



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105**

**WASTE MANAGEMENT DIVISION
RCRA ENFORCEMENT OFFICE
TSCA COMPLIANCE EVALUATION INSPECTION REPORT**

Purpose: TSCA Compliance Evaluation Inspection

Facility: Veolia ES Technical Services, LLC
5736 W. Jefferson Street
Phoenix, AZ 85043

EPA ID Number: AZO 000 337 360

Date of Inspections: March 17, 2008 and
September 16, 2010

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Introduction

On March 17, 2008 and September 16, 2010, U.S. Environmental Protection Agency (“EPA”) and Arizona Division of Environmental Quality (“ADEQ”) representatives conducted unannounced Toxic Substances and Control Act (“TSCA”) Compliance Evaluation Inspections (“CEI”) of the Veolia ES Technical Solutions, LLC (“Veolia”) facility located at 5736 W. Jefferson Street, in Phoenix, Arizona. The purpose of the inspections was to determine Veolia’s compliance with the polychlorinated biphenyls (“PCBs”) regulations under 40 Code of Federal Regulations (“C.F.R.”) part 761.

EPA Region 9 led both TSCA CEIs. ADEQ was present during the March 17, 2008 inspection and not EPA’s follow-up visit on September 16, 2010. During both visits, the PCB inspectors conducted a physical inspection of the facility, collected PCB wipe samples and reviewed records related to Veolia’s PCB management practices.

This inspection report summarizes the events that transpired during both TSCA inspections and all observations made by the inspectors in the Exterior Storage Areas, Buildings 2 - 4, and the Outdoor Truck Bays.

Facility Background

Facility Name	Veolia ES Technical Solutions, LLC (“Veolia”)
Established	According to the <i>ReferenceUSA</i> Gov database, this facility location was first established in 1987 [Attachment III(B)].
Number of Employees	61
Hours of Operation	8 a.m. – 5 p.m.
Filed Notification of PCB Waste Activity	This facility location first filed its Notification of PCB Waste Activity form on May 9, 2000 [Attachment III(C)].
Facility Processes	Veolia is a full service hazardous, non-hazardous, and industrial waste disposal and recycling facility. The facility provides services pertaining to solvent recycling, incineration, laboratory chemical packaging, electronics recycling, fuel’s blending and other on-site services [Attachment III(D)]. Veolia received a TSCA Approval to store PCBs on December 15, 1994. In 2003, as part of a settlement agreement, EPA granted Veolia a temporary increase in PCB storage capacity (from 7,700 gallons to 22,935 gallons), until Veolia’s new TSCA Approval is finalized [Attachments IV(C) and (E)].

Waste Streams	The facility manages Non-PCB and PCB waste, universal waste, e-waste, phosphorous powder (D001), and mercury containing waste (D009) [Attachment III(E)].
PCB Facility Status	PCB Commercial Storage Facility, Transporter and Generator [Attachment III(C)].
Last Inspection	EPA Region 9 last conducted a TSCA CEI inspection on March 31, 2004. No actions were taken or penalties assessed as a result of the 2004 inspection.

Facility Inspection (March 17, 2008)

On March 17, 2008, EPA and ADEQ arrived at Building 1 of Veolia's Phoenix, Arizona facility at approximately 10:00 am. The inspectors announced their arrival at the receptionist desk and entered their names on the facility's Sign-In Sheet. Two EPA Region 9 inspectors (Mr. Christopher Rollins and Ms. Estrella Armijo) and three inspectors from ADEQ (Ms. Jaclyn M. Palermo, Ms. Jessica E. Olmstead and Mr. Travis M. Barnum) were present during this inspection.

EPA and ADEQ were greeted by Mr. Chip Humes, the Environmental Health and Safety Manager and Mr. D. Heath Hildebrand, the General Manager for Veolia. After introducing themselves the inspectors were escorted to a conference room in Building 4 for a facility overview and an EPA inspection in-brief.

During the in-brief, the inspectors presented their credentials. Mr. Rollins then presented and explained the Notice of Inspection form [Attachment I(A)] and a TSCA Inspection Confidentiality Notice form [Attachment I(B)] to the Veolia representatives.

Under TSCA, the Notice of Inspection form is required to be signed prior to conducting an inspection and the TSCA Confidentiality Notice form outlines Veolia's right to claim PCB materials collected during or after the inspection as TSCA Confidential Business Information ("CBI"). During the inspection, Veolia claimed its customer's names from its 2007 manifests and certificates of destruction TSCA CBI. Both EPA and the facility signed both forms and EPA concluded the in-brief.

After the in-brief, Mistery Humes and Hildebrand escorted the inspectors on a tour of the facility. Mr. Rollins led the EPA TSCA inspection and Ms. Armijo took photographs and assisted with the TSCA investigation. In addition, ADEQ also led a separate state hazardous waste inspection the same day, which focused primarily on hazardous waste activities near Building 1 [Attachment IV(D)]. However, this inspection report will only focus on the two EPA led PCB

visits at Veolia in March 2008 and September 2010.

The following tables summarize the areas inspected and the potential violations found near Veolia's Exterior Storage Areas, Buildings 2 – 4 and the Outdoor Truck Bays on March 17, 2008.

Area 1: Outdoor Truck Bay – Potential Violation (March 17, 2008)

Location	Container Type	Waste Type	Potential Violation	Photo
Truck Well	15-Gallon Poly Container	PCB Waste	No Removal from Service Date	1A

Comments: During the inspection, EPA observed a trailer parked in the truck well adjacent to Building 2. The inspector asked to see the contents of the trailer and discovered a 15-gallon blue poly container of PCB waste in the back.

The container did not appear to have a removal from service date indicated on the container. At the time of the inspection, Veolia was acting as the transporter of this waste. A third party company actually generated the PCB waste and not Veolia.

Area 2: Building 2 – Potential Violations (March 17, 2008)

Location	Container Type	Waste Type	Potential Violation	Photo
PCB Receiving Area	55-Gallon Metal Container	Liquid PCB Waste	No Removal from Service Date	2A
PCB Receiving Area	Caged Metal Box	PCB Contaminated Metals	None	N/A

Transformer Decommissioning Line	Water Bucket	Liquid PCB Waste	Improperly Labeled	2B
Transformer Decommissioning Line	PCB Decontamination Baths	Liquid PCB Waste	Approval Condition Violation, Improperly Labeled	2C-2D
Transformer Decommissioning Line	N/A	Liquid PCBs	Continued Use	2E

Comments: EPA observed a 55-gallon metal container in Veolia's PCB receiving area that was not marked with a removal from service date as required by law. At the time of the inspection, Veolia was operating as a transporter of PCB waste and not directly responsible for marking the container with a removal from service date until the waste was documented as received by Veolia.

The inspectors also observed an unmarked water bucket (used to mop up spills) and Veolia's PCB Decontamination Baths (used to decontaminate transformers and metals) in Building 2. Veolia often cleans up PCB liquids using the water bucket and decontaminates PCB equipment in the PCB Decontamination Bath that contains PCBs greater than 50 ppm. These PCB items were not marked with PCB M_L labels to notify those unfamiliar with PCBs of their presence.

In addition, EPA collected PCB surface wipes in Building 2 (VESW-1 to VESW-3). According to the analytical data, PCBs were documented at 283, 95 and 57 µg/100 cm² respectively. Under TSCA the regulatory threshold for unrestricted use of PCBs is < 10 µg/100 cm².

Area 3: Veolia's Exterior Storage Area – Potential Violation (March 17, 2008)

Location	Container Type	Waste Type	Potential Violation	Photo
Adjacent to Building 2	Metal Storage Pod	Leaky Bushings	None	N/A

PCB Debris Area	40 yd ³ White Metal Roll-Off	PCB Debris	None	N/A
Adjacent to Building 2	Metal Storage Pod	Leaky Non-PCB Transformers	None	3A
Adjacent to Building 3	6 yd ³ Blue/Red Metal Roll-Off	PCB Ballasts	No Removal from Service Date	3B
Adjacent to Building 3	2.5 yd ³ Grey Metal Hopper	PCB Ballasts	No Removal from Service Date	3B

Comments: EPA observed leaky bushings outside Building 2. The bushings were stored in a metal storage pod used to contain spills and absorbent was present in the pod. All of the bushings were Non-PCB (< 50 ppm) containing as indicated by the green dots on each bushing.

According to Veolia, the facility stores PCBs based on a color coded system. A yellow dot indicates an unknown concentration of PCBs present. A green dot indicates Non-PCB containing (< 50 ppm) material. A blue dot indicates PCB-Contaminated materials (≥ 50 and < 499 ppm) while a red dot indicates PCB containing materials ≥ 500 ppm.

EPA also observed two large transformers in a metal storage pod near Building 2. Staining was observed directly under the pod. However, both transformers were non-PCB containing as indicated by the green dots on each transformer. The inspectors did not collect PCB surface wipe samples adjacent to the pod.

In addition, Veolia also stored PCB ballasts in two roll-offs (Blue/Red and Grey) outside of Building 3. The roll-offs contained PCB ballasts intended for incineration. The roll-offs were marked with a PCB M_L label but not dated to indicate the earliest removal from service dates for each roll-off.

Area 4: Building 3 – Potential Violation (March 17, 2008)

Location	Container Type	Waste Type	Potential Violation	Photo
Decontaminated PCB Metals Storage Area	Caged Metal Box	PCB Contaminated Metals	None	N/A
PCB Drum Storage Area	40 55-Gallon Metal Containers	PCB Ballasts	None	N/A
Non-PCB Processing Areas	N/A	Liquid PCBs	Continued Use	4A

Comments: EPA documented the storage of decontaminated metals in Building 3. The metals were not marked or labeled to indicate whether PCBs were present or not. According to Veolia representatives, the metals had been decontaminated and stored in Building 3 pending the analytical results.

All 55-gallon metal containers stored in Building 3 were marked with a PCB M_L label and properly dated to indicate the date removed from service.

PCB surface wipes were also collected. On the day of EPA's inspection, one surface wipe was collected on the ramp leading to the TSCA Storage Area (VESW-4), one wipe sample at the Northwest entrance (VESW-5) and one wipe sample at the North entrance (VESW-6) to Building 3. EPA collected all three samples inside the building.

Based on the analytical data two samples (VESW-5 and VESW-6) exceeded the 10 µg/100 cm² limit for unrestricted use. EPA documented sample VESW-5 at 16.9 µg/100 cm² and sample VESW-6 was documented at 13.9 µg/100 cm².

Area 5: Building 4 – Potential Violation (March 17, 2008)

Location	Container Type	Waste Type	Potential Violation	Photo
Drum Storage	7 55-Gallon Metal Containers	Phosphorous Powder	None	N/A
Out-Going PCB Liquid Storage Area	N/A	Liquid PCBs	Continued Use	5A-5B

Comments: EPA inspectors observed staining beneath one of Veolia’s metal totes in Building 4. The totes in Building 4 were used for the storage of liquid PCBs ≥ 50 ppm. EPA sampled this stained area (VESW-7) during the inspection. EPA’s analytical reports documented PCBs present at $118 \mu\text{g}/100 \text{ cm}^2$. Under TSCA the regulatory threshold for unrestricted use of structures contaminated with PCBs is below $10 \mu\text{g}/100 \text{ cm}^2$.

In addition, EPA also detected PCBs at $10.2 \mu\text{g}/100 \text{ cm}^2$ on the west side of the same metal pod in Building 4.

Table 1: PCB Wipe Sample Results in $\mu\text{g}/100 \text{ cm}^2$ (March 17, 2008) – Attachment IV(A)

Sample Numbers	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Aroclor 1262	PCB Totals
VESW-1	ND	ND	ND	ND	ND	83	200	ND	283
VESW-2	ND	ND	ND	ND	ND	37	58	ND	95
VESW-3	ND	ND	ND	ND	ND	18	39	ND	57
VESW-4	ND	ND	ND	ND	ND	4.8	5.1	ND	9.9
VESW-5	ND	ND	ND	ND	ND	7.9	9	ND	16.9
VESW-6	ND	ND	ND	ND	ND	6.9	7	ND	13.9
VESW-7	ND	ND	ND	ND	ND	34	84	ND	118
VESW-8	ND	ND	ND	ND	ND	0.8	1.3	ND	2.1
VESW-9	ND	ND	ND	ND	ND	2.4	7.8	ND	10.2
VESW-10	ND	ND							

* PCBs in use $\geq 10 \mu\text{g}/100 \text{ cm}^2$ are equivalent to ≥ 50 ppm.

Follow-up Veolia Inspection (September 16, 2010)

On September 16, 2010, EPA Region 9 conducted a follow-up inspection of the Veolia Phoenix, AZ facility. Specifically, the Agency conducted the inspection to collect additional PCB records, document whether the PCB contamination found on-site in 2008 was remediated and whether PCBs had been released into the environment.

ADEQ did not accompany EPA on this inspection. The inspectors arrived at the facility around 9:56 am and announced their arrival at the receptionist desk in Building 1. EPA representatives Mr. Christopher Rollins, Ms. Estrella Armijo and Ms. Kandice Bellamy were greeted by new Veolia representatives Mr. Wayne Bulsiewicz (Environmental Health and Safety Manager) and Mr. James Harrison (Operations Manager).

After introductions, EPA was escorted to a conference room in Building 4 where the inspectors could perform their in-brief. The inspectors presented their credentials, explained the reason for their visit and presented new paper work under TSCA for the Veolia representatives to sign [Attachments II(A) and II(B)]. No documents requested or collected were declared TSCA CBI during this inspection.

During the in-brief, EPA informed the facility that PCB contamination had been documented in Buildings 2, 3 and 4, some at TSCA regulated levels, back in 2008. The levels ranged from non-detect to 283 $\mu\text{g}/100\text{ cm}^2$.

The inspectors asked Veolia if the PCB contaminated floors had ever been remediated. According to Scott Achbach, Veolia's Operations Supervisor, the facility remediated Buildings 2, 3 and 4 sometime after EPA's March 2008 inspection [Attachment V(A) – Response 5].

After the in-brief, misters Bulsiewicz and Harrison escorted the inspectors on a tour of the facility. Mr. Rollins lead the TSCA inspection, Ms. Armijo took photographs and Ms. Bellamy assisted with the investigation.

The following tables summarize the areas inspected and the potential violations found near Veolia's Exterior Storage Areas, Buildings 2 – 4 and the Outdoor Truck Bays on September 16, 2010.

Area 1-2: Outdoor Truck Bay – No Violation (September 16, 2010)

Location	Container Type	Waste Type	Potential Violation	Photo
Truck Well	10 55-Gallon Metal Containers	PCB Waste	None	N/A

Comments: All PCB containers were marked with a PCB M_L label and dated in accordance with TSCA.

Area 2-2: Building 2 – Potential Violations (September 16, 2010)

Location	Container Type	Waste Type	Potential Violation	Photo
PCB Receiving Area	6 55-Gallon Metal Containers	PCB Ballasts	No Removal from Service Date, Improperly Labeled	2-2A – 2-2B
Transformer Decommissioning Line	Vacuum	Solid PCB Debris	Improperly Labeled	2-2C - 2-2D
Transformer Decommissioning Line	N/A	Liquid PCBs	Continued Use	2-2E

Comments: During the inspection, EPA observed six 55-gallon PCB metal containers in Veolia’s PCB Receiving Area. The containers were not marked with a PCB M_L label or with a date indicating when the PCBs had been removed from service. The original generator, located in Union Grove, WI [EPA ID # WIR000000356] shipped the waste to Veolia for disposal. At the time of the inspection, Veolia operated as a transporter of PCB waste and therefore was not directly responsible for labeling the PCB containers prior to being received. However, once received and processed, Veolia accepts responsibility regarding proper management of the PCB waste.

EPA also observed a vacuum in Building 2 used to clean up PCB waste under the transformer decommissioning line. At the time of the inspection, the vacuum was not marked with a PCB M_L label to indicate the presence of PCBs.

Moreover, EPA documented the presence of PCBs directly below a plastic tote located near the Transformer Decommissioning Line. According to EPA's analytical data, PCBs were present at 32.4 µg/100 cm² (VEWS-2) directly under the opening for draining the tote. Under TSCA the threshold for unrestricted use of PCBs on structures contaminated with PCBs is below 10 µg/100 cm².

Area 3-2: Veolia's Exterior Storage Area – Potential Violation (September 16, 2010)

Location	Container Type	Waste Type	Potential Violation	Photo
Adjacent to Building 2	Metal Storage Pod	Liquid PCBs	None	N/A
Adjacent to Building 2	N/A	Liquid PCBs	Continued Use	3-2A
Adjacent to Building 3	Metal Storage Pod	Non-PCB Transformers	None	N/A

Comments: During the inspection, EPA collected PCB wipe samples of the area directly outside of Building 2. According to the analytical results, PCBs were documented at 150 µg/100 cm². Under the PCB regulations, the provisions that apply to PCBs at concentrations ≥ 50 to < 500 ppm also apply to contaminated surfaces (porous or non-porous) at PCB concentrations of ≥ 10 µg/100 cm² to < 100 µg/100 cm².

Area 4-2: Building 3 – Potential Violation (September 16, 2010)

Location	Container Type	Waste Type	Potential Violation	Photo
PCB Ballasts Storage Area	6 yd ³ Blue/Red Metal Roll-Off	PCB Ballasts	No Removal from Service Date	4-2A
PCB Ballasts Storage Area	6 yd ³ Blue/Red Metal Roll-Off	PCB Ballasts	No Removal from Service Date	4-2A
PCB Ballasts Storage Area	2.5 yd ³ Grey Metal Roll-Off	Non-PCB Ballasts	None	N/A

Comments: EPA observed two 6 cubic yard blue/red metal roll-offs in Building 3 used to store PCB ballasts. The roll-offs were marked with a PCB M_L label but not dated to indicate the earliest date removed from service for each container.

Area 5-2: Building 4 – No Violation (September 16, 2010)

Location	Container Type	Waste Type	Potential Violation	Photo
Out-Going PCB Liquid Storage Area	Totes	Liquid PCBs	None	N/A

Comments: EPA tested underneath and near the metal storage pods inside Building 4. According to the analytical results no PCBs were detected in Building 4 above the regulated threshold for unrestricted use.

Table 2: PCB Wipe Sample Results in $\mu\text{g}/100\text{ cm}^2$ (September 16, 2010) - Attachment IV(B)

Sample Numbers	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Aroclor 1262	Aroclor 1268	PCB Totals
VEWS-1	ND	ND	ND	ND	ND	ND	7.6	ND	ND	7.6
VEWS-2	ND	ND	ND	ND	ND	ND	27	ND	5.4	32.4
VEWS-3	ND	ND	ND	ND	ND	ND	150	ND	ND	150
VEWS-4	ND	ND	ND	ND	ND	ND	1.5	ND	ND	1.5
VEWS-5	ND	ND	ND	ND	ND	ND	4.5	ND	ND	4.5
VEWS-6	0.4	ND	ND	ND	ND	ND	1.5	ND	ND	1.9
VEWS-7	1.0	ND	ND	ND	ND	ND	1.7	ND	ND	2.7
VEWS-8	0.3	ND	ND	ND	ND	ND	1.5	ND	ND	1.8
VEWS-9	ND	ND	ND	ND	ND	ND	1.1	ND	ND	1.1
VEWS-10	0.3	ND	ND	ND	ND	ND	2.3	ND	ND	2.6
VEWS-11	ND	ND	ND	ND	ND	ND	1.0	ND	ND	1.0
VEWS-12	ND	ND								

* PCBs in use $\geq 10\ \mu\text{g}/100\text{ cm}^2$ are equivalent to $\geq 50\text{ ppm}$.

Record Review – Potential Violations

Record	Year(s)	Potential Violations
Manifests	2007	EPA documented seven instances where Veolia's Port Washington, WI facility and one instance where its Flanders, NJ facility listed itself as the generator of PCB waste. EPA documented one outgoing manifest where Veolia failed to indicate the removal from service date.
PCB Spill Notifications		No Violations
TSCA Commercial Storage Facility - Annual Report (Federal)	2007-2009	No Violations
TSCA Storage Capacity	2007	No Violations
Contingency Plan		N/A
Inspection Logs	2007-2008	N/A
Training Plan		N/A
Wastewater Discharge Permit #W-413297	N/A	N/A
Waste Analysis Plan and Results		N/A

Comments: During EPA's March 17, 2008 inspection, Veolia representatives claimed certain documents collected as TSCA CBI. The documents were claimed confidential to protect Veolia's client's names from being released. However, the documents released are manifests and certificates of disposal that the facility routinely submits to third party organizations. If Veolia still wants to claim this information TSCA CBI then please explain why and whether the same documents were also claimed CBI with the state agencies as well.

In addition, according to EPA's PCB Waste Handler Database, Veolia's Phoenix, AZ facility reported itself to EPA headquarters as a generator, transporter and commercial storer of PCB waste [See Attachment III(C)]. This facility location first reported its PCB status to EPA in May of 2000.

On February 6, 2007, the Phoenix facility documented the generation of PCB remediation waste from a January 2007 spill on its Uniform Hazardous Waste Manifest ("Manifest") [Manifest 000060683 VES – Attachment VI(A)]. According to the manifest, the Phoenix facility failed to indicate the removal from service date or provide its generator EPA identification number (AZO 000 337 360) on the document.

Instead of listing its EPA identification number, Veolia listed the generic EPA identification Number "40 CFR PART 761," used for facilities exempt from the PCB Notification requirements. Veolia is not exempt from EPA's PCB notification requirements because it operates a facility subject to the requirements under 40 C.F.R. § 761.65(b) and C(7) of TSCA. As such, the facility is required to use its EPA identification Number (AZO 000 337 360) when generating and shipping PCB waste off for disposal.

In addition, Veolia operates a commercial storage and transport facility in Port Washington, WI. The facility's Port Washington facility is not listed as a generator of PCBs waste [Attachment III(F)]. However, according to Veolia's manifest records, the Port Washington location lists itself as a generator of PCB waste. In fact the facility documents generating fully intact, non-leaky ballasts and ships that waste to the Phoenix, AZ facility for processing.

The facility receives PCBs from third party generators and transports that waste to its Phoenix, AZ location for final processing. Therefore, Veolia's Port Washington facility accepted PCB waste on seven occasions and its Flanders, NJ facility on one occasion without documenting the transactions on a manifest from the original generators [Attachment VI(B)].

Potential Violations of the TSCA PCB Requirements

1. Continued Use Violation [40 C.F.R. § 761.30(u)(1)].

Requirements:

TSCA requirement 40 C.F.R. § 761.30(u)(1), states that any person may use equipment, structures, other non-liquid or liquid materials that were contaminated with PCBs during manufacture, use, servicing, or because of spills from, or proximity to, PCBs ≥ 50 ppm, including those not otherwise authorized for use under this part provided:

- i) The materials were decontaminated in accordance with:
 - A) A TSCA PCB disposal approval issued under subpart D of this part;
 - B) Section 761.79; or
 - C) Applicable EPA PCB spill cleanup policies (e.g., TSCA, RCRA, CERCLA, EPA regional) in effect at the time of the decontamination; or
- ii) If not previously decontaminated, the materials now meet an applicable decontamination standard in §761.79(b).

Findings:

On March 17, 2008, EPA documented PCB contamination above the TSCA regulatory threshold for PCBs in Buildings 2, 3 and 4. According to the analytical report, the collected PCB surface wipes in Building 2 detected PCBs at 283, 95 and 57 $\mu\text{g}/100\text{ cm}^2$. PCBs were also detected in Building 3 at 16.9 and 13.9 $\mu\text{g}/100\text{ cm}^2$ near the west and north entrances, and at 118 and 10.2 $\mu\text{g}/100\text{ cm}^2$ in Building 4. All the surfaces identified as PCB containing were non-porous surfaces coated with an epoxy resin.

In addition, EPA inspected Veolia and collected PCB surface wipes in September 2010. According to Veolia, the facility decontaminated all the floors in Buildings 2, 3 and 4 after EPA's 2008 inspection. However, based on EPA's 2010 wipe samples additional contamination was discovered at 32.4 $\mu\text{g}/100\text{ cm}^2$ in Building 2, also over the threshold levels for unrestricted use of a PCB contaminated structure.

Under TSCA structures or equipment that exceed the 10 $\mu\text{g}/100\text{ cm}^2$ PCB threshold (Approximately 50 ppm) are required to be decontaminated in accordance with TSCA prior to continued use. As such, Veolia violated the PCB provisions for the continued use of the storage areas in Buildings 2, 3 and 4 in 2008 and Building 2 in 2010.

Veolia returned to compliance shortly after EPA's 2008 inspection for Buildings 2, 3 and 4 on March 25, 2008. The facility also reports that Veolia returned to compliance regarding Building 2's 2010 PCB contamination on September 25, 2010.

2. Improper Disposal [40 C.F.R. § 761.50(a)(4)].

Requirements:

TSCA Requirement 40 C.F.R. 761.50(a)(4), states spills and other uncontrolled discharges of PCBs at concentrations of ≥ 50 ppm constitute the disposal of PCBs.

Findings:

On September 16, 2010, EPA documented PCB contamination above the TSCA regulatory threshold for PCBs outside of Building 2. According to the analytical report, the inspectors collected a PCB surface wipe on the concrete outside of Building 2 and detected PCBs at $150 \mu\text{g}/100 \text{ cm}^2$. $10 \mu\text{g}/100 \text{ cm}^2$ is equivalent to about 50 ppm. As such, PCBs were detected outside of the facility approximately fifteen times the regulatory threshold, a violation under TSCA.

According to Veolia the facility began remediating the PCB contamination discovered outside Building 2. However, it is uncertain whether the facility remediated the PCBs under the PCB remediation provisions or some other authority. EPA may require additional cleanup to ensure PCBs were not released into the soil directly beneath the spill area.

3. Failure to Indicate the Removal from Service Date on PCBs and PCB Items [40 C.F.R. § 761.65(c)(8)].

Requirements:

TSCA requirement 40 C.F.R. § 761.65(c)(8), states that PCB Items shall be dated on the item when they are removed from service for disposal. The storage shall be managed so that the PCB Items can be located by this date. Storage containers provided in paragraph (c)(7) of this section, shall have a record that includes for each batch of PCBs the quantity of the batch and date the batch was added to the container. The record shall also include the date, quantity, and disposition of any batch of PCBs removed from the container.

Findings:

Veolia did not properly date two metal roll-off containers (Blue/Red and Grey) outside of Building 3, in March of 2008, with a removal from service date as required by law. The two roll-off containers contained PCB ballasts and were marked with a PCB M_L label, but not with the earliest date of removal, a violation of TSCA. Not listing the earliest removal from service date prevents EPA inspectors from determining how long the waste has been stored on-site.

In addition, in September 2010, Veolia failed to indicate the removal from service dates on two other roll-off containers (Both Blue/Red) filled with PCB ballasts inside Building

3. Similarly, the containers were marked with PCB M_L labels but not dated to indicate the earliest date of removal from service for PCB waste, a violation of TSCA.

On December 1, 2010, Veolia agreed to place the earliest removal from service date on each of its PCB containing metal roll-offs moving forward.

4. Violation of a TSCA PCB Approval Condition [40 C.F.R. § 761.65(d)(4)(iv)].

Requirements:

TSCA requirement 40 C.F.R. § 761.65(d)(4), states the written approval, issued by EPA shall include, but not be limited to, the following:

- i) The determination that the applicant has satisfied the requirements set forth in paragraph (d)(2) of this section, and a brief statement setting forth the basis for the determination.
- ii) Incorporation of the closure plan submitted by the facility owner or operator and approved by EPA.
- iii) A condition imposing a maximum storage capacity which the facility shall not exceed during its PCB waste storage operations. The maximum storage capacity imposed under this condition shall not be greater than the estimated maximum inventory of PCB waste included in the owner's or operator's application for final approval.
- iv) Such other conditions as deemed necessary by EPA to ensure that the operations of the PCB storage facility will not pose an unreasonable risk of injury to health or the environment.

Findings:

Under Condition C(6) of Veolia's December 15, 1994, Commercial PCB Storage and Lighting Ballasts Recycling Approval, all equipment used for the handling of PCBs and PCB Items that come in direct contact with PCBs should be marked with the PCB M_L label. The facility used a vacuum cleaner, a water bucket, and two PCB Decontamination Baths to clean-up and decontaminate PCB related materials in Building 2.

On March 17, 2008 and September 16, 2010, EPA inspectors observed that Veolia didn't have these three items marked with the PCB M_L label in accordance with TSCA.

Veolia returned to compliance on October 15, and December 1, 2010, when the facility marked its vacuum and PCB Decontamination Baths with a PCB M_L label. The water bucket appears to have been removed from the area entirely.

5. Failure to Include the Removal from Service Dates on PCB Manifests [40 C.F.R. §

761.207(a)].

Requirements:

TSCA requirement 40 C.F.R. § 761.207(a), states a generator who relinquishes control over PCB wastes by transporting, or offering for transport by his own vehicle or by a vehicle owned by another person, PCB waste for commercial off-site storage or off-site disposal shall prepare a manifest on EPA Form 8700-22, and if necessary, a continuation sheet. The generator shall specify:

- (1) For each bulk load of PCBs, the identity of the PCB waste, the earliest date of removal from service for disposal, and the weight in kilograms of the PCB waste.
- (2) For each PCB Article Container or PCB Container, the unique identifying number, type of PCB waste (e.g., soil debris, small capacitors), earliest date or removal from service for disposal, and weight in kilograms of the PCB waste contained.
- (3) For each PCB Article not in a PCB Container or PCB Article Container, the serial number if available, or other identification if there is no serial number, the date of removal from service for disposal, and weight in kilograms of the PCB waste in each PCB Article.

Findings:

According to the manifests EPA requested during the inspection, Veolia's Phoenix facility shipped a shipment of PCB waste off for disposal without listing the removal from service date on the manifest, a violation under TSCA.

To ensure compliance with TSCA, please ensure that removal from service dates are indicated on each outgoing Veolia PCB manifest.

6. Accepting PCB Waste Without a Manifest [40 C.F.R. § 761.208(b)(1)].

Requirements:

TSCA requirement 40 C.F.R. § 761.208(b)(1), states that a transporter shall not accept PCB waste from a generator unless it is accompanied by a manifest signed by the generator in accordance with 761.207(a).

Findings:

On March 17, 2008, EPA collected Veolia's incoming and outgoing 2007 PCB manifests. According to Veolia's documents, the facility improperly listed its Port Washington, WI facility as the generator of PCB waste on seven occasions and one for its Flanders, NJ facility.

A review of Veolia's Port Washington, WI Notification of PCB Activity form, documents the facility as a transporter and storer of PCB waste and not a generator of waste. Veolia's Flanders, NJ facility is listed as a transporter. As such, both facilities appear to have accepted PCB waste for the purposes of transportation without a manifest, from the original generators of the waste, violations under TSCA.

Areas of Concern Regarding Veolia's TSCA PCB Management

1. Periodic PCB Sampling

In March of 2008 and September 2010, EPA collected several PCB wipe samples on-site. As a result, EPA documented PCB releases above the TSCA regulatory threshold inside and outside the main PCB storage and processing areas.

In order to minimize releases in the future, EPA recommends that Veolia collect PCB samples using a third party on a periodic basis. The samples should be collected inside and outside all three Buildings, to detect whether PCBs have been improperly released into the environment. If PCBs are detected, Veolia must then implement a plan to decontaminate the affected areas in accordance with TSCA.

2. Tracking and Marking PCB Metals

During EPA's visits, the lead PCB inspector noted that Veolia did not properly track or mark its PCB metals undergoing decontamination in Buildings 2 or 3. The non-PCB metals and PCB containing metals appear to be decontaminated together, without a method by which to distinguish the metals from one another or track the metals throughout the decontamination process.

EPA recommends that Veolia establish a method for properly tracking and identifying the PCB and Non-PCB containing metals throughout the decontamination process.

3. PCB Commercial Storage Capacity

During EPA's September 2010 visit, the lead inspector asked Veolia representatives the current storage capacity for the facility. According to the Veolia representatives, they were under the impression that the current PCB Storage capacity was 24,000 gallons. Under the September 26, 2003 settlement agreement between EPA and Onyx Special Services (formerly Veolia), the facility can only store a total of 22,935 gallons of PCBs at any one time.

EPA recommends that Veolia ensures that the facility is operating in accordance with their 2003 PCB settlement agreement limits and that of TSCA by tracking the capacity of PCBs on-site at any given time.

4. Leaking PCB Metal Storage Pods

In 2008, the lead EPA inspector documented leaks below two metal storage pods on-site. One of the leaky storage pods was adjacent to Building 2 and the other inside Building 4. The leak in Building 4 was confirmed and identified as PCB containing liquids. This PCB leak led to the Agency alleging a continuing use violation towards Veolia in 2008. In order to prevent future releases, EPA recommends that periodic testing of the metal storage pods be conducted to verify the structural integrity of the unit.

Photo Log

Area1 (First EPA Visit)

Area: Building 2		
Location: Truck Well		
Photo: 1A	Date: 3/17/08	
Potential Violation: 40 C.F.R. § 761.65(c)(8)		
Description: A photo of a 15-gallon poly container of PCB waste missing its removal from service date. At the time, Veolia was operating as the transporter of this waste and not subject to the generator requirements.		

Area 2

Area: Building 2		
Location: Receiving Area		
Photo: 2A	Date: 3/17/08	
Potential Violation: 40 C.F.R. § 761.65(c)(8)		
Description: A photo of a metal 55 gallon container of PCBs without a removal from service date written on the container. The drum was placed in Veolia's receiving area on the day of the inspection in preparation for processing.		

Area 2

Area: Building 2	
Location: Transformer Decommissioning Line	
Photo: 2B	Date: 3/17/08
Potential Violation: 40 C.F.R. § 761.40 (a) 40 C.F.R. § 761.65(d)(4)(iv)	
Description: Veolia stated that this bucket was used to cleanup Building 2's PCB storage and decommissioning areas. EPA recommended that Veolia mark this bucket with a PCB M _L label to notify those unfamiliar with PCBs of its presence.	



Area 2

Area: Building 2	
Location: PCB Decontamination Bath	
Photo: 2C	Date: 3/17/08
Potential Violation: 40 C.F.R. § 761.40(a) and 40 C.F.R. § 761.65(d)(4)(iv)	
Description: Veolia operated two decontamination baths in Building 2. The two baths were used to decontaminate PCB containing equipment but were not marked with PCB M _L labels. EPA recommended that they be labeled to indicate the presence of PCBs.	



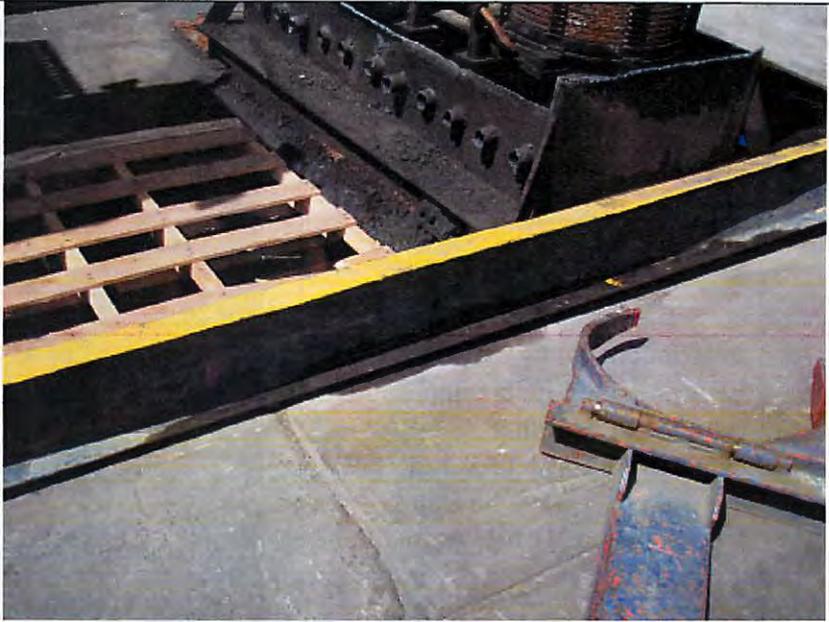
Area 2

Area: Building 2		
Location: PCB Decontamination Bath		
Photo: 2D	Date: 12/1/10	
Return to Compliance: December 1, 2010		
Description: Veolia placed PCB labels on their two tanks after EPA's inspection.		

Area 2

Area: Building 2		
Location: Transformer Decommissioning Line		
Photo: 2E	Date: 3/17/08	
Potential Violations: 40 C.F.R. § 761.30(u)		
Description: EPA documented PCBs on the surface of Building 2's floor. During the inspection EPA collected three wipe samples (VESW-1 to VESW-3). The PCBs present were detected at 57, 95 and 283 $\mu\text{g}/100\text{ cm}^2$.		

Area 3

Area: Veolia's Exterior Storage Area		
Location: Adjacent to Building 2		
Photo: 3A	Date: 3/17/08	
Potential Violation: NONE		
Description: A photo of a leaky metal storage pod. Veolia indicated that this pod was used for storing non-PCB (< 50 ppm) equipment. The transformer's stored inside were marked with green dots.		

Area 3

Area: Veolia's Exterior Storage Area		
Location: Adjacent to Building 3		
Photo: 3B	Date: 3/17/08	
Potential Violation: 40 C.F.R. § 761.65(c)(8)		
Description: EPA observed two metal roll-offs used for the storage of PCB ballasts. The ballasts were being sent intact for disposal to a TSCA regulated facility. Veolia labeled the roll-offs but did not include the removal from service dates on each roll-off.		

Area 4

Area: Building 3		
Location: Non-PCB Processing Areas		
Photo: 4A	Date: 3/17/08	
Potential Violation: 40 C.F.R. § 761.30(u)		
Description: EPA collected PCB wipe samples in Building 3. EPA detected PCBs at 13.9 and 16.9 $\mu\text{g}/100\text{ cm}^2$ (Wipe Samples VESW-5 and VESW-6) inside the building.		

Area 5

Area: Building 4		
Location: Out-Going PCB Liquid Storage Area		
Photo: 5A	Date: 3/17/08	
Potential Violation: 40 C.F.R. § 761.30(u)		
Description: EPA collected wipe samples in Building 4 adjacent to Veolia's metal storage pod. The metal storage pod was used to store liquid PCB totes. EPA's results documented PCB contamination at 118 $\mu\text{g}/100\text{ cm}^2$ (Wipe Sample VESW-7).		

Area 5

Area: Building 4	
Location: Out-Going PCB Liquid Storage Area	
Photo: 5B	Date: 3/17/08
Potential Violation: 40 C.F.R. § 761.30(u)	
Description: EPA also detected PCB contamination in Building 4 on the west side of the same metal storage pod at 10.2 µg/100 cm ² (Wipe Sample VESW-9).	



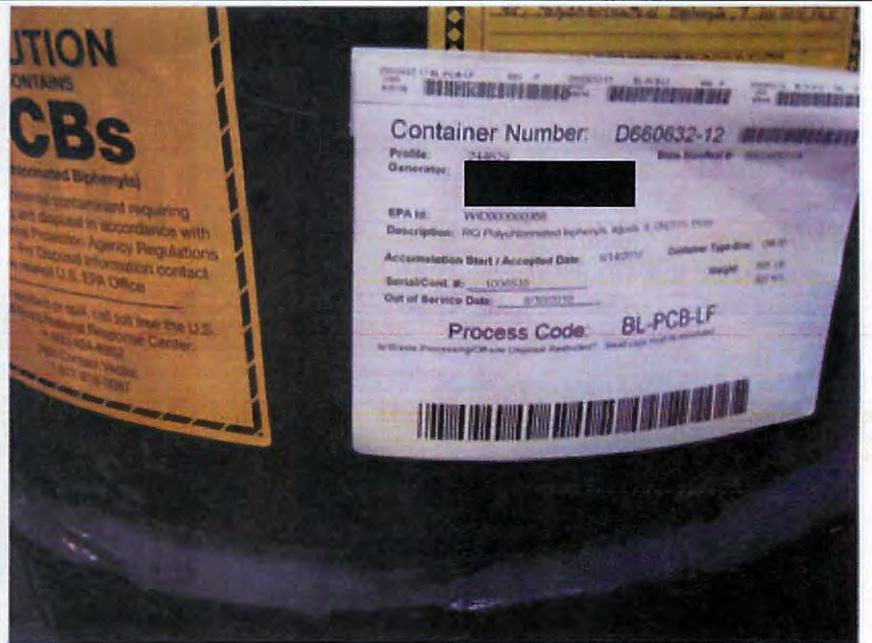
Area 2-2 (Second EPA Visit)

Area: Building 2	
Location: Receiving Area	
Photo: 2-2A	Date: 9/16/10
Potential Violations: 40 C.F.R. § 761.40(a) and 40 C.F.R. § 761.65(c)(8)	
Description: EPA observed six metal containers of PCB ballasts that were not marked with a PCB M _L label or dated to indicate the removal from service date. At the time of the inspection, Veolia was operating as the transporter of this PCB waste.	



Area 2-2

Area: Building 2	
Location: Receiving Area	
Photo: 2-2B	Date: 10/15/10
Return To Compliance: October 15, 2010	
Description: Veolia returned to compliance on October 15, 2010, when it marked and dated the six metal containers of PCB ballasts that were received by the generator in Union Grove, WI.	



Area 2-2

Area: Building 2	
Location: Transformer Decommissioning Line	
Photo: 2-2C	Date: 9/16/10
Return To Compliance: 40 C.F.R. § 761.40(a) 40 C.F.R. § 761.65(d)(4)(iv)	
Description: EPA observed an unmarked vacuum that was used in the PCB decontamination process at Veolia. EPA recommended that the vacuum be marked with a M _L label to notify those unfamiliar with PCBs of its presence.	



Area 2-2

Area: Building 2		
Location: Transformer Decommissioning Line		
Photo: 2-2D	Date: 10/15/10	
Return To Compliance: October 15, 2010		
Description: Veolia returned to compliance by placing a PCB M _L label on the vacuum dedicated to the PCB Decommissioning area.		

Area 2-2

Area: Building 2		
Location: Transformer Decommissioning Line		
Photo: 2-2E	Date: 9/16/10	
Potential Violation: 40 C.F.R. § 761.30(u)		
Description: EPA collected wipe samples in Building 2 adjacent to Veolia's Transformer Decommissioning Line and directly under a liquid PCB tote. According to the wipe sample, EPA detected PCBs above the TSCA PCB threshold at 32.4 µg/100 cm ² .		

Area 3-2

Area: Veolia's Exterior Storage Area	
Location: North East Roll-up Door	
Photo: 3-2A	Date: 9/16/10
Potential Violation: 40 C.F.R. § 761.50(a)(4)	
Description: EPA collected a wipe sample directly outside Building 2's roll-up doors. According to the results (VEWS-3), PCBs were detected at 150 µg/100 cm ² . Veolia should conduct additional sampling to determine the extent of contamination at this location.	



Area 4-2

Area: Building 3	
Location: Non-PCB Processing Areas	
Photo: 4-2A	Date: 9/16/10
Potential Violation: 40 C.F.R. § 761.65(c)(8)	



<p>Description: Veolia failed to indicate the removal from service dates on two metal roll-off containers stored in Building 3. These two roll-offs were marked with a PCB M_L label but not dated.</p>	
--	--

ATTACHMENT I

- A. Notice of Inspection - (3/17/08)
- B. TSCA Inspection Confidentiality Notice - (3/17/08)
- C. Declaration of Confidential Business Information
- (3/17/08)
- D. Receipt for Samples and Documents - (3/17/08)
- E. Chain of Custody - (3/17/08)
- F. Figures 1 - 2 (3/17/08)

**Veolia ES Technical Solutions, LLC
5736 W. Jefferson Street
Phoenix, AZ 85043**

**March 17, 2008 and
September 16, 2010**



United States Environmental Protection Agency
 Washington, D.C. 20460
 Toxic Substances Control Act
 NOTICE OF INSPECTION

Form Approved
 OMB No. 2070-0007
 Approval Expires 10-31-92

The public reporting burden for this collection of information is estimated to average 5 minutes per response. This estimate includes time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information to the Chief, Information Policy Branch (PM-223), US Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, marked ATTENTION: Desk Officer for EPA.

1. Investigation Identification			2. Time 10:01 AM	3. Firm Name Veolia Es Technical Solutions, LLC
Date 3/17/08	Inspector No. F10377	Daily Seq. No. #1		
4. Inspector Address USEPA - R9 75 Hawthorne St SF, CA 94105			5. Firm Address 5736 W. Jefferson Street Phoenix, AZ 85043	

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

In addition, this inspection extends to (Check appropriate blocks):

- A. Financial data
- B. Sales data
- C. Pricing data
- D. Personnel data
- E. Research data
- F. Manifests/Bills of Lading

The nature and extent of inspection of such data specified in A through E above is as follows:

<p align="center">Certification</p> <p>I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.</p>			
Inspector Signature Chris Rollins		Recipient Signature Heath Hildebrand	
Name Chris Rollins		Name HEATH HILDEBRAND	
Title Enviro. Protec. Special.	Date Signed 3/17/08	Title GM	Date Signed 3/17/08



United States Environmental Protection Agency
 Washington, D.C. 20460
 Toxic Substances Control Act
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Form Approved
 OMB No. 2070-0007
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Date	Inspector No.	Daily Seq. No.		
3/17/08	F10377	#1	10:01 AM	Veolia ES Technical Solutions, LLC
4. Inspector Address			5. Firm Address	
US EPA - R9 75 Hawthorne St SF, CA 94105			5736 W. Jefferson Street Phoenix, AZ 85043	

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In addition, this inspection extends to (Check appropriate blocks):

A. Financial data

D. Personnel data

B. Sales data

E. Research data

C. Pricing data

F. Manifests/Bills of Lading

The nature and extent of inspection of such data specified in A through E above is as follows:

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Inspector Signature		Recipient Signature	
Chris Rollins		Heather Wilcoff	
Name		Name	
Chris Rollins		Heather Wilcoff	
Title	Date Signed	Title	Date Signed
Enviro. Protec. Special.	3/17/08	GM	3/17/08



United States Environmental Protection Agency
Washington, D.C. 20460
Toxic Substances Control Act

Form Approved
OMB No. 2070-0007
Approval Expires 10-31-92

TSCA INSPECTION CONFIDENTIALITY NOTICE

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1. Investigation Identification			2. Firm Name	
Date 3/17/08	Inspector No. F10377	Daily Seq. No. #1	Veolia ES Technical Solutions, LLC	
3. Inspector Name Christopher Rollins			4. Firm Address 5736 W. Jefferson Street Phoenix, AZ 85043	
5. Inspector Address USEPA - R9 75 Hawthorne St SF, CA 94105			6. Chief Executive Officer Name	
			7. Title	

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of the Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:

I have received and read the notice.

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.

Certification
I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Name
Name LEAH HILDEBRAND	Title
Title GM	Address
Date Signed 3/17/08	



United States Environmental Protection Agency
Washington, D.C. 20460

Toxic Substances Control Act

TSCA INSPECTION CONFIDENTIALITY NOTICE

Form Approved
OMB No. 2070-0007
Approval Expires 10-31-92

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1. Investigation Identification			2. Firm Name	
Date	Inspector No.	Daily Seq. No.	Uplink ES Technical Solutions, LLC	
3/17/08	F70377	#1		
3. Inspector Name			4. Firm Address	
Christopher Rollins			5736 W. Jefferson Street Phoenix, AZ 85043	
5. Inspector Address			6. Chief Executive Officer Name	
US EPA - R9 75 Hawthorne St SF, CA 94105				
			7. Title	

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While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

- Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

- The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
- The information is not publicly available elsewhere.
- Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

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and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of the Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:		If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.	
I have received and read the notice.			
Certification			
I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			
Signature	Name		
[Signature]	LEAT RILDEBRAND		
Name	Title		
GM			
Title	Date Signed	Address	
	3/17/08		



ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

Form Approved
OMB No. 2070-0007
Expires 3-31-88

DECLARATION OF CONFIDENTIAL BUSINESS INFORMATION

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME	
DATE 3/17/08	INSPECTOR NO. F10377	DAILY SEQ. NO. #1	Veolia ES Technical Solutions, LLC	
3. INSPECTOR ADDRESS USEPA Region 9 75 Hawthorne St SE, CA 94105			4. FIRM ADDRESS 5736 W. Jefferson Street Phoenix, AZ 85043	

INFORMATION DESIGNATED AS CONFIDENTIAL BUSINESS INFORMATION

NO.	DESCRIPTION
1	yrs worth of manifest (incoming/outgoing)
1	yrs worth of certificates of disposal/destruction (customer's info claimed CBI)

ACKNOWLEDGEMENT BY CLAIMANT

The undersigned acknowledges that the information described above is designated as Confidential Business Information under Section 14(c) of the Toxic Substances Control Act. The undersigned further acknowledges that he/she is authorized to make such claims for his/her firm.

The undersigned understands that challenges to confidentiality claims may be made, and that claims are not likely to be upheld unless the information meets the following guidelines: (1) The company has taken measures to protect the confidentiality of the information and it intends to continue to take such measures; (2) The information is not, and has not been reasonably attainable without the company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding); (3) The information is not publicly available elsewhere; and (4) Disclosure of the information would cause substantial harm to the company's competitive position.

INSPECTOR SIGNATURE <i>Chris Rollins</i>		CLAIMANT SIGNATURE <i>Heath A. Hildebrand</i>	
NAME Chris Rollins		NAME HEATH HILDEBRAND	
TITLE Envi. Pro & Specialist	DATE SIGNED 3/17/08	TITLE GM	DATE SIGNED 3/17/08



U.S. ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

Form Approved
OMB No. 2070-0007
Expires 3-31-88

DECLARATION OF CONFIDENTIAL BUSINESS INFORMATION

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME	
DATE 3/17/05	INSPECTOR NO. F10377	DAILY SEQ. NO. #1	Medina CS Technical Solutions, LLC	
3. INSPECTOR ADDRESS US EPA Region 9 75 Hawthorne St Phoenix, AZ 85015			4. FIRM ADDRESS 3736 W. Jefferson Street Phoenix, AZ 85018	

INFORMATION DESIGNATED AS CONFIDENTIAL BUSINESS INFORMATION

NO.	DESCRIPTION
1	1 yrs worth of manifest (incoming/outgoing)
1	1 yrs worth of Certificates of Disposal/Destruction (customer's info claimed CBI)

ACKNOWLEDGEMENT BY CLAIMANT

The undersigned acknowledges that the information described above is designated as Confidential Business Information under Section 14(c) of the Toxic Substances Control Act. The undersigned further acknowledges that he/she is authorized to make such claims for his/her firm.

The undersigned understands that challenges to confidentiality claims may be made, and that claims are not likely to be upheld unless the information meets the following guidelines: (1) The company has taken measures to protect the confidentiality of the information and it intends to continue to take such measures; (2) The information is not, and has not been reasonably attainable without the company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding); (3) The information is not publicly available elsewhere; and (4) Disclosure of the information would cause substantial harm to the company's competitive position.

INSPECTOR SIGNATURE <i>Chris Rollins</i>		CLAIMANT SIGNATURE <i>[Signature]</i>	
NAME Chris Rollins		NAME LARRY UNDERWOOD	
TITLE Env. Bio Specialist	DATE SIGNED 3/17/05	TITLE GM	DATE SIGNED 3/17/05



US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

RECEIPT FOR SAMPLES AND DOCUMENTS

1. INVESTIGATION IDENTIFICATION			2. COMPANY NAME	
DATE	INSPECTION NO.	DAILY SEQ. NO.	Veolia ES Technical Solutions, LLC	
3/17/08	08-01	# 1		
3. INSPECTOR ADDRESS			4. COMPANY ADDRESS	
USEPA - R9 75 Hawthorne Street SF, CA 94105			5736 W. Jefferson Street Phoenix, AZ 85043	

For internal EPA use. Copies of this form may be provided to recipient as acknowledgement of the documents and samples of chemical substances and/or mixtures described below collected in connection with the administration and enforcement of the Toxic Substances Control Act.

RECEIPT OF DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
10	PCB Wipe Samples
1	1 yrs worth of manifests/Bills of Lading (PCB) Incoming + outgoing (1/07-12/07)
1	1 yrs worth of Certificates of Disposal/Destruction
9	Wipe samples side-by-side given to Veolia splits of wipes not applicable

OPTIONAL:

DUPLICATE OR SPLIT SAMPLES: REQUESTED AND PROVIDED

NOT REQUESTED

INSPECTOR SIGNATURE

Chris Rollins

CLAIMANT SIGNATURE

[Handwritten Signature]

NAME

Chris Rollins

NAME

HEATH HILDEBRAND

TITLE

Environmental Pro. Specialist

DATE SIGNED

3/17/08

TITLE

GM

DATE SIGNED

3/17/08



US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

RECEIPT FOR SAMPLES AND DOCUMENTS

1. INVESTIGATION IDENTIFICATION			2. COMPANY NAME	
DATE	INSPECTION NO.	DAILY SEQ. NO.	Veolia ES Technical Solutions, LLC	
3/17/08	08-01	# 1		
3. INSPECTOR ADDRESS			4. COMPANY ADDRESS	
USEPA - R9 75 Hawthorne Street SF, CA 94105			5736 W. Jefferson Street Phoenix, AZ 85043	

For internal EPA use. Copies of this form may be provided to recipient as acknowledgement of the documents and samples of chemical substances and/or mixtures described below collected in connection with the administration and enforcement of the Toxic Substances Control Act.

RECEIPT OF DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
10	PCB wipe samples
1	1 yrs worth of manifests/Bills of Lading (PCB) Incoming + outgoing (1/07-12/07)
1	1 yrs worth of Certificates of Disposal/Destruction
9	Wipe samples side-by-side given to Veolia splits of wipes not applicable

OPTIONAL:
 DUPLICATE OR SPLIT SAMPLES: REQUESTED AND PROVIDED NOT REQUESTED

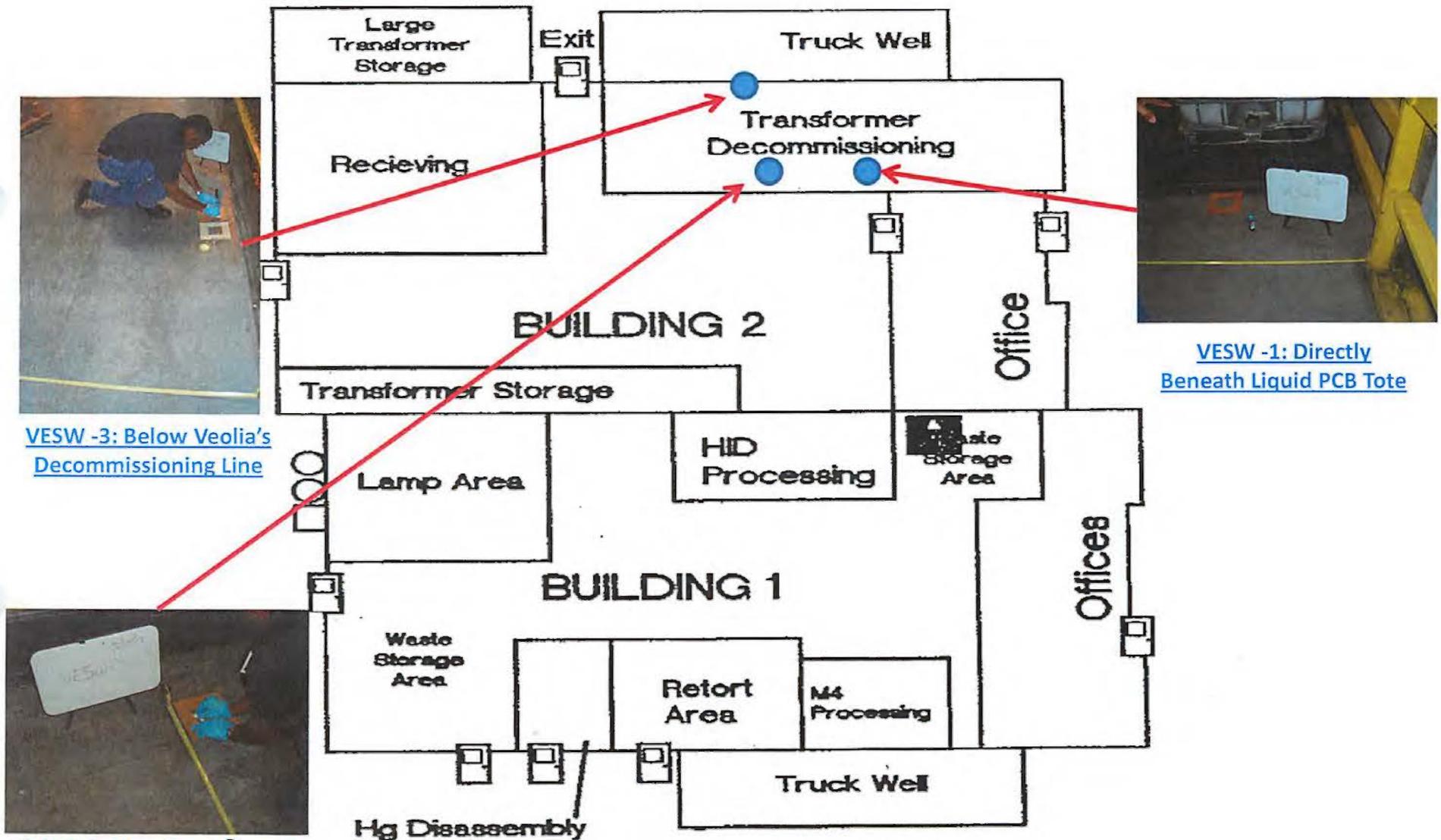
INSPECTOR SIGNATURE Chris Rollins		CLAIMANT SIGNATURE <i>[Signature]</i>	
NAME Chris Rollins		NAME HEATH HILDEBRAND	
TITLE Environmental Pro. Specialist	DATE SIGNED 3/17/08	TITLE GM	DATE SIGNED 3/17/08

CHAIN OF CUSTODY RECORD

PROJ. NO.		PROJECT NAME					NO. OF CONTAINERS	REMARKS					
PCRA02015V1		Phoenix TSCA PCB Sampling 2008											
SAMPLERS: (Signature)							PCBs						
Chris Rollins													
DATE	TIME	MATRIX	COMP.	GRAB	SAMPLE IDENTIFICATION								
3/17/08	5:45 PM	wipe		X	VESW-1 - VESW-10	10	X				Wipe samples from Ucolia (Floor)		
3/17/08	2:48 PM	wipe		X	EPSW-1 - EPSW-7	7	X				Wipe samples from EPSI (Floor/Ballast)		
3/19/08	12:40 PM	wipe		X	LRSW-1 - LRSW-11	11	X				Wipe samples from LRT (Floor, Drains)		
3/18/08	3:15 PM	metal		X	EPRM-1 - EPRM-4	4	X				Wipe samples for EPSI (Cu + Al)		
Relinquished by: (Signature)			Date / Time		Received by: (Signature)			Relinquished by: (Signature)		Date / Time		Received by: (Signature)	
Chris Rollins			3/20/08 8:00 AM		Leida T. [Signature]								
Relinquished by: (Signature)			Date / Time		Received by: (Signature)			Relinquished by: (Signature)		Date / Time		Received by: (Signature)	
Received for Laboratory by: (Signature)			Date / Time		Temp.	Seals Intact (Y/N)		Conditions / Remarks					

Distribution: Original Accompanies Shipment; Copy to Coordinator Field Files

Veolia ES Technical Solutions
PCB Commercial Storage Facility



VESW -3: Below Veolia's Decommissioning Line

VESW -1: Directly Beneath Liquid PCB Tote

VESW -2: Near Transformer Decommissioning Area

Figure 1: EPA's Approximate PCB Wipe Sample Locations VESW-1 to 3 ("3/17/08")

Veolia ES Technical Solutions
PCB Commercial Storage Facility



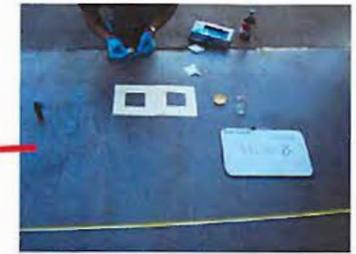
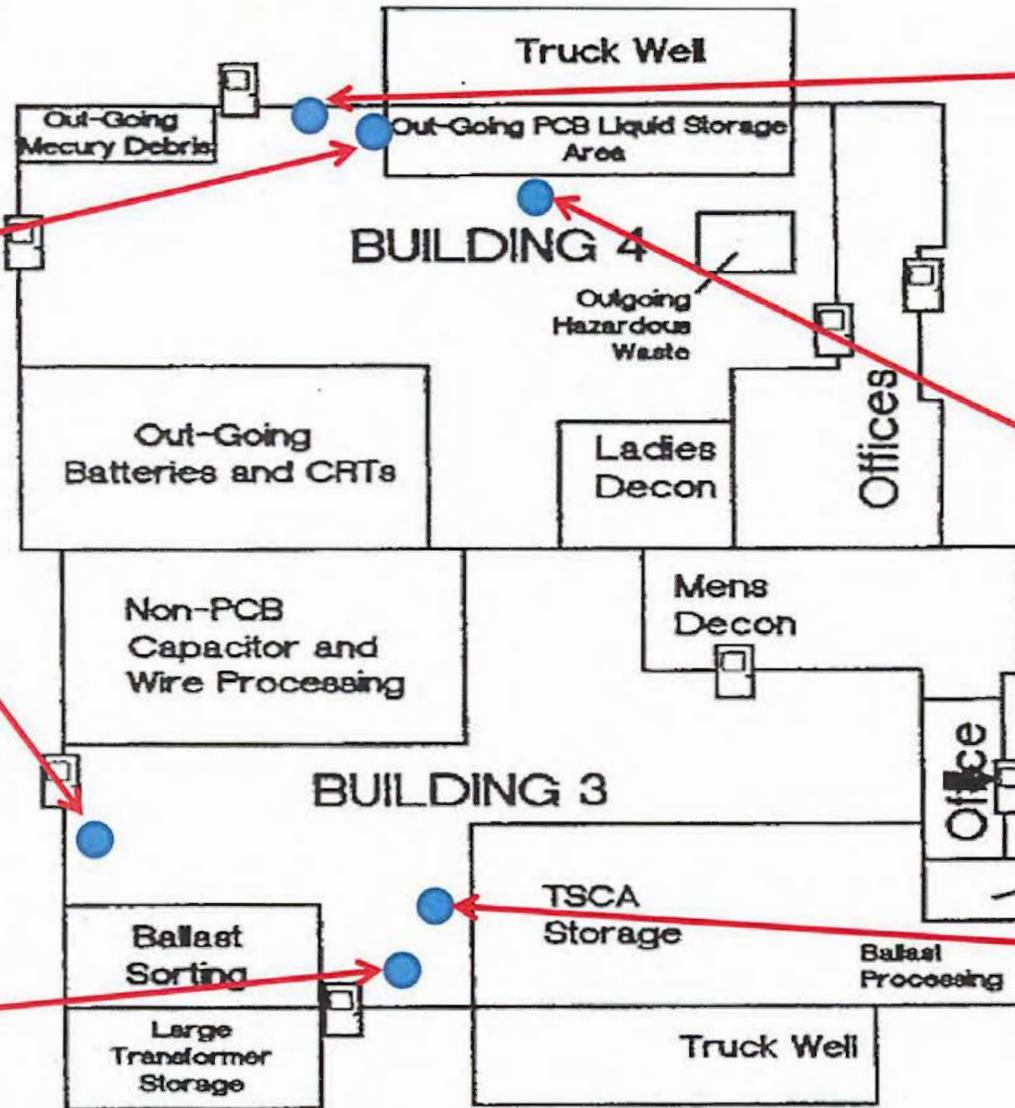
VESW-7: Near Metal Storage Pod



VESW-6: Bldg 3's North Entrance



VESW-5: Bldg 3's Northwest Entrance



VESW-8: Bldg 4's Northeast Entrance



VESW-9 & 10: West Side of Metal Storage Pod



VESW-4: Near the Ramp to the TSCA Storage Area

Figure 2: EPA's Approximate PCB Wipe Sample Locations VESW-4 to 10 ("3/17/08")

ATTACHMENT II

- A. Notice of Inspection - (9/16/10)
- B. TSCA Inspection Confidentiality Notice - (9/16/10)
- C. Receipt for Samples and Documents - (9/16/10)
- D. Chain of Custody - (9/16/10)
- E. Figures 3 - 4 (9/16/10)

**Veolia ES Technical Solutions, LLC
5736 W. Jefferson Street
Phoenix, AZ 85043**

**March 17, 2008 and
September 16, 2010**



United States Environmental Protection Agency
 Washington, D.C. 20460
 Toxic Substances Control Act
 NOTICE OF INSPECTION

Form Approved
 OMB No. 2070-0007
 Approval Expires 10-31-92

The public reporting burden for this collection of information is estimated to average 5 minutes per response. This estimate includes time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information to the Chief, Information Policy Branch (PM-223), US Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, marked ATTENTION: Desk Officer for EPA.

1. Investigation Identification			2. Time	3. Firm Name
Date 9/16/10	Inspector No. F70377	Daily Seq. No. #4	9:56am	Veolia Environmental Services
4. Inspector Address 75 Hawthorne Street San Francisco, CA 94105			5. Firm Address 5736 W. Jefferson Street Phoenix, AZ 85043	

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

In addition, this inspection extends to (Check appropriate blocks):

- | | |
|--|--|
| <input type="checkbox"/> A. Financial data | <input type="checkbox"/> D. Personnel data |
| <input type="checkbox"/> B. Sales data | <input type="checkbox"/> E. Research data |
| <input type="checkbox"/> C. Pricing data | |

The nature and extent of inspection of such data specified in A through E above is as follows:

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Inspector Signature Chris Rollins		Recipient Signature 	
Name Chris Rollins		Name Wayne Buker	
Title Enviro Protect Special	Date Signed 9/16/10	Title EHS Manager	Date Signed 9-16-2010



United States Environmental Protection Agency
 Washington, D.C. 20460
 Toxic Substances Control Act
 NOTICE OF INSPECTION

Form Approved
 OMB No. 2070-0007
 Approval Expires 10-31-92

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1. Investigation Identification			2. Time	3. Firm Name
Date 9/16/10	Inspector No. F20377	Daily Seq. No. #4	9:56am	Veolia Environmental Services
4. Inspector Address 15 Hawthorne Street San Francisco, CA 94105			5. Firm Address 5736 W. Jefferson Street Phoenix, AZ 85043	

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

In addition, this inspection extends to (Check appropriate blocks):

- | | |
|--|--|
| <input type="checkbox"/> A. Financial data | <input type="checkbox"/> D. Personnel data |
| <input type="checkbox"/> B. Sales data | <input type="checkbox"/> E. Research data |
| <input type="checkbox"/> C. Pricing data | |

The nature and extent of inspection of such data specified in A through E above is as follows:

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Inspector Signature Chris Rollins		Recipient Signature Wayne Bukowitz	
Name Chris Rollins		Name Wayne Bukowitz	
Title Enviro Protect Specialist	Date Signed 9/16/10	Title EHS Manager	Date Signed 9-16-2010



TOXIC SUBSTANCES CONTROL ACT

TSCA INSPECTION CONFIDENTIALITY NOTICE

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME	
DATE 9/16/10	INSPECTOR NO. P10377	DAILY SEQ. NO. A7	Veolia ERS Technical Solutions	
3. INSPECTOR NAME Chris Pollina			4. FIRM ADDRESS 5736 W. Jefferson St Phoenix, AZ 85043	
5. INSPECTOR ADDRESS 75 Hawthorne St San Francisco, CA 94105			6. CHIEF EXECUTIVE OFFICER NAME James Bell	
			7. TITLE CEO	

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:

I have received and read the notice

SIGNATURE 	
NAME Wayne Boblewicz	
TITLE EHS Manager	DATE SIGNED 9/14/2010

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.

NAME	TITLE	ADDRESS

Paperwork Reduction Act Notice

The public reporting burden for this collection of information is estimated to average 5 minutes per response. This estimate includes time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information to the Chief, Information Policy Branch (PM-223), US Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, marked ATTENTION: Desk Officer for EPA.



TSCA INSPECTION CONFIDENTIALITY NOTICE

Form Approved
OMB No. 2070-0007
Approval expires 10-31-92

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME	
DATE 9/16/10	INSPECTOR NO. F70377	DAILY SEQ. NO. 112	Vedol & Sons, Inc. of Solutions	
3. INSPECTOR NAME Chris Kellum			4. FIRM ADDRESS 6776 Union Street San Francisco, CA 94133	
5. INSPECTOR ADDRESS 75 Haight Street San Francisco, CA 94102			6. CHIEF EXECUTIVE OFFICER NAME T. J. ...	
			7. TITLE CEO	

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

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- The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
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The statement from the Chief Executive Officer should be addressed to:

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:		If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.	
I have received and read the notice			
SIGNATURE 		NAME	
NAME Wayne Bobrowicz		TITLE	
TITLE EPA Manager	DATE SIGNED 9/16/2010	ADDRESS	

Paperwork Reduction Act Notice

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1. Agency Use Only OMB No. 2030-0047 EPA Form 2680-101 (Rev. 10-1980)	2. Report Number EPA-600/3-80-010
3. Report Date August 1980	4. Report Type and Period Covered Final Report
5. Author(s)	6. Title and Subtitle
7. Author(s) Organization	8. Contract or Grant Number



**United States Environmental Protection Agency
Washington, D.C. 20460
Toxic Substances Control Act
RECEIPT FOR SAMPLES AND DOCUMENTS**

Form Approved
OMB No. 2070-0007
Approval Expires 10-31-92

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1. Investigation Identification			2. Firm Name	
Date 9/16/10	Inspector No. F10377	Daily Seq. No. #1	Veolia ES Technical Solutions	
3. Inspector Address 75 Hawthorne St San Francisco, CA 94105			4. Firm Address 5736 W. Jefferson Phoenix, AZ 85043	

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Toxic Substances Control Act.

Receipt of the document(s) and/or sample(s) described is hereby acknowledged:

No.	Description
0	12 Wipe Samples - Total PCBs
1	SOP for Mail Delivery of Ballasts
1	SOP for Labeling unmarked PCB Drums - Tucson
3	Site Maps
1	2007 files Inbound April, May, July

Optional:
Duplicate or split samples: Requested and Provided Not Requested

Certification
I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Inspector Signature <i>Chris Rollins</i>		Recipient Signature <i>Wayne Robinson</i>	
Name Chris Rollins		Name Wayne Robinson	
Title Envir Pro. Specialist	Date Signed 9/16/10	Title EHS Mgr	Date Signed 9-16-10

CHAIN OF CUSTODY RECORD

PROJ. NO.		PROJECT NAME				NO. OF CONTAINERS	REMARKS								
SAMPLERS: (Signature)															
DATE	TIME	MATRIX	COMP.	GRAB	SAMPLE IDENTIFICATION										
Veolia South Phoenix						Total 12 PBs									
Chris Rollins															
9/16/10	11:39	wipe		X	VEWS-1	1 vial	X								South Building 2
9/16/10	11:43	wipe		X	VEWS-2	1 vial	X								South Building 2 - near tot
9/16/10	11:50	wipe		X	VEWS-3	1 vial	X								Building 2 - East Side
9/16/10	11:55	wipe		✓	VEWS-4	1 vial	X								Near Pod B
9/16/10	12:05	wipe		✓	VEWS-5	1 vial	X								Near Pod C
9/16/10	12:26	wipe		✓	VEWS-6	1 vial	X								Building 3 - West Entrance
9/16/10	12:35	wipe		✓	VEWS-7	1 vial	X								Near N. Ramp Bldg 3
9/16/10	12:41	wipe		X	VEWS-8	1 vial	X								South of Building 3 - Old Processing
9/16/10	12:58	wipe		✓	VEWS-9	1 vial	X								Building 4 - East Entrance
9/16/10	1:03	wipe		✓	VEWS-10	1 vial	X								Building 4 - Outside East side
9/16/10	1:12	wipe		X	VEWS-11	1 vial	X								Building 4 - South side Pod
9/16/10	1:15	wipe		X	VEWS-12	1 vial	X								Building 4 - S. Side Pod
Relinquished by: (Signature)						Date / Time		Received by: (Signature)				Date / Time		Received by: (Signature)	
Chris Rollins						9/16/10 8:30am									
Relinquished by: (Signature)						Date / Time		Received by: (Signature)				Date / Time		Received by: (Signature)	
Received for Laboratory by: (Signature)						Date / Time		Temp.	Seals Intact (Y/N)			Condition / Remarks			

Veolia ES Technical Solutions
PCB Commercial Storage Facility



VEWS -4: Outside Bldg 2
Near Storage Pod B



VEWS-3: Outside Bldg 2's
Northeast Entrance



VEWS -1: Near Transformer
Decommissioning Area



VEWS -2: Directly
Beneath Liquid PCB Tote

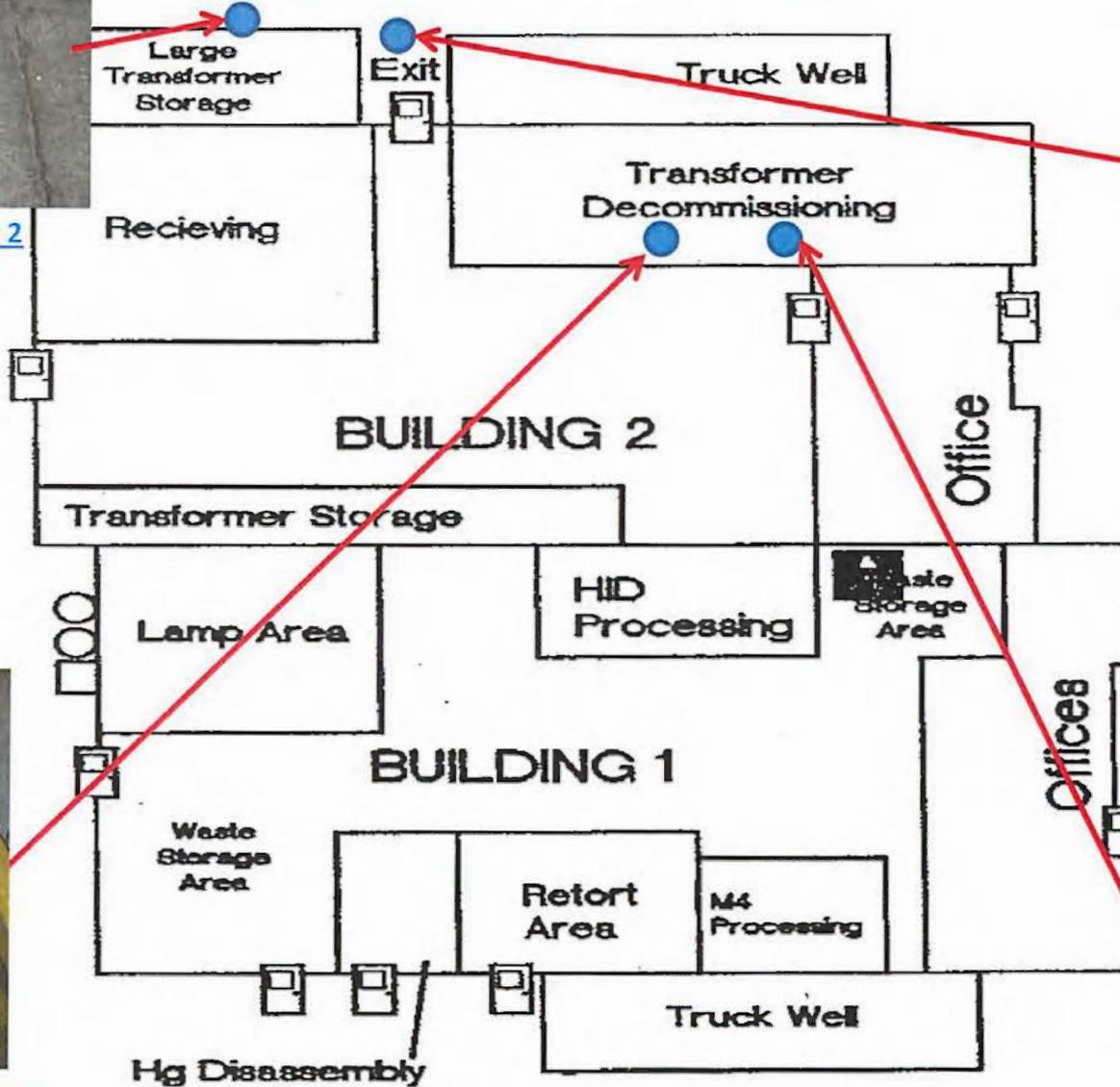
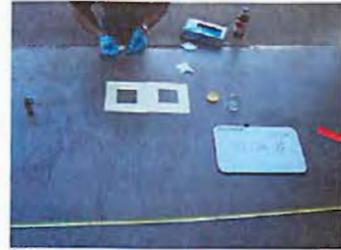


Figure 3: EPA's Approximate PCB Wipe
Sample Locations VESW-1 to 4 ("9/16/10")

Veolia ES Technical Solutions
PCB Commercial Storage Facility



VEWS-10: Bldg 4's
Northeast Entrance



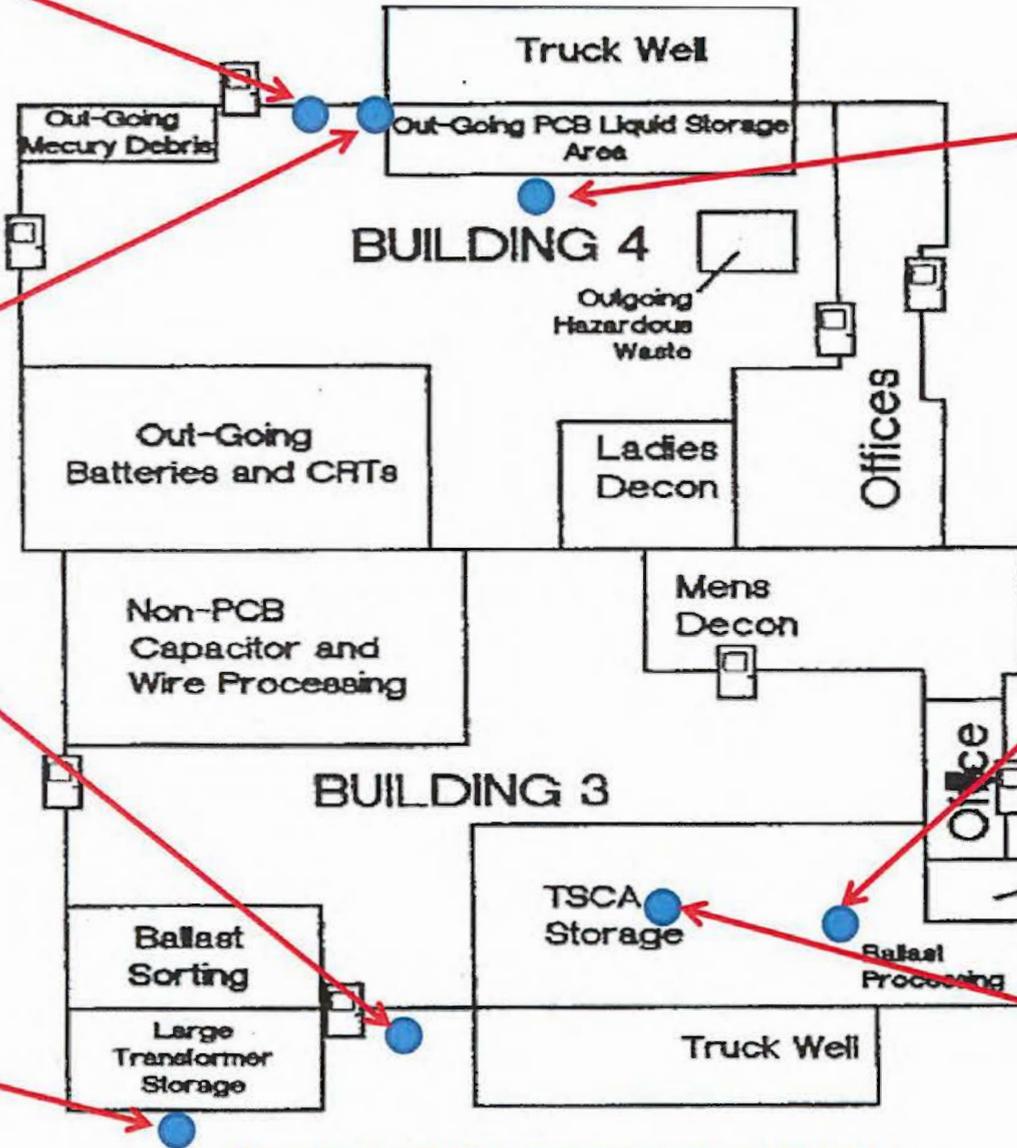
VEWS-9: Near Metal
Storage Pod



VEWS-6: Outside Bldg 3's
Northwest Entrance



VEWS-5: Near
Bldg 3's Pod C



VESW-11 & 12: West Side
of Metal Storage Pod



VEWS-8: Bldg 3's Old
PCB Processing Area



VEWS-7: Near the Ramp to
the TSCA Storage Area

Figure 4: EPA's Approximate PCB Wipe
Sample Locations VESW-5 to 12 ("9/16/10")

ATTACHMENT III

- A. Veolia Phoenix, AZ location Business Cards
- B. *ReferenceUSAGov* Business Query for Veolia (Phoenix)
- C. PCB Waste Handler Database Entry for Veolia (Phoenix)
- D. Veolia's Complete Services Webpage
- E. Veolia's Specific location Services for Phoenix, AZ
- F. PCB Waste Handler Database Entry for Veolia (WI)
- G. PCB Waste Handler Database Entry for Veolia (NJ)

**Veolia ES Technical Solutions, LLC
5736 W. Jefferson Street
Phoenix, AZ 85043**

**March 17, 2008 and
September 16, 2010**



Chip Humes

*Environmental Health & Safety Manager
Technical Solutions, North America*

Wayne Bulshawitz

Veolia ES Technical Solutions, L.L.C.
5736 W Jefferson Street, Phoenix, AZ 85043
tel: 602 233 2955 - toll free: 800 368 9095 - fax: 602 233 6883
cell: 602 725 7726 - chip.humes@veoliaes.com
www.VeoliaES.com

(602) 415-3023



James D. Harrison

*Operations Manager
Technical Solutions, North America*

Veolia ES Technical Solutions, L.L.C.
5736 W Jefferson Street, Phoenix, AZ 85043
tel: 602 233 2955 - direct: 602 415 3038 - fax: 602 278 0608
cell: 602 725 7727 - james.harrison@veoliaes.com
www.VeoliaES.com



D. Heath Hildebrand

*General Manager
Technical Solutions, North America*

Veolia ES Technical Solutions, L.L.C.
5736 W Jefferson Street, Phoenix, AZ 85043
tel: 602 233 2955 - fax: 602 278 0608
cell: 602 725 7727 - heath.hildebrand@veoliaes.com
www.VeoliaES.com



Wayne R. Bulsiewicz

*Environmental Health and Safety Manager
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Travis M. Barnum

Compliance Officer

Hazardous Waste Inspections and Compliance Unit

Arizona Department of Environmental Quality
1110 West Washington Street
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(602) 771-4213 • (800) 234-5677 • Fax (602) 771-4132
tb6@azdeq.gov • www.azdeq.gov



Jaclyn M. Palermo

Compliance Officer

Hazardous Waste Inspections and Compliance Unit

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Jessica E. Olmstead

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Hazardous Waste Inspections and Compliance Unit

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1110 West Washington Street
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Veolia Environmental Svc Phoenix, AZ

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Location Info [Collapse](#)

Business Name	Veolia Environmental Svc
Street Address	5736 W Jefferson St
City	Phoenix
State	AZ
ZIP Code	85043
County	Maricopa
Metro Area	Phoenix-Mesa, AZ
Phone	(602) 233-2955
Fax	(602) 415-3030
Toll Free Number	(800) 368-9095
Website	Not Available



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Corporate Tree

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Business Profile [Collapse](#)

Veolia Environmental Services is one of the largest environmental solutions organizations in North America. The company serves commercial, municipal, industrial and residential customers in the United States, Canada and the Bahamas. Its capabilities include bioremediation, landfill operations, liquid solidification, construction and demolition disposal, recycling, waste evaluations, bulk collection and material recovery. Veolia Environmental Services provides services for yard waste, portable toilets and restaurant and property management loads. The company also performs waste-to-energy activities. It works in partnership with communities to preserve valuable resources and extend landfill capacity through waste reduction, curbside collection and the processing and marketing of recyclables. Veolia Environmental Services has locations in various locations, such as in Phoenix.

Industry Profile [Collapse](#)

SIC Code	Descriptions
8731-11	Environmental & Ecological Services
NAICS Code	Description
54171131	Research & Development In Biotechnology
Franchise	Description
<i>None Available</i>	

Location Map [Expand](#)

Business Demographics

Collapse

Location Employees	61	Location Sales Volume	Not Available
Corporate Employees	Not Available	Corporate Sales Volume	Not Available
Type of Business	Private	Location Type	Branch
Parent Company	Veolia Environmental Svc	Foreign Parent	Not Available
EIN	Not Available	Fortune 1000 Ranking	Not Available
Credit Cards Accepted	Not Available	Last Updated On	November, 2009
Years in Database	19	Year Established	1987
Square Footage	40,000+	Number of PCs	30+ Pcs
IUSA Number	45-072-8225	Home Business	No
Credit Rating Score	A	Latitude / Longitude	33.446650 / -112.184800
Full Credit Report	Buy from Experian 		

Hours of Operation

Mon	Tue	Wed	Thu	Fri	Sat	Sun
Not Available						

Management Directory

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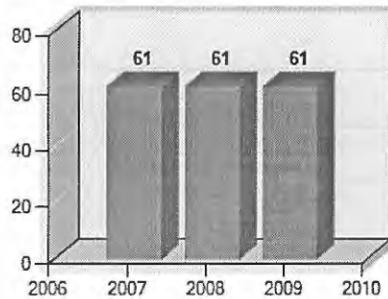
Business Expenditures

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Number of Employees



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PCB Waste Handlers Database

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EPA ID: AZ0000337360	State: ARIZONA	Region: 09
Facility Mailing Address:		
Name: Veolia Environmental		
Street: 5736 W. Jefferson St.		
City: Phoenix	State: AZ	Zip: 85043
Country: UNITED STATES		
Facility Location Address:		
Street: 5736 W. Jefferson St.		
City: Phoenix	State: AZ	Zip: 85043
Country: UNITED STATES		
Date Signed: 05/09/2000	Name of Owner Facility:	
Installation Contact: D. Heath Hildebrand (602)233-2955	Veolia ES Technical Solutions, LLC	
Type of PCB Activity		
Generator:Y		
Storer:Y		
Transporter:Y		
Disposer:N		
Research:		
Smelter:		
EPA ID: AZ0000337691	State: ARIZONA	Region: 09
Facility Mailing Address:		
Name: Diamond S. Trucking		
Street: P.O. Box A		
City: Joseph City	State: AZ	Zip: 86032
Country: UNITED STATES		
Facility Location Address:		
Street: 4585 Main Street		
City: Joseph City	State: AZ	Zip: 86032
Country: UNITED STATES		
Date Signed: 09/14/2004	Name of Owner Facility:	
Installation Contact: Brent Solomon (928)288-3583	Delwin Solomon	
Type of PCB Activity		
Generator:		
Storer:		
Transporter:Y		
Disposer:		
Research:		
Smelter:		
EPA ID: AZ0001897354	State: ARIZONA	Region: 09
Facility Mailing Address:		
Name: HAMPTON CENTER		
Street: 130 WEST HAMPTON STREET UNIT 3		
City: MESA	State: AZ	Zip: 85210
Country: UNITED STATES		
Facility Location Address:		
Street: 130 WEST HAMPTON AVE UNIT 3		
City: MESA	State: AZ	Zip: 85210
Country: UNITED STATES		
Date Signed: 03/05/1997	Name of Owner Facility:	
Installation Contact: STERNE, SCOTT (602)649-0100	PHOENIX DEMOLITION COMPANY INC	
Type of PCB Activity		
Generator:		
Storer:Y		
Transporter:Y		
Disposer:		
Research:		
Smelter:		



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Complete services for hazardous, nonhazardous and industrial waste disposal and recycling

Veolia Environmental Services Technical Solutions provides a complete range of services for customers needing disposal of hazardous, non-hazardous and industrial waste. Our nationwide network of service, treatment and disposal facilities can provide you with solvent recycling, incineration, laboratory chemical packaging, electronics recycling, fuels blending and on-site services.

For more information please fill in our Request for Information form or locate your Sales Rep.

Our mission statement is 'We deliver preferred solutions that protect people and improve the environment'. Our goal is that by doing this everyday we will achieve our vision, 'To be the company trusted by all to protect and improve the environment'.



Technical Solutions
Our business is environmental services.
Our passion is the environment.

Press Release - Chemical Safety Board
 Completes Investigation into West
 Carrollton Explosion



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 August 2010 Regulatory Update
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Turning waste into a resource



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Phoenix, AZ

The Veolia Environmental Services (VES) Phoenix, Arizona facility is an Electronics Recycling Group location. It is a strategically focused recovery and waste management facility that provides a variety of waste recycling services. Veolia ES-Phoenix operates a 96,000 square foot plant used to store, process and handle a variety of PCB and non-PCB equipment and mercury bearing waste. This facility is fully permitted in accordance with all applicable USEPA and ADEQ regulations governing the handling and disposal of PCB and mercury waste.

US EPA ID: AZ0000337360
State Regulatory Agency: <http://www.adeq.state.az.us>

Facility Type: Lighting and Electronics Recycling
Permitted TSDF
Regional Office
Sales Office

Manager: James Harrison
(800) 368-9095

Address: 5736 West Jefferson, Phoenix
Arizona 85043, US

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Services

- Battery Recycling
- Electrical Equipment Recycling
- Electronics Recycling
- Fluorescent Lamp Recycling and Light Bulb Recycling
- Mercury Waste Recycling



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EPA ID: WID982627531	State: WISCONSIN	Region: 05
Facility Mailing Address:		
Name: JOHNSEN AND JOHNSEN, INC		
Street: P O BOX 1443		
City: WAUSAU	State: WI	Zip: 54402-1443
Country: UNITED STATES		
Facility Location Address:		
Street: 1108 MCDONALD ST		
City: WAUSAU	State: WI	Zip: 54403
Country: UNITED STATES		
Date Signed: 04/14/1995	Name of Owner Facility:	
Installation Contact: JOHNSEN, CLIFFORD R. III (715)845-0188	MARATHON SAVINGS BANK	

Type of PCB Activity
Generator:
Storer:
Transporter:
Disposer:Y
Research:
Smelter:

EPA ID: WID982631467	State: WISCONSIN	Region: 05
Facility Mailing Address:		
Name: Miller Compressing Company		
Street: P.O. Box 369		
City: Milwaukee	State: WI	Zip: 53201
Country: UNITED STATES		
Facility Location Address:		
Street: 1640 Bruce Street		
City: Milwaukee	State: WI	Zip: 53201
Country: UNITED STATES		
Date Signed: 02/26/2004	Name of Owner Facility:	
Installation Contact: Larry Halverson (414)671-5980	Miller Compressing Company	

Type of PCB Activity
Generator:Y
Storer:
Transporter:
Disposer:
Research:
Smelter:

EPA ID: WID988566543	State: WISCONSIN	Region: 05
Facility Mailing Address:		
Name: Veolia ES Technical Solutions, LLC		
Street: 1275 Mineral Springs Dr.		
City: Port Washington	State: WI	Zip: 53074
Country: UNITED STATES		
Facility Location Address:		
Street: 1275 Mineral Springs Dr.		
City: Port Washington	State: WI	Zip: 53074
Country: UNITED STATES		
Date Signed: 06/27/1995	Name of Owner Facility:	
Installation Contact: Phillip Ditter (262)243-8908	Veolia ES Technical Solutions, LLC	

Type of PCB Activity
Generator:
Storer:Y
Transporter:Y
Disposer:
Research:
Smelter:

PCB Waste Handlers Database

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EPA ID: NJD079323044

State: NEW JERSEY

Region: 02

Facility Mailing Address:

Name: HOECHST CELANESE NEWARK TERM.

Street: 354 DOREMUS AVE

City: NEWARK

State: NJ

Zip: 07105

Country: UNITED STATES

Type of PCB Activity

Generator:Y

Storer:

Transporter:

Disposer:

Research:

Smelter:

Facility Location Address:

Street: 354 DOREMUS AVE

City: NEWARK

State: NJ

Zip: 07105

Country: UNITED STATES

Date Signed: 11/14/1996

Installation Contact:

BIEGER, KENNETH
(201)589-3484

Name of Owner Facility:

HOECHST CELANESE CHEM. GROUP

EPA ID: NJD080623366

State: NEW JERSEY

Region: 02

Facility Mailing Address:

Name: LINDEN-TET INTERCHANGE

Street: PO BOX 251

City: LINDEN

State: NJ

Zip: 07036

Country: UNITED STATES

Type of PCB Activity

Generator:Y

Storer:

Transporter:

Disposer:

Research:

Smelter:

Facility Location Address:

Street: 3200 WOOD AVE

City: LINDEN

State: NJ

Zip: 07036

Country: UNITED STATES

Date Signed: 04/03/1990

Installation Contact:

CERVENAK E J
(201)862-6500

Name of Owner Facility:

TRANSCONTINENTAL GAS PIPE LINE

EPA ID: NJD080631369

State: NEW JERSEY

Region: 02

Facility Mailing Address:

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

Street: 1 EDEN LANE

City: FLANDERS

State: NJ

Zip: 07836

Country: UNITED STATES

Type of PCB Activity

Generator:

Storer:

Transporter:Y

Disposer:

Research:

Smelter:

Facility Location Address:

Street: 1 EDEN LANE

City: FLANDERS

State: NJ

Zip: 07836

Country: UNITED STATES

Date Signed: 10/12/1995

Installation Contact:

Thomas M. Baker, Director, Enviro
(973)691-7330

Name of Owner Facility:

Veolia ES Technical Solutions, L.L.C.