQ to also require the separation of acids and bases) are stored in units (e.g., trailers, roll-offs, cargo tanks, etc.,) that are parked in separate containment sections. Therefore, in the unlikely event that two containers holding incompatible wastes leak simultaneously, there would be no commingling of incompatible materials. An in-depth description of the containment system can be found in Sections J and P.

C. Container Management Practices

In order to ensure container integrity and to protect human health and the environment, the following container management procedures are employed:

At the generator's site prior to shipment, Veolia personnel inspect each container making certain there are no leaks, ruptures or other defects that diminish the ability of the container to hold its contents. DOT authorized containers are used to ensure the compatibility of the container construction materials with the waste. If a container

holding hazardous waste is not in good condition or if it begins to leak, Veolia personnel will transfer the waste from the defective container to a container that is in good condition, place the defective container into a salvage drum, or manage the waste in some other way that complies with the North Carolina Hazardous Waste Regulations. A ready supply of clean, empty containers and other emergency response equipment accompanies Veolia field personnel to each generator's site where services are performed.

Hazardous wastes are transported to the facility by properly licensed, permitted transporters. Upon arrival at the facility, each container is again inspected to ensure container integrity. This inspection is performed by facility personnel who also check to ensure the containers are properly marked and labeled, as well as listed on the manifest. If a container holding hazardous waste is not in good condition, or if it begins to leak, facility personnel will transfer the hazardous waste from the defective container to a container that is in good condition, place the defective container into a salvage drum, or manage the waste in some other way that complies with the North Carolina Hazardous Waste Regulations. Containers remain closed except when it is necessary to sample or visually inspect container contents, or to conduct waste transfer operations.

Container and material handling is performed either manually, or with the use of equipment such as drum dollies, pallet jacks, or forklifts, depending on the container size and weight. All personnel involved with waste handling at the facility are trained in proper handling procedures. No containers are opened, handled, or stored in a manner that may rupture the container or cause it to leak.

Facility personnel inspect the container storage areas on a daily basis. The inspection is recorded on an inspection form (see Section F) and the following noted:

- leaks or deterioration of containers caused by corrosion or other factors
- open containers
- swollen or bulged containers
- improperly marked containers
- unidentified containers

- spills in the containment system
- cracks, gaps or corrosion of concrete pad and trench (inspected on a weekly basis)

In response to any identified deficiencies, remedial or corrective actions are performed and recorded. Remedial or corrective actions include, but are not limited to:

- transferring material to another container;
- placing the leaking or corroded container into a larger container;
- closing the container;
- relieving pressure in the container by carefully opening the container;
- properly identifying and/or marking the container;
- remediating any spilled material using absorbents, pads, etc; and
- sealing cracks, gaps or repairing corroded areas.

Attachment C-1

WASTESTREAM INFORMATION PROFILE

☐ Recertification Disposal Code _____

Veolia ES LOCATION
☐ Invoice Address
☐ Manifest from – blank if direct

ADDRESS _____ CITY _____ ST _____

Veolia ES TSDF requested _____ Technology requested _____ Generator No. _____ **Generator EPA ID No.** _____

1. **Generator Name** _____ **Generator State No.** _____ _____
Address _____ **State Wastestream No.** _____
City _____ **State** _____ **Country** USA **ZIP** _____
NAICS (SIC) Code _____ _____ _____ **Source** _____ **Origin** _____ **Form** _____ **System Type** _____

2. **Waste Name** _____ **Lab or Waste Area** _____
3. **Process Generating Waste** _____
4. **Shipping Name** _____
Hazard Class _____ **UN/NA No.** _____ **PG** ___ **RQ amt** _____ **lb**

RQ Desc:	1.	2.
DOT Desc:	1.	2.

5. **Waste Codes** _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____

Wastewater ☐ **Non Wastewater** ☐ **Sub Category** _____

6. **Physical and chemical properties** (*check all that apply*)

pH
a ☐ < 2
b ☐ 2 - 5
c ☐ 5 - 9
d ☐ 9 - 12.5
e ☐ > 12.5
_____ exact

Specific Gravity
a ☐ < .8
b ☐ .8 - 1.0
c ☐ 1.0
d ☐ 1.0 - 1.2
e ☐ > 1.2
_____ exact

Flash Point (F)
a ☐ < 80
b ☐ 80 - 100
c ☐ 101 - 140
d ☐ 141 - 200
e ☐ > 200
f ☐ no flash _____ exact

Solids
_____ % suspended
_____ % settleable
_____ % dissolved
Free Liquid Range ___ to ___ %

_____ % ash
_____ water solubility
_____ BTU/lb

Physical State
s ☐ solid
m ☐ semi-solid
l ☐ liquid
p ☐ pumpable semi-solid
f ☐ flowable powder
g ☐ gas
a ☐ aerosol
r ☐ pressurized liquid
d ☐ debris per 40 CFR 268.45
h ☐ sharps

Hazardous Characteristics
a ☐ air reactive
w ☐ water reactive
c ☐ cyanide reactive
f ☐ sulfide reactive
e ☐ explosive
o ☐ oxidizing acid
p ☐ peroxide former
r ☐ radioactive or NRC regulated
s ☐ shock sensitive
t ☐ temp sensitive
m ☐ polymerization/monomer
n ☐ OSHA carcinogen
I ☐ infectious
h ☐ inhalation hazard Zone: _

Odor
a none ☐
b mild ☐
c strong ☐
describe _____

Halogens
Br _____ % Bromine
Cl _____ % Chlorine
F _____ % Fluorine
I _____ % Iodine

Layers:	**a ☐ multilayered:**	**b ☐ bi-layered:**	**c ☐ single phase:**
	Top Layer	Second Layer	Bottom Layer
Viscosity by Layer:	☐ high (syrup) ☐ medium (oil) ☐ low (water) ☐ solid	☐ high (syrup) ☐ medium (oil) ☐ low (water) ☐ solid	☐ high (syrup) ☐ medium (oil) ☐ low (water) ☐ solid

Color
_____
_____
_____

Used oil y/n _ **HOC <1000 ppm** ☐ **or > 1000 ppm** ☐

WIP No. _____

7. **Chemical Composition** [**M** = Marine Pollutant, **S** - Severe Marine Pollutant, **O** = Ozone Depleting Substance, **U** = Underlying Hazardous Constituent, **B** = Benzene NESHAP, **T** = TRI Chemical, **C = OSHA** Carcinogen]

	Constituents	Range	Units		Constituents	Range	Units

Total Composition Must Equal or Exceed 100%

Other:

8. Is the wastestream being imported into the USA? Yes ☐ No ☐
9. Does the wastestream contain PCBs regulated by 40CFR? Yes ☐ No ☐
   PCB concentration _____ppm
10. Is the wastestream subject to the Marine Pollutant Regulations? Yes ☐ No ☐
11. Is the wastestream subject to Benzene NESHAP? Yes ☐ No ☐
    If yes, is the wastestream subject to Notification and Control Requirements? Yes ☐ No ☐
    Benzene concentration _____ ppm
12. Is the wastestream subject to RCRA subpart CC controls? Yes ☐ No ☐
    Volatile organic concentration, if known _____ ppmw
    CC approved analytical method ☐ Generator Knowledge ☐
13. Is the wastestream from a CERCLA or state mandated cleanup? Yes ☐ No ☐

14. **Container Information** (*Identify UN container marking if known*)
    Packaging: **Bulk Solid** ☐ Type/Size: _____ **Bulk Liquid** ☐ Type/Size: _____ **Drum** ☐ Type/Size: _____
    Other _____
    Shipping Frequency: Units _____ Per Month ☐ Quarter ☐ Year ☐ One Time ☐ Other _____

15. **Additional Information**: _____

_____

_____

_____

_____

Is analytical or an MSDS available that describes the waste? Yes ☐ No ☐ If yes, please attach.

GENERATOR CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize sampling of any waste shipment for purposes of recertification.

_____ _____ _____

NAME (PRINT OR TYPE) **PHONE** **DATE**

_____ _____

SIGNATURE **TITLE**

FACILITY NOTIFICATION

If approved for management, Veolia ES has all the necessary permits and licenses for the waste that has been characterized and identified by this profile.

TSDF PROCESSING USE ONLY: PPE REQUIRED No _____ Yes _____ Describe _____

WIP No. _____

VEOLIA ENVIRONMENTAL SERVICES
WIP INSTRUCTIONS

Veolia ES requires completion of all sections of the Wastestream Information Profile (WIP). Sections not applicable to the wastestream must have N/A written in the space provided.

Documented WIP information is used to comply with TSDF Waste Analysis Plans, RCRA and DOT regulations, Emergency Planning and Community Right-to-Know Act (EPCRA), Pollution Prevention Act, Toxic Release Inventory Report and other regulatory and generator requirements.

MARINE POLLUTANT

- The wastestream is subject to the Marine Pollutant Regulations if:
    1. it is a bulk (>119 gallons) packaging with Marine Pollutant concentration $\geq$ 10% or Severe Marine Pollutant concentration $\geq$ 1%

       or
    2. it is non-bulk Marine Pollutant shipped by vessel (boat) in packages larger than 5 liters (liquid) or 5 kg (solid)

       or
    3. it is a non-bulk Severe Marine Pollutant, shipped by vessel (boat) in packages larger than 0.5 liters (liquid) or 0.5 kg (solid).

  Refer to the list of Marine Pollutants.

OZONE DEPLETING SUBSTANCE (ODS)

Refer to the list of Ozone Depleting Substances.

UNDERLYING HAZARDOUS CONSTITUENT (UHC)

Refer to the list of Underlying Hazardous Constituents (40 CFR 268.48)

BENZENE NESHAP

- The wastestream is subject to Benzene NESHAP notification and control requirements if it:
    1. contains > 10 ppm benzene, **and**
    2. is generated by a chemical manufacturing plant, petroleum refinery or coke by-product recovery plant, **and**
    3. the generator's Total Annual Benzene (TAB) is $\geq$ 10 Mg/yr

TRI CHEMICAL

- The wastestream is subject to Toxic Release Inventory Reporting if it contains a Section 313 Toxic Chemical and meets Qualifier requirements.

OSHA CARCINOGEN

- OSHA promulgated standards in 1974 to regulate the industrial use of 13 chemicals identified as occupational carcinogens. Exposures are to be controlled through the required use of engineering controls, work practices, and personal protective equipment, including respirators.
  See 29 CFR 1910.1003-1910.1016 for specific details.

RCRA SUB-PART CC CONTROLS

- Subpart CC Air Emission Control requirements apply to large quantity hazardous waste generators and to treatment, storage, and disposal facilities.
- Waste in containers greater than 0.1 cubic meters (i.e., 26.4 gallons) with greater than 500 ppm volatile organics are subject to this rule., unless otherwise exempted. Allowable controls include DOT approved containers, containers with an adequate cover and closure devices, and containers which operate with no detectable emissions (less than 500 ppm).

Section D

Waste Analysis Plan

(§264.13(b) and §270.14(b)(3))

The objective of the Veolia Waste Analysis Plan (WAP), which has been developed in accordance with 15A NCAC 13A.0109(c), is to establish the procedures to ensure sufficient information is known about the waste to enable Veolia to safely store and in certain instances, commingle the wastes, and for the ultimate disposal facility to properly treat and dispose of the material.

Veolia operates a commercial storage and treatment facility at the corner location of State Routes 1104 and 1106 near Butner, North Carolina. Materials will be packaged or quality controlled by Veolia field personnel, the generator, or by pre-approved third parties at the generator's site and then transported under manifest to the Veolia facility. After meeting Veolia's acceptability criteria, materials will be off-loaded onto a storage trailer or placed into another container, such as a roll-off box or cargo tank, prior to being transported off-site for ultimate treatment and disposal. The facility stores up to 1,600 55-gallon drums, or the volumetric equivalent, in DOT acceptable containers. No disposal operations will be conducted at the facility.

The Veolia Waste Analysis Plan (WAP) describes the screening and acceptance of all wastes that are to be received at the facility. Note that due to the unique nature of lab pack wastes, these are addressed separately in the WAP from other wastes streams. The overall WAP is structured as follows:

I. Waste Information Profile Completion and Waste Characterization
II. Pre-shipment Fingerprint Screening of Wastes
III. Quality Control Inspection upon Acceptance at Veolia
IV. Quality Control Inspections at the Ultimate Disposal Facility
V. Special Requirements for Lab Packs
VI. Special Requirements for Waste Shipments Not Prepared by Veolia
VII. Requirements for Wastes to be Consolidated at Veolia
VIII. Land Disposal Restrictions Considerations

IX. Compatibility of Wastes

X. Management of Non-conforming Wastes

XI. Periodic Review and Recertification of Wastestreams

I. Waste Information Profile Completion and Waste Characterization

The waste analysis procedure described in this section applies to all waste streams, other than lab packs, that have not previously been approved and accepted at the facility.

A. Initial Review of the Waste

The waste characterization procedure begins with an interview between a Veolia representative and an authorized representative of the generator. During the interview, the wastes and processes generating the wastes are reviewed in detail to determine waste types and characteristics. A review of the waste generating process details all raw material inputs into the waste in order to identify all possible hazardous constituents present in the waste and provide a proper waste classification.

B. Waste Profile Form Completion

After the initial review, the generator is required to complete a Waste Information Profile Sheet or an equivalent profile form (see Attachment C1 for an example). The parameters that are identified as part of the profile form are the following: halogens, presence of layers, percent solids, color, odor, physical state, viscosity, pH, specific gravity, flash point, hazard characteristics, and chemical composition. The composition of the waste is detailed in Section 7 of the profile form, entitled “Chemical Composition”. Here all of the hazardous and non-hazardous chemical constituents present in the waste are listed, along with their corresponding percentage make-up in the waste (the percentage is either exact or in the form of a range). The total of all constituents listed in Section 7 equals or exceeds 100%. Some examples of the constituents that may be listed in Section 7

depending upon the particular waste type include, metals, organic chemicals, as well as the concentrations of other components such as cyanides, sulfides, PCB's, and phenolics. The profile also requires the inclusion of regulatory applicability information such as if the waste is subject to EPA's Benzene Waste NESHAP, 40 CFR 264 Subpart CC, or TSCA PCB disposal requirements. This information is necessary to assure Veolia manages the waste in compliance with those standards.

The rationale for including these parameters described above on the profile form is that this information is necessary to properly classify, package, and safely manage the material in accordance with EPA, NCDEQ, and DOT regulations. Furthermore the chemical and physical properties of the waste must be known to select an appropriate off-site facility to recycle, treat or dispose of the waste. These same parameters are commonly required to be included on the waste profile sheets Veolia completes for the ultimate disposal facility to which wastes will be manifested.

In completing the profile form, the generator uses knowledge of the waste, taking into consideration materials or processes used, or analytical results of the waste. Generators having sufficent knowledge of the waste to fully complete the profile form are not required to analyze their waste. After the profile form is completed by the generator, it is reviewed by a Veolia technical representative to determine if the information provided by the generator is sufficient to properly classify and safely manage the waste.

During the waste identification process, should a generator have insufficient information or knowledge about the waste to complete the profile form then analysis of a representative sample of the waste will be completed by the generator using SW-846 sampling and analysis methodology. Veolia personnel may assist the generator with the required sampling and analysis of the waste upon request. The EPA publication SW-846, entitled *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods*, is EPA's official compendium of analytical and sampling methods that have been evaluated and approved for use in complying with the RCRA regulations. SW-846, which is available on-line at http://www.epa.gov/osw/hazard/testmethods/sw846/online/index.htm, provides

methods for the regulated community to use in responding to RCRA-related sampling and analysis requirements. The specific analysis to be conducted by the generator is dependent upon the nature of the insufficient or unknown consituents or properties of the waste. For example, liquid wastes suspected of being potentially ignitable will be analyzed using Method 1010A or Method 1020B to determine its flash point. EPA's SW-846 also contains the recommended sample containers, preservation methods, and maximum holding times based on the analysis to be conducted Samples collected by Veolia personnel will be accompanied by a properly completed chain of custody form when sent to an off-site commercial laboratory for analysis. Off-site laboratories following SW-846 QA/QC procedures will be selected and documentation of the appropriate QA/QC will be provided with the analytical results.

Once the process generating the waste and the chemcial and physical properties of the waste are accurately documented, the proper EPA or state waste classification is assigned (i.e., whether the material is a listed or characteristic waste). When fully complete, the profile form provides a detailed chemical and physical description of the waste and a record that the waste information has been certified by the generator.

C. Waste Approval Process

The completed profile and any associated analytical results are reviewed by facility personnel to ensure that the material can be properly stored and/or treated at the Veolia facility. The information on the profile form is then transferred onto a Waste Approval Form for the facility to which the waste will be sent for ultimate treatment or disposal. These forms, supplied by the ultimate disposal facility, are reviewed and approved in accordance with that facility's waste analysis plan requirements.

After an approval is obtained from the ultimate disposal facility, a waste approval code is assigned to the specific waste stream. No waste shipments will be accepted at the Veolia facility until which time an approval to accept the waste has been obtained at the ultimate disposal facility.

II Pre-Shipment Fingerprint Screening of Wastes

Veolia field personnel perform fingerprint sampling and analyses of wastes at the generator's site prior to shipment to the Veolia facility. However, in the limited instances where it is more expedient to perform fingerprint sampling and analyses away from the generator's site, Veolia personnel will perform fingerprint sampling and analysis at the Veolia facility on the loading/unloading dock or within the confines of the permitted hazardous waste storage area upon receipt of the waste.

The pre-shipment evaluation and analysis of the waste performed by Veolia personnel consists of a verification that the waste, the container type, and the required marking and labeling conforms to the waste information on the profile. Fingerprint analysis of a representative sample of the waste stream is performed by Veolia personnel as part of the facility's standard waste receiving and acceptance process. Fingerprint sampling and analysis is a relatively quick method to inspect and sample wastes with the intent of determining if the waste generally conforms to the waste profile information. It has been Veolia's experience that when wastes are found to be non-conforming and do not adhere to the profile information, they tend to have a discrepancy with one or more of the following parameters:

1. Layers
2. Physical state
3. Color
4. Viscosity
5. pH.

Therefore by verifying that the waste conforms to the profile information for these five parameters (i.e. key indicators), the chance of a non-conforming waste being shipped to Veolia is drastically reduced.

Veolia personnel are trained to conduct these tests as part of their routine training program. In order to ensure that representative samples are collected, Veolia uses sampling equipment and collection methods recommended in "Test Methods for Evaluating Solid Waste (SW-846)". Due to the rudimentary nature of the analysis grab samples are typically obtained using a coliwasa or drum thief for liquid or sludges, and a scoop or trowel for solids. After use, the sampling equipment is decontaminated using a laboratory detergent and rinsed with tap water prior to returning it to the field, otherwise it is properly stored prior to packaging for disposal.

The following procedure is used to ensure that a representative sample of each waste stream is collected:

1. For drum quantities less than ten (10), a minimum of two (2) drums are sampled.
2. For drum quantities greater than ten (10), ten (10) percent of the drums or three (3) drums, whichever is greater, are sampled.

The following waste streams are visually inspected, but are not subject to fingerprinting:

1. Waste streams of debris and debris mixtures as defined in 40 CFR 268.2 are visually inspected for conformance to the manifest and the profile.
2. Intact manufactured objects (e.g., batteries, electrical parts, mechanical devices, light bulbs, cologne bottles, etc.) are visually inspected for conformance with the manifest and the profile.
3. Controlled substances regulated by the Federal Government that are generated from DEA and other law enforcement drug raids, provided the containers of controlled substances have never been opened previously (i.e., unused).
4. Waste received from Federal, State, or local government agency-authorized household waste collections.
5. Discarded, unused, commercial products (e.g., paints, over-the-counter consumer products, pharmaceuticals) in the original manufacturers container(s) (i.e., cans, pails, bottles, boxes, etc.) or in outer commodity boxes or containers which contain multiple inner smaller packages (i.e., cans, bottles, jars, etc.) of the same product in the original

manufacturers packaging. Such waste streams may be generated due to expired shelf life, product recalls, or other such circumstances where the nature and consistency of the specific product is known and documented.

Fingerprint analysis is performed for the five parameters as follows:

1. Layers – a visual observation of the presence of one or more layers.
2. Physical State – the physical state of each layer is visually determined.
3. Color – the color of the waste is visually determined.
4. Viscosity – the viscosity is approximated based on visual observation as low, medium or high.
5. pH – the pH is determined through the use of pH test strips.

All fingerprint test results are documented and compared to the information on the profile to confirm the analytical results of the waste to be shipped is consistent with the profile information. Any differences between the sampling results and the corresponding profile information must be reconciled with the generator. The following discrepancies will require resolution with the generator prior to shipment or acceptance of the waste at the Veolia facility:

1. Layering – the presence of more or less layers than indicated on the profile.
2. Physical state – the presence of a different physical state then indicated on the profile.
3. Color – significant differences in color, such as green when the waste is profiled as being clear. Slight shades or tone differences are not considered to be significant.
4. Viscosity – significant differences in viscosity such as low when it is profiled as a high viscosity material.
5. pH – recorded pH that is outside of the range of the pH that is indicated on the profile.

The documented results of the fingerprint sampling accompany the manifest with the waste shipment.

III Quality Control Inspection Upon Acceptance at Veolia

A quality control check is conducted when the materials arrive at the Veolia facility. At the facility, the manifest is reviewed to ensure that it has been properly completed. In addition, the containers are inspected visually for damage or leaks that may have occurred during transportation. If the material is deemed to be acceptable, it is off-loaded onto a trailer designated for the disposal facility or onto a trailer used for storage only. Alternatively, if the materials meet the facility's treatment compatibility criteria described in Section D.VII, the materials may be consolidated or transferred into a roll-off box, cargo tank or similar unit. Any wastes determined to be non-conforming to the waste profile are managed as described in Section X.

IV. Quality Control Inspections at the Ultimate Disposal Facility

The final procedure prior to disposal is the quality control activity at the ultimate disposal facility to which Veolia ships the waste. The quality control process is conducted in accordance with the permit requirements of the disposal facility. Sampling, analysis, or other physical tests are completed to assure consistency with the original information submitted. Wastes found to be inconsistent will be rejected and returned to the facility.

V. Special Requirements for Lab Packs

Labpacks are DOT specification drums or boxes holding inside containers of waste chemicals, chemical compounds and samples. Enough absorbent material is placed in each outside container to absorb the liquid contents of the inside container in the event of container damage. The total quantity of material within a lab pack is normally 12 gallons or less (or the volumetric equivalent). All labpacks will be packaged by Veolia personnel or qualified third party companies.

Veolia has developed standard operating procedures for the characterization, segregation, identification, packaging, transportation and disposal of labpack chemicals. These procedures have been developed to provide the generator, transporter and disposal sites with the maximum

assurance that the waste is packaged in accordance with all applicable regulations and to assure that no compatibility problems occur.

Based on Veolia's experience, approximately 80% of the labpack chemical waste is in its original container with the original manufacturer label. If the manufacturer label is not on the container, Veolia will require that the generator analyze or positively identify the material before it can be removed from the generator's site. Each labpack container will be marked and labeled in accordance with all EPA, NCDEQ and DOT requirements. The regulations require that the materials are packaged with sufficient absorbent to resist shock and to absorb liquid spillage in the event of container damage. All inside and outside containers must conform to the regulatory requirements detailed in 40 CFR §264.316 and 49 CFR §173.12 (b).

All materials are subject to a quality control check when they arrive at the Veolia facility. At the Veolia facility, manifests and associated paperwork are reviewed to ensure they are properly completed. In addition, the outside of the containers are visually inspected for signs of leakage or deterioration, or any condition that could cause them to fail during handling and storage. Any lab packs observed to be damaged, leaking, or have signs of leakage, will be repackaged into an appropriate container. Upon acceptance, the containers are off-loaded onto the loading dock and directed into a trailer designated for the proper disposal facility or into a trailer used for storage only. Lab pack containers are often temporarily staged on the loading dock in order to be palletized and stretch wrapped prior to being placed within a trailer. Containers holding hazardous wastes will always remain closed on-site except to take samples perform corrective action, repackage, or commingle compatible wastes.

Lab pack containers are not subject to the Pre-shipment Fingerprint Screening described in Section II. The final quality control point for lab packs is at the ultimate disposal facility, where the incoming shipments are again evaluated in accordance with its Waste Analysis Plan.

VI. Special Requirements for Waste Shipments Not Prepared by Veolia

Veolia occasionally accepts containerized waste shipments directly from generators without the involvement of Veolia field personnel in the pre-shipment activities. In addition, Veolia occasionally accepts containerized waste from third party companies (e.g. other waste management, environmental services companies, or brokers) that conduct similar operations to Veolia, that is, they make arrangements with various generators to manage their wastes on a periodic basis. Similar to Veolia, this involves the packaging, preparation for transport, and transport of the wastes to a designated treatment and disposal facility. Before these wastes are received at the Veolia facility, the generator (for direct shipments) or third party company completes a profile for each wastestream that contains the same information specified in Section I above (see Attachment C1), and is reviewed and updated at the same frequency specified in Section XI. Completion of the profile provides the detailed physical and chemical analyses to allow Veolia to safely manage the wastes.

Upon receipt, the containers are off-loaded and inspected as described above to ensure the containers are not leaking and are in acceptable condition to safely store or otherwise manage. A fingerprint sample is collected from each wastestream using the same procedure and sampling frequency as specified in Section II. This analysis is used to confirm that the wastestream described on the profile conforms to the wastestream delivered to the facility. If the containers are in acceptable condition, the wastestream conforms to the profile, and the accompanying paperwork has been completed correctly, Veolia accepts the wastes and manages the wastes accordingly. Problems identified during the waste receipt and acceptance process are managed in accordance with the description for managing non-conforming wastes in Section X.

VII. Requirements for Wastes to be Consolidated at Veolia

Compatible liquid and solid hazardous and non-hazardous wastes may be combined or consolidated to reduce transportation costs off-site and maximize packaging efficiencies. As required, the hazardous wastes that are consolidated are designated in the facility's Part A application. Container sizes and types for consolidation vary, but will normally not exceed 55

gallons, and could include labpack wastes and single containers. (Note: the repackaging of labpack wastes from one container to another without consolidating (i.e. without pouring) of the contents of the inside containers are also conducted, but since the contents of the inside containers are not commingled, it is not considered treatment and is not subject to the requirements described in this section).

The primary risk inherent in consolidation operations is the inadvertent combination of incompatible wastes. Combining incompatible wastes could result in the evolution of heat, the release of toxic gases, or even fire and explosion. Veolia recognizes these hazards and understands that appropriate controls must be established to prevent the occurrence of these types of incidents. First, only those wastes designated for treatment in the facility's Part A application will be consolidated. These wastes are relatively stable and are not considered reactive. Second, facility personnel review the profiles associated with the wastes prior to consolidation to determine that the wastes as described are all chemically compatible with one another (i.e. all are flammable liquids) and a compatibility problem does not exist. Finally, a compatibility bench test is conducted to verify and confirm that the wastes are compatible with one another prior to performing the consolidation of the wastes.

The bench compatibility test will be performed by Veolia personnel at the Veolia facility. First, representative samples are collected from each waste container to be consolidated. Sampling will be performed by trained Veolia personnel in accordance with SW-846 methodology. Samples will be collected using a coliwasa or other appropriate sampling tool and placed in a compatible sample container, typically a wide-mouth glass jar with Teflon lined screw cap. Samples will be clearly marked to identify the container from which they were obtained.

The compatibility test consists of pouring a small representative sample of the first waste to be consolidated into a larger, empty "compatibility test" container. A small portion of the second waste stream is then added to the "compatibility test" container. The contents of the "compatibility test" container are mixed and then visually monitored for any incompatibilities. Incompatibilites noted include observed generation of heat, generation of fumes or off-gassing, bubbling or foaming, changes in physical state or the formation of solids. If no incompatibility is

observed then a portion of each successive waste stream will then be added to the "compatibility test" container one at a time and observed after each addition. If no incompatibility is observed the wastes are approved for consolidation. Should there be a incompatibility observed in the compatibility test container, all wastes that have been added to the container will be prohibited for consolidation.

Bench compatibility testing will be performed in a designated area of the facility equipped with adequate containment should a spill occur as well as fire extinguishers in case of an emergency. The area will be vented through air collection hoods or other similar means to provide a safe work environment.

VIII. Land Disposal Restriction (LDR) Considerations

Veolia has incorporated standard operating procedures into the waste approval process to ensure compliance with the Land Disposal Restrictions (LDRs). During the initial review between the generator and Veolia representative a WIP is completed for each waste stream. The LDR information on the WIP is used to determine whether the waste is subject to the LDRs. The vast majority of wastes managed by Veolia does not meet the LDR treatment standards and as a result requires further treatment. Based on this LDR information an LDR certification or notification form is completed by the Veolia field services technicians at the point of shipment of the waste from the generator's site. In the case where the waste is determined to meet LDR standards and can be land disposed without further treatment, the generator will sign an LDR certification form attesting to that fact. The LDR information on the WIP coupled with the LDR notification or certification form satisfies the requirements in 264.13(a)(1) in that it contains the necessary information to assure the waste is stored, treated, and disposed of in accordance with 40 CFR Part 268 . Since the Veolia facility does not conduct disposal operations, and since it does not conduct treatment operations that are intended to meet an LDR treatment standard, in all cases the LDR standards that apply to the waste at the original point of generation carry through the Veolia facility and on to the off-site treatment and disposal facility. This ensures that the waste is ultimately treated and disposed of in accordance with the applicable Land Disposal Restrictions. Finally, Veolia ensures that the requisite Land Disposal Restriction notice and certification information, as applicable, is provided and maintained in accordance with the

requirements of 40 CFR Part 268, as incorporated by reference in the North Carolina Hazardous Waste Regulations.

IX. Compatibility of Waste

Drums and containers used for transport and storage of the wastes are specified in the Department of Transportation Regulations (49 CFR) as acceptable for the hazardous material they contain. In addition, Veolia is conscious of waste and container compatibility issues and uses only those containers made of, or lined with, materials that will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the container is not impaired. Before a container is removed from the generator's site, it is physically inspected and must be found in good condition and free from severe rusting, apparent structural defects, seam breach and leaks.

X. Management of Non-conforming Wastes

Wastes, upon receipt and inspection at the Veolia facility, that have been determined to not conform to the information provided on the waste profile form and/or the information provided on the hazardous waste manifest, will be managed as non-conforming wastes. Non-conforming wastes for which there are manifest discrepancies will be managed in accordance with the requirements in 40 CFR 264.72, which may result in resolution of the manifest discrepancies or potentially rejection of the waste back to the generator or an alternate facility. In resolving the discrepancies it may be necessary for Veolia to further sample and analyze the non-conforming waste. Should sampling of the waste be necessary at the Veolia facility it will be completed as described below.

A. Sampling Methods and Analytical Methodology

Non-conforming wastes requiring additional characterization will be sampled within a trailer that is in the permitted storage area, or on the loading/unloading dock. Waste characterization samples that require quantitative and/or qualitative analysis are sent to an

appropriate off-site commercial laboratory. In order to ensure that representative samples are collected, Veolia will use sampling equipment methods recommended in "Test Methods for Evaluating Solid Waste (SW-846)". After use, the sampling equipment will be decontaminated or disposed of in accordance with accepted methods and applicable regulations.

1. Representative Sampling Technique

The following procedure will be used to ensure that a representative sample of each waste stream is collected:

(i) For a single wastestream where there are drum quantities of less than ten (10), a minimum of two (2) drums will be sampled.
(ii) For a single wastestream where there are drums quantities of greater than ten (10), ten (10) percent of the drums or three (3), whichever is greater, will be sampled.

All samples collected from off-site by Veolia personnel will be placed into wide-mouth sample bottles with tight, screw-type lids. Each sample will have a label attached to it with the following information: profile number, name of collector, date of collection and place of collection (generator name). The labels will be filled out at the time of collection. Samples will undergo analysis at an off-site commercial laboratory.

2. Analytical Methodology

The analytical methodology utilized by the commercial laboratory will be those methods specified in EPA's SW-846

XI. Periodic Review and Recertification of Wastestreams

Periodic review and recertification of the wastes that have been previously approved and received by Veolia is necessary to assure the waste continues to match the waste profile

information. Veolia provides field services to the majority of the generators shipping wastes to the Veolia facility and as a result is in regular contact with the generator as well as routinely on-site at the generator's facility. Through these close interactions, Veolia is able to regularly review the waste generating process and determine if there have been any notable changes in the process or constituents in the wastes. If it is determined that there is a change that could affect the waste type or characteristic, the waste stream will be considered a new waste and the procedure outlined in Section I will be followed to properly complete a new profile form.

Analysis of the waste will be performed as described in Section I whenever the waste generating process has significant changes that could impact the presence or quantity of constituents in the waste or the properties of the waste and the generator does not have adequate knowledge to accurately complete the profile.

In addition, a reevaluation of the profile form and waste approval will be repeated as follows:

1. Reevaluation will be annually for each wastestream received at the facility. On an annual basis, Veolia and the generator will complete a review of the profile forms and verify that the information regarding the waste generating process, constituents in the waste, and the chemical and physical properties of the waste remain unchanged. Sampling and analysis of the waste will be completed if as a result of the review the proper waste classification or waste constituents and properties cannot be determined.
2. The off-site disposal facility has received the waste and it is deemed to be non-conforming as described in Section X.

Section E

Security

(§264.14 and §270.14 b(4))

Veolia prevents unknowing entry and minimizes the possibility for unauthorized entry onto the active portion of the facility, which is defined as the contained, concrete area surrounding the loading dock and trailers. In order to achieve maximum protection, the security measures are extended to all areas within the facility boundary.

There are two (2) vehicle entrances to the facility; one for normal, everyday operational use and one used primarily in the event of an emergency. The entrance off SR 1106 (Will Suitt Road) is the main access drive for all vehicles entering and leaving the facility. This entrance is controlled with a 24' sliding gate constructed of chain-link fencing topped with razor wire. The exit off SR 1104 is designated primarily for emergency use only and is controlled with a 24' swing gate. A facility personnel entrance to the loading dock area is also available through an opening inside the rear of the adjacent Veolia warehouse. This entrance is limited to foot and forklift traffic. Both entrance drives and gates are identified on Site Drawings 1 and 2 (Attachment A1 and A2). Entrances remain locked during off-duty hours.

I. Barriers

Completely surrounding the facility is an 8' high chain-link fence made of 2" galvanized steel chain link, #9 wire gauge. This fence is topped with a galvanized barbed tape obstacle. The fence is identified on Site Drawings 1 and 2 (Attachment A1 and A2).

II. Security Procedures

During the normal operating hours of 8:00 a.m. to 5:00 p.m., the facility is secured in the following manner:

(a) Facility personnel are responsible for monitoring and controlling entry to the facility. Any unauthorized personnel are escorted from the premises immediately.
(b) Visitors, contractors and vendors are not allowed to enter the facility prior to receiving authorization from the Veolia administration/operations office.
(c) The facility is equipped with internal and external communication systems (telephone) which are used to report any upset conditions.
(d) All entrance gates and doors are securely closed and locked whenever the facility is left unattended.

During non-operating hours, entry to the facility is controlled as follows:

(a) All entrances of the facility are locked.
(b) All trailer doors are closed.

In addition, Veolia has developed a security plan that details all security procedures, guidelines, and training requirements (Attachment E1 - Confidential) to ensure the safety and security of employees, customers, and the general public when transporting and managing hazardous materials and hazardous wastes. This security plan serves as Veolia's USDOT Hazardous Materials Security Plan required in 49 CFR Subpart I. It also addresses compliance with USEPA regulations in 40 CFR 264 Subpart B regarding security for a permitted hazardous waste facility.

III. Warning Signs

"Danger - Unauthorized Personnel Keep Out" signs are posted at each entrance of the facility and at other locations, in sufficient numbers to be seen from any approach to the facility. The lettering is of a color contrasting with its background and is legible from a distance of at least 25 feet.

IV Facility Security and Surveillance to Comply with GS 130A-295.01(g)

Veolia maintains a security and surveillance system at the facility satisfying the requirements of GS 130A-295.01(g). Entry to the facility is controlled during normal business hours by Veolia personnel by monitoring access as described above. During non-business hours when the facility is unattended unauthorized entry is prohibited and detected through the use of extensive surveillance cameras, photo beams and an alarm system. The security system is monitored remotely 24 hours a day, 7 days a week by a third party security company.

The facility is also equipped with monitors to detect a discharge that could directly or indirectly cause a fire, explosion or release of hazardous constituents to the environment. Infrared hydrocarbon gas detectors are installed in areas surrounding the shipping and receiving area and provide detection of hydrocarbon vapors in lower explosive limits ranges. This system is monitored 24/7 remotely by a third party security company.

Section F

General Inspection

(§264.15 and §270.14(b)(5))

Veolia routinely inspects the facility for malfunctions and deterioration, operator errors and discharges that may cause or lead to a release of hazardous waste constituents to the environment or threaten human health.

1. General Inspection Schedule

Veolia follows a written inspection schedule for inspecting monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment to prevent, detect or respond to environmental or human health hazards. The inspection schedule details not only the frequency with which these inspections occur, but also the types of deficiencies that are looked for during the inspection. The general inspection schedules are maintained at the facility.

Per the general inspection schedule, two types of inspections are conducted at the facility. Veolia facility personnel perform daily inspections of all containers stored within the trailers, any spills or releases, the loading and unloading dock, and the integrity of concrete containment trenches and pads. Safety and emergency equipment, security devices and operational and structural equipment are inspected on a monthly basis. The results of each inspection are recorded on inspection log sheets (Attachments F1 and F2) entitled, “Veolia Daily Inspection Log” and “Veolia Monthly Inspection Log”. Information requested on the log includes the inspector’s name, the date and time of the inspection, items of inspection, status of item, observations, and the nature of any repairs and remedial actions conducted. The inspector checks the status of each item on the log sheet and indicates whether its condition is acceptable or unacceptable. If the status of a particular item is unacceptable, the nature of the remedial actions implemented to correct the problem is recorded.

II. Specific Inspection Schedules

Once during each operating day, inspections are performed on the containers, the container storage area, and the loading and unloading dock. The condition of containers are inspected to ensure that all containers are securely closed and that there are no containers leaking due to corrosion or pressure build-up. If there are containers in unacceptable condition, the contents of the container is transferred to another suitable container or the entire container is placed into a salvage drum. The waste storage and handling areas including the trailers, containment area, and loading and unloading areas are inspected daily for evidence of leaks. If any spills are observed, they are remediated as outlined in the Contingency Plan, and all clean up and spill materials are placed into a container for proper classification and disposal. The secondary containment system consisting of the concrete containment pads and trenches are inspected for cracks or corrosion on a daily basis. If cracks or corrosion are noted, they are sealed and repaired, as necessary.

III. Remedial Action Procedures

If inspections reveal that non-emergency maintenance is required for structures or equipment, the maintenance will be completed as soon as practicable to ensure that the deficiency does not lead to an unreasonable risk to human health or the environment. If there is an imminent hazard situation or an emergency underway, remedial action will be taken immediately, and Veolia will notify the appropriate authorities as required by the Contingency Plan. In the event of a release of hazardous constituents to the environment, efforts will focus on containing the hazard, remediating it and subsequently decontaminating the affected area.

IV. Air Emission Standards for Process Vents (RCRA Subpart AA) and Air Emission Standards for Equipment Leaks (RCRA Subpart BB)

The facility does not management waste management units subject to RCRA Subpart AA and BB air emission control requirements.

V. Air Emission Standards for Tanks, Surface Impoundments, and Containers (RCRA Subpart CC)

The facility complies with the RCRA standards in 40 CFR Part 264 Subpart CC – Air Emission Standards for Tanks, Surface Impoundments, and Containers. The applicability determination of the Subpart CC requirements is documented on the Waste Profile Sheet (refer to Section C). The following applies to containers holding hazardous waste where the volatile organic concentration is 500 ppmw or greater. Note, there are no tanks or surface impoundments at the facility. For containers that exceed 0.1m^3 capacity but less than 0.46 m^3 that are not emptied within 24 hours after the container is accepted at the facility, facility personnel visually inspect the closed container and its cover to check for visible cracks, holes, gaps, or other open spaces into the container. Containers used for the storage of hazardous waste at the Veolia facility meet the applicable USDOT regulations for packaging hazardous materials. If a defective container closure is detected, facility personnel repair the defect in accordance with the requirements described immediately below:

In the remote instance that a container remains at the facility for a period of one year or more, facility personnel will visually inspect the container and its cover and closure devices initially and thereafter, at least once every 12 months, to check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position. If a defect is detected, Veolia will repair the defect in accordance with the requirements described immediately below.

When a defect is detected for the container, cover, or closure devices, facility personnel will make first efforts at repair of the defect no later than 24 hours after detection, and repair shall be completed as soon as possible but no later than 5 calendar days after detection. If repair of a defect cannot be completed within 5 calendar days, then the hazardous waste shall be removed from the container and the container shall not be used to manage hazardous waste until the defect is repaired.

Transfer of wastes into and out of containers for the purposes of consolidation will be performed in accordance with the requirements in 264.1086(c)(3) to control air pollutant emissions. Additional Subpart CC compliance requirements for containers are addressed in Section P.

VI. Copy of Inspection Log

A sample of each inspection log sheet may be found in Attachments F1 and F2. After each inspection, the log sheet is maintained in a file in chronological order. The inspection logs are kept at the facility, as required, for a minimum of three years.

Attachment F1

VEOLIA ENVIRONMENTAL SERVICES

Daily Inspection Log **Week of: _____**

Inspection Item	M	T	W	Th	F
All containers closed?					
Minimum aisle space (18”) and maximum (7’) stacking height observed?					
Minimum spacing between trailers (24”)?					
Any containers leaking?					
Any containers excessively bulged or concaved due to pressure or vacuum?					
Any containers with excessive corrosion?					
All containers properly marked, identified and segregated?					
Integrity of Concrete Pads and Trench Drains?					
Sufficient Secondary Containment Available?					
Spills on loading and unloading dock, or secondary containment pad?					
Fire extinguishers in place and charged?					
Security controls (fence, locks, sign) intact?					
Name of inspector					
Date					
Time					

Note: Y – Yes N - No

If deficiencies were noted for any of the above, indicate date and type of corrective action/repair performed for each item:

_____

_____

_____

_____

_____

VEOLIA ENVIRONMENTAL SERVICES

Attachment F2

Monthly Inspection Log of Safety and Emergency Equipment

Month of: _____

External/Internal Communication (Fire Alarm, Telephone)	_____
Containment Valve in Closed Position	_____
Spill Response Equipment	
Absorbent (Vermiculite, speedi-dry, etc)	_____
Shovels, brooms, portable pump or sump pump	_____
Decontamination equipment (lime, detergents, cleaning solvents)	_____
Portable Fire Extinguishers	_____
Salvage Drums, other DOT containers	_____
Emergency Shower/Eyewash	_____
Personal Protective Equipment	
Eye protection, face shields	_____
SCBAs, respirators, cartridges	_____
Coveralls, gloves	_____
First Aid Equipment	_____
Drum Trucks and Pallet Jacks	_____
24 hour Surveillance System	_____

Note: Check mark indicates equipment is present and in acceptable operating condition. Deficiencies for the emergency equipment items listed above is either that it is out of stock or not operable. For the containment valve, the deficiency is that it is open.

If deficiencies are noted above, indicate date and type of corrective action/repair performed:

_____

_____

Name of Inspector: _____

Date:_____Time: _____

Section G

Preparedness and Prevention

(§264.30 - §264.37)

Veolia Environmental Services, L.L.C. (Veolia) is an environmental service firm specializing in hazardous waste management. The Veolia operations consist of the (1) short-term storage of hazardous waste containers prior to transportation off-site to permitted treatment and disposal facilities, and (2) the consolidation of compatible wastes to minimize transportation costs and maximize operational efficiencies.

Facility operations include quality control of incoming shipments, preparation for transportation of outgoing shipments, maintenance of safe facility conditions, orderly management of waste containers, and the repackaging and consolidation of compatible wastes.

The Veolia facility is designed, constructed, maintained and operated to minimize the possibility for fire, explosion, or any unplanned, sudden or non-sudden release of hazardous waste or hazardous constituents to the air, soil, or surface water which could threaten human health or the environment.

I. Internal and External Communications

The Veolia facility is equipped with communications systems capable of both (a) providing immediate emergency instruction to facility personnel and (b) summoning emergency assistance from local police departments, fire departments and state or local emergency response teams. The following systems are installed, maintained and operated in order to minimize the threat to human health and the environment.

(a) Telephone - Telephones located within the facility office provide direct contact between Veolia personnel and the local police department, fire department and emergency response companies. A telephone on the loading dock also provides contact with outside emergency and internal Veolia personnel. A listing of

emergency telephone numbers is conspicuously displayed in both the office and the loading dock for easy reference.

(b) Manual Pullbox - In the event of a fire or other serious emergency, two pullbox alarms are located on the loading dock. When pulled, the alarm sounds alerting facility personnel and building occupants of an emergency situation. This alarm is also monitored by an off-site company contracted by Veolia to alert the Butner Public Safety Division immediately in the event of an emergency.

(c) Voice Communication - Due to the relatively small size of the container storage, treatment and loading dock areas, and their immediate proximity to the office and warehouse, voice communication is likely the primary method to provide emergency instructions to facility personnel.

II. Fire fighting Equipment and Alarms

Automatic fire protection is provided for all trailers used for the storage of hazardous waste. Each trailer designated for storage only is provided with two dedicated heat actuated fire extinguishers. In addition, other trailers used for both transport and storage are equipped with two heat actuated fire extinguishers, one placed in the front and one in the rear, while they are parked on the loading dock and used for waste storage. In addition, portable hand-held fire extinguishers, both ABC and D type, are located on the loading dock. ABC extinguishers are located on each end of the dock and are spaced per NFPA requirements (approximately every 35 feet). Two (2) type D extinguishers are also available. In addition, a 150 lb. wheeled ABC type fire extinguisher unit is available within the adjacent warehouse, and is staged nearby when flammable liquids consolidation is performed in the loading dock area. All facility operations personnel have been instructed in the use of fire extinguishers to extinguish incipient stage fires.

III. Spill Control Procedures

Veolia maintains emergency response equipment on site and operations personnel are trained in emergency spill-response procedures. Spill control equipment is available on the loading dock or within the warehouse and includes absorbents (speedi-dry, vermiculite, etc.), absorbent pads and booms, portable pumps, shovels and DOT authorized packagings, including salvage drums. Lime for neutralization of corrosive, acidic materials in the event of a spill or leak is also available to facility personnel. Personal protective equipment such as chemical resistant coveralls, gloves and boots, self-contained breathing apparatuses (SCBAs), and air purifying, full-face respirators are maintained on-site and readily accessible.

IV. Decontamination Equipment

Basic work clothes consist of work shirts, pants, steel-toed shoes, safety glasses and leather or cotton gloves. In the event of worker exposure to hazardous materials, emergency decontamination of personnel is accomplished through the use of a safety shower/eyewash. Personal protective equipment (PPE) is selected based on the material's hazards. Emergency PPE available on the site includes self-contained breathing apparatuses (SCBAs), full-face respirators and cartridges, chemical protective clothing, boots and gloves. For the most part, PPE is disposable. All contaminated disposable PPE is containerized and shipped off-site for disposal in accordance with all EPA, NCDEQ and DOT regulations. Non-disposable items are decontaminated in accordance with the manufacturer's instructions.

V. Testing and Maintenance of Emergency Equipment

All facility communication or alarm systems, fire protection equipment, spill control equipment and decontamination equipment are tested and maintained as necessary to ensure proper operation in the event of an emergency. All inspections are performed according to the inspection schedule included in Section F. The results of all inspections and any corrective actions are recorded on the inspection Log sheets, Attachments F1 and F2. All fire protection and other emergency equipment is inspected monthly by designated personnel. In addition, fire protection equipment inspections and maintenance is performed by a fire protection services contractor on an annual basis.

VI. Water for Fire Control

Active fire hydrants are located on the adjacent SR 1104 (See Attachment A1, Site Drawing 1 for exact locations). Water is available at adequate volume and pressure to supply water hose streams for use in the case of a fire.

VII. Aisle Space Requirements

Sufficient aisle space is maintained to allow the unobstructed movement of personnel, fire protection equipment and/or spill control equipment to any area of facility operation in an emergency. A minimum of two (2) feet in distance is maintained between each trailer as outlined on Site Drawing 2 to allow for the movement of personnel between trailers to conduct routine inspections and address emergency situations and spills.

Management procedures and daily operating methodology regarding aisle space within the trailers is addressed below:

A. Wastes in Storage

Incoming containerized wastes is placed into a trailer designated for a particular disposal site or into a trailer used for storage only. Wastes are loaded from the front of the trailer to the back and a minimum of 18" aisle space is maintained between double rows of containers during the loading process.

Approximately 57 to 66 55-gallon drums (depending on the trailer size) can be loaded into a trailer before it is necessary to begin to fill (or eliminate) the aisle space. Once the 18" aisle space is no longer maintained in the trailers that are designated for authorized disposal facilities, the trailer is considered "prepared for transportation" and is managed in accordance with section VII. B. "Wastes Prepared for Transportation". The required aisle space is always maintained in the trailers that are used for storage only.

B. Wastes Prepared for Transportation

This section addresses the management of waste containers loaded in trailers that are "prepared for transportation" as described above. These trailer loads designated for off-site shipment are sent off-site within ten (10) working days after the date that 18" aisle space is no longer maintained in the trailer. The date that aisle space is no longer maintained in the trailer, referred to as the "accumulation start date", is posted near the rear of the trailer. For these containers all applicable EPA, NCDEQ and DOT information is readily available for review and could be used in the event of an emergency to properly assess the nature, hazards and quantity of the wastes.

VIII. Arrangements with Local Authorities

Veolia has made arrangements to familiarize police, fire departments and emergency response teams with the layout of the facility, properties of hazardous waste managed at the facility and associated hazards, places where facility personnel are normally working, entrances to and roads inside the facility, and possible evacuation routes. Veolia has also familiarized the local hospital with the types and hazards of the wastes handled and the types of injuries or illnesses that could result. Veolia has also developed agreements with emergency response contractors and equipment suppliers.

Specifically, Veolia has emergency agreements with the local authorities including the Butner Public Safety Division (police/fire departments), Granville County (sheriff, fire department and health department), NC Highway Patrol, Duke University Medical Center, and an emergency response contractor. These agreements are found in Attachment G1 and G2.

Attachment G1
Sample Letter sent to Local Authorities
(NCGS 130A-295(d)

April 22, 2016

Ms. Lisa M Harris
Director
Health Department of Granville County
PO Box 367
Oxford, NC 27565

RE: Veolia ES Technical Solutions, L.L.C. Contingency Plan Notice

Dear Ms. Harris:

Veolia ES Technical Solutions, L.L.C. (Veolia), located at 2176 Will Suitt Road in Creedmoor, NC, is the owner and operator of a storage and transfer facility for hazardous wastes. This facility has been issued a hazardous waste management permit by the North Carolina Department of Environment and Natural Resources (NCDENR). Veolia is in the process of applying for the renewal of this permit and is required by certain provisions of Session Law 2007-107, as amended by Session Law 2007-495, to provide contingency planning information to the county and local municipality having jurisdiction over the facility, and all emergency response agencies that have a role under the contingency plan for the facility. This notice is being provided to you in accordance with the applicable NCDENR regulations in N.C.G.S. 130A-295(d) and contains important contingency planning information for your review.

In preparation of an emergency event, Veolia has developed and implemented a comprehensive emergency response and contingency plan. This plan has been approved by the North Carolina Department of Environment and Natural Resources (NCDENR) and the Local Emergency Planning Commission (LEPC). A copy of the Veolia contingency plan is included with this letter for your review. The plan details the response actions that will be carried out immediately in the case of a fire, explosion, or release of hazardous waste constituents which could potentially threaten human health or the environment. Also included as an addendum to the plan are site maps indicating the location of the hazardous waste storage areas in the facility.

Please note that in accordance with N.C.G.S. 130A-295(e), within 60 days of receiving this information, a written response shall be provided to the facility operator as to the adequacy of the contingency plan and the associated resources and equipment necessary to respond to an emergency at the facility with respect to your role as identified in the plan. To assist you with documenting your response, we have prepared the attached form, titled, “Contingency Plan Local Authority Arrangement”, for you to complete and return to Veolia.

Should you have any questions regarding Veolia’s emergency response plans for this facility and your role in responding to an incident please contact Mr. J Beck, Veolia Facility Inventory Control Manager at (919) 528-3996 x140 or Mr. John Dyer, Veolia Environmental, Health and

Attachment G1
Sample Letter sent to Local Authorities
(NCGS 130A-295(d)

Safety Manager at (215) 416-6527. We greatly appreciate your attention to this matter and providing a timely response to Veolia.

Sincerely,

Thomas M. Baker
Director, Environment and Transportation
Veolia ES Technical Solutions, L.L.C.

Veolia
2176 Will Suitt Road
Creedmoor, NC 27522

Attachment G1
Sample Letter sent to Local Authorities
(NCGS 130A-295(d)

Description of Veolia Facility Operations

Veolia is an environmental services company that conducts waste management operations at the corner location of State Routes 1104 and 1106 (Will Suitt Road and East Lyon Station) in Butner, North Carolina. The mailing address of the facility is 2176 Will Suitt Road, Creedmoor, NC 27522. Veolia specializes in the packaging, handling and transportation of hazardous and non-hazardous waste. In providing these services, hazardous and non-hazardous wastes are temporarily stored at this location while awaiting transportation to an off-site destination recycling, treatment or disposal facility. Treatment or disposal activities are not performed at this Veolia facility.

All waste materials received and placed into storage are packaged in appropriate containers as prescribed by federal and state regulations. Temporary storage of containerized wastes occurs in trailers parked at a loading dock located in the rear of our facility. The loading dock area can accommodate up to 20 trailers and is designed with a secondary containment system to prevent the escape of waste materials into the environment in the event of a release. The facility also meets the established federal and state standards for security and fire prevention.

The types of wastes managed at this Veolia facility generally fall into two broad categories: (1) packaged laboratory chemicals and (2) containerized liquids and solids. Some of these wastes are classified as hazardous waste due to the chemical properties they exhibit (ignitable, corrosive, reactive, or toxic) or because they meet a specific listing according to the regulations. Some examples of the common wastes managed by Veolia that are generated by local businesses include discarded paints, cleaning solutions, batteries, mercury-containing lamps, and off-specification industrial or consumer products. Additional details on the properties of the wastes managed by Veolia are included in the facility's permit application and will be made available upon request.

Attachment G-2

VEOLIA
ENVIRONMENTAL SERVICES

CONTINGENCY PLAN LOCAL AUTHORITY ARRANGEMENT

Submitted to:
Mr. Doug Logan
Fire Marshall and LEPC
Granville County Fire Marshall
5650 Cornwall Road / PO Box 598
Oxford, NC 27565

Submitted by:
Veolia ES Technical Solutions, L.L.C.
2176 Will Suitt Road
Creedmoor, NC 27522

In accordance with federal regulations 40 CFR 264 Subpart D and North Carolina hazardous waste management regulations, 15A NCAC 13A.0109, Veolia has developed a Preparedness, Prevention, and Contingency Plan for the facility operations at 2176 Will Suitt Road, Creedmoor.

- In an emergency Veolia will dispatch the fire and police by dialing "911".
- Under the direction of the responding fire department Chief or designee, the Veolia staff will assist in the response activities whenever possible.

To acknowledge receipt and review of this facility contingency plan please sign and date this document in the space below and return to Veolia at the address shown above. In addition, as required by N.C.G.S. 130A-295, note below any special concerns or limitations regarding the adequacy of your resources and equipment to respond to an emergency at this facility. Attach additional pages as necessary.

Please contact me at 215-416-6527 with any questions or comments.

Thank You.

Veolia ES Technical Solutions

John Dyer
Environmental, Health, and Safety Manager

Date: 4/12/16

Granville County

Doug Logan
Fire Marshall / LEPC

Date: 4/19/2016

My Profile Support Locations English Search or tracking number Subi

FedEx Shipping Tracking Manage Learn FedEx Office ® WENDY JONES

Delivered

Tracking No.or Nickname	Shipper city, state	Origin Terminal	Ship date	Status	Recipient city, state	Delivery date
776110237880	CREEDMOOR, NC	RALEIGH, NC	4/14/2016		ABBOTT PARK, IL	4/18/2016 8:33 am
776081500230	CREEDMOOR, NC	RALEIGH, NC	4/12/2016		BUTNER, NC	4/15/2016 12:16 pm
776081506032	CREEDMOOR, NC	RALEIGH, NC	4/12/2016		BUTNER, NC	4/15/2016 12:23 pm
776081549399	CREEDMOOR, NC	RALEIGH, NC	4/12/2016		DURHAM, NC	4/15/2016 10:39 am
776081616687	CREEDMOOR, NC	RALEIGH, NC	4/12/2016		OXFORD, NC	4/15/2016 3:11 pm

Delivered

Showing 5 of 5

776081616687

Ship date:
Tue 4/12/2016

Actual delivery:
Fri 4/15/2016 3:11 pm

VEOLIA ENVIRONMENTAL SERVICES
WENDY JONES
2176 WILL SUITT ROAD
CREEDMOOR, NC US 27522
919 582-3996

Delivered
Signed for by: R EDWARDS

DOUG LOGAN
GRANVILLE CO EMERGENCY MANAGEMENT
5562 CORNWALL RD
OXFORD, NC US 27565
919 603-1310

Travel History

Date/Time	Activity	Location
- 4/15/2016 - Friday		
3:11 pm	Delivered	OXFORD, NC
8:12 am	On FedEx vehicle for delivery	RALEIGH, NC
7:08 am	At local FedEx facility	RALEIGH, NC
- 4/14/2016 - Thursday		
8:21 am	At local FedEx facility	RALEIGH, NC
8:20 am	At local FedEx facility Package not due for delivery	RALEIGH, NC
7:09 am	At local FedEx facility	RALEIGH, NC
- 4/13/2016 - Wednesday		
8:30 am	At local FedEx facility	RALEIGH, NC
8:18 am	At local FedEx facility Package not due for delivery	RALEIGH, NC
8:17 am	At local FedEx facility Package not due for delivery	RALEIGH, NC
7:14 am	At local FedEx facility	RALEIGH, NC
- 4/12/2016 - Tuesday		
10:01 pm	At destination sort facility	RALEIGH, NC
9:34 pm	Left FedEx origin facility	RALEIGH, NC
4:21 pm	Picked up	RALEIGH, NC
7:30 am	Shipment information sent to FedEx	

Shipment Facts

Tracking number	776081616687	Service	FedEx Express Saver
Weight	0.5 lbs / 0.23 kgs	Delivery attempts	1
Delivered To	Receptionist/Front Desk	Total pieces	1
Total shipment weight	0.5 lbs / 0.23 kgs	Terms	Not Available
Packaging	FedEx Envelope	Special handling section	Deliver Weekday

VEOLIA
ENVIRONMENTAL SERVICES

CONTINGENCY PLAN LOCAL AUTHORITY ARRANGEMENT

Submitted to: Mr. Brindell Wilkins, Jr., Sheriff
Granville County Sheriff's Department
143 Williamsboro Street
Oxford, NC 27565

Submitted by: Veolia ES Technical Solutions, L.L.C.
2176 Will Suitt Road
Creedmoor, NC 27522

In accordance with federal regulations 40 CFR 264 Subpart D and North Carolina hazardous waste management regulations, 15A NCAC 13A.0109, Veolia has developed a Preparedness, Prevention, and Contingency Plan for the facility operations at 2176 Will Suitt Road, Creedmoor.

- In an emergency Veolia will dispatch the police by dialing "911".

To acknowledge receipt and review of this facility contingency plan please sign and date this document in the space below and return to Veolia at the address shown above. In addition, as required by N.C.G.S. 130A-295, note below any special concerns or limitations regarding the adequacy of your resources and equipment to respond to an emergency at this facility. Attach additional pages as necessary.

Please contact me at 215-416-6527 with any questions or comments.

Thank You.

Veolia ES Technical Solutions

John Dyer
Environmental, Health, and Safety Manager

Date: 4/12/16

Granville County

Brindell Wilkins Jr.
Sheriff

Date: 4/15/16

My Profile Support Locations English Search or tracking number Subi

FedEx Shipping Tracking Manage Learn FedEx Office ® WENDY JONES

Delivered

Tracking No.or Nickname	Shipper city, state	Origin Terminal	Ship date	Status	Recipient city, state	Delivery date
776081484560	CREEDMOOR, NC	RALEIGH, NC	4/12/2016		OXFORD, NC	4/15/2016 1:49 pm
776081536561	CREEDMOOR, NC	RALEIGH, NC	4/12/2016		DURHAM, NC	4/15/2016 1:42 pm

Delivered Showing 1 of 2

776081484560

Ship date:
Tue 4/12/2016

Actual delivery:
Fri 4/15/2016 1:49 pm

VEOLIA ENVIRONMENTAL SERVICES
WENDY JONES
2176 WILL SUITT ROAD
CREEDMOOR, NC US 27522
919 582-3996

Delivered
Signed for by: L. EPPS

GRANVILLE COUNTY SHERIFF
BRINDELL B WILKINS JR
143 WILLIAMSBORO STREET
OXFORD, NC US 27565
919 528-3996

Travel History

Date/Time	Activity	Location
- 4/15/2016 - Friday		
1:49 pm	Delivered	OXFORD, NC
8:21 am	On FedEx vehicle for delivery	RALEIGH, NC
7:08 am	At local FedEx facility	RALEIGH, NC
- 4/14/2016 - Thursday		
8:21 am	At local FedEx facility	RALEIGH, NC
8:20 am	At local FedEx facility Package not due for delivery	RALEIGH, NC
7:09 am	At local FedEx facility	RALEIGH, NC
- 4/13/2016 - Wednesday		
8:30 am	At local FedEx facility	RALEIGH, NC
8:18 am	At local FedEx facility Package not due for delivery	RALEIGH, NC
8:17 am	At local FedEx facility Package not due for delivery	RALEIGH, NC
7:14 am	At local FedEx facility	RALEIGH, NC
- 4/12/2016 - Tuesday		
10:01 pm	At destination sort facility	RALEIGH, NC
9:34 pm	Left FedEx origin facility	RALEIGH, NC
4:21 pm	Picked up	RALEIGH, NC
7:11 am	Shipment information sent to FedEx	

Shipment Facts

Tracking number	776081484560	Service	FedEx Express Saver
Weight	0.5 lbs / 0.23 kgs	Delivery attempts	1
Delivered To	Receptionist/Front Desk	Total pieces	1
Total shipment weight	0.5 lbs / 0.23 kgs	Terms	Not Available
Packaging	FedEx Envelope	Special handling section	Deliver Weekday

VEOLIA
ENVIRONMENTAL SERVICES

CONTINGENCY PLAN LOCAL AUTHORITY ARRANGEMENT

Submitted to:
Mr. Thomas S. Marrow
Town Manager, Town of Butner
205-West C Street
Butner, NC 27509

Submitted by:
Veolia ES Technical Solutions, L.L.C.
2176 Will Suitt Road
Creedmoor, NC 27522

In accordance with federal regulations 40 CFR 264 Subpart D and North Carolina hazardous waste management regulations, 15A NCAC 13A.0109, Veolia has developed a Preparedness, Prevention, and Contingency Plan for the facility operations at 2176 Will Suitt Road, Creedmoor.

- In an emergency Veolia will dispatch the fire and police by dialing "911".
- Veolia will inform the Town of Butner as necessary of any incidents involving the facility.

To acknowledge receipt and review of this facility contingency plan please sign and date this document in the space below and return to Veolia at the address shown above. In addition, as required by N.C.G.S. 130A-295, note below any special concerns or limitations regarding the adequacy of your resources and equipment to respond to an emergency at this facility. Attach additional pages as necessary.

Please contact me at 215-416-6527 with any questions or comments.

Thank You.

Veolia ES Technical Solutions

John Dyer
Environmental, Health, and Safety Manager

Date: 4/12/16

Town of Butner

Thomas Marrow
Town Manager

Date: 4-27-16

Delivered

Tracking No.or Nickname	Shipper city, state	Origin Terminal	Ship date	Status	Recipient city, state	Delivery date
776110237880	CREEDMOOR, NC	RALEIGH, NC	4/14/2016		ABBOTT PARK, IL	4/18/2016 8:33 am
776081500230	CREEDMOOR, NC	RALEIGH, NC	4/12/2016		BUTNER, NC	4/15/2016 12:16 pm
776081506032	CREEDMOOR, NC	RALEIGH, NC	4/12/2016		BUTNER, NC	4/15/2016 12:23 pm
776081549399	CREEDMOOR, NC	RALEIGH, NC	4/12/2016		[illegible]	4/15/2016 10:39 am
776081616687	CREEDMOOR, NC	RALEIGH, NC	4/12/2016		OXFORD, NC	4/15/2016 3:11 pm

Delivered

Showing 2 of 5

776081500230

Ship date:
Tue 4/12/2016

Actual delivery:
Fri 4/15/2016 12:16 pm

VEOLIA ENVIRONMENTAL SERVICES
WENDY JONES
2176 WILL SUITT ROAD
CREEDMOOR, NC US 27522
919 582-3996

Delivered
Signed for by: M.COOPER

TOWN MANAGER, TOWN OF BUTNER
THOMAS S MARROW
SUITE A
415 CENTRAL AVE
BUTNER, NC US 27509
919 528-3996

Travel History

Date/Time	Activity	Location
4/15/2016 - Friday		
12:16 pm	Delivered	BUTNER, NC
8:25 am	On FedEx vehicle for delivery	RALEIGH, NC
7:08 am	At local FedEx facility	RALEIGH, NC
4/14/2016 - Thursday		
8:21 am	At local FedEx facility	RALEIGH, NC
8:20 am	At local FedEx facility Package not due for delivery	RALEIGH, NC
7:09 am	At local FedEx facility	RALEIGH, NC
4/13/2016 - Wednesday		
8:30 am	At local FedEx facility	RALEIGH, NC
8:18 am	At local FedEx facility Package not due for delivery	RALEIGH, NC
8:17 am	At local FedEx facility Package not due for delivery	RALEIGH, NC
7:14 am	At local FedEx facility	RALEIGH, NC
4/12/2016 - Tuesday		
10:01 pm	At destination sort facility	RALEIGH, NC
9:34 pm	Left FedEx origin facility	RALEIGH, NC
4:21 pm	Picked up	RALEIGH, NC
7:10 am	Shipment information sent to FedEx	

Shipment Facts

Tracking number	776081500230	**Service**	FedEx Express Saver
Weight	0.5 lbs / 0.23 kgs	**Delivery attempts**	1
Delivered To	Receptionist/Front Desk	**Total pieces**	1
Total shipment weight	0.5 lbs / 0.23 kgs	**Terms**	Not Available
Packaging	FedEx Envelope	**Special handling section**	Deliver Weekday

VEOLIA
ENVIRONMENTAL SERVICES

CONTINGENCY PLAN LOCAL AUTHORITY ARRANGEMENT

Submitted to:

Ms. Lisa M. Harrison
Director
Health Department of Granville County
PO Box 367
Oxford, NC 27565

Submitted by:

Veolia ES Technical Solutions, L.L.C.
2176 Will Suitt Road
Creedmoor, NC 27522

In accordance with federal regulations 40 CFR 264 Subpart D and North Carolina hazardous waste management regulations, 15A NCAC 13A.0109, Veolia has developed a Preparedness, Prevention, and Contingency Plan for the facility operations at 2176 Will Suitt Road, Creedmoor.

- In an emergency Veolia will dispatch the fire, police, and medical assistance by dialing "911".
- Veolia will inform the Health Department of Granville County as necessary of any incidents involving the facility.

To acknowledge receipt and review of this facility contingency plan please sign and date this document in the space below and return to Veolia at the address shown above. In addition, as required by N.C.G.S. 130A-295, note below any special concerns or limitations regarding the adequacy of your resources and equipment to respond to an emergency at this facility. Attach additional pages as necessary.

Please contact me at 215-416-6527 with any questions or comments.

Thank You.

Veolia ES Technical Solutions

John Dyer
Environmental, Health, and Safety Manager

Date: 4/12/16

Health Dept - Granville County

Lisa M. Harrison
Director

Date: 4-14-16

7014 0340 0000 6351 0176

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Certified Mail Fee	$ 3.30
Extra Services & Fees (check box, add fee as appropriate)	
☑ Return Receipt (hardcopy)	$ 2.70
☑ Return Receipt (electronic)	$ 1.35
☐ Certified Mail Restricted Delivery	$
☐ Adult Signature Required	$
☐ Adult Signature Restricted Delivery	$
Postage	$ 1.36
Total Postage and Fees	$ 8.71

APR 12 2016
Postmark Here
USPS - 27509

(Lisa Harrison)

Sent To: Granville County Health Department
Street and Apt. No., or PO Box No.: PO Box 367
City, State, ZIP+4®: Oxford NC 27565

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ms. Lisa M. Harrison
Director - Health Department of
Granville County
P.O. Box 367
Oxford, NC 27565

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Connie Alston ☐ Agent ☐ Addressee

B. Received by (Printed Name): Connie Alston
C. Date of Delivery: 4/15/16

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7014 0340 0000 6351 0176

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

VEOLIA
ENVIRONMENTAL SERVICES

CONTINGENCY PLAN LOCAL AUTHORITY ARRANGEMENT

Submitted to: Mr. Harry Mills,
Executive Director
Granville Economic Development Commission
PO Box 26
Oxford, NC 27565

Submitted by: Veolia ES Technical Solutions, L.L.C.
2176 Will Suitt Road
Creedmoor, NC 27522

In accordance with federal regulations 40 CFR 264 Subpart D and North Carolina hazardous waste management regulations, 15A NCAC 13A.0109, Veolia has developed a Preparedness, Prevention, and Contingency Plan for the facility operations at 2176 Will Suitt Road, Creedmoor.

- In an emergency Veolia will dispatch the fire and police by dialing "911".
- Veolia will inform the Granville Economic Development Commission as necessary of any incidents involving the facility and Veolia understands that the Commission has no direct involvement in a response activity.

To acknowledge receipt and review of this facility contingency plan please sign and date this document in the space below and return to Veolia at the address shown above. In addition, as required by N.C.G.S. 130A-295, note below any special concerns or limitations regarding the adequacy of your resources and equipment to respond to an emergency at this facility. Attach additional pages as necessary.

Please contact me at 215-416-6527 with any questions or comments.

Thank You.

Veolia ES Technical Solutions
John Dyer
Environmental, Health, and Safety Manager
Date: 4/12/16

Granville Economic Development Com.
Harry Mills
Executive Director
Date: 6/16/16

7016 0340 0000 6351 0169

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Certified Mail Fee	$ 3.30
Extra Services & Fees (check box, add fee as appropriate)	
☑ Return Receipt (hardcopy)	$ 2.70
☑ Return Receipt (electronic)	$ 1.35
☐ Certified Mail Restricted Delivery	$
☐ Adult Signature Required	$
☐ Adult Signature Restricted Delivery	$
Postage	$ 1.36
Total Postage and Fees	$ 8.71

Postmark Here

(mr. HARRY mills)

Sent To: GRANVille ECONomic Development
Street and Apt. No., or PO Box No.: PO BOX 26
City, State, ZIP+4®: OXFORD, NC 27565

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Harry Mills, Executive Director
Granville Economic Development Commission
P.O. Box 26
Oxford, NC 27565

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name): HARRY Mills
C. Date of Delivery: 4-20-16

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Transfer from service label)* 7016 0340 0000 6351 0169

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

VEOLIA
ENVIRONMENTAL SERVICES

CONTINGENCY PLAN LOCAL AUTHORITY ARRANGEMENT

Submitted to: Mr. LT McPhail
North Carolina Highway Patrol
101 S. Miami Blvd
Durham, NC 27703-4328

Submitted by: Veolia ES Technical Solutions, L.L.C.
2176 Will Suitt Road
Creedmoor, NC 27522

In accordance with federal regulations 40 CFR 264 Subpart D and North Carolina hazardous waste management regulations, 15A NCAC 13A.0109, Veolia has developed a Preparedness, Prevention, and Contingency Plan for the facility operations at 2176 Will Suitt Road, Creedmoor.

- In an emergency Veolia will dispatch the police by dialing "911".

To acknowledge receipt and review of this facility contingency plan please sign and date this document in the space below and return to Veolia at the address shown above. In addition, as required by N.C.G.S. 130A-295, note below any special concerns or limitations regarding the adequacy of your resources and equipment to respond to an emergency at this facility. Attach additional pages as necessary.

Please contact me at 215-416-6527 with any questions or comments.

Thank You.

Veolia ES Technical Solutions

John Dyer
Environmental, Health, and Safety Manager
Date: 4/12/2016

North Carolina Highway Patrol

LT McPhail
NC Highway Patrol First Sergeant
Date: 6/16/16

Delivered

Tracking No.or Nickname	Shipper city, state	Origin Terminal	Ship date	Status	Recipient city, state	Delivery date
776110237880	CREEDMOOR, NC	RALEIGH, NC	4/14/2016		ABBOTT PARK, IL	4/18/2016 8:33 am
776081506230	CREEDMOOR, NC	RALEIGH, NC	4/12/2016		BUTNER, NC	4/15/2016 12:16 pm
776081506032	CREEDMOOR, NC	RALEIGH, NC	4/12/2016		BUTNER, NC	4/15/2016 12:23 pm
776081549399	CREEDMOOR, NC	RALEIGH, NC	4/12/2016		DURHAM, NC	4/15/2016 10:39 am
776081616687	CREEDMOOR, NC	RALEIGH, NC	4/12/2016		OXFORD, NC	4/15/2016 3:11 pm

Delivered

Browning 4 of 5

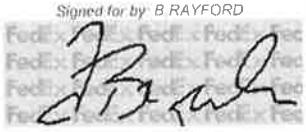
776081549399

Ship date:
Tue 4/12/2016

Actual delivery:
Fri 4/15/2016 10:39 am

VEOLIA ENVIRONMENTAL SERVICES
WENDY JONES
2176 WILL SUITT ROAD
CREEDMOOR, NC US 27522
919 582-3996

Delivered
Signed for by: B.RAYFORD



LT McPhail
101 S Miami Blvd
North Carolina Highway Patrol
DURHAM, NC US 27703
919 528-3996

Travel History

Date/Time	Activity	Location
4/15/2016 - Friday		
10:39 am	Delivered	DURHAM, NC
7:55 am	On FedEx vehicle for delivery	DURHAM, NC
7:19 am	At local FedEx facility	DURHAM, NC
4/14/2016 - Thursday		
9:39 am	At local FedEx facility	DURHAM, NC
9:34 am	At local FedEx facility	DURHAM, NC
	Package not due for delivery	
8:12 am	At local FedEx facility	DURHAM, NC
4/13/2016 - Wednesday		
9:29 am	At local FedEx facility	DURHAM, NC
9:28 am	At local FedEx facility	DURHAM, NC
	Package not due for delivery	
7:19 am	At local FedEx facility	DURHAM, NC
4/12/2016 - Tuesday		
10:01 pm	At destination sort facility	RALEIGH, NC
9:34 pm	Left FedEx origin facility	RALEIGH, NC
4:21 pm	Picked up	RALEIGH, NC
7:21 am	Shipment information sent to FedEx	

Shipment Facts

Tracking number	776081549399	**Service**	FedEx Express Saver
Weight	0.5 lbs / 0.23 kgs	**Delivery attempts**	1
Delivered To	Receptionist/Front Desk	**Total pieces**	1
Total shipment weight	0.5 lbs / 0.23 kgs	**Terms**	Not Available
Packaging	FedEx Envelope	**Special handling section**	Deliver Weekday

VEOLIA
ENVIRONMENTAL SERVICES

CONTINGENCY PLAN LOCAL AUTHORITY ARRANGEMENT

Submitted to:
Mr. Jason Zivica
Emergency Cooridinator
Duke University Medical Center
PO Box 100100
Durham, NC 27710

Submitted by:
Veolia ES Technical Solutions, L.L.C.
2176 Will Suitt Road
Creedmoor, NC 27522

In accordance with federal regulations 40 CFR 264 Subpart D and North Carolina hazardous waste management regulations, 15A NCAC 13A.0109, Veolia has developed a Preparedness, Prevention, and Contingency Plan for the facility operations at 2176 Will Suitt Road, Creedmoor.

- In an emergency Veolia will dispatch the fire, police, and medical assistance by dialing "911".
- Medical treatment for any injured parties may be required at Duke University Medical Center.

To acknowledge receipt and review of this facility contingency plan please sign and date this document in the space below and return to Veolia at the address shown above. In addition, as required by N.C.G.S. 130A-295, note below any special concerns or limitations regarding the adequacy of your resources and equipment to respond to an emergency at this facility. Attach additional pages as necessary.

Please contact me at 215-416-6527 with any questions or comments.

Thank You.

Veolia ES Technical Solutions

John Dyer
Environmental, Health, and Safety Manager
Date: 4/12/16

Duke University Medical Center

Jason Zivica
Emergency Coordinator
Date: 6/15/16

My Profile Support Locations English Search or tracking number Subi

FedEx Shipping Tracking Manage Learn FedEx Office ® WENDY JONES

Delivered

Tracking No.or Nickname	Shipper city, state	Origin Terminal	Ship date	Status	Recipient city, state	Delivery date
776081484560	CREEDMOOR, NC	RALEIGH, NC	4/12/2016		OXFORD, NC	4/15/2016 1:49 pm
776081536561	CREEDMOOR, NC	RALEIGH, NC	4/12/2016		DURHAM, NC	4/15/2016 1:42 pm

Delivered Showing 2 of 2

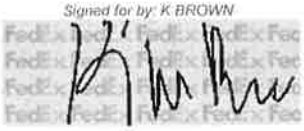
776081536561

Ship date
Tue 4/12/2016

Actual delivery
Fri 4/15/2016 1:42 pm

VEOLIA ENVIRONMENTAL SERVICES
WENDY JONES
2176 WILL SUITT ROAD
CREEDMOOR, NC US 27522
919 582-3996

Delivered
Signed for by: K BROWN



Jason Zivica/Emergency Coordinator
DUMC 3521
Duke University Medical Center
DURHAM, NC US 27710
919 528-3996

Travel History

Date/Time	Activity	Location
- 4/15/2016 - Friday		
1:42 pm	Delivered	DURHAM, NC
8:06 am	On FedEx vehicle for delivery	DURHAM, NC
7:51 am	At local FedEx facility	DURHAM, NC
- 4/14/2016 - Thursday		
9:39 am	At local FedEx facility	DURHAM, NC
9:34 am	At local FedEx facility	DURHAM, NC
	Package not due for delivery	
7:23 am	At local FedEx facility	DURHAM, NC
- 4/13/2016 - Wednesday		
9:29 am	At local FedEx facility	DURHAM, NC
9:28 am	At local FedEx facility	DURHAM, NC
	Package not due for delivery	
7:19 am	At local FedEx facility	DURHAM, NC
- 4/12/2016 - Tuesday		
10:01 pm	At destination sort facility	RALEIGH, NC
9:34 pm	Left FedEx origin facility	RALEIGH, NC
4:21 pm	Picked up	RALEIGH, NC
7:20 am	Shipment information sent to FedEx	

Shipment Facts

Tracking number	776081536561	Service	FedEx Express Saver
Weight	0.5 lbs / 0.23 kgs	Delivery attempts	1
Delivered To	Receptionist/Front Desk	Total pieces	1
Total shipment weight	0.5 lbs / 0.23 kgs	Terms	Not Available
Packaging	FedEx Envelope	Special handling section	Deliver Weekday

VEOLIA
ENVIRONMENTAL SERVICES

CONTINGENCY PLAN LOCAL AUTHORITY ARRANGEMENT

Submitted to: MR. DANNY ROBERTS, DIRECTOR
BUTNER PUBLIC SAFETY DIVISION
611 CENTRAL AVENUE
BUTNER, NC 27509

Submitted by: Veolia ES Technical Solutions, L.L.C.
2176 Will Suitt Road
Creedmoor, NC 27522

In accordance with federal regulations 40 CFR 264 Subpart D and North Carolina hazardous waste management regulations, 15A NCAC 13A.0109, Veolia has developed a Preparedness, Prevention, and Contingency Plan for the facility operations at 2176 Will Suitt Road, Creedmoor.

- In an emergency Veolia will dispatch the Butner Public Safety Division by dialing "911".
- Under the direction of the responding fire department Chief or designee, the Veolia staff will assist in the response activities whenever possible.

To acknowledge receipt and review of this facility contingency plan please sign and date this document in the space below and return to Veolia at the address shown above. In addition, as required by N.C.G.S. 130A-295, note below any special concerns or limitations regarding the adequacy of your resources and equipment to respond to an emergency at this facility. Attach additional pages as necessary.

Please contact me at 215-416-6527 with any questions or comments.

Thank You.

Veolia ES Technical Solutions

John Dyer
Environmental, Health, and Safety Manager

Date: 4/12/16

Butner Public Safety Division

Danny Roberts
Director

Date: 4/27/16

My Profile | Support | Locations | English | Search or tracking number | Subr

FedEx Shipping | Tracking | Manage | Learn | FedEx Office ® | WENDY JONES

Delivered

Tracking No.or Nickname	Shipper city, state	Origin Terminal	Ship date	Status	Recipient city, state	Delivery date
776110237880	CREEDMOOR, NC	RALEIGH, NC	4/14/2016		ABBOTT PARK, IL	4/18/2016 8:33 am
776081506230	CREEDMOOR, NC	RALEIGH, NC	4/12/2016		BUTNER, NC	4/15/2016 12:16 pm
776081506032	CREEDMOOR, NC	RALEIGH, NC	4/12/2016		BUTNER, NC	4/15/2016 12:23 pm
776081549399	CREEDMOOR, NC	RALEIGH, NC	4/12/2016		BURNHAM, NC	4/15/2016 10:39 am
776081616687	CREEDMOOR, NC	RALEIGH, NC	4/12/2016		OXFORD, NC	4/15/2016 3:11 pm

Delivered

Showing 3 of 5

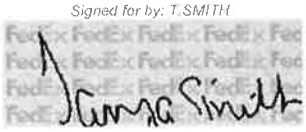
776081506032

Ship date:
Tue 4/12/2016

Actual delivery:
Fri 4/15/2016 12:23 pm

VEOLIA ENVIRONMENTAL SERVICES
WENDY JONES
2176 WILL SUITT ROAD
CREEDMOOR, NC US 27522
919 582-3996

Delivered
Signed for by: T.SMITH



DANNY ROBERTS
BUTNER PUBLIC SAFETY DIVISION
611 CENTRAL AVE
BUTNER, NC US 27509
919 575-6561

Travel History

Date/Time	Activity	Location
- 4/15/2016 - Friday		
12:23 pm	Delivered	BUTNER, NC
8:25 am	On FedEx vehicle for delivery	RALEIGH, NC
7:08 am	At local FedEx facility	RALEIGH, NC
- 4/14/2016 - Thursday		
8:21 am	At local FedEx facility	RALEIGH, NC
8:20 am	At local FedEx facility Package not due for delivery	RALEIGH, NC
7:09 am	At local FedEx facility	RALEIGH, NC
- 4/13/2016 - Wednesday		
8:30 am	At local FedEx facility	RALEIGH, NC
8:18 am	At local FedEx facility Package not due for delivery	RALEIGH, NC
8:17 am	At local FedEx facility Package not due for delivery	RALEIGH, NC
7:14 am	At local FedEx facility	RALEIGH, NC
- 4/12/2016 - Tuesday		
10:01 pm	At destination sort facility	RALEIGH, NC
9:34 pm	Left FedEx origin facility	RALEIGH, NC
4:21 pm	Picked up	RALEIGH, NC
7:10 am	Shipment information sent to FedEx	

Shipment Facts

Tracking number	776081506032	Service	FedEx Express Saver
Weight	0.5 lbs / 0.23 kgs	Delivery attempts	1
Delivered To	Receptionist/Front Desk	Total pieces	1
Total shipment weight	0.5 lbs / 0.23 kgs	Terms	Not Available
Packaging	FedEx Envelope	Special handling section	Deliver Weekday

VEOLIA
ENVIRONMENTAL SERVICES

CONTINGENCY PLAN LOCAL AUTHORITY ARRANGEMENT

Submitted to: Mr. Michael S. Felts
Granville County Manager
PO Box 906
Oxford, NC 27565

Submitted by: Veolia ES Technical Solutions, L.L.C.
2176 Will Suitt Road
Creedmoor, NC 27522

In accordance with federal regulations 40 CFR 264 Subpart D and North Carolina hazardous waste management regulations, 15A NCAC 13A.0109, Veolia has developed a Preparedness, Prevention, and Contingency Plan for the facility operations at 2176 Will Suitt Road, Creedmoor.

- In an emergency Veolia will dispatch the fire, police, and medical assistance by dialing "911".
- Veolia will inform the Health Department of Granville County as necessary of any incidents involving the facility.

To acknowledge receipt and review of this facility contingency plan please sign and date this document in the space below and return to Veolia at the address shown above. In addition, as required by N.C.G.S. 130A-295, note below any special concerns or limitations regarding the adequacy of your resources and equipment to respond to an emergency at this facility. Attach additional pages as necessary.

Please contact me at 215-416-6527 with any questions or comments.

Thank You.

Veolia ES Technical Solutions

John Dyer
Environmental, Health, and Safety Manager

Date: 4/12/16

Granville County

Michael S. Felts
Granville County Manager

Date: 4/26/2016

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OXFORD, NC 27565

OFFICIAL USE

Certified Mail Fee	$3.30	3.30
Extra Services & Fees (check box, add fee as appropriate)		
☑ Return Receipt (hardcopy)	$0.00	$0.00
☑ Return Receipt (electronic)	$0.00	$0.00
☐ Certified Mail Restricted Delivery	$0.00	$0.00
☐ Adult Signature Required	$0.00	$0.00
☐ Adult Signature Restricted Delivery	$	
Postage	$1.36	1.36
Total Postage and Fees	$7.36	8.71

0518
02

Postmark Here

04/12/2016

Sent To: MR Michael Felts/Granville County MGR
Street and Apt. No., or PO Box No.: PO BOX 906
City, State, ZIP+4®: OXFORD NC 27565

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7016 0340 0000 6351 0183

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Michael S.Felts
Granville County Manager
P.O. Box 906
Oxford, NC 27565

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Patricia D. Wilkerson ☐ Agent ☐ Addressee

B. Received by (Printed Name) Patricia D. Wilkerson C. Date of Delivery 4-19-16

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7016 0340 0000 6351 0183

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-15

Section H
Contingency Plan

(§264.50 - §264.56 and §270.14 b(7))

The following Contingency Plan has been prepared for the Veolia ES Technical Solutions, L.L.C. facility and is designed to minimize hazards to human health and the environment from fire, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water. A copy of the Contingency Plan and all revisions will be maintained at the facility and will be submitted to all local police departments, fire departments and state and local emergency response teams that may be called upon to provide emergency service. The provisions of the plan will be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

I. General Information

Facility Name: Veolia ES Technical Solutions, L.L.C.

Location: 2176 Will Suitt Road
Creedmoor, NC 27522

Owner: Veolia ES Technical Solutions, L L.C.
4760 World Houston Parkway
Houston TX 77032

Description of Facility Operation:

Veolia ES Technical Solutions, L.L.C. (Veolia) is an environmental service firm specializing in the packaging, handling and transportation of hazardous wastes. Veolia operates a hazardous waste storage facility at the corner location of State Routes 1104 and 1106 near Butner, North Carolina. Storage operations consist of the receipt and storage of containerized hazardous wastes

until such time that the wastes are shipped off-site for ultimate treatment and disposal. Further, Veolia proposes to conduct limited consolidation operations at the facility beginning with the permit renewal. Veolia may manage all RCRA and NC state hazardous wastes that are listed in the facility's Part A application. There are no tank storage or disposal activities conducted at the facility. All wastes are packaged in DOT acceptable containers while in storage. The maximum storage capacity of the facility is 1,600 55-gallon drums or the volumetric equivalent in other DOT acceptable containers. Wastes are stored in trailers parked at the loading dock or staged on a NCDEQ state approved, contained and secure outbound shipment area not to exceed the 10 day time frame once the aisle space has been broken. There are no wastes stored in the warehouse.

Attached to this plan are three site drawings, a site location map, building layout map with evacuation routes, and loading dock layout map. The hazardous/non-hazardous wastes are stored on trailers, which are located at the loading dock in the rear of the facility. The loading dock is broken into 4 distinct quadrants, which allow for the proper storage and segregation for the hazard classes.

Institutions of Concern:

There is a private daycare center located north of the facility within ¼ mile that has been identified as an "Institution of Concern." This business has been notified of the activities conducted at the facility and will be notified of any substantial change in activities. In addition, the Day Care would be notified in person of any emergency event that could not be contained within the Veolia facility.

II. Emergency Coordinators

At all times, there will be at least one employee either on the facility premises or on call and available to respond to an emergency at the facility within a short period of time. The Emergency Coordinator will have the responsibility for coordinating all emergency measures. The Emergency Coordinator has the authority to commit the resources needed to carry out the Contingency Plan.

The following is a list of Emergency Coordinators who will be given the responsibility for coordinating all emergency response measures and who will have the authority to commit the resources needed to carry out the Contingency Plan. Each Coordinator will be thoroughly familiar with all aspects of the Contingency Plan, all operations and activities at the facility, the location of all records within the facility, and the facility layout. At all times, there will be at least one emergency coordinator on the facility premises or on call. This list will be maintained and amended as necessary.

Emergency Coordinators

Primary:	J. Leonard Beck 4043 Our Road Oxford, NC 27565	Home: (919) 603-5610 Work: (919) 529-3223 Cellular: (919) 604-3306
Alternates:	John Dyer 2425 Lobach Drive Mechanicsburg, PA 17055	Home: (717) 796 1411 Work: (717) 764 8677 ext 12 Cellular: (215) 416-6527
	Ray Fletcher 4505 Fowlers Creek Drive Zebulon, NC 27597	Home: (919) 556-8080 Work: (919) 529-3226 Cellular: (919) 946-0562
	Alan Jenkins 1014 Windmere Lane Wake Forest, NC 27587	Home: (919) 554-0031 Work: (919) 529-3228 Cellular: (919) 210-2868
	Doug Ross 1516-C Pope Rd.	Home: (919) 528-2011 Work: (919) 529-3231

Creedmoor, NC 27522 Cellular: (919) 812-8038

III. Duties and Responsibilities of the Veolia Emergency Coordinator

Whenever there is an imminent or actual emergency situation, the Emergency Coordinator (or his designee when the Emergency Coordinator is on call) will immediately:

(a) Activate internal facility alarms or communication systems, where applicable, to notify facility personnel and,
(b) Notify appropriate state or local agencies with designated response roles if their help is needed. The following agencies and emergency response providers may be contacted:

POLICE DEPARTMENTS
Butner Public Safety Division
Emergency 911
Other: (919) 575-6561

FIRE DEPARTMENTS
Butner Public Safety Division
Emergency 911
Other: (919) 575-6561

HOSPITAL
Duke University Medical Center
1306 Hospital North
P.O. BOX 3869
Durham, NC 27710
(919) 684-2413

ENVIRONMENTAL PROTECTION AGENCY

Regional Administrator

Federal EPA Region IV

Sam Nunn Atlanta Federal Center

61 Forsyth Street; SW

Atlanta, GA 30303

(404) 562-9900

(800) 241-1754

North Carolina Department of Environmental Quality

Division of Waste Management

1646 Mail Service Center

2117 West Jones Street

Raleigh, NC 27699-1646

Phone: (919) 707-8200

NORTH CAROLINA HIGHWAY PATROL CENTER

(800) 662-7956

USEPA NATIONAL RESPONSE CENTER

(800) 424-8802

Emergency Response Contractor

Veolia ES Special Services

N. 104 W. 13275 Donges Bay Road

Germantown, WI 53022

(800) 688-4005

Whenever there is a release, fire or explosion, the Emergency Coordinator will immediately identify the character, exact source, amount and aerial extent of any released materials. He may do this by observation or review of facility records or manifests and, if necessary, by chemical analysis.

Concurrently, the Emergency Coordinator will assess possible hazards to human health or the environment that may result from the release, fire or explosion. This assessment will consider both direct and indirect effects of the release, fire, or explosion; (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water, run-off from water or chemical agents used to control fire and heat-induced explosions).

IV. Roles of Emergency Response Agencies and Responders

The general role of the local emergency responders is listed below:

(a) Police Departments

The Police Department is responsible for public safety during an emergency. This includes, traffic control, crowd control, and assisting in the event of an evacuation of the public surrounding the facility.

(b) Fire Department

The Fire Department has primary responsibility for responding to fires and explosions at the facility. Once on the scene, Veolia will assist the Fire Department in coordinating an appropriate response based on the nature of the incident at the facility.

(c) Hospital

The hospital will provide medical attention to any employees, emergency responders, or the public injured as a result of an incident.

(d) Emergency Response Contractors

Emergency response contractors will provide support to Veolia in clean-up and remediation activities following an incident.

(e) Access to Facility Inventory of Wastes

Veolia has provided an electronic inventory of the wastes stored on-site to the UT Dallas ER Plan. This information is updated daily and is accessible to emergency responders. In addition, Veolia places a paper copy of this same inventory information in a locked mailbox located just outside of the metal building at the right of the entrance to the parking lot.

V. Reporting Requirements

If the Emergency Coordinator determines that the facility has had a release, fire, or explosion that could threaten human health or the environment, outside the facility, he will report his findings as follows:

(a) If his assessment indicates that evacuation of local areas may be advisable, he will immediately notify appropriate local authorities. He will be available to help appropriate officials decide whether local areas should be evacuated; and

(b) He will immediately notify either the government official designated as on-scene coordinator for that geographical area, or the National Response Center (using their 24 - hour toll free number (800) 424-8802). This report will include:

- Name and telephone number of reporter;

- Name and address of facility;
- Time and type of incident (e.g., release, fire);
- Name and quantity of material(s) involved, to the extent known;
- The extent of injuries, if any; and
- The possible hazards to human health, or the environment, outside the facility.

VI. Emergency Actions

During an emergency, the Emergency Coordinator will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures will include, where applicable, stopping operations, collecting and containing released waste and removing or isolating containers.

If the facility ceases operations in response to a fire, explosion, or release, the emergency coordinator will monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes or other equipment, wherever this is appropriate.

VII. Emergency Response Procedures

Incidents fall under two general classifications:

(1) Fire and/or explosions or
(2) Spills or material release.

A. Fire and/or Explosion

The following actions will be taken in the event of a fire or explosion:

- The Emergency Coordinator and all Veolia personnel will be alerted;

- All non-essential personnel, those not actively involved in fighting the fire or responding to the incident, will be evacuated immediately from the facility and affected area;
- Contract personnel and visitors will be cleared from the area and instructed to follow Veolia personnel to the designated assembly areas;
- Doors in the building will be closed;
- Facility operations will be shut down immediately;
- Efforts may be made, as determined by the Emergency Coordinator, to use portable fire extinguishers to fight the fire;
- If the incipient stage fire fighting efforts are unsuccessful or if the fire when first identified is determined to be beyond its incipient stage, the Emergency Coordinator will immediately notify the local fire department.
- All injured personnel will be removed and treated by qualified personnel.

All personnel will be trained in evacuation procedures and means of exit from their respective work areas. Until the need for an evacuation is signaled, personnel who are not in an affected area will stay in their respective work area.

Facility personnel receive training in incipient stage fire-fighting techniques as part of the overall personnel-training program. An "incipient stage fire" is defined by OSHA as "a fire which is in the initial or beginning stage and which can be controlled or extinguished by portable fire extinguishers, class II standpipe, or small hose systems without the need for protective clothing or breathing apparatus." All Veolia personnel have been trained in the use of hand-held fire extinguishers. If a fire is discovered in its incipient stage the Veolia employee will notify the Emergency Coordinator and if two employees are in attendance an employee may attempt to extinguish the fire using a portable fire extinguisher. Fire fighting by Veolia personnel will only be conducted on fires that are in an incipient or beginning stage. The early containment of fires can significantly decrease total damage, prevent the fire from spreading to additional wastes, reduce or eliminate toxic fumes, and reduce the quantity of waters used to extinguish the fire. However, fire fighting will not be done at the risk of injury to persons involved. In the event that

a fire is not discovered in its incipient stage, or it spreads beyond the incipient stage, the local fire department will be contacted.

In addition, reasonable efforts, without risking harm to the employees, will be made to prevent the fire from spreading to nearby areas and wastes. In areas where automatic fire suppression systems exist (storage trailers, warehouse, and office building), all doors and other openings will be closed. The doors and building openings will be closed to contain the fire and prevent it from spreading beyond the storage trailer, warehouse, or office building.

Upon arrival of the fire department at the facility, the fire department will assume primary responsibilities for fire fighting activities. Veolia will assist the fire department in coordination of a response by providing information concerning the waste materials, if any, involved in the fire. Fire-fighting and other emergency vehicles and equipment can easily access container storage areas. The loading dock and trailer parking areas will be kept as clear as possible at all times.

Area or facility evacuations may be necessary in case of major fire or explosion. Decisions to evacuate the nearly area will be the responsibility of the emergency coordinator.

When the fire has been extinguished and the safety of personnel is no longed endangered, an "all clear" signal will be given verbally by the Emergency Coordinator. All emergency equipment used in the emergency will be cleaned and fit for use prior to resumption of operations at the facility.

B. Spill or Material Release

Types of Potential Releases and Overview of Responses

The vast majority of wastes managed at this facility are wastes in 55-gallon containers or smaller. Therefore, the greatest likelihood for a release would be from a 55-gallon or smaller container during storage or container handling. The majority of the releases Veolia has

experienced are minor leaks caused by deteriorated or damaged containers. These releases can normally be remediated quickly by trained Veolia employees.

Other, less frequent releases, yet potentially more significant in nature could occur during the consolidation of materials or from a larger container, such as a cargo tank. During consolidation and transfer activities a material may be spilled due to a poor connection or fitting in a hose. These releases are also typically handled by Veolia personnel without need for additional support. A reaction occurring during consolidation activities also has the potential to occur. Veolia has compatibility testing procedures in place to greatly reduce the possibility of a reaction occurring during consolidation from incompatible wastes reacting. A reaction occurring during the consolidation of materials will be managed by Veolia employees by using a fire extinguisher if necessary to stop an uncontrolled reaction, or if a minor chemical compatibility reaction occurs, it will simply be closely monitored by Veolia personnel until the reaction subsides or is completed.

The potential for a release from a cargo tank used to store wastes is reduced by; ensuring that the waste is compatible with the tanker, adhering to DOT vehicle maintenance and inspection requirements for vehicles, and routinely inspecting all cargo tanks used on-site to ensure no leaks are occurring. A release from a tanker would be managed by capturing the released liquids in the secondary containment at the facility. Veolia personnel would use the pumps on-site to transfer the released material from the secondary containment into another cargo tank.

The general response to a spill or leak from a container is to identify, isolate, contain and remediate the leaking container and spilled material. If an employee discovers a chemical spill, he or she will immediately report it to the area supervisor. The area supervisor will immediately contact the Emergency Coordinator. When contacted, the Emergency Coordinator will ascertain the following information regarding the spill:

(a) The identity, quantity, and location of the material released. Several methods are used to determine the identity of a material that has spilled. The methods include, but are not limited to, the label attached to the container, the Waste Information

Profile (WIP), the hazardous waste manifest or bill of lading, information provided by the employee that has packaged or handled the material, the location of the container in storage, and the facility operating record.

(b) The direction in which the spill, vapor or smoke release is heading;

(c) Any injuries involved; and

(d) Possibility of fire and/or explosion

From this information the Emergency Coordinator will assess the magnitude and potential seriousness of the spill or release. If the incident is determined to be within Veolia's emergency response capabilities, the necessary facility personnel will be contacted and deployed. If the incident is beyond Veolia's capabilities, the Emergency Coordinator will contact the appropriate local authorities and, if necessary, the emergency response company listed in the plan with whom arrangements have been made.

In the event of a leak or a spill, released materials will generally flow towards the containment system that has a capacity to hold a minimum of 10% volume of the total storage capacity, or the capacity of the largest container, whichever is larger, due to the fact that the loading docks and the waste storage areas have been constructed with sloped surfaces. Container storage areas and the containment systems will be inspected daily for the signs of release.

Every release or spill of a hazardous waste is a unique event which therefore requires the response to those incidents must be specifically tailored based on the hazards and properties of the chemicals involved, the location of the release, the size or scope of the release, and the weather conditions. Although it is not possible, or practical to document in the contingency plan the specific responses required for all releases, there are some best practices procedures that are applied to most spill responses.

Most small spills and leaks will be easily contained within their immediate area. Upon direction of the Emergency Coordinator or designee, clean-up personnel will use absorbent pads, booms, or other inert materials to contain and clean up a small spill. All containment and clean up

materials will be placed into drums for proper disposal. The most common response scenario for a leaking container is as follows:

1. A determination is made by the Emergency Coordinator of the appropriate PPE to be worn by the emergency responders based on the knowledge of the chemicals involved. Once a determination has been made that the employees can safely respond to the release they will don the appropriate PPE.
2. Should the response require working in a confined space, the Veolia Confined Space Entry Procedures need to be implemented to respond to the release. A copy of the Confined Space Entry Procedure is included in the Veolia Corporate Health and Safety Plan.
3. Remove all ignition sources from the area surrounding a flammable material release;
4. The leaking container will be isolated from other containers by moving the container with a hand-held drum dolly or a lift truck. If it is not safe to move the leaking container, containers may be moved from around the leaking container. If the spill occurs on a trailer, the trailer will be emptied of all necessary containers to assist in the clean-up and decontamination process. Containers will be place on the loading dock or another storage trailer.
5. Contain a liquid spill using an absorbent material creating a dike system to capture the liquids released. Neutralize a release of an acid using a caustic material;
6. The container is placed in an overpack container or the contents of the container is transferred (i.e pumped) to a new container.
7. The absorbent and spilled material is collected and placed into the overpack container, or a separate container.
8. All areas that were contacted by the spilled material are decontaminated using a solution capable of removing contamination.
9. The de-contamination materials are placed into a container.
10. All containers are properly marked and labeled and placed into storage awaiting disposal.

Proper disposal is defined as follows: All spill materials will be identified from the paperwork that corresponds to the leaking container(s) (e.g., manifest, labels, packing summary, WIP,

container number). All spill clean-up materials will be containerized and the containers will be labeled and managed in accordance with the same standards applicable to the wastes that produced the spill.

If the spill results in the formation of toxic vapors, the facility will be evacuated, except for all emergency response personnel, until the spill has been contained and the facility is safe to reoccupy. Veolia will retain the responsibility for coordinating the emergency relief efforts in the event of a toxic vapor release, unless the toxic vapors are the result of a fire, where in that instance the Fire Department or Emergency Management Agency has the responsibility for incident command and directing the response. The magnitude and scope of the evacuation will be determined based on the toxicity of the chemicals involved in the incident, the amount of material released, and the weather conditions including wind speed and direction that would affect the transport of the vapor cloud off-site.

Veolia may use outside emergency response agencies to assist in the response to a spill or release, however, in all instances, Veolia will retain the responsibility for directing the response.

In case of a large spill reaching the concrete pad areas, the spill will be contained before reaching the trench, if possible, and cleaned up using the above methods. If it is not possible to contain the spill before it reaches the trench, the material will be removed from the trench and managed as described above. Spilled materials will be removed from the trench by pumping if the waste is a liquid or with a shovel if the waste is a solid. Next, containment trench and affected area will be decontaminated with plenty of water, or appropriate cleaner. The contaminated rinse water will be collected and pumped into 55-gallon drums or a cargo tank truck and disposed of in accordance with all EPA, NCDEQ and DOT regulations. The spilled materials will be identified as described above. Once properly identified the containers holding the spill clean-up materials will be properly labeled, stored, prior to transportation off-site for proper treatment and/or disposal.

In the event of a large release or a large amount of water used to extinguish a fire, Veolia may elect to use the services of third-party remediation contractors to manage the clean-up of

materials. In the event of a fire, a vacuum tank truck, or multiple trucks, will be utilized to collect any potentially contaminated waters. Contaminated soil and/or asphalt would be removed by a backhoe, or similar equipment, and placed into dump trailers or roll-offs. This equipment will be brought on-site to begin removing the water and/or soil as soon as possible, or in the event of a fire as soon as the Fire Department allows vehicles on-site.

VIII. Evacuation Procedures

The Emergency Coordinator or designee is responsible for determining which emergency situations require facility evacuation through coordination with the local response agencies. As previously described, the telephone system, a verbal call, or a manual pull-box could be activated to alert personnel of the emergency and cause the evacuation of all nonessential personnel from the facility. All facility operations personnel will be familiar with the alarm box locations and the methods for communicating the existence of emergency situations to fellow employees and outside authorities, if necessary.

Facility evacuation routes have been documented on site drawings and are posted throughout the facility. The evacuation routes will lead in the direction away from the loading dock, towards either of the two drives; the main drive onto SR1106 and the evacuation/emergency drive onto SR1104. An alternate evacuation route will exist from the loading dock through the office/warehouse building. Refer to attachment H3 for a evacuation plan diagram.

In the event facility evacuation is called for by the Emergency Coordinator, the following actions will be taken:

(a) The call for evacuation is given. This will be achieved with the use of the internal communications systems, by voice, or by manual pull box, whichever is most expedient.

(b) All nonessential personnel, visitors and contractors will immediately leave through the designated evacuation routes.

(c) No further entry of visitors, contractors or trucks will be permitted. All vehicle traffic within the facility will cease to allow safe evacuation.

(d) No persons shall be allowed to reenter the facility unless specifically authorized by the Emergency Coordinator. Those within the facility will normally include emergency teams and any other essential personnel as determined by the Emergency Coordinator.

(e) All persons will be accounted for by their immediate supervisors. No attempt to find persons not accounted for will involve endangering lives of others by reentry into emergency areas.

(f) Reentry in emergency areas will be made only after clearance is given by the Emergency Coordinator. At his or her direction, a notification will be given for reentry into the facility.

(g) Annual drills will be held to practice these procedures.

The Emergency Coordinator working with the Fire Department and Police Department will make the decision to evacuate the public. Any spills, releases, or fires resulting in the formation of toxic vapors that have the potential to migrate off-site will require the Emergency Coordinator to contact the emergency response agencies. An evacuation will occur when the potential exists, but prior to, the emergency event becoming a risk to human health to the surrounding community. The Emergency Coordinator will utilize all resources at his disposal to make the emergency evacuation decision including; information regarding the waste materials released or involved in the fire, information from Veolia operating record, air monitoring results, industrial hygiene resources, news reports, etc.

V. Disposal of Clean-up Materials

Immediately after an emergency, the Emergency Coordinator will provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water or any other material that results from a release, fire or explosion at the facility. The Emergency Coordinator will ensure

that, in the affected area (s) of the facility, no waste that may be incompatible with the release material is treated, stored or disposed of until cleanup procedures are completed. Veolia will isolate the release area and prevent all waste materials from being stored or managed in this area until all spilled materials have been collected, properly containerized, and the area decontaminated and all decontamination materials properly containerized and labeled.

Prior to restarting operations at the facility all emergency response equipment will be replaced or decontaminated and ready for re-use. The majority of the emergency response equipment used in a response will be replaced eliminating the need to decontaminate the materials. However, when equipment is decontaminated it will be cleaned utilizing an appropriate cleaning solution that will not harm the equipment. The cleaning solution will be collected, containerized, labeled, and properly disposed. The cleaned or new equipment will be placed into the appropriate emergency response equipment storage location. The Emergency Coordinator will ensure that all equipment has been replaced and/or decontaminated and is in storage prior to allowing operations to re-start.

VI. Written Follow -Up Report

Veolia will notify the Regional Administrator, NCDEQ and appropriate local authorities, that the facility is in compliance with the above requirements before operations are resumed in the affected areas of the facility.

Veolia will note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, Veolia will submit a written report on the incident to the Regional Administrator and NCDEQ. The report will include:

- Name, address and telephone number of the owner of operator;
- Name, address and telephone number of the facility;
- Date, time and type of incident (e.g., fire, explosion);
- Name and quantity of material(s) involved;
- The extent of injuries, if any;

- An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- Estimated quantity and disposition of recovered material that resulted from the incident

IX. Amendment of Contingency Plan

The contingency plan will be reviewed and immediately amended, if necessary, whenever:

- The facility permit is revised;
- The plan fails in an emergency;
- The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions or releases of hazardous wastes or hazardous waste constituents, or changes the response necessary in the emergency;
- The list of emergency coordinators changes; or
- The list of emergency equipment changes.

Emergency Equipment

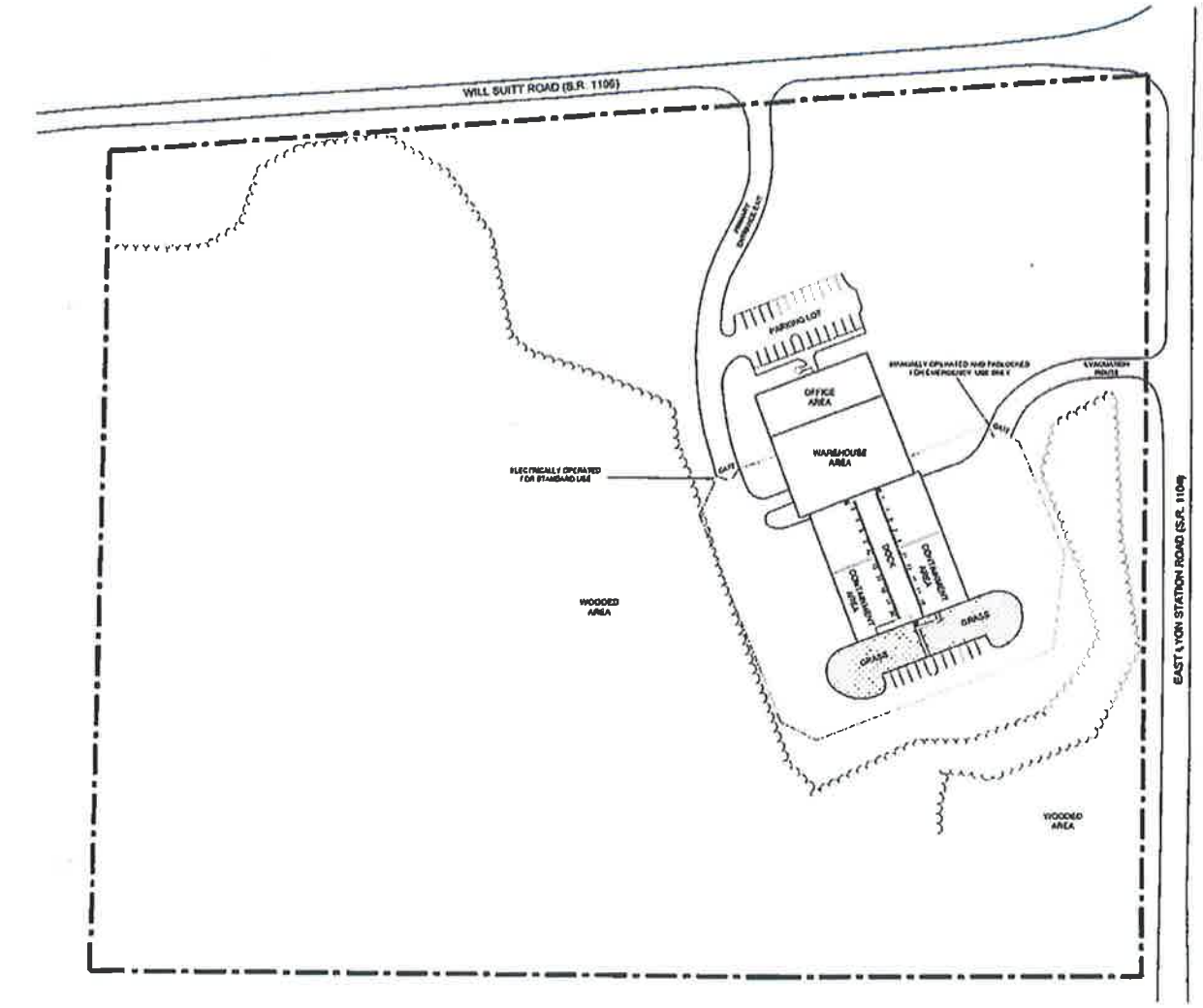
The following is a list of emergency equipment to be maintained at the facility, including the location, a physical description, and a brief outline of the capabilities of each item on the list. This list will be kept up to date.

Item	Description & Capabilities	Location
Absorbents	Non-combustible inert packaging and absorption material used to assist in spill containment and spill clean-up.	Warehouse
Absorbent pads, booms, and /or sweeps	Synthetic fiber material specifically designed to absorb oils and hydrocarbons. Used for spill containment and clean-up.	Warehouse
Various size DOT containers & recovery drums	DOT drums and recovery drums are used to over pack shipping containers or transfer contents in the event of an unexpected leak.	Warehouse
Personal Protective Equipment	Safety glasses are used to protect personnel from eye injuries. Disposable, chemical resistant suits, gloves and Self contained Breathing Apparatus (SCBAs), and air purifying full-face respirators and cartridges are used to protect personnel from hazardous material and provide for easy decontamination.	Warehouse
Shovels, brooms, & various other hand tools	Used for cleaning up spill clean-up materials or spilled solids.	Warehouse
Portable Pumps	Used for transferring liquids from containers or the spill trench.	Warehouse
Lime	Neutralization of corrosive, acidic, materials	Warehouse
Mercury Spill Kit	Used to remediate spills and leaks in the event of a mercury spill.	Warehouse

Stationary eye wash & safety shower	Safety shower and eye wash are used to rinse off the contaminated material in the event of an accident.	Loading Dock

Attachment H1

Veolia, Creedmoor, NC
Site Location Map



REFERENCE: MACTEC FIELD NOTES.

MACTEC

MACTEC ENGINEERING AND CONSULTING, INC.
3301 ATLANTIC AVENUE
RALEIGH, NORTH CAROLINA

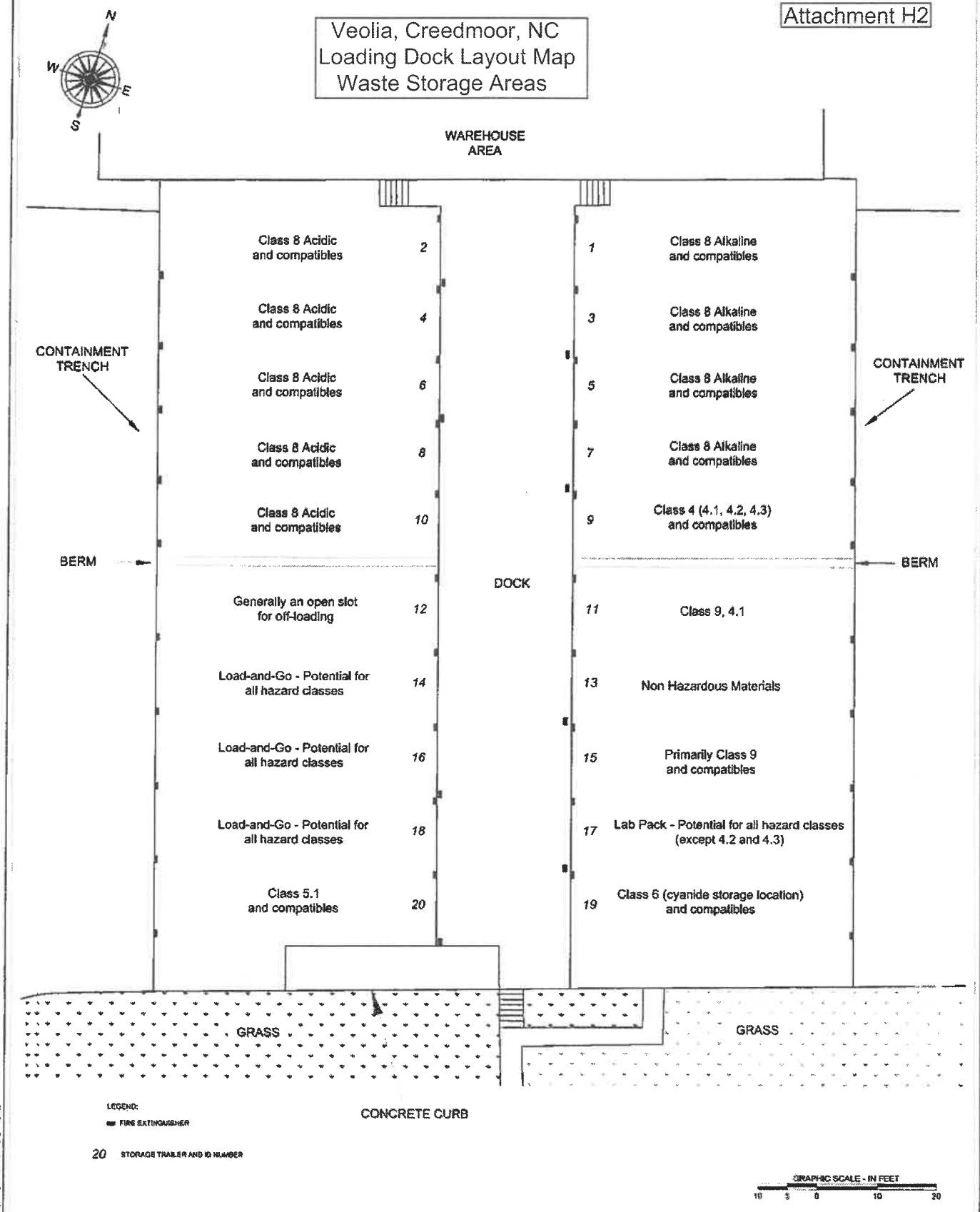
DRAWN:	R.R.
ENG CHECK:	
APPROVAL:	
DATE:	SEPTEMBER 2007
SCALE:	1" = 80'

SITE LOCATION MAP
VEOLIA ES
CREEDMOOR, NORTH CAROLINA

JOB NO.	DWG NO.
6470-07-1894.01	2

Attachment H2

Veolia, Creedmoor, NC
Loading Dock Layout Map
Waste Storage Areas



REFERENCE: MACTEC FIELD NOTES.

MACTEC
MACTEC ENGINEERING AND CONSULTING, INC.
3301 ATLANTIC AVENUE
RALEIGH, NORTH CAROLINA

DRAWN:	R.R.
ENG CHECK:	
APPROVAL:	
DATE:	SEPTEMBER 2007
SCALE:	1" = 10'

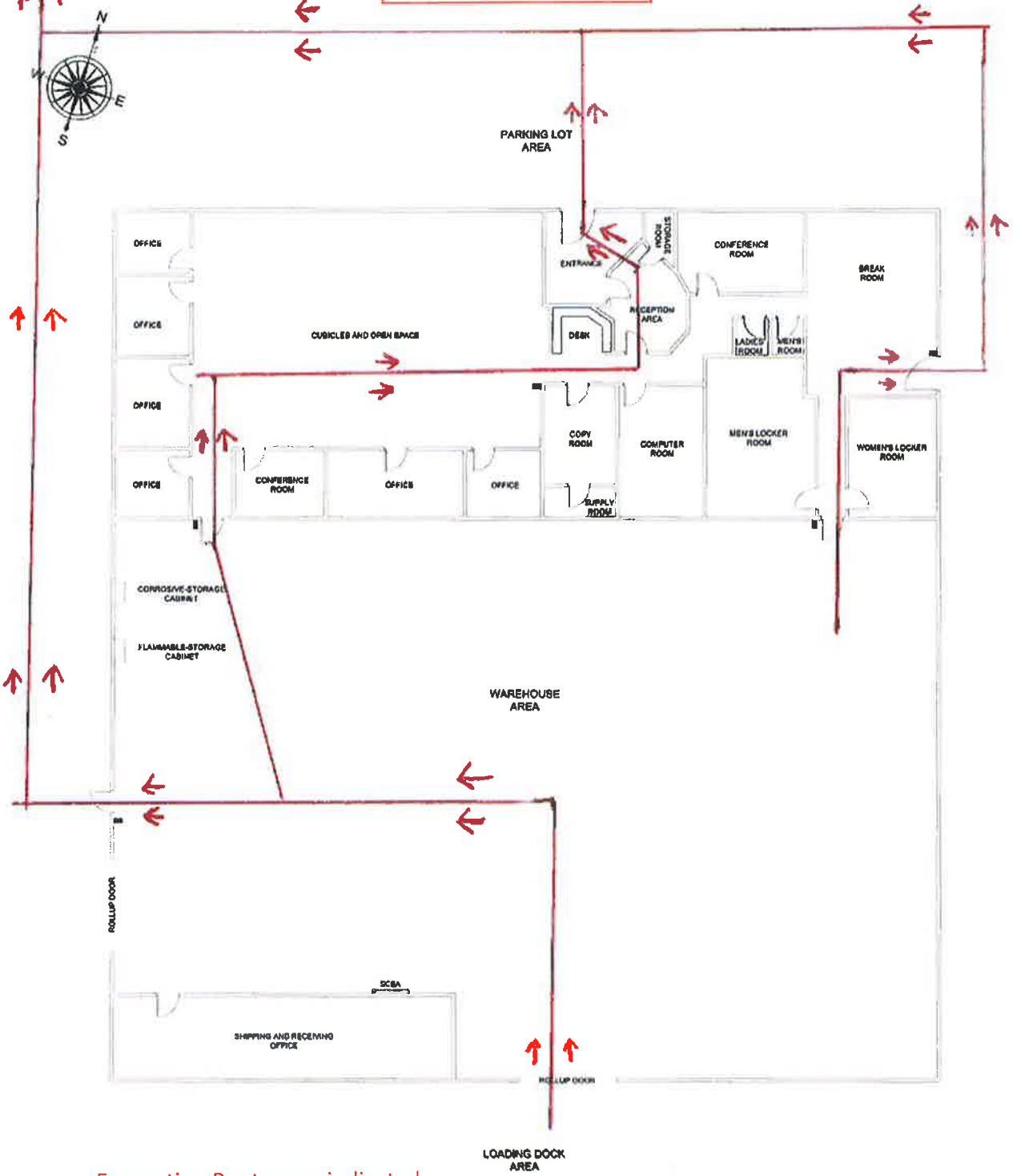
LOADING DOCK LAYOUT MAP
VEOLIA ES
CREEDMOOR, NORTH CAROLINA

JOB NO.	DWG NO.
6470-07-1494.01	4

Rally Point

Veolia, Creedmoor, NC Building Layout Map

Attachment H3



Evacuation Routes are indicated with red arrows.

LEGEND:
FIRE EXTINGUISHER

GRAPHIC SCALE - IN FEET
10 5 0 10 20

MACTEC
MACTEC ENGINEERING AND CONSULTING, INC.
DRAWN: H.R.
CHECKED:
APPROVED:
DATE: SEPTEMBER 2007
SCALE: 1" = 10'
BUILDING LAYOUT MAP
VEOLIA ES
CREEDMOOR, NORTH CAROLINA
JOB NO. 6478-07-1894.01
DWG NO. 3

REFERENCE: MACTEC FIELD NOTES.

Section I

Preventive Procedures, Structures and Equipment

(§270.14 (b)(8))

The Veolia facility is designed and operated in a manner to prevent hazards to human health and the environment.

I. Unloading Operations

Veolia field crews transport materials from the generator's site back to the Veolia facility in vehicles authorized to transport wastes by DOT. Alternatively, waste materials are delivered to the facility directly from the generator or from pre-approved third party companies that conduct similar operations to Veolia. Vehicles back-up to the loading dock into an unloading spot where all containers are inspected and the paperwork reviewed by designated personnel. Containers are inspected to ensure that they are in good condition, free from leaks, dents, rust and corrosion. All incoming paperwork is reviewed for discrepancies and verification of the container piece count.

Materials are unloaded with the use of a drum dolly, pallet jack, forklift, or manually. Materials are placed into a trailer destined for an ultimate disposal facility or into a trailer used for storage only. Alternatively, the wastes may be consolidated and transferred to another container, such as a roll-off or cargo tank, as described in Section P.

II. Run-Off

There is no run-off from the hazardous waste handling areas to other areas of the facility or environment. The facility and secondary containment system is completely under roof preventing rainwater from coming into contact with the waste materials. The facility's secondary containment system is designed to prevent the runoff of hazardous wastes in the event of a release. Furthermore, there are no waste handling operations that occur outside of a containment area. The secondary containment includes an impervious reinforced concrete base

(pad) surrounding the loading dock to the east and west. The concrete pad is further divided into four separate quadrants by a separation curb to prevent commingling of incompatible wastes. Both the east and west concrete pads are intersected by a trench drain running the full length of the concrete pad and approximately 6 feet from its outermost edge. The concrete pad on both sides of the trench drain is sloped towards the trench drain so that any liquids on the surface will drain into the containment trench.

The trenches are similar on both sides of the dock. The trenches are divided into two sections by a 6" valve. These valves normally remain in the closed position. The valves are only opened when necessary to clean the trench following a spill or collect rainwater that may accumulate following a storm. Any liquids in the trench flow from one end of the trench to the other where they can be collected and properly managed either for disposal, in the case of a cleaning rinseate, or potentially discharged, in the case of clean, uncontaminated stormwater. Refer to Attachment A6 for design drawings of the expanded secondary containment system as well as Section P, Subsection IIIA, for a detailed description of the secondary containment system.

The concrete base and trenches are maintained free of cracks or gaps and are sufficiently impervious to contain leaks and spills until such time as the material is detected and remediated. The trenches are covered with a heavy duty grate allowing for visual inspection of the containment trench by Veolia personnel as outlined in Section F.

The loading docks and storage trailers are covered by a 130' by a 140' foot roof. The roof covers the dock, containment pad and trench areas and extends approximately 1 foot beyond the outermost edge of the containment pad on either side of the dock. The roof and the sloped containment pad limits the accumulation of rainwater within the active portion of the facility, except for incidental rainwater in the trenches which occurs occasionally as the result of a windblown rainfall. In addition, the pavement adjacent to the containment system on either side is graded away from the trenches as indicated on Attachment A6-4 to further prevent run-on to the containment area.

In the event that rainwater accumulates in the trenches, designated Veolia personnel visually inspect the water for signs of contamination (i.e., color, presence of foam or sheen) and measure the pH. Veolia maintains these inspection records on file at the facility. In addition, it is verified that no spills or releases of waste materials have occurred and reached the trenches which could contaminate the rainwater. If the trenches and the accumulated water are deemed to be free of contamination, it is removed from the trench with pumps and discharged onto the adjacent asphalt surface. If the quantity is sufficient, the stormwater exits the facility through the curb cuts at the south end of the site in accordance with the facility's stormwater permit. In the event that the rainwater in the trenches is known or suspected to have been contaminated due to contact with waste materials, Veolia will collect and dispose of the contaminated water in accordance with all applicable regulations.

The facility's secondary containment system is designed to prevent the contamination of the surrounding area. The trailers and other units (e.g., roll-off boxes, cargo tanks, IBCs, etc.,), containers and containment system are inspected on a daily basis to identify potential spills and leaks.

III. Water Suppliers

There is no water used in the daily facility operations. The facility operations involve containerized storage and limited treatment operations. No wastes are disposed at the facility. The water supplied to the office for domestic purposes is supplied by the City of Butner.

IV. Equipment and Power Failure

External factors such as power outages, floods, snowstorms, etc., would have a minimal impact upon facility storage and treatment operations as these operations are not wholly dependent on the availability of electricity. In the event of a power outage, sufficient sunlight should be available during most normal working hours for operations to continue uninterrupted. Portable lighting is available to the loading dock and the fire extinguishers will remain operable. Power failures may however restrict container receipt and transfer operations conducted at the facility,

since the information necessary to track container movements is stored and transferred electronically. In the event of a power failure the necessary tracking and other information will be maintained on paper until power is restored.

Emergency equipment is inspected on a monthly or "as used" basis and will be immediately repaired or replaced as needed.

If the Facility Management (e.g., Branch, Operations, or Environmental, Health and Safety Manager) determines that operations need to be discontinued due to unsafe weather conditions, power outages or equipment failure, all facility activities will be temporarily halted. Transportation of waste materials to and from the facility will be ceased, as Veolia has complete control over the scheduling of incoming and outgoing shipments. Resumption of operations at the facility will not occur until which time it is safe to do so.

V. Personal Protective Equipment

All Veolia facility operations personnel are trained in the proper selection and use of personal protective equipment (PPE). Veolia requires the use of PPE, as outlined below, to prevent undue exposure of personnel to hazardous wastes.

A. Basic Work Uniform

Basic work uniform consists of work shirts, work pants, steel toed shoes or boots, safety goggles or glasses and work gloves. These standard work clothes have been approved by the Veolia Health and Safety Department for the safe handling of wastes in closed containers.

B. PPE

All employees are assigned personal protective equipment and instructed on its proper use and maintenance. The basic package of personal protective equipment consists of full-face respirators and cartridges, boots, gloves and chemical resistant clothing.

In the event of a spill or release, or if containers are opened to sample or transfer the wastes into larger containers, personnel managing materials known to be hazardous or of unknown toxicity are required to take sufficient precautions. It is the responsibility of the Facility Manager, Emergency Coordinator, or Environmental, Health and Safety Manager to specify the correct level of protective equipment. All operations personnel that are required to don PPE receive training in the proper use and methods of wearing protective equipment. The level of protective equipment is determined by the type of material involved in the operation to which the employee may be exposed.

The majority of the PPE utilized by the Creedmoor facility is disposable. All used disposable PPE is containerized and shipped off-site for disposal in accordance with all EPA, NCDEQ and DOT Regulations. Non-disposable items are decontaminated using a detergent wash or other appropriate cleaning agent based on the nature of the contaminants and then rinsed with clean water. All wash waters are containerized for disposal.

Section J

Ignitable, Reactive, or Incompatible Wastes

(§264.17 and §270.14(b)(9))

All ignitable, reactive or incompatible wastes are separated and protected from external sources of ignition or reaction including, but not limited to: open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electric, or mechanical), spontaneous ignition (i.e., from heat-producing chemical reactions), and radiant heat as required by 40 CFR §264.17.

Smoking is prohibited in all active areas of the facility. "NO SMOKING" signs are conspicuously posted at all entrances to the active areas of the facility. Smoking is also prohibited within the office building and warehouse. Smoking is permitted outside the break room and front office door. There are no open flames, cutting, welding, hot surfaces or any equipment which may cause sparks allowed within the active portion of the facility, unless a remedial activity requires it and a hot-work permit has been completed. In these instances, all precautions are taken so that the operation does not result in the ignition of any waste materials

I. Special Handling Procedures for Containers

All containers arrive at the facility tightly and securely closed in order to minimize the potential for generation of uncontrolled toxic mists, fumes, gases, dusts, or leaks. Containers will remain closed except when it is necessary to sample or visually inspect the container contents, and when wastes are transferred from one container to another.

The major precautions taken to prevent an accidental ignition or reaction lie in Veolia's system of packaging and segregation of waste materials on the basis of chemical compatibility. The containerized waste accepted at the facility are of two general types: (1) packaged laboratory chemicals (labpacks) and (2) single packagings ranging from 5 gallon pails to 30 yard roll-off units and 7,000 gallon cargo tanks.

Labpacks consist of several small individual waste containers, cushioned with non-combustible absorbent material and placed within a larger outside container. Labpacks are packaged in accordance with DOT requirements in 49 CFR §173.12(b), and EPA's requirements in 40 CFR §264.316. Only one hazard class of waste materials may be placed into a container. Incompatible wastes cannot be placed into the same outside container.

All non-labpack containers are visually inspected at the generator's site to ensure that the containers are in good condition. The containers are labeled and undergo a quality control review prior to being transported by Veolia personnel to the Veolia facility. Alternatively, the waste containers are inspected, managed and delivered to the facility directly by the generator or a third party company, provided they satisfy the Waste Analysis Plan requirements in Section D. No materials are accepted at the facility unless an approval for the wastes has been obtained from the ultimate disposal facility.

An additional quality control check is conducted when the materials arrive at the Veolia facility. The quality control check consists of a manifest review, as well as a visual review of all containers. Following inspection, the containers are placed within trailers designated for authorized disposal facilities or within trailers used for storage only. Alternatively, the contents of the containers are transferred into other containers, such as roll-offs and cargo tanks provided certain conditions are satisfied as outlined in Section P. All trailers are routinely inspected to ensure that there is no damage to the structural integrity of the vehicle.

Certain storage trailers are assigned disposal site destinations and then loaded with containers requiring treatment or disposal at that off-site facility. Storage of materials of varying hazard class is conducted in accordance with the Department of Transportation (DOT) segregation requirements of 49 CFR §177.848, "Segregation Table for Hazardous Materials", with the additional constraint that all acids are stored in a different containment quadrant than bases. Veolia maintains compliance with DOT requirements by utilizing multiple trailers to assure proper separation and segregation of diverse hazardous materials.

II. Storage of Ignitable or Reactive Wastes in Containers

As required, all hazardous waste containers holding ignitable or reactive wastes are stored a minimum of 50 feet from the property line for areas zoned industrial. Zoning designation of surrounding properties is included in the figure in Attachment A-4b. Ignitable, incompatible, and reactive waste are stored 200 feet from the property boundary adjacent to properties that are not zoned industrial.

III. Management of Incompatible Wastes in Containers

Veolia utilizes containers that are made of or lined with materials that will not react with and are otherwise compatible with the hazardous wastes to be stored. Therefore, the ability of the container to contain waste will not be impaired due to contact with the waste. Veolia field personnel physically package and conduct a quality control check of pre-packaged material on the generator's site prior to shipment to the Veolia facility. All materials are packaged according to the Department of Transportation (DOT) packaging requirements in DOT acceptable containers. Alternatively, for wastes packaged and shipped by third party personnel, Veolia inspects the containers at the time of waste receipt at the facility to ensure that the containers are in acceptable condition for storage and/or transfer. Incompatible wastes or incompatible wastes and materials are not placed in the same containers. Furthermore, Veolia will not place hazardous waste in an unwashed container that previously held an incompatible waste or material.

IV. Dikes and Berms to Separate Incompatibles

Containers are stored and prepared for transport in trailers, or in other waste containers such as roll-offs or cargo tanks, that are parked on contained reinforced concrete areas. The trailers used are typically 8 to 8 1/2 feet wide and 48 to 53 feet long (in compliance with DOT). The trailers are backed-up to the east and west sides of the loading dock. The loading dock is 24 feet wide by 130 feet long and is able to accommodate up to twenty (20) trailers or other units (e.g., roll-

offs, cargo tanks, etc.) provided that sufficient secondary containment capacity as required by 40 CFR §264.175 is maintained in each independent quadrant.

The specifications for the loading dock are found in Attachment A1 and A2 (Site Drawings 1 and 2). The storage trailers may contain various combinations of container types and waste types depending upon the requirements for their acceptance at the ultimate disposal facility. At no time are the containers stored in a manner or so arranged as to pose a threat to human health and the environment. The storage of hazardous waste containers is performed in accordance with the DOT segregation requirements of 49 CFR §177.848 with the additional condition that acidic materials are stored in a separate secondary containment quadrant from basic materials. Similarly, the loading of hazardous waste containers for transportation is conducted in accordance with the segregation requirements in 49 CFR §177.848, "Segregation Table for Hazardous Materials".

The loading dock and trailer storage area is designed with a secondary containment system consisting of a concrete base and trench system with sufficient capacity to contain a minimum of 10% of the maximum volume of containers, or the volume of the largest container, whichever is greater. The concrete base slopes on either side of the loading dock towards a concrete containment trench. A 4" wide separation curb constructed of concrete divides the base on each side of the dock into two distinct quadrants. Similarly, the trench is divided into two sections on each side by a 6" valve that normally remains in the closed position. This system design results in four (4) independent containment systems that allows for the safe separation of incompatible wastes.

The specific methods of hazardous waste segregation include the following:

- Wastes are stored in different trailers within the same quadrant, utilizing the trailer walls as the method of segregation;
- Wastes are stored in different trailers within the same quadrant, and one of the trailers is outfitted with a liner or pan so that the trailer itself is afforded with secondary containment;

- Wastes are stored in separate quadrants where each quadrant has its own secondary containment;
- Waste are stored on pallets or skids that are designed with secondary containment capabilities, or in a larger container or device whose design provides adequate secondary containment based upon the total free liquid volume within, and stored in the same trailer as other wastes.

Due to the inherently safe design of labpacks that prohibit leakage in the event of breakage of an inner receptacle, the outer container of a labpack provides a segregation barrier between the hazardous materials inside and the other hazardous materials in containers in the immediate vicinity. As an additional precaution, incompatible labpacks (i.e., corrosive acids corrosive bases or cyanides) stored on the same trailer are placed on different pallets and separated by at least one pallet width buffer (that is empty or contains labpacks which are compatible with the materials stored on both sides).

Section K

Traffic

(§270.14(b)(10))

The primary vehicular access to the facility is from interstate 85 to Route 56 East (NC56). I-85, a divided highway with two 12-foot travel lanes in each direction is designed to carry high volume trucks and passenger vehicles. NC56 is a heavily traveled road with three asphalt lanes, one travel lane in each direction and a center lane for turns. Vehicles approaching the facility depart I-85 at exit 191 and proceed onto NC56. Vehicles proceed approximately 0.25 miles eastbound and turn right (south) onto East Lyon Station Road (SR 1108). East Lyon Station Road has 20 feet of bituminous treated pavement surface with earthen shoulders. Vehicles proceed .9 miles south on SR 1108 (which turns into SR 1104) and turn right onto SR 1106, Will Suitt Road. Both State Routes 1104 and 1106 have 20 feet of bituminous treated pavement surface with earthen shoulders. Vehicles turn right (west) onto SR 1106 and proceed approximately 0.1 miles to entrance to the facility located on the left (south) side of the road.

According to a State of North Carolina Department of Transportation letter obtained at the time the facility was constructed (Attachment K1) all intersections on the routes listed above have good sight distances and there are no restrictions or discernible problems on any of the routes. There has been no significant construction on the routes that would impact the sight distances and there remain no restrictions or problems on these site access routes. A map indicating transportation routes is shown on the map in Attachment K2.

The facility access drive, constructed of 2” asphalt over 3” of binder over 6” of compacted ABC stone, is controlled by a 24’ sliding gate as shown on Attachment A1 and A2 (Site Drawings 1 and 2). The drive is constructed of 2” asphalt over 3” of binder over 6” of compacted ABC stone. An emergency evacuation drive exits onto SR1104 (see Site Drawing 2). This drive, controlled by a swing gate, is primarily reserved for emergency evacuation.

There are five (5) major classes of vehicles approaching the facility: 1) passenger vehicles, 2) straight trucks, 3) tractor trailers, 4) roll-off units or dump trailers, and 5) cargo tanks.

A. Passenger Vehicles

The Veolia workforce consists of approximately 20-30 employees including management, administrative, sales, environmental, health and safety, technical, facility and field personnel. This results in approximately 20-30 round trips per day. In addition, there are approximately 5 round trips per day generated by vendors or clients. All passenger vehicles enter the facility through the State Route 1106 access drive and proceed to the vehicle parking areas in the front of the office building. Handicapped parking spots are designated.

B. Straight Vans and Trucks

There are approximately 4 round trips per day of vehicles characterized as straight trucks and vans. Veolia field personnel depart the facility in the straight trucks destined for the generator's site. After meeting the Veolia acceptability criteria, the materials are packaged in accordance with DOT, EPA and NCDEQ regulations. The DOT acceptable containers are then transported back to the Veolia facility in accordance with all DOT regulations.

Straight trucks transporting manifested waste shipments enter the facility through the access drive off SR 1106. Vehicles enter the active portion of the facility and are backed up to an empty spot at the loading dock. The paved access drive extends to 60 feet in width within the active portion of the facility thereby allowing sufficient space for vehicles to maneuver.

C. Tractor Trailers

There are normally one or two pick-ups or deliveries per day in trailers of a size up to 53 feet in length, on their way to or from an approved disposal site or Veolia customer

location. The trailers, depending upon length, can carry approximately 92 55-gallon drums or 24 pallets of other DOT acceptable containers.

D. Roll-off Boxes or Dump Trailers

Movement of roll-off units and dump trailers to and from the facility occurs on a less frequent basis, and normally does not exceed 3 units per week.

E. Cargo Tank Motor Vehicles

The movement of cargo tank motor vehicles to and from the facility also occurs on a less frequent basis, and normally does not exceed 3 vehicles per week.

In sum, transportation operations at the facility do not, nor are they expected to in the near future, have a notable effect on traffic in the area.

ATTACHMENT K1

RECEIVED
9-22-88

STATE OF NORTH CAROLINA
DEPARTMENT OF TRANSPORTATION

P. O. Box 15580
Durham, North Carolina 27704

September 20, 1988

JAMES G. MARTIN
GOVERNOR

JAMES E. HARRINGTON
SECRETARY

DIVISION OF HIGHWAYS

GEORGE E. WELLS, P.E.
STATE HIGHWAY ADMINISTRATOR

Ms. Elise Lechner
Environmental Engineer
AETC
P. O. Box 13886
Research Triangle Park, NC 27709

Dear Ms. Lechner:

We have completed our evaluation of the access routes to AETC's new facility located at the corner of SR1104 and SR1106 in Granville County near Butner. The main routes, map attached, to your site will be Interstate 85. Vehicles approaching the facility will exit at Exit 191 onto NC56, proceed approximately 0.25 miles to SR1108 (Telecom Drive). Vehicles proceed 0.9 miles south on SR1108 which becomes SR1104 and then turn right onto SR1106. The access drive to your site is approximately 0.1 mile from the intersection of SR1104 and SR1106.

Regarding the information you requested, Interstate 85 is designed to carry high volume truck and passenger vehicles. The travelway consist of two 24 feet wide lanes one in each direction with paved shoulders. The pavement surface is asphalt. NC 56 has three asphalt lanes, one travel lane in each direction with a center lane for turns. SR's 1108, 1104 and 1106 have 20 feet of bituminous treated pavement surface with earth shoulders.

All the intersections on the above routes have good site distances. There are no restrictions on any of the routes and no discernible problems.

If we can be of further assistance, please advise.

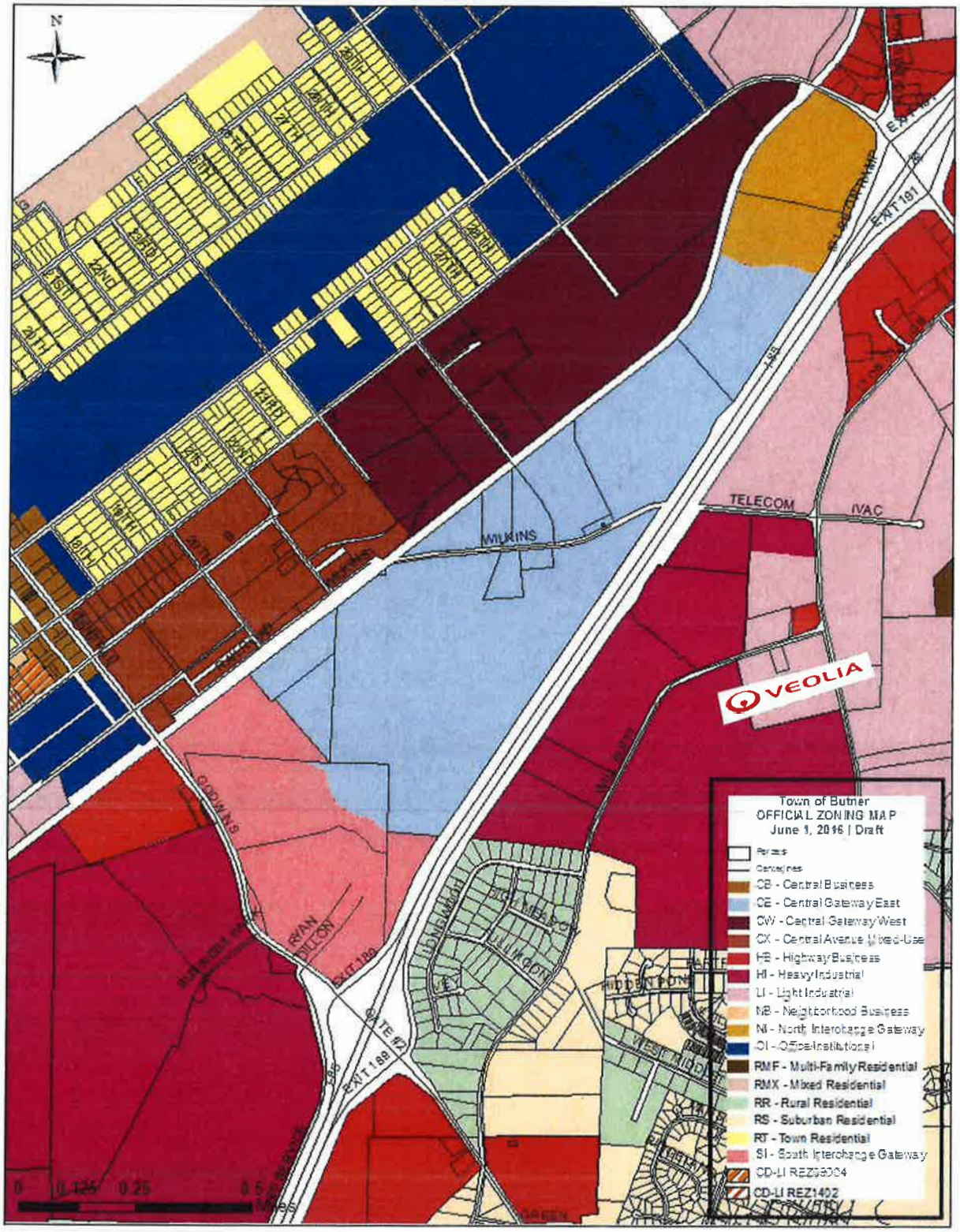
Sincerely,

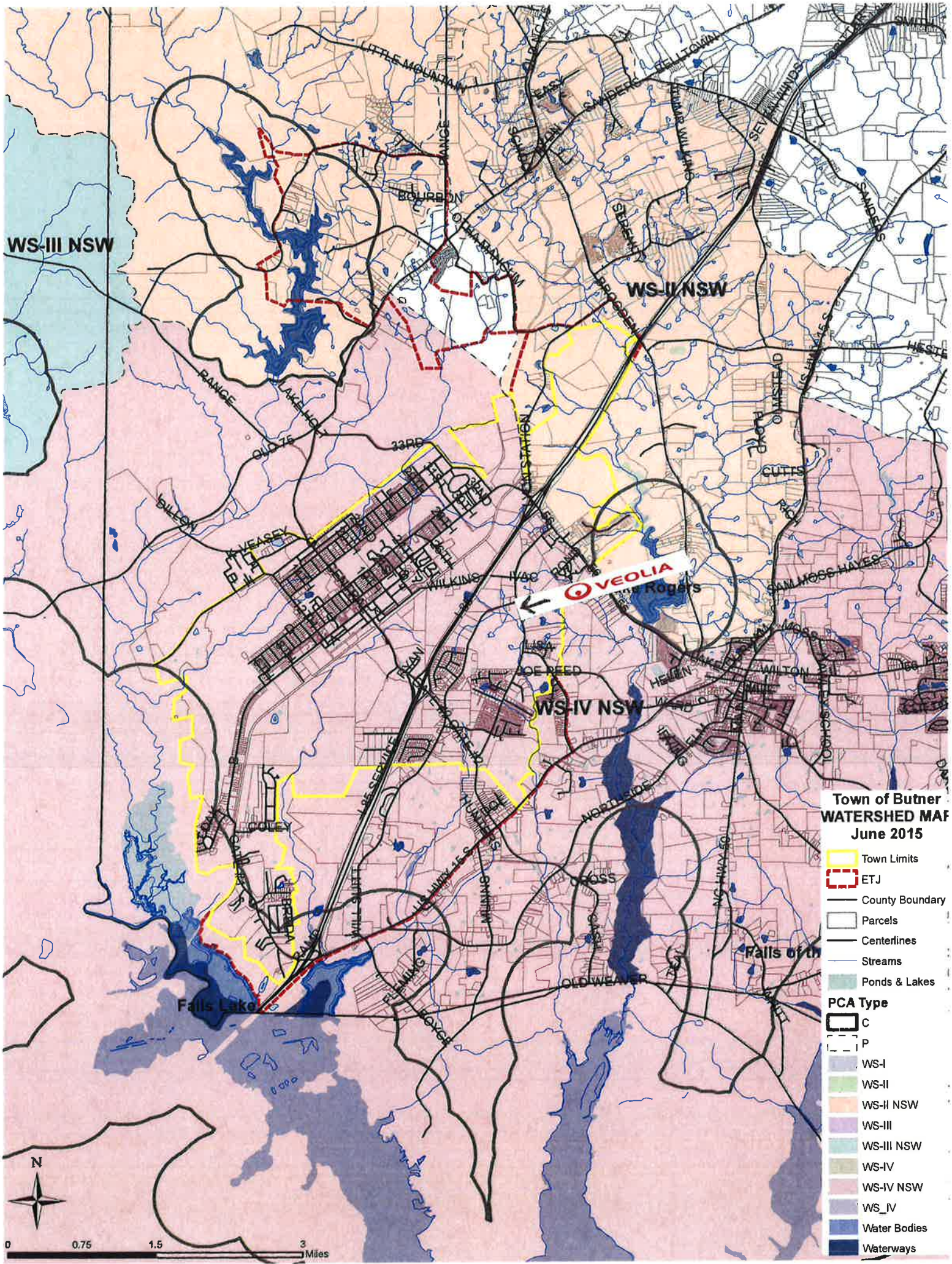
L. E. Stegall, P.E.
Division Engineer

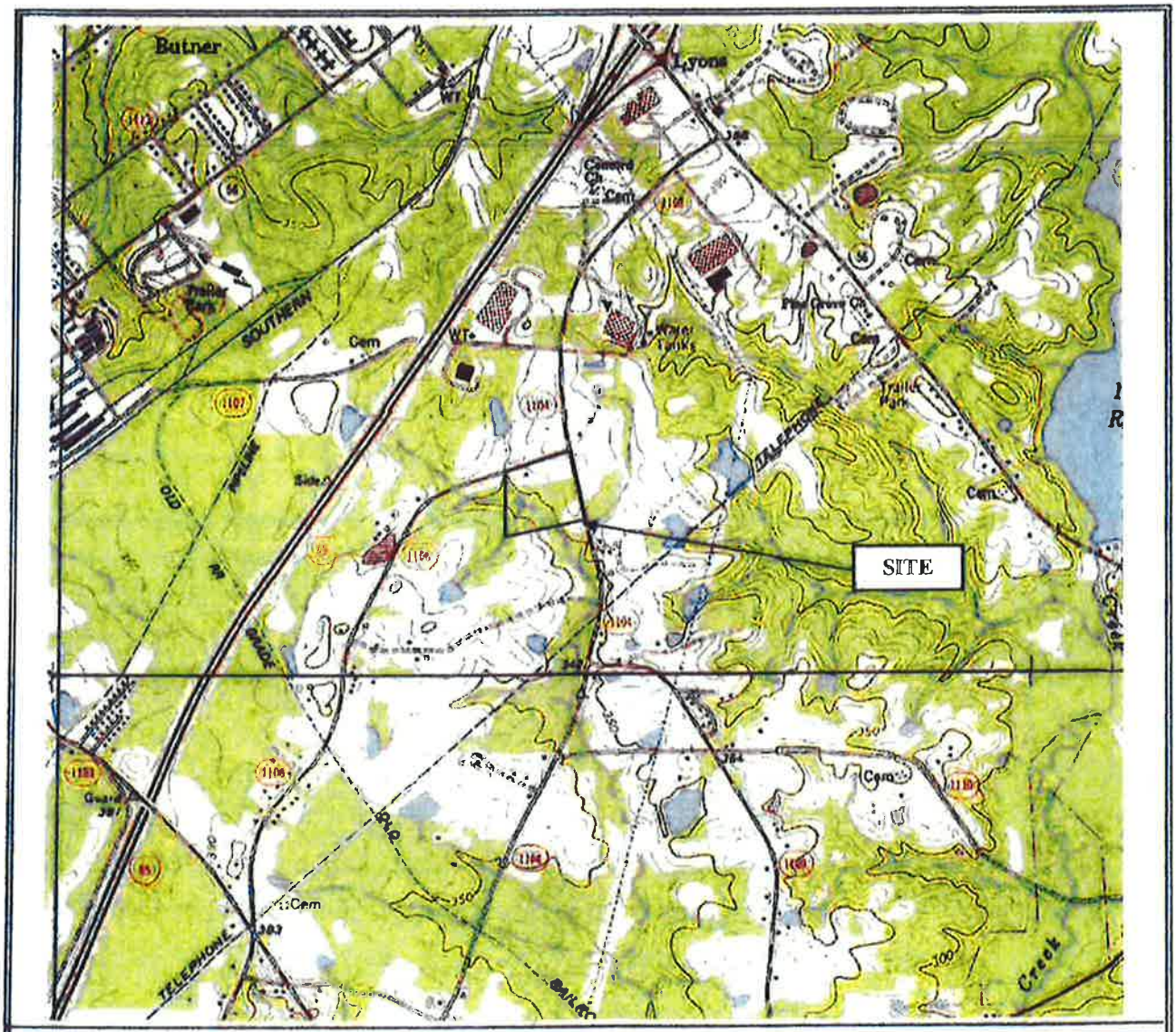
ESR:dh

Attachment

Butner Gateway Zoning Map




WS-III NSW
WS-II NSW
WS-IV NSW
VEOLIA
Falls Lake
Town of Butner
WATERSHED MAP
June 2015
Town Limits
ETJ
County Boundary
Parcels
Centerlines
Streams
Ponds & Lakes
PCA Type
C
P
WS-I
WS-II
WS-II NSW
WS-III
WS-III NSW
WS-IV
WS-IV NSW
WS_IV
Water Bodies
Waterways
N
0
0.75
1.5
3
Miles



STEM, N. C.
NW/4 CREEDMOOR 15' QUADRANGLE
36078-B6-TF-024

1974
PHOTOREVISED 1987
DMA 5256 II NW-SERIES V842

CREEDMOOR, N. C.
SW/4 CREEDMOOR 15' QUADRANGLE
36078-A6-TF-024
PHOTOINSPECTED 1990
1974
PHOTOREVISED 1987
DMA 5256 II SW-SERIES V842

NORTH

N.C.

CONTOUR INTERVAL 10 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929
1000 0 1000 2000

amec foster wheeler
Amec Foster Wheeler
Environment & Infrastructure, Inc.
4021 Stirrup Creek Drive, Suite 100
Durham, North Carolina 27703

TOPOGRAPHIC SITE MAP
VEOLIA ES TECHNICAL SOLUTIONS
CREEDMOOR, NORTH CAROLINA

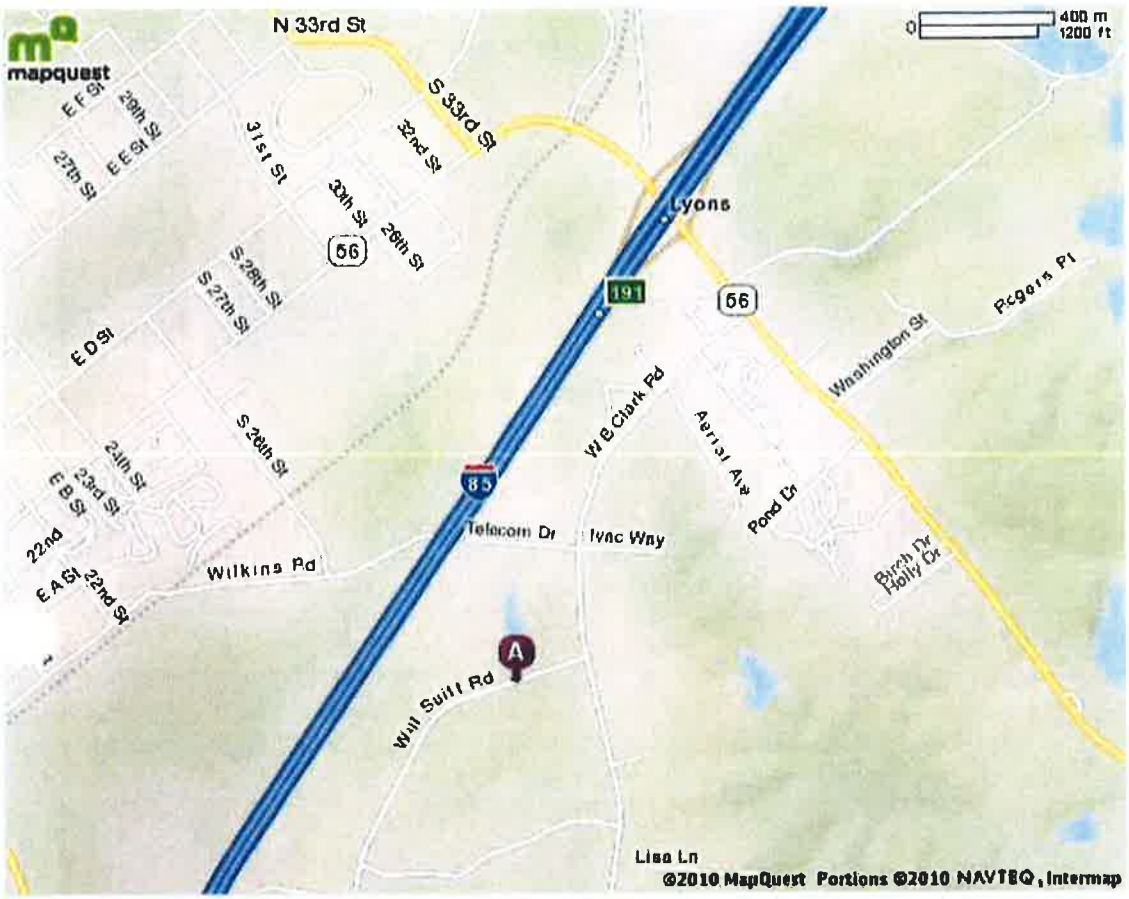
DRAWN: R.R.	DATE: APRIL 2015	FIGURE
ENG CHECK:	SCALE: 1 : 24000	1
APPROVAL:	JOB: 6470-12-1039	

MAPQUEST

I. of 2176 Will Suitt Rd
Creedmoor, NC 27522-8160

Notes

Access routes to the Veolia facility from Interstate 85. Exit 191 onto NC56 and proceed approximately 1/4 mile to W B Clark Road and turn right. Proceed approximately 1 mile to Will Suitt Road and turn right. Veolia facility is on the immediate left.



Section L

Location Standards

(§264.18 and §270(b)(11))

Veolia has reviewed the site in relation to existing environmental conditions of the region and has assessed the environmental impacts of the facility operations. The location standards of North Carolina Hazardous Waste Regulations found throughout 15A NCAC 13A .0109(c) and .0109(r) served as a reference.

I. General Site Information

The facility encompasses approximately 5 acres situated on the corners of State Routes 1104 and 1106 in Dutchville Township, Granville County, North Carolina. The site is located on the west side of SR 1104 and the south side of SR 1106.

The site contains one 6,000 ft^2 administrative building and one 10,000 ft^2 warehouse. A 3,120 ft^2 loading dock extends from the southern portion of structure. The entire loading dock and containment area is roofed. The existing structure is utilized by Veolia for the storage and consolidation of hazardous and non-hazardous industrial wastes. Prior to the development of the site and construction of the existing structures, the site was a vacant field and woodland.

The main access route to the site is provided off SR 1106; all traffic enters and exits the facility from the main drive. An additional drive exits onto SR 1104, but this drive is designated for emergency evacuation. The trucking/operations area is located on the southern portion of the site.

The secondary containment system consists of a concrete base and concrete trench system. The containment system has been designed to prevent run off from the active portion of the facility. The active portion of the facility is roofed and the paved area is graded away from the active portion to prevent run-on as detailed on Attachment A2, Site Drawing 2. In addition, the area along the perimeter of the drives, parking lots and facility are curbed. Water for domestic purposes is provided by a connection to the Butner water line on SR 1104 right of way. The

facility is also connected to the Butner sanitary sewer line for domestic sewage. An 8-foot high chain link fence topped with razor wire surrounds the perimeter of the active portion of the facility restricting access as shown on Attachment A1 and A2, Site Drawings 1 and 2.

II. Existing Environmental Conditions and Impact Assessment

The following sections present a review of existing site conditions and an assessment of the impact of site operations upon each major environmental resource including: air quality, soils and geology, water quality, drainage and hydrology.

A. Hydrological and Geological Information

1. Flood Plain

The area is not within a flood plain as indicated on the National Flood Insurance Maps produced by the Federal Insurance Administration of the Emergency Management Agency. A 100-year flood plain flood hazard boundary map is included as Attachment L1. As shown on the flood plain map, the Veolia facility is located over a mile away from any special flood hazard area.

2. Hydrogeology and Geological Properties

The depth to the water table is approximately 30 feet. The average seasonal and long-term groundwater level fluctuation is estimated at approximately 2 feet. For further details on the groundwater on-site, see the groundwater monitoring well installation sheets (Attachment L2).

3. Separation Distances from Waters

According to the Division of Natural Resources and Community Relations - Groundwater Section, there are no sole source drinking water aquifers in North Carolina. A site investigation has revealed no surface water streams with continuous flow or surface water

impoundments within 200 feet of the facility. According to the Division of Natural Resources and Community Relations - Regional Engineer, the facility is not in an area that will allow direct surface or subsurface discharge to AI, AII, or SA waters (WSI, WSII, WSIII) or a class III Reservoir. Likewise, the facility is not in an area that will allow direct surface or subsurface discharge to the watershed for a Class I or II Reservoir. The facility is located approximately 1 1/2 miles below the Lake Rogers Watershed.

4. Well Water Users Within One (1) Mile of the Site

Veolia has researched public records for the potential for nearby residents or property owners to have active drinking water wells. In recent years there has been a notable expansion of the public water supply in this area to the point at which it is now generally assumed that all nearby residences have access to a Public Water Supply. However, records provided by the county water utility indicate that one drinking water well is located on the property approximately ¼ mile west of the facility. The approximate location of this well is indicated on map "Site 4B".

With regards to the depth of any existing wells in this area, it is believed that the depth of drinking water wells range from 65 feet to 150 feet.

5. Water Quality

According to a Division of Natural Resources and Community Relations - Regional Engineer, groundwater quality was classified as GA - suitable for drinking at the time of the initial permit application submittal. The Veolia operations has not had, nor will it have a significant impact upon either surface or groundwater quality.

Containerized materials are stored in closed trailers or other units within the secondary containment area. The secondary containment system is designed to contain 10% of the capacity of containers or the volume of the largest container, whichever is greater. There is no tank storage or impoundments on-site. The entire active portion of the site (i.e., loading dock and containment area) is under roof, and therefore, no rainwater contacts any of the waste materials stored and handled. There are no injector wells or intake and

discharge structures either on-site or within ¼ mile of the facility property (refer to map "Site 4B").

Small amounts of common roadway and parking lot contaminants (e.g., salt, oils, gasoline, and rubber) may be carried away from the facility in the stormwater runoff; however, these contaminants are minimized in accordance with the facility's Stormwater Pollution Prevention Plan, as required by the facility's NPDES permit. Runoff water flows with the grade as shown on Attachment A2, Site Drawing 2. Water flows away from the containment area and toward the southern portion of the site and curb cuts. Absorbent booms would be placed across the curb cuts in the unlikely event of a significant spill occurring outside the containment area. To date, a spill outside of the secondary containment has never occurred at the facility.

6. Soils

A review of the soil mapping for Granville County shows that the facility lies on the Creedmoor Soil Series. An area soils map and soil interpretation records for the Creedmoor soils are provided in Attachment L3. These records include such information as soil pH, soil composition and permeability. Slopes for the Creedmoor Series Soils range from 0 to 2 percent. The Creedmoor series consists of moderately well drained and somewhat poorly drained, very low permeable soils. The soil survey was able to provide some general cation exchange capacity (CEC) information on the clays common to the area. Specifically, Kaolonitic clays have a CEC of approximately 8 meg/100 grams, montmorillonitic clays 100 meg/100 grams and vermiculite 150 meg/100 grams.

Veolia conducted a subsurface investigation of the site in 1988. Results of this investigation as well as soil boring information are included as Attachment L4. A map showing the boring locations is included as the last page in Attachment L4. Areas of the site that are not covered with the building, concrete containment areas or pavement are either landscaped or remain in natural form. The facility's operation does not involve the storage of materials in underground tanks. The facility has not adversely impacted the soils and geology of either the site or the surrounding area.

7. Seismic Areas

The area is not in one of the political jurisdictions listed by the US EPA (40 CFR 264, Appendix VI) as being an area of seismic risk.

8. Mines, Caves, or Cavernous Bedrock

A field investigation and review of the USGS Stem Quadrangle Map has indicated that there are no mines, caves, or cavernous bedrock within 200 feet of the facility.

B. Wetlands

The US Fish and Wildlife Service, National Wetlands Inventory (Attachment L5) for the area does not indicate any wetlands, submerged areas and bogs within the vicinity of the site. A review of the soils mapping of Granville County indicates that the facility lies on the Creedmoor Soils Series, which is not a hydric soil. Based on this information, it is believed that the facility has no impact on wetland areas.

C. Climatological Factors

The Raleigh area enjoys a favorable climate. Temperatures average 60^{o} F, with a monthly average high of approximately 78^{o} F in July and an average low of 41^{o} F in January. The prevailing wind direction is from the southwest. The moderate climate in the area has not, and is not expected to have a significant impact on facility operations.

D. Critical Habitats and Natural Areas

Attachment L6 is a letter dated August 17, 1988, from the North Carolina Natural Heritage Program. This letter acknowledges that there are no records of rare or endangered plant and animal species or natural areas at the site. The nearest site of rare plant species is approximately one mile East North East of the facility. Based on this

information, it is not anticipated that there will be a negative impact on endangered plant or animal species, or natural areas by continuing hazardous waste management operations at the facility.

E. Historical and Archeological Resources

Attachment L7 is a letter dated August 15, 1988 from the North Carolina Department of Cultural Resources, Historic Preservation Section. This letter acknowledges that there are no properties of architectural, historical or archeological significance that would be affected by the operation of the facility. Since Veolia does not intend to expand operations beyond the current perimeter, this determination appears to remain accurate.

F. Air Quality

In March 2009, the (DAQ) Division of Air Quality, recommended that the federal government designate 24 counties, including Granville County, as not meeting the new federal air quality standard for ozone. Although the area is considered a non-attainment area for ozone, the Veolia operations have minimal impact on the ozone air quality. The air emissions from wastes on-site are minimal because the waste is managed in closed containers. Air emissions from any containers opened for the purposes of consolidation are also minimized through the implementation of operational controls as required by EPA's Subpart CC container requirements. The largest impact on the ozone air quality would be from general truck and employee vehicle traffic, which as outlined above, has minimal impact on the ozone air quality in the area. Thus, continuing operations at the facility is not anticipated to negatively impact air quality in the area.

G. Separation Distances [15A NCAC 13A .0109(r)(2)]

1. <u>Schools, Health Care Facilities and Prisons</u>

The nearest institution is a small private day care center located on the commercial property north of the facility, directly across Will Suitt Road. Other than this business,

there are no other institutions including public schools, health care facilities and/or prisons located within 0.25 miles of the site. The nearest public schools, located in Creedmoor and Butner are at least 3 miles from the site. Vance Granville Community College is located approximately 0.7 miles from the facility. The nearest health care facility, Murdoch Hospital located near Butner, is approximately 2 miles from the site location. John Umstead Hospital, located in Butner is approximately 3.4 miles from the site. Due to the distance of these facilities, other than the day care center, from the site, it is not anticipated that continuing operations at the site will negatively impact these facilities. With respect to the day care center on Will Suitt Road, its presence as an institution of concern has been noted in the contingency plan. As such, in the event of an emergency that could impact off-site properties, Veolia will take appropriate actions to promptly notify the day care center operator and minimize to the extent possible any impact to that business.

2. Park and Forests

There are no parks within one mile of the site. The area adjacent to the property on the southern portion of the site, which is also owned by Veolia, is wooded. Facility operations have had no significant impact on this wooded area.

3. Buffer Zone

All hazardous wastes are stored a minimum of 50 feet from the property line. The Veolia facility is zoned LI Light Industrial according to a July 13, 2010 email from Melissa Hodges, Butler Town Planner, Parks and Recreation Director (Attachment L8). The 50-foot buffer zone is shown on Attachment A1, Site Drawing 1.

H. Aesthetics and Noise Characteristics

Facility operations do not contribute any significant sources of noise. The major source of noise in the area is due to vehicular traffic and container handling operations, neither of which is significant. Although the area in which the facility is located is zoned

industrial, the setting remains rural and largely undeveloped. There are no activities that significantly contribute to the noise levels outside of the perimeter of the facility.

The current structure on the site location was designed and constructed to be consistent with other land uses and industrial establishments in the vicinity, and does not alter the character of the area. An eight-foot high chain link fence surrounds the facility on the southern, eastern, and western sides. Landscaping is provided and building architecture was designed to provide a professional office appearance.

I. Traffic

The major access route to the facility is Interstate 85, a major north/south heavily traveled highway traversing North Carolina. Vehicles approaching the facility from the south exit I-85 at exit 191. The vehicles bear right (east) and proceed 0.2 miles on Route 56 east. Route 56 is a major east/west roadway traversing Granville County. The vehicles turn right onto East Lyon Station (SR 1108) and proceed 0.9 miles south. SR1108 turns into SR1104. Vehicles turn right (west) onto Will Suitt Road (1106), a two lane state road. The facility access drive is located on Will Suitt Road, approximately 0.1 mile west of the intersection of SR1106 with SR 1104. According to a North Carolina Department of Transportation letter dated 9-20-88, Attachment L9, the access roads provide good sight distances and there are no discernible problems with Veolia transporting materials on these roadways. Based on observations of the access roads to and from the facility, this information does not appear to have changed markedly as of 2010. A transportation route map is found in Attachment K2.

J. Socioeconomics

The facility has had, and continues to have a positive effect on the economics of the area. The facility continues to contribute annual property taxes to Granville County. A number of Veolia facility personnel reside in Granville County and support local business. Facility personnel provide technical assistance to local response teams as well as community organizations and schools. Veolia operations will continue to provide a

needed environmental service to public and private industries (both existing and new) and homeowners in Granville County.

K. Surrounding Land Use

The site is located in Dutchville Township, between Creedmoor and Butner in Granville County. The area adjacent to the south and west of the site is undeveloped land and to the north and east light industrial. The north and east perimeters of the property are bounded by State Routes 1106 and 1104, respectively. Residential housing exists within one mile of the site, but is not heavy. The nearest interchange is I-85 located approximately 1.2 miles from the site. The nearest commercial airport is the Raleigh Durham Airport located approximately 30 minutes from the site. There are 10 property owners within a ¼ mile perimeter of the facility and of these only one is a residence, the others are businesses. Refer to map Site 4B for the surrounding land uses within ¼ mile.

III. Consistency with Local, State and Federal Plans and Regulations

The Veolia facility has been, and will continue to be, operated in accordance with applicable local, state and federal regulations.

IV. Certification, Permits and Approvals

The Veolia facility is connected to the Butner Sewage Authority for domestic sewage. To date, there have been no violations or concerns communicated to Veolia by the Butner Sewage Authority.

Monitoring well installation permits were obtained from the NCDEQ (Attachment L10) prior to the installation of the three-groundwater monitoring wells on the facility premises. Well Construction records and monitoring well schematics are included as Attachment L2. Annual monitoring of the wells has not revealed the presence of any contaminants at levels of concern. This data is maintained at the facility and is available for review by interested parties during

normal operating hours. ~~Results of the most recent groundwater analysis conducted in March 2010 appear in Attachment Q-1~~.

A certificate of occupancy has been obtained from Granville County (Attachment L11).

The facility received its most recent National Pollutant Discharge Elimination System (NPDES) Stormwater Discharge Permit from NCDEQ on January 12, 2009. The new NPDES permit application has been submitted to NCDEQ in November 2013 due to the expiration date of January 2014. Veolia did receive a letter stating the permit application has been received, but there has been no new permit issued to the site to date.

V. Other Federal Laws

Veolia has designed and operates the facility in compliance with the following Federal Laws: Wild and Scenic Rivers Act, National Historic Preservation Act of 1966, Endangered Species Act, and Fish and Wildlife Coordination Act.

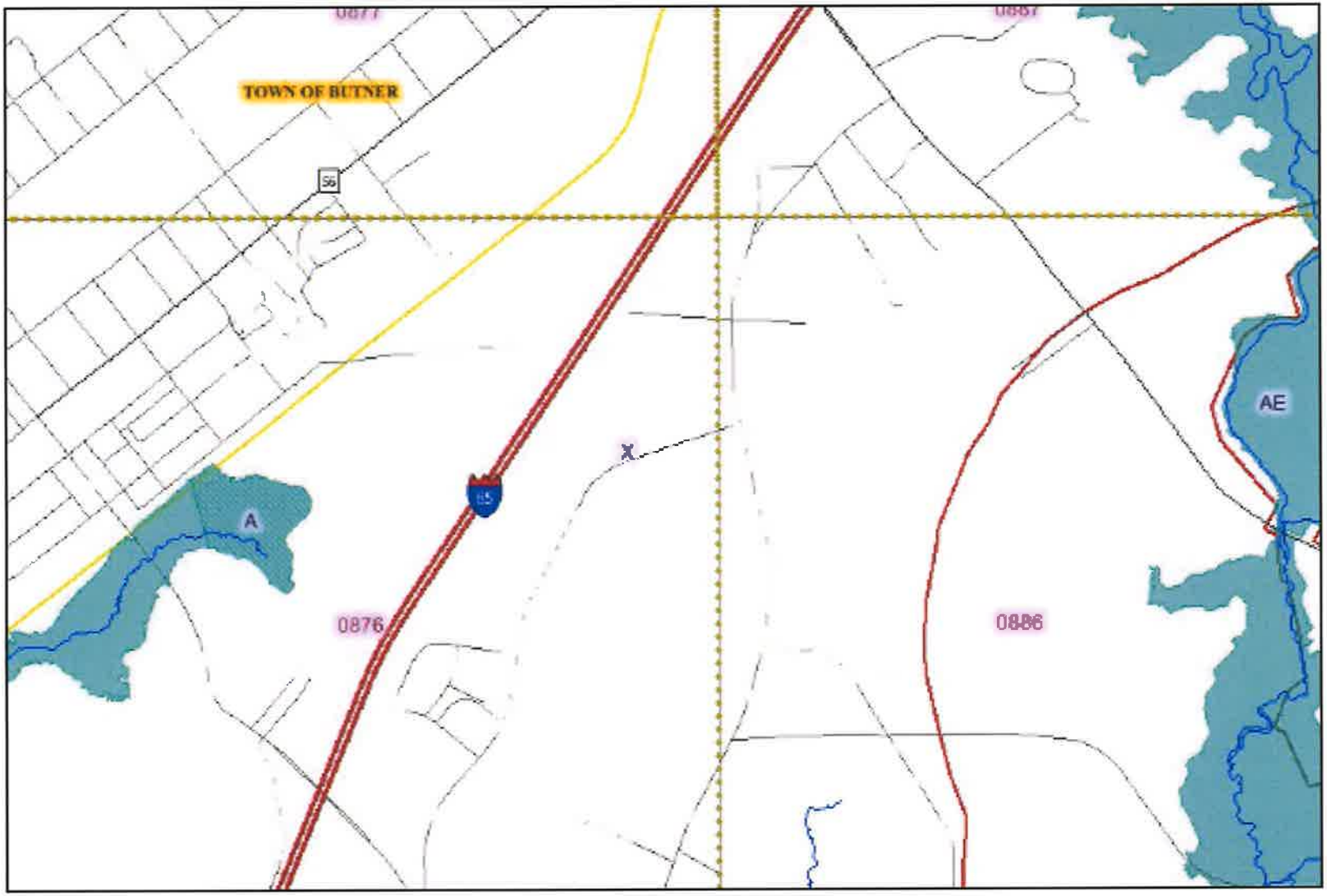
To date, there have been no releases of hazardous wastes from solid waste management units (SWMUs) located at the facility. Some small spills have occurred during routine container handling and storage operations but in all cases the spills and releases have been captured by the facility's secondary containment system and fully remediated. Thus, the Veolia facility does not contain any SWMUs that are currently undergoing corrective action.

VI. Public Costs

The Veolia facility has not had adverse economic impacts upon Dutchville Township or Granville County. There has not been, nor is it expected that there should be a need for an increase in the size of police, fire departments, school system, or roadway maintenance costs due to the operation of this facility. The establishment has created some jobs in the area, but not to the level that significantly impacts the economics of the community.

VII. Conclusion

This facility has not had a negative impact on human and environmental receptors (air quality, soils and geology, water quality, drainage and hydrology, etc.,) in the area surrounding the facility since the facility's permit to operate a hazardous waste storage and transfer facility was issued in May 1990. The facility provides a valuable service to the surrounding community and has done so without any significant incident during the past twenty years. Future operations at the facility are not expected to negatively impact human or environmental receptors in the surrounding area.



100yr Flooding - Has BFE's (AE)
100yr Flooding - Floodway (AE)
100yr Flooding - No BFE's (A)
100yr Flood - Velocity Zone (V or VE)
100yr Shallow Flooding (AO or AH)
100yr Future Conditions Flooding (X Future)
500yr Flooding (Shaded X)

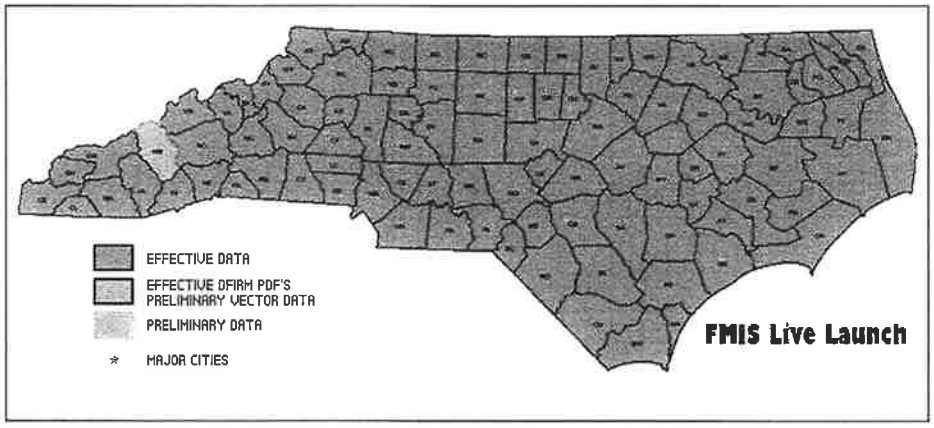
DFIRM Grid
Cross Sections
Rivers and Streams
Coastal Sounds
Coastal Barrier Resource Systems (CBRS)

Major Cities
Urban Areas
Extra Territorial Jurisdictions
Interstate Highway
US Highway
NC Highway
Roads

Benchmarks
Transects
Parks, Gameland, Forests, Reserves and Open Space

- Digital Flood Maps
- Data Download
- FIRM Indexes
- Status
- NFIP Questions
- Letters of Map Change
- Summary of Map Actions
- Basin Plans & Restudy Manual
- Links
- Contact
- Flood Warning Program
- NCFMP Program Information
- 2008 NFIP Quick Guide

FLOODPLAIN MAPPING INFORMATION SYSTEM [FMIS]



Click the image above to be redirected to the FMIS site. Data Download

This website is a free service provided by the State of North Carolina. The latest information on the Floodplain Mapping program is provided here. Learn about the State's partners in this project.

NEWS

Franklin County Receives New Flood Insurance Rate Maps
June 17, 2010

NEWS ARCHIVE

2010 • 2009 • 2008 • 2007 • 2006 • 2005 • 2004 • 2003 • 2002 • 2001 • 2000

LOCATION

NC Floodplain Mapping Program
1812 Tillery Place Suite 105
4719 Mail Service Center
Raleigh, NC 27699-4719

Phone: 919-715-5711

Further details under 'NEWS'

NORTH CAROLINA DEPARTMENT OF NATURAL RESOURCES AND COMMUNITY DEVELOPMENT
DIVISION OF ENVIRONMENTAL MANAGEMENT - GROUNDWATER SECTION
P.O. BOX 27687 - RALEIGH, N.C. 27611, PHONE (919) 733-6083

ATTACHMENT L2

Serial No. _____
Lat. _____ Long. _____ Pc _____
Minor Basin _____
Basin Code _____
Header Ent. _____ GW-1 Ent. _____

WELL CONSTRUCTION RECORD

DRILLING CONTRACTOR Soil and Material Engineers

DRILLER REGISTRATION NUMBER 412

STATE WELL CONSTRUCTION PERMIT NUMBER: 38-0107-WM 0022

WELL LOCATION: (Show sketch of the location below)

Nearest Town: Butner

County: Granville

(Road, Community, or Subdivision and Lot No.)

OWNER Advanced Environmental Technoloty Corp.

ADDRESS Gold Mine Road (Street or Route No.)

Flanders, New Jersey 07836 (City or Town / State / Zip Code)

DATE DRILLED 9/23/88 USE OF WELL Monitoring

TOTAL DEPTH 23.5' CUTTINGS COLLECTED ☐ Yes ☒ No

DOES WELL REPLACE EXISTING WELL? ☐ Yes ☒ No

STATIC WATER LEVEL: 4.5' FT. ☐ above ☒ below TOP OF CASING,

TOP OF CASING IS 2.5' FT. ABOVE LAND SURFACE.

YIELD (gpm): N/A METHOD OF TEST N/A

WATER ZONES (depth): Cuttings wet @ 19.0'

ORINATION: Type N/A Amount N/A

CASING:

	Depth From	Depth To	Diameter	Wall Thickness or Weight/Ft.	Material
From	+2.5'	3.0' Ft.	4"	SCH 10	Steel
From	+2.5'	13.5' Ft.	2"	SCH 40	PVC
From		To Ft.			

GROUT:

	Depth From	Depth To	Material	Method
From	0.0	10.0 Ft.	Cement	Tremie
From	10.0	13.5 Ft.	Bentonite	Pellets

SCREEN:

	Depth From	Depth To	Diameter	Slot Size	Material
From	13.5'	23.5 Ft.	2 in.	.010 in.	PVC
From		To Ft.	in.	in.	
From		To Ft.	in.	in.	

GRAVEL PACK:

	Depth From	Depth To	Size	Material
From	11.5	23.5 Ft.	Fine	Sand
From		To Ft.		

MARKS: Well installed through hollow stem auger

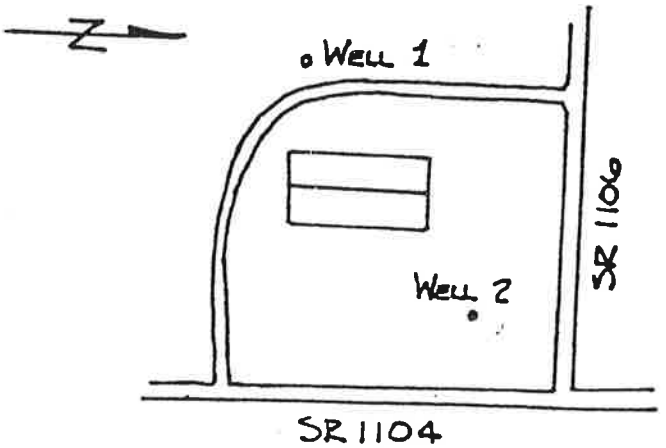
Depth From	Depth To	DRILLING LOG Formation Description
0.0' - 0.5'		Brown Silty SAND
0.5' - 5.5'		Yellow Brown Fine to Medium Sandy Silty Clay
5.5' - 23.5'		Gray Clayey Fine to Medium
23.5'		Boring Terminated, Well Set

If additional space is needed use back of form.

LOCATION SKETCH

(Show direction and distance from at least two State Roads, or other map reference points)

Well No. 2



I DO HEREBY CERTIFY THAT THIS WELL WAS CONSTRUCTED IN ACCORDANCE WITH 15 NCAC 2C, WELL CONSTRUCTION STANDARDS, AND THAT A COPY OF THIS RECORD HAS BEEN PROVIDED TO THE WELL OWNER.

Walter O Burnette 10/11/88

SIGNATURE OF CONTRACTOR OR AGENT DATE

GW-1 Revised 11/84

Submit original to Division of Environmental Management and copy to well owner.

Well Number: 4

Drilling Method: Hollow Stem Auger

Date Started: 9/23/88

Drilling Fluids: None

Date Finished: 9/23/88

Static Water Level: 4.5 BTOC Date:

Geologist/Engineer: Walter Beckwith

Observed By:

Remarks:

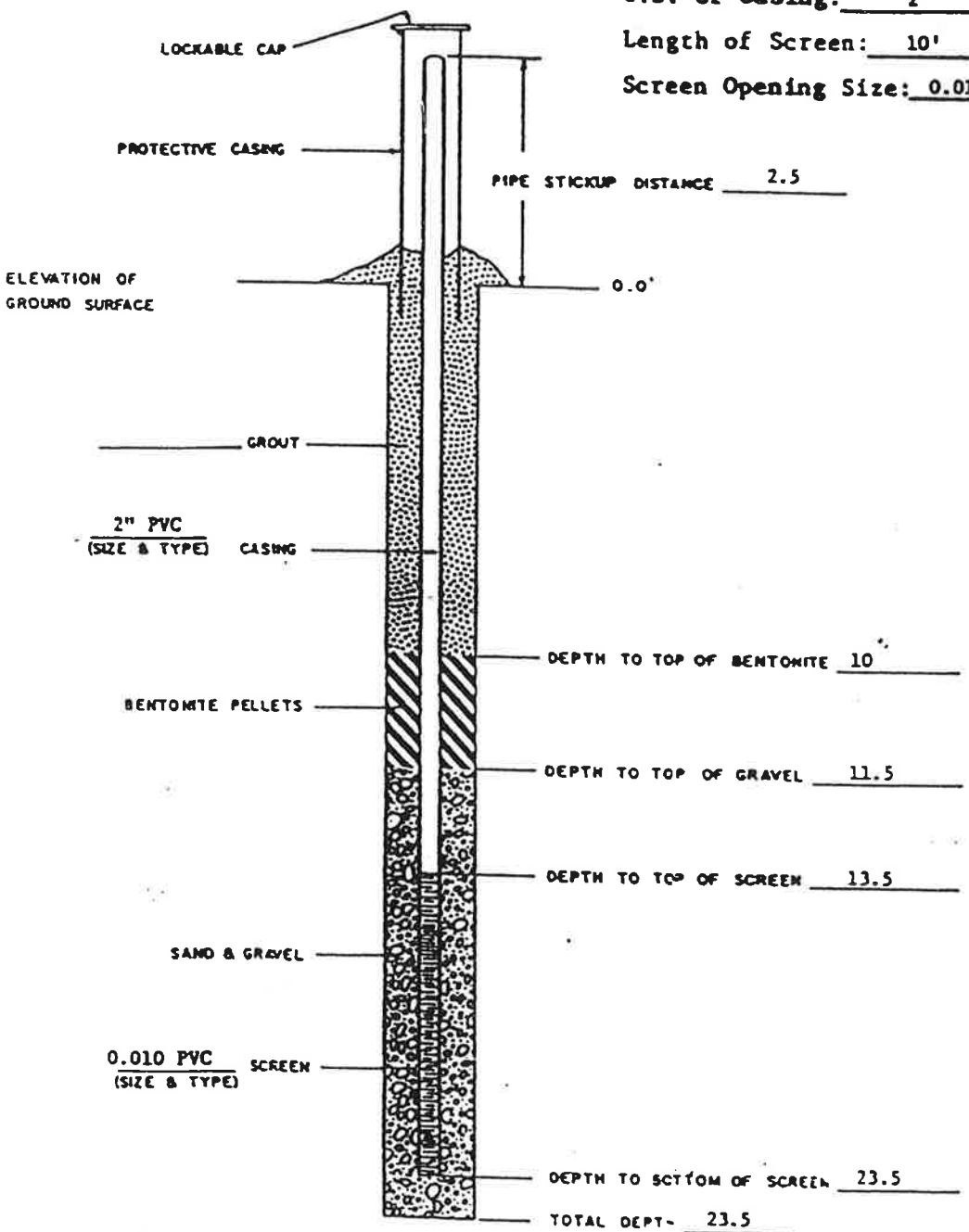
ALL DEPTHS REFERENCED FROM GROUND SURFACE

O.D. of Borehole: 6-8'

O.D. of Casing: 2"

Length of Screen: 10'

Screen Opening Size: 0.010"



PROJECT

Advanced Environmental

Westinghouse

SCALE: As Shown

JOB NO: 4112-88-1[illegible]

FIG. NO:

NORTH CAROLINA DEPARTMENT OF NATURAL RESOURCES AND COMMUNITY DEVELOPMENT
DIVISION OF ENVIRONMENTAL MANAGEMENT - GROUNDWATER SECTION
P.O. BOX 27687 - RALEIGH, N.C. 27611, PHONE (919) 733-6083

FOR OFFICE USE ONLY
Quad. No. _____ Serial No. _____
Lat. _____ Long. _____ Pc _____
Minor Basin _____
Basin Code _____
Header Ent. _____ GW-1 Ent. _____

WELL CONSTRUCTION RECORD

DRILLING CONTRACTOR Soil and Material Engineers
DRILLER REGISTRATION NUMBER 412
STATE WELL CONSTRUCTION PERMIT NUMBER: 38-017-WM 0022

1. WELL LOCATION: (Show sketch of the location below)
Nearest Town: Butner, North Carolina
County: Granville
(Road, Community, or Subdivision and Lot No.)
2. OWNER Advanced Environmental Technology Corp.
ADDRESS Gold Mine Road (Street or Route No.)
Flanders, New Jersey 07836
City or Town State Zip Code
3. DATE DRILLED 9/23/88 USE OF WELL Monitoring
4. TOTAL DEPTH 28.5' CUTTINGS COLLECTED ☐ Yes ☒ No
5. DOES WELL REPLACE EXISTING WELL? ☐ Yes ☒ No
6. STATIC WATER LEVEL: 5.4' FT. ☐ above ☒ below TOP OF CASING.
TOP OF CASING IS 2.0' FT. ABOVE LAND SURFACE.
7. YIELD (gpm): N/A METHOD OF TEST N/A
8. WATER ZONES (depth): Cuttings wet @ 20.5'
9. CHLORINATION: Type N/A Amount N/A

DRILLING LOG Depth From	To	Formation Description
0.0'	2.0'	Gray Slightly Sandy Silty CLA
2.0'	8.0'	Tan Gray Fine to Medium Slightly Clayey Silty SAND
8.0'	11.5'	Gray Fine to Coarse SAND
11.5'	21.0'	Red Brown Sandy Silt
21.0'	28.5'	Gray Weathered Rock
28.5'		Boring terminated, set well

If additional space is needed use back of form.

10. CASING:

	Depth From	To	Ft.	Diameter	Wall Thickness or Weight/Ft.	Material
From	+2.0'	3.0'		4"	SCH 10	Steel
From	+2.0'	18.0'		2"	SCH 40	PVC
From						

11. GROUT:

	Depth From	To	Ft.	Material	Method
From	0.0	15.0		Cement	Tremie
From	15.0	16.0		Bentonite	Pellets

12. SCREEN:

	Depth From	To	Ft.	Diameter	Slot Size	Material
From	18.0	28.0		2 in.	.010 in.	PVC
From				in.	in.	
From				in.	in.	

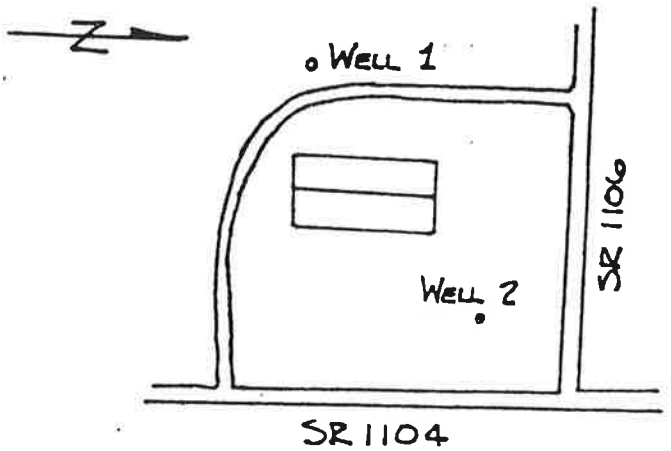
13. GRAVEL PACK:

	Depth From	To	Ft.	Size	Material
From	16.0	28.5		Fine	Sand
From					

REMARKS: Well installed through hollow stem auger

LOCATION SKETCH
(Show direction and distance from at least two State Roads, or other map reference points)

WELL NO. 1



I DO HEREBY CERTIFY THAT THIS WELL WAS CONSTRUCTED IN ACCORDANCE WITH 15 NCAC 2C, WELL CONSTRUCTION STANDARDS, AND THAT A COPY OF THIS RECORD HAS BEEN PROVIDED TO THE WELL OWNER.

Walter J. Balsewitz 10/11/88
SIGNATURE OF CONTRACTOR OR AGENT DATE

GW-1 Revised 11/84
Submit original to Division of Environmental Management and copy to well owner.

Drilling Method: Hollow Stem Auger

Date Started: 9/23/88

Drilling Fluids: None

Date Finished: 9/23/88

Static Water Level: 5.4 BTOC Date:

Geologist/Engineer: Matler Beckwith

Observed By:

Remarks:

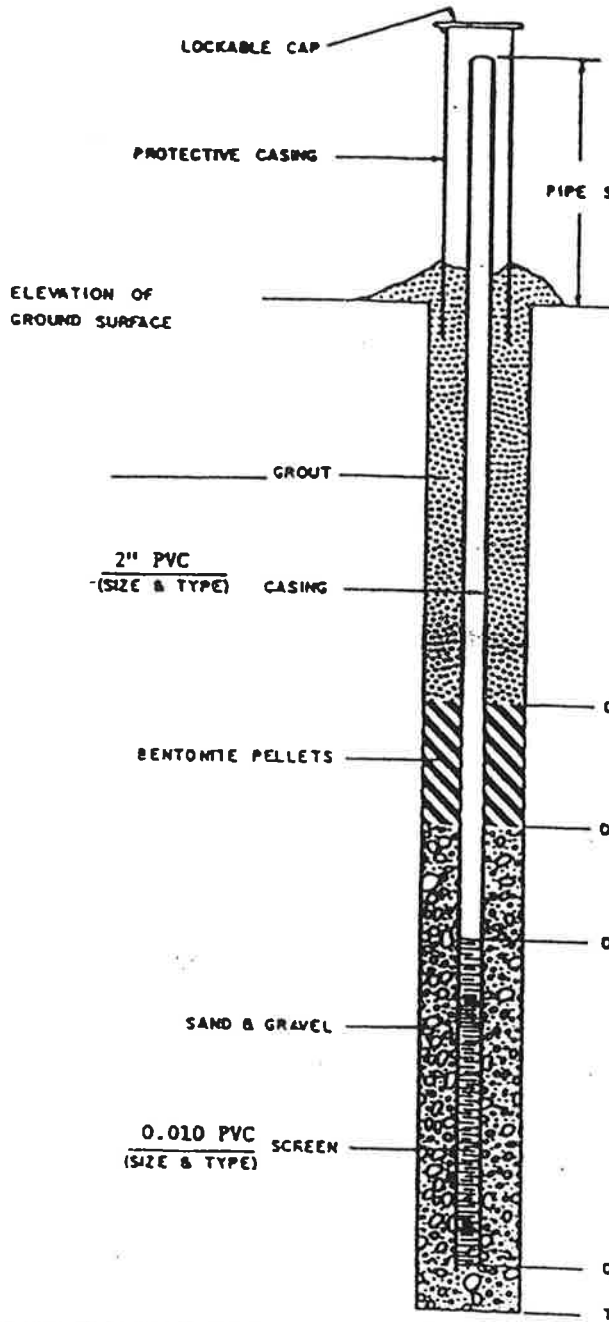
ALL DEPTHS REFERENCED FROM GROUND SURFACE

O.D. of Borehole: 6-8"

O.D. of Casing: 2"

Length of Screen: 10'

Screen Opening Size: 0.010"



PROJECT

Advanced Environmental

Westinghouse

SCALE: As Shown

JOB NO: 4112-88-142

FIG. NO:

NON RESIDENTIAL WELL CONSTRUCTION RECORD

North Carolina Department of Environment and Natural Resources- Division of Water Quality

WELL CONTRACTOR CERTIFICATION # 2593

1. WELL CONTRACTOR:
Richy Lemire
Well Contractor (Individual) Name
SAEDACCO
Well Contractor Company Name
STREET ADDRESS 9088 Northfield Dr.
Ft mill S.C 29715
City or Town State Zip Code
(803) 849-0353
Area code- Phone number

2. WELL INFORMATION:
SITE WELL ID #(if applicable)
STATE WELL PERMIT#(if applicable)
DWQ or OTHER PERMIT #(if applicable)
WELL USE (Check Applicable Box) Monitoring ☒ Municipal/Public ☐
Industrial/Commercial ☐ Agricultural ☐ Recovery ☐ Injection ☐
Irrigation ☐ Other ☐ (list use)
DATE DRILLED 2-6-07
TIME COMPLETED 4:30 AM ☐ PM ☒

3. WELL LOCATION:
CITY: Creedmoor COUNTY Granville
2176 will Swift Rd
(Street Name, Numbers, Community, Subdivision, Lot No., Parcel, Zip Code)
TOPOGRAPHIC / LAND SETTING:
☐ Slope ☐ Valley ☒ Flat ☐ Ridge ☐ Other
(check appropriate box)
LATITUDE 3 ___ ___
LONGITUDE ___ ___ ___
May be in degrees, minutes, seconds or in a decimal format
Latitude/longitude source: ☐ GPS ☐ Topographic map
(location of well must be shown on a USGS topo map and attached to this form if not using GPS)

4. FACILITY - is the name of the business where the well is located.
FACILITY ID #(if applicable)
NAME OF FACILITY Veolia Env. Technical Solutions
STREET ADDRESS 2176 will Swift Rd
Creedmoor N.C.
City or Town State Zip Code
CONTACT PERSON Will Grimes
MAILING ADDRESS Mactec 3301 Atlantic AVE
Raleigh N.C. 27604
City or Town State Zip Code
919-831-8016
Area code - Phone number

5. WELL DETAILS:
a. TOTAL DEPTH: 39
b. DOES WELL REPLACE EXISTING WELL? YES ☐ NO ☒
c. WATER LEVEL Below Top of Casing: ___ FT.
(Use "+" If Above Top of Casing)

d. TOP OF CASING IS 2.5 FT. Above Land Surface*
*Top of casing terminated at/or below land surface may require a variance in accordance with 15A NCAC 2C .0118.
e. YIELD (gpm) ___ METHOD OF TEST ___
f. DISINFECTION: Type ___ Amount ___
g. WATER ZONES (depth)
From ___ To ___ From ___ To ___
From ___ To ___ From ___ To ___
From ___ To ___ From ___ To ___

6. CASING:

	Depth		Diameter	Thickness/ Weight	Material
From -2.5	To 29	Ft.	2"	Sch 40	PVC
From ___	To ___	Ft.			
From ___	To ___	Ft.			

7. GROUT:

	Depth		Material	Method
From 0	To 25	Ft.	Portland	Tremmie
From ___	To ___	Ft.		
From ___	To ___	Ft.		

8. SCREEN:

	Depth		Diameter	Slot Size	Material
From 29	To 39	Ft.	2" in.	010 in.	PVC
From ___	To ___	Ft.	___ in.	___ in.	
From ___	To ___	Ft.	___ in.	___ in.	

9. SAND/GRAVEL PACK:

	Depth		Size	Material
From 27	To 39	Ft.	#2	SAND
From ___	To ___	Ft.		
From ___	To ___	Ft.		

10. DRILLING LOG

From	To	Formation Description
0	11	White Silty SAND
11	31	Brown Silty Dry SAND
31	41	Hard Dry silty SAND with P.W.R.

11. REMARKS:

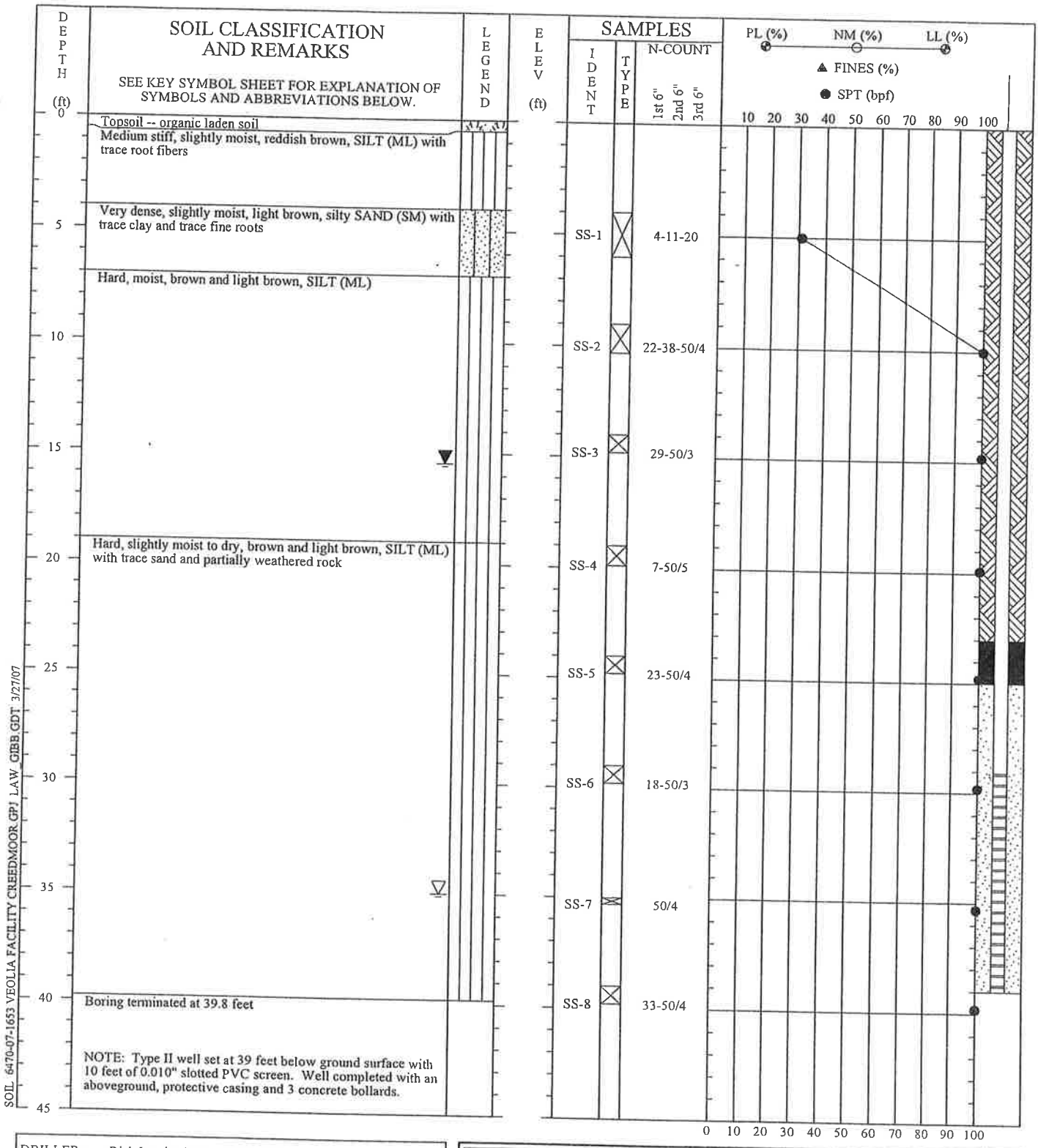
I DO HEREBY CERTIFY THAT THIS WELL WAS CONSTRUCTED IN ACCORDANCE WITH 15A NCAC 2C, WELL CONSTRUCTION STANDARDS, AND THAT A COPY OF THIS RECORD HAS BEEN PROVIDED TO THE WELL OWNER.

Richy Lemire 2/6/07
SIGNATURE OF CERTIFIED WELL CONTRACTOR DATE

Richy Lemire
PRINTED NAME OF PERSON CONSTRUCTING THE WELL

Submit the original to the Division of Water Quality within 30 days. Attn: Information Mgt., 1617 Mail Service Center – Raleigh, NC 27699-1617 Phone No. (919) 733-7015 ext 568.

Form GW-1b
Rev. 7/05



DRILLER: Rich Lemire / SAEDACCO, Inc.
EQUIPMENT: Diedrich D-50 track rig
METHOD: HSA ID 3-3/4"
HOLE DIA.: 7" WELL: Stickup 2.5' Size 2"
REMARKS: Groundwater encountered during drilling activities from 35 to 40 feet.

THIS RECORD IS A REASONABLE INTERPRETATION OF SUBSURFACE CONDITIONS AT THE EXPLORATION LOCATION. SUBSURFACE CONDITIONS AT OTHER LOCATIONS AND AT OTHER TIMES MAY DIFFER. INTERFACES BEWEEN STRATA ARE APPROXIMATE. TRANSITIONS BETWEEN STRATA MAY BE GRADUAL.

Project: Veolia Facility, Creedmoor NC **Boring No:** MW-3
Coord N:
Coord E:
Drilled: February 6, 2007
Project #: 6470-07-1653

MACTEC

ATTACHMENT L3

SOIL IDENTIFICATION LEGEND
GRANVILLE COUNTY, NORTH CAROLINA
May 22, 1987

SYMBOL	MAPPING UNIT	CORRELATION NOTES
544A	Altavista fine sandy loam, 0 to 4 percent slopes	
36B	Appling sandy loam, 2 to 6 percent slopes	1
36C	Appling sandy loam, 6 to 10 percent slopes	1
37	Appling-Urban land complex, 2 to 10 percent slopes	
32B (351B)	Cecil sandy loam, 2 to 6 percent slopes	
32C (351C)	Cecil sandy loam, 6 to 10 percent slopes	
25B	Cecil clay loam, 2 to 6 percent slopes, eroded	
25C	Cecil clay loam, 6 to 10 percent slopes, eroded	
13	Congaree loam, 0 to 2 percent slopes, frequently flooded	
530B (530A)	Creedmoor loamy sand, 2 to 6 percent slopes	2
530C	Creedmoor loamy sand, 6 to 10 percent slopes	
53	Creedmoor-Urban land complex, 2 to 10 percent slopes	
501B	Cullen loam, 2 to 6 percent slopes	3
1C	Cullen loam, 6 to 10 percent slopes	3
506B	Enon fine sandy loam, 2 to 6 percent slopes	
506C	Enon fine sandy loam, 6 to 10 percent slopes	
506D	Enon fine sandy loam, 10 to 15 percent slopes	3
205B	Georgeville silt loam, 2 to 6 percent slopes	
205C	Georgeville silt loam, 6 to 10 percent slopes	
51B	Helena sandy loam, 2 to 6 percent slopes	
212B	Herndon silt loam, 2 to 6 percent slopes	
212C	Herndon silt loam, 6 to 10 percent slopes	
511B	Iredell loam, 2 to 6 percent slopes	
511C	Iredell loam, 6 to 10 percent slopes	
522B	Lignum silt loam, 2 to 6 percent slopes	
306B	Mayodan sandy loam, 2 to 6 percent slopes	
20B	Nason gravelly loam, 2 to 6 percent slopes	3
20C	Nason gravelly loam, 6 to 10 percent slopes	3
20E	Nason gravelly loam, 10 to 25 percent slopes	3
20F	Nason gravelly loam, 25 to 50 percent slopes	3

MBOL	MAPPING UNIT	CORRELATION NOTES
324F	Pacolet sandy loam, 10 25 percent slopes	4
324G	Pacolet and Tatum soils, 25 to 50 percent slopes	3
511A	Picture loam, 0 to 2 percent slopes	5
512	Picture-Iredell-Urban land complex, 0 to 10 percent slopes	5
530D(E)	Pinkston sandy loam, 10 to 20 percent slopes	3
232E	Tatum loam, 10 to 25 percent slopes	4
Ud	Udorthents, loamy	3
57B	Vance sandy loam, 2 to 6 percent slopes	
57C	Vance sandy loam, 6 to 10 percent slopes	3
86(43)	Wehadkee loam, 0 to 2 percent slopes, frequently flooded	6

1 Surface texture changed to reflect dominant field conditions.
2 Map unit 530A combined with 530B due to low acreage.
3 This map unit added to the legend on this review.
4 Slope range changed to more closely reflect the landscape.
5 This is proposed new series, listed as Armenia Variant on previous legend.
6 Slope range added to map unit name. This is a change to all legends at the state soil scientist's direction.

Soil limitation ratings

Soils are commonly rated according to the degree of limitation for such uses as foundations for light structures, recreation, or waste disposal. Limitation ratings are usually based on the hazards, risks, or obstructions presented by the undisturbed soil. Some approaches also consider the difficulty of overcoming limiting soil properties. If the components of a complex or association differ in degree of limitation, they are rated separately; a summary rating for the whole unit may also be given.

A three-class system is commonly used. The rating signifies the degree to which soil properties limit the specified use. The following definitions are commonly used:

Slight limitations present no more than minor problems for the specified use. The soils give satisfactory performance with little or no modification, and any operations or design beyond what is normal for the use are simple and inexpensive. With normal maintenance, performance should be satisfactory for a period considered generally acceptable for the use.

Moderate limitations do not require exceptional risk or cost for the specified use, but the soil has undesirable properties or site features. Moderate limitations require modification of the soil itself, special design, or special maintenance for satisfactory performance over an acceptable period. The needed measures usually increase the cost of establishing or maintaining the use, but the added cost is generally not prohibitive.

Severe limitations require exceptional cost or risk to adapt the soil to the specified use. The soil properties are so unfavorable that special design, a significant increase in construction cost, and possible increased maintenance are required for satisfactory performance over an acceptable period. A limitation that forces removal and replacement of the soil would be rated severe. A rating of severe does not necessarily imply that the soil cannot be adapted to the use, but the cost of overcoming the limitation is high.

Some soils have such extreme limitations that they must be avoided for certain uses if a reasonable alternate site can be found. Such soils have one or more features so unfavorable for the use that the limitation is extremely difficult and expensive to overcome. For example, bedrock at shallow depth or frequent flooding of long duration are extreme limitations for onsite sewage disposal and underground utilities. A rating of very severe is sometimes applied to such extreme cases.

Limitation ratings are given for each kind of soil. For some areas, small-scale maps can be designed to show the geographic distribution of limitation classes for a specific use. Such maps are useful mainly to show the extent of soil problems. Unless the maps identify the kind of limitation (flooding, wetness, depth to rock), they have limited usefulness for planning. Such a map, made for a single use, is generally not valid for other uses.

GRANVILLE COUNTY, NORTH CAROLINA

USDA-SCS
3-80

SOIL INTERPRETATIONS RECORD

5308 CREEDMOOR LOAMY SAND, 2 TO 6 PERCENT SLOPES

THESE ARE MODERATELY WELL OR SOMEWHAT POORLY DRAINED SOILS ON NEARLY LEVEL TO SLOPING UPLANDS OF THE PIEDMONT. IN A REPRESENTATIVE PROFILE, THE SURFACE LAYER IS DARK GRAY SANDY LOAM 2 INCHES THICK. THE SUBSURFACE LAYER IS PALE BROWN SANDY LOAM 6 INCHES THICK. THE SUBSOIL EXTENDS TO 56 INCHES. IT IS PALE BROWN AND BROWNISH YELLOW SANDY CLAY LOAM IN THE UPPER PART; LIGHT YELLOWISH BROWN CLAY IN THE MIDDLE PART AND LIGHT GRAY CLAY AND SILTY CLAY IN THE LOWER PART. THE UNDERLYING LAYER IS FINE SANDY LOAM TO 77 INCHES.

ESTIMATED SOIL PROPERTIES

DEPTH (IN.)	USDA TEXTURE	UNIFIED	AASHTO	FRACT (PCT)	PERCENT OF MATERIAL LESS THAN 3" PASSING SIEVE NO. 4	10	40	200	LIQUID LIMIT	PLASTICITY INDEX
0-8	LS	SM	A-2	0-3	98-100	95-100	50-75	15-35	-	NP
8-12	SCL, CL	CL	A-7	0-3	98-100	95-100	85-95	60-80	40-50	20-30
12-48	C, SIC, SC	CH	A-7	0-3	98-100	95-100	85-97	70-95	51-79	25-49
48-72	SL, SCL, L	ML, CL-ML, SM, SM-SC	A-7, A-6, A-4	0-5	98-100	95-100	85-98	45-90	25-49	4-21

DEPTH (IN.)	CLAY (PCT)	MOIST BULK DENSITY (G/CM3)	PERMEABILITY (IN/HR)	AVAILABLE WATER CAPACITY (IN/IN)	SOIL REACTION (PH)	SALINITY (MMHOS/CM)	SHRINK-SWELL POTENTIAL	EROSION FACTORS K	T	WIND EROD. GROUP	ORGANIC MATTER (PCT)	CORROSIVITY STEEL	CONCRETE
0-8	4-12	1.60-1.75	6.0-20	0.05-0.10	3.6-5.5	-	LOW	.20	3	-	.5-2	HIGH	HIGH
8-12	20-35	1.45-1.65	0.2-0.6	0.13-0.15	3.6-5.5	-	MODERATE	.32					
12-48	35-60	1.30-1.50	§0.06	0.13-0.15	3.6-5.5	-	MODERATE	.32					
48-72	5-27	1.60-1.95	§0.06	0.10-0.14	3.6-5.5	-	LOW	.37					

FLOODING FREQUENCY	FLOODING DURATION	FLOODING MONTHS	HIGH WATER TABLE DEPTH (FT)	HIGH WATER TABLE KIND	HIGH WATER TABLE MONTHS	CEMENTED PAN DEPTH (IN)	CEMENTED PAN HARDNESS	BEDROCK DEPTH (IN)	BEDROCK HARDNESS	SUBSIDENCE INIT. (IN)	SUBSIDENCE TOTAL (IN)	HYDROLOGIC GRP	POTENTIAL FROST ACTION
NONE			1.5-2.0	PERCHED	JAN-MAR	-		>60		-		C	-

SANITARY FACILITIES

SEPTIC TANK ABSORPTION FIELDS	SEVERE-WETNESS,PERCS SLOWLY
SEWAGE LAGOON AREAS	MODERATE-SLOPE
SANITARY LANDFILL (TRENCH)	SEVERE-WETNESS,TOO CLAYEY
SANITARY LANDFILL (AREA)	MODERATE-WETNESS
DAILY COVER FOR LANDFILL	POOR-TOO CLAYEY,HARD TO PACK

CONSTRUCTION MATERIAL

ROADFILL	POOR-LOW STRENGTH
SAND	IMPROBABLE-EXCESS FINES
GRAVEL	IMPROBABLE-EXCESS FINES
TOPSOIL	POOR-THIN LAYER

WATER MANAGEMENT

POND RESERVOIR AREA	SLIGHT
EMBANKMENTS DIKES AND LEVEES	SEVERE-HARD TO PACK
EXCAVATED PONDS AQUIFER FED	SEVERE-NO WATER
DRAINAGE	PERCS SLOWLY,SLOPE
IRRIGATION	WETNESS,FAST INTAKE,PERCS SLOWLY
TERRACES AND DIVERSIONS	WETNESS,PERCS SLOWLY
GRASSED WATERWAYS	PERCS SLOWLY

BUILDING SITE DEVELOPMENT

SHALLOW EXCAVATIONS	SEVERE-WETNESS
DWELLINGS WITHOUT BASEMENTS	MODERATE-WETNESS,SHRINK-SWELL
DWELLINGS WITH BASEMENTS	SEVERE-WETNESS,SHRINK-SWELL
SMALL COMMERCIAL BUILDINGS	MODERATE-WETNESS,SHRINK-SWELL,SLOPE
LOCAL ROADS AND STREETS	SEVERE-LOW STRENGTH
LAWNS, LANDSCAPING AND GOLF FAIRWAYS	MODERATE-WETNESS

5308 GREENMOOR LOAMY SAND, 2 TO 6 PERCENT SLOPES

USDA-SCS
3-80

RECREATIONAL DEVELOPMENT

CAMP AREAS	SEVERE-PERCS SLOWLY	PLAYGROUNDS	SEVERE-PERCS SLOWLY
PICNIC AREAS	SEVERE-PERCS SLOWLY	PATHS. AND TRAILS	MODERATE-WETNESS

CAPABILITY AND YIELDS PER ACRE OF CROPS AND PASTURE (HIGH LEVEL MANAGEMENT)

	CAPA-BILITY.	CORN (BU)		COTTON LINT (LBS)		OATS (BU)		GRAIN SORGHUM (BU)		TOBACCO (LBS)		PASTURE (AUM)			
	IRR	NIRR	IRR.	NIRR	IRR.	NIRR	IRR.	NIRR	IRR.	NIRR	IRR.	NIRR	IRR.	NIRR	IRR.
	2E	75		600		75		65		2200		6.0			

WOODLAND SUITABILITY

	ORDT SYM	MANAGEMENT PROBLEMS EROS HAZARD	EQUIP. LIMIT	SEEDL. MORT'Y	WINDTH HAZARD	PLANT COMPET	POTENTIAL PRODUCTIVITY COMMON TREES	SITE INDX	PROD CLAS	TREES TO PLANT
	8W	SLIGHT	MODER.	SLIGHT			LOBLOLLY PINE	84 *	8	LOBLOLLY PINE
							SHORTLEAF PINE	55	5	SWEETGUM
							SWEETGUM			YELLOW-POPLAR
							WATER OAK			

WINDBREAKS

	SPECIES	HT	SPECIES	HT	SPECIES	HT	SPECIES	HT
	NONE							

WILDLIFE HABITAT SUITABILITY

	POTENTIAL FOR HABITAT ELEMENTS: GRAIN & SEED	GRASS & LEGUME	WILD HERB.	HARDWD TREES	CONIF PLANTS	FERT SHRUBS	WETLAND PLANTS	SHALLOW WATER	POTENTIAL AS HABITAT FOR: OPENLD WILDLF	WOODLD WILDLF	WETLAND WILDLF	RANGELD WILDLF
	GOOD	GOOD	GOOD	GOOD	GOOD	-	POOR	V. POOR	GOOD	GOOD	V. POOR	-

POTENTIAL NATIVE PLANT COMMUNITY (RANGELAND OR FOREST UNDERSTORY VEGETATION)

COMMON PLANT NAME	PLANT SYMBOL (NLSPN)	PERCENTAGE COMPOSITION (DRY WEIGHT)				
SOURWOOD	OXAR					
FLOWERING DOGWOOD	COFL2					
WINGED ELM	ULAL					
EASTERN REDCEDAR	JUVI					
EASTERN HOPHORNBEAM	OSVI					
EASTERN REDBUD	CECA4					
RED MAPLE	ACRU					
SASSAFRAS	SAAL5					
POTENTIAL PRODUCTION (LBS./AC. DRY WT):						
FAVORABLE YEARS						
NORMAL YEARS						
UNFAVORABLE YEARS						

FOOTNOTES

* SITE INDEX IS A SUMMARY OF 5 OR MORE MEASUREMENTS ON THIS SOIL.

GRANVILLE COUNTY, NORTH CAROLINA

USDA-SCS
3-80

SOIL INTERPRETATIONS RECORD

530C CREEDMOOR LOAMY SAND, 6 TO 10 PERCENT SLOPES

THESE ARE MODERATELY WELL OR SOMEWHAT POORLY DRAINED SOILS ON NEARLY LEVEL TO SLOPING UPLANDS OF THE PIEDMONT. IN A REPRESENTATIVE PROFILE, THE SURFACE LAYER IS DARK GRAY SANDY LOAM 2 INCHES THICK. THE SUBSURFACE LAYER IS PALE BROWN SANDY LOAM 6 INCHES THICK. THE SUBSOIL EXTENDS TO 56 INCHES. IT IS PALE BROWN AND BROWNISH YELLOW SANDY CLAY LOAM IN THE UPPER PART; LIGHT YELLOWISH BROWN CLAY IN THE MIDDLE PART AND LIGHT GRAY CLAY AND SILTY CLAY IN THE LOWER PART. THE UNDERLYING LAYER IS FINE SANDY LOAM TO 77 INCHES.

ESTIMATED SOIL PROPERTIES

DEPTH (IN.)	USDA TEXTURE	UNIFIED	AASHTO	FRACT 3 IN (PCT)	PERCENT OF MATERIAL LESS THAN 3" PASSING SIEVE NO. 4	10	40	200	LIQUID LIMIT	PLASTICITY INDEX
0-8	LS	SM	A-2	0-3	98-100	95-100	50-75	15-35	-	NP
8-12	SCL, CL	CL	A-7	0-3	98-100	95-100	85-95	60-80	40-50	20-30
12-48	C, SIC, SC	CH	A-7	0-3	98-100	95-100	85-97	70-95	51-79	25-49
48-72	SL, SCL, L	ML, CL-ML, SM, SM-SC	A-7, A-6, A-4	0-5	98-100	95-100	85-98	45-90	25-49	4-21

DEPTH (IN.)	CLAY (PCT)	MOIST BULK DENSITY (G/CM3)	PERMEABILITY (IN/HR)	AVAILABLE WATER CAPACITY (IN/IN)	SOIL REACTION (PH)	SALINITY (MMHOS/CM)	SHRINK-SWELL POTENTIAL	EROSION FACTORS K	T	WIND EROD. GROUP	ORGANIC MATTER (PCT)	CORROSIVITY STEEL	CONCRETE
0-8	4-12	1.60-1.75	6.0-20	0.05-0.10	3.6-5.5	-	LOW	.20	3	-	.5-2	HIGH	HIGH
8-12	20-35	1.45-1.65	0.2-0.6	0.13-0.15	3.6-5.5	-	MODERATE	.32					
12-48	35-60	1.30-1.50	$0.06	0.13-0.15	3.6-5.5	-	MODERATE	.32					
48-72	5-27	1.60-1.95	$0.06	0.10-0.14	3.6-5.5	-	LOW	.37					

FLOODING FREQUENCY	FLOODING DURATION	FLOODING MONTHS	HIGH WATER TABLE DEPTH (FT)	HIGH WATER TABLE KIND	HIGH WATER TABLE MONTHS	CEMENTED PAN DEPTH (IN)	CEMENTED PAN HARDNESS	BEDROCK DEPTH (IN)	BEDROCK HARDNESS	SUBSIDENCE INIT. (IN)	SUBSIDENCE TOTAL (IN)	HYDI GRP	POTENTIAL FROST ACTION
NONE			1.5-2.0	PERCHED	JAN-MAR	-		>60		-		C	-

SANITARY FACILITIES

SEPTIC TANK ABSORPTION FIELDS	SEVERE-WETNESS,PERCS SLOWLY
SEWAGE LAGOON AREAS	SEVERE-SLOPE
SANITARY LANDFILL (TRENCH)	SEVERE-WETNESS,TOO CLAYEY
SANITARY LANDFILL (AREA)	MODERATE-WETNESS,SLOPE
DAILY COVER FOR LANDFILL	POOR-TOO CLAYEY,HARD TO PACK

CONSTRUCTION MATERIAL

ROADFILL	POOR-LOW STRENGTH
SAND	IMPROBABLE-EXCESS FINES
GRAVEL	IMPROBABLE-EXCESS FINES
TOPSOIL	POOR-THIN LAYER

WATER MANAGEMENT

POND RESERVOIR AREA	SLIGHT
EMBANKMENTS DIKES AND LEVEES	SEVERE-HARD TO PACK
EXCAVATED PONDS AQUIFER FED	SEVERE-NO WATER
DRAINAGE	PERCS SLOWLY,SLOPE
IRRIGATION	WETNESS,FAST INTAKE,PERCS SLOWLY
TERRACES AND DIVERSIONS	SLOPE,WETNESS,PERCS SLOWLY
GRASSED WATERWAYS	SLOPE,PERCS SLOWLY

BUILDING SITE DEVELOPMENT

SHALLOW EXCAVATIONS	SEVERE-WETNESS
DWELLINGS WITHOUT BASEMENTS	MODERATE-WETNESS,SHRINK-SWELL,SLOPE
DWELLINGS WITH BASEMENTS	SEVERE-WETNESS,SHRINK-SWELL
SMALL COMMERCIAL BUILDINGS	SEVERE-SLOPE
LOCAL ROADS AND STREETS	SEVERE-LOW STRENGTH
LAWNS, LANDSCAPING AND GOLF FAIRWAYS	MODERATE-WETNESS,SLOPE

530C CREEDMOOR LOAMY SAND, 6 TO 10 PERCENT SLOPES

USDA-SCS
3-80

RECREATIONAL DEVELOPMENT

CAMP AREAS	SEVERE-PERCS SLOWLY	PLAYGROUNDS	SEVERE-SLOPE,PERCS SLOWLY
PICNIC AREAS	SEVERE-PERCS SLOWLY	PATHS AND TRAILS	MODERATE-WETNESS

CAPABILITY AND YIELDS PER ACRE OF CROPS AND PASTURE (HIGH LEVEL MANAGEMENT)

	CAPA-BILITY	CORN (BU)		COTTON LINT (LBS)		OATS (BU)		GRAIN SORGHUM (BU)		TOBACCO (LBS)		PASTURE (AUM)			
	NIRR	IRR.	NIRR	IRR.	NIRR	IRR.	NIRR	IRR.	NIRR	IRR.	NIRR	IRR.	NIRR	IRR.	NIRR	IRR.
	3E		60		550		65		55		2000		5.8			

WOODLAND SUITABILITY

ORD SYM	MANAGEMENT PROBLEMS: EROS HAZARD	EQUIP. LIMIT	SEEDL. MORT'Y	WIND HAZARD	THI PLANT COMPET	POTENTIAL PRODUCTIVITY: COMMON TREES	SITE INDX	SITE CLAS	TREES TO PLANT
8W	SLIGHT	MODER.	SLIGHT			LOBLOLLY PINE SHORTLEAF PINE SWEETGUM WATER OAK	84 * 55	8 5	LOBLOLLY PINE SWEETGUM YELLOW-POPLAR

WINDBREAKS

SPECIES	HT	SPECIES	HT	SPECIES	HT	SPECIES	HT
NONE							

WILDLIFE HABITAT SUITABILITY

POTENTIAL FOR HABITAT ELEMENTS: GRAIN & SEED	GRASS & LEGUME	WILD HERB.	HARDWD TREES	CONIF PLANTS	FERT SHRUBS	WETLAND PLANTS	SHALLOW WATER	POTENTIAL AS HABITAT FOR: OPENLD WILDLF	WOODLD WILDLF	WETLAND WILDLF	RANGELD WILDLF
FAIR	GOOD	GOOD	GOOD	GOOD	-	V. POOR	V. POOR	GOOD	GOOD	V. POOR	-

POTENTIAL NATIVE PLANT COMMUNITY (RANGELAND OR FOREST UNDERSTORY VEGETATION)

COMMON PLANT NAME	PLANT SYMBOL (NLSPM) *	PERCENTAGE COMPOSITION (DRY WEIGHT)
SOURWOOD	OXAR	
FLOWERING DOGWOOD	COFL2	
WINGED ELM	ULAL	
EASTERN REDCEDAR	JUVI	
EASTERN HOPHORNBEAM	OSVI	
EASTERN REDBUD	CECA4	
RED MAPLE	ACRU	
SASSAFRAS	SAAL5	
POTENTIAL PRODUCTION (LBS./AC. DRY WT):		
FAVORABLE YEARS		
NORMAL YEARS		
UNFAVORABLE YEARS		

FOOTNOTES

* SITE INDEX IS A SUMMARY OF 5 OR MORE MEASUREMENTS ON THIS SOIL.

CREEDMOOR SERIES

The Creedmoor series consists of moderately well drained and somewhat poorly drained, very slowly permeable soils that formed in residuum weathered from Triassic material. The soils are on gently sloping to sloping ridges within the Triasssic Basin. Slopes range from 2 to 15 percent slopes.

Creedmoor soils are geographically associated with Altavista, Picture, Congaree, Enon, Iredell, and Mayodan soils. The moderately well drained, rarely flooded Altavista soils are on low stream terraces. The well drained and moderately well drained, frequently flooded Congaree soils are in floodplains on natural stream levees. Picture, Enon, and Iredell soils formed over basic crystalline rock. Picture soils are poorly drained, have montmorillinitic mineralogy, and are in broad upland flats. Enon soils are well drained. Iredell soils have high to very high shrink-swell potential in the subsoil. The well drained Mayodan soils are on slightly higher, slightly convex to convex ridges and knolls.

Typical pedon of Creedmoor loamy sand, 2 to 6 percent slopes, is 2.0 miles southwest of Creedmoor on United States Highway 15, 0.8 mile north on Secondary Road 1109, 30 feet west of SR1109, in field:

Ap--0 to 8 inches; brown (10YR 5/3) loamy sand; weak fine granular structure; very friable; medium acid; clear smooth boundary.

BE--8 to 12 inches; yellow (10YR 7/6) sandy clay loam; weak medium granular structure; friable; strongly acid; gradual wavy boundary.

B/E--12 to 16 inches; brownish yellow (10YR 6/6) clay; yellow (10YR 7/6) sandy clay loam in cracks; weak medium subangular blocky structure; firm, slightly sticky, slightly plastic; very strongly acid; abrupt smooth boundary.

Bt1--16 to 33 inches; multicolored yellow (10YR 7/6), pale brown (10YR 6/3), light brownish gray (10YR 6/2), and red (2.5YR 5/6) clay; moderate medium subangular blocky structure; firm, slightly sticky, plastic; extremely acid; gradual wavy boundary.

Bt2--33 to 39 inches; light gray (10YR 7/1) clay; common fine distinct red (2.5YR 5/8) and few fine distinct strong brown (7.5YR 5/8) mottles; moderate medium subangular blocky structure; very firm, sticky, plastic; extremely acid; gradual wavy boundary.

Bt3--39 to 48 inches; light gray (10YR 7/1) clay; common fine distinct strong brown (7.5YR 5/8) and few fine

prominant red (2.5YR 5/6) mottles; common white flakes; weak medium subangular blocky structure; very firm, sticky, plastic; extremely acid; gradual wavy boundary.

BC--48 to 60 inches; light gray (10YR 7/1) clay loam; few fine distinct strong brown (7.5YR 5/8 and 7.5YR 4/6) mottles; weak medium subangular blocky structure; friable to firm, slightly sticky, slightly plastic; extremely acid; gradual wavy boundary.

C--60 to 72 inches; multicolored light gray (10YR 7/1), strong brown (7.5YR 5/8 and 7.5YR 4/6), and reddish brown (5YR 5/4) saprolite that is clay loam; common fine white flakes; massive; friable, slightly sticky; extremely acid.

Thickness of the clayey Bt horizon ranges from 15 to 50 inches. Reaction is extremely acid to strongly acid throughout except for surface layers that have been limed.

The A or Ap horizon has hue of 7.5YR to 2.5Y, value of 3 to 6, and chroma of 1 to 6. A horizons with values less than 4 are less than 10 inches thick. The E horizon, where present, has hue of 7.5YR to 2.5Y, vale of 5 to 7, and chroma of 2 to 4. Texture is similar to the A horizon.

The Bt horizon has hue of 7.5YR to 2.5Y, value of 5 to 7, and chroma of 2 to 8. Some layers are mottled or contain mottles in shades of red, yellow, brown, and gray ranging from few to many. It is sandy clay loam, silty clay loam, clay loam, sandy clay, clay, or silty clay. The upper part of the Bt horizon is distinctly coarser in texture and is less firm in consistence than the lower Bt horizon.

The C horizon has hue of 10R to 2.5Y, value of 3 to 8, and chroma of 1 to 8, or is varigated, multicolored, weathered Triassic saprolite from sandstone, siltstone, or mudstone that is loam, sandy loam, clay loam, or sandy clay loam.

The Cr horizon, where present, is highly fractured, moderately hard Triassic bedrock that can be dug with difficulty with handtools.

1/30/87

5308=Creedmoor loamy sand, 2 to 6 percent slopes. This soil is deep, gently sloping, and moderately well drained and somewhat poorly drained. It is on simple, slightly convex slopes on broad ridges. The areas are irregular in shape and range from 15 to 300 acres.

The typical sequence, depth, color, and texture of the layers of the soil are:

Surface layer:

0 to 8 inches; brown loamy sand

Subsoil:

8 to 12 inches; yellow sandy clay loam
12 to 16 inches; brownish yellow clay
16 to 33 inches; mottled yellow, pale brown, light grayish brown, and red clay
33 to 48 inches; light gray mottled clay
48 to 60 inches; light gray mottled clay loam

Underlying material:
60 to 68 inches; multicolored saprolite that crushes to clay loam.

Some areas have 5 to 15 percent gravel on the surface, a sandy loam surface layer, or a surface layer that is greater than 20 inches thick.

Important soil properties:

Reaction: extremely acid to strongly acid throughout except where lime has been added

Permeability: moderately rapid in the surface; very slow throughout the subsoil (can vary from site to site)

Available water capacity: moderate but may be droughty in the surface

Potential rooting depth: greater than 60 inches

Surface runoff: medium

Hazard of erosion: moderate

Depth to perched water table: from January to March - 18 to 24 inches

Shrink-swell potential in the subsoil: moderate

Soil strength: low

Included in this soil in mapping are a few small areas of Altavista, Iredell, and Mayodan soils. The Altavista soils are moderately well drained and on low stream terraces immediately adjacent to the uplands and lower floodplains. The Iredell soils are moderately well drained to somewhat poorly drained, have a high to very high shrink-swell potential in the subsoil, and are on nearly level to gently sloping concave broad ridges and small depressions. The Mayodan soils are well drained and on slightly higher knolls. Also, a few areas of unnamed soils that are well drained, have less than 35 percent clay in the subsoil, and have moderate permeability are included. In addition, similar unnamed soils that have a high to very high shrink-swell potential and Creedmoor soils that have slopes of more than 6 percent or less than 2 percent near the edge of some delineations of this Creedmoor soil are included. The included soils make up about 15 percent of the map unit.

Major uses

Major current uses: irrigated and non-irrigated cropland, woodland, and hayland and pasture, with an increasing use of this soil for homesites and industry

This Creedmoor soil is well suited to cultivated crops. Tobacco, corn, soybeans, and small grains are the main crops, but others including strawberries and vegetables are also grown locally. Use of this soil as cropland is limited mainly by the hazard of erosion, low fertility and acidity, low available water in the surface, and the perched water table. The soil surface is friable and easy to keep in good tilth. It can be worked over a wide range of moisture content, but excessive cultivation of the sandy surface layer can result in the formation of a tillage pan. Pan formation can be reduced by the use of minimum tillage. Subsoiling may be required to break up existing pans. The sandy surface may be droughty. To overcome drought stress during extended dry periods, irrigate frequently and briefly for optimum yields. Regulate irrigation to control runoff, erosion, and loss of nutrients from the surface. Spring tillage and fall harvest may be delayed because of wetness resulting from the perched water table. Reduce the risk of erosion by using conservation management systems that include terraces, diversions, grassed waterways, minimum tillage, stripcropping, tilling on the contour or across the slope, and growing green manure or winter cover crops. Limiting tillage for seedbed preparation and weed control also reduces runoff and erosion. Crop residue left on or

near the surface reduces runoff and helps maintain soil tilth and organic matter content. Crops respond well to lime and fertilizer in applications designed to overcome the low fertility and acidity. Soil tests should be performed to determine fertilizer and liming needs.

This Creedmoor soil is well suited to pasture and hayland. The choice of plants for this soil is limited to forage species that form dense, fiberous root systems or those capable of penetrating dense clay materials. Fescue and orchardgrass are adapted forage plants for spring and fall production and coastal bermudagrass are adapted forage plants for summer production.

A good stand of desirable plants should be maintained for forage production and erosion control. Maintain thee quality and quantity of forage by rotating grazing, mowing and clipping, discouraging selective grazing, controlling weeds, and by applying fertilizer and lime according to a soil test. Promote uniform grazing by cross-fencing and properly locating watering facilities, salt licks, and supplemental feed. Reduce the risk of erosion by avoiding overgrazing and by maintaining plant cover. Pasture renovation is needed if the better forage plants have decreased to levels less than needed for optimum production. The hazard of erosion is moderate until the sod is established or if the sod is broken. Seedbed preparation should be on the contour or across the slope where practical. After seeding, deferred grazing is essential until young plants are well established. Grazing of forages and livestock traffic during periods of high moisture tends to puddle and compact the surface.

This Creedmoor soil is well suited to use as woodland. Common trees are loblolly pine, shortleaf pine, sweetgum, and water oak. The main understory plants are American holly, flowering dogwood, red maple, and sassafras. The mean site index (50-year site curve) for loblolly pine is 80. The production at th culmination of mean annual increment (CMAI) is 110 cubic feet, per acre, at 50 years of age for trees 3 inches and larger in diameter at breast height. This soil has few limitations for management of timber; however, proper road location and design of road drainage systems will increase the life of the logging road. The hazard of erosion from roads and landings can be lessened by constructing diversions or waterbars and by seeding cuts and fills. Spoil and sidecast from excavations and roadbuilding are subject to rill and gully erosion and to sloughing. They are also a potential source of stream sedimentation. Site preparation, such as chopping, burning, and herbicide application reduces immediate plant competition and improves seedling survival. If site

preparation is not adequate after harvest or if the site is in heavy sod, competition from undesirable plants will prevent or prolong natural reforestation of desirable trees. Natural reforestation of harvested areas by seedlings is not as effective as hand planting of loblolly seedlings. Once seedings are established, unwanted trees can be controlled by burning, herbicide application, girdling, or cutting.

This Creedmoor soil is moderately suited to most urban development. The main limitations are wetness caused by the perched water table, slow permeability, moderate shrink-swell, and low soil strength.

This soil is moderately suited to septic tank absorption fields because of wetness, slow permeability, and moderate shrink-swell. These limitations should be considered in the design of septic tank absorption fields. Increasing the size of the absorption field can help compensate for the restricted permeability. Dig the trenches at proper moisture levels because absorption field trench walls smear and seal if constructed when the soil is too moist. The small areas of unnamed soils that have moderate permeability and Mayodan soils are more suitable for placement of septic tank absorption fields.

This soil is moderately suited to dwellings with or without basements. The quality of foundations can be adversely affected by wetness and the moderate shrink-swell. Where homes and buildings are to be constructed, the site should be graded to direct surface runoff away from the structure. During construction, soil disturbance should be kept to a minimum to reduce the risk of erosion. The risk of erosion and the cost of maintenance can be reduced by stabilizing or revegetating areas that have been disturbd. Stockpile topsoil and use it to reclaim disturbed areas. Use temporary sediment or debris basins to reduce the loss of soil material from construction sites. The risk of corrosion to uncoated steel and concrete can be offset by using corrosion-resistant material, particularly cement.

This soil is poorly suited to local roads and streets. The quality of roadbeds and road surfaces can be adversely affected by the moderate shrink-swell and the low soil strength when the soil is wet. Design roads to control surface runoff and the limited ability to support a load. All cutbanks should be stabilized.

This Creedmoor soil is in land capability subclass IIe, in fertility classification SCgh, and in woodland group 8A.

2/6/87

530C=Creedmoor loamy sand, 6 to 10 percent slopes. This soil is deep, sloping, and moderately well drained and somewhat poorly drained. It is on simple, convex broad ridges. The areas are irregular in shape and range from 15 to 150 acres.

The typical sequence, depth, color, and texture of the layers of the soil are:

Surface layer:

0 to 8 inches; brown loamy sand

Subsoil:

8 to 12 inches; yellow sandy clay loam
12 to 16 inches; brownish yellow clay
16 to 33 inches; mottled yellow, pale brown, light grayish brown, and red clay
33 to 48 inches; light gray mottled clay
48 to 60 inches; light gray mottled clay loam

Underlying material:
60 to 68 inches; multicolored saprolite that crushes to clay loam.

Some areas have 5 to 15 percent gravel on the surface, a sandy loam surface layer, or a surface layer that is greater than 20 inches thick.

Important soil properties:

Reaction: extremely acid to strongly acid throughout except where lime has been added

Permeability: moderately rapid in the surface; very slow throughout the subsoil (can vary from site to site)

Available water capacity: moderate but may be droughty in the surface

Potential rooting depth: greater than 60 inches

Surface runoff: severe

Hazard of erosion: severe

Depth to perched water table: from January to March - 18 to 24 inches

Shrink-swell potential in the subsoil: moderate

Soil strength: low

Included in this soil in mapping are a few small areas of Altavista and Mayodan soils. The Altavista soils are moderately well drained and on low stream terraces immediately adjacent to the uplands and lower floodplains. The Mayodan soils are well drained and on more convex shoulders of side slopes. Also, a few areas of unnamed soils that are well drained, have less than 35 percent clay in the subsoil, and have moderate permeability are included. In addition, similar unnamed soils that have a high to very high shrink-swell potential and Creedmoor soils that have slopes of less than 6 percent or more than 10 percent near the edge of some delineations of this Creedmoor soil are included. The included soils make up about 15 percent of the map unit.

Major uses

Major current uses: irrigated and non-irrigated cropland, woodland, and hayland and pasture, with an increasing use of this soil for homesites and industry

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fertilizer in applications designed to overcome the low fertility and acidity. Soil tests should be performed to determine fertilizer and liming needs.

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This Creedmoor soil is well suited to use as woodland. Common trees are loblolly pine, shortleaf pine, sweetgum, and water oak. The main understory plants are American holly, flowering dogwood, red maple, and sassafras. The mean site index (50-year site curve) for loblolly pine is 80. The production at th culmination of mean annual increment (CMAI) is 110 cubic feet, per acre, at 50 years of age for trees 3 inches and larger in diameter at breast height. This soil has few limitations for management of timber; however, proper road location and design of road drainage systems will increase the life of the logging road. The hazard of erosion from roads and landings can be lessened by constructing diversions or waterbars and by seeding cuts and fills. Spoil and sidecast from excavations and roadbuilding are subject to rill and gully erosion and to sloughing. They are also a potential source of stream sedimentation. Site preparation, such as chopping, burning, and herbicide application reduces immediate plant competition and improves seedling survival. If site preparation is not adequate after harvest or if the site is in heavy sod, competition from undesirable plants will

prevent or prolong natural reforestation of desirable trees. Natural reforestation of harvested areas by seedlings is not as effective as hand planting of loblolly seedlings. Once seedings are established, unwanted trees can be controlled by burning, herbicide application, girdling, or cutting.

This Creedmoor soil is moderately suited to most urban development. The main limitations are wetness caused by the perched water table, slow permeability, moderate shrink-swell, low soil strength, and slope in some areas.

This soil is moderately suited to septic tank absorption fields because of wetness, slow permeability, moderate shrink-swell, and slope in some areas. These limitations should be considered in the design of septic tank absorption fields. Increasing the size of the absorption field can help compensate for the restricted permeability. Dig the trenches at proper moisture levels because absorption field trench walls smear and seal if constructed when the soil is too moist. The small areas of unnamed soils that have moderate permeability and Mayodan soils are more suitable for placement of septic tank absorption fields.

This soil is moderately suited to dwellings with or without basements. The quality of foundations can be adversely affected by wetness and the moderate shrink-swell. Where homes and buildings are to be constructed, the site should be graded to direct surface runoff away from the structure. During construction, soil disturbance should be kept to a minimum to reduce the risk of erosion. The risk of erosion and the cost of maintenance can be reduced by stabilizing or revegetating areas that have been disturbd. Stockpile topsoil and use it to reclaim disturbed areas. Use temporary sediment or debris basins to reduce the loss of soil material from construction sites. The risk of corrosion to uncoated steel and concrete can be offset by using corrosion-resistant material, particularly cement.

This soil is poorly suited to local roads and streets. The quality of roadbeds and road surfaces can be adversely affected by the slope in some areas, the moderate shrink-swell and the low soil strength when the soil is wet. Design roads to control surface runoff and the limited ability to support a load. Place roads in the less sloping parts of the delineations. All cutbanks should be stabilized.

This Creedmoor soil is in land capability subclass IIIe, in fertility classification SCgh, and in woodland group 8A.

U. S. DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE
COOPERATING WITH
STATE AGRICULTURAL EXPERIMENT STATION

APPROX. SCALE 1" = 1320'

USDA-SCS FORT WORTH, TEXAS

SOIL SURVEY FIELD SHEET
GRANVILLE COUNTY, NORTH CAROLINA
ADVANCE COPY - SUBJECT TO CHANGE

SURVEY HAS NOT BEEN COMPILED NOR CORRELATED. NAMES MAY BE CHANGED AND AREAS MAY BE COMBINED.

ATTACHMENT L4

S&ME
(A partnership in North Carolina)

April 22, 1988

Envirotek, Inc.,
1111 Oberlyn Road
Raleigh, North Carolina 27605

Attention: Mr. Bob Hume

Reference: Geotechnical Investigation Report
Proposed AETC Office Building
N.C. State Routes 1106 and 1104
Butner, North Carolina
S & ME Job No. 1051-88-232

Gentlemen:

S & ME has completed the authorized subsurface exploration and geotechnical engineering evaluation of foundation conditions for the proposed AETC Office Building near Butner, North Carolina. This report presents a brief description of the projected project site, findings of the investigation, and recommendations for site preparation and foundation support.

PROJECT AND SITE DESCRIPTION

The proposed office building is to be located on a corner lot in the southwest quadrant of the intersection of State Routes 1106 and 1104 near Butner, North Carolina. The project consists of construction of an office warehouse type structure with a plan area of approximately 15,000 square feet with a 140 foot long loading dock projecting from the rear of the structure. The building will be a one-story structure and building loads are anticipated to be relatively light with maximum wall and column loads anticipated on the order of 1 to 3 kips per linear foot and 100 to 125 kips, respectively.

Topographically, the site slopes gently downward toward the south and

S&ME, Inc.
3109 Spring Forest Rd., P.O. Box 58069
Raleigh, NC 27658-8069 (919) 872-2660

west from State Route 1106 toward the building area. Existing grades in the higher portions of the property at the intersection of State Routes 1106 and 1104 range between approximately 368 to 370 feet with existing grades within the building area ranging from between 350 to 360 feet. The front portion of the property north of the office building is an open field and due to the gentle slope toward the building from the higher areas of the site, the surface conditions along the front northern portion of the building are relatively wet and some standing water was present in this area at the time of the investigation. During drilling operations, rutting of the near surface soils occurred as the drill rig traveled across this area. Just south of the front portion of the building (south of Borings B-1 and B-2), the site is wooded and the surface conditions are significantly more stable in this portion of the site with the exception of some soft conditions noted in the swale running along the southern portion of the loading dock area.

Grading for the site will require cut and fill depths on the order of 2 to 4 feet or less with the majority of the cut occurring in the loading dock area and in the southeastern corner of the property where access for the lower level parking around the loading dock will require cuts up to 5 to 7 feet. Access to the site will be provided by drives connecting to State Route 1104 to the east and from State Route 1106 along the northern portion of the site.

SUBSURFACE INVESTIGATION

Subsurface conditions were investigated by 4 soil test borings in the building area and 2 soil test borings in roadway and parking areas as indicated in Figure 1 of the report. Soil test boring locations were established in the field by estimating right angles and taping distances from existing site boundaries and should be considered approximate. Ground surface elevations at boring locations were estimated from available topographic information and should also be considered approximate. Soil test borings were advanced utilizing hollow stem

augering techniques and soil samples were obtained at selected intervals in accordance with standard penetration test procedures to evaluate the general engineering characteristics of the subsurface soils. In addition, a bulk bag sample representive of near surface materials from cut areas of the site was obtained for standard Proctor compaction and California Bearing Ratio testing.

A generalized subsurface profile prepared from soil test boring data is presented as Figure 2 of this report to graphically illustrate subsurface conditions encountered at the site. More detailed descriptions of subsurface conditions at the individual boring locations are presented in the Test Boring Records attached to this report.

Near surface soils across the site to depths of typically 2 to 4 feet are damp to very wet especially along the front portion of the site just north of the wood line where the near surface soils were saturated. Near surface soils at Borings B-1 and B-2 consist of soft wet sandy clay materials to depths of approximately 3.5 to 4.5 feet. Due to surface runoff being directed toward and ponding in this section of the site, the surface soils have softened as reflected by a standard penetration resistance value of 3 blows per foot (bpf) above the 3.5 foot level at these two boring locations. The upper 2 to 3 feet of soils at the remaining boring locations (B-3 through B-6) consist of silty or sandy clay materials; however, these materials were not as wet as those at boring B-1 and B-2 and these materials are significantly stiffer as indicated by standard penetration resistance values of 6 to 13 (bpf).

Below depths of approximately 2 to 4 feet, soil test borings indicate the presence of stiff to very stiff sandy clays, very firm to dense silty fine sands and fine sandy silts to depths of 6 to 12 feet. Soils below depths of 3 to 6 feet exhibit standard penetration resistance values of 15 to over 30 bpf and are significantly more stiff or dense than within the upper 2 to 4 foot.

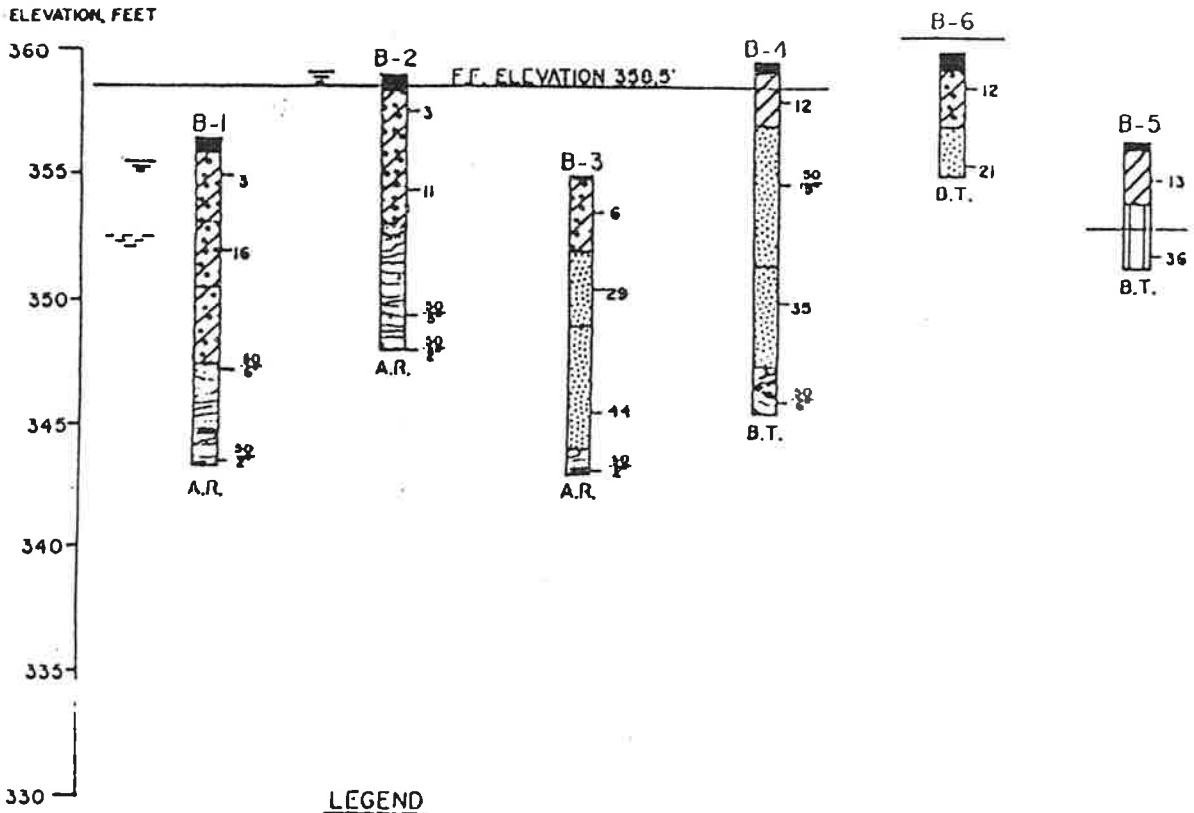
Soil test borings within the building area indicate the presence of partially weathered rock at depths of 6 to 12 feet beneath the ground surface. Partially weathered rock is defined as rock like materials which exhibit standard penetration resistance values in excess of 100 bpf that can be penetrated by soil drilling methods. These borings however reached auger refusal to drilling after penetrating only a few feet into partially weathered rock at depths of 11 to 14 feet below existing grades.

Ground water levels were measured upon completion of drilling and after 24 hours following completion of drilling to allow the water levels to stabilize. No ground water was encountered within the depth of drilling at Borings B-3 through B-6; however, stabilized water levels were measured within one foot of the ground surface at Borings B-1 and B-2 along the front portion of the building area at the interface of the woods and nearby field. High ground water levels at Borings B-1 and B-2 are considered to be perched ground water as a result of infilltration of surface water being trapped above the underlying harder materials. As a result of the shallow ground water encountered along the front portion of the site, and due to the softness of the soils in this area, there will be a need to install perimeter ditches prior to construction through this area to lower ground water levels and intercept down gradient seepage. In addition, some undercutting of these materials will likely be required along the front portion of the building since these materials are soft and cannot be densified in their saturated condition.

RECOMMENDATIONS

The following recommendations made based upon a review of the proposed construction, an evaluation of subsurface conditions as represented by soil test boring data in this report, and past experience on projects with

GENERALIZED SUBSURFACE PROFILE



LEGEND

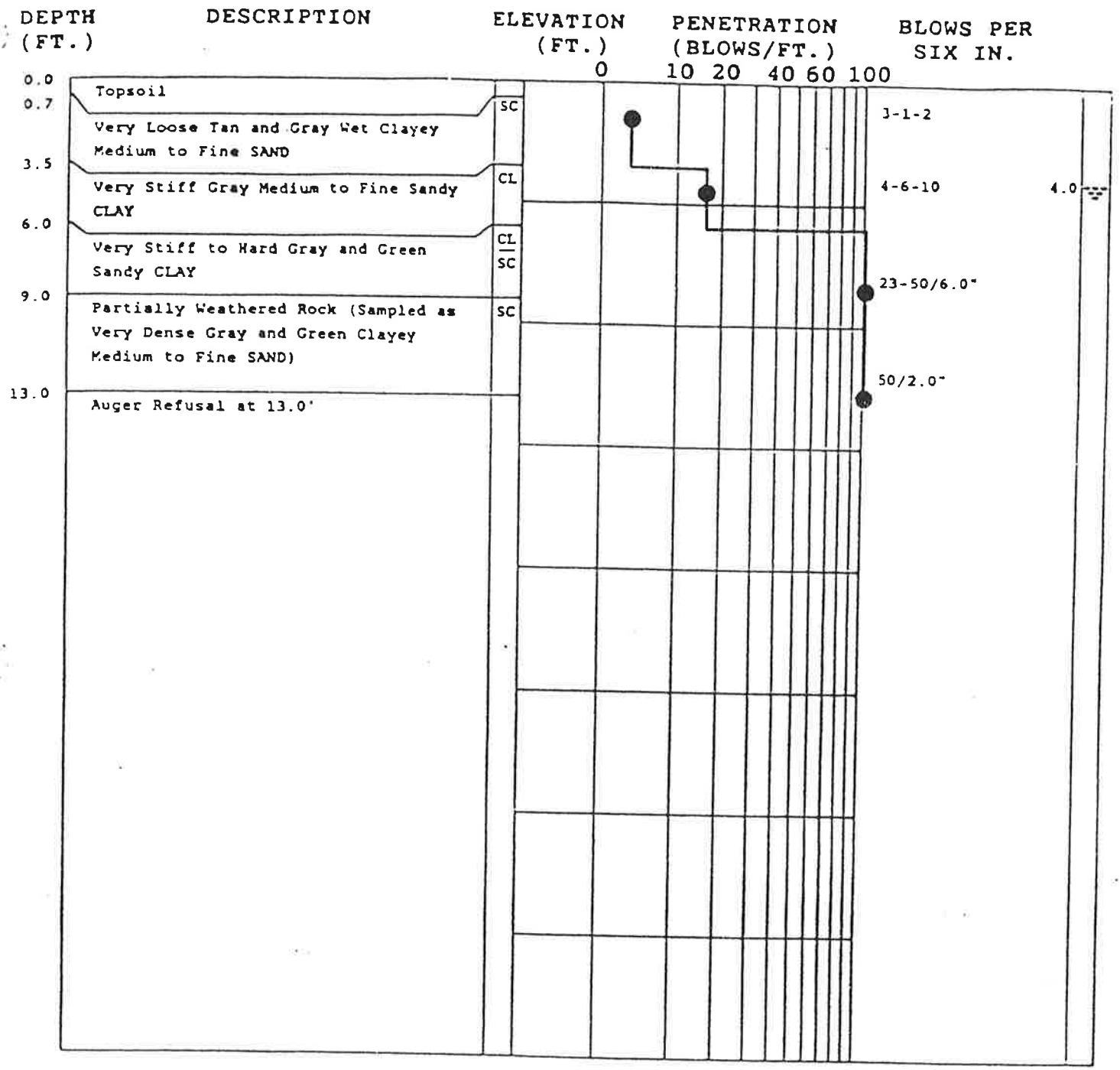
- TOPSOIL
- SANDY CLAY (CL) OR CLAYEY SAND (SC)
- SILTY MEDIUM TO FINE SAND (SM)
- SILTY CLAY (CL) OR (CH)
- FINE SANDY SILT (ML)
- PARTIALLY WEATHERED ROCK

S&ME

AETC CORPORATION
BUTNER, NORTH CAROLINA

DRWN. BY: J.H.A.	CHKD. BY: R.F.S.
JOB NO: 1021 00 232	DATE: 4-25-00
SCALE: AS SHOWN	FIGURE 2

TEST BORING RECORD



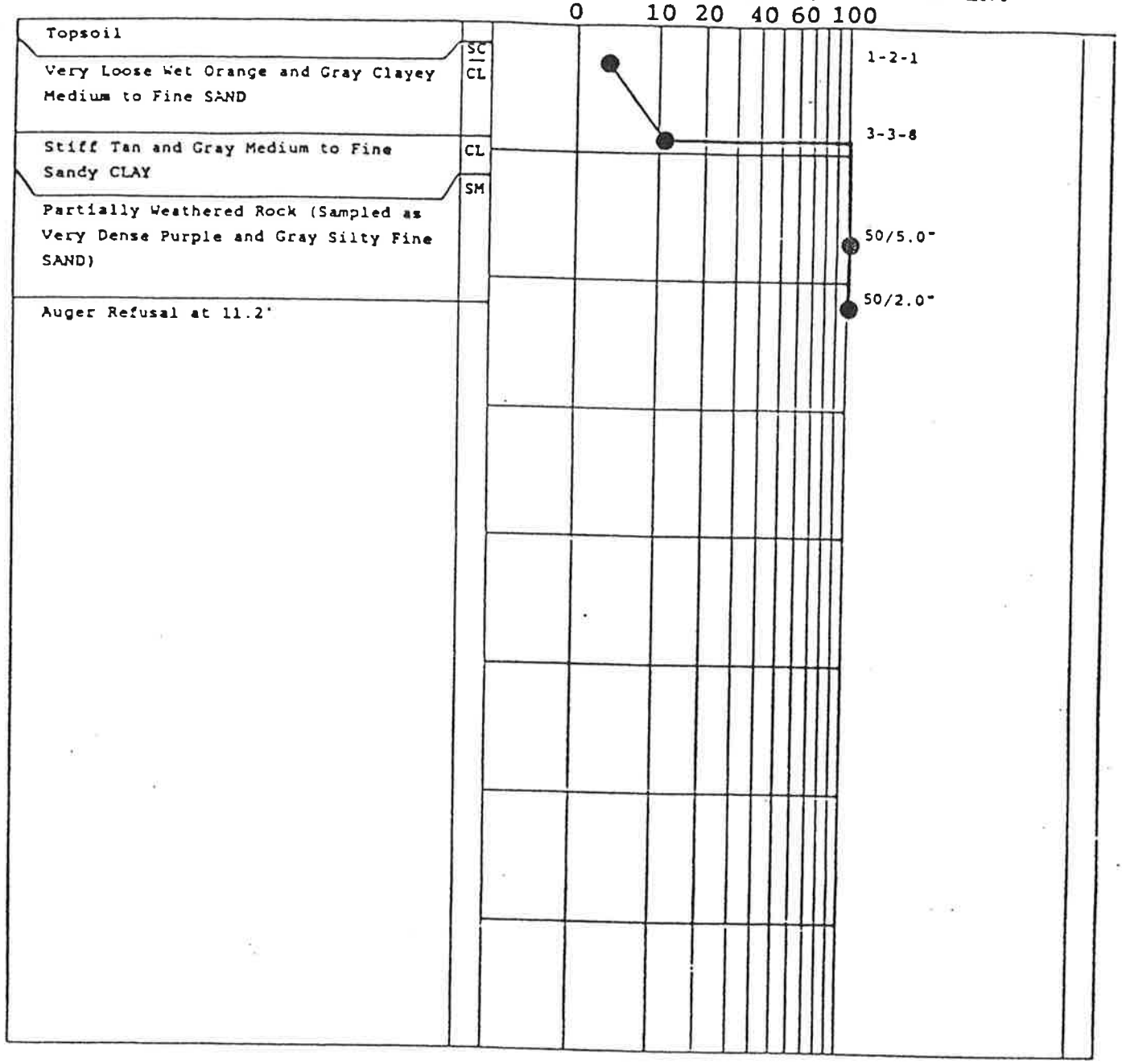
REFER TO ATTACHED SHEET FOR EXPLANATIONS AND SYMBOLS

JOB NUMBER 051-88-232
BORING NUMBER B-1
DATE 04-13-88

S&ME

TEST BORING RECORD

DEPTH (FT.)	DESCRIPTION	ELEVATION (FT.)	PENETRATION (BLOWS/FT.) 0 10 20 40 60 100	BLOWS PER SIX IN.
0.0	Topsoil			
0.8	Very Loose Wet Orange and Gray Clayey Medium to Fine SAND	SC/CL		1-2-1
4.5	Stiff Tan and Gray Medium to Fine Sandy CLAY	CL		3-3-6
6.0	Partially Weathered Rock (Sampled as Very Dense Purple and Gray Silty Fine SAND)	SM		50/5.0"
11.2	Auger Refusal at 11.2'			50/2.0"



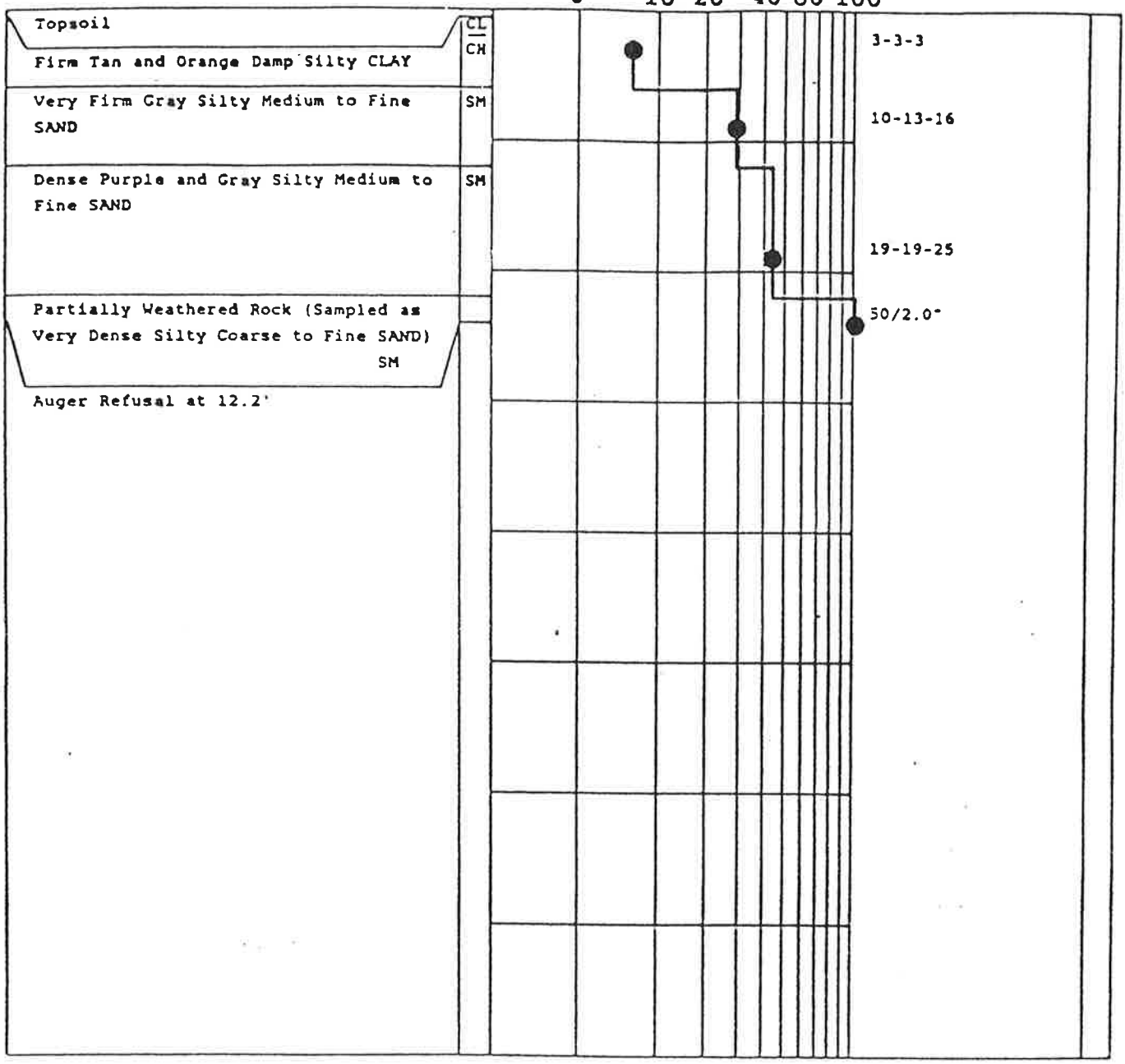
REFER TO ATTACHED SHEET FOR EXPLANATIONS AND SYMBOLS

JOB NUMBER 051-88-232
BORING NUMBER B-2
DATE 04-12-88

S&ME

TEST BORING RECORD

DEPTH (FT.)	DESCRIPTION	ELEVATION (FT.)	PENETRATION (BLOWS/FT.) 0 10 20 40 60 100	BLOWS PER SIX IN.
0.0	Topsoil	CL/CH		
0.3	Firm Tan and Orange Damp Silty CLAY			3-3-3
3.0	Very Firm Gray Silty Medium to Fine SAND	SM		10-13-16
6.0	Dense Purple and Gray Silty Medium to Fine SAND	SM		19-19-25
11.0	Partially Weathered Rock (Sampled as Very Dense Silty Coarse to Fine SAND)	SM		50/2.0"
12.2	Auger Refusal at 12.2'			



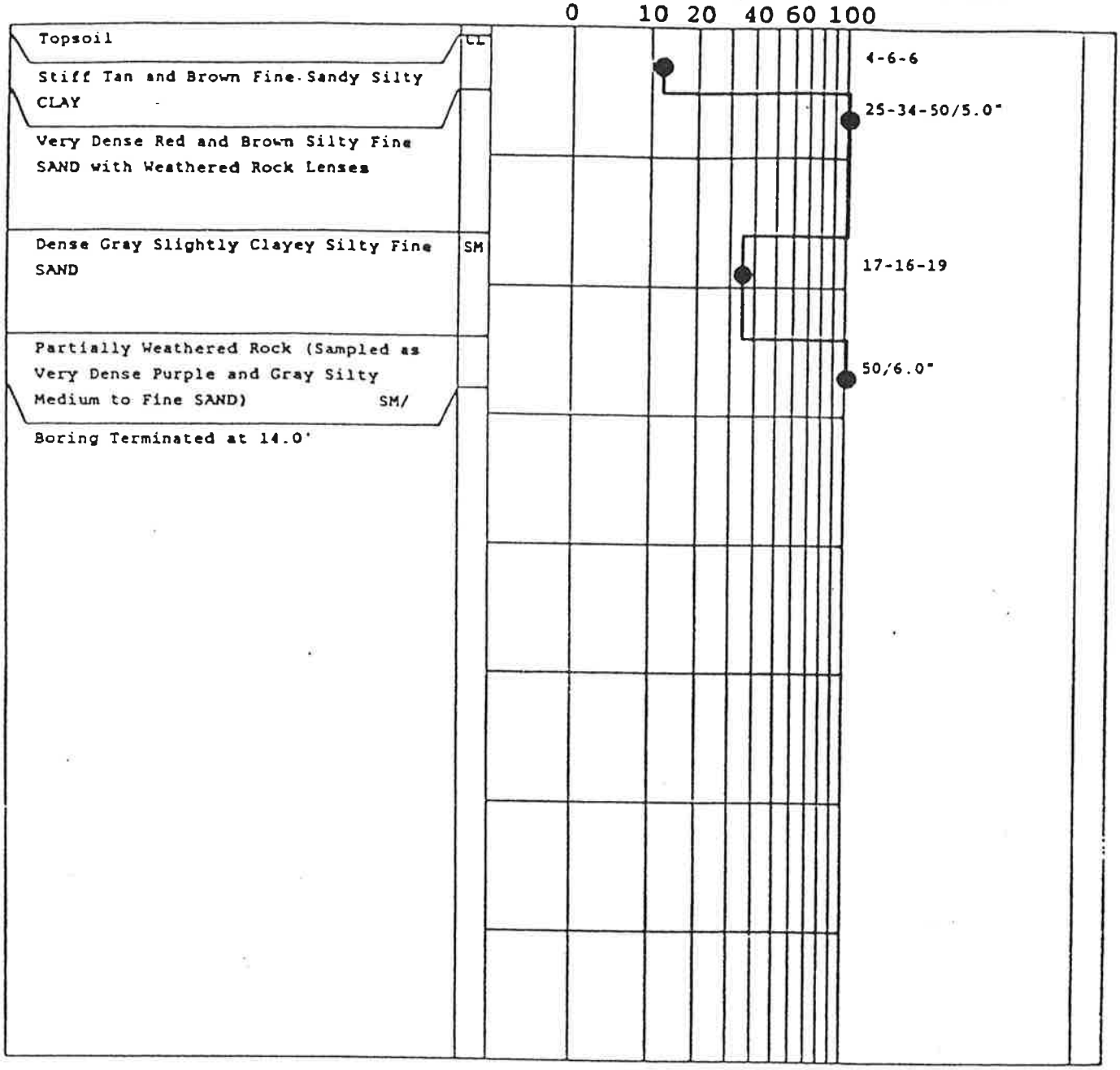
REFER TO ATTACHED SHEET FOR EXPLANATIONS AND SYMBOLS

JOB NUMBER 051-88-232
BORING NUMBER B-3
DATE 04-13-88

S&ME

TEST BORING RECORD

DEPTH (FT.)	DESCRIPTION	ELEVATION (FT.)	PENETRATION (BLOWS/FT.) 0 10 20 40 60 100	BLOWS PER SIX IN.
0.0	Topsoil			
0.4	Stiff Tan and Brown Fine Sandy Silty CLAY			4-6-6
2.5	Very Dense Red and Brown Silty Fine SAND with Weathered Rock Lenses			25-34-50/5.0"
8.0	Dense Gray Slightly Clayey Silty Fine SAND	SM		17-16-19
12.0	Partially Weathered Rock (Sampled as Very Dense Purple and Gray Silty Medium to Fine SAND)	SM/		50/6.0"
14.0	Boring Terminated at 14.0'			

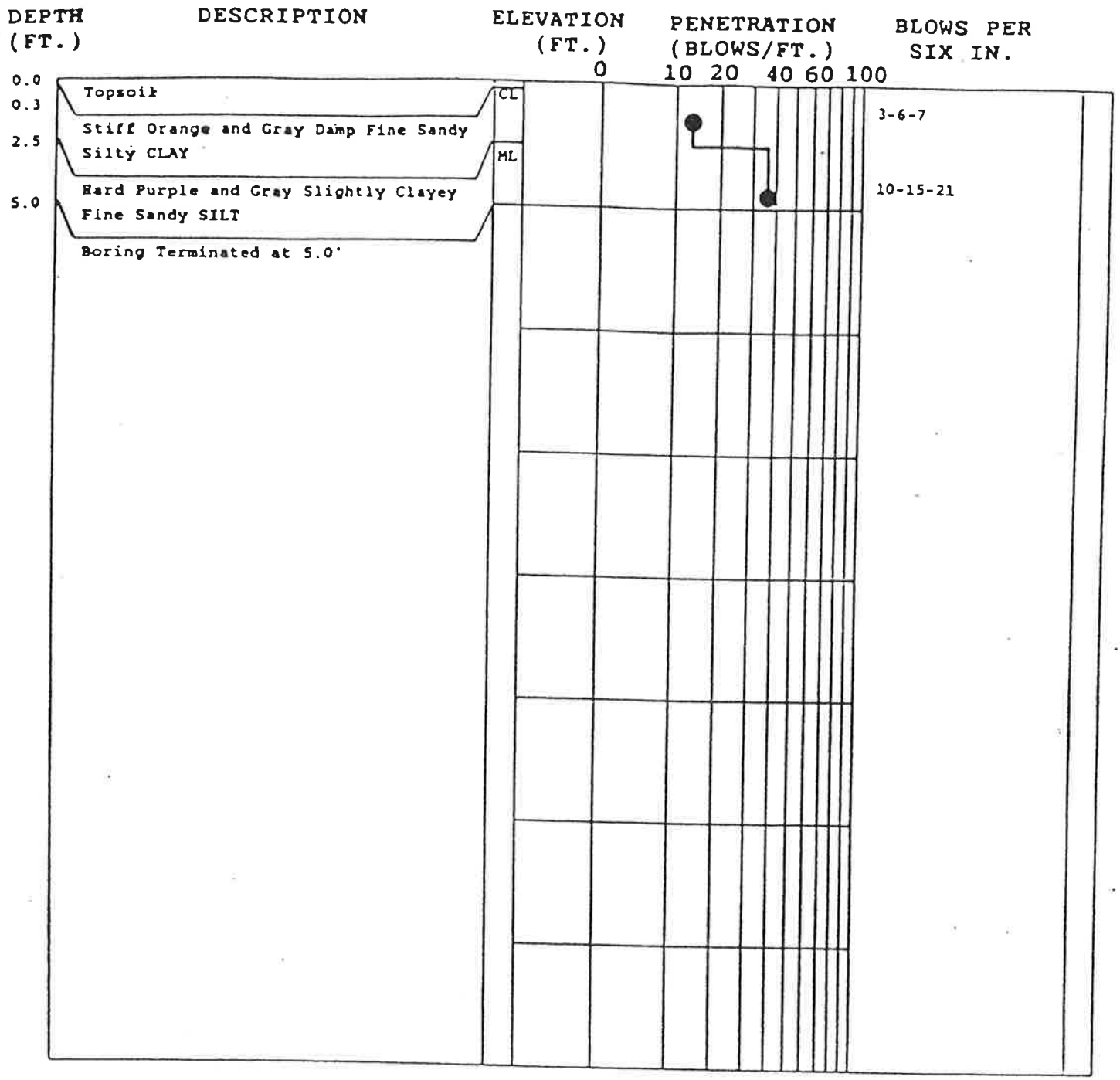


REFER TO ATTACHED SHEET FOR EXPLANATIONS AND SYMBOLS

JOB NUMBER 051-88-232
BORING NUMBER B-4
DATE 04-13-88

S&ME

TEST BORING RECORD



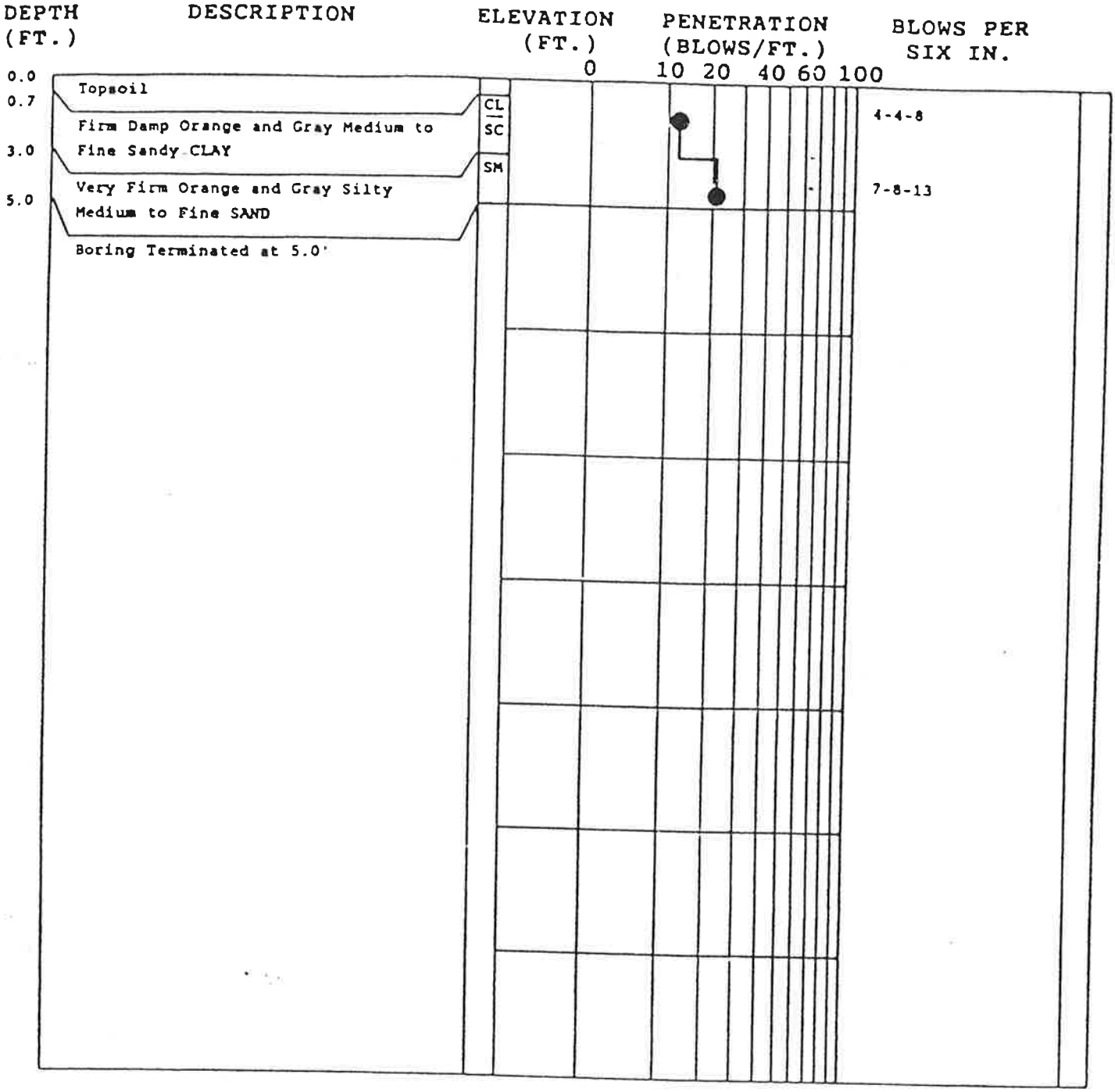
REFER TO ATTACHED SHEET FOR EXPLANATIONS AND SYMBOLS

JOB NUMBER 051-88-232
BORING NUMBER B-5
DATE 04-13-88

S&ME

PAGE 1 OF 1

TEST BORING RECORD

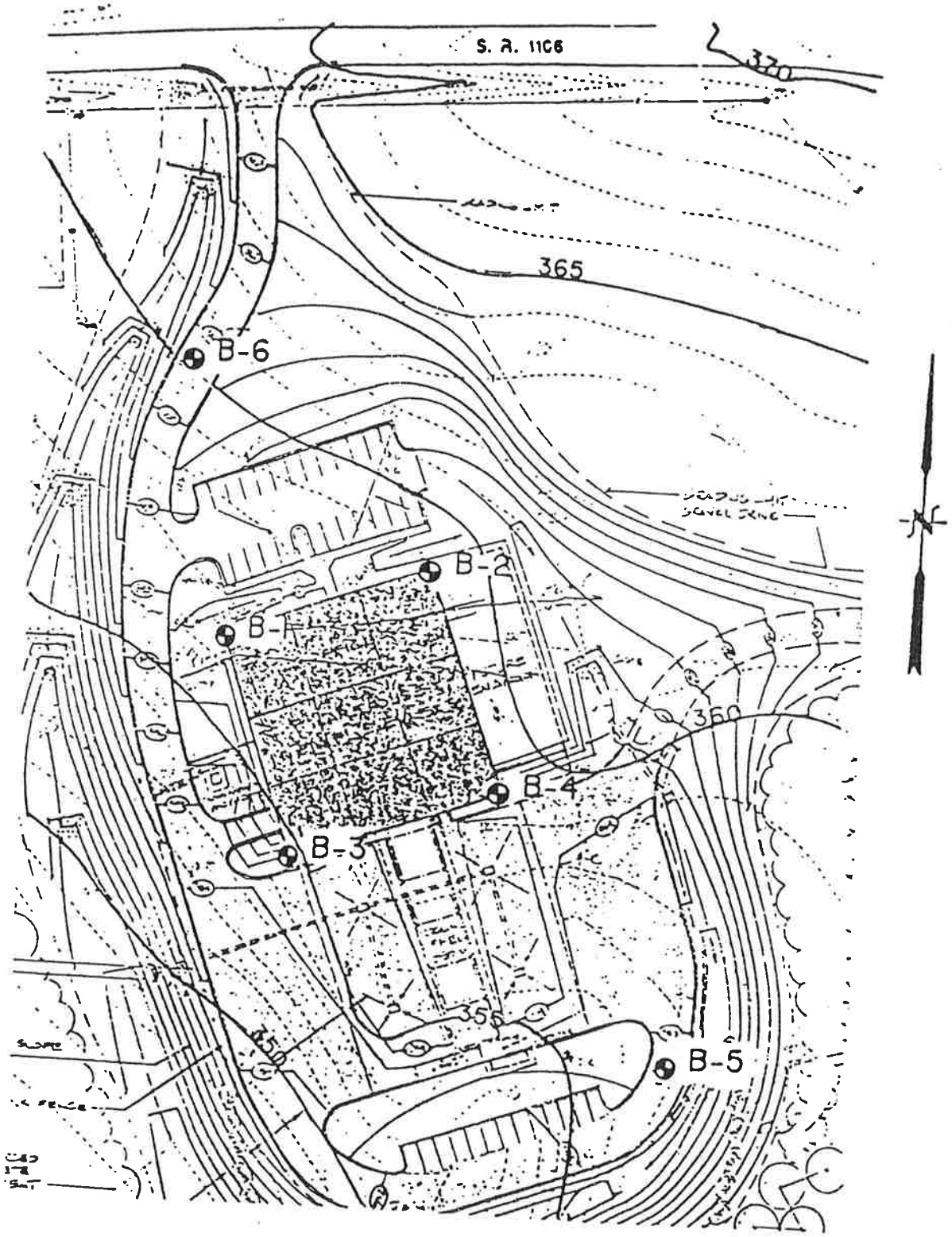


REFER TO ATTACHED SHEET FOR EXPLANATIONS AND SYMBOLS

JOB NUMBER 051-88-232
BORING NUMBER B-6
DATE 04-13-88

S&ME

Attachment L4(a)



PROJECT
AETC CORPORATION
BUTNER, NORTH CAROLINA

S&ME

SCALE: N.T.S.
JOB NO: 1051-88-232
FIG. NO: 1

ME-4

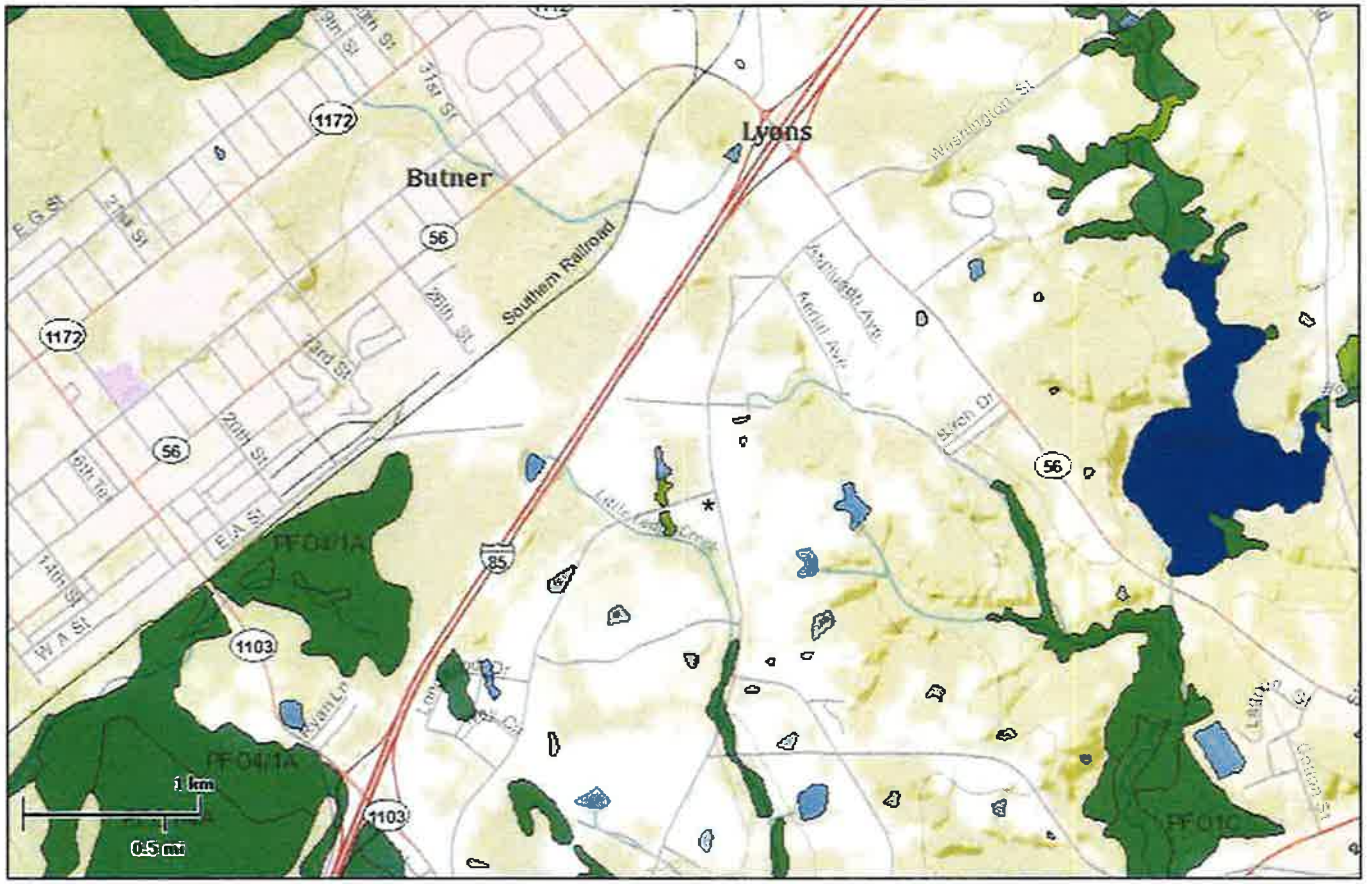
Attachment L5
Wetlands Map of Vicinity

U.S. Fish and Wildlife Service

National Wetlands Inventory

Wetlands Map

Jul 26, 2010



Wetlands

- Freshwater Emergent
- Freshwater Forested/Shrub
- Estuarine and Marine Deetwater
- Estuarine and Marine
- Freshwater Pond
- Lake
- Riverine
- Other

Riparian

- Herbaceous
- Forested/Shrub

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

User Remarks:

Veolia Creedmoor, NC facility

Attachment L5
Wetlands Map of Vicinity

U.S. Fish and Wildlife Service

National Wetlands Inventory

Wetlands Map

Jul 26, 2010

Wetlands

- Freshwater Emergent
- Freshwater Forested/Shrub
- Estuarine and Marine Deetwater
- Estuarine and Marine
- Freshwater Pond
- Lake
- Riverine
- Other

Riparian

- Herbaceous
- Forested/Shrub

User Remarks:

Veolia Creedmoor, NC facility

ATTACHMENT L6

State of North Carolina
Department of Natural Resources and Community Development
Division of Parks and Recreation
512 North Salisbury Street • Raleigh, North Carolina 27611

James G. Martin, Governor
S. Thomas Rhodes, Secretary

Dr. William W. Davis
Director

August 17, 1988

Ms. Elise Lechner
Environmental Engineer
Advanced Environmental Technology Corporation
Post Office Box 13886
Research Triangle Park, North Carolina 27709-3886

Dear Ms. Lechner:

The North Carolina Natural Heritage Program has no records of rare or endangered plant and animal species or natural areas at the location of the proposed storage facility near Butner and Creedmoor. We do have numerous records of rare plant species within two miles of the site. All of these plants grow on Iredell soils, which are derived from weathering of the diabase rock that occurs extensively in the Butner area. A review of the soil mapping for Granville County shows that the proposed storage facility lies on Creedmoor soil series and Wahadkee soil series. These soils are widespread in the vicinity and generally do not contain rare plant species.

The nearest site of rare plant species is approximately one mile east-northeast of the proposed facility; two rare plant species grow on a dry road bank along SR 1111 near Lake Rogers. Approximately 1.2 miles north of the facility, in a powerline clearing, at least three rare plant species occur; the site is located at the corner of SR 1111 and SR 1112. The Natural Heritage Program has also identified at least one half dozen other sites of rare plant species in the Butner area that are farther from the proposed building.

If you need additional details of the plant species involved, or precise locations for them, please let us know. Thank you for contacting the Natural Heritage Program.

Sincerely,

Charles E. Roe

Charles Roe, Head
N.C. Natural Heritage Program

CR:jh
H/7

ATTACHMENT L7

North Carolina Department of Cultural Resources

James G. Martin, Governor
Patric Dorsey, Secretary

Division of Archives and History
William S. Price, Jr., Director

August 15, 1988

Ms. Elise Lechner
Environmental Engineer
Advanced Environmental Technology Corporation
P.O. Box 13886
Research Triangle Park, N.C. 27709-3886

Re: Permit to operate as storage facility
Granville County, ER 89-7177

Dear Ms. Lechner:

Thank you for your letter of August 8, 1988, concerning the above project.

We have conducted a review of the project and are aware of no properties of architectural, historic, or archaeological significance which would be affected by the project. Therefore, we have no comment on the project as currently proposed.

The above comments are made pursuant to Section 106 of the National Historic Preservation Act of 1966, the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106, codified at 36 CFR Part 800, and to Executive Order 11593, "Protection and Enhancement of the Cultural Environment."

Thank you for your cooperation and consideration. If you have questions concerning the above comment, please contact Ms. Renee Gledhill-Earley, environmental review coordinator, at 919/733-4763.

Sincerely,

David Brook, Deputy State
Historic Preservation Officer

DB:slw

ATTACHMENT L8

Melissa Hodges <mhodges@butnernc.org>
07/13/2010 11:57 AM

To "Jay.Beck@veoliaes.com" <Jay.Beck@veoliaes.com>
cc
bcc
Subject RE: TAX LISTINGS OF RESIDENCES & PROPERTY OWNERS WITHIN 1/4 MILE

History: This message has been replied to.

Jay, sorry to get back to you so late on this. The Veolia property is zoned LI or Light Industrial. I will create a new property owner list and send it to you this afternoon. I just got a recent update from the county.

Melissa Hodges
Butner Town Planner/Parks and Recreation Director
(919) 575-3031 phone
(919) 575-3034 fax
(919) 575-3032 Town Hall
mhodges@butnernc.org

From: Jay.Beck@veoliaes.com [mailto:Jay.Beck@veoliaes.com]
Sent: Wednesday, June 30, 2010 3:13 PM
To: Melissa Hodges
Subject: RE: TAX LISTINGS OF RESIDENCES & PROPERTY OWNERS WITHIN 1/4 MILE

Hi Melissa,

Hope everything has been well. I am beginning the process of putting information together for the permit renewal of the Veolia ES facility. I have acouple of questions that I thought you maybe able to help me with. Has there been any changes in the Residences & Property Owners located with in a 1/4 mile of the Veolia ES boundary / property lines. My next question is just to confirm the Zoning Districting. Back in 1989 a letter from the Granville County Planning Board zoned the Veolia facility as I-1 Prime Industrial District. Also in 1999 this was reconfirmed again before Veolia's last renewal. The zoning designation has not changed as far as I am aware BUT, could you confirm. Thanks for anytime given on these request.

J L BECK
OPERATIONS MANAGER
VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.
2176 WILL SUITT ROAD
CREEDMOOR, NC. 27522
PHONE: (919) 528-3996 EXT.140
FAX:(919) 528-4020

Melissa Hodges <mhodges@butnernc.org>

To "Jay.Beck@veoliaes.com" <Jay.Beck@veoliaes.com>
cc

ATTACHMENT L9

STATE OF NORTH CAROLINA
DEPARTMENT OF TRANSPORTATION

P. O. Box 15580
Durham, North Carolina 27704

September 20, 1988

JAMES G. MARTIN
GOVERNOR

JAMES E. HARRINGTON
SECRETARY

DIVISION OF HIGHWAYS

GEORGE E. WELLS, P.E.
STATE HIGHWAY ADMINISTRATOR

Ms. Elise Lechner
Environmental Engineer
AETC
P. O. Box 13886
Research Triangle Park, NC 27709

Dear Ms. Lechner:

We have completed our evaluation of the access routes to AETC's new facility located at the corner of SR1104 and SR1106 in Granville County near Butner. The main routes, map attached, to your site will be Interstate 85. Vehicles approaching the facility will exit at Exit 191 onto NC56, proceed approximately 0.25 miles to SR1108 (Telecom Drive). Vehicles proceed 0.9 miles south on SR1108 which becomes SR1104 and then turn right onto SR1106. The access drive to your site is approximately 0.1 mile from the intersection of SR1104 and SR1106.

Regarding the information you requested, Interstate 85 is designed to carry high volume truck and passenger vehicles. The travelway consist of two 24 feet wide lanes one in each direction with paved shoulders. The pavement surface is asphalt. NC 56 has three asphalt lanes, one travel lane in each direction with a center lane for turns. SR's 1108, 1104 and 1106 have 20 feet of bituminous treated pavement surface with earth shoulders.

All the intersections on the above routes have good site distances. There are no restrictions on any of the routes and no discernible problems.

If we can be of further assistance, please advise.

Sincerely,

L. E. Stegall, P.E.
Division Engineer

ESR:dh

Attachment

ATTACHMENT L10

NORTH CAROLINA
ENVIRONMENTAL MANAGEMENT COMMISSION
DEPARTMENT OF NATURAL RESOURCES AND COMMUNITY DEVELOPMENT
RALEIGH, NORTH CAROLINA
PERMIT FOR THE CONSTRUCTION OF A WELL

In accordance with the provisions of Article 7, Chapter 87, North Carolina General Statutes, and other applicable Laws, Rules and Regulations.

PERMISSION IS HEREBY GRANTED TO

Advanced Environmental Technology Corporation

FOR THE CONSTRUCTION OF A MONITOR WELL SYSTEM located southwest corner of the intersection of SR 1106 & 1104 in Triassic rocks in Granville County, in accordance with the application dated September 9, 1988, and in conformity with specifications and supporting data, all of which are filed with the Department of Natural Resources and Community Development and are considered a part of this permit.

This Permit is for well construction only, and does not waive any provision or requirement of any other applicable law or regulation.

Construction of a well under this Permit shall be in compliance with the North Carolina Well Construction Regulations and Standards (15 NCAC 2C .0108), other State and Local laws and regulations pertaining to monitoring well construction.

This permit will be effective from the date of its issuance until March 30, 1989 or as this date shall be amended and shall be subject to other specified conditions, limitations, or exceptions as follows:

1. Furnish copies of chemical analyses to the Division of Environmental Management.

2. Notify E. L. Berry upon completion to allow a well construction inspection.

Permit issued this the 20th day of September, 1988.

FOR THE NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION

R. W. Van Tilburg

R. W. Van Tilburg, Regional Supervisor
Division of Environmental Management

By Authority of the Environmental Management Commission
Permit No. 38-0107-WM-0022

ATTACHMENT L11

COUNTY OF GRANVILLE

CERTIFICATE OF OCCUPANCY

Date 10-20-88

This is to certify that the necessary inspections have been made for
(Owner) A.E.T.C.
at (Address) SR 1104 & SR 1104

and that the building meets the requirements of applicable County and State laws.

Building Permit # 1630
Electrical Permit # 8326
Energy Permit # 1074
Septic Tank Permit # N/A
Plumbing Permit # 969
Mechanical Permit # 843

BUILDING INSPECTOR

Section M

Personnel Training

(§264.16 and §270.14(b)(12))

I. Description of Introductory and Continuing Training

It is Veolia's policy that each employee handling chemical substances respect them and be aware of their potential hazards. In keeping with that objective, a training program has been developed to ensure waste-handling personnel can perform their duties safely and are able to respond to emergencies. Compliance with the North Carolina Hazardous Waste Regulations regarding personnel training (15A NCAC 13A .0109) serves as a guideline for the program.

During the training program, new and existing employees receive instruction on (1) the hazardous nature of chemicals and chemical wastes, (2) the evolution of environmental regulations and the importance of maintaining compliance, (3) proper identification, classification, and the packaging of wastes, (4) proper handling and storage procedures and (5) other topics as they relate to field service operations. The program is designed to ensure that personnel not only handle hazardous wastes in a safe manner but also respond properly to emergency situations.

The program developed by Veolia for training employees in the safe handling of hazardous waste has been organized into training manuals. Provisions are made for updating or revising text as necessary to ensure compliance with the terms of the TSDF permit as well as any new or current regulations on the federal and state level. The training manuals are kept on file at the facility. The training program is designed to assure Veolia personnel perform their duties in a way that ensures the facility's compliance.

The Veolia comprehensive training program incorporates (A) an initial orientation program that meets or exceeds the OSHA 24 hour requirement and (B) annual refresher training session(s).

A. Initial Orientation Program

The Veolia initial orientation program is administrated to all new employees involved in waste handling activities. The training program conducted in-house includes hazardous waste operations & emergency response and fundamentals of field/facility operations. A sample outline of this program is shown in Attachment M1. No employee will work in the field or in the facility unsupervised prior to receiving this orientation program. After receiving the initial orientation program, all field and facility personnel will receive a minimum of six months on-the-job-training working under supervision. Site-specific training is conducted during this period. All employees are required to complete the RCRA training within 6 months after the date of employment.

B. Annual Refresher Training

Veolia believes that frequent reinforcement and review of basic safety principles is paramount in providing a safe work environment. In order to maintain safety awareness, annual training arranged in modules is conducted. A sample list of topics included in the refresher training is given in Attachment M2.

All training programs have been developed to ensure compliance with RCRA and the North Carolina Hazardous Waste regulations as well as the training requirements under OSHA. The Veolia training program meets or exceeds the OSHA requirement of 24 hours of training for employees who handle hazardous waste and 40 hours of training for emergency response personnel.

II. Training Director's Qualifications

All hazardous waste-related training will be conducted under the guidance of the Environmental, Health and Safety Manager. The Environmental, Health and Safety Manager, who serves as "training director" for the hazardous waste management program at the facility, is responsible for

ensuring that all training associated with the hazardous waste management program is performed and documented in accordance with the applicable requirements.

The Environmental, Health and Safety Manager meets the following criteria:

- BA/BS degree;
- Environmental work experience within government and/or industry;
- A strong familiarity with the hazardous waste regulations in general, and the hazardous waste training program requirements in particular; and
- A summary of relevant job experience that is maintained on-site in his or her personnel training file.

III. Relevance of Training to a Job Position

The training program is tiered in some areas to provide training to personnel at levels that are relevant to their positions within the facility. All facility personnel that actively handle wastes, however, receive training for hazardous waste management, contingency plan implementation and emergency response.

IV. Recordkeeping

For each employee whose position is related to hazardous waste management, training documentation will be maintained at the facility including:

- Job title
- Name of the employee
- Job description and duties
- Documentation of completed training

Personnel records will be kept for current employees until facility closure, or for former employees, for 3 years from the date of last employment.

Attachment M1

Sample Initial Orientation program

Hazardous Waste Operations and Emergency Response

1. Safety Program Overview
    a. Purpose/Importance/Philosophy
    b. Veolia Safety History
    c. Ongoing Safety Programs-Purpose/Schedule
    d. Accident Reporting System
    e. Medical Surveillance Program
2. Safety Systems
    a. SOP's-Review/Use Availability
    b. Site Health and Safety Plan-Purpose and Use
    c. Spill Containment and Contingency Plans
3. Hazards Communication and Awareness
4. Fire Safety/Selection and Use of Fire Extinguishers
5. Toxicology
6. Air Monitoring
7. Introduction to Reactive Chemicals
8. Compressed Gas and Cylinder Safety
9. Personal Protective Equipment Selection and Use
10. Use and Maintenance of the SCBA and Hip-Air
11. Use and Maintenance of Air Purifying Respirator/Fit Test
12. Site Remediation and Emergency Response
13. Spill Control/Work Zones/Decontamination
14. Confined Space Entry and Non-Entry Rescue
15. Handling Flammable Liquids/Bonding and Grounding
16. Practical Field Service/Facility Exercise

Attachment M1 (continued)

Fundamentals of Field/Facility Service Operations

1. Overview of On-Site Job Completion
2. Chemistry and Chemical Compatibility Segregation
3. EPA Waste Codes
4. DOT Hazard Classes
5. Shipping Names
6. Labeling and Marking
7. Placarding
8. Shipping Paper Requirements
9. Packaging
10. Paper Work Completion
11. Shipping and Receiving Procedures
12. Reportable Quantity Values
13. Land Disposal Restrictions
14. Wastestream Information Profiles

Attachment M2

Sample Annual Refresher Training

1. Hazard Communication and Awareness
2. Personal Protective Equipment Selection and Use
3. Radiation and Biohazard Awareness
4. Toxicology
5. Use and Maintenance of the SCBA and Hip-Air
6. Use and Maintenance of Air Purifying Respirator/Fit Test
7. Handling Flammable Liquids/Bonding and Grounding
8. Site Control/Work Zones/Decontamination
9. Confined Space Awareness
10. Fire Safety/Selection of Use of Fire Extinguishers
11. Contingency Plan Review

Section N

Closure Plan and Cost Estimate

(§264.112, §264.142 and §270.14(b)(13) and (15))

This closure plan has been prepared in accordance with 40 CFR Part 264 Subpart G and 15A NCAC 13A .0109(h) for the Veolia facility. The Veolia facility operation is inherently a straight forward and simple process. The operation involves the storage of DOT acceptable containers in trailers for a short period of time prior to shipment off-site to an authorized hazardous waste disposal facility for ultimate disposal and the periodic consolidation of compatible solid and liquid wastes within transportation containers. At the completion of closure activities, all hazardous waste, contaminated media, equipment, and supplies will be removed from the facility. In accordance with 40 CFR §264.111, this will ensure that there will be no need for further maintenance, that there will be no post-closure escape of hazardous waste or hazardous constituents, and that all closure activities will be conducted in accordance with the applicable regulations in 40 CFR Part 264, subpart G and NCAC 13A .0109(h).

I. Closure Procedures

There will be no partial closure activities conducted at this facility. The following procedures will be implemented for the closure of the facility:

(a) Notify NCDEQ of intent to close the facility.

(b) Discontinue acceptance of hazardous waste at the facility by redirection to authorized hazardous waste facilities or to another Veolia permitted facility.

(c) Ship inventory of waste materials on-site to the pre-selected disposal sites.

(d) Visually inspect the concrete secondary containment system for evidence of spills. If evidence of contamination exists, contaminated concrete will either be decontaminated or removed. If removed, contaminated concrete will be containerized and shipped off site for disposal in accordance with all applicable regulations. If visual contamination is not evident, the

loading dock and containment system (concrete pads and trenches) will be pressure washed. The wash water will be collected, sampled, analyzed and disposed of in accordance with all applicable regulations. If the analysis indicates no contaminants above the levels found in the field blank, then the decontamination of the containment system will be considered complete. The pressure wash process will be repeated if contamination of the wash water is detected above the levels in the field blank. The wash waste, or rinsate, will be sampled and analyzed for all hazardous constituents managed at the facility.

(e) Conduct visual inspection of all trailers. Each trailer floor will be pressure washed. The water from the wash will be collected and analyzed to determine if any contamination exists. All decontamination water will be analyzed for the constituents identified on the priority pollutant list. This procedure will be repeated until the trailers are decontaminated. Veolia will demonstrate compliance with all applicable North Carolina state or EPA cleanup standards available at the time of decontamination. The water will be disposed of in accordance with all applicable regulations.

(f) Remove all trailers, other vehicles, equipment and supplies from the property.

(g) Sample and analyze ground water monitoring wells and conduct soil sampling and analysis.

(h) Remove all permanently mounted warning signs.

(i) Submit certification of closure within 60 days after the completion of final closure activities to the Regional Administrator, EPA Region IV and NCDEQ.

II. Maximum Inventory

The maximum inventory to be stored at this location is 1,600 55-gallon drums or the volumetric equivalent of other acceptable containers. There are no disposal activities at this facility. In order to address the worst-case condition, the maximum storage volume is used for the closure cost estimate. At the time of closure of the facility, all wastes will be shipped off-site in compliance with applicable regulations to a variety of pre-approved and fully permitted

hazardous waste treatment and disposal facilities based on the wastes' composition and classification. This may include hazardous waste combustion facilities, fuel blenders, landfills, wastewater treatment, and recycling facilities.

III. Post-Closure Care

There will be no wastes, residues, contaminated soils, or equipment remaining at the site after closure activities are complete. Therefore, no post-closure care is necessary at the facility.

IV. Schedule for Final Closure

It is anticipated that the operation at this facility will continue indefinitely. However, for the purposes of this plan, January of 2040 has been selected as the date when the Regional Administrator and NCDEQ will be notified that the facility will be closed. The following is a schedule for closure of the hazardous waste container storage area:

TYPICAL CLOSURE SCHEDULE

a.	Notification to Regional Administrator and NCDEQ that the facility will be closed	January, 2040
b.	Final volume of waste received	July, 2040
c.	Begin closure	August, 2040
d.	Final volume of waste removed from the facility	October, 2040
e.	Complete inspection of secondary containment, remove contaminated containment area, if necessary	November, 2040
f.	Sample and analyze groundwater monitoring wells	December, 2040

and soils.

g. Submit certification of closure to the Regional Administrator and NCDEQ — January, 2041

The total time for closure activities has been estimated at one hundred and eighty (180) days with the first ninety (90) days primarily used for removal of inventory from the site. Due to Veolia's operating procedures that include the pre-approval of wastes at the destination treatment or disposal facility, it is anticipated that the actual time required for the removal of inventory would be less than thirty (30) days. Therefore, the facility does not foresee any problems complying with the time frames established by the regulations.

V. Closure Cost Estimate

This closure cost estimate has been prepared on worst-case conditions with a maximum inventory of 1,600 55-gallon drums. The closure cost is adjusted annually for inflation. All closure cost estimates are based on the cost of Veolia hiring a third party to conduct the closure activities. The total closure costs listed below are slightly below taking the annual inflation rates that are located in the spreadsheet attached. The total costs when you take the applied inflation rates per year for the last 3 years are $544,582.93 and the total costs that Veolia estimated below are $545,603.00, which is a difference of $6.07 less than 1%

CLOSURE ACTIVITY	COST
Disposal and Transportation Costs for Remaining Waste Inventory	$ 336,535
Facility and Equipment Decontamination Costs	$ 83,475
Soil and Groundwater Sampling and Analysis	$ 12,473
Subtotal	$ 432,483
Contingency Expense (15%)	$ 64,872
Engineering Expense (10%)	$ 43,248
Independent Professional Engineer Certification	$ 5,000
Total Closure Cost	**$ 545,603**

Supporting Document of Closure Cost Activity

A. Disposal and Transportation

Disposal costs to remove inventory based on types of waste managed through the facility. All disposal costs are calculated at 400 pounds per drum, 1,600 total drums. Based on the CostPro analysis, it is estimated that the average cost for treatment and disposal of a drum is $195.50 which equates to $312,800 for the entire inventory.

Transportation costs to remove inventory based on types of waste managed through the facility with full trailers of waste transported to third party disposal sites. It is estimated that the 1,600 drums will require 20 truckloads. Transportation to each disposal or treatment facility is estimated to be 537 miles on average and the cost for a third party to transport the truckloads is $2.21 per loaded mile. As a result the cost to transport the waste inventory for off-site disposal and treatment is $23,735. Veolia reviewed rates to three (3) disposal facilities and took the average transportation rate plus fuel surcharges to calculate a rate of $2.21 per mile Veolia also took the average mileage of the three (3) disposal facilities which was 537 miles (see mileage rate sheet attached in Section N)

1.	Disposal costs for waste inventory	$ 312,800
2.	Transportation costs for waste inventory	$ 23,735
TOTAL DISPOSAL AND TRANSPORTATION COSTS:		***$336,535***

B. Cost to Decontaminate Facility and Equipment

The surfaces to be decontaminated measure 28,820 square feet and include the trailers, the loading dock, the concrete containment pad and the associated trenches. It is estimated that 865 hours of labor at a rate of $66/hour will be required to complete a double wash decontamination process. Approximately 19,992 gallons of wastewaters (rinsate) will be generated from the process. Wastewater will be collected in a frac tank which is staged on-

site, and following sampling and analysis, the wastewaters will be transferred into bulk cargo tanks for transportation to an off-site disposal facility. Cost to dispose of wastewater at a facility located 200 miles away is $ 0.20/gallon.

1.	Labor and Equipment Costs for Decontamination	$ 57,063
2.	Frac tank – rental, mobilization and cleaning	$ 7,000
3.	Wastewater Sampling and Analytical Cost	$ 11,000
4.	Disposal of Washwater off-site	$ 4200
5.	Transportation of Washwater for disposal	$ 4212

TOTAL DECONTAMINATION COSTS: ***$83,475***

C. Cost to Analyze Monitoring Wells and Soils

The three existing groundwater monitoring wells will be sampled and analyzed for possible contamination. In addition, four soil samples will be collected and analyzed.

1.	Sampling and Analytical Costs for the groundwater wells	$5,250.
2.	Sampling and Analytical Costs for soils	$7,223.

TOTAL GROUNDWATER AND SOIL EVALUATION COSTS: ***$12,473***

SUB-TOTAL OF ITEMS A-C: ***$432,483***

D. Contingency Cost at 15% ***$ 64,872***

E. Engineering / contractor fees at 10% ***$ 43,248***

F. Independent Professional Engineer Certification ***$ 5,000***

TOTAL CLOSURE COST: ***$545,603***

Creedmoor Disposal Lanes

Facility	Miles	Rate	Cost per mile	Fuel Surcharge
Veolia Middlesex, NJ	446	900	2.01	2.24115
Veolia West Carrollton, OH	509	1025	2.01	2.24115
Clean Harbors Emelle, AL	656	1260	1.92	2.1408

Section O

Financial Assurance

(§§264.142 -.147 and §270.14(b)(15),(17))

In accordance with the requirements in 40 CFR Part 264 Subpart H and NCAC 13A .0109(i), the facility maintains acceptable financial assurance to cover the costs of facility closure and satisfy the liability requirements for bodily injury and property damage to third parties caused by sudden accidental occurrences. As required, the cost of closure is adjusted annually to account for inflation, or is recalculated using current rates for transportation, labor, and disposal costs. Current copies of both mechanisms are maintained at the facility and are submitted to NCDENR as required. A current copy of the Financial Guarantee Bond to cover the costs of closing the facility as delineated in Section N and the Hazardous Waste Facility Certificate of Liability Insurance are included as attachments O-1 and O-2, respectively.

VEOLIA
ENVIRONMENTAL SERVICES

TECHNICAL SOLUTIONS
NORTH AMERICA

June 1, 2016

Jenny W. Lopp
Financial Analyst
Green Square Complex
NC DENR
Division of Waste Management
Hazardous Waste Section
217 West Jones Street
Raleigh, NC 27603

RE: 2016 Inflation Adjustment for Closure
Veolia Environmental Services
NCD 986166338

Dear Ms. Lopp

Please find the newly revised Closure Cost Estimate for inflation along with the updated Schedule A for Veolia Environmental Services. The 2015 Closure Cost Estimate for Veolia Environmental Services of ($539,191.02) has been adjusted using the 2016 inflation factor of 1.010 which resulted in a revised estimate of ($544,582.93) for 2016.

Please contact me if there are any questions or concerns regarding the Closure Cost Inflation or The Schedule A form. I can be reached at 919-529-3223 or via email at jay.beck@veolia.com.

Sincerely,

J Leonard Beck
Facility Operations Manager
Creedmoor NC Facility
Veolia Environmental Services

Veolia ES Technical Solutions, L.L.C.
2176 Will Suitt Road, Creedmoor, North Carolina 27522
tel: 919 528 3996 - toll free: 800 322 8350 - fax: 919 528 4020
www.VeoliaES.com

SCHEDULE A

EPA Identification Number: NCD 986 166 338

Name of Facility: Veolia ES Technical Solutions, L.L.C.

Address of Facility: 2176 Will Suitt Road
Creedmoor, NC 27522

Current Closure Cost Estimate: ($544,582.93)

Date of Estimate: February, 4th, 2016

VEOLIA
ENVIRONMENTAL SERVICES

TECHNICAL SOLUTIONS
NORTH AMERICA

July 05, 2016

Jenny W. Lopp
NCDENR Office Building
Division of Waste Management
Hazardous Waste Section
217 West Jones Street
Raleigh, North Carolina 27603

RE: Adjustment to Closure Cost reflected in Rider Surety Bond

Dear Ms. Lopp:

Enclosed is the updated Rider Surety Bond reflecting the New Closure Cost estimate for the Veolia ES Technical Solution, LLC, Creedmoor NC facility. This amount of ($544,582.93) was reflected in the Closure Cost estimate and the Schedule A form that was recently updated.

Should any questions arise, do not hesitate to contact me at 919-529-3223 or 919-528-3996 ext. 73223.

Sincerely,

J Leonard Beck
Facility Operations Manager
Creedmoor NC Facility
Veolia Environmental Services

Veolia ES Technical Solutions, L.L.C.
2176 Will Suitt Road, Creedmoor, North Carolina 27522
tel: 919 528 3996 - toll free: 800 322 8350 - fax: 919 528 4020
www.VeoliaES.com

EPA ID Number: NCD986166338

INCREASE RIDER TO SURETY BOND

PURPOSE: INCREASE

To be attached to Bond Number 301442 issued by Ohio Indemnity Company, as Surety in the amount of Five Hundred Thirty Nine Thousand One Hundred Ninety One and 02/100 Dollars ($539,191.02), on behalf of Veolia ES Technical Solutions, L.L.C., in favor of the North Carolina Department of Environment and Natural Resources

In consideration of the premium charged for the attached bond, it is mutually understood and agreed by the Principal and the Surety that the bond shall be modified to read as follows:

The above said bond amount shall be Five Hundred Forty Four Thousand Five Hundred Eighty Two and 93/100 Dollars ($544,582.93) effective the 4th day of February 2016.

All other items, limitations and conditions of said bond except as herein expressly modified shall remain unchanged.

Signed, sealed and dated this 4th day of February 2016.

Principal: **Veolia ES Technical Solutions, L.L.C.**

By: _____
Steve Hopper
EVP - COO

Surety: **Ohio Indemnity Company**

By: _____
Denise M. Fodor, Attorney-In-Fact

OHIO INDEMNITY COMPANY
COLUMBUS, OHIO
POWER OF ATTORNEY

DOCUMENT NO. A 5156 POWER NO. **301442**

KNOW ALL MEN BY THESE PRESENTS, that Ohio Indemnity Company, a corporation organized and existing under the laws of the State of Ohio with its principal office at 250 East Broad Street, 7th Floor, Columbus Ohio 43215, by and through the undersigned, its President, does hereby nominate, constitute and appoint: **Denise M. Fodor**

as its true and lawful Attorneys-in-Fact to make, execute, attest, seal, acknowledge and deliver for and on its behalf, as Surety, and as its act and deed, where required, any and all bonds, undertakings, recognizances and written obligations in the nature thereof, PROVIDED, however, that the obligation of the Company under this Power of Attorney shall not exceed Five Million Dollars ($5,000,000).

IN WITNESS WHEREOF, the Ohio Indemnity Company has caused its corporate seal to be affixed hereunto, and these presents to be signed by its duly authorized officers this 21st day of April, 2010.

OHIO INDEMNITY COMPANY

OHIO INDEMNITY COMPANY CORPORATE SEAL COLUMBUS, OHIO

BY: _____
John S. Sokol, President

BY: _____
Stephen J. Toth, Vice President

Notary Public)
State of Ohio) SS:

On this 21st day of April, 2010, before the subscriber, a Notary for the State of Ohio, duly commissioned and qualified, personally came John S. Sokol and Stephen J. Toth of the Ohio Indemnity Company, to me personally known to be the individuals and officers described herein, and who executed the preceding instrument and acknowledged the execution of the same and being by me duly sworn, deposed and said that they are the officers of said Company aforesaid, and that the seal affixed to the preceding instrument is the Corporate Seal of said Company, and the said Corporate Seal and signatures as officers were duly affixed and subscribed to the said instrument by the authority and direction of said Corporation.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my official seal at Columbus, Ohio, the day and year above written.

NOTARIAL SEAL STATE OF OHIO

OFFICIAL SEAL
SHERRY E. BIXLER
NOTARY PUBLIC, STATE OF OHIO
RECORDED IN PICKAWAY COUNTY
MY COMMISSION EXPIRES
01/06/2015

Sherry E. Bixler, Notary Public
My Commission Expires 01/06/2015

State of Ohio) SS:

I, the undersigned, Secretary of the Ohio Indemnity Company, a stock corporation of the State of Ohio, DO HEREBY CERTIFY that the foregoing Power of Attorney remains in full force.

Signed and sealed in Columbus, Ohio this 4th day of February 2016.

OHIO INDEMNITY COMPANY CORPORATE SEAL COLUMBUS, OHIO

BY: _____
Matthew C. Nolan, Secretary

Any reproduction or facsimile of this form is void and invalid.

UNI-POA-V6

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. LEXINGTON INSURANCE COMPANY, (the "insurer"), of 100 SUMMER STREET, BOSTON, MA 02110 hereby certifies that it has issued liability insurance covering bodily injury and property damage to Veolia North America LLC, (the "insured"), of 200 E Randolph Drive, Chicago, IL, 60601 in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at:

Named Address	**EPA Indentification Number**
Veolia ES Technical Solutions, LLC 2176 Will Suitt Road Creedmoor, NC 27522	NCD986166338

for sudden and non-sudden accidental occurrences. The limits of liability are $4,000,000 for each occurrence and $8,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number PLS 2032087, issued on January 1, 2016. The effective date of said policy is January 1, 2016.

2. The insurer further certifies the following with respect to the insurance described in Paragraph 1:

   a. Bankruptcy or insolvency of the insured shall not relieve the insurer of its obligations under the policy.

   b. The insurer is liable for the payment of amounts within any deductible applicable to the policy with a right of reimbursement by the insured for any such payment made by the insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).

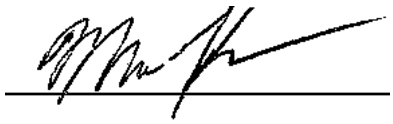
   c. Whenever requested by the Secretary of the Department of Environment and Natural Resources, the Insurer agrees to furnish to the Secretary a signed duplicate original of the policy and all endorsements.

   d. Cancellation of the insurance, whether by the Insurer, the insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Secretary.

   e. Any other termination of the insurance will be effective only upon written notice and only after the expiration of (30) days after a copy of such written notice is received by the Secretary.

I hereby certify that the wording on this instrument is identical to the wording specified in 40 CFR 264.151 (j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

CERTIFICATE ISSUED TO:
North Carolina Department of Environment and Natural Resources
Division of Waste Management, Hazardous Waste Section
1646 Mail Service Center
Raleigh, NC 27699-1646



Martine Houston
Sr. Underwriting Specialist
Authorized Representative of Lexington Insurance Company
500 W. Madison Street, Suite 3000, Chicago, IL 60661

EPA ID Number: NCD986166338

INCREASE RIDER TO SURETY BOND

PURPOSE: INCREASE

To be attached to Bond Number 301442 issued by Ohio Indemnity Company, as Surety in the amount of Five Hundred Thirty One Thousand Seven Hundred Forty Six and 57/100 Dollars ($531,746.57), on behalf of Veolia ES Technical Solutions, L.L.C., in favor of the North Carolina Department of Environment and Natural Resources

In consideration of the premium charged for the attached bond, it is mutually understood and agreed by the Principal and the Surety that the bond shall be modified to read as follows:

The above said bond amount shall be Five Hundred Thirty Nine Thousand One Hundred Ninety One and 02/100 Dollars ($539,191.02) effective the 10th day of February 2015.

All other items, limitations and conditions of said bond except as herein expressly modified shall remain unchanged.

Signed, sealed and dated this 10th day of February 2015.

Principal: **Veolia ES Technical Solutions, L.L.C.**

By: _____
Henry P. Karius, Assistant Treasurer

Surety: **Ohio Indemnity Company**

By: _____
Cheryl C. May, Attorney-In-Fact

OHIO INDEMNITY COMPANY
COLUMBUS, OHIO
POWER OF ATTORNEY

DOCUMENT NO. A 4883 POWER NO. **301442**

KNOW ALL MEN BY THESE PRESENTS, that Ohio Indemnity Company, a corporation organized and existing under the laws of the State of Ohio with its principal office at 250 East Broad Street, 7th Floor, Columbus Ohio 43215, by and through the undersigned, its President, does hereby nominate, constitute and appoint: **CHERYL C. MAY**

as its true and lawful Attorneys-in-Fact to make, execute, attest, seal, acknowledge and deliver for and on its behalf, as Surety, and as its act and deed, where required, any and all bonds, undertakings, recognizances and written obligations in the nature thereof, PROVIDED, however, that the obligation of the Company under this Power of Attorney shall not exceed Five Million Dollars ($5,000,000).

IN WITNESS WHEREOF, the Ohio Indemnity Company has caused its corporate seal to be affixed hereunto, and these presents to be signed by its duly authorized officers this 21st day of April, 2010.

OHIO INDEMNITY COMPANY

OHIO INDEMNITY COMPANY CORPORATE SEAL COLUMBUS, OHIO

BY: _____
John S. Sokol, President

BY: _____
Stephen J. Toth, Vice President

Notary Public)
State of Ohio) SS:

On this 21st day of April, 2010, before the subscriber, a Notary for the State of Ohio, duly commissioned and qualified, personally came John S. Sokol and Stephen J. Toth of the Ohio Indemnity Company, to me personally known to be the individuals and officers described herein, and who executed the preceding instrument and acknowledged the execution of the same and being by me duly sworn, deposed and said that they are the officers of said Company aforesaid, and that the seal affixed to the preceding instrument is the Corporate Seal of said Company, and the said Corporate Seal and signatures as officers were duly affixed and subscribed to the said instrument by the authority and direction of said Corporation.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my official seal at Columbus, Ohio, the day and year above written.

NOTARIAL SEAL STATE OF OHIO

OFFICIAL SEAL
SHERRY E. BIXLER
NOTARY PUBLIC, STATE OF OHIO
RECORDED IN PICKAWAY COUNTY
MY COMMISSION EXPIRES
01/06/2015

_____
Sherry E. Bixler, Notary Public
My Commission Expires 01/06/2015

State of Ohio) SS:

I, the undersigned, Secretary of the Ohio Indemnity Company, a stock corporation of the State of Ohio, DO HEREBY CERTIFY that the foregoing Power of Attorney remains in full force.

Signed and sealed in Columbus, Ohio this 10th day of February 2015.

OHIO INDEMNITY COMPANY CORPORATE SEAL COLUMBUS, OHIO

BY: _____
Matthew C. Nolan, Secretary

Any reproduction or facsimile of this form is void and invalid.

UNI-POA-V6

Section P

Containers

(§§264.170 - .179 and §270.15)

The maximum inventory of waste on site does not exceed 1,600 55-gallon drums or the cubic foot equivalent in other sized containers. Except as described below, all containers are stored on trailers that are designated for the ultimate disposal site or on trailers used for storage only. The trailers typically range in size from 40' to 53' in length and are able to store approximately 80-92 55-gallon drums when full (or 20-24 pallets of other sized containers). In addition, wastes may be stored in other units, such as cargo tanks and roll-off boxes provided sufficient secondary containment is provided and the total capacity limit is not exceeded. Material handling is conducted on a 24' by 130' concrete loading dock that can accommodate up to 20 trailers or other units, all of which can be used for material storage provided that the secondary containment requirements are satisfied in each independent section. All trailers and other units are be parked within the concrete containment area of the facility.

I. Description of Containers

The Veolia facility only accepts containers that are in good condition, have been properly packaged and are labeled in accordance with all DOT, EPA, and North Carolina Regulations. Due to the great diversity of waste materials accepted and the range of quantities generated by Veolia clientele, the number, sizes and types of containers accepted will vary greatly.

All materials are packaged in accordance with the specific packaging requirements set forth in the DOT Regulations. Commonly accepted containers include, but are not limited to, the following:

UN Specification Marking (DOT Specification Container)	Construction Material(s)	Capacity
1A2	Steel drum, removable head	5-gallon 10-gallon 30-gallon 55-gallon
1A1	Steel drum, non-removable head	5-gallon 30-gallon 55-gallon
6HA1	Steel drum, non-removable head, polyethylene lined	5-gallon 30-gallon 55-gallon
4G	Fiberboard boxes	10 lb 15 lb
4C2	Wooden boxes, steel nails	30 lb
1G	Fiber drum	30-gallon 55-gallon 10 lb 60 lb 115 lb
NA	Salvage Drum (Overpack)	10-gallon 85-gallon 110-gallon

While the above listed DOT acceptable containers represent the majority of container types accepted at the facility, the receipt of other containers also occurs, including non-DOT specification roll off boxes and dump trailers and DOT specification intermediate bulk containers (IBCs) and cargo tanks.

II. Container Management Practices

In order to ensure container integrity and maintain compliance with facility safety standards, the following operating procedures are implemented.

At the Generator's site, Veolia field service personnel inspect each container, making certain there are no leaks, ruptures, or other defects that may detract from the ability of the container to hold its contents. The containers are further checked to ensure proper closure and compatibility of container construction materials with the waste. If a container holding hazardous waste is not in good condition, or if it begins to leak, Veolia personnel transfer the waste from the defective container to a container that is in good condition, place the defective container into a salvage drum or manage the waste in some other way that complies with applicable regulations. Containers used are constructed of or lined with materials that will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired. An adequate supply of clean, empty containers and other emergency equipment accompany Veolia field service crews as they service customers.

Alternatively, for third party wastes (e.g., brokers) or for shipments received directly from the generator's facility, receiving personnel inspect the containers as they are off-loaded to ensure they are in acceptable condition for storage and transfer.

Hazardous wastes are transported to and from the facility by properly licensed and permitted hazardous waste transporters. Upon arrival at the facility, each container is inspected to ensure its integrity is acceptable. This inspection is performed by facility personnel who also check to ensure that the containers have been properly labeled and listed on the manifest. If a container holding hazardous waste is not in good condition, or if it begins to leak, facility personnel transfer the hazardous waste from the defective container to a container that is in good condition, place the defective container into a salvage drum, or manage the waste in some other way that complies with the North Carolina Hazardous Waste Regulations.

All containers remain closed except when it is necessary to sample or visually inspect the contents of the container, or to perform waste transfer associated with corrective or preventive action, or for the consolidation of compatible wastes to larger containers to reduce transportation costs and maximize economies of scale. In addition, labpacks may be opened for the purpose of repackaging or consolidation. Repackaging consists of placing the intact inner containers or receptacles into separate outer containers without consolidating the contents of the inner containers. Consolidation consists of the combining compatible wastes by pouring up into larger containers to reduce transportation costs and facilitate handling. At all times, container management practices comply with the Air Emission Standards for Tanks, Surface Impoundments, and Containers (i.e., Subpart CC) as described in Section VII.

Material handling is performed either manually, or with the use of equipment such as drum dollies, pallet jacks, or forklifts, depending on the container size and weight. All personnel involved with waste handling at the facility are trained in proper handling procedures.

No containers are opened, handled or stored in a manner that may rupture the container or cause it to leak. Facility personnel inspect areas where containers are stored on a daily basis. The inspections are recorded as outlined in Section F and note the following:

1) leaks or deterioration of containers caused by corrosion or other factors
2) open containers
3) swollen or bulged containers
4) improperly labeled containers
5) unidentified containers
6) cracks or corrosion in concrete pads and trenches (inspected on a daily basis)

Remedial or corrective actions are also recorded. Remedial or corrective actions include, but are not limited to:

1) transferring material to another like container
2) placing a leaking or corroded container into a larger container
3) cleanup of spills using absorbents, pads etc.

4) closing a container
5) relieving pressure in a container by carefully opening the container
6) properly identifying and/or labeling a container
7) repairing and/or sealing cracks and gaps in concrete containment pads and trenches

III. Container Storage Area

A. General Description of the Containment System

All trailers and other units storing hazardous wastes are parked within the secondary containment system. Containerized materials may include any of those found in the Part A application (Section A). The secondary containment consists of a concrete pad and trench system. On each side of the loading dock lies a concrete slab 130 feet in length and 59 feet in width. The slab is 6 inch thick concrete with mesh reinforcement over a polyethylene liner. The slabs slope 1% away from the dock towards a trench. The trench walls and base are constructed of 8-inch reinforced concrete. Site drawings 1-3 outline the containment system construction and design.

A 4-inch wide concrete separation curb bisects the base (perpendicular to the loading dock on each side) creating 4 independent sections or quadrants. Hazardous wastes in storage are segregated on the basis of physical and chemical compatibility as discussed in Section J. The concrete base and containment trench are inspected regularly for cracks and gaps as outlined in Section F.

The trench on each side of the dock is divided by a valve (see detail, Attachment A3, Site Drawing 3). This valve will remain in the closed position and will only be opened during routine cleaning of the trench. The trench, which runs north and south and parallel to the dock, is sloped 1% toward the south. All wash water will flow toward the deeper end of the trench, and, if contaminated it will be pumped into containers or a cargo tank motor vehicle for proper disposal. Uncontaminated stormwater may be discharged from the trench using a pump in accordance with the Stormwater Pollution Plan required by the facility's National Pollutant Discharge Elimination System (NPDES) permit.

The trenches on each side of the loading dock are segmented into two sections each 53 feet 10 inches in length by 1 foot 4 inches in width, with depth varying from 4 feet 2 inches to 5 feet 5 inches due to the sloping of the trench. The trenches are covered with a heavy duty gate.

The containment pad is inspected for leaks and spills on a daily basis as outlined in Section F. Small spills would be remediated with absorbent and larger spills would be pumped from the trench. All spill cleanup materials would be containerized and disposed of in accordance with all DOT, EPA and NCDEQ Regulations.

The entire loading dock area, base and trench is covered by a 130 foot by 140 foot 26-gauge galvanized panel rib roof. The roof extends beyond the outermost edge of the concrete containment pad on both sides of the dock.

B. Structural Integrity of Base

The 6-inch reinforced (3,000 psi) concrete base is constructed over compacted subgrade, a polyethylene liner and wire mesh. The perimeters of the concrete slabs are raised 2 inches above the surrounding slab. Expansion joints of the slabs are located in these raised areas. Control joints are installed approximately every 16 feet. These joints as well as the expansion joints have been installed with a flexible water stop. In addition to the waterstop, all joints are sealed on the surface. The walls of the trench are stabilized with 1-foot square concrete compression struts positioned every 15 feet 8 inches along the length of trench. The base is free of cracks and gaps and is sufficiently impermeable to contain leaks and spills.

C. Standing Liquids in Containment System

The active portion of the facility (i.e. loading dock, concrete base and trenches) is covered by a 26-gauge galvanized panel rib roof. The roof prevents most precipitation from accumulating in the trenches. Only incidental precipitation from non-vertical rain

events accumulates within the containment trenches. The concrete containment pad is sloped 1% toward the trench system so that should a spill occur, there would be no standing liquids on the containment pad. The containment pad is inspected daily for leaks and spills.

Any leaks or spills would be remediated and all spill clean up materials would be containerized and managed in accordance with applicable regulations.

D. Containment System Capacity

The trench system is designed to collect spills from the active area of the facility. The containment system capacity exceeds the regulatory requirement of ten (10) percent of the maximum storage volume of the facility. The facility has a maximum total storage volume of 1,600 55-gallon drums or 88,000 gallons. Ten percent of this volume equals 8,800 gallons or 1,176 cubic feet. The total containment capacity in the trenches in the 4 quadrants equals 9,542 gallons (1,275 cf) thereby exceeding the regulatory requirement. In addition, with the permitted storage limit of 88,000 gallons divided equally among the 4 quadrants, the required secondary containment capacity for each quadrant is 2,200 gallons. Refer to Attachment A6, pages 5 and 6 for trench capacity calculations for each quadrant showing that this minimum capacity requirement is exceeded for each quadrant.

The trench capacity is designed to exceed the regulatory requirement, thereby allowing for the collection of incidental rainwater caused by blowing winds. The trench system is identical on either side of the loading dock. Each side contains two trenches 53 feet, 10 inches in length by 1 foot, 4 inches in width, with depth varying from 4 feet, 2 inches to 5 feet 5 inches in depth. The two trenches on either side of the dock are connected by a 6-inch gate valve which normally remains in the closed position. The gate valve is only opened when cleaning the trench to allow wash water to flow from one side to the other for collection. Stormwater discharges from each trench are performed in accordance with NPDES Permit No. NCS000175. In the event of a spilled material traveling into a trench, the spilled material will be collected and containerized for proper disposal.

An additional containment trench is located in the SE quadrant of the facility. This trench is constructed perpendicular to and ties into the trench which runs parallel to the loading dock. The capacity of this trench is 4,615 gallons, which, combined with the capacity of the existing trench, enables the facility to store up to a 7,000 gallon cargo tank in that quadrant.

E. Run-on

The accumulation of precipitation within the active area is limited by the roof over the loading dock and secondary containment. In addition, as shown in detail on the enlarged Attachment A2, Site Drawing 2, the grading on site is sloped away from the active contained area to prevent run-on. The area adjacent to the contained, roofed area is an asphalt drive constructed of 2" asphalt over 3" of binder over 6" of compacted ABC stone. The elevation of the area between the contained portion of the site and the asphalt drive is 354 feet. The site is sloped away from this contained area and to the southern portion of the site by grading to an elevation of 353 feet. All stormwater therefore flows toward the southern boundary where it exits the site in accordance with the facility's NPDES stormwater discharge permit through curb cuts in the perimeter concrete curbing.

F. Testing and Management Procedures for Accumulated Liquids

The containers, trailers, unloading and loading dock, and containment pad are visually inspected daily for evidence of leaks and spills. If a leaking container is identified and there are indications that it has reached the containment pad, the containment trench is inspected to determine if the spilled waste has migrated to that point. Small spills are remediated with the use of industrial absorbent. Large spills are pumped into containers. All spill cleanup materials are containerized and disposed of in accordance with applicable EPA and NCDEQ Regulations. The nature of the spilled material is determined by reviewing all paperwork, (e.g., manifests, labels, packing summaries, WIPs and container numbers), that accompanied the container or if necessary by chemical and physical analyses. After removing the waste from the containment trench and rinsing the containment pad and trench and any other affected areas with clean water,

the rinsate from the trench drains is analyzed for appropriate constituents to ensure that the area has been properly decontaminated. Veolia maintains the results of these tests on file at the facility.

G. Description of Container Storage Configuration

Containers are prepared for transport on trailers or transferred into other units that are backed up to the loading dock on the concrete contained area. Trailers and other units (e.g., roll–off boxes, cargo tanks, etc.,) are typically 8 feet wide and 40 to 53 feet in length. The loading dock measures approximately 24 feet in width by 130 feet in length and can accommodate up to twenty trailers or other units. Two feet of aisle space separates adjacent trailers or waste units parked on the same side of the loading dock. The specifications for the loading dock are included in Attachment A2, Site Drawing 2. Containers are temporarily staged on the loading dock during loading and unloading or during sampling, consolidation or transfer operations, however, no containers are stored on the loading dock overnight.

All materials are stored in trailers or in other units that are designated for an ultimate disposal site or in trailers used for storage only. The storage activity at Veolia occurs while materials are being prepared for shipment off-site. Typically the loading in a trailer or other unit is the result of successive additions from various generators of waste containers destined for the same ultimate disposal facility. This operating procedure allows materials to be on site for relatively short periods of time until a trailer or other unit is ready for shipment off-site. Due to these operating procedures, Veolia has distinguished between materials in storage and "materials being prepared for transportation" and is described as follows.

"Materials in Storage"

Incoming containerized wastes are placed into a trailer designated for the ultimate disposal site or into a trailer used for storage only. Alternatively, certain compatible wastes are consolidated into another transport unit, such as a roll-off box or cargo tank.

Waste containers are loaded from the front of a trailer to the back with a minimum of 18" aisle space maintained between double rows of containers or one row of palletized boxes. Approximately 57 to 66 55-gallon drums (depending on trailer size) can be loaded on a trailer before aisle space can no longer be maintained. Once the 18" aisle space is no longer maintained the trailer is considered "prepared for transportation" and the following "Materials Prepared for Transportation" procedures are applicable.

"Materials Prepared for Transportation"

Trailers destined for the disposal sites are sent off site within ten (10) working days after the accumulation start date. The accumulation start date is the date that aisle space is no longer maintained in the trailer. Each trailer has the accumulation start date posted near the rear of the trailer. Packing slip summaries for each container on each trailer are available for review.

Veolia only manages DOT acceptable containers the most common of which include steel and fiber drums, pails, and wooden and fiber cartons. For materials in storage trailers, 55-gallon or larger drums containing hazardous waste are not stacked in the trailers. Smaller containers are not stacked over 7 feet high. Cubic yard boxes may be stacked while in storage trailers. Once containers are in trailers prepared for transportation, stacking of containers is permitted provided it is in compliance with DOT regulations.

Prior to shipment off-site, all containers of hazardous waste are secured against movement. The methods of securing containers include bracing with load bars, palletizing and banding of fiber drums and palletizing and plastic wrappings of boxes and cartons as consistent with good transportation practices and DOT regulations.

A storage trailer may contain various combinations of container types and compatible waste types, depending upon the approvals and DOT packaging requirements of the ultimate disposal facility. At no time are storage configurations arranged so as to pose a threat to human health and the environment. Loading, transportation and storing of

hazardous waste containers is conducted in accordance with the DOT Segregation Table for Hazardous Materials in 49 CFR §177.848.

IV. Sample Inspection Forms

Section F outlines the daily and monthly inspections conducted at the facility. Facility personnel inspect the containers and areas subject to spills, such as the loading and unloading dock on a daily basis. Records of all inspections are maintained for a minimum of three years. Any deficiencies observed and corrective actions taken to remedy the deficiencies are noted on the inspection forms. Facility personnel performing the daily inspections receive instruction on proper inspection techniques and procedures.

V. Special Procedures For Incompatible Waste

Procedures describing the handling and storage of potentially incompatible wastes are described in Section J. Incompatible wastes are not placed into the same container, nor stored in the same quadrant, with the exception of labpack wastes due to their inherently safe construction. The storage of hazardous waste containers is conducted in accordance with DOT Regulations in 49 CFR §177.848 with the additional condition that acid waste is stored in a separate quadrant from caustic wastes

VI. Special Procedures for Ignitable and Reactive Waste

All hazardous wastes are stored a minimum of 50 feet from the property line. The Veolia site and surrounding area is zoned industrial. In the event the zoning is modified for the adjacent properties and the industrial zoning removed all ignitable and reactive wastes would be stored a minimum of 200 feet from the property line.

VII. Cylinder Procedures

Veolia presently routinely manages wastes which are gases or liquids contained in cylinders. These cylinders are received and stored at the facility in accordance with the

container management operations described in Section II above. Veolia also is following new cylinder Standard Operating Procedures in an effort to provide a more cost-effective service for the management of unwanted compressed gas cylinders while still maintaining safety and environmental compliance.

Veolia has been safely performing cylinder handling activities at customer locations and other Veolia TSDFs for over twenty (20) years. Only those Veolia personnel who have completed the Advanced Cylinder Training Program are permitted to perform the following standard operating procedures, "*Cylinder Pressure Checking (OPS-0105)" and "Cylinder Venting (OPS-0106)*", refer to Attachment P1.

Veolia proposes to perform a pressure check on individual cylinders, using an approved manifold system and safe practices as documented by the Compressed Gas Association (CGA). This procedure will only be completed on cylinders containing pure material with manufacturer's labels, and only non-toxic gases in cylinders, that is, only gases that are classified as 2.1 or 2.2 according to USDOT hazard class designation. Cylinders containing toxic gases, classified as 2.3 per USDOT, will not be pressure checked. Veolia has developed a Acceptable Cylinder Chart, Attachment P2, for use as a reference material for Veolia operations personnel to determine the proper DOT and EPA classification of materials in cylinders. Attachment P is an excerpt only of the full cylinder chart and is included as a sample of the type of information provided. Prior to performing a pressure check on a cylinder Veolia personnel will verify the classification of the gas and assure it is not a toxic material.

The work will be performed in a secure, well-ventillated area of the warehouse north of the loading dock. The exact location has not yet been determined as the operations has yet to be performed at the facility, however it will be in the warehouse in an area provided with adequate ventilation such as an area equipped with a fume hood. The pressure check will determine which cylinders are empty according to federal and state regulations (i.e. at atmospheric pressure). Cylinders identified as empty as a result of the will be decommissioned, and the metal will be sent off-site for recycling.

Furthermore, the controlled venting of cylinders containing non-flammable and non-toxic gases, that is, gases that are classified as 2.2 according to USDOT hazard class, will be performed in the same work area where the pressure checking of cylinders occurs Cylinders acceptable for venting meeting this classification include nobel, inert gases, and calibration gases. Following verification of the cylinder contents through review of the manufacturer labels, cylinder markings, and reference to the Veolia Acceptable Cylinder Chart, the gases will be vented to the atmosphere in a controlled manner through manifold valve connections. Only cylinders verified to contain the gases specified in Veolia procedure OPS-0106 will be managed according to this procedure. Specifically, the gases that qualify for venting as listed in OPS-0106 are:

1. Compressed Air
2. Argon
3. Helium
4. Krypton
5. Neon
6. Nitrogen
7. Xenon
8. Carbon Dioxide
9. Calibration gases that are non-toxic and non-flammable

There will be no hazardous wastes managed under this cylinder venting program.

VIII. 40 CFR Part 264 Subpart AA and BB

The facility does not management waste management units subject to RCRA Subpart AA and BB air emission control requirements.

IX. 40 CFR Part 264 Subpart CC

The facility takes appropriate measures to comply with 40 CFR Part 264 Subpart CC – Air Emission Standards for Tanks, Surface Impoundments, and Containers. While the

Subpart CC requirements apply to containers holding hazardous waste where the volatile organic concentration is 500 ppmw or greater, Veolia will manage all containers of hazardous waste with the assumption that they contain over 500 ppmw volatile organics. Note, there are no tanks or surface impoundments at the facility.

A. Containers Less than or Equal to 0.46 m^3

For containers that exceed 0.1 m^3 capacity but less than 0.46 m^3 that are not emptied within 24 hours after the container is accepted at the facility, facility personnel visually inspect the closed container and its cover to check for visible cracks, holes, gaps, or other open spaces into the container. Containers used for the storage of hazardous waste at the Veolia facility meet the applicable USDOT regulations for packaging hazardous materials. If a defective container closure is detected, facility personnel repair the defect in accordance with the requirements described immediately below:

In the remote instance that a container remains at the facility for a period of one year or more, facility personnel will visually inspect the container and its cover and closure devices initially and thereafter, at least once every 12 months, to check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position. If a defect is detected, Veolia will repair the defect in accordance with the requirements described immediately below.

When a defect is detected for the container, cover, or closure devices, facility personnel will make first efforts at repair of the defect no later than 24 hours after detection, and repair shall be completed as soon as possible but no later than 5 calendar days after detection. If repair of a defect cannot be completed within 5 calendar days, then the hazardous waste shall be removed from the container and the container shall not be used to manage hazardous waste until the defect is repaired.

Transfer of wastes into and out of containers for the purposes of consolidation will be performed in accordance with the requirements in 264.1086(c)(3) to control air pollutant emissions.

B. Containers Greater than $0.46m^3$

Containers having a design capacity greater than $0.46m^3$ will be managed in compliance with the Level 1 standards when not in light material service and Level 2 standards as detailed in 264.1086(d) when in light material service. Container types meeting this size category may include totes, rolloffs, and cargo tanks. Shipments of hazardous waste are commonly received in US DOT specification containers designed per 49 CFR 178. All containers will be kept closed unless they are being sampled or having wastes added per 264.1086(c)(3)(ii) for Level 1 standards, or per 264.1086(d)(3)(ii) for Level 2 standards.

The following procedures will be adhered to when receiving a container having a design capacity of greater than 0.46 m^3 which is determined not to be a US DOT specification container per 49 CFR 178. Note, to assure compliance with 264.186(c)(5), only those containers meeting the Level 2 standards may be used in light material service.

1. Containers not in light material service will be inspected to assure it satisfies the Level 1 standards in 264.1086(c)(1)(ii).
    a. The container will then be visually inspected looking closely at the cover and closure devices to check to visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position.

2. Containers in light material service will be inspected to verify compliance with Level 2 standards in 264.1086(d)(ii) or (iii).
    a. The container will then be visually inspected looking closely at the cover and closure devices to check to visible cracks, holes, gaps, or other open spaces

into the interior of the container when the cover and closure devices are secured in the closed position.

b. The container will then be tested for any sources of detectable organic emissions in accordance with the procedures specified in 40 CFR 265.1084(d).

c. If either the visual or emissions tests detected unacceptable conditions, the container (or closure) will be repaired and retested to determine if it meets the no detectable organic emissions requirements. Containers not meeting 264.1086(d) requirements will not be accepted and placed in storage.

C. Transfer Operations

Transfers of hazardous waste from containers that exceed $0.1m^3$ and contain greater than 500 ppmw volatile organics are conducted in such a manner as to minimize exposure of the hazardous waste to the atmosphere, to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices for handling flammables and other materials.

Whenever a hazardous waste that contains greater than 500 ppmw volatile organics is in a container that exceeds $0.1m^3$, Veolia ensures that the containers are properly closed and closure devices secured except in the following instances:

- Opening of a closure device or cover is allowed for the purpose of adding hazardous waste or other material to a container as follows:

  - In the case when a container is filled to the intended final level in one continuous operation, Veolia promptly secures the closure devices in the closed position and installs the cover, as applicable to the container, upon conclusion of the filling operation.

  - In the case when discrete quantities or batches of material intermittently are added to a container over a period of time, Veolia promptly secures the closure device

in the closed position and install a cover, as applicable to the container, upon either the container being filled to the intended final level; the completion of a batch loading after which no additional material will be added to the container within 15 minutes; the person performing the loading operation leaves the immediate vicinity of the container; or the shutdown of the process generating the material being added to the container, whichever condition occurs first.

- Opening of a closure device or cover is also allowed for the purpose of removing hazardous waste from the container as follows:

  - In the case when discrete quantities or batches of material are removed from a container but the container does not meet the conditions to be an empty container as defined in 40 CFR 261.7(b), Veolia promptly secures the closure devices in the closed position and install a cover, as applicable to the container, upon the completion of a batch removal after which no additional material will be removed from the container within 15 minutes or the person performing the unloading operation leaves the immediate vicinity of the container, whichever condition occurs first.

- Opening of a closure device or cover is allowed when access inside the container is necessary to perform routine activities other than the transfer of hazardous waste. An example of such activity is when an employee needs to sample the material in the container. Following the completion of the activity, the Veolia employee promptly secures the closure device in the closed position or reinstalls the cover, as applicable to the container.

Attachment P1

Veolia Environmental Services
Standard Operating Procedure

Title: Cylinder Venting
SOP #: OPS-0106
Department: Operations: Facility

Approval: John Dyer
Title: EH&S Manager
Effective Date: 08/10

Purpose: To provide for the safe, environmentally sound depressurizing and decommissioning of Inert and Nobel gas cylinders.

Scope/Applicability: This procedure is to be used to decommission only Inert and Nobel gases as noted on the Veolia Acceptable Cylinder Chart. All cylinders must be thoroughly inspected to verify contents. All procedural steps will be in accordance with the facility hazardous waste permit.

Users: Operations and Facility personnel who have completed the Advanced Cylinder Training Program.

Hazards: Improper handling can result in personal injury and/or potential release, spill or contamination.

Hazard Prevention:

- **Engineering +/or Administrative Controls:** All cylinder venting and decommissioning operations will take place in a well ventilated, permitted portion of the facility. Spill cleanup and emergency response supplies will be easily accessible. All Compressed Gas Association (CGA) safe practices will be followed.
- **Personal Protective Equipment:** Safety glasses, work uniform, steel-toed boots. Additional PPE as determined by Supervisor.
- **Exposure Monitoring:** Will be performed in accordance with the branch Industrial Hygiene Plan.

Specialized Tools/Equipment/Supplies: Specially designed stainless steel cylinder manifold.

Procedures:

1. All cylinders identified for pressure checking and venting will be inspected to insure that the cylinder is properly labeled and contains pure material that is identified as an Inert or Nobel gas per the Veolia Acceptable Cylinder Chart.
2. Specifically included in this category are Compressed Air, Argon, Helium, Krypton, Neon, Nitrogen, Xenon, and Carbon Dioxide. In addition, calibration gases that are non-toxic, non-flammable and not classified as a RCRA hazardous waste may be managed under this procedure.
3. The approved cylinder will be attached to the Veolia cylinder manifold.
4. The main cylinder valve will be opened and the cylinder pressure will be noted.
5. The cylinder will be safely vented by controlling the release with the manifold valves.
6. When the cylinder is determined to be empty (at atmospheric pressure) it will be decommissioned in accordance with CGA guidelines.
7. All decommissioned cylinders will be sent to an authorized facility for metal recycling.

Emergency Procedures: In the event of a spill on release, immediately notify supervisor and follow steps as outlined in the Facility Contingency Plan.

Attachment P2
Excerpt of Veolia Cylinder Chart

Material	VES	Hazard Classes			PG	UN/NA #	EPA ID #	Comments/Synonym/Isomer
		Pri.	Sub.	Sub.				
ACETALDEHYDE	3	3			I	UN1089	D001, U001	ACETIC ALDEHYDE, *Peroxide former*
ACETONE	2	3			II	UN1090	D001, U002	2-PROPANONE; DIMETHYL KETONE
ACETONITRILE	2	3			II	UN1648	D001, U003	METHYL CYANIDE, CYANOMETHANE
ACETYLENE, DISSOLVED	010	2.1				UN1001	D001	ETHYNE, *Asphyxiant*
ACETYL FLUORIDE	004	2.2				UN3163	NONE	METHYLCARBONYL FLUORIDE
ACROLEIN, STABILIZED	8C^{S}	6.1	3		I	UN1092	D001, P003	*ZONE A*, 2-PROPENAL, STABILIZED; **Special Approval from TWI (Doug Bushey) is Required!!!**
AIR, COMPRESSED	001	2.2				UN1002	NONE	
ALANE DIMETHYLETHYLAMINE COMPLEX	5	4.2	8		II	UN3185	D001, D003	ETHYL DIMETHYL ALANE
ALANE-TRIMETHYLAMINE COMPLEX (solid)	5	4.2	4.3		I	UN3393	D001, D003	TRIMETHYLAMINE ALANE; ALUMINUM HYDRIDE-TRIMETHYLAMINE COMPLEX
ALLENE, STABILIZED	003	2.1				UN2200	D001	**PROPADIENE, STABILIZED**
ALLYLENE	003	2.1				UN3161	D001	METHYL ACETYLENE, PROPYNE, PROPINE, *Polymerization Hazard*
ALLYL ALCOHOL	8	6.1	3		I	UN1098	D001, P005	*ZONE B;* 2-PROPENYL ALCOHOL; ALLYLIC ALCOHOL; 3-HYDROXYPROPENE; 2-PROPENOL; VINYL CARBINOL
ALLYL FLUORIDE	002	2.1				UN3161	D001	3-FLUOROPROPENE
ALLYLMAGNESIUM BROMIDE	7	4.3	8		I	UN3129	D001, D002, D003	*IN SOLVENT*
ALLYLMAGNESIUM CHLORIDE	7	4.3	8		I	UN3129	D001, D002, D003	*IN SOLVENT*
ALLYLTRIBUTYLTIN	8	6.1			III	UN2788	NONE	TRIBUTYL-2-PROPENYLSTANNANE
ALUMINUM DI(sec-BUTOXIDE) ACETONE	8	COM			III	NA1993	NONE	ALUMINUM DI(sec-BUTOXIDE) ACETOACETIC ESTER CHELATE
ALUMINUM DI(ISOPROPOXIDE) ACETONE	8	3			III	UN1993	D001	ALUMINUM DI(ISOPROPOXIDE) ACETOACETIC ESTER CHELATE
ALUMINUM ISOPROPOXIDE (solid)	5C^{S}	4.1	8		II	UN2925	D001	ALUMINUM ISOPROPYLATE; ALUMINUM TRIISOPROPOXIDE
ALUMINUM TRICHLORIDE (solid)	5C^{S}	8			II	UN1726	D003	TRICHLOROALUMINUM
AMINOPROPANE, 2-	8	3	8		I	UN1221	D001, D002	**ISOPROPYLAMINE**, 2-PROPANAMINE

Section Q
Solid Waste Management Units
(§270.14(d))

I. Identification of Solid Waste Management Units (SWMU)

The historical use of the site was undeveloped farmland prior to the commencement of hazardous waste operations by AETC in 1989. Since that time hazardous waste operations have consisted solely of container storage and transfer operations with limited container consolidation activities. Veolia has identified one SWMU at the facility, and that consists of the loading and unloading dock and concrete containment pad that surrounds it. This unit is clearly delineated in Attachments A1, A2, and A4 which include Site Drawings 1 and 2 and the topographic maps in Site Drawings 4A and 4B.

II Unit Operation

Hazardous waste transfer operations began within the SWMU in 1989 and have continued to the present.

III. Releases from Unit

Veolia maintains an internal incident reporting system to record and track all incidents occurring at the facility, including small leaks and spills. Veolia is also required to document all incidents that require the implementation of the facility's Contingency Plan (see Section H) in the facility's operating record. A review of these documents and discussion of the operating history of the facility with key personnel that were here from the onset reveals that at no time during the operating history of the facility did a release escape the facility's containment system.

IV. Groundwater Monitoring Analysis

As required by the facility's Part B permit, the facility maintains three groundwater monitoring wells on site, one up gradient and two down gradient. These wells are sampled annually for a large number of contaminants, including volatile and semi-volatile organics, metals, and pesticides. To date, there has been no detection of these contaminants in any of the wells at levels of concern. Groundwater monitoring data is maintained at the facility and is available for review by interested parties during normal business hours. Results of the most recent groundwater analysis results published were submitted to the agency in 2016.

Section R

Compliance and Financial Qualifications

(§270.11(d) and 15A NCAC 13A.0113(k))

I. Form of Business

Veolia ES Technical Solutions, L.L.C. (Veolia) is a limited liability company with a certificate of formation in Delaware on July 1, 2006. Attachment R1 includes a copy of the Certificate. Veolia's management team consists of fourteen corporate officers who are identified in Attachment R2.

II Identification of Hazardous Waste Management Facilities Owned and Operated

Veolia provides hazardous waste management services nationwide through a network of owned and operated hazardous waste management facilities. A listing of the Veolia facilities is found in Attachment R3. This listing also includes a description of the applicable permits held by these facilities.

III. Environmental Compliance

The compliance history for the Veolia Creedmoor facility is found in Attachment R4a. There have been no violations since 2009 for the Veolia Creedmoor facility from any federal, state or local agency. There are no pending enforcement actions against the facility at this time. In addition, the Creedmoor facility has never been denied an environmental permit.

A consolidated environmental compliance history for all the Veolia facilities listed in Attachment R3 is found in Attachment R4b. None of these Veolia facilities has been denied an environmental permit.

IV. Financial Qualification

Veolia's consolidated financial statements for 2014 and 2015 are included in Attachment R5. These documents support that Veolia is financially qualified to operate a commercial hazardous waste management facility in North Carolina.

ATTACHMENT R1

Delaware

The First State

I, HARRIET SMITH WINDSOR, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF AMENDMENT OF "ONYX ENVIRONMENTAL SERVICES, L.L.C.", CHANGING ITS NAME FROM "ONYX ENVIRONMENTAL SERVICES, L.L.C." TO "VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.", FILED IN THIS OFFICE ON THE ELEVENTH DAY OF APRIL, A.D. 2006, AT 10:14 O'CLOCK A.M.

AND I DO HEREBY FURTHER CERTIFY THAT THE EFFECTIVE DATE OF THE AFORESAID CERTIFICATE OF AMENDMENT IS THE FIRST DAY OF JULY, A.D. 2006.

Harriet Smith Windsor

Harriet Smith Windsor, Secretary of State

AUTHENTICATION: 4658983

DATE: 04-11-06

3020905 8100

060337562

State of Delaware
Secretary of State
Division of Corporations
Delivered 10:14 AM 04/11/2006
FILED 10:14 AM 04/11/2006
SRV 060337562 - 3020905 FILE

STATE OF DELAWARE
CERTIFICATE OF AMENDMENT

1. Name of Limited Liability Company: Onyx Environmental Services, L.L.C.

2. The Certificate of Formation of the limited liability company is hereby amended as follows: On July 1, 2006 the name of the limited liability company will become: Veolia ES Technical Solutions, L.L.C.

IN WITNESS WHEREOF, the undersigned have executed this Certificate on the 11th day of APRIL, A.D. 2006

By: Greig R. Siedor
Authorized Person(s)

Name: ______________________
Print or Type

Attachment R2

Report Name : Management Structure

Entity Name: Veolia ES Technical Solutions, L.L.C.

Name	Title	Role Start	Address
Arendell, Robert	Manager	03/01/2016	53 State Street, 14th Floor, Boston, MA 02109
DiCroce, William	Manager	03/01/2016	53 State Street, 14th Floor, Boston, MA 02109
Salgo, Jason	Manager	12/06/2013	53 State Street, 14th Floor, Boston, MA 02109
Arendell, Robert	Executive Vice President (General Counsel)	03/01/2016	53 State Street, 14th Floor, Boston, MA 02109
Cappadona, Robert	Senior Vice President	06/01/2014	4760 World Houston Parkway, Suite 100, Houston, TX 77032
DiCroce, William	President & CEO	03/01/2016	53 State Street, 14th Floor, Boston, MA 02109
Fawcett, Whitney	Assistant Secretary	04/01/2015	120 Water Street, Suite 212, North Andover, MA 01845
Ferrara, Francis X.	Vice President & Secretary	06/01/2014	120 Water Street, Suite 212, North Andover, MA 01845
Hopper, Steven	Executive Vice President & Chief Operating Officer	06/01/2014	4760 World Houston Parkway, Suite 100, Houston, TX 77032
Lynch, Kathleen	Assistant Secretary	06/01/2014	120 Water Street, Suite 212, North Andover, MA 01845
Salgo, Jason	Executive Vice President, CFO & Treasurer	06/01/2014	53 State Street, 14th Floor, Boston, MA 02109
Schrang, M. Scott	Senior Vice President	06/01/2014	4760 World Houston Parkway, Suite 100, Houston, TX 77032
Sullivan, Brian	Assistant Treasurer	06/01/2014	200 E. Randolph Street, Suite 7900, Chicago, IL 60601
Vosburg, Martin	Assistant Treasurer	06/01/2014	125 S. 84th Street, Suite 175, Milwaukee, WI 53214

Attachment R3

Veolia ESS Facilities and Permit Summary

Facility Name Address Telephone Site Contact	Type of Facility	HAPs Received	Part B Permit or Solid Waste Permit Number, Date of Issuance, and Expiration Date	Air Permit Number, Date of Issuance, and Expiration Date	NPDES / Waste Water Discharge Permit Number, Date of Issuance, and Expiration Date	NPDES / Stormwater Discharge Permit Number, Date of Issuance, and Expiration Date	TSCA Permit Number, Date of Issuance, and Expiration Date
Veolia 1704 W. First Street Azusa, California 800-395-6726 Env. Contact: John Flaminio John.flaminio@veolia.com Ron Daerr ron.daerr@veolia.com CAD008302903	Solvent Recovery Fuel Blending Store/Transfer	Yes	RCRA Part B Permit #CAD008302903; Issued: March 31, 2011 Expires: March 31, 2021 USDA Soil Permit-Number S-60306	Air Permits: 119501 Initially issued 1/91. Renewed annually.	Industrial Wastewater Discharge Permit #15242; Issued 5/30/2000	Stormwater Discharge Permit :Filed NOI State General Permit #419SO1535	N/A No TSCA Permit
Veolia 1125 Hensley Street Richmond, California 94801 510-233-8001 Env. Contact: John Flaminio John.flaminio@veolia.com John Maier john.maier@veolia.com CAT080014079	Store/Transfer 10 Day In-Transit	Yes	RCRA Part B permit; Issued 10/08/14 Expires 10/08/24	No Air permit	No NPDES permit	Stormwater Discharge Permit # 2 07S015121 Issued 01/01/04	N/A No TSCA permit
Veolia 9131 E. 96th Avenue Henderson, Colorado 303-289-4827 x109 Env. Contact: Tom Anckner Tom.anckner@veolia.com Jeff Leleszi jeffrey.leleszi@veolia.com COD 980591184	Solvent Recovery Fuel Blending Store/Transfer 10 Day In-transit	Yes	RCRA Part B Permit #CO-09-09-30-01 Effective: 09/30/2009 Expiration: 09/30/2019	Air Permit #95AD1089; Approval issued 03/18/2008	Zero Discharge Permit. #215. Effective: 10/26/12 Expiration: 10/26/2016	No Stormwater Discharge Permit Required.	No TSCA Permit Issued; Still operating under TSCA Application Authority

Veolia #7 Mobile Ave Sauget, IL Illinois 618-271-2804 x169 Env. Contact: Doug Harris Doug.Harris@veolia.com Dennis Warchol Dennis.Warchol@veolia.com ILD098642424	Incinerator Store/Transfer	Yes	RCRA Part B Permit #29; Issued 12/2/09. Effective : 1/6/10 Expires 12/2/2019 Above permit has been appealed so operation continues under the former permit that expired 5/5/98. CERCLA Approval Letter: Issued 6/29/85; No Expiration Date State of IL Explosive Magazine Permit No: 8020 Issued by IL Dept. of Mines and Minerals Issued: 3/1/04 Expires:2/28/16 Bureau of Alcohol, Tobacco & Firearms Explosive Magazine License: 3-IL-101-33-1G-12962 Issued 10/1/94	Title V Permit #V-IL-1716300103-08-01 Issued9/12/08 Effective: 10/12/08 Expires: 10/12/13 Issued by USEPA, Region 5 Written request for renewal submitted 180 prior to expiration. Application deemed administratively complete on 9/11/2013. Renewal pending.	NPDES Permit #IL0071552; Issued:12/9/09 Effective Date: 1/1/10 Expires: 12/31/14 Issued by IEPA-DWPC Application submitted on 6/30/14 Application Shield in place. Renewal pending.	POTW Discharge Permit #14-111 Effective: 2/1/14 Expires: 2/1/19 Issued by Village of Sauget.	N/A No TSCA Permit
Veolia, Hwy 73, 3.5 miles West of Taylor Bayou Port Arthur, Texas Texas 77640 409-736-2821 TXD000838896 Env. Contact: Dave Flood Dave.flood@veolia.com Dan Duncan Dan.Duncan@veolia.com	Incinerator Store/Transfer	Yes	RCRA Part B Permit #HW-50212-001/CP-50212-001; Issued: 08/20/04 Expires: 08/20/14** ***Renewal applications submitted. Permits and conditions remains in effect until state's renewal. The state does not provide documentation of extension.* TCEQ Permit WDW-160 and WDW-358 (Class 1 UIC wells) Issued: 01/15/15 Expires: 01/15/25 USDA issued Permit to Import Soils Permit No. S-57635 Issued: 05/28/13 Expiration: 03/28/16	New Source Review (NSR) Air Permit #42450 Issued: 12/12/14 Expiration: 12/12/24 Title V Air permit #01509 Issued: 02/13/13 Expiration: 02/13/18	TPDES Permit #02417 Issued: 07/10//13 Expires: 07/01/18 (stormwater and wastewater)	TPDES Permit #02417 Issued: 07/10/13 Expires: 07/01/18 (stormwater and wastewater)	TSCA Permit Issued: 12/6/12 Expires: 12/6/17

Veolia 4301 Infirmary Road, West Carrollton, Ohio 937-859-2207 Env. Contact: Derek Bedle Derek.bedle@veolia.com Regan Brunk regan.brunk@veolia.com OHD093945293	Solvent Recovery Fuel Blending Store/Transfer 10 Day In-Transit	Yes	RCRA Part B Permit #OHD093945293 Ohio Hazardous Waste Permit Permit #: 05-57-0056 Effective: 12/31/2013 Expiration: 12/31/2023	Synthetic Minor Air Permit Permit# P0106686 Issued: 9/12/2011 Expiration: 9/12/2016 PO 116415 Exp. 9/12/16	POTW Sanitary Permit #: 10-7086 Effective: 5/4/2010 Expiration: 12/31/2016	General Industrial Stormwater NPDES, #1GR00990*BG, expires on 07/1/2016	N/A No TSCA Permit
Veolia W124 N9451 Boundary Road Menomonee Falls WI 53051 262-255-6655 Env. Contact: Joe Baumann Joe.baumann@veolia.com Tom Daly Tom.Daly@veolia.com WID003967148	Fuel Blending Store/Transfer	Yes	RCRA Part B Permit: EPA ID WID003967148 Issued: 04/03/14 Expires: 4/03/24 WI Licenses (Renewed Annually) 03002-Non-haz Processing License-Expires 9-30-16 03135-Haz Waste Container Storage-Expires 9-30-16 06012-Haz Waste Tank Storage Expires:9-30-16 06013-Haz Waste Treatment (Stabilization and Bulking/Depacking) Expires: 9-30-16 ID#268201120-Lab Certification Expires: 8-31-16	Air Permit – Type A Registration Operation Permit # 268430470-ROPA Issued: 11/15/2011 No expiration	N/A No NPDES Permit	N/A	N/A

Veolia 125 Factory Lane Middlesex, New Jersey 08846 732-469-5100 Env. Contact: Kevin Anderson Kevin.anderson@veolia.com John Schantz John.Schantz@veolia.com NJD002454544 State Regulatory Agency: www.state.nj.us/dep/dshw	Solvent Recovery Fuel Blending Store/Transfer 10 Day In-transit	Yes	RCRA Part B Permit: HWP110001 Issuance Date: 09/30/2014; Effective Date: 10/30/2014: Expiration Date: 10/30/2019.	The facility operates six separate Air Pollution Control Permits under Plant ID# 15436: Storage Tanks: PCP120001 Expires: 05/04/2019 Auger/Hydrapulper: PCP030002 Expires: 05/04/2019 Boiler Unit: PCP100001 Expires: 10/30/2018 Distillation Units/Stills:PCP050001 Expires: 06/21/2019 Air Stripper A & B: PCP100002 Expires: 04/10/2017 Paint Can Crusher PCP110003 Expires: 04/30/2017	Middlesex County Utilities Authority Permit #11064 Expires: 9/30/16	Veolia discharges site storm water under NJPDES General Permit No. NJ0088315, NJPDES #: NJG0127477. This permit presently requires no discharge monitoring. Discharge Prevention Containment and Countermeasure/Discharge Cleanup and Removal Plan (DPCC/DCR): Veolia has an approved DPCC/DCR plan (DIFF# 121100235000). This plan renewal was effective January 26, 2011 and expires January 26, 2014. The renewal application was submitted and is being reviewed by NJDEP.	TSCA Waste Storage: Veolia Middlesex facility is approved as a commercial storer of TSCA waste (PCBs) pursuant to 40 CFR s761.65(d).
Veolia ES Alaron LLC (dba Alaron Nuclear Services) 2138 State Route 18 Wampum, PA 16157 724-535-5777 Env. Contact: Jeffrey Stahl Jeffrey.stahl@veolia.com Julian Owoc II julian.owoc@veolia.com PAD987400157 State Regulatory Agency: http://www.depweb.state.pa.us	Low Level Radioactive Serv. Center	No	Commonwealth of Pennsylvania, Department of Environmental Protection, Bureau of Radiation Protection, Radioactive Materials License Number PA-0678, Amendment 9. Issued: August 19, 2014 Expires: December 31, 2018	Commonwealth of Pennsylvania, Department of Environmental Protection, Bureau of Air Quality, General Plan Approval and General Operating Permit BAQ-GPA/GP-4 (Burn Off Ovens). Issued: August 31, 2012 Expires: August 31, 2017	N/A No Permit	N/A No Permit	N/A No Permit

Veolia 1 Eden Lane Flanders, New Jersey 973-691-3923 Env. Contact: Kevin Anderson Kevin.anderson@veolia.com John Schantz John.Schantz@veolia.com NJD980536593 State Regulatory Agency: www.state.nj.us/dep/dshw	Store/Transfer 10 Day In-Transit	Yes	RCRA Part B Permit Permit No: HWP110001 (Issuance Date: 09/27/2012; Expiration Date: 11/22/2016). Regulated Medical Waste Facility No: 494362 Permit No: RMC090001 (Issuance Date: 09/17/2009; Expiration Date: 09/17/2014) Renewal application is being reviewed by NJDEP.	N/A No Air Permit	N/A No NPDES Permit	Veolia discharges site storm water under a NJPDES General Permit Permit No: NJ0088315, NJPDES #: NJG0065102 PI ID #:49126 This permit presently requires no discharge monitoring. Permit expiration is 1/31/2018. DPCC/DRR Renewal letter DIFF#142700341000 Issued 1/24/14; Expires 3/16/16	TSCA Waste Storage: Veolia Flanders facility is approved as a commercial storer of TSCA waste (PCBs) pursuant to 40 CFR s761.65(d).
Veolia 2176 Will Suitt Road Creedmoor, NC 919-528-3996 Env. Contact: Jim Hughes Jim.Hughes@veolia.com John Dyer John.Dyer@veolia.com NCD986166338 State Regulatory Agency: http://wastenot.ehnr.state.nc.us	Store/Transfer 10-Day In-Transit	Yes	RCRA Part B Permit Issued 8/24/2012 Expires 8/24/2017	N/A No Air Permit	N/A No NPDES Permit	Stormwater Discharge under NPDES Permit # NCS000175; Issued 08/17/01; Effective 09/01/01 Renewal is Dec 2, 2013 Permit placed into NCDENR 11/2013 waiting to be issued	N/A No TSCA Permit
Veolia 5752 West Jefferson Street Phoenix, Arizona 85043 Env. Contact: Phillip Ditter Phillip.ditter@veolia.com (reports to Kevin Shauer) Wayne Bulsiewicz 602-233-2955 wayne.bulsiewicz@veolia.com AZ0000337360 State Regulatory Agency:http://www.adeq.state.az.us	Store/Transfer Universal / E-Waste 10 Day In-Transit	No	ADEQ RCRA Part B Permit Submitted 10/14/98 Expires 12/12/16 ADEQ Compliance Agreement issued 9/02. No Expiration Date	Air Quality Permit from Maricopa County, AZ #000139 Expires: 3/31/16	City of Phoenix CBZD-1402-10963 Expires - 12/31/2018	NPDES Permit AZMSG-2010-002	TSCA Permit AZ0000337360 Issued: 12/15/94 Expires: 12/31/99- Written request for renewal submitted 180 prior to expiration

Veolia 1275 Mineral Springs Drive Port Washington, WI 53074 Env. Contact: Kevin Shauer Kevin.shauer@veolia.com Phillip Ditter 262-2268-8908 phillip.ditter@veolia.com WID988566543	Store/Transfer Universal / E-Waste Hg Recycle 10 Day In-Transit	Yes	RCRA Permit: WID988566543 Issued 10/1/99 Under renewal WDNR License #6008 Issued 10/1/14 Expires 9/30/15 SW License: 03870 Issued 10/1/14 Expires 9/30/15	Air Operation Permit # 246076050-S01 Issued: 11/11/14 Expires 11/11/19 Air Construction Permit # 13-KB-181 Issued: 11/11/14 Expires: 5/11/16	Storm water General Permit #WI-S067857-03 Effective 8/20/2014 Expires 4/30/2016	NA	Meets Exemption Criteria
Veolia 342 Marpan Lane Tallahassee, FL 32305 Env. Contact: Phillip Ditter Phillip.Ditter@veolia.com Wayne Bulsiewicz 602-233-2955 wayne.bulsiewicz@veolia.com FL0000207449	Universal / E-Waste 10 Day In-Transit	No	RCRA Permit Number 71455-HO-009 Issued 9/19/07 Expires 9/26/2016	0730094-008-AG Expires: 5/15/17	NA	FLR05F873-003 Expires: 5/3/2019	NA
Veolia Contact: 90 Pleasant Street West Bridgewater, MA 02379 Kevin Shauer Kevin.shauer@veolia.com Phillip Ditter 262-243-8908 phillip.ditter@veolia.com MAC300017498	Universal / E-Waste Hg Recycle	No	MADEP Class C Recycling Permit: 1RC/2013 Issued: 03-28-2013 Expires: 03-28-2018	NA	NA	NA	USEPA Commercial Storage and Alternative Decontamination Approval Issued: 04-17-2013 Expired: 04-17-2023

Veolia ES Canada West
Owned and Operated Facility Permit Summary

Facility Name Address Telephone Site Contact	Waste Environmental Compliance Approval Permit Number, Date of Issuance, and Expiration Date if applicable	Air Permit Number, Date of Issuance, and Expiration Date if applicable	Waste Water Discharge Permit Expiration Date if applicable	Storm water Discharge Permit Number, Date of Issuance, and Expiration Date if applicable	TSSA (Technical Standards Safety Authority)	Hauled Sewage Waste Management System	Waste Management System	Waste Generator Number (Renewed Annually on the Hazardous Waste Information Network)
Veolia ES Canada Industrial Services Inc. 2-374 Crawford Street / South Porcupine, ON. P0N 1H0 tel +1 705 235 3955 Manager: Kirk Dicks EHS Contact: Talal Al Saied	PROVISIONAL CERTIFICATE OF APPROVAL WASTE DISPOSAL SITE NUMBER 4409-8GHSND Issue Date: May 20, 2011	NA	NA	NA	NA	NA	AMENDED WASTE MANAGEMENT SYSTEM A860427 Issued on: january 28, 2015	ON2801563
Veolia ES Canada Industrial Services Inc. 820 McKay Road, Pickering, ON, L1W 2Y4 tel +1 905 686 2111 Manager: Stephane Marleau EHS Contact: Talal Al Saied	ENVIRONMENTAL COMPLIANCE APPROVAL NUMBER 5750-8XPJ26 Issue Date: February 14, 2013	ENVIRONMENTAL COMPLIANCE APPROVAL NUMBER 4302-8XUH4M Issue Date: February 14, 2013	NA	ENVIRONMENTAL COMPLIANCE APPROVAL NUMBER 7289-974NAF Issue Date: April 29, 2013	NA	NA	AMENDED WASTE MANAGEMENT SYSTEM A860427 Issued on: january 28, 2015	ON7022144
Veolia ES Canada Industrial Services Inc. 4140 Belgreen Drive Ottawa, ON, K1G 3N2 tel +1 613 739 1449 Manager: Stephane Marleau EHS Contact: Talal Al Saied	ENVIRONMENTAL COMPLIANCE APPROVAL NUMBER A710141 Issue Date: May 2nd, 2012	AMENDED CERTIFICATE OF APPROVAL NUMBER 6172-6QBPQ2 Issue Date: September 27,20016	COMBINED DISCHARGE AGREEMENT W19-05 WITH CITY OF OTTAWA	CERTIFICATE OF APPROVAL INDUSTRIAL SEWAGE WORKS NUMBER 6685-8d2LF2 Issue Date: January 24, 2011	Petroleum Contractor Registration Number: FS R0076409358 Issue Date: 1 January, 2016 Expires On: December 31, 2016	WASTE MANAGEMENT SYSTEM (HAULED SEWAGE) A920362 Issued on September 1, 1998	AMENDED WASTE MANAGEMENT SYSTEM A860427 Issued on: january 28, 2015	ON1732702
Veolia ES Canada Industrial Services Inc. 141 Prosperity Way Chatham, ON,N7M 5J3 tel +1 613 739 1449 Manager: Matthew Baillargeon EHS Contact: Talal Al Saied	ENVIRONMENTAL COMPLIANCE APPROVAL NUMBER A710141 Issue Date: May 2nd, 2012	AMENDED CERTIFICATE OF APPROVAL NUMBER 6172-6QBPQ2 Issue Date: September 27,20016	COMBINED DISCHARGE AGREEMENT WITH CITY OF CHATHAM-KENT NO NUMBER ON FILE	CERTIFICATE OF APPROVAL INDUSTRIAL SEWAGE WORKS NUMBER 6685-8D2LF2 Issue Date: January 24, 2011	NA	NA	AMENDED WASTE MANAGEMENT SYSTEM A860427 Issued on: january 28, 2015	ON7238332
Veolia ES Canada Industrial Services Inc. 80 Birmingham Street Hamilton, ON, L8L 6W5 tel +1 905 547 5661 Manager: Jason Ewing EHS Contact: Talal Al Saied	NA	CERTIFICATE OF APPROVAL NUMBER 8-3474-97-006 3 Portable Bag Houses Issued on: September 5th, 1997 Requires address Update address from Burlington Name change Under Way	NA	NA	NA	WASTE MANAGEMENT SYSTEM (HAULED SEWAGE) A920352 Issued on: August 28, 1998	WASTE MANAGEMENT SYSTEM A8310 Issued on: June 18th, 1990 AMENDED WASTE MANAGEMENT SYSTEM A860427 Issued on: january 28, 2015	ON0042103

Veolia ES Canada Industrial Services Inc.
Owned and Operated Facility Permit Summary

Facility Name Address Telephone Site Contact	Waste Environmental Compliance Approval Permit Number, Date of Issuance, and Expiration Date if applicable	Air Permit Number, Date of Issuance, and Expiration Date if applicable	Waste Water Discharge Permit Expiration Date if applicable	Storm water Discharge Permit Number, Date of Issuance, and Expiration Date if applicable	TSSA (Technical Standards Safety Authority)	Hauled Sewage Waste Management System	Waste Management System	Waste Generator Number (Renewed Annually on the Hazardous Waste Information Network)
Veolia ES Canada Industrial Services Inc. **605 Scott Road** **Sarnia, ON, N7T 8G3** **tel +1 519 336 3330** **Manager: Tom Fitzpatrick** **EHS Contact: Talal Al Saied**	**NA**	**CERTIFICATE OF APPROVAL NUMBER 8-1159-95-006** **Portable Spray Booth and Baghouse** **Issued on: October 2, 1995**	**NA**	**NA**	**NA**	**NA**	**WASTE MANAGEMENT SYSTEM** **A8310** **Issued on: June 18th, 1990**	**ON6494351**
Veolia ES Canada Industrial Services Inc. **275 Campbell Street** **Sarnia, ON, N7T 2H2** **tel +1 519 336 3330** **Manager: Mike McLean** **EHS Contact: Talal Al Saied**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**AMENDED WASTE MANAGEMENT SYSTEM** **A860427** **Issued on: January 28, 2015** **WASTE MANAGEMENT SYSTEM** **A820552** **Issued on: March 30, 1993** **Requires Name Change from Onyx to Veolia**	**ON3568738**
Veolia ES Canada Industrial Services Inc. **459 Exeter Road** **London, ON, N6E 2Z3** **tel +1 519 668 3149** **Manager: Matthew Baillargeon** **EHS Contact: Talal Al Saied**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**WASTE MANAGEMENT SYSTEM** **A8310** **Issued on: June 18th, 1990**	**ON4137398**
Veolia ES Canada Services Industriels **48 Granby Street, Gatineau, Quebec, J8P 7G7** **tel +1 613 739 1449** **Manager: Stephane Marleau** **EHS Contact: Talal Al Saied**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**1147298807-01**
Veolia ES Canada Industrial Services Inc. **1705 3rd Avenue** **Montreal, Quebec** **H1B 5M9** **Manager: Stephane Marleau** **EHS Contact: Talal Al Saied**	**NA**	**NA**	**NA**	**NA**	**NA**	**NA**	**Mobile ECA HHW Management System ECA 2325-92PQZL** **Issued on: April 2, 2013**	**Generator Number of the address the household hazardous waste event takes place at**

Veolia (Creedmoor, NC) Permit Application
Environmental Compliance History for NCD986166338
Attachment R4a

Date of Violation	Description of Violation	Amount of Penalty Assessed	Amount of Penalty Paid	Court Docket Number
04/29/92	Failure to perform required daily inspections; and failure to include name of inspector on inspection log or summary.	None	NA	92-243
03/29/93	Failure to maintain complete training documentation records at the facility until closure.	None	NA	93-205
11/30/93	Failure to maintain updated waste information profile on-site as part of the facility operating record.	None	NA	94-043
06/27/94	Failure to equip the facility and make readily available the necessary equipment (halon fire extinguishers in storage trailers) to carry out the Contingency Plan; failure to maintain emergency equipment to assure its proper operation in time of emergency; and failure to maintain required aisle space in hazardous waste storage trailers.	None	NA	94-278
05/25/95	Failure to list all applicable constituents for which the offsite treatment facility is to monitor on the Land Disposal Restriction notification.	None	NA	95-539
03/19/96	Failure to maintain container stacking height in storage trailers at or below permitted minimum.	None	NA	96-132
05/22/96	Failure to list all applicable constituents for which the offsite treatment facility is to monitor on the Land Disposal Restriction notification.	None	NA	96-191
08/19/96	Failure to maintain required aisle space in hazardous waste storage trailer.	None	NA	96-221
10/14/96	Failure to maintain required aisle space in hazardous waste storage trailer; failure to list all applicable constituents for which the offsite treatment facility is to monitor on the Land Disposal Restriction notification; and failure to include the date of inspection and nature of repairs or remedial action on inspection log or summary.	None	NA	97-014
04/22/97	Compliance Order with Administrative Penalty of $10,560. Failure to maintain adequate aisle space in storage trailers containing hazardous waste; failure to mark each container of hazardous waste in storage with the date each period of accumulation begins.	$10,560	$10,560	97-153
11/20/98	Storage of hazardous waste beyond one year from the original date of receipt.	None	NA	99-054
02/25/00	Failure to submit required reports to State of Missouri, Department of Natural Resources, Division of Environmental Quality	None	NA	NA
08/12/03	Incompatible wastes stored together improperly, and a container not clearly marked to identify its contents and the date of each period of accumulation.	None	NA	NA
09/10/09	Failure to conduct analytical and qualitative monitoring of stormwater discharge outfalls for a specified period.	None	N/A	NOV-2009-SP-0021

Veolia ES Technical Solutions, L.L.C. in Creedmoor, NC has never been denied an environmental permit.

There are no pending enforcement actions against this facility at this time.

VEOLIA
ENVIRONMENTAL SERVICES

TECHNICAL SOLUTIONS
NORTH AMERICA

RCRA Compliance History
1999-2016
NCD986166338

Description Of Violation
Violation

1999	NO Violations
2000	Failure to submit required reports to the State of Missouri, Department of Natural Resources, Division of Environmental Quality.(The facility was registered with MO DNR as a generator shipping to a Missouri disposal facility. However, during the time period in question, the facility did not ship any material to a Missouri facility. The required report stating such was submitted immediately.) No Penalty was assessed.
2001	NO Violations
2002	NO Violations
2003	On August 12,2003 the Onyx Creedmoor facility was inspected by NCDENR and three issues were brought to the attention of the facility contact. The issues were in the storage area of the facility. There were two incompatible deficiencies. There was a Acid container noted to be within 4 feet of a Alkaline container. Issue two was a labpack container with a cyanide compound with in 4 ft of a Acid container. There was a cardboard labpack container with DOT labels but the hazardous waste label had been detached from the container. All of the above issues were addressed in a timely matter with the NCDENR inspectors. Onyx was assessed a NOV "BUT" NO fines were assessed.
2004	NO Violations as of December 31, 2004.
2005	NO Violation as of December, 31, 2005
2006	NO Violation as of December, 31,2006
2007	NO Violation as of December 31, 2007
2008	NO Violation as of December 31, 2008
2009	On September 10th, 2009 NCDENR-Division of Water Quality issued a Notice of Violation and Intent to Enforce for the failure to conduct analytical and qualitative monitoring at the storm water discharge outfalls during the first semi-annual reporting period of 2009. VES-TS response letter (October 8, 2009) is attached. No fines or any further action taken. No other issues through 2009.

Veolia ES Technical Solutions, L.L.C.
2176 Will Suitt Road, Creedmoor, North Carolina 27522
tel: 919 528 3996 - toll free: 800 322 8350 - fax: 919 528 4020
www.VeoliaES.com

2010	No Violation as of December 31,2010
2011	No Violation as of December 31,2011
2012	No Violation as of December 31, 2012
2013	No Violation as of December 31, 2013
2014	No Violation as of December 31, 2014
2015	No Violation as of December 31, 2015
2016	No Violation as of December 31, 2016

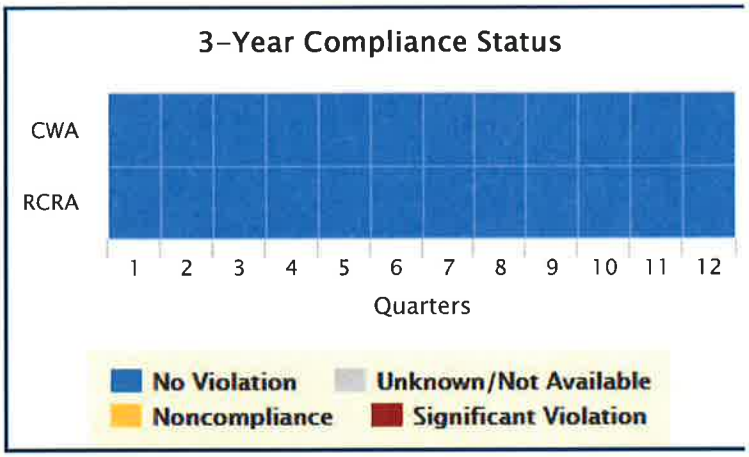
ECHO Enforcement and Compliance History Online

Detailed Facility Report

Facility Summary

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.
2176 WILL SUITT RD, CREEDMOOR, NC 27522

FRS (Facility Registry Service) ID: 110041964158
EPA Region: 04
Latitude: 36.13208
Longitude: -78.73
Locational Data Source: FRS
Industry: Waste Management and Remediation Services
Indian Country: N



Enforcement and Compliance Summary

Statute	Insp (5 Years)	Date of Last Inspection	Current Compliance Status	Qtrs in NC (Non-Compliance) (of 12)	Qtrs in Significant Violation	Informal Enforcement Actions (5 years)	Formal Enforcement Actions (5 years)	Penalties from Formal Enforcement Actions (5 years)	EPA Cases (5 years)	Penalties from EPA Cases (5 years)
CWA	--	--	No Violation	0	0	--	--	--	--	--
RCRA	294	03/14/2016	No Violation	0	0	--	--	--	--	--

Related Reports

- CWA Pollutant Loading Report
- CWA Effluent Charts

Regulatory Information

Clean Air Act (CAA): No Information
Clean Water Act (CWA): Minor, Permit Expired (NCS000175)
Resource Conservation and Recovery Act (RCRA): Active (HPA) LQG Operating TSDF TSDF Transporter (NCD986166338)
Safe Drinking Water Act (SDWA): No Information

Other Regulatory Reports

Air Emissions Inventory (EIS): No Information
Greenhouse Gas Emissions (eGGRT): No Information
Toxic Releases (TRI): No Information

Facility/System Characteristics

Facility/System Characteristics

System	Statute	Identifier	Universe	Status	Areas	Permit Expiration Date	Indian Country	Latitude	Longitude
FRS		110041964158					N	36.13208	-78.73
ICP	CWA	NCS000175	Minor: NPDES Individual Permit	Expired		01/31/2014	N	36.133056	-78.728056
RCR	RCRA	NCD986166338	LQG Operating TSDF TSDF Transporter	Active (HPA)			N	36.13245	-78.72987

Facility Address

System	Statute	Identifier	Facility Name	Facility Address
FRS		110041964158	VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.	2176 WILL SUITT RD, CREEDMOOR, NC 27522
ICP	CWA	NCS000175	VEOLIA ES TECHNICAL SOLUTIONS, LLC	2176 WILL SUITT RD, CREEDMOOR, NC 27522
RCR	RCRA	NCD986166338	VEOLIA ES TECHNICAL SOLUTIONS, LLC	2176 WILL SUITT ROAD, CREEDMOOR, NC 27522

Facility SIC (Standard Industrial Classification) Codes

System	Identifier	SIC Code	SIC Desc
ICP	NCS000175	8999	Services

Facility NAICS (North American Industry Classification System) Codes

System	Identifier	NAICS Code	NAICS Description
RCR	NCD986166338	562211	Hazardous Waste Treatment And Disposal

Facility Tribe Information

Tribal Name	EPA Tribal ID	Distance to Tribe (miles)

No data records returned

Enforcement and Compliance

Compliance Monitoring History (5 years)

Statute	Source ID	System	Inspection Type	Lead Agency	Date	Finding
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/10/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/10/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FINANCIAL RECORD REVIEW	State	10/08/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/06/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	12/11/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/05/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/13/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/28/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/09/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/18/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/31/2015	No Violations Or Compliance Issues Were Found

Statute	Source ID	System	Inspection Type	Lead Agency	Date	Finding
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/01/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/12/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	04/20/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/12/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	02/03/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/12/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/15/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/26/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	03/03/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/05/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	03/23/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/12/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	02/03/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	03/17/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FINANCIAL RECORD REVIEW	State	08/22/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	12/22/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/06/2016	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/13/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FINANCIAL RECORD REVIEW	State	09/04/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FINANCIAL RECORD REVIEW	State	10/17/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/04/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/13/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/07/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/25/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/25/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/09/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/21/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/21/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/09/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	03/31/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	12/10/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/15/2013	No Violations Or Compliance Issues Were Found

Statute	Source ID	System	Inspection Type	Lead Agency	Date	Finding
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/24/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/24/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/12/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/04/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	03/03/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/17/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/06/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/08/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	04/02/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/18/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/17/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/26/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FINANCIAL RECORD REVIEW	State	12/06/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/01/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/13/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	04/22/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	02/10/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/13/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/05/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/23/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	12/11/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	04/14/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/28/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	04/02/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	NON-FINANCIAL RECORD REVIEW	State	04/29/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/21/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	03/14/2016	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/17/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/03/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	12/13/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/17/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/12/2012	No Violations Or Compliance Issues Were Found

Statute	Source ID	System	Inspection Type	Lead Agency	Date	Finding
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	12/11/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/23/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/12/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/07/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/09/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	12/09/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	NON-FINANCIAL RECORD REVIEW	State	04/26/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FINANCIAL RECORD REVIEW	State	12/07/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	12/20/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/06/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/20/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FINANCIAL RECORD REVIEW	EPA	10/17/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	04/13/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	03/31/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	03/26/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/13/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	04/08/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	02/08/2016	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	02/11/2016	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/22/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/20/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/03/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/06/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/07/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/30/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/28/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/08/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/25/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/22/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/05/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/09/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/01/2012	No Violations Or Compliance Issues Were Found

Statute	Source ID	System	Inspection Type	Lead Agency	Date	Finding
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/11/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/16/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/07/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/30/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	12/10/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/31/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/01/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/01/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/17/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/02/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	02/26/2016	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FINANCIAL RECORD REVIEW	State	11/01/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/30/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/01/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	02/18/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/05/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/20/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/03/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/19/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	12/19/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	03/09/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	03/10/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/14/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/17/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/14/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	04/28/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/20/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/15/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/28/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/22/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	02/25/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/26/2015	No Violations Or Compliance Issues Were Found

Statute	Source ID	System	Inspection Type	Lead Agency	Date	Finding
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/04/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	03/12/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	03/15/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	12/14/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/09/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/30/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	04/30/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FINANCIAL RECORD REVIEW	State	07/13/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	04/03/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/09/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/08/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	04/03/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/27/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/13/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/14/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/14/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/14/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/08/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/18/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FINANCIAL RECORD REVIEW	State	10/08/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/25/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/27/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	02/06/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	03/11/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	04/29/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/06/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	12/05/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	03/15/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/22/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/09/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/17/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/17/2014	No Violations Or Compliance Issues Were Found

Statute	Source ID	System	Inspection Type	Lead Agency	Date	Finding
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/28/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/24/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/20/2016	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/29/2016	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	04/27/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/20/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	04/17/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	02/04/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	03/03/2016	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/23/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/08/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/12/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/07/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	12/03/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FINANCIAL RECORD REVIEW	State	02/06/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/20/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/21/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/25/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	12/18/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	04/25/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/02/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/07/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/13/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/16/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/07/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/28/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/14/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/10/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	04/27/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/01/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/14/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	03/24/2015	No Violations Or Compliance Issues Were Found

Statute	Source ID	System	Inspection Type	Lead Agency	Date	Finding
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	02/10/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	12/20/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/26/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/12/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/12/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/02/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	03/02/2016	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	12/30/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/17/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/23/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/12/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	12/04/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	02/05/2016	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	12/23/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/07/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/30/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/19/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/09/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/23/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	04/10/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	04/13/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/08/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	12/19/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	12/02/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FINANCIAL RECORD REVIEW	State	02/05/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	02/13/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/01/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/06/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/10/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/15/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/14/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	03/11/2013	No Violations Or Compliance Issues Were Found

Statute	Source ID	System	Inspection Type	Lead Agency	Date	Finding
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	03/20/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/26/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/17/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/01/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/16/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/13/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	02/03/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	03/25/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	02/11/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/01/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/28/2016	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	02/01/2016	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/03/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	02/22/2016	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/07/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/12/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	03/29/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	04/05/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/28/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/30/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	04/21/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/13/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	03/27/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	02/07/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/16/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	12/14/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/07/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/11/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/18/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/29/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/06/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/19/2012	No Violations Or Compliance Issues Were Found

Statute	Source ID	System	Inspection Type	Lead Agency	Date	Finding
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/15/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/09/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/29/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/03/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/24/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/27/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/25/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	02/12/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	COMPLIANCE EVALUATION INSPECTION ON-SITE	EPA	09/17/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/06/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	03/06/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	NON-FINANCIAL RECORD REVIEW	State	06/29/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/01/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/25/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/15/2016	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/30/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	02/19/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/21/2011	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	05/04/2012	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/19/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	NON-FINANCIAL RECORD REVIEW	State	05/05/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	03/06/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/04/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/24/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	04/01/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	02/20/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/28/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	03/07/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	12/15/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/20/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/01/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/15/2014	No Violations Or Compliance Issues Were Found

Statute	Source ID	System	Inspection Type	Lead Agency	Date	Finding
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/21/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	12/18/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	09/03/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	06/02/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/29/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/21/2014	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	12/09/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/15/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/29/2013	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/10/2015	No Violations Or Compliance Issues Were Found
RCRA	NCD986166338	RCR	FOCUSED COMPLIANCE INSPECTION	State	02/18/2014	No Violations Or Compliance Issues Were Found

Entries in italics are not considered inspections in official counts.

Compliance Summary Data

Statute	Source ID	Current SNC (Significant Non-compliance)/HPV (High Priority Violation)	Description	Current As Of	Qtrs in NC (Non-Compliance) (of 12)
CWA	NCS000175	No		12/31/2015	0
RCRA	NCD986166338	No		04/17/2016	0

Three Year Compliance Status by Quarter

Statute	Program/Pollutant/Violation Type	QTR 1	QTR 2	QTR 3	QTR 4	QTR 5	QTR 6	QTR 7	QTR 8	QTR 9	QTR 10	QTR 11	QTR 12	QTR 13*
	CWA (Source ID: NCS000175)	01/01-03/31 2013	04/01-06/30 2013	07/01-09/30 2013	10/01-12/31 2013	01/01-03/31 2014	04/01-06/30 2014	07/01-09/30 2014	10/01-12/31 2014	01/01-03/31 2015	04/01-06/30 2015	07/01-09/30 2015	10/01-12/31 2015	01/01-03/31 2016
	Facility-Level Status	No Viol	No Viol	No Viol	No Viol	No Viol	No Viol	No Viol	No Viol	No Viol	No Viol	No Viol	No Viol	Und

SNC (Significant Non-compliance)/RNC (Reportable Non-Compliance) History

*Quarter 13 is draft/unofficial and has not been fully quality assured. Read more

Statute	Program/Pollutant/Violation Type	QTR 1	QTR 2	QTR 3	QTR 4	QTR 5	QTR 6	QTR 7	QTR 8	QTR 9	QTR 10	QTR 11	QTR 12
	RCRA (Source ID: NCD986166338)	07/01-09/30 2013	10/01-12/31 2013	01/01-03/31 2014	04/01-06/30 2014	07/01-09/30 2014	10/01-12/31 2014	01/01-03/31 2015	04/01-06/30 2015	07/01-09/30 2015	10/01-12/31 2015	01/01-03/31 2016	04/01-06/30 2016
RCRA	Facility-Level Status												

Informal Enforcement Actions (5 Years)

Statute	Source ID	Type of Action	Lead Agency	Date

No data records returned

Formal Enforcement Actions (5 Years)

Statute	Source ID	Type of Action	Lead Agency	Date	Penalty	Penalty Description

No data records returned

ICIS (Integrated Compliance Information System) Case History (5 years)

Primary Law/Section	Case No.	Case Type	Lead Agency	Case Name	Issued/Filed Date	Settlement Date	Federal Penalty	State/Local Penalty	SEP (Supplemental Environmental Project) Cost	Comp Action Cost

Primary Law/Section	Case No.	Case Type	Lead Agency	Case Name	Issued/Filed Date	Settlement Date	Federal Penalty	State/Local Penalty	SEP (Supplemental Environmental Project) Cost	Comp Action Cost
Primary Law/Section	Case No.	Case Type	Lead Agency	Case Name	Issued/Filed Date	Settlement Date	Federal Penalty	State/Local Penalty	SEP (Supplemental Environmental Project) Cost	Comp Action Cost

No data records returned

Environmental Conditions

Water Quality

Permit ID	Combined Sewer System?	Number of CSO (Combined Sewer Overflow) Outfalls	Watershed (HUC (Hydrologic Unit Code) 8)	Watershed Name (HUC (Hydrologic Unit Code) 8)	Watershed (HUC (Hydrologic Unit Code) 12)	Watershed Name (HUC (Hydrologic Unit Code) 12)	Receiving Waters	Impaired Waters	Impaired Class	Causes of Impairment(s) by Group(s)	Watershed with ESA (Endangered Species Act)-listed Aquatic Species?
NCS000175			03020201	UPPER NEUSE	030202010501	Lodge Creek	Little Ledge Creek	No			Yes

Waterbody Designated Uses

Reach Code	Waterbody Name	Exceptional Use	Recreational Use	Aquatic Life Use	Shellfish Use	Beach Closure Within Last Year	Beach Closure Within Last Two Years
03020201000353	Little Ledge Creek	No	No	No	No	No	No

Air Quality

Non-Attainment Area?	Pollutant(s)
Yes	Ozone
No	Lead
No	Particulate Matter
No	Sulfur Dioxide

Pollutants

Toxics Release Inventory History of Reported Chemicals Released in Pounds per Year at Site ⓘ

TRI Facility ID	Year	Total Air Emissions	Surface Water Discharges	Off-Site Transfers to POTWs (Publicly Owned Treatment Works)	Underground Injections	Releases to Land	Total On-site Releases	Total Off-site Releases

No data records returned

Toxics Release Inventory Total Releases and Transfers in Pounds by Chemical and Year ⓘ

Chemical Name

No data records returned

Demographic Profile

Demographic Profile of Surrounding Area (3 Miles)

This section provides demographic information regarding the community surrounding the facility. ECHO compliance data alone are not sufficient to determine whether violations at a particular facility had negative impacts on public health or the environment. Statistics are based upon the 2010 US Census and American Community Survey data, and are accurate to the extent that the facility latitude and longitude listed below are correct. The latitude and longitude are obtained from the EPA Locational Reference Table (LRT) when available.

Radius of Area:	3	Land Area:	98%	Households in Area:	3,453
Center latitude:	36.13208	Water Area:	2%	Housing Units in Area:	3,825
Center Longitude:	-78.73	Population Density:	345/sq mi	Households on Public Assistance:	56
Total Persons:	9,553	Percent Minority:	47%	Persons Below Poverty Level:	3,317

Race Breakdown	Persons (%)	Age Breakdown	Persons (%)
White:	5,437 (56.91%)	Child 5 years and younger:	587 (6.14%)
African-American:	3,268 (34.21%)	Minors 17 years and younger:	2,279 (23.86%)
Hispanic-Origin:	998 (10.45%)	Adults 18 years and older:	7,275 (76.15%)
Asian/Pacific Islander:	97 (1.02%)	Seniors 65 years and older:	1,098 (11.49%)
American Indian:	60 (.63%)		
Other/Multiracial:	690 (7.22%)		

Education Level (Persons 25 & older)	Persons (%)	Income Breakdown	Households (%)
Less than 9th Grade:	652 (10.91%)	Less than $15,000:	443 (15.13%)
9th through 12th Grade:	637 (10.66%)	$15,000 - $25,000:	291 (9.94%)
High School Diploma:	2,162 (36.18%)	$25,000 - $50,000:	907 (30.98%)
Some College/2-yr:	1,823 (30.51%)	$50,000 - $75,000:	676 (23.09%)
B.S./B.A. or More:	701 (11.73%)	Greater than $75,000:	611 (20.87%)

Attachment R4b

Veolia ES Technical Solutions, L.L.C. - 5 Year Environmental Compliance History

Entity Name	Entity State	Enforcing Entity	Type of Action	Date of Initial Pleading	Allegation	Disposition Date	Disposition
VES - West Carrollton	Ohio	Ohio Environmental Protection Agency	Notice of Violation	5/13/11	A financial record review determined that the closure cost estimate was not updated and adjusted for inflation, and the financial assurance surety bond was not updated annually.	6/21/11	The required financial assurance documentation for closure was submitted by Veolia to the OEPA and determined to adequately address the deficiencies.
VES - Tallahassee	Florida	USEPA	Notice of Violation	8/9/11	Alleged violations for Failure to Meet Storage Regulations; Failure to Mark; Failure to Reconcile Manifest Discrepancies; Failure to Properly Manifest; and Failure to Maintain Proper Records.	5/1/13	USEPA has accepted Veolia's implemented corrective actions and response to the alleged violations. No penalty or NOV will be issued.
VES - Tallahassee	Florida	Department of Environmental Protection	Notice of Violation	9/12/11	Exceeded permitted limit between carbon filters on retort equipment.	10/12/11	Corrective actions completed. Penalty paid - $1,300.
VES - Nashua, NH	New Hampshire	New Hampshire Department of Environmental Services	Notice of Violation	10/1/11	The weekly inspection checklist used at the Nashua HHW facility operated by Veolia was not labeled as a "weekly" inspection; the facility failed to submit 2 manifest copies to the NHDES within 5 days of waste shipment; and two quarterly reports were submitted with errors.	10/22/12	All necessary corrective actions completed. Consent agreement negoitiated with NHDES for $1,800 penalty.
VES - Stoughton	Massachussetts	USEPA Region 1	Notice of Violation	11/1/11	Alleged failure to provide adequate emergency planning for the haz waste accumulation area, failure to manage lamps in a manner to prevent breakage, and failure to maintain complete training records.	11/8/11	Corrective actions completed. No further actions required at this time. Issue is considered resolved.
VES - Azusa	California	Department of Toxic Substances Control	Notice of Violation	12/1/11	During an April 2011 inspection the following deficiencies were noted regarding exceeding hazardous wastes storage capacities, improper recordkeeping for waste transfers, decanting waste in an unauthorized unit, and not using a certified lab for testing oil.	12/13/11	Corrective actions completed. Consent order signed and penalty of $14,000 paid.
VES - Middlesex	New Jersey	New Jersey Department of Environmental Protection	Notice of Violation	2/2/12	Failure to submit an unmanifested waste report within 15 days.	3/2/12	Report was submitted by VESTS however not within the required timeframe. No further action necessary.

VES - Port Arthur	Texas	Texas Commission on Environmental Quality	Notice of Violation	2/22/12	Failure to operate incinerator in compliance with the minimum and maximum operating parameters specified in the permit including, the minimum combustion temperatore, minimum voltage to the IWS and minimum power to the WESP, and excessive CO emissions.	5/9/12	Veolia had self-identified these deviations of the operating permit in the October 2011 Subpart EEE semiannual report. Veolia submitted a corrective action plan to the TCEQ on 4/6/12. TCEQ responded on 5/9/12 that the violations have been adequately resolved.
VES - Port Arthur	Texas	Texas Commission on Environmental Quality	Notice of Violation	2/29/12	Failure to maintain CO emissions below permitted limit. Failure to maintain required kiln temperature. Failure to maintain minimum voltage to the ionizing wet scrubber and minimum power to the wet electrostatic precipitator.	8/23/12	Submitted response to TCEQ with corrective actions. Received letter from TCEQ on 8/23/12 stating that the violations have been adequately resolved.
VES - Middlesex	New Jersey	New Jersey Department of Environmental Protection	Notice of Violation	5/2/12	Failure to maintain the secondary containment system in accordance with the facility's DPCC plan and to provide written notice to the NJDEP prior to the installation of fire fighting equipment and tanks.	6/7/12	Written procedures revised and submitted to NJDEP. Administrative consent order sigend and penalty of $3,600 paid.
VES - Flanders	New Jersey	New Jersey Department of Environmental Protection	Notice of Violation	5/24/12	NJDEP NOV for improper segregation of waste containers in storage at the facility	1/2/13	Corrective actions taken. Matter resolved and penalty of $4,500 paid.
VES - Port Arthur	Texas	Texas Commission on Environmental Quality	Notice of Violation	5/30/12	TPDES alleged violations for not collecting CBOD and ammonia samples during a discharge.	1/23/13	Response submitted by Veolia to the TCEQ NOV on 1/22/13. Response received from the TCEQ and no further action required.
VES - Sauget	Illinois	USEPA Region 5	Notice of Violation	8/27/12	Air Division issued Finding of Violation for issues related to Hg CEM, Hg feedrate and waste analysis. Similar Notice of Violation issued by Land Division on 9/17/12 for identical issues.	Pending	Veolia met with the agency on 9/19/12 and 11/5/12 to discuss the alleged violations. Future meetings are planned.
VES - Port Arthur	Texas	Texas Commission on Environmental Quality	Notice of Violation	12/14/12	Alleged RCRA violations for not removing accumulated precipitation in secondary containment, failure to implement spill prevention measures, failure to complete OJT for a driver.	5/22/13	Veolia submitted a written response to the TCEQ on 1/11/13. Received letter from TCEQ on 5/22/13 that no further action is required.
VES - West Carrollton	Ohio	Regional Air Pollution Control Agency	Notice of Violation	4/16/13	Monitoring, recordkeeping and reporting deficiencies noted during a November 8, 2012 agency inspection. Violations are to Permit-to-Install and Operate, NSPS, and NESHAP standards. Also, air permit non-compliance for deviations from the operating conditions for the cryogenic solvent recovery system identified for 2013-15 operations.	3/11/16	Veolia has responded to the violations identified by RAPCA and completed corrective actions. Penalty of $22,400 paid plus an SEP for $5,600.

VES - Port Arthur	Texas	Texas Commission on Environmental Quality	Notice of Violation	5/2/13	Failure to maintain minimum power to the wet electrostatic precipitator. Failure to conduct periodic audits of processes. Failure to maintain CO emission rate below permitted limit.	2/11/14	Veolia submitted a response to the TCEQ on 5/24/13. For the violation relating to the CO emissions, Veolia received an Agreed Order assessing a $13,050 penalty.
VES - Middlesex	New Jersey	New Jersey Department of Environmental Protection	Notice of Violation	7/18/13	NJDEP field inspection noted a violation for a tank pump that was operated in exceedance of its permitted flowrate and the stack height for the auger scrubber didn't conform to the permit.	4/21/14	Veolia submitted permit modification to correct the flowrate indicated in the permit. Penalty of $3,000 paid.
VES - West Carrollton	Ohio	Montgomery County Environmental Services	Notice of Violation	7/23/13	Discharge of wastewater had a pH that exceeded conditions in the permit.	Pending	Veolia is in the process of investigating the root cause of the exceedance and will be monitoring the pH prior to discharge.
VES - Flanders	New Jersey	New Jersey Department of Environmental Protection	Notice of Violation	10/9/13	NJDEP field inspection noted a violation for failure to comply with the requirements related to the management of containers due to a container leak.	10/29/13	Veolia completed correcting actions and submitted a letter to the NJDEP on 10/29/13. No further agency action required. No penalty.
VES - Middlesex	New Jersey	New Jersey Department of Environmental Protection	Notice of Violation	12/18/13	Notice issued for failure to prevent a spill outside of containment (1 liter of material).	12/18/13	Spill was immediately remediated and no further action is necessary. No penalty.
VES - Flanders	New Jersey	United States Environmental Protection Agency, Region 2	Civil Administrative Action	1/16/14	EPA alleges that Veolia shipped wastes containing PCBs on two occassions for disposal without properly identifying the PCBs on the manifest.	2/10/14	At the time of the shipments Veolia was not aware that the wastes contained PCBs. Veolia contends that in each case upon discovery of the presence of PCBs at the disposal facility through testing, Veolia promptly submitted Unmanifested Waste Reports to EPA (self-reported), and redirected the wastes to a TSCA facility for disposal. Penalty of $14,910 paid.
VES - Phoenix	Arizona	Arizona Department of Environmental Quality	Notice of Violation	1/21/14	AZDEQ alleges that Veolia failed to provide adequate preparedness systems, failed to manage containers as Universal Waste in compliance with regulations, and did not properly contain all waste materials.	4/3/15	This issued has been resolved in conjunction with NOV issued by the AZDEQ in 2009. Veolia has taken the necessary corrective actions and agreed to a settlement of the violations. The agreed monetary settlement is $360,000.

VES - Middlesex	**New Jersey**	**New Jersey Department of Environmental Protection**	**Notice of Violation**	**7/2/14**	**An air permit condition for VOC emissions was exceeded during a maintenance event when ethyl acetate product in a tank was inadvertantly heated and the materials released as vapor.**	**7/30/14**	**Veolia self-reported the incident and completed corrective actions. The initial proposed penalty of $3000 was reduced to $1500 and paid by Veolia. No further action required.**
VES - Richmond	**California**	**USEPA Region 9**	**Notice of Violation**	**8/8/14**	**Based on an agency inspection conducted on 7/10/14, the following potential issues were identified: (1) the epoxy coating in the storage bays was deteriorated in some areas, (2) sumps were observed containing water that required removal, (3) protective plastic curtains on storage bays required replacement.**	**10/8/14**	**Veolia has implemented corrective measures and has submitted a response to the DTSC on 10/8/14.**
VES - Middlesex	**New Jersey**	**New Jersey Department of Environmental Protection**	**Notice of Violation**	**8/28/14**	**A container holding hazardous waste was not marked with the accumulation start date as required.**	**4/15/15**	**The violation was corrected at the time of the inspection. Veolia has agreed to a reduced penalty of $3,375. Issue is resolved.**
VES - Fremont	**California**	**County of Sonoma, District Attorney**	**Letter of Intent**	**9/22/14**	**While providing waste management services, Veolia caused the release of 1 gallon of a hazardous material at a customer's site to a storm drain.**	**4/6/15**	**Settlement agreement reached with the courts. Veolia agreed to pay a civil penalty of $17,000 as well as $9,000 in restitution to support local environmental and safety programs.**
VES - Port Arthur	**Texas**	**Texas Commission on Environmental Quality**	**Alleged Violations**	**10/1/14**	**Alleged RCRA violations related to documentation of inspections, maintenance of related records, and failure to maintain a curent NOR.**	**2/9/15**	**Veolia submitted a written response to the TCEQ on 10/22/14. Received TCEQ documentation on 2/9/15 that no further action is required.**
VES - Menomonee Falls	**Wisconsin**	**Wisconsin Department of Natural Resources**	**Notice of Violation**	**11/10/14**	**Facility placed treated wastes in a landfill without demonstration that the waste meets applicable LDR treatment standards and shipped the waste without a uniform hazardous waste manifest.**	**12/13/14**	**Veolia identified the error and self-reported it to the WDNR. A conference with the Department was held on 11/10/14. No further action required.**
VES - Azusa	**California**	**Department of Toxic Substances Control**	**Notice of Violation**	**11/14/14**	**During a DTSC inspection the following compliance issues were noted pertaining to the management of used oil - documention of manifest discrepancies, marking of storage tanks, completion of refresher training, and an unresolved permit condition.**	**3/30/15**	**Veolia has submitted a written response to the agency. Issues addressed, No further action required at this time.**
VES - Flanders	**New Jersey**	**New York City Business Integrity Commission**	**Notice of Violation**	**11/18/14**	**The annual financial statement required by the Integrity Commission was submitted by Veolia four days after the due date.**	**2/6/15**	**Veolia submitted the financial report as required. Settlement and penalty in the amount of $500 was agreed to by Veolia. Issue is resolved.**

VES - Azusa	**California**	**Los Angeles Regional Water Quality Control Board**	**Notice of Violation**	**12/29/14**	**Veolia failed to submit an annual report associated with the general stormwater discharge permit.**	**4/2/15**	**Annual report was submitted as required.**
VES - Port Arthur	**Texas**	**Texas Commission on Environmental Quality**	**Notice of Violation**	**1/6/15**	**Failure to operate incinerator in compliance with the CO emission limits for the time period April - August 2014.**	**6/24/15**	**Veolia has submitted a written response including the corrective actions taken. Letter from TCEQ stating no further action required.**
VES - Port Arthur	**Texas**	**Texas Commission on Environmental Quality**	**Notice of Violation**	**1/16/15**	**Drinking water inspection noted deficiencies in plant operations recordkeeping, inspections, and notification of system changes.**	**12/30/15**	**Response submitted by Veolia to the TCEQ NOV on 5/29/15 and on 11/3/15. Response received from the TCEQ and no further action required.**
VES - West Carrollton	**Ohio**	**Ohio Environmental Protection Agency**	**Notice of Violation**	**3/23/15**	**During an inspection one container was observed without an accumulation start date and proper hazardous waste marking.**	**3/27/15**	**Container marking was corrected at the time of the inspection. No further action required. OEPA acknowledges return to compliance.**
VES - Puerto Rico	**Puerto Rico**	**Environmental Quality Board**	**Notice of Violation**	**4/9/15**	**The 10-day intransit facility held waste in excess of the maximum 10-days while in transportation.**	**5/1/15**	**Veolia identified the error and self-reported it to the EQB. Penalty of $3,000 paid.**
VES - Port Arthur	**Texas**	**Texas Commission on Environmental Quality**	**Notice of Violation**	**4/22/15**	**Alleged violations for TPDES compliance including failure to sample outfall in compliance with Water Quality Discharge Permit, failure to properly calculate the daily average for E coli and failure to correctly report effluent data on the DMR.**	**6/10/15**	**Response submitted by Veolia to the TCEQ and response received from the TCEQ that no further action required.**
VES - Azusa	**California**	**Department of Toxic Substances Control**	**Notice of Violation**	**6/4/15**	**During an inspection the DTSC noted that the facility was not properly storing hazardous waste in relation to its solvent reclamation process. The DTSC contends that the intermediate product from the reclamation requires storage as a hazardous wastes.**	**Pending**	**Veolia submitted a written response to the DTSC to clarify that the intermediate material is a product.**
VES - Henderson	**Colorado**	**Colorado Dept of Public Healt and Environment**	**Notice of Violation**	**9/9/15**	**Based on on a September 2015 inspection, the Division identified issues related to incompatible waste storage, weathered/illegible container labels, and cracks in secondary containment areas.**	**2/11/16**	**Veolia implemented corrective actions and agreed to a settlement amount of $7,742.**
VES - Menomonee Falls	**Wisconsin**	**USEPA Region 5**	**Notice of Violation**	**10/6/15**	**Based on an August 2014 inspection, EPA alleges non-compliance with the following: accumulation of hazardous wastes following treatment, marking containers with the accumulation start date, and performing scheduled daily inspections.**	**Pending**	**Veolia submitted a written response to the agency to contest the referenced violations.**

VES - West Carrollton	Ohio	USEPA Region 5	Notice of Violation	10/9/15	Based on an April 15, 2015 inspection, EPA alleges non compliance with the following: location of storage of hazardous waste, submittal of manifest copies to the state agency, allowable vapor pressure on tanks, and waste exporter reporting.	Pending	Veolia submitted a written response to the agency to contest the referenced violations.
VES - Middlesex	New Jersey	USEPA Region 2	Notice of Violation	10/23/15	Based on a July 2015 inspection, EPA alleges non compliance with the following: air emission monitoring of pumps, improper container closure, contingency plan updates, and financial assurance updates.	8/11/16	Corrective actions completed. Veolia submitted a written response to the agency to contest some of the referenced violations. Penalty paid of $36,600.
VES - Middlesex	New Jersey	New Jersey Department of Environmental Protection	Notice of Violation	2/12/16	NJDEP inspection noted a tank wagon that was staged temporarily outside of the permitted storage area.	6/30/16	Veolia completed correcting actions. Penalty paid of $12,000.
VES - Wantagh	New York	New York Department of Environmental Compliance	Notice of Violation	2/12/16	NYDEC inspection on 1/27/16 noted issues related to the secondary containment for 10-day operations and the transfer of solid wastes within the 5-day timeframe.	Pending	Veolia submitted a written response to the agency to contest the referenced violations.
VES - Tallahassee	Florida	USEPA Region 4	Notice of Violation	4/11/16	USEPA inspection completed 12/17/15 noted violations related to universal waste container management standards, personnel training and acquisition of signed manifests.	6/13/16	Veolia completed correcting actions. Penalty paid of $8,700.
VES - Menomonee Falls	Wisconsin	USEPA Region 5	Notice of Violation	5/25/16	A review of the 2010-2102 exporter annual reports and associated manifests noted manifest errors and several underreported waste volumes.	Pending	Veolia submitted a written response to the agency on 6/13/16 to contest the referenced violations as there are no manifest errors and the noted waste volumes were not underreported.
VES - Port Arthur	Texas	Texas Commission on Environmental Quality	Notice of Violation	4/27/16	Agency alleges failure to operate incinerator in compliance with the parameters specified in the permit including, the minimum combustion temperature, excessive CO emissions, excessive metals emissions. Also failure to prevent visible tank emissions and complete leak repairs.	Pending	Veolia submitted a written response to the TCEQ on 6/3/16.
VES - Port Arthur	Texas	Texas Commission on Environmental Quality	Notice of Violation	7/26/16	Alleged violations related to documentation of tank inspections, documentation of emergency response equipment, and posting of security signs.	Pending	Veolia is preparing a written response to submit to the TCEQ.

Veolia ES Technical Solutions, L.L.C. 10-year Environmental Compliance History

Entity Name	Entity State	Enforcing Entity	Type of Action	Date of Initial Pleading	Allegation	Disposition Date	Disposition
Onyx - Port Arthur	Texas	Texas Natural Resources Conservation Commission	Alleged Violations	08/04/00	During a wastewater inspection there were several alleged violations noted, including (1) failure to provide a suitable staff guage at one outfall, (2) failure to maintain the interior coatings of a domestic WWTP, and (3) failure to properly calculate effluent flow.	09/01/00	Written response submitted to the TNRCC. No further action and no penalty paid.
Onyx - Morrow	Georgia	Georgia Department of Natural Resources, Environmental Protection Division	Notice of Violation	09/05/00	During the 7/18/00 inspection, it was noted that a container of crushed lamps was not being managed in compliance with the satellite accumulation requirements and there was an unlabeled drip pan containing waste from drained hoses.	09/29/00	Response letter sent to GA EPD notifying that corrections have been made. No further action. No penalty paid.
Onyx - Sauget	Illinois	Illinois Environmental Protection Agency	Notice of Violation	09/29/00	1) Failure to control fugitive emissions on July 2, 2000 and July 3, 2000 at Unit #4 incinerator and on July 6 at Unit #3 incinerator.	11/8/05	Resolved in conjunction with the 11/8/05 Consent Order described above (see 11/24/99 NOV listing).
Onyx - Azusa	California	Superior Court of California, Long Beach	Misdemeanor complaint	10/06/00	Waste management violation of Section 25189.6(a) of the California Health and Safety Code.	04/30/01	Matter dismissed.
Onyx - Port Arthur	Texas	Texas Natural Resources Conservation Commission	Alleged Violations	11/02/00	During a water quality assessment there were deficiencies noted including the failure to conduct quarterly chronic biomonitoring as required.	12/04/00	Written response submitted to the TNRCC. No further action and no penalty paid.
Onyx - Flanders	New Jersey	New Jersey Department of Environmental Protection Northern Bureau of Water Compliance and Enforcement	Administrative Order	01/26/01	Failure to monitor, report and notify NJDEP within 24 hours the results for five routine Microbiological samples during July 2000.	05/15/01	Settlement agreement entered. UV filtration unit installed and civil penalty of $625.00 paid.
Onyx - Morrow	Georgia	Georgia Department of Natural Resources, Environmental Protection Division	Notice of Violation	02/09/01	During the 1/4/01 inspection, it was noted that a 5-gallon container of hazardous waste was not properly closed and another container was not properly labeled.	03/15/01	Response letter sent to GA EPD notifying that corrections have been made. No further action. No penalty paid.
Onyx - Phoenix	Arizona	United States Environmental Protection Agency Region IX	Inspection report	03/12/01	Potential violations:1) Improper storage of hazardous waste at the 10-day storage areas 2) training records not current.	Closed	Matter resolved. Deficiencies corrected.

Onyx - Azusa	California	People of the State of California --- Superior Court of the State of California for the County of Los Angeles	Felony Complaint	04/05/01	1) Failure to report a release or threatened release of hazardous material 2) mishandling, transporting, disposing or storing waste in a manner causing unreasonable risk 3) negligent emission of air contaminant	10/24/01	Onyx plead guilty to a single misdemeanor count of failure to report release or threatened release of hazardous material. Onyx paid a fine of $1,850 and assessments of $3,150.
Onyx - Phoenix	Arizona	United States Environmental Protection Agency	Warning Letter	04/27/01	Facility was requested to provide a description of its procedure for ensuring hazardous waste is not stored on-site for longer than the allowed time.	07/25/01	Violation was immediately addressed. Onyx Environmental Services returned to compliance with the regulations cited in the report.
Onyx - Azusa	California	Superior Court of California, Long Beach	Civil litigation	04/30/01	Waste management violation of Section 25189.6(a) of the California Health and Safety Code.	Closed	Onyx to pay $30,000 to the Long Beach/Los Angeles County Natural Resources Trust and $9,700 to the City of Long Beach, Department of Health and Human Services.
Onyx - Azusa	California	Department of Toxic Substances Control	Notice of Violation	05/31/01	During a May 2001 inspection the agency noted alleged violations for incompatible waste storage, cracks in secondary containment, and accumulation date marking on containers.	Closed	Deficiencies corrected by facility. Penalty paid.
Onyx - Phoenix	Arizona	State of Missouri Department of Natural Resources	Notice of Violation	07/27/01	Failure to submit yearly generator hazardous waste summary reports.	08/15/01	Yearly generator hazardous waste summary report was submitted to the Missouri Department of Natural Resources.
Onyx - Port Arthur	Texas	Texas Natural Resources Conservation Commission	Deficiencies noted	08/09/01	During a drinking water inspection deficiencies were noted including (1)lack of a flow measuring device to measure treated water used to backwash filters, (2) excessive corrosion on part of the clarifier, and (3) incomplete documentation in the Monitoring Plan.	02/08/02	OES corrected deficiencies and received final approval letter from agency. No penalty paid.
Onyx - Port Arthur	Texas	Texas Natural Resources Conservation Commission	Deficiencies noted	08/28/01	Excessive corrosion on the guages of a gas calibration cylinder, deficient fit test results for one employee, improper discrepancy resolution on a manifest, improper shipping paper description, and improper classification of waste.	09/01/01	Deficiencies resolved. No penalty paid.
Onyx - Livonia	Michigan	State of Michigan, Department of Environmental Quality	Warning Letter	08/30/01	1) Facility does not have a complete registration or permit issued in accordance with the Hazardous Materials Transportation Act 2) failure to use approved manifest forms 3) box trucks need to be labeled with current city and state 4) facility stores used oil without proper permit.	11/16/01	Permit obtained and matter settled. Consent Order entered and terminated on 8/21/02. Penalty paid of $9,000.

Onyx - Phoenix	Arizona	United States Environmental Protection Agency, Region IX	Notice of Noncompliance	09/21/01	Failure to submit Certificates of Disposal to Arizona Public Service Co. documenting the disposal of PCBs.	11/07/01	Letter received from EPA stating "no further action" will be taken.
Onyx - Port Arthur	Texas	Texas Natural Resources Conservation Commission	Notice of Violation	09/21/01	Failure to submit certain Subpart DD reports to the agency in a timely manner.	11/21/01	Deficiencies resolved. No penalty paid.
Onyx - Flanders	New Jersey	State of New Jersey Department of Environmental Protection	Notice of civil administrative penalty assessment	11/26/01	New Jersey Department Environmental Protection alleges OES failed to prepare a manifest correctly, label a hazardous waste package properly and failed to accurately disclose a haz-waste shipment.	03/10/03	Agency seeks $45,000.00 civil penalty. Settlement conference held with NJDEP on 1/15/03. Agreement to reduce penalty to $23,000 reached.
Onyx - West Carrollton	Ohio	Ohio Environmental Protection Agency	Notice of Violation	11/30/01	During an inspection it was noted that 1) 55 gallon drum had a hole in the side 2) lid to drum not closing properly 3) inspection documentation not filled out 4) container not marked with the words "hazardous waste".	12/14/01	Onyx corrected all violations at the time of the inspection. Matter resolved.
Onyx - Morrow	Georgia	Georgia Department of Natural Resources, Environmental Protection Division	Notice of Violation	12/05/01	During the 7/12/01 inspection the following deficiencies were noted: (1) improper container label, (2) leaking containers, (3) incomplete inspection log, (4) discarded PPE not placed in a container, (5) incompatible wastes stored in same bay, (6) improper container storage, and (7) accumulated liquids in sumps.	01/21/02	Response letter sent to GA EPD notifying that corrections have been made. No further action required.
Onyx - Flanders	New Jersey	United States Environmental Protection Agency, Region 2	Warning Letter	12/14/01	At the time of the inspection, Onyx did not record actual dates of repairs/remedial actions in the inspection log.	01/11/02	No further action required. Inspection report modified and EPA notified in writing. No penalty.
Onyx - Sauget	Illinois	Illinois Environmental Protection Agency	Notice of Violation	12/31/01	Fire occurred in the specialty feed unit of incinerator #2.	11/8/05	Resolved in conjunction with the 11/8/05 Consent Order described above (see 11/24/99 NOV listing).
Onyx - Sauget	Illinois	Illinois Environmental Protection Agency	Notice of Violation	03/29/02	Visible emissions and surge vent opening in incinerator #4.	11/8/05	Resolved in conjunction with the 11/8/05 Consent Order described above (see 11/24/99 NOV listing).

Onyx - West Carrollton	Ohio	Ohio Environmental Protection Agency	Notice of Violation	04/15/02	Onyx self-reported the following violations regarding an off-site shipment of waste: 1) Transported or caused transported hazardous waste to a facility in another state not operating under a license or permit issued under RCRA 2) Failure to prepare hazardous waste manifest transported off-site.	10/30/02	Corrective measures completed. Settlement reached for these self-reported violations and the OEPA findings from the 04/30/02 inspection noted below. Civil penalty of $14,600 paid. Matter resolved.
Onyx - Port Arthur	Texas	Texas Natural Resource Conservation Commission	Notice of Violation	04/19/02	During an agency inspection several deficiencies were noted including failure to prevent a discharge of hydrocarbons in the parking lot, failure to properly document a satellite accumulation area, inadequate maintenance of equipment, and improper operation of the bulk feed building's pollution control equipment.	08/26/03	Submitted supplemental information to agency on 3/1/02 and response to NOV on 5/15/02. On 8/26/03 settlement was reached for $17,600. Matter resolved.
Onyx - Richmond	California	Department of Toxic Substances Control	Notice of Violation	04/22/02	During a April 2002 inspection several minor violations were alleged relating to inspection log documentation, training records, surety bond beneficiary, and closure cost adjustment.	04/24/03	All deficiencies were corrected and a Compliance Action Submittal sent by Onyx to the Agency. Final inspection from the agency indicated that no further action required.
Onyx - Menomonee Falls	Wisconsin	United States Environmental Protection Agency Region 5	Administrative Complaint	04/29/02	Complaint alleges that Onyx failed to immediately notify the NRC of a release from a cargo tanker that occurred on 07/02/01 in Illinois during transportation.	08/02/02	Settlement reached. Onyx paid fine of $9,282.
Onyx - West Carrollton	Ohio	Ohio Environmental Protection Agency	Notice of Violation	04/30/02	During an inspection it was noted that 1) there was residual waste on the outside of a drum, 2) a drum was not properly closed or labeled 3) satellite accumulation timeframes exceeded, 4) and failure to maintain adequate aisle space.	06/17/02	All deficiencies corrected either at the time of the inspection or prior to the agencies return to compliance inspection on 6/7/02. Settlement reached in conjunction with the 04/15/02 self-reported violations noted above.
Onyx - Port Arthur	Texas	Texas Natural Resource Conservation Commission	Alleged Violations	06/10/02	Drinking water inspection noted that the sand filters and clearwell were exhibiting signs of corrosion.	1/23/2003	Deficiencies corrected. No penalty paid.
Onyx - Azusa	California	Department of Toxic Substances Control	Notice of Violation	06/26/02	During a June 2002 inspection the agency noted alleged violations for insufficient "no smoking" signs in flammable storage area, tank leakage, and waste sampling deficiencies.	Closed	Deficiencies corrected by facility. No further action required.

Onyx - Menomonee Falls	Wisconsin	Illinois Environmental Protection Agency	Administrative Enforcement	08/02/02	In relation to a cargo tank spill on 7/2/01, agency alleges that Onyx released a liquid acid waste creating vapors in the air, and used an inappropriate type of tanker.	09/20/04	Settlement reached and Onyx paid civil penalty of $80,000.
Onyx - West Carrollton	Ohio	New York State Department of Environmental Conservation	Notice of Violation	09/11/02	New York State DEC alleged that the West Carrollton facility failed to keep 2 copies of a hazardous waste manifest and distribute them in accordance with New York State regulations.	10/30/02	Civil penalty of $1000 paid. Matter resolved.
Onyx - Azusa	California	South Coast Air Quality Management District	Notice of Violation	01/28/03	Violation for nuissance odors based on complaints.	Closed	Penalty of $7,500 paid.
Onyx - Azusa	California	State of California - California Environmental Protection Agency	Violations and compliance actions	02/05/03	List of Violations: 1. Stored hazardous wastes at an unauthorized area. 2. Failure to record the quantity and location of each waste received; 3. Failure to obtain all analysis information before accepting the wastes; 4. Incomplete inspection log.	Closed	Action taken to correct violations.
Onyx - West Carrollton	Ohio	Ohio Environmental Protection Agency	Notice of Violation	03/18/03	During an agency inspection it was noted that (1) there was a satellite accumulation container not properly closed, and (2) a hazardous waste container not properly dated and labeled.	04/01/03	Onyx corrected all deficiencies and responded to the agency on 4/1/03. Matter resolved.
Onyx - Flanders	New Jersey	State of New Jersey Department of Environmental Protection	Notice of Violation	06/05/03	Failure to obtain the date of acceptance on a manifest.	06/05/03	Deficiency corrected during inspection. Matter closed.
Onyx - Port Arthur	Texas	Texas Commission on Environmental Quality	Alleged Violations	06/19/03	Agency wastewater inspection noted several deficiencies: 1) failure to provide effluent sample analysis with proper resolution, 2) excessive solids on the surface of the clarifier, 3) failure to discharge effluent in compliance with permit limitations.	Closed	Deficiencies corrected. Response to alleged violations submitted to agency on 7/3/03, 6/28/04, and 2/2/05.
Onyx - Port Arthur	Texas	Texas Commission on Environmental Quality	Alleged Violations	07/25/03	Agency drinking water inspection noted several deficiencies: 1) the exterior coatings of the sand filters and clearwell were corroded, 2) flow measuring device not properly calibrated, 3) failure to verify the accuracy of the manual disinfectant residual analyzer.	11/13/03	Deficiencies corrected. Response to alleged violations submitted to agency. Received letter from TCEQ stating no further response is required.

Onyx - West Carrollton	Ohio	Ohio Environmental Protection Agency	Notice of Violation	07/31/03	During an agency inspection it was noted that (1) a satellite accumulation container was not properly dated or labeled.	08/18/03	Onyx corrected all deficiencies and responded to the agency on 8/18/03. Matter resolved.
Onyx - Creedmoor	North Carolina	State of North Carolina, Hazardous waste section	Notice of Violation	08/12/03	1)Incompatible wastes stored together improperly, and 2) a container not clearly marked to identify its contents and the date of each period of accumulation.	09/04/03	Corrective actions completed. No penalty.
Onyx - Morrow	Georgia	Georgia Department of Natural Resources, Environmental Protection Division	Notice of Violation	10/24/03	During a 6/17/03 inspection several deficiencies were noted: (1) failure to accurately record the location of a drum in storage, (2) inadequate coating on the containment floor, (3) exceeding stacking height for containers, (4) Subpart BB equipment marking and recordkeeping, and (5) improper marking on a container of universal waste.	Closed	Response letter sent to GA EPD on 11/25/03. No further action required.
Onyx - Richmond	California	Department of Toxic Substances Control	Notice of Violation	11/24/03	Annual inspection of the facility noted one violation for insufficinet aisle space in the oxidizer storage area.	Closed	Deficiencies corrected by facility. No further action required.
Onyx - Port Arthur	Texas	Texas Commission on Environmental Quality	Alleged Violations	03/11/04	Agency wastewater inspection noted several deficiencies: 1) failure to discharge a compliant effluent for aluminum,and 2) failure to follow analytical procedures for oil and grease analysis.	05/01/06	Submitted response letter to the agency on 8/9/04. Letter from TCEQ received 5/1/06 indicating corrective actions are complete.
Onyx - Port Arthur	Texas	Texas Commission on Environmental Quality	Alleged Violations	04/01/04	Agency drinking water inspection noted several deficiencies including: 1) improper calibration during pH and turbidity sample analysis, 2) failure to provide water with a pH greater than 7, 3) failure to verify the accuracy of the manual disinfectant residual, 4) failure to provide/maintain equipment, 5) failure to label some water lines.	09/14/04	All items other than 1 and 2 were resolved during the inspection. Other items have been addressed. No further action required.
Onyx - West Carrollton	Ohio	Ohio Environmental Protection Agency	Notice of Violation	05/06/04	Agency inspection noted the the following deficiencies: (1) Two containers were not properly closed, dated and labeled, and (2) there was accumulated precipitation in the secondary containment system > 24 hours after a rain event.	06/02/04	Onyx corrected all deficiencies on the same day of the inspection. No further action required.

Onyx - Azusa	California	Department of Toxic Substances Control	Notice to Comply	06/15/04	Minor violations noted during an inspection include, 1. Failure to mark container with start accumulation date, and 2. Alternate emergency coordinator information not current in Contingency Plan.	Closed	Deficiencies corrected by facility. No further action required.
Onyx - Port Arthur	Texas	Texas Commission on Environmental Quality	Notice of Enforcement	08/26/04	Agency Title V inspection on 7/16/04 noted the following alleged violations: 1)failure to maintain emission rate for CO below emission limit, 2) failure to maintain certain record for an emergency generator, 3) failure to notify the regional office of several reportable emission events at the incinerator, 4) failure to maintain an emission rate for HCl below the emission limit.	7/6/05	Submitted a response to the agency on 10/29/04. Received Notice of Enforcement Action for Settlement on 11/1/04. $12,768 penalty paid and $12,768 supplemental environmental project completed.
Onyx - West Carrollton	Ohio	Ohio Environmental Protection Agency	Notice of Violation	09/25/04	Based on agency inspection on 9/28/04, the OEPA cited the the following violations: 1) a drum label was improper due to it being faded and unreadable, 2) four drums of waste were stored on a broken pallet in an unsafe manner.	10/25/04	Onyx corrected all deficiencies at the time of the inspection. No further action required.
Onyx - Port Arthur	Texas	Texas Commission on Environmental Quality	Notice of Enforcement	02/14/05	With regards to a waste shipment to a third-party facility, Onyx was cited for the failure to properly dispose hazardous waste at an authorized facility.	7/7/05	Civil penalty of $2,560 paid and a $2,560 supplemental environmental project completed.
Onyx - West Carrollton	Ohio	Ohio Environmental Protection Agency	Notice of Violation	04/27/05	Agency inspection noted 2 improperly labeled satellite accumulation containers.	05/16/05	Onyx corrected deficiency at the time of the inspection. No further action required.
Onyx - Morrow	Georgia	Georgia Department of Natural Resources, Environmental Protection Division	Notice of Violation	06/22/05	During the 4/5/05 inspection the following was noted: (1) improper marking of palletized consumer commodities, (2) one employee did not receive annual RCRA training.	6/22/05	Response letter sent to GA EPD on 7/25/05. Issue resolved. No penalty.
Onyx - Phoenix	Arizona	Arizona Department of Environmental Quality	Notice of Violation	06/28/05	Failure to submit manifest copies to agency.	04/01/00	Manifest copies submitted to DEQ at time of inspection. Matter resolved. No penalty paid.

Onyx - Port Arthur	Texas	Texas Commission on Environmental Quality	Alleged Violations	07/22/05	Title V inspection noted failure to submit annual permit compliance certification as required, failure to comply with operating permit conditions, and failure to report all instances of all deviations.	01/4/06	Onyx submitted written response on 10/17/05 and the agency has responded that all necessary corrective actions have been met. No further action required.
Onyx - West Carrollton	Ohio	Ohio Environmental Protection Agency	Notice of Violation	09/22/05	Based on agency inspection on 9/22/05, the OEPA cited the the following violations: 1) a container of waste was not properly closed, 2) the accumulation date was not marked on several containers, 3) several drums were stored in an area which is not a designated storage area for that type specific type of waste, 4) aisle space was not adequate in a container storage area, 5) there was accumulated precipitation in the secondary containment system > 24 hours after a rain event, and 6) a tank containing rain water was found to be leaking.	11/22/05	All deficiencies were corrected promptly. Agency indicated that Onyx has returned to compliance. No further action by the agency is expected.
Onyx - Morrow	Georgia	Georgia Department of Natural Resources, Environmental Protection Division	Notice of Violation	09/28/05	During the 9/13/05 inspection the improper marking of a pallet of consumer products was noted.	9/28/05	Deficiency corrected. No penalty paid.
Onyx - Tallahassee	Florida	Florida Department of Environmental Protection	Notice of Violation	10/13/05	Onyx provided a self-report to the Florida DEP upon discovery of the storage of packaged mercury-containing materials at an off-site transportation yard not in compliance with the Onyx Tallahassee facility storage permit.	08/02/06	Onyx implemented corrective actions including securing proper recycling/ treatment for the materials in storage and developing new waste management and recordkeeping procedures. Settlement reached with the FLDEP and Onyx paid civil penalty of $40,950 plus $1,500 cost reimbursement for violating permit conditions and FL Statutes.

Onyx - Flanders	New Jersey	United States Environmental Protection Agency, Region 2	Civil Administrative Action	11/28/05	EPA alleges that Onyx on three separate occassions shipped wastes containing PCBs off-site for disposal without properly identifying the PCBs on the manifest.	04/25/06	At the time of the shipments Onyx was not aware that the wastes contained PCBs. Onyx contends that in each case upon discovery of the presence of PCBs at the disposal facility, Onyx promptly submitted Unmanifested Waste Reports to EPA and redirected the wastes to a TSCA facility for appropriate disposal. Settlement reached. Penalty reduced to $2,100 with a SEP for an additional $7,875.
Onyx - West Carrollton	Ohio	Ohio Environmental Protection Agency	Notice of Violation	03/24/06	The annual Hazardous Waste report was not submitted by March 1, 2006. The final corrections to the report were submitted on July 24, 2006	09/05/06	The final corrections to the annual report were submitted on July 24, 2006. VES-TS received a return to compliance letter on September 5, 2006.
Onyx - West Carrollton	Ohio	Ohio Environmental Protection Agency	Notice of Violation	03/31/06	Self-reported exceedance of the 10-day intransit timeframe for a container that became separated from the remainder of the shipment, Agency citation issued for compliance with the manifest requirements as a transporter	Closed	Response letter has been sent to the agency on 6/28/06 agreeing with item 1 and disputing item 2. No further action from agency as of 2/14/07.
Onyx - Phoenix	Arizona	Arizona Department of Environmental Quality	Notice of Violation	04/26/06	Agency inspection noted universal waste container not properly closed, damaged asphalt adjacent to drywell, and barbed wire fence in need of repair.	06/01/06	All deficiences corrected. No further action required.

Onyx - West Carrollton	Ohio	Ohio Environmental Protection Agency	Notice of Violation	04/27/06	Inspection conducted on April 27, 2006 noted two deficiencies. 1) The shrink wrap on a pallet of mixed containers was torn. 2) An outbound trailer was outside of containment awaiting the transporter.	06/28/06	All deficiencies were corrected promptly. Agency indicated that VES-TS has returned to compliance. No further action by the agency is expected.
Onyx - Port Arthur	Texas	Texas Commission on Environmental Quality	Notice of Enforcement	04/27/06	Agency inspection on 2/13/06 noted a container in poor condition, and failure to obtain from the TCEQ authorization to store, process, and dispose of radioactive waste.	8/10/09	Received Notice of Enforcement on 8/1/06 for the storage and treatment of prohibited radioactive waste. Onyx then submitted a revised penalty calculation to the TCEQ reclassifying the potential harm to "minor". Resolution payment of a $7,777 penalty and the completion of a supplemental environmental project for $7,777.
Onyx - Menomonee Falls	Wisconsin	United States Environmental Protection Agency Region 5	Notice of Violation	05/10/06	Agency facility inspection on 01/11/06 noted several deficiencies including: (1) failure to mark a container with the accumulation start date and identification of its contents, and (2) failure to mark containers as "hazardous waste".	10/04/06	Onyx submitted a written response on 6/7/06. The container from a which label fell off was labeled correctly on 1/11/06
Onyx - Azusa	California	Department of Toxic Substances Control	Notice of Violation	05/23/06	During a February 2006 inspection the agency noted alleged violations for failure to properly conduct tank inspections/ assessments, failure to follow proper loading/ unloading requirements, and failure to record the quantity and location of each waste stored.	12/11/06	Consent order signed and penalty of $14,792.00 paid for (1) improper storage of wastes longer than 10 days after wastes were loaded onto a vehicle and (2) failure to record the location of each waste at the facility. The other allegations were dismissed.
Onyx - Tallahassee	Florida	Florida Department of Environmental Protection	Notice of Violation	08/02/06	FLDEP inspection of the Tallahassee transportation yard on May 4, 2006 identified exceedances of the 10-day intransit timeframe for waste shipments.	10/11/06	Onyx responded in writing to the agency's concerns on 05/17/06 and implemented corrective measures accordingly. Settlement reached with FLDEP and Onyx paid a civil penalty of $2,500.
VES -West Carrollton	Ohio	Ohio Environmental Protection Agency	Notice of Violation	08/29/06	Inspection conducted on August 29, 2006 noted two deficiencies. 1) Two containers were missing the storage date. 2) Two containers of used oil were missing the wording "Used Oil". 3) VES-TS self-reported to the agency on September 6, 2006 that a container exceed the one year storage time limit.	09/22/06	All deficiencies were promptly corrected during the inspection. The container exceeding the one year storage limit was shipped on-site on September 6, 2006. The agency indicated in the facility has returned to compliance. No further action by the agency is expected.
VES - Sauget	Illinois	United States Environmental Protection Agency - Region V	Finding of Violation / Notice of Violation	09/27/06	Alleged violation of CAA, RCRA and State SIP program. Five identified issues specifically deal with LDAR monitoring, Subpart BB, Subpart EEE and Subpart TT (IL SIP regulations).	Pending	Veolia met with the USEPA, Region V and IEPA on October 23, 2006 for an informal meeting to discuss these issues. Additional information was requested and will be provided to USEPA. Veolia's position is that the facility did not violate any of the referenced alleged violations.

VES - Henderson	Colorado	United States Environmental Protection Agency	Alleged Violations	09/29/06	Failure to submit a compliant Annual RCRA Hazardous Waste Exporter Report with USEPA in 2003 and 2004, and failure to file a manifest exception report for two shipments in 2003.	12/05/06	Deficiencies corrected by VES. Civil penalty totaling $2,450 paid.
VES - Port Arthur	Texas	United States Environmental Protection Agency - Region 6	Finding of Violation	12/18/06	VES submitted a self-disclosure notification to EPA regarding the failure to timely complete the closed vent system and control device certification for the regenerative thermal oxidizer that was placed in service in 2004.	12/18/06	The control device certification was submitted by VES 2/23/06. No further action required by VES. No penalty.
VES - West Carrollton	Ohio	Ohio Environmental Protection Agency	Notice of Violation	03/01/07	Upon review of the 2006 Hazardous Waste Annual Report submitted by VES, the OEPA noted some data errors regarding customer incorrect EPA identification numbers and incorrect management method codes for the treatment of on-ste residuals.	04/04/07	VES corrected the errors in the report and the OEPA issued a return to compliance letter on 4/4/07. There was no fine and no further action necessary.
VES - Port Arthur	Texas	Texas Commission on Environmental Quality	Notice of Enforcement	04/23/07	Title V inspection noted failure to complete container inspections as required.	10/15/07	VES submitted written response to the TCEQ on 8/2/07. Received letter from TCEQ stating no further action required. No penalty.
VES - Port Arthur	Texas	Texas Commission on Environmental Quality	Notice of Enforcement	04/26/07	Title V inspection noted documented deviations when kiln temperature dropped below permit condition, failure to submit semi-annual NESHAP report in a timely manner (it was 3 days late).	9/17/07	VES submitted written response to the TCEQ on 6/6/07. Received letter from TCEQ stating no further action required. No penalty.
VES - Tallahassee	Florida	Department of Environmental Protection	Warning Letter	05/16/07	residual contaminant level in aluminum derived from lamps in excess of permit required limit for one week in 2007 due to data entry error.	8/28/2007	Implemented additional data quality verification procedures. Penalty of $4,300.
VES - Flanders	New Jersey	New Jersey Department of Environmental Protection	Notice of Violation	06/27/07	Failure to determine if a solid waste is hazardous and provide a properly completed manifest and LDR. The waste in question was shipped by VES as a non-hazardous waste to a hazardous waste disposal facility. Upon receipt at the disposal facility the waste was determined to be a hazardous waste, D002, based on its pH.	01/15/08	Upon discovery of the waste discrepancy, VES corrected the manifest and issued a discrepany letter to the original generator. Settlement agreement reached with NJDEP. A reduced civil penalty of $3,750 paid.

VES - Port Arthur	Texas	U.S. Department of Justice - Bureau of Alcohol, Tobacco and Firearms	Report of Violations	07/11/07	Failure to Store all explosives in a magazine, failure to maintain a daily summary of magazine transactions, failure to record manufacturer's mark	11/7/07	Deficiencies corrected. BATF has stated it will take no further action, provided VES does not repeat these violations.
VES - Middlesex	New Jersey	United States Environmental Protection Agency - Region 2	Notice of Violation	09/05/07	Marisol's lab had 2 containers of hazardous waste not properly closed, and records were not maintained of annual inspections of tank openings in accordance with subpart CC requirements.	10/4/07	Facility responded in writing on 10/4/07; no further response from the agency.
VES - Port Arthur	Texas	Texas Commission on Environmental Quality	Notice of Violation	11/15/07	TCEQ inspection of TPDES program noted data collection deficiency.	12/11/07	VES completed corrective actions on 12/11/07.
VES - Port Arthur	Texas	Texas Commission on Environmental Quality	Notice of Violation	11/20/07	TCEQ air inspection on 9/25/07 noted a deficiency for inadequate documentation of alarm searches for continuous ambient hydrocarbon monitors.	2/27/08	VES submitted written response to the TCEQ on 1/2/08. Received letter from TCEQ stating no further action required. No penalty.
VES - Port Arthur	Texas	Texas Commission on Environmental Quality	Notice of Enforcement	12/20/07	TCEQ solid waste inspection noted deficiencies related to the classification and incineration of misfired gas generators. Also a container was missing an accumulation start date and haz waste label and a rolloff was noted to be leaking.	7/9/09	VES submitted additional information to the TCEQ on 11/15/07. Received notice of enforcement for settlement purposes on 3/5/08. Agreed Order has been signed and a Letter of Final Compliance has been received.
VES - Port Arthur	Texas	Texas Commission on Environmental Quality	Notice of Enforcement	01/10/08	TCEQ review of the TPDES discharge monitoring reports noted exceedances for the effluent in 2006 and 2007.	7/21/09	VES submitted payment of $3,660 for a Supplemental Environmental Project. Certification of Compliance submitted on 7/21/09.
VES - Port Arthur	Texas	Texas Commission on Environmental Quality	Notice of Violation	01/29/08	TCEQ air quality inspection on 1/7/08 noted failure to maintain CO emissions below 100 ppm, failure to maintain adequate kiln temperature, and failure to report a deviation in the period it occurred.	6/10/08	Response to NOV submitted on 4/4/08. Received letter from TCEQ stating no further action required. No penalty.

VES - Port Arthur	Texas	Texas Commission on Environmental Quality	Notice of Violation	02/20/08	TCEQ RCRA inspection on 12/18/07 noted failure to properly document remediation of a spill, failure to place inspectors full name on certain inspection records, and failure to prevent stack CO average exceedances on several dates.	3/21/08	VES submitted written response to the TCEQ on 3/21/08.
VES - Tallahassee	Florida	Department of Environmental Protection	Notice of Violation	04/02/08	Failure to monitor emissions from HID machine between carbon filters and failure to properly record emission monitoring results from retort room ventillation system.	8/28/2007	Installed sampling ports on HID processing equipment and began monitoring at new sampling points. Trained personnel conducting air sampling on recordkeeping. Penalty of $2,250.
VES -West Carrollton	Ohio	Ohio Environmental Protection Agency	Notice of Violation	04/17/08	Inspection conducted on April 17, 2008 noted that universal waste lamps were being accumulated without noting an accumulation start date.	05/23/08	All deficiencies were corrected and the lamps promptly disposed. No further action required and the agency noted the facility has returned to compliance.
VES - Sauget	Illinois	United States Environmental Protection Agency - Region V	Finding of Violation	06/12/08	Mercury emission exceedances and use of an unapproved metals extrpolation method.	Pending	Veolia met with the USEPA, Region 5 on July 29, 2008 to discuss these issues. Agency could not provide any details on the dates of exceedances and according to the regulations an approval of the extrapolation method is required "if warranted". Veolia retested the incinerators for mercury in August and September, 2008 and passed the mercury emissions standard.
VES - Sauget	Illinois	Illinois Environmental Protection Agency	Notice of Violation	07/23/08	Closure cost estimate not adjusted for inflation annually as required.	9/8/09	A written response to the agency was submitted on 9/8/08. The current closure cost estimate and funding for the facility already is in excess of actual closure cost. Class 1 modification was submitted at the Agency's request for the lower closure cost estimate. Agency notified Veolia that no further action was required at this time. No penalty paid.
VES - Port Arthur	Texas	United States Environmetal Protection Agency	Complaint and Consent Agreement and Final Order	12/16/08	Reporting errors for PCBs identified in the 2006 TRI report.	1/6/09	Submitted payment of $11,735. No further action required.
VES - Flanders	New Jersey	New Jersey Department of Environmental Protection	Notice of Violation	03/06/09	Failure to update the DPCC/DCR plan with new employee contact information.	3/12/09	Deficiency correct and no further action required. No penalty.

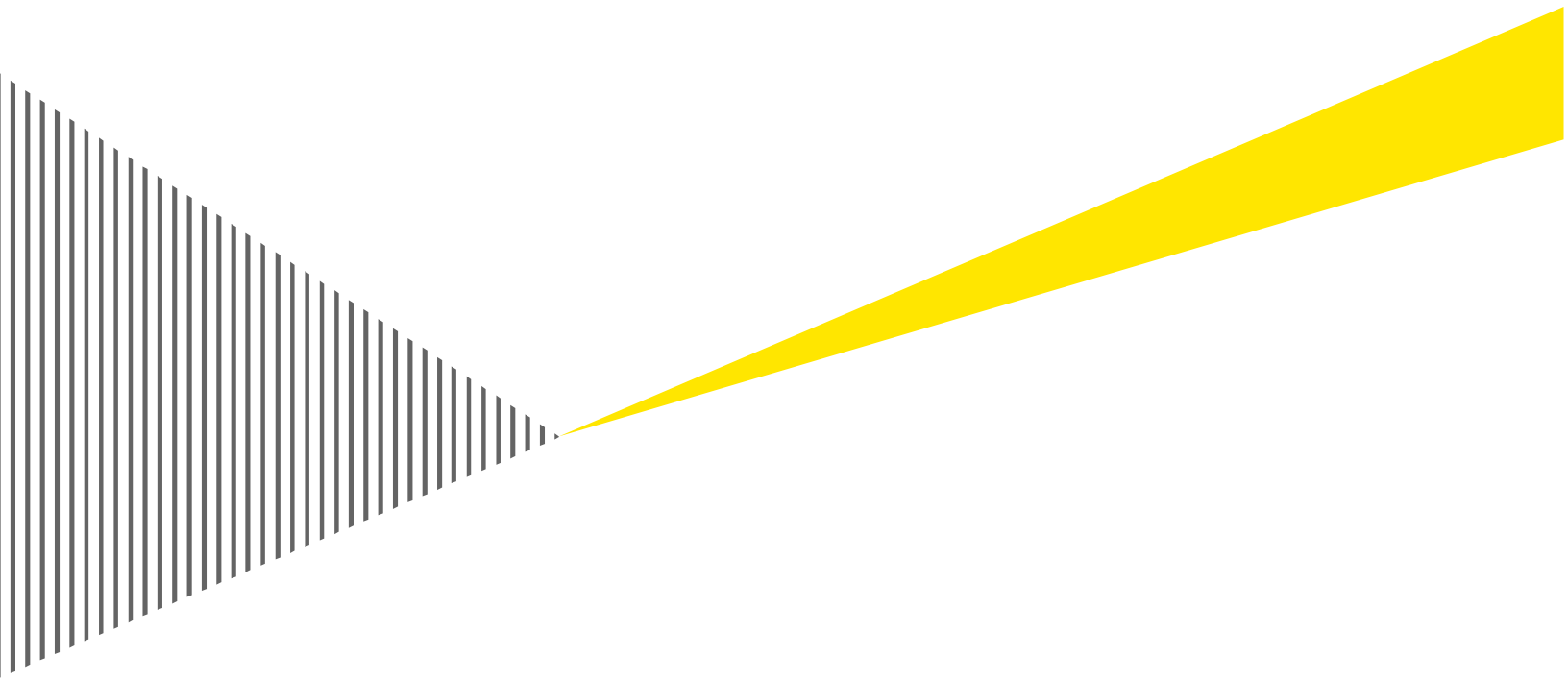
VES - West Carrollton	Ohio	Ohio Environmental Protection Agency	Notice of Violation	03/10/09	Inspection conducted on March 10, 2009 noted two containers that were not marked with the date of accumulation. Container markings were corrected at the time of the inspection.	03/31/09	All deficiencies were promptly corrected. No further action required and the agency noted the facility has returned to compliance.
VES - Middlesex	New Jersey	New Jersey Department of Environmental Protection	Notice of Violation	03/26/09	Failure to maintain tank testing documentation. Tanks were tested the documentation at the time of inspection was inadequate.	03/27/09	All deficiencies were promptly corrected. No further action required and no penalty.
VES - Port Arthur	Texas	Texas Department of State Health Services	Notice of Violation	05/19/09	Failure to provide notification of demolition of asbestos-containing building.	5/20/09	Required notice and check for $2,000 submitted to the Department. A request to excuse violation and remit payment was submitted on 6/8/09.
VES - Port Arthur	Texas	Texas Commission on Environmental Quality	Notice of Violation	05/29/09	Mechanical integrity testing required a 5-year temperature survey to be completed. Survey was to be completed by March 31, 2008 but was not run until May 7, 2009.	5/7/09	Received NOV on 5/29/09. Violation is resolved.
VES - Flanders	New Jersey	United States Environmental Protection Agency - Region 2	Civil Administrative Action	08/03/09	EPA alleges that Veolia shipped wastes containing PCBs off-site for disposal without properly identifying the PCBs on the manifest.	12/9/09	At the time of the shipment Veolia was not aware that the waste contained PCBs. Upon discovery of the presence of PCBs through testing at the disposal facility (Veolia - Middlesex, NJ), Veolia, as required by regulation, promptly submitted Unmanifested Waste Reports to EPA and redirected the wastes to a TSCA facility for appropriate disposal. Settlement agreed to for $19,720.
VES - Flanders	New Jersey	New Jersey Department of Environmental Protection	Notice of Violation	08/04/09	Failure to properly segregate incompatible containers of hazardous waste.	11/18/09	Upon discovery of the waste storage issue, the containers of incompatible wastes were properly segregated. Penalty of $3,600.
VES - Creedmoor	North Carolina	NC Department of Environment and Natural Resources	Notice of Violation	09/10/09	Failure to conduct analytical and qualitative monitoring of stormwater discharge outfalls for a specified period.	Pending	Veolia submitted written response identifying corrective and preventative measures to the agency on 10/9/09. Additional stormwater monitoring completed by Veolia.

VES - Medina	Ohio	Ohio Environmental Protection Agency	Notice of Violation	09/16/09	During an inspection it was noted that all containers of used oil were not marked with the words "used oil".	9/22/09	All deficiencies were corrected during the audit. No further action required by Veolia. No penalty assessed.
VES - Morrow	Georgia	Georgia Department of Natural Resources, Environmental Protection Division	Notice of Violation	12/09/09	During an inspection on 6/18/09 it was noted that (1) some small containers stacked on a pallet were not secured as required by the permit, (2) one container had a lid cracked and was therefore determined to be "open", and (3) two containers were observed hanging off the edge of a pallet in a potentially unsafe manner.	1/27/10	Response submitted by Veolia to the agency. All deficiencies were corrected at the time of the inspection. State confirms that no further action required.
VES - Phoenix	Arizona	Arizona Department of Environmental Quality	Notice of Violation	11/17/09	During an inspection on 5/26/09 there were several items noted as deficiencies involving the training program, sampling procedures, use of secondary containment and aisle space in the hazardous waste storage area, management of containers, recordkeeping and reporting, waste analysis plan, and off-site disposal of wastes.	Pending	Veolia's response has been submitted to the agency and is awaiting a response.
VES -Middlesex	New Jersey	New Jersey Department of Environmental Protection	Notice of Violation	03/19/09	Agency inspection on 3/19/09 noted that documentation of initial static head test was not maintained for new storage tanks.	Pending	All deficiencies have been corrected and the NJDEP has proposed settlement of $250.00.
VES - Flanders	New Jersey	New Jersey Department of Environmental Protection	Notice of Violation	04/08/10	An agency inspection on 3/30/10 noted a container with poor integrity (concaved).	06/16/10	Upon discovery of the waste container issue, the containers was properly overpacked. Penalty paid - $4,500.
VES - Menomonee Falls	Wisconsin	Wisconsin Department of Natural Resources	Notice of Violation	06/08/10	Facility received wastes improperly classified by the generator as non-hazardous and proceeded to treat the waste in a unit not licensed for treatment of hazardous waste.	07/16/10	Letter recevied from WDNR stating no further action will be taken and that Veolia has adequately addressed the non-compliance.

Attachment R5

CONSOLIDATED FINANCIAL STATEMENTS

Veolia ES Technical Solutions, L.L.C.
Years Ended December 31, 2015 and 2014
With Report of Independent Auditors



Veolia ES Technical Solutions, L.L.C.

Consolidated Financial Statements

Years Ended December 31, 2015 and 2014

Contents

Ernst & Young LLP
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Report of Independent Auditors

The Board of Managers and Member
Veolia ES Technical Solutions, L.L.C.

We have audited the accompanying consolidated financial statements of Veolia ES Technical Solutions, L.L.C., which comprise the consolidated balance sheets as of December 31, 2015 and 2014, and the related consolidated statements of income, changes in member's equity, and cash flows for the years then ended, and the related notes to the consolidated financial statements.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in conformity with U.S. generally accepted accounting principles; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free of material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Building a better working world

Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the consolidated financial position of Veolia ES Technical Solutions, L.L.C. at December 31, 2015 and 2014, and the consolidated results of its operations and its cash flows for the years then ended in conformity with U.S. generally accepted accounting principles.

Ernst & Young LLP

July 14, 2016

Veolia ES Technical Solutions, L.L.C.

Consolidated Balance Sheets
(In Thousands)

	December 31	
	2015	**2014**
Assets		
Current assets:		
Cash and cash equivalents	**$ 807**	$ 12
Accounts receivable, net of allowance for doubtful accounts of $1,313 and $968 in 2015 and 2014, respectively	**77,531**	65,581
Inventories	**7,791**	8,167
Deferred income taxes	**–**	14,690
Prepaid expenses and other current assets	**1,060**	1,201
Total current assets	**87,189**	89,651
Property and equipment, net	**126,955**	125,657
Intangible assets, net	**2,166**	1,132
Goodwill	**55,680**	55,680
Restricted funds	**–**	164
Other assets	**2,801**	2,492
Total assets	**$ 274,791**	$ 274,776
Liabilities and member's equity		
Current liabilities:		
Accounts payable	**$ 46,771**	$ 34,837
Accrued payroll and related expenses	**16,793**	16,447
Deferred revenue	**18,963**	18,873
Other accrued expenses	**34,490**	35,302
Total current liabilities	**117,017**	105,459
Debt payable to third parties	**20,560**	20,560
Environmental liabilities	**543**	510
Facility site closure obligations	**11,649**	9,697
Deferred tax liabilities	**15,428**	30,352
Total liabilities	**165,197**	166,578
Member's equity:		
Paid-in capital	**29,732**	29,732
Retained earnings	**227,453**	190,076
Due from affiliate	**(147,591)**	(111,610)
Total member's equity	**109,594**	108,198
Total liabilities and member's equity	**$ 274,791**	$ 274,776

See accompanying notes.

Veolia ES Technical Solutions, L.L.C.

Consolidated Statements of Income
(In Thousands)

	Year Ended December 31	
	2015	**2014**
Revenues	**$ 514,302**	$ 491,521
Expenses:		
Cost of operations	**388,122**	375,414
Selling, general, and administrative expenses	**35,357**	33,821
Depreciation and amortization	**16,226**	16,353
Gain on insurance settlements	**–**	(417)
Total expenses	**439,705**	425,171
Income from operations	**74,597**	66,350
Other expense:		
Interest income, net	**(1,525)**	(1,901)
Other, net	**16,643**	16,420
Income before income taxes	**59,479**	51,831
Provision for income taxes	**22,102**	19,398
Net income	**$ 37,377**	$ 32,433

See accompanying notes.

Veolia ES Technical Solutions, L.L.C.

Consolidated Statements of Changes in Member's Equity
(In Thousands)

	Additional Paid-In Capital	Retained Earnings	Due from Affiliate	Total Equity
Balance at January 1, 2014	$ 29,732	$ 157,643	$ (69,835)	$ 117,540
Net income	–	32,433	–	32,433
Change in due from affiliate	–	–	(41,775)	(41,775)
Balance at December 31, 2014	29,732	190,076	(111,610)	108,198
Net income	**–**	**37,377**	**–**	**37,377**
Change in due from affiliate	**–**	**–**	**(35,981)**	**(35,981)**
Balance at December 31, 2015	**$ 29,732**	**$ 227,453**	**$ (147,591)**	**$ 109,594**

See accompanying notes.

Veolia ES Technical Solutions, L.L.C.

Consolidated Statements of Cash Flows
(In Thousands)

	Year Ended December 31	
	2015	**2014**
Operating activities		
Net income	**$ 37,377**	$ 32,433
Adjustments to reconcile net income to net cash provided by operating activities:		
Depreciation and amortization	**16,226**	16,353
Accretion expense	**112**	103
Deferred income taxes	**(234)**	1,659
Gain on sale of property and equipment	**(22)**	(111)
Changes in operating assets and liabilities:		
Accounts receivable	**(11,950)**	6,869
Inventories	**376**	(440)
Prepaid expenses and other current assets	**141**	(135)
Accounts payable, accrued payroll and related expenses	**12,280**	1,735
Deferred revenue	**90**	1,461
Other accrued expenses	**(812)**	(1,742)
Environmental liabilities	**33**	3
Other	**(310)**	(2,013)
Net cash provided by operating activities	**53,307**	56,175
Investing activities		
Purchases of property and equipment	**(15,121)**	(14,903)
Proceeds from sale of property and equipment	**122**	201
Payments to acquire operating permits and other intangible assets	**(1,696)**	–
Decrease in restricted funds	**164**	2
Net cash used in investing activities	**(16,531)**	(14,700)
Financing activities		
Excess cash paid to affiliate, net of borrowings	**(35,981)**	(41,775)
Net cash used in financing activities	**(35,981)**	(41,775)
Net increase (decrease) in cash and cash equivalents	**795**	(300)
Cash and cash equivalents at beginning of year	**12**	312
Cash and cash equivalents at end of year	**$ 807**	$ 12

See accompanying notes.

Veolia ES Technical Solutions, L.L.C.

Notes to Consolidated Financial Statements
(In Thousands)

December 31, 2015

1. Organization and Basis of Presentation

Veolia ES Technical Solutions, L.L.C. (VES-TS or the Company) is a wholly owned subsidiary of Veolia Environmental Services North America LLC (VESNA), which is an indirect wholly owned subsidiary of Veolia Environnement S.A. (VE). VE is publicly traded on the Paris Stock Exchange. VESNA is the sole member of VES-TS, and its liability is limited to its capital contributions.

The Company is a waste management services business providing collection, handling, transportation, treatment, and disposal of hazardous waste to commercial, industrial, municipal, and residential customers throughout the United States and Puerto Rico. The Company operates two hazardous waste incinerators, located in Texas and Illinois. The Company also has certain recycling operations, which are not material.

The accompanying consolidated financial statements include the accounts of the Company and its subsidiaries. All significant intercompany transactions and balances have been eliminated in consolidation. Certain prior year amounts, including the cost and accumulated amortization of internal-use software, have been reclassified from property and equipment to intangible assets, in order to conform to the current year presentation on the accompanying consolidated balance sheets.

2. Significant Accounting Policies

Cash and Cash Equivalents

The Company considers all short-term investments with maturities of three months or less when purchased to be cash equivalents.

Restricted Funds

Restricted funds represent funds in a trust account to provide financial assurance to certain federal and state regulatory agencies, which govern the Resource Conservation and Recovery Act and the Toxic Substance Control Act in the case of closure of the Company's facilities. These funds consisted primarily of money market funds. Financial assurance is generally required under the terms of permits issued by the state regulatory agencies.

2. Significant Accounting Policies (continued)

Inventories

Inventories consist of critical spare parts for incinerators and supplies. Inventories are stated at the lower of cost or net realizable value, with cost being determined on a first-in, first-out basis for approximately 41% of inventories at December 31, 2015 and approximately 34% reported at December 31, 2014, while the remaining inventories are determined on an average-cost basis.

Property and Equipment

Property and equipment are stated at cost. Depreciation for financial reporting purposes is provided using the straight-line method over the estimated useful lives of the respective assets. Vehicles and equipment are depreciated over their useful lives ranging from 3 to 20 years. Buildings are depreciated over their useful lives ranging from 10 to 30 years. Leasehold improvements are depreciated over the lesser of the life of the asset or the remaining term of the lease.

Costs incurred during maintenance turnarounds at the Company's hazardous waste incinerators are expensed as incurred, unless they extend the life of an asset or are determined to be a betterment.

Goodwill and Other Intangible Assets

Goodwill, permits, and other intangible assets are stated at cost.

Goodwill is not amortized but is subject to an annual impairment test. The Company performs its annual goodwill test for impairment in its fourth fiscal quarter and, in 2015 and 2014, concluded that an impairment charge was not required.

Amortizable intangible assets consist primarily of operating permits, customer lists, non-compete agreements, and internal-use software. Operating permits consist of the value of permits acquired in a business combination and direct costs related to obtaining permits such as legal fees, engineering costs, and other direct expenses paid to third parties. Operating permits are amortized over periods ranging from five to seven years on a straight-line basis. Intangible assets such as customer lists and non-compete agreements are generally amortized over periods of ten and five years, respectively. Internal-use software is amortized over periods generally ranging from three to seven years.

2. Significant Accounting Policies (continued)

Impairment of Long-Lived Assets

Property and equipment, and amortizable intangible assets are reviewed for impairment whenever events or changes in circumstances indicate that the carrying amount may not be recoverable. If the sum of expected undiscounted cash flows is less than the carrying value of the related asset or group of assets, a loss is recognized for the difference between the fair value and the carrying value of the asset or group of assets. The Company concluded that an impairment charge was not required in 2015 and 2014.

Environmental Remediation Costs

Liabilities for loss contingencies, including on-site environmental remediation costs arising from claims, assessments, litigation, fines and penalties, and other sources, are recorded when it is probable that a liability has been incurred and the amount of the liability can be reasonably estimated. Amounts recorded are not discounted. Recoveries from third parties, which are probable of realization, are separately recorded and are not offset against the related environmental liability, in accordance with Accounting Standards Codification (ASC) 410, *Asset Retirement and Environmental Obligations.*

Facility Site Closure

The Company has material financial obligations relating to closure and post-closure costs or remediation of the facilities and incinerators it operates, or for which it is or may become responsible. In the United States, the final closure and post-closure requirements are established under the standards of the Environmental Protection Agency, and these rules are implemented and applied on a state-by-state basis. Estimates for final closure and post-closure costs are developed using input from the Company's engineers and accountants and are reviewed by management. These estimates involve projections of costs that will be incurred after the facilities or incinerators cease operations and during the legally required post-closure monitoring period.

The Company inflates estimated final costs to the expected time of payment and discounts the expected future costs back to present value. An inflation rate of 1.96% and a credit-adjusted, risk-free discount rate of 6.5% were used to determine the present value of the future facility site closure and post-closure costs. The discount rate, established upon adoption of accounting guidance now codified in ASC 410, was based on the risk-free interest rate on obligations of

2. Significant Accounting Policies (continued)

similar maturity, adjusted for VE's credit rating. Interest accretion on facility site closure and post-closure liabilities is recorded using the effective-interest method and is included in the cost of operations on the consolidated statements of income.

The Company does not believe that it is possible to develop a methodology to reliably estimate a market risk premium and has, therefore, excluded any such market risk premium from the determination of expected cash flows for facility site closure and long-term care obligations.

The changes to the facility site closure obligations on the accompanying consolidated balance sheets for the years ended December 31, 2015 and 2014, were as follows:

Balance at January 1, 2014	$	10,109
Revision in estimated cash flows		1,130
Facility site closure spending		(1,645)
Accretion expense		103
Balance at December 31, 2014		9,697
Revision in estimated cash flows		**1,840**
Accretion expense		**112**
Balance at December 31, 2015	**$**	**11,649**

Financial Assurance Bonds

In the normal course of business, the Company generally elects to satisfy its financial assurance obligations through standby letters of credit or the issuance of performance bonds. The Company pays annual premiums to obtain performance bonds underwritten by insurance carriers. These premiums are amortized over the life of the bonds when material. At December 31, 2015 and 2014, the Company had letters of credit of $25,700 and $25,458, respectively, providing financial assurance for closure and post-closure costs and $11,122 and $11,095, respectively, for other operational letters of credits. The Company also has a letter of credit of $20,878 relating to Industrial Development Bonds at the Port Arthur incinerator (see Note 7). At December 31, 2015 and 2014, the Company had $9,309 and $7,837, respectively, of closure and post-closure bonds, and $5,914 and $4,251, respectively, for performance and other bonds.

2. Significant Accounting Policies (continued)

Fair Value of Financial Instruments

The Company's financial instruments consist primarily of accounts receivable, restricted funds held in trust, accounts payable, debt instruments, and amounts due to and from affiliates. None of the Company's debt instruments (or amounts due to affiliates) that are outstanding at December 31, 2015, has readily ascertainable market values and it is not practical to estimate the fair value of these amounts. See Notes 6 and 7 for the terms and carrying values of the Company's various debt instruments. The carrying values of the other financial instruments are considered to be representative of their respective fair values.

Revenue Recognition

The Company earns revenue principally by providing waste management services, consisting of the collection, handling, transportation, treatment, and disposal of hazardous waste. Revenues related to the collection, handling, transportation, and treatment of waste are recorded at the time contracted services are performed. Revenues related to the disposal of waste are recorded when the waste is disposed of internally or transported to a third-party disposal facility. Certain customers are billed in advance and, accordingly, recognition of the related revenues is deferred until the services are provided.

The Company grants credit to the majority of its customers. It is not the policy of the Company to require collateral from its customers in order to provide credit. Potential loss amounts associated with the granting of credit are included in management's estimate of the allowance for doubtful accounts. On a periodic basis, the Company evaluates its accounts receivable and establishes the allowance for doubtful accounts based on a combination of specific customer circumstances and credit conditions, as well as the Company's history of write-offs and collections. The Company's policy is generally to not charge interest on trade receivables after an invoice becomes past due. A receivable is considered past due if payments have not been received by the due date listed on the invoice terms. Write-offs are recorded against the allowance for doubtful accounts when all reasonable efforts for collection have been exhausted.

2. Significant Accounting Policies (continued)

Sale of Receivables

Pursuant to a non-recourse factoring program between VE and an unaffiliated third party financial institution, the Company transfers certain eligible trade accounts receivable in their entirety, satisfying all of the conditions established under ASC Topic 860, *Transfers and Servicing,* to account for the transfer of the financial assets as a sale. The fair value of assets received as proceeds in exchange for the transfer of trade accounts receivable under the non-recourse factoring program approximate the fair value of such receivables. During 2015 and 2014, the Company transferred trade accounts receivable (after an 8.5% deferred purchase price rate) of approximately $14.0 million and $15.0 million, respectively, under the non-recourse factoring program. In addition, the Company recognized losses of approximately $0.3 million and $0.1 million during 2015 and 2014, respectively, representing the discount, or the difference between cash proceeds received and the recorded value at which these trade receivables were sold to the financial institution under the factoring program.

Shipping and Handling Costs

Shipping and handling costs incurred in providing waste management services are included in the cost of operations.

Income Taxes

The Company is not subject directly to federal income taxes as a limited liability company. The operations of the Company and certain affiliates are included in the consolidated U.S. federal income tax return of Veolia North America, Inc. (VNA), a subsidiary of VE. Taxes payable to VNA are included with other accrued expenses on the consolidated balance sheets (see Note 5) and are calculated as if the Company was a stand-alone taxpayer (see Note 8). Actual federal taxes paid are determined at the VNA consolidated level.

Deferred tax assets and liabilities are recognized for the future tax consequences attributable to differences between the financial statement carrying amounts and the tax bases of existing assets and liabilities.

2. Significant Accounting Policies (continued)

Income Taxes (continued)

The Company recognizes a tax benefit for positions taken on a tax return when such positions are considered more likely than not to be sustained based solely on the technical merits of each tax position. Although the Company believes that the positions taken on previously filed tax returns are appropriate, it nevertheless has established tax, penalties, and interest reserves when appropriate through the income tax provision for tax positions that do not meet the recognition threshold based on an evaluation of all available evidence. The tax uncertainties are reviewed as circumstances warrant and adjusted as events occur that affect the Company's estimated liability for additional taxes, such as lapsing of applicable statutes of limitations, conclusion of tax audits, additional exposure based on current calculations, identification of new issues, issuance of administrative guidance, or rendering of a court decision affecting a particular tax issue.

Consolidated Statements of Cash Flows

Supplemental disclosures of cash flow information are as follows:

	Year Ended December 31	
	2015	**2014**
Interest paid, including payments to affiliates	**$ 31**	$ 38
Income taxes paid, including payments to affiliates	**27,308**	18,039

Use of Estimates

The preparation of financial statements in conformity with generally accepted accounting principles (GAAP) requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities, disclosures of contingent assets and liabilities at the date of the financial statements, and the reported amounts of revenues and expenses during the reporting periods. Although management believes that the Company's estimates and assumptions are reasonable, they are based upon information presently available. Actual results may differ significantly from the estimates.

2. Significant Accounting Policies (continued)

New Accounting Pronouncements

From time to time, new accounting pronouncements are issued by the Financial Accounting Standards Board (FASB) or other standard-setting bodies that the Company adopts as of the specified effective dates. Unless otherwise discussed below, the Company believes the impact of any recently issued standards that are not yet effective are either not applicable to the Company at this time or will not have a material impact on the financial statements upon adoption.

In May 2014, the FASB issued ASU 2014-09, *Revenue from Contracts with Customers (Topic 606)*, which supersedes the revenue recognition requirements in Accounting Standards Codification ("ASC") 605, *Revenue Recognition*. The core principle of the guidance is that an entity should recognize revenue to depict the transfer of promised goods or services to customers in an amount that reflects the consideration to which the entity expects to be entitled in exchange for those goods or services. The ASU also requires additional disclosure about the nature, amount, timing and uncertainty of revenue and cash flows arising from customer contracts, including significant judgments and changes in judgments and assets recognized from costs incurred to obtain or fulfill a contract. In August 2015, the FASB issued ASU 2015-14, *Revenue from Contracts with Customers (Topic 606): Deferral of the Effective Date* as a revision to ASU 2014-09, which revised the effective date to fiscal years beginning after December 15, 2018. Early adoption is permitted but not prior to periods beginning after December 15, 2016. The guidance is to be applied using one of two retrospective application methods. The Company is currently evaluating the impact of adopting this guidance on its internal processes, operating results and financial reporting. The impact is currently not known or reasonably estimable.

In August 2014, the FASB issued ASU 2014-15, *Disclosure of Uncertainties about an Entity's Ability to Continue as a Going Concern*. This guidance requires an entity's management to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the entity's ability to continue as a going concern within one year after the date that the financial statements are available to be issued. When management identifies conditions or events that raise substantial doubt about an entity's ability to continue as a going concern, management should consider whether its plans that are intended to mitigate those relevant conditions or events that will alleviate the substantial doubt are adequately disclosed in the footnotes to the financial statements. This guidance will be effective for the annual period ending after December 15, 2016, and for annual periods thereafter. Early adoption is permitted. The Company believes this guidance will not have a material impact on its financial statements.

2. Significant Accounting Policies (continued)

New Accounting Pronouncements (continued)

In April 2015, the FASB issued ASU 2015-03, *Interest-Imputation of Interest (Simplifying the Presentation of Debt Issuance Costs) (Subtopic 835-30)*. The core principle of the guidance is that debt issuance costs related to a recognized debt liability will no longer be presented as an asset, but rather be presented in the balance sheet as a direct deduction from the carrying amount of that debt liability, consistent with debt discounts. The recognition and measurement guidance for debt issuance costs is not affected by the ASU. In August 2015, the FASB issued ASU 2015-15, *Interest—Imputation of Interest (Subtopic 835-30): Presentation and Subsequent Measurement of Debt Issuance Costs Associated with Line-of-Credit Arrangements—Amendments to SEC Paragraphs Pursuant to Staff Announcement at June 18, 2015 EITF Meeting* as a supplement to ASU 2015-03, which provided clarification to the presentation of debt issuance costs related to line-of-credit arrangements. The ASU permits an entity to defer and present debt issuance costs related to line-of-credit arrangements as an asset and subsequently amortize the deferred issuance costs over the term of the line-of-credit arrangement. This guidance is effective and will be applied retrospectively for fiscal years beginning after December 15, 2015. Early adoption is permitted. The Company believes this guidance will not have a material impact on its financial statements.

In July 2015, the FASB issued ASU 2015-11, *Simplifying the Measurement of Inventory (Topic 330)*. The core principle of the guidance is that an entity should measure inventory at the "lower of cost and net realizable value" and options that currently exist for "market value" will be eliminated. The ASU defines net realizable value as the "estimated selling prices in the ordinary course of business, less reasonably predictable cost of completion, disposal, and transportation." This guidance is effective for fiscal years beginning after December 15, 2016. Early adoption is permitted. The Company believes this guidance will not have a material impact on its financial statements.

2. Significant Accounting Policies (continued)

New Accounting Pronouncements (continued)

In November 2015, the FASB issued ASU 2015-17, *Income Taxes (Topic 740): Balance Sheet Classification of Deferred Taxes*. The core principle of the guidance is that the ASU requires all deferred tax assets and liabilities to be classified as noncurrent on the balance sheet instead of separating deferred taxes into current and noncurrent amounts. In addition, valuation allowances are no longer required to be allocated between current and noncurrent deferred tax assets as they will also be classified as noncurrent. The ASU does not impact the requirement to offset deferred tax asset and deferred tax liabilities for each taxpaying component within a jurisdiction. This guidance is effective for fiscal years beginning after December 15, 2016. Early adoption is permitted and the Company elected to adopt the ASU on a prospective basis as of December 31, 2015. Prior periods were not retrospectively adjusted. Other than the revised balance sheet presentation of deferred tax assets and liabilities, the adoption of the ASU did not have an effect on the Company's consolidated financial statements.

In February 2016, the FASB issued ASU 2016-02, *Leases (Topic 842)*, which supersedes the lease recognition requirements in ASC Topic 840, *Leases*. The core principal of the guidance is that an entity should recognize assets and liabilities arising from a lease for both financing and operating leases, along with additional qualitative and quantitative disclosures. The standard will be effective for fiscal years beginning after December 15, 2018. Early adoption is permitted. The guidance is to be applied using a modified retrospective transition method with the option to elect a package of practical expedients. The Company is currently evaluating the impact of the adoption of this accounting standard update on its internal processes, operating results and financial reporting. The impact is currently not known or reasonably estimable.

Management does not believe that any other recently issued, but not yet effective, accounting pronouncements, if adopted, would have a material impact on its condensed combined financial statements or disclosures.

Subsequent Events

In connection with the preparation of these financial statements, the Company evaluated subsequent events through July 14, 2016, the date these financial statements were available to be issued. There were no subsequent events required to be recognized or disclosed in these financial statements.

3. Property and Equipment

Property and equipment consist of the following:

	December 31	
	2015	**2014**
Land and land improvements	**$ 25,265**	$ 24,661
Vehicles and equipment	**187,944**	176,527
Buildings and leasehold improvements	**88,020**	86,494
Construction-in-progress	**9,044**	11,530
	310,273	299,212
Less accumulated depreciation	**183,318**	173,555
	$ 126,955	$ 125,657

Total depreciation expense was $15,564 and $15,805 during 2015 and 2014, respectively.

4. Intangible Assets

The following tables present details of the Company's amortizable intangible assets:

	December 31, 2015		
	Gross	**Accumulated Amortization**	**Net**
Operating permits	**$ 4,153**	**$ 2,458**	**$ 1,695**
Non-compete agreements	**2,500**	**2,176**	**324**
Internal-use software	**4,814**	**4,667**	**147**
	$ 11,467	**$ 9,301**	**$ 2,166**

	December 31, 2014		
	Gross	**Accumulated Amortization**	**Net**
Operating permits	$ 2,744	$ 2,338	$ 406
Non-compete agreements	2,500	1,932	568
Internal-use software	4,769	4,611	158
	$ 10,013	$ 8,881	$ 1,132

Total amortization expense recorded was $662 and $548 in 2015 and 2014, respectively, related to these identifiable intangible assets. The estimated future amortization expense of purchased intangible assets for the five years succeeding December 31, 2015, and thereafter, are as follows: 2016 – $763, 2017 – $287, 2018 - $179, 2019 - $174, 2020 - $172, and thereafter - $591.

5. Other Accrued Expenses

Other accrued expenses consist of the following:

	December 31 2015	2014
Transportation and disposal	**$ 20,079**	$ 18,806
State income and other taxes	**2,308**	2,645
Income taxes (receivable from) payable to VNA	**(220)**	4,416
Accrued insurance claims	**2,548**	2,259
Other	**9,775**	7,176
	$ 34,490	$ 35,302

6. Transactions With Affiliates

Amounts due (from) to affiliates are as follows:

	December 31 2015	2014
Receivable from VESNA	**$ (147,591)**	$ (111,610)
Income taxes (receivable from) payable to VNA	**(220)**	4,416
	$ (147,811)	$ (107,194)

The receivable due from VESNA represent net amounts for cash sweeps relating to a shared cash management arrangement, interest income, liabilities for insurance coverage, and other amounts paid by VESNA on behalf of the Company. At December 31, 2015 and 2014, the net amounts due from VESNA have been classified as a reduction to member's equity because these amounts are not represented by note receivable agreements and there is no present intention by VESNA to repay these amounts to the Company.

Income taxes (receivable from) payable to VNA, included in other accrued expenses on the consolidated balance sheets, relate to income taxes that are determined under a tax-sharing agreement between the Company and VNA.

6. Transactions With Affiliates (continued)

Interest income and fees paid to affiliates were as follows:

	Year Ended December 31	
	2015	**2014**
Interest income (included in interest income, net)	**$ (1,546)**	$ (1,926)
VNA management and royalty fee (included in other, net)	**15,372**	15,372

Interest income is related to amounts due from VNA. Interest amounts due from VNA is accrued and generally settled monthly at rates that averaged 1.64% in both 2015 and 2014.

VNA provides the Company with various financing, tax, information technology, legal and other administrative services for which the Company was charged associated direct costs and an allocation of certain centrally incurred costs. It is the policy of VNA to allocate centrally incurred costs primarily on the basis of usage, estimated time spend or based on budgeted revenue. In the opinion of management, these allocations and charges have been made on a reasonable basis; however, they are not necessarily indicative of the level of expenses which might have been incurred had the Company been operating as a separate stand-alone entity.

Insurance

The Company, through arrangements with VNA, has insurance coverage for workers' compensation and motor vehicle liabilities in excess of certain occurrence deductibles. Provisions are recorded each period for incidents and claims below the occurrence deductibles and represent management's best estimate of the ultimate settlement of the developed claims, including claims incurred but not reported. These accrued insurance claims represent the obligations of the Company and are recorded in other accrued expenses on the accompanying consolidated balance sheets. VNA purchases insurance coverage on behalf of the Company. To the extent the insurance purchased by VNA provides coverage for claims in excess of certain occurrence deductibles that are higher than the arrangements between the Company and VNA, the additional liability is paid by VNA on behalf of the Company and is not reflected as a liability in the accompanying consolidated financial statements. The Company also has arrangements through VNA for insurance coverage for employee medical benefits in excess of certain occurrence deductibles. Provisions are recorded each period for incidents and claims below the occurrence deductible and represent management's best estimate of the ultimate settlement of developed claims, including claims incurred but not reported.

7. Debt Payable to Third Parties

Debt payable to third parties consists of the following:

	December 31 2015	2014
Industrial development bonds	**$ 20,560**	$ 20,560

In May 2003, the Company issued $20,600 of industrial development bonds through the Lower Neches Valley Authority. The bonds were issued to finance the Material Processing/MACT construction project at the Company's incineration facility located in Port Arthur, Texas. The bonds have a maturity date of May 2028 and accrue interest at a variable rate calculated on a weekly basis. The average monthly interest rate was 0.11% and 0.12% for the years ended December 31, 2015 and 2014, respectively. Interest expense was $23 and $25 during 2015 and 2014, respectively. The bonds are supported by a $20,878 letter of credit and are guaranteed by VESNA. Bond proceeds were issued to the Company based on supported project costs.

Under the agreement, the Company is subject to various nonfinancial covenants, and at December 31, 2015, the Company was in compliance with all debt covenants.

8. Income Taxes

Current and deferred taxes have been presented by the Company on a stand-alone basis. The amounts due to or due from VNA for income taxes are determined based on a tax-sharing arrangement between the Company and VNA. The provision for income taxes consists of the following:

	Year Ended December 31	
	2015	**2014**
Current:		
Federal	**$ 20,634**	$ 15,623
State	**1,701**	2,116
	22,335	17,739
Deferred:		
Federal	**(213)**	1,913
State	**(20)**	(254)
	(233)	1,659
	$ 22,102	$ 19,398

The differences in the provisions for income taxes and the amounts determined by applying the federal statutory rate of 35% for both 2015 and 2014 to income before income taxes are as follows:

	Year Ended December 31	
	2015	**2014**
Tax at statutory rate	**$ 20,818**	$ 18,077
State income taxes, net of federal benefit	**1,085**	1,122
Other, net	**199**	199
	$ 22,102	$ 19,398

8. Income Taxes (continued)

The deferred income tax balances consist of the following:

	December 31	
	2015	**2014**
Deferred tax liabilities:		
Property and equipment	**$ 18,009**	$ 17,578
Intangible assets	**17,290**	16,672
Other	**117**	213
Total deferred tax liabilities	**35,416**	34,463
Deferred tax assets:		
Vacation and other employee benefits	**4,344**	4,570
Allowance for doubtful accounts	**504**	343
Deferred revenue	**7,282**	7,249
Facility site closure obligation	**4,939**	3,916
Other expenses not currently deductible	**2,919**	2,723
Total deferred tax assets	**19,988**	18,801
Net deferred tax liabilities	**$ 15,428**	$ 15,662

At December 31, 2015, management believes all of the deferred tax assets will be fully realizable.

9. Employee Benefit Plans

The Company has a defined contribution 401(k) savings plan that covers substantially all nonunion employees meeting certain minimum eligibility requirements. Participating employees can elect to defer a portion of their compensation and contribute to the plan on a pretax basis. The Company also matches certain amounts, as defined in the plan document. Contributions made and expensed by the Company under the plan were $2,833 and $1,859 for the years ended December 31, 2015 and 2014, respectively.

10. Commitments and Contingencies

Leases

The Company rents certain facilities, office space, and equipment under noncancelable operating leases expiring at various dates through 2021. Future minimum lease payments under these leases as of December 31, 2015, are as follows:

Years Ended December 31:	
2016	$ 3,433
2017	2,950
2018	2,138
2019	1,317
2020	1,021
Thereafter	487
	$ 11,346

Rent expense for facilities and equipment was $14,385 and $11,556 during 2015 and 2014, respectively.

Environmental Liabilities

The Company is subject to extensive and evolving federal, state, and local environmental laws and regulations in the United States that have been enacted in response to technological advances and the public's increased concern over environmental issues. As a result of changing governmental policies in this area, management anticipates that the Company will continually modify or replace facilities and alter methods of operation. The majority of the expenditures necessary to comply with the environmental laws and regulations are made in the normal course of business. To the best of management's knowledge, the Company is in compliance, in all material respects, with the laws and regulations affecting its operations.

In the ordinary course of conducting its business activities, the Company also becomes involved in judicial and administrative proceedings in which governmental authorities seek remedial actions and/or fines and penalties. The Company does not anticipate that the amount of fines and penalties will have a material adverse impact on its financial condition; however, many environmental laws are written and enforced in such a way that the potential liability can be large, and it is possible that the Company's actual liability in any particular case or claim will prove to be larger than anticipated and accrued for by the Company.

10. Commitments and Contingencies (continued)

Azusa Remediation Costs

VES-TS owns and operates a hazardous waste treatment, storage, and disposal facility located in Azusa, California. Operations conducted at the Azusa facility consist of waste-solvent recycling, blending of liquid organic waste, physical treatment of wastes, and waste storage.

Historical waste management practices at the Azusa facility occurring prior to the Company's acquisition of the facility in 1999 have resulted in contamination of on-site soils with volatile organic compounds (VOCs). In 1999, the facility operated an extraction system to remove VOCs from the soil over a portion of the site using seven wells. In addition, there are other areas of soil contamination at the site that will require remediation activities. As of December 31, 2015 and 2014, the Company had an environmental liability recorded of $204 and $146, respectively, for future costs associated with the investigation and remediation of the soil contamination at the Azusa site. The Company expects that the remediation activities will continue to occur beyond 2018.

Insurance

The Company, through arrangements with VNA, carries a commercial general liability policy and a property damage policy. The Company maintains a limited environmental impairment liability policy on its sites and transfer stations that provides coverage, on a claims-made basis, against certain third-party, off-site, environmental damage. There can be no assurance that the limited environmental impairment policy will remain in place or provide sufficient coverage for existing, but not yet known, third-party, off-site, environmental liabilities.

10. Commitments and Contingencies (continued)

Legal

The Company is subject to extensive and evolving laws and regulations and has implemented the Company's own environmental safeguards to respond to regulatory requirements. In the normal course of conducting the Company's operations, the Company may become involved in certain legal and administrative proceedings. Some of these actions may result in fines, penalties, or judgments against the Company, which may have an impact on earnings for a particular period. The Company accrues for litigation and regulatory compliance contingencies when such costs are probable and can reasonably be estimated. The Company expects that matters in process at December 31, 2015, which have not been accrued in the consolidated financial statements, will not have a material adverse effect on its liquidity, financial position, or results of operations.

In the normal course of its business, and as a result of the extensive government regulation of the waste industry, the Company periodically may become subject to various judicial and administrative proceedings and investigations involving federal, state, or local agencies. The Company is involved in various environmental matters and governmental proceedings, including original or renewal permit filings in connection with the establishment, operations, and expansion of its facilities. There can be no assurance that such permits will be granted or that other related proceedings will be resolved in a manner favorable to the Company. The Company is also subject, from time to time, to personal injury or property damage claims and litigation arising out of accidents involving its vehicles. The Company believes that the ultimate resolution of these matters will not have a material adverse effect on the Company's financial condition or results of operations.

Contractual Commitments

In 2014, the Company also entered into two separate agreements to purchase electrical power for the hazardous waste incinerator located in Sauget, Illinois, and for the Company's transfer station and processing facilities located in Middlesex and Flanders, New Jersey. These agreements expired on various dates through 2015. The Company has one agreement to purchase electrical power at a fixed price for a facility located in Ohio, which expires in December 2016. The fair value of this purchase agreement was not material at December 31, 2015.