ATTACHMENT IV

A. Analytical Testing Results: Veolia PCB Wipe Samples – (3/17/08)
B. Analytical Testing Results: Veolia PCB Wipe Samples – (9/16/10)
C. Veolia's Commercial PCB Storage and Lighting Ballasts Recycling Approval
D. ADEQ's March 17, 2008, Veolia (Phoenix, AZ) Hazardous Waste Inspection Report.
E. Veolia's PCB CA/FO (Docket # TSCA-9-2003-0006) dated September 26, 2003.

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

March 17, 2008 and
September 16, 2010

United States Environmental Protection Agency
Region 9 Laboratory
1337 S. 46th Street Building 201
Richmond, CA 94804

Subject: **Analytical Testing Results - Project R08R02**
SDG: 08084B

From: **Brenda Bettencourt, Director**
EPA Region 9 Laboratory
MTS-2

To: **Christopher Rollins**
RCRA Enforcement Office
WST-3

Attached are the results from the analysis of samples from the **Phoenix Area PCB Inspections - 2008** project. These data have been reviewed in accordance with EPA Region 9 Laboratory policy.

A full documentation package for these data, including raw data and sample custody documentation, is on file at the EPA Region 9 Laboratory. If you would like to request additional review and/or validation of the data, please contact Eugenia McNaughton at the Region 9 Quality Assurance Office.

If you have any questions, please ask for Richard Bauer, the Lab Project Manager at (510)412-2300.

Analyses included in this report:

PCB Aroclors by GC/ECD	PCB Aroclors by GC/ECD

United States Environmental Protection Agency
Region 9 Laboratory

1337 S. 46th Street, Building 201, Richmond, CA 94804
Phone:(510) 412-2300 Fax:(510) 412-2302

Project Manager:	Christopher Rollins	**RCRA Enforcement Office**		**SDG:**	08084B
Project Number:	R08R02	**75 Hawthorne Street**		**Reported:**	05/23/08 15:49
Project:	Phoenix Area PCB Inspections - 2008	**San Francisco CA, 94105**			

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Collected	Date Received
VESW-1	0803059-01	Wipe	03/17/08 14:37	03/24/08 10:00
VESW-2	0803059-02	Wipe	03/17/08 14:48	03/24/08 10:00
VESW-3	0803059-03	Wipe	03/17/08 15:00	03/24/08 10:00
VESW-4	0803059-04	Wipe	03/17/08 15:09	03/24/08 10:00
VESW-5	0803059-05	Wipe	03/17/08 15:15	03/24/08 10:00
VESW-6	0803059-06	Wipe	03/17/08 15:20	03/24/08 10:00
VESW-7	0803059-07	Wipe	03/17/08 15:30	03/24/08 10:00
VESW-8	0803059-08	Wipe	03/17/08 15:38	03/24/08 10:00
VESW-9	0803059-09	Wipe	03/17/08 15:40	03/24/08 10:00
VESW-10	0803059-10	Wipe	03/17/08 15:45	03/24/08 10:00
EPSW-1	0803059-11	Wipe	03/18/08 14:48	03/24/08 10:00
EPSW-2	0803059-12	Wipe	03/18/08 14:54	03/24/08 10:00
EPSW-3	0803059-13	Wipe	03/18/08 14:58	03/24/08 10:00
EPSW-4	0803059-14	Wipe	03/18/08 15:45	03/24/08 10:00
EPSW-5	0803059-15	Wipe	03/18/08 15:48	03/24/08 10:00
EPSW-6	0803059-16	Wipe	03/18/08 15:54	03/24/08 10:00
EPSW-7	0803059-17	Wipe	03/18/08 16:05	03/24/08 10:00
LRSW-1	0803059-18	Wipe	03/19/08 12:40	03/24/08 10:00
LRSW-2	0803059-19	Wipe	03/19/08 12:44	03/24/08 10:00
LRSW-3	0803059-20	Wipe	03/19/08 12:50	03/24/08 10:00
LRSW-4	0803059-21	Wipe	03/19/08 12:52	03/24/08 10:00
LRSW-5	0803059-22	Wipe	03/19/08 13:21	03/24/08 10:00
LRSW-6	0803059-23	Wipe	03/19/08 13:23	03/24/08 10:00
LRSW-7	0803059-24	Wipe	03/19/08 13:27	03/24/08 10:00
LRSW-8	0803059-25	Wipe	03/19/08 13:31	03/24/08 10:00
LRSW-9	0803059-26	Wipe	03/19/08 13:34	03/24/08 10:00
LRSW-10	0803059-27	Wipe	03/19/08 13:47	03/24/08 10:00
LRSW-11	0803059-28	Wipe	03/19/08 13:50	03/24/08 10:00

Samples were wipes submitted to the laboratory in 40 ml vials. Surrogate spiking solution was added to each wipe prior to extraction. Each wipe was then extracted with 20 ml of hexane. Sample extracts were treated with sulfuric acid to destroy interferences. Traces of sulfuric acid were removed with water and the hexane extract was then dried with anhydrous sodium sulfate prior to analysis.

Results are reported in units of ug/100 cm2 based on the sampler's verbal indication that 100 cm2 area of surfaced was wiped for each sample.

Different aroclor mixtures can contain common PCB congeners. For samples containing more than one aroclor, such as where both aroclor 1254 and 1260 are reported, some double reporting may occur due to common congeners.

Sample 0803059-26: Sample contains PCB congeners common to both Aroclor 1232 and 1242, but the peak profile of the sample chromatogram is not a close match to either Aroclor; Aroclor 1232 is the closest match.

United States Environmental Protection Agency
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Project Manager:	Christopher Rollins	**RCRA Enforcement Office**	**SDG:** 08084B
Project Number:	R08R02	**75 Hawthorne Street**	**Reported:** 05/23/08 15:49
Project:	Phoenix Area PCB Inspections - 2008	**San Francisco CA, 94105**	

Sample Results

Analyte	Reanalysis / Extract	Result	Qualifiers / Comments	Quantitation Limit	Units	Batch	Prepared	Analyzed	Method
Lab ID: 0803059-01									**Wipe - Sampled: 03/17/08 14:37**
Sample ID: VESW-1									**Polychlorinated Biphenyls by EPA Method 8082**
Aroclor 1016		ND	U	0.4	ug/100cm²	B8D0003	04/01/08	04/28/08	8082/SOP335
Aroclor 1221		ND	U	0.8	"	"	"	"	8082/SOP335
Aroclor 1232		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1242		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1248		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor-1254	RE1	83		8.4	"	"	"	05/02/08	8082/SOP335
Aroclor-1260	RE1	200		8.4	"	"	"	"	8082/SOP335
Aroclor 1262		ND	U	0.4	"	"	"	04/28/08	8082/SOP335
Surrogate: Tetrachloro-m-xylene		*0.129*		65 %	*57-114%*	"	"	"	
Surrogate: Decachlorobiphenyl		*0.153*		76 %	*40-190%*	"	"	"	
Lab ID: 0803059-02									**Wipe - Sampled: 03/17/08 14:48**
Sample ID: VESW-2									**Polychlorinated Biphenyls by EPA Method 8082**
Aroclor 1016		ND	U	0.4	ug/100cm²	B8D0003	04/01/08	04/28/08	8082/SOP335
Aroclor 1221		ND	U	0.8	"	"	"	"	8082/SOP335
Aroclor 1232		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1242		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1248		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor-1254	RE1	37		4.2	"	"	"	05/02/08	8082/SOP335
Aroclor 1260	RE1	58		4.2	"	"	"	"	8082/SOP335
Aroclor 1262		ND	U	0.4	"	"	"	04/28/08	8082/SOP335
Surrogate: Tetrachloro-m-xylene		*0.113*		57 %	*57-114%*	"	"	"	
Surrogate: Decachlorobiphenyl		*0.144*		72 %	*40-190%*	"	"	"	
Lab ID: 0803059-03									**Wipe - Sampled: 03/17/08 15:00**
Sample ID: VESW-3									**Polychlorinated Biphenyls by EPA Method 8082**
Aroclor 1016		ND	U	0.4	ug/100cm²	B8D0003	04/01/08	04/28/08	8082/SOP335
Aroclor 1221		ND	U	0.8	"	"	"	"	8082/SOP335
Aroclor 1232		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1242		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1248		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1254		18		0.4	"	"	"	"	8082/SOP335
Aroclor-1260	RE1	39		4.2	"	"	"	05/02/08	8082/SOP335
Aroclor 1262		ND	U	0.4	"	"	"	04/28/08	8082/SOP335
Surrogate: Tetrachloro-m-xylene		*0.122*		61 %	*57-114%*	"	"	"	
Surrogate: Decachlorobiphenyl		*0.146*		73 %	*40-190%*	"	"	"	
Lab ID: 0803059-04									**Wipe - Sampled: 03/17/08 15:09**
Sample ID: VESW-4									**Polychlorinated Biphenyls by EPA Method 8082**
Aroclor 1016		ND	U	0.4	ug/100cm²	B8D0003	04/01/08	04/28/08	8082/SOP335
Aroclor 1221		ND	U	0.8	"	"	"	"	8082/SOP335
Aroclor 1232		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1242		ND	U	0.4	"	"	"	"	8082/SOP335

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Project Manager:	Christopher Rollins	**RCRA Enforcement Office**		**SDG:**	08084B
Project Number:	R08R02	**75 Hawthorne Street**		**Reported:**	05/23/08 15:49
Project:	Phoenix Area PCB Inspections - 2008	**San Francisco CA, 94105**			

Sample Results

Analyte	Reanalysis / Extract	Result	Qualifiers / Comments	Quantitation Limit	Units	Batch	Prepared	Analyzed	Method
Lab ID: 0803059-04									**Wipe - Sampled: 03/17/08 15:09**
Sample ID: VESW-4									**Polychlorinated Biphenyls by EPA Method 8082**
Aroclor 1248		ND	U	0.4	ug/100cm²	B8D0003	04/01/08	04/28/08	8082/SOP335
Aroclor-1254		4.8		0.4	"	"	"	"	8082/SOP335
Aroclor-1260		5.1		0.4	"	"	"	"	8082/SOP335
Aroclor 1262		ND	U	0.4	"	"	"	"	8082/SOP335
Surrogate: Tetrachloro-m-xylene		*0.139*		69 %	*57-114%*	"	"	"	
Surrogate: Decachlorobiphenyl		*0.153*		76 %	*40-190%*	"	"	"	
Lab ID: 0803059-05									**Wipe - Sampled: 03/17/08 15:15**
Sample ID: VESW-5									**Polychlorinated Biphenyls by EPA Method 8082**
Aroclor 1016		ND	U	0.4	ug/100cm²	B8D0003	04/01/08	04/28/08	8082/SOP335
Aroclor 1221		ND	U	0.8	"	"	"	"	8082/SOP335
Aroclor 1232		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1242		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1248		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor-1254		7.9		0.4	"	"	"	"	8082/SOP335
Aroclor-1260		9		0.4	"	"	"	"	8082/SOP335
Aroclor 1262		ND	U	0.4	"	"	"	"	8082/SOP335
Surrogate: Tetrachloro-m-xylene		*0.136*		68 %	*57-114%*	"	"	"	
Surrogate: Decachlorobiphenyl		*0.158*		79 %	*40-190%*	"	"	"	
Lab ID: 0803059-06									**Wipe - Sampled: 03/17/08 15:20**
Sample ID: VESW-6									**Polychlorinated Biphenyls by EPA Method 8082**
Aroclor 1016		ND	U	0.4	ug/100cm²	B8D0003	04/01/08	04/28/08	8082/SOP335
Aroclor 1221		ND	U	0.8	"	"	"	"	8082/SOP335
Aroclor 1232		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1242		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1248		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor-1254		6.9		0.4	"	"	"	"	8082/SOP335
Aroclor-1260		7		0.4	"	"	"	"	8082/SOP335
Aroclor 1262		ND	U	0.4	"	"	"	"	8082/SOP335
Surrogate: Tetrachloro-m-xylene		*0.141*		70 %	*57-114%*	"	"	"	
Surrogate: Decachlorobiphenyl		*0.162*		81 %	*40-190%*	"	"	"	
Lab ID: 0803059-07									**Wipe - Sampled: 03/17/08 15:30**
Sample ID: VESW-7									**Polychlorinated Biphenyls by EPA Method 8082**
Aroclor 1016		ND	U	0.4	ug/100cm²	B8D0003	04/01/08	04/28/08	8082/SOP335
Aroclor 1221		ND	U	0.8	"	"	"	"	8082/SOP335
Aroclor 1232		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1242		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1248		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor-1254	RE1	34		4.2	"	"	"	05/02/08	8082/SOP335
Aroclor-1260	RE1	84		4.2	"	"	"	"	8082/SOP335
Aroclor 1262		ND	U	0.4	"	"	"	04/28/08	8082/SOP335

United States Environmental Protection Agency
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Phone:(510) 412-2300 Fax:(510) 412-2302

Project Manager:	Christopher Rollins	**RCRA Enforcement Office**	**SDG:** 08084B
Project Number:	R08R02	**75 Hawthorne Street**	**Reported:** 05/23/08 15:49
Project:	Phoenix Area PCB Inspections - 2008	**San Francisco CA, 94105**	

Sample Results

Analyte	Reanalysis / Extract	Result	Qualifiers / Comments	Quantitation Limit	Units	Batch	Prepared	Analyzed	Method
Lab ID:	**0803059-07**								**Wipe - Sampled: 03/17/08 15:30**
Sample ID:	**VESW-7**								**Polychlorinated Biphenyls by EPA Method 8082**
Surrogate: Tetrachloro-m-xylene		*0.119*		59 %	*57-114%*	*B8D0003*	*04/01/08*	*04/28/08*	
Surrogate: Decachlorobiphenyl		*0.154*		77 %	*40-190%*	"	"	"	
Lab ID:	**0803059-08**								**Wipe - Sampled: 03/17/08 15:38**
Sample ID:	**VESW-8**								**Polychlorinated Biphenyls by EPA Method 8082**
Aroclor 1016		ND	U	0.4	ug/100cm²	B8D0003	04/01/08	04/28/08	8082/SOP335
Aroclor 1221		ND	U	0.8	"	"	"	"	8082/SOP335
Aroclor 1232		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1242		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1248		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1254		0.8		0.4	"	"	"	"	8082/SOP335
Aroclor-1260		1.3		0.4	"	"	"	"	8082/SOP335
Aroclor 1262		ND	U	0.4	"	"	"	"	8082/SOP335
Surrogate: Tetrachloro-m-xylene		*0.148*		74 %	*57-114%*	"	"	"	
Surrogate: Decachlorobiphenyl		*0.172*		86 %	*40-190%*	"	"	"	
Lab ID:	**0803059-09**								**Wipe - Sampled: 03/17/08 15:40**
Sample ID:	**VESW-9**								**Polychlorinated Biphenyls by EPA Method 8082**
Aroclor 1016		ND	U	0.4	ug/100cm²	B8D0003	04/01/08	04/29/08	8082/SOP335
Aroclor 1221		ND	U	0.8	"	"	"	"	8082/SOP335
Aroclor 1232		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1242		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1248		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1254		2.4		0.4	"	"	"	"	8082/SOP335
Aroclor 1260		7.8		0.4	"	"	"	"	8082/SOP335
Aroclor 1262		ND	U	0.4	"	"	"	"	8082/SOP335
Surrogate: Tetrachloro-m-xylene		*0.14*		70 %	*57-114%*	"	"	"	
Surrogate: Decachlorobiphenyl		*0.157*		78 %	*40-190%*	"	"	"	
Lab ID:	**0803059-10**								**Wipe - Sampled: 03/17/08 15:45**
Sample ID:	**VESW-10**								**Polychlorinated Biphenyls by EPA Method 8082**
Aroclor 1016		ND	U	0.4	ug/100cm²	B8D0003	04/01/08	05/02/08	8082/SOP335
Aroclor 1221		ND	U	0.8	"	"	"	"	8082/SOP335
Aroclor 1232		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1242		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1248		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1254		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1260		ND	U	0.4	"	"	"	"	8082/SOP335
Aroclor 1262		ND	U	0.4	"	"	"	"	8082/SOP335
Surrogate: Tetrachloro-m-xylene		*0.144*		72 %	*57-114%*	"	"	"	
Surrogate: Decachlorobiphenyl		*0.157*		78 %	*40-190%*	"	"	"	
Lab ID:	**0803059-11**								**Wipe - Sampled: 03/18/08 14:48**

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Project Manager: Christopher Rollins	**RCRA Enforcement Office**	**SDG:** 08084B	
Project Number: R08R02	**75 Hawthorne Street**	**Reported:** 05/23/08 15:49	
Project: Phoenix Area PCB Inspections - 2008	**San Francisco CA, 94105**		

Quality Control

Analyte	Result	Qualifiers / Comments	Quantitation Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch B8D0003 - 3580A Waste Dilution - PCBs									**Prepared: 04/01/08 Analyzed: 04/28/08**	
									Polychlorinated Biphenyls by EPA Method 8082 - Quality Control	
Blank (B8D0003-BLK1)										
Aroclor 1016	ND	U	0.4	ug/100cm²						
Aroclor 1221	ND	U	0.8	"						
Aroclor 1232	ND	U	0.4	"						
Aroclor 1242	ND	U	0.4	"						
Aroclor 1248	ND	U	0.4	"						
Aroclor 1254	ND	U	0.4	"						
Aroclor 1260	ND	U	0.4	"						
Aroclor 1262	ND	U	0.4	"						
Surrogate: Tetrachloro-m-xylene	*0.137*			"	*0.200*		68	*57-114*		
Surrogate: Decachlorobiphenyl	*0.141*			"	*0.200*		70	*40-190*		
Blank (B8D0003-BLK2)										
Aroclor 1016	ND	U	0.4	ug/100cm²						
Aroclor 1221	ND	U	0.8	"						
Aroclor 1232	ND	U	0.4	"						
Aroclor 1242	ND	U	0.4	"						
Aroclor 1248	ND	U	0.4	"						
Aroclor 1254	ND	U	0.4	"						
Aroclor 1260	ND	U	0.4	"						
Aroclor 1262	ND	U	0.4	"						
Surrogate: Tetrachloro-m-xylene	*0.133*			"	*0.200*		66	*57-114*		
Surrogate: Decachlorobiphenyl	*0.144*			"	*0.200*		72	*40-190*		
LCS (B8D0003-BS1)										
Aroclor-1016	0.98		0.4	ug/100cm²	1.00		98	39-167		
Aroclor-1260	1.12		0.4	"	1.00		112	38-177		
Surrogate: Tetrachloro-m-xylene	*0.142*			"	*0.200*		71	*57-114*		
Surrogate: Decachlorobiphenyl	*0.155*			"	*0.200*		78	*40-190*		
LCS (B8D0003-BS2)										
Aroclor-1016	0.919		0.4	ug/100cm²	1.00		92	39-167		
Aroclor 1260	1.07		0.4	"	1.00		107	38-177		
Surrogate: Tetrachloro-m-xylene	*0.138*			"	*0.200*		69	*57-114*		
Surrogate: Decachlorobiphenyl	*0.146*			"	*0.200*		73	*40-190*		

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Project Manager:	Christopher Rollins	**RCRA Enforcement Office**		**SDG:**	08084B
Project Number:	R08R02	**75 Hawthorne Street**		**Reported:**	05/23/08 15:49
Project:	Phoenix Area PCB Inspections - 2008	**San Francisco CA, 94105**			

Qualifiers and Comments

J	The reported result for this analyte should be considered an estimated value.
C4	The calibration verification check did not meet % difference criteria for this analyte.
C1	The reported concentration for this analyte is below the quantitation limit.
A-01	Best Aroclor match to sample chromatogram.
U	Not Detected
NR	Not Reported
RE1, RE2, etc:	Result is from a sample re-analysis.

United States Environmental Protection Agency
Region 9 Laboratory

1337 S. 46th Street Building 201
Richmond, CA 94804

Date: 10/18/2010

Subject: Analytical Testing Results - Project R10R04
SDG: 10264A

From: Brenda Bettencourt, Director
EPA Region 9 Laboratory
MTS-2

To: Christopher Rollins
RCRA Enforcement Office
WST-3

Attached are the results from the analysis of samples from the **Phoenix Area 2010 PCB Inspections** project. These data have been reviewed in accordance with EPA Region 9 Laboratory policy.

A full documentation package for these data, including raw data and sample custody documentation, is on file at the EPA Region 9 Laboratory. If you would like to request additional review and/or validation of the data, please contact Eugenia McNaughton at the Region 9 Quality Assurance Office.

If you have any questions, please ask for Richard Bauer, the Lab Project Manager at (510)412-2300.

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PCB Aroclors by GC/ECD	PCB Aroclors by GC/ECD

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1337 S. 46th Street, Building 201, Richmond, CA 94804
Phone:(510) 412-2300 Fax:(510) 412-2302

Project Manager: Christopher Rollins	**RCRA Enforcement Office**	**SDG:** 10264A
Project Number: R10R04	**75 Hawthorne Street**	**Reported:** 10/18/10 10:37
Project: Phoenix Area 2010 PCB Inspections	**San Francisco CA, 94105**	

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Collected	Date Received
VEWS-1	1009037-01	Wipe	09/16/10 11:39	09/20/10 15:05
VEWS-2	1009037-02	Wipe	09/16/10 11:43	09/20/10 15:05
VEWS-3	1009037-03	Wipe	09/16/10 11:50	09/20/10 15:05
VEWS-4	1009037-04	Wipe	09/16/10 11:55	09/20/10 15:05
VEWS-5	1009037-05	Wipe	09/16/10 12:05	09/20/10 15:05
VEWS-6	1009037-06	Wipe	09/16/10 12:26	09/20/10 15:05
VEWS-7	1009037-07	Wipe	09/16/10 12:35	09/20/10 15:05
VEWS-8	1009037-08	Wipe	09/16/10 12:41	09/20/10 15:05
VEWS-9	1009037-09	Wipe	09/16/10 12:58	09/20/10 15:05
VEWS-10	1009037-10	Wipe	09/16/10 13:03	09/20/10 15:05
VEWS-11	1009037-11	Wipe	09/16/10 13:12	09/20/10 15:05
VEWS-12	1009037-12	Wipe	09/16/10 13:15	09/20/10 15:05

SDG ID 10264A

Samples were received at 23 degree C, which is above the recommended temperature range of 0 to ≤ 6 degree C. The temperature will have no impact on PCB wipe samples. Therefore, data is not qualified.

Work Order(s)

1009037

United States Environmental Protection Agency
Region 9 Laboratory
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Project Number: R10R04	**75 Hawthorne Street**	**Reported:** 10/18/10 10:37
Project: Phoenix Area 2010 PCB Inspections	**San Francisco CA, 94105**	

Sample Results

Analyte	Reanalysis / Extract	Result	Qualifiers / Comments	Quantitation Limit	Units	Batch	Prepared	Analyzed	Method
Lab ID: 1009037-01									**Wipe - Sampled: 09/16/10 11:39**
Sample ID: VEWS-1									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1016		ND	U	0.4	ug/100cm²	B0I0114	09/22/10	09/23/10	8082A/SOP335
Aroclor 1221		ND	U	0.8	"	"	"	"	8082A/SOP335
Aroclor 1232		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1242		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1248		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1254		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1260		7.6		0.4	"	"	"	"	8082A/SOP335
Aroclor 1262		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1268		ND	U	0.4	"	"	"	"	8082A/SOP335
Surrogate: Tetrachloro-m-xylene			99 %	*57-114%*		"	"	"	
Surrogate: Decachlorobiphenyl			90 %	*40-190%*		"	"	"	
Lab ID: 1009037-02									**Wipe - Sampled: 09/16/10 11:43**
Sample ID: VEWS-2									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1016		ND	U	0.4	ug/100cm²	B0I0114	09/22/10	09/23/10	8082A/SOP335
Aroclor 1221		ND	U	0.8	"	"	"	"	8082A/SOP335
Aroclor 1232		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1242		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1248		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1254		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1260	RE1	27		0.8	"	"	"	09/24/10	8082A/SOP335
Aroclor 1262		ND	U	0.4	"	"	"	09/23/10	8082A/SOP335
Aroclor 1268		5.4		0.4	"	"	"	"	8082A/SOP335
Surrogate: Tetrachloro-m-xylene			101 %	*57-114%*		"	"	"	
Surrogate: Decachlorobiphenyl			94 %	*40-190%*		"	"	"	
Lab ID: 1009037-03									**Wipe - Sampled: 09/16/10 11:50**
Sample ID: VEWS-3									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1016		ND	U	0.4	ug/100cm²	B0I0114	09/22/10	09/23/10	8082A/SOP335
Aroclor 1221		ND	U	0.8	"	"	"	"	8082A/SOP335
Aroclor 1232		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1242		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1248		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1254		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor-1260	RE1	150		4	"	"	"	09/24/10	8082A/SOP335
Aroclor 1262		ND	U	0.4	"	"	"	09/23/10	8082A/SOP335
Aroclor 1268		ND	U	0.4	"	"	"	"	8082A/SOP335
Surrogate: Tetrachloro-m-xylene			103 %	*57-114%*		"	"	"	

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Project Manager: Christopher Rollins	**RCRA Enforcement Office**	**SDG:** 10264A
Project Number: R10R04	**75 Hawthorne Street**	**Reported:** 10/18/10 10:37
Project: Phoenix Area 2010 PCB Inspections	**San Francisco CA, 94105**	

Sample Results

Analyte	Reanalysis / Extract	Result	Qualifiers / Comments	Quantitation Limit	Units	Batch	Prepared	Analyzed	Method
Lab ID: 1009037-03									**Wipe - Sampled: 09/16/10 11:50**
Sample ID: VEWS-3									**Polychlorinated Biphenyls by EPA Method 8082A**
Surrogate: Decachlorobiphenyl			103 %	*40-190%*		*B0I0114*	*09/22/10*	*09/23/10*	
Lab ID: 1009037-04									**Wipe - Sampled: 09/16/10 11:55**
Sample ID: VEWS-4									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1016		ND	U	0.4	ug/100cm²	B0I0114	09/22/10	09/23/10	8082A/SOP335
Aroclor 1221		ND	U	0.8	"	"	"	"	8082A/SOP335
Aroclor 1232		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1242		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1248		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1254		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1260		1.5		0.4	"	"	"	"	8082A/SOP335
Aroclor 1262		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1268		ND	U	0.4	"	"	"	"	8082A/SOP335
Surrogate: Tetrachloro-m-xylene			103 %	*57-114%*		"	"	"	
Surrogate: Decachlorobiphenyl			90 %	*40-190%*		"	"	"	
Lab ID: 1009037-05									**Wipe - Sampled: 09/16/10 12:05**
Sample ID: VEWS-5									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1016		ND	U	0.4	ug/100cm²	B0I0114	09/22/10	09/23/10	8082A/SOP335
Aroclor 1221		ND	U	0.8	"	"	"	"	8082A/SOP335
Aroclor 1232		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1242		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1248		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1254		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1260		4.5		0.4	"	"	"	"	8082A/SOP335
Aroclor 1262		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1268		ND	U	0.4	"	"	"	"	8082A/SOP335
Surrogate: Tetrachloro-m-xylene			95 %	*57-114%*		"	"	"	
Surrogate: Decachlorobiphenyl			77 %	*40-190%*		"	"	"	
Lab ID: 1009037-06									**Wipe - Sampled: 09/16/10 12:26**
Sample ID: VEWS-6									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1016		0.4	C1, J	0.4	ug/100cm²	B0I0114	09/22/10	09/23/10	8082A/SOP335
Aroclor 1221		ND	U	0.8	"	"	"	"	8082A/SOP335
Aroclor 1232		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1242		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1248		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1254		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1260		1.5		0.4	"	"	"	"	8082A/SOP335

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Project Manager: Christopher Rollins	**RCRA Enforcement Office**	**SDG:** 10264A
Project Number: R10R04	**75 Hawthorne Street**	**Reported:** 10/18/10 10:37
Project: Phoenix Area 2010 PCB Inspections	**San Francisco CA, 94105**	

Sample Results

Analyte	Reanalysis / Extract	Result	Qualifiers / Comments	Quantitation Limit	Units	Batch	Prepared	Analyzed	Method
Lab ID: 1009037-06									**Wipe - Sampled: 09/16/10 12:26**
Sample ID: VEWS-6									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1262		ND	U	0.4	ug/100cm²	B0I0114	09/22/10	09/23/10	8082A/SOP335
Aroclor 1268		ND	U	0.4	"	"	"	"	8082A/SOP335
Surrogate: Tetrachloro-m-xylene			101 %	*57-114%*		"	"	"	
Surrogate: Decachlorobiphenyl			97 %	*40-190%*		"	"	"	
Lab ID: 1009037-07									**Wipe - Sampled: 09/16/10 12:35**
Sample ID: VEWS-7									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1016		1.0		0.4	ug/100cm²	B0I0114	09/22/10	09/23/10	8082A/SOP335
Aroclor 1221		ND	U	0.8	"	"	"	"	8082A/SOP335
Aroclor 1232		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1242		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1248		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1254		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1260		1.7		0.4	"	"	"	"	8082A/SOP335
Aroclor 1262		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1268		ND	U	0.4	"	"	"	"	8082A/SOP335
Surrogate: Tetrachloro-m-xylene			99 %	*57-114%*		"	"	"	
Surrogate: Decachlorobiphenyl			92 %	*40-190%*		"	"	"	
Lab ID: 1009037-08									**Wipe - Sampled: 09/16/10 12:41**
Sample ID: VEWS-8									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1016		0.3	C1, J	0.4	ug/100cm²	B0I0114	09/22/10	09/23/10	8082A/SOP335
Aroclor 1221		ND	U	0.8	"	"	"	"	8082A/SOP335
Aroclor 1232		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1242		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1248		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1254		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1260		1.5		0.4	"	"	"	"	8082A/SOP335
Aroclor 1262		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1268		ND	U	0.4	"	"	"	"	8082A/SOP335
Surrogate: Tetrachloro-m-xylene			100 %	*57-114%*		"	"	"	
Surrogate: Decachlorobiphenyl			94 %	*40-190%*		"	"	"	
Lab ID: 1009037-09									**Wipe - Sampled: 09/16/10 12:58**
Sample ID: VEWS-9									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1016		ND	U	0.4	ug/100cm²	B0I0114	09/22/10	09/24/10	8082A/SOP335
Aroclor 1221		ND	U	0.8	"	"	"	"	8082A/SOP335
Aroclor 1232		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1242		ND	U	0.4	"	"	"	"	8082A/SOP335

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Project Manager:	Christopher Rollins	**RCRA Enforcement Office**	**SDG:** 10264A
Project Number:	R10R04	**75 Hawthorne Street**	**Reported:** 10/18/10 10:37
Project:	Phoenix Area 2010 PCB Inspections	**San Francisco CA, 94105**	

Sample Results

Analyte	Reanalysis / Extract	Result	Qualifiers / Comments	Quantitation Limit	Units	Batch	Prepared	Analyzed	Method
Lab ID: 1009037-09									**Wipe - Sampled: 09/16/10 12:58**
Sample ID: VEWS-9									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1248		ND	U	0.4	ug/100cm²	B0I0114	09/22/10	09/24/10	8082A/SOP335
Aroclor 1254		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1260		1.1		0.4	"	"	"	"	8082A/SOP335
Aroclor 1262		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1268		ND	U	0.4	"	"	"	"	8082A/SOP335
Surrogate: Tetrachloro-m-xylene			%	*57-114%*		"	"	"	
Surrogate: Decachlorobiphenyl			94 %	*40-190%*		"	"	"	
Lab ID: 1009037-10									**Wipe - Sampled: 09/16/10 13:03**
Sample ID: VEWS-10									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1016		0.3	C1, J	0.4	ug/100cm²	B0I0114	09/22/10	09/24/10	8082A/SOP335
Aroclor 1221		ND	U	0.8	"	"	"	"	8082A/SOP335
Aroclor 1232		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1242		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1248		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1254		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1260		2.3		0.4	"	"	"	"	8082A/SOP335
Aroclor 1262		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1268		ND	U	0.4	"	"	"	"	8082A/SOP335
Surrogate: Tetrachloro-m-xylene			101 %	*57-114%*		"	"	"	
Surrogate: Decachlorobiphenyl			96 %	*40-190%*		"	"	"	
Lab ID: 1009037-11									**Wipe - Sampled: 09/16/10 13:12**
Sample ID: VEWS-11									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1016		ND	U	0.4	ug/100cm²	B0I0114	09/22/10	09/24/10	8082A/SOP335
Aroclor 1221		ND	U	0.8	"	"	"	"	8082A/SOP335
Aroclor 1232		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1242		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1248		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1254		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1260		1.0		0.4	"	"	"	"	8082A/SOP335
Aroclor 1262		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1268		ND	U	0.4	"	"	"	"	8082A/SOP335
Surrogate: Tetrachloro-m-xylene			102 %	*57-114%*		"	"	"	
Surrogate: Decachlorobiphenyl			98 %	*40-190%*		"	"	"	
Lab ID: 1009037-12									**Wipe - Sampled: 09/16/10 13:15**
Sample ID: VEWS-12									**Polychlorinated Biphenyls by EPA Method 8082A**
Aroclor 1016		ND	U	0.4	ug/100cm²	B0I0114	09/22/10	09/24/10	8082A/SOP335

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Sample Results

Analyte	Reanalysis / Extract	Result	Qualifiers / Comments	Quantitation Limit	Units	Batch	Prepared	Analyzed	Method
Lab ID:	**1009037-12**								**Wipe - Sampled: 09/16/10 13:15**
Sample ID:	**VEWS-12**								
							Polychlorinated Biphenyls by EPA Method 8082A		
Aroclor 1221		ND	U	0.8	ug/100cm²	B0I0114	09/22/10	09/24/10	8082A/SOP335
Aroclor 1232		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1242		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1248		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1254		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1260		ND	U	0.4	"	"	"	"	8082A/SOP335
Aroclor 1262		ND	U	0.4	"	"	"	"	8082A/SOP335
Surrogate: Tetrachloro-m-xylene			102 %	*57-114%*		"	"	"	
Surrogate: Decachlorobiphenyl			99 %	*40-190%*		"	"	"	

Quality Control

Analyte	Result	Qualifiers / Comments	Quantitation Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch B0I0114 - 3580A Waste Dilution - PCBs									**Prepared: 09/22/10 Analyzed: 09/24/10**	
									Polychlorinated Biphenyls by EPA Method 8082A - Quality Control	
Blank (B0I0114-BLK1)										
Aroclor 1016	ND	U	0.4	ug/100cm²						
Aroclor 1221	ND	U	0.8	"						
Aroclor 1232	ND	U	0.4	"						
Aroclor 1242	ND	U	0.4	"						
Aroclor 1248	ND	U	0.4	"						
Aroclor 1254	ND	U	0.4	"						
Aroclor 1260	ND	U	0.4	"						
Aroclor 1262	ND	U	0.4	"						
Aroclor 1268	ND	U	0.4	"						
Surrogate: Tetrachloro-m-xylene	*0.452*			"	*0.400*		113	*57-114*		
Surrogate: Decachlorobiphenyl	*0.426*			"	*0.400*		107	*40-190*		
LCS (B0I0114-BS1)										
Aroclor 1016	1.16		0.4	ug/100cm²	1.00		116	39-167		
Aroclor 1260	1.2		0.4	"	1.00		120	38-177		
Surrogate: Tetrachloro-m-xylene	*0.457*			"	*0.400*		114	*57-114*		
Surrogate: Decachlorobiphenyl	*0.419*			"	*0.400*		105	*40-190*		

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Project Number:	R10R04	**75 Hawthorne Street**		**Reported:**	10/18/10 10:37
Project:	Phoenix Area 2010 PCB Inspections	**San Francisco CA, 94105**			

Qualifiers and Comments

J The reported result for this analyte should be considered an estimated value.

C1 The reported concentration for this analyte is below the quantitation limit.

U Not Detected

NR Not Reported

RE1, RE2, etc: Result is from a sample re-analysis.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

DEC 15 1994

Mr. Frank D. Sales, Jr.
President
Salesco Systems USA, Inc.-AZ
5736 West Jefferson
Phoenix, AZ 85043

Re: **Commercial PCB Storage and Lighting Ballast Recycling Approval**
EPA ID AZD 983473539

Dear Mr. Sales:

This letter, with enclosed conditions, serves as written approval pursuant to 40 CFR Parts 761.65 (d)(1) and 761.60 (e) for Salesco Systems USA, Inc.-AZ to commercially store PCBs and PCB articles and to recycle and dispose of PCB-contaminated lighting ballasts at 5736 West Jefferson, Phoenix, Arizona.

The Environmental Protection Agency (EPA) Region IX has reviewed your August 17, 1994 application to commercially store PCBs and to recycle and dispose of PCB-contaminated lighting ballasts and has determined that the Salesco Systems USA, Inc.-AZ operation at 5736 West Jefferson, Phoenix, Arizona will not pose an unreasonable risk of injury to health or the environment. This approval incorporates the closure plan submitted in the application and amendments offered in response to EPA's notice of deficiencies.

This approval shall expire on December 31, 1999 unless the applicant makes a written request for renewal of this approval at least 180 days prior to the expiration date.

The total amount of PCB materials and PCB Items may not exceed 40,500 gallons of PCB waste and 7,700 gallons of non-PCB waste nor the quantity whose disposal cost would be more than Salesco's closure cost estimate for the maximum PCB inventory.

For PCB analyses, EPA approves the use of Salesco-AZ's on-site laboratory so long as the certification by the Arizona Department of Health Services remains in effect. Salesco-AZ may use any other laboratory certified for PCB analysis.

Salesco-AZ has chosen the trust fund as their financial assurance mechanism for closure. Acceptable documentation must be provided to EPA within 30 days from the date of this approval that the first payment into the trust has been received by the trustee. This first

payment must be sufficient to meet the requirements of 40 CFR 761.65 (g)(1). Failure to meet this requirement shall be grounds for termination of this approval and Salesco-AZ will be required to initiate closure of the facility.

In addition to Region IX, a copy of the Annual Report should also be sent to:

Mr. Thomas G. Simons
Office of Pollution Prevention and Toxics
US EPA Headquarters 7404
401 M Street
Washington DC, 20460

If you have any questions regarding this approval, please contact Yosh Tokiwa of my staff at (415) 744-1109.

Sincerely,

David P. Howekamp
Director
Air and Toxics Division

Enclosure:

cc: David K. Hanneman, OPPT

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

In the Matter of Salesco Systems USA Inc.-AZ Phoenix, AZ 85043 **EPA ID AZD983473539**	) Approval for Commercial Storage of) Polychlorinated Biphenyls (PCBs) and) Alternate Disposal of Lighting Ballasts)

AUTHORITY

This Approval to commercially store and process regulated Polychlorinated Biphenyl (PCB) contaminated materials and to separate and recycle Lighting Ballasts is issued pursuant to Section 6(e)(1) of the Toxic Substances Control Act (TSCA) of 1976 (Public Law No. 94-469) and the Federal PCB Regulations, 40 CFR 761.60 (e) and 761.70 (a) and (b) (48 CFR 13185, March 30, 1983).

EFFECTIVE DATE

This approval shall be effective upon signature of the Director of Air and Toxics Division, EPA Region IX.

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Printed on Recycled Paper

DEFINITIONS

All the terms and abbreviations used in this Approval shall have the meanings as defined in 40 CFR Section 761.3, EPA's "Guidelines for PCB Destruction Permit Applications and Demonstration Test Plans" (April 16, 1985) and "TSCA Guidance Manual for Commercial PCB Storage Facility Applications (October 18, 1989), unless the context clearly indicates otherwise or unless defined below for the purposes of this Approval.

"Application" and "Salesco Systems USA-AZ Application" mean the August 17, 1994 Application, and subsequent modifications, which were submitted to EPA for PCB storage non-thermal alternate disposal process of PCBs.

"Alternate Disposal Technology" means the process of separating PCB-contaminated potting material and capacitors from recyclable metal components of lighting ballasts.

"ATD" means the Director, Air and Toxics Division, EPA Region IX.

"EPA" means the United States Environmental Protection Agency, Region IX Office.

"Destroy by Recycling" means destroying the original identity of the article by melting, grinding, etc., and reusing the material.

"Lighting Ballast" means a device that controls the flow of electric current to fluorescent and high-intensity discharge (HID) lamps.

"Parts per Million" (ppm) means mg per kilogram (mg/kg).

"PCB-Containing Lighting Ballast" means any lighting ballast with potting compound containing, or presumed to contain, PCBs at or exceeding 50 ppm PCBs.

"Potting Compound" means the tar-like substance used as an insulator in lighting ballasts. Some potting compounds contain PCBs.

"Regional Administrator" means the Regional Administrator, EPA Region IX.

"Salesco-AZ" means Salesco Systems USA, Inc.-AZ.

"Salesco-AZ" and "Facility" mean the site located at 5736 W. Jefferson, Phoenix, AZ 85043 where the Salesco Systems USA, Inc.-AZ EPA-approved PCB storage and lighting ballast recycling and disposal site is located.

APPROVAL

Salesco Systems USA, Inc.-AZ has submitted an application to the Regional Administrator for commercial storage and alternate disposal of PCBs and PCB Items. Under 40 CFR 760.65 (i), the Regional Administrator is authorized to issue permits for activities involving PCBs and PCB wastes. This authority has been redelegated to the Director, Air and Toxics Division by Regional Order R9 1260.31.

1. Approval is granted to Salesco-AZ to commercially store and process regulated Polychlorinated Biphenyl (PCB)-contaminated articles and items and to separate PCB-containing potting material and capacitors from recyclable metal components of lighting ballasts as described in the Salesco-AZ Application and in accordance with this Approval and the Conditions of Approval as stated herein.

2. This Approval shall become effective upon signature of the Director of Air and Toxics Division, EPA Region IX and shall expire on December 31, 1999, unless revoked, suspended, or terminated in accordance with the Conditions of Approval stated herein.

3. Salesco-AZ has chosen the trust fund as their financial assurance mechanism for closure. Acceptable documentation must be provided to the EPA within 30 days from the date of this Approval that the first payment into the trust has been received by the trustee. This first payment must be sufficient to meet the requirements of 40 CFR 761.65(g)(1). Failure to meet this requirement shall be grounds for termination of this Approval and Salesco will be required to initiate closure of the facility.

4. To renew this Approval for for commercial PCB storage and recycling lighting ballasts, Salesco-AZ must apply to the EPA in writing at least 180 days but not more than 270 days prior to the expiration date of this Approval. EPA may require Salesco-AZ to submit additional information in connection with its application for renewal. The above-mentioned information will be reviewed by EPA to determine if this Approval is to be renewed.

CONDITIONS OF APPROVAL

A. GENERAL CONDITIONS

1. Salesco-AZ must comply with and operate in accordance with provisions of the PCB regulation 40 CFR 761, with the Conditions of Approval stated herein, and with the Salesco-AZ application and amendments which were submitted to and approved by the EPA.

2. Any departure from the Conditions of Approval, modifications of this Approval, or the Salesco-AZ application approved by the EPA, must receive prior written authorization from the ATD. Departure from the Conditions of Approval, from any modifications of this Approval, or from the Salesco-AZ Application approved by the EPA, without prior written approval by the ATD, will subject this Approval to revocation, suspension, or termination,

and will subject Salesco-AZ to enforcement action under TSCA. If at any time Salesco-AZ becomes aware of any departure from the PCB regulation, Conditions of Approval, modifications of this Approval, or the Salesco-AZ application, Salesco-AZ shall notify the ATD by telephone within 24 hours and shall submit a written report to the ATD describing the departure within five (5) working days.

2. EPA reserves the right to impose additional conditions to the Approval and to modify any condition. EPA may withdraw or modify this Approval if it has reason to believe that the continued operation of the storage and disposal activity or facility presents an unreasonable risk to public health or the environment, if the EPA issues new regulations or standards for issuing PCB approvals, or for noncompliance with the Conditions of Approval or the PCB regulation (40 CFR 761).

3. Salesco-AZ shall provide upon request any information which the EPA deems necessary to determine whether cause exists for modification, revocation, suspension, or termination of this Approval. Failure to provide the above-mentioned information within five (5) working days of its request shall be deemed a violation of the Conditions of Approval.

4. Salesco-AZ is responsible for the actions of all Salesco-AZ employees, agents, and contractors who are involved in the operation of the storage and disposal facility. Compliance with the PCB regulation, the Conditions of Approval, modifications of this Approval, written notifications, and the Salesco-AZ application approved by the EPA, does not relieve Salesco-AZ of the responsibility to comply with all other applicable federal, state, and local laws and regulations.

5. Salesco-AZ shall allow inspection of the site, storage facility, recycling facility, and records relating to the facility and operations by the EPA authorized employees, agents, or contractors at any time to determine compliance with applicable statutes, regulations, Approval, and Conditions of Approval issued pursuant thereto. Any refusal by Salesco-AZ to allow access to the site and process, or refusal to provide copies of records shall be deemed a violation of the Conditions of Approval.

6. Salesco-AZ shall submit a written request to the ATD for a modification of this Approval to store PCBs and recycle PCB ballasts and its closure plan whenever:

a. there is to be a change in ownership, operating plans, or facility PCB storage area specifications,

b. there is a change in the expected date of closure (December 31, 2004),

c. unexepected events require modification of the approved closure plan,

d. changes in regulation require a more costly disposal method than that specified in the approved closure plan.

7. At least thirty (30) days before transferring ownership of the facility, a notarized

affidavit signed by the transferee which states that the transferee will abide by all provisions of this Approval shall be submitted to the ATD. After receiving such notification and affidavit, and other such documents as EPA may require, EPA may issue an amended Approval substituting the transferee's name for the Salesco-AZ name, or EPA may require the transferee to apply for a new PCB storage and recycling Approval. The transferee shall not operate under the Approval until the ATD issues an Approval in the transferee's name.

8. This Approval is binding upon Salesco-AZ. Salesco-AZ shall be responsible hereunder for any violations by officers or employees of any company having a financial interest in Salesco-AZ.

9. For PCB analysis, EPA approves the use of Salesco-AZ's own on-site laboratory so long as the certification (Arizona Environmental License Number AZ0475) by the Arizona Department of Health Services remains in effect. Salesco-AZ may use any other laboratory certified for PCB analysis which is certified for PCB analysis.

B. PROCESSING OF BALLASTS

The Salesco-AZ's PCB lighting ballast recycling and disposal process involves screening the ballasts, physically separating the metal components from associated PCB-contaminated potting compound and recycling the metals. Salesco-AZ shall meet the following work practice, operation, and other standards at all times during the operation of its facility:

1. Externally leaking ballasts and ballasts showing visual signs of leakage shall be excluded from recycling and disposed of as TSCA waste. Separation of leaking ballast components is not permitted.

2. All PCB-contaminated wastes in the form of non-leaking capacitors, potting compound, and associated debris and solid consumables such as personal protective equipment, disposable sampling templates, sorbents, wipes, solvents and/or solvent still bottoms, etc., shall be disposed of as TSCA waste in a chemical waste land fill approved pursuant to 40 CFR 761.75 or an incinerator approved pursuant to 40 CFR 761.70.

3. Leaking PCB capacitors from PCB ballasts shall be disposed of in an incinerator approved pursuant to 40 CFR 761.70.

4. Separated metal components shall be classified according to the amount of PCBs on the surface of the metal. Separated metal components with PCB levels at one hundred micrograms per one hundred square centimeters (100 ug/100 cm^2) or 50 ppm or less following processing may be recycled or disposed of as solid waste. Metals above 100 ug/100 cm^2 may be reprocessed or shall be disposed of as solid waste. For recycling, the original identity of the article shall be destroyed by melting, grinding, etc. Metal components with PCB levels at or below 10 ug/100 cm^2 or below 2 mg/kg following processing may be reused.

5. Potting material and separated non-metallic material removed from PCB ballasts

shall be presumed to contain 50 ppm or greater PCB unless the material is demonstrated to contain less than 50 ppm. Such material may be demonstrated to contain less than 50 ppm PCBs by a composite sample of each batch unless 1) potting material known to contain PCBs at 50 ppm or greater was added to the batch or 2) material from a leaking PCB ballast was added to the batch.

6. Each batch of separated metal and nonmetal materials for PCB analysis shall be thoroughly mixed before sampling by one of the following sample collection procedures:

> A sample may be taken of the material in each shipping container if the container contains one cubic yard of material or less.
>
> A sample may be composited from subsamples taken from more than one shipping container, provided the composite is taken from no more material than is included in one shipment.
>
> A sample may be composited from subsamples collected from material separated each day, provided the composite is taken from no more material than is included in one shipment. At least one subsample shall be taken of the separated material generated in a normal production day.

7. Potting material and separated non-metallic material at or 50 ppm or greater but less than 500 ppm shall be disposed of in a chemical waste land fill approved pursuant to 40 CFR 761.75 or an incinerator approved pursuant to 40 CFR 761.70.

8. Potting material and separated non-metallic material at or 500 ppm or greater shall be disposed of in an incinerator approved pursuant to 40 CFR 761.70.

9. PCB waste, as defined in 40 CFR 761.3, shall be stored and transported in appropriate packaging as specified by the United States Department of Transportation.

10. In the event further decontamination of the metal is required, Salesco-AZ must apply for a permit amendment for such change.

C. STORAGE OF PCBs

1. Storage is limited to oil-filled electrical equipment, recovered dielectric fluids, drummed PCB solids and liquids, lighting ballasts, separated metal components, potting materials, separated non-metallic materials and capacitors removed from PCB ballasts, ballast processing and clean-up consumables listed in Salesco-AZ's application.

2. Storage of PCB and PCB Items are limited to the PCB storage area specified in the Salesco Application except PCB materials and PCB Items in transit to or from the Facility may remain outside the designated PCB storage area for a time not to exceed six (6) days.

3. Non-leaking PCB lighting ballasts and PCB articles may be stored temporarily outside the designated storage area for up to 30 days from the date of removal from service

provided the ballasts are placed in a covered, marked, non-leaking container and a note is attached to the container indicating the date of the item(s) removal from service.

4. Leaking PCB lighting ballasts may be temporarily stored outside the designated storage area for up to 30 days from the date of removal from service provided the ballasts are placed in a covered, non-leaking container that contains sufficient sorbent material to absorb any liquid PCBs remaining in the PCB ballasts and a note is attached to the container indicating the date the item(s) were removed from service.

5. The total amount of PCB materials and PCB Items at the Facility whether in or outside the designated PCB storage area may not exceed 40,500 gallons of PCB waste and 7,700 gallons of non-PCB waste nor the quantity whose disposal cost would equal the estimated cost of disposal of the maximum PCB inventory set forth in Salesco's closure cost estimate.

6. All equipment used for handling PCBs and PCB Items that come in direct contact with PCBs should be marked with the PCB M_L label (40 CFR 761.45 (a). The PCB M_S label may be substituted if the equipment cannot accommodate the M_L label.

7. Per 40 CFR 761.65 (c)(4), no item of movable equipment that is used for handling PCBs and PCB Items in the storage and recycling facilities and that comes in direct contact with PCBs shall be removed from the storage and recycle facility area unless it has been decontaminated as specified in § 761.79.

8. Any spill onto absorbent material contained within a containment pan shall be cleaned by removal of the absorbent material within 48 hours of the spill. The absorbent material must be treated as PBC regulated waste. All other spill inside or outside of the PBC Storage area shall be remediated as a specified in D4 of this approval.

9. Access to the PCB storage and waste handling activities shall be restricted to those Salesco employees on the signature sheet specified in D2, federal, state and local inspectors, and emergency response personnel.

D. WORKER PROTECTION

1. Salesco-AZ shall comply with the Safety and Hygiene program of the approved application.

2. Salesco-AZ's application includes a training plan in the form of a training manual for training workers. Within thirty (30) days of EPA permit approval, Salesco-AZ must train its employees as specified in the manual. New employees must be trained as specified in the manual prior to entering the PCB storage and ballast recycling areas. In addition to addresssing the regulatory requirements of 40 CFR 761, the training must also include the Prevention Control and Countermeasure (SPCC) Plan. A signature sheet must be used to verify personnel participation.

3. All plant operations personnel must enter and leave the PCB processing facility through a clean-in/clean-out facility.

4. Surfaces of the non-processing and clean-in/clean-out areas shall not exceed 10 ug/100 cm^2 PCBs.

5. In the event levels of contamination in excess of those referenced in Paragraph D4, Salesco-AZ shall immediately begin decontamination of the affected area(s). Cleanup to below the referenced levels shall be completed within 48 hours of the initial discovery of the contamination.

E. CONTINGENCY PLANS and EMERGENCY PROCEDURES

1. Salesco-AZ shall follow the Spill Prevention Control and Countermeasures Plan (SPCC Plan) in the approved application whenever there is a fire, explosion, or release of PCBs or hazardous constituents.

2. A copy of the Contingency Plan and all revisions to the Plan are to be maintained at the Salesco-AZ site. A copy of the Training Manual and this Approval shall also be maintained on-site. Also lists of emergency contacts, telephone numbers, and emergency exit routes shall be posted in prominent locations throughout the facility.

3. The facility shall at a minimum be equipped with the following:

(a) an internal communications or alarms system capable of providing immediate emergency instruction (voice or signal) to facility personnel,

(b) devices, such as a telephone which is immediately available at the scene of operations or a hand-held two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams,

(c) portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment,

(d) water at adequate volume and pressure to supply fire hose streams or foam equipment.

4. Salesco-AZ shall at a minimum test and maintain the equipment specified above as recommended by the manufacturer to assure its proper operation in time of emergency. In the event any of the equipment specified above was manufactured by Salesco-AZ, Salesco-AZ shall establish and follow a testing and maintenance plan for those manufactured items.

5. Whenever PCBs are being poured, mixed, or otherwise handled, Salesco-AZ shall ensure that all personnel involved in the operation will have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee.

6. At all times, there shall be at least one (1) employee either at the Salesco-AZ facility or on call who has the responsibility for coordinating all emergency response measures. This employee shall have immediate access to the entire facility and to a device such as a telephone, cellular phone or a hand-held two-way radio immediately available at the scene of operation and capable of summoning external emergency assistance. This employee must have the authority to commit the resources needed to carry out the Contingency Plan.

7. Adequate aisle space shall be maintained to allow for unobstructed access and egress by personnel, fire protection equipment, and decontamination equipment to all PCB items stored on-site.

8. All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment shall be inspected at the frequencies referenced in Section XI of the approved application. All such equipment not specifically referenced in Section XI of the approved application must be inspected at least once a month to assure its proper operation. All emergency equipment inspection and maintenance records must be maintained at the Salesco-AZ site and made available to the EPA upon request.

9. Prior to operation, Salesco-AZ shall provide a written description of recycling and storage activities, stored materials, contingency plans, and emergency procedures, as described in the EPA-approved application, to local fire and police departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services.

10. In the event an authorized facility operator of Salesco-AZ believes, or has reason to believe, that any detectable quantities of PCBs, chlorinated solvents, or reagents have been released to the environment as a result of recycling and/or storage operation, the operation shall be terminated immediately, and the facility operator shall immediately inform the EPA emergency response personnel by telephone at (913) 236-3778. A full investigation into the cause of the incident and a detailed report shall be included in the daily operation records. A copy of this report describing the incident shall be submitted to the ATD by the close of business on the next regular business day following the incident. No additional material may be stored in the facility until the release problem has been corrected to the satisfaction of the EPA, and the ATD has provided written notice of such determination.

11. Salesco-AZ shall immediately report to EPA if unauthorized entry at the facility occurred which caused PCBs to be discharged, the nature of the problem, if any, that resulted from this occurrence, and corrective action taken by the facility to prevent future occurrences. This includes any tampering, destruction, or loss at the facility which caused release of PCBs.

12. Salesco-AZ shall review and immediately amend, if necessary, the SPCC Plan and Contingency Plan whenever:

(a) the Plan fails in an emergency,

(b) the facility changes in its design, construction, operation, maintenance, or other circumstances that materially increase the potential for fires,

explosions, or releases of PCBs or hazardous constituents, or from other responses necessary in an emergency,

(c) the list of emergency coordinators changes,

(d) the list of emergency equipment changes,

(e) any major revision is warranted,

(f) EPA determines that a revision to the Plan is necessary.

F. RECORDKEEPING and REPORTING

1. Salesco-AZ shall comply with all recordkeeping requirements outlined in the PCB Regulation, 40 CFR Part 761.

2. All PCB records, documents, and reports shall be maintained at one centralized location at the Salesco-AZ facility, and shall be made available for inspection by authorized EPA representatives. When Salesco-AZ ceases operations, all records, documents, and reports or certified copies thereof, shall be made available to EPA at the Salesco-AZ facility for a period of at least five (5) years following cessation of operations. If Salesco-AZ is unable to comply with this condition because it is no longer in control of the site, it shall comply by making the records, documents, and reports available at the location which is under control of Salesco-AZ nearest the site.

3. All records required by 40 CFR 761.180 and this Approval shall be written in ink or typed. Any modification or correction of the records must be initialed and dated by the supervisor in charge. If the recordkeeping is maintained by computer system, Salesco-AZ shall maintain monthly printouts of records pertaining to the process.

4. All records, documentation, and information relating to sampling, analysis, and quality assurance as required by this Approval shall be retained at the Salesco-AZ facility for a minimum of five (5) years, or longer if requested by the ATD. These records, documentation, and information shall include the following:

(a) exact date, place, and time of each sample collected,

(b) volume of each sample collected,

(c) name of person collecting each sample,

(d) name of analyst,

(e) date and time of analysis,

(f) the analytical techniques or methods used for each sample,

(g) the analytical results including chromatographs, calculations, and other raw data,

(h) calibration records and maintenance records of sampling equipment and analytical instrumentation, and

(i) records of quality assurance activities as described in Section 6 of the approved application.

5. At the completion of a cleanup required by Paragraph E9, Salesco-AZ shall develop and maintain records of the cleanup including at a minimum:

(a) identification of the source of the contamination

(b) the date and time contamination was discovered;

(c) the date and time cleanup was completed;

(d) a brief description of contaminated area;

(e) the pre-cleanup and post-cleanup sampling data used to define boundaries of contamination and a brief description of the sampling methodology used to establish contaminated boundaries;

(f) the amount of waste cleanup material generated and location of its disposal

(g) a certification statement signed by Salesco-AZ personnel stating that the decontaminated levels referenced in the appropriate Approval condition has been achieved and that the information contained in the record is true to the best of his/her knowledge.

6. Salesco-AZ shall submit to the ATD a summary of all modifications to the process and application document within ten (10) days of the end of each year's operation, or a report that no such modifications were made.

7. Salesco-AZ shall maintain copies of the Certificate of Disposal for all PCBs and PCB items which are stored at the commercial storage facility. Certificates of Disposal shall be provided to the generator within thirty (30) days of receipt by Salesco-AZ of documentation of final disposal of all materials resulting from the recycling of the generator's PCBs and PCB items.

G. CLOSURE and FINANCIAL REQUIREMENTS

1. Salesco-AZ shall comply with the current closure plan and closure cost estimate approved by EPA. At no time may the estimated costs associated with performing closure of the Salesco-AZ facility exceed the current closure cost estimate approved by EPA.

2. Salesco-AZ shall notify the ATD at least 90 days prior to the date it expects to begin closure.

3. Upon termination of the operation, Salesco-AZ shall proceed according to the provisions of the Closure Plan submitted to and approved by EPA. As used in this paragraph, "termination of the operation" includes cessation of operations required by expiration, termination, or revocation of this Approval.

4. Financial assurance equivalent to that specified in 40 CFR 761.65(g) shall be maintained to provide for:

(a) funding of proper closure of the operation. The closure plan shall include the decontamination and/or disposal in an EPA approved PCB disposal facility of PCB-contaminated equipment and materials;

(b) compensating others for bodily injury and property damage caused by accidents arising from operations of the facility.

5. Any payment required to establish or continue the financial assurance mechanism used to satisfy the financial requirements of this section shall be made, and written verification thereof shall be furnished to the ATD by the Chief Executive Officer of Salesco-AZ prior to operation under this Approval. Salesco-AZ shall submit such documentation as EPA may require to determine that the financial assurance requirements have been met.

6. An executed copy of the trust agreement or other instrument and satisfactory evidence as determined by EPA of adequate liability insurance meeting the requirements of 40 CFR 264 (H) shall be submitted to the ATD prior to operation under this Approval. Salesco-AZ shall submit such documentation as EPA may require to determine that the liability insurance requirement has been met.

7. Salesco-AZ shall amend the Closure Plan whenever changes in operating plans or facility design affect the Closure Plan, including the current closure cost estimate, or whenever there is a change in the expected year of closure. Salesco-AZ must submit to the ATD for approval any modifications to the Closure Plan at least thirty (30) days prior to the modification.

8. Salesco-AZ shall submit documentation of continued financial assurance annually to the ATD to meet the requirements of Paragraph 4 of this Section.

9. The cost estimate for closure shall be based on worst-case conditions and shall be updated annually, or whenever a change in the Closure Plan increases the closure cost, and maintained on-site with the Closure Plan. The updated closure cost estimates shall be submitted to the ATD within thirty (30) days of Salesco-AZ's modification of the estimated closure cost.

H. DEMONSTRATION TEST

Because the Salesco-AZ process is nearly identical to one approved by US EPA Region II and since the viability, intergrity, and safety of method has been reported by Technical Services at the Government Services Canada Headquarters, Salesco-AZ will not be required to conduct a pre-operation demonstration test. EPA, however, may use an inspection of the facilities and monitor a production run in lieu of such demonstration test.

12/15/94
Date

David P. Howekamp
Director
Air and Toxics Division

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
HAZARDOUS WASTE INSPECTIONS AND COMPLIANCE UNIT

HAZARDOUS WASTE INSPECTION REPORT

FACILITY NAME: Veolia Environmental Services

EPA ID NUMBER: AZ0 000 337 360

STREET ADDRESS: 5736 W. Jefferson Street

CITY/STATE/ZIP: Phoenix, Arizona 85043

LATITUDE/LONGITUDE: N 33° 26' 47" / W 111° 11' 08"

TELEPHONE NUMBER: (602) 233-2955

MAILING ADDRESS: Same

INSPECTION DATE: March 17, 2008

FACILITY REPRESENTATIVE(S) AND TITLE(S):

1. Chip Hume, Environmental Health & Safety Manager
2. D. Heath Hildebrand, General Manager

ADEQ REPRESENTATIVE(S):

1. Travis Barnum, Compliance Officer, Hazardous Waste Inspections and Compliance Unit
2. Jaclyn Palermo, Compliance Officer, Hazardous Waste Inspections and Compliance Unit
3. Jessica Olmstead, Compliance Officer, Hazardous Waste Inspections and Compliance Unit

OTHER PARTICIPANTS/AGENCIES:

1. Estrella Armijo, RCRA Enforcement Officer, US EPA, Region 9, WST-3
2. Christopher Rollins, RCRA Enforcement Officer, US EPA, Region 9, WST-3

NOTE: Any omissions in this report and any accompanying notices shall not be construed as a determination of compliance with applicable regulations. Any regulatory citations to 40 CFR are as adopted by the Arizona Administrative Code, A.A.C. R18-8-201 *et seq.*

1. BACKGROUND INFORMATION

Representatives of the Arizona Department of Environmental Quality (ADEQ), Hazardous Waste Inspections and Compliance Unit (HWICU) conducted a routine treatment, storage, and disposal facility (TSDF) inspection of Veolia ES Technical Solutions L.L.C. (Veolia) on March 17, 2008. The purpose of the inspection was to determine compliance with applicable hazardous waste rules and regulations.

According to ADEQ records, the last hazardous waste inspection of Veolia was completed by HWICU on April 25, 2007. In the previous inspection report dated May 23, 2007, no violations were found.

The facility has reported the following to the ADEQ Geographic Information Systems & Information Technology Unit:

EPA Notification Form 8700-12 Status/Year Large Quantity Generator (LQG), Transporter, TSDF, Recycling Facility/ 2006
Facility Annual Report Status/Year: LQG, Transporter, TSDF, Recycling Facility/ 2006
Annual ADEQ Facility Registration Fee Status/Year: LQG, Transporter, TSDF, Recycling Facility/ 2006
Database Manifest Totals: 448,638 lbs / 2007

During the inspection, Veolia reported the following other permits or activities:

Air Quality Permits: Maricopa County #000139
Drywells: 11 on-site dry wells to drain storm water. 8 have been permanently sealed. Three wells in employee parking lot stenciled "Storm Water Only".
Sewer System/Septic: City of Phoenix
Dumpster/Hauler: CMS
Underground Storage Tanks: None
Alarm System: Yes
Last Fire Department Inspection: 2005
Other Permits: EPA Commercial Storage Permit (TSCA), City of Phoenix Class B Zero Categorical Discharge Permit# 0612-10963-ZCD

2. GENERAL INFORMATION

Veolia is a mercury recycling facility that has a hazardous waste permit to store mercury containing material on-site until it is sent through the recycling process. The different wastes received and processed for recycling are fluorescent lamp bulbs, high intensity discharge lamps, mercury switches, lighting ballasts, batteries, lab instruments, and other mercury containing products. The mercury is extracted utilizing retort ovens to vaporize the mercury and collect the condensate for reuse. Metal, glass and other scrap are sent off site for recycling. Phosphor powder is sent to a permitted Veolia facility in Port Washington, WI. The company also stores and transports waste batteries and electronic equipment (e-waste). The hazardous waste permit sets maximum capacity limits for the facility which can be found in Veolia's Arizona Hazardous Waste Management Act (AHWMA) Permit, Attachment A.

The facility is approximately 2.67 acres and has been in operation at its current site for approximately 8 years. Veolia employs 80 people at the facility and the normal hours of operation are 5:30am to 5:00pm, Monday through Friday, although hours may extend based on facility requirements.

WASTE STREAM IDENTIFICATION AND HANDLING

Waste No.	Waste Stream	Handling Description
D009	Mercury Retort	Tested and transported off site for disposal
D001, D002, D003, D004, D007, D009	M-4 process water, contaminated PPE	Tested and transported off site
D009	Air scrubber filters	Tested and transported off site as hazardous waste
D009	Phosphor powder	Sent off site for mercury recovery
D005, D006, D008, D010	Batteries and electronic waste	Transported off site for recycling
U151	Mercury taken from the Mercury Disassembly Room	Sold as product
D009	Bead filters	Placed into retort for mercury recovery
D009, D007, D011	Wastewater from Mercury Recovery Systems	Placed into retort for mercury recovery

Table 1 - Source of information for table: Facility Annual Report (2007) and ADEQ database

3. PHYSICAL INSPECTION

ADEQ compliance officers arrived at 5736 W Jefferson St, Phoenix, AZ 85043 (Photograph #1) at approximately 9:45am on March 17, 2008. ADEQ compliance officers identified themselves to D. Heath Hildebrand, General Manager and Chip Hume, Environmental Health & Safety Manager for Veolia. The ADEQ Notice of Inspection Rights form was explained to and signed by Mr. Hildebrand (Attachment #1). Facility operations were briefly discussed with Mr. Hildebrand and Mr. Hume. Mr. Hildebrand and Mr. Hume accompanied the compliance officers on the entire inspection.

The site comprises of four buildings numbered 1 through 4 running from west to east. Between buildings #2 and #3 are gates and two truck wells (Photograph #2) dedicated to inbound shipments. On the Westside of building #1 and eastside of building #4 are truck wells dedicated to outbound shipments (see Site Map, Attachment 3). Facility representatives began the physical inspection at the point of entry when shipments are received.

Building #2

Building #2 is designated as the receiving and processing area. The five main areas in building #2 are; receiving, staging, reject, transformer storage and transformer decommissioning. Facility representatives stated that all incoming waste containers are received and processed. Processing involves a visual check that the container is labeled, closed, and matches the manifest and waste profile. Oversized items, for example waste transformers (Photograph #3) are staged outside of building #2 in secondary containers, while all other containers and transformers are received inside building #2.

During the processing phase, information is inputted into Veolia's tracking database. This database allows information about the container to be shared with local operations staff and other Veolia facilities. A label produced from this database is affixed to a container in the receiving area which is then staged for facility staff to move the container to the appropriate onsite location for further processing (Photograph #4 & 8).

Facility representatives stated Veolia's standard operating procedure (SOP) for a container that is beyond the facility's permitted capabilities, is to stage it in a 10-Day Reject / Transfer Area (Photograph #7). The container(s) are either returned to the generator or forwarded onto another facility that can handle/process the container. If a container is missing information, then an orange cone is placed on top of the container (Photograph #6). Once the missing information is provided, the container resumes the normal processing phase. However if the generator does not provide the necessary information it is moved to the 10-Day Reject / Transfer Area (Photograph #7) and follows the SOP for containers in that area.

The transformer storage area was along the west wall of the building. In the southwest corner was the decontamination unit to lower PCB concentrations in PCB containing materials and to

decommission transformers. ADEQ compliance officers observed Veolia's labeling system for items with PCB's (Photograph #5). These waste streams are regulated under the Toxic Substance Control Act (TSCA). EPA compliance officers took lead of the inspection at that time. EPA compliance officers reviewed process and procedures with facility representatives.

ADEQ compliance officers observed a spill kit with an inventory log, a contingency plan, MSDS, fire extinguishers and an evacuation plan posted near the north entrance of building #2. No hazardous waste issues were observed in this area.

Building #3

Building #3 handles TSCA waste and was designated as PCB's handling only. EPA compliance officers led this section of the inspection. Facility representatives stated the metal containers that hold PCB waste are recycled. All drums containing PCBs were properly closed, labeled and dated (Photograph #26).

ADEQ compliance officers observed a spill kit with an inventory log, a contingency plan, MSDS, fire extinguishers and an evacuation plan posted near the north entrance of building #3. No hazardous waste issues were observed in this area.

Outdoor Storage Area

North of Building #2 ADEQ compliance officers observed rows of pallets with universal waste lamps, transformers, and e-waste. Three universal waste lamp containers were poorly packaged and not closed (Photographs #9, 10 & 11). Facility representatives stated the generators do not always package the bulbs properly or they accidently open during transit prior to delivery to Veolia. During the inspection facility representatives closed the containers (Photograph #29 & 30).

90-Day Hazardous Waste Storage Area Building

North of Building #1 is the 90-Day Hazardous Waste Storage Area Building. At the time of the inspection, ADEQ compliance officers observed universal waste lamp containers not properly closed (Photograph #13). Facility representatives again stated the generators do not always package the bulbs properly. ADEQ compliance officers randomly chose a 55-gallon drum of hazardous waste and asked facility representatives to provide information about the drum from the Veolia tracking database (Photograph #14 & 15). The printout from the Veolia database identified the container was received February 9, 2008 from New Mexico State University containing broken thermometers (Attachment #3). The building had a concrete berm which provided proper secondary containment. Drums and containers were stored only two high and had adequate aisle spacing. During the inspection, facility representatives closed the universal waste lamp containers.

Building #1

Building #1 houses the mercury processing operations. Outside of the building on the northwest corner is the staging area for waste lamps to be processed that day (Photographs #16 thru 19). If they are not processed by the end of the day, they are stored in the 90-Day Hazardous Waste Storage Area Building. ADEQ compliance officers observed broken waste lamps in the staging area. ADEQ compliance officers recommended that broken waste lamps that do not get treated and are stored in the 90-Day Hazardous Waste Storage Area need to be handled as hazardous waste instead of universal waste.

The compliance officers did not enter the processing area due to high levels of mercury. Facility representatives stated workers must wear personal protective equipment (uniform, respirator and gloves) as required in the lamp processing area (Photograph #21). The crushing process generates mercury phosphor powder, metal end caps and glass. The mercury and the phosphor powder are collected in the dust collection system located at the north side of the building (Photograph #25). The satellite container was labeled and all piping was secure around the container. Facility representatives stated that the container piping is inspected daily to ensure there are no leaks. Sulfur impregnated carbon is used to filter the exhaust (Photograph #23 & 24). The mercury and the phosphor powder are shipped to another Veolia facility for retort. The end caps are deposited in a container for recycling. All glass is tested quarterly and sent to a recycling facility. No hazardous waste issues were observed in this area.

Waste elemental mercury from thermometers and switches are collected in the Mercury Disassembly Room and sent to another Veolia facility to sell as a product. Staff working in this area is required to wear Level C personal protective equipment and supplied air respirators. ADEQ compliance officers were only permitted to view this room from the outside (Photo #20). No hazardous waste issues were observed in this area.

Mercury containing devices are processed in the M-4 area. All sludge produced by the M-4 process is retorted. The recovered mercury is sold as a consumer product. No hazardous waste issues were observed in this area.

Building #4

Building #4 consists of offices, battery processing, and waste storage areas. In the storage area the compliance officers observed seven drums containing phosphor powder (D009). The phosphor powder is shipped to Veolia's Port Washington, WI facility for retort (Photograph #28). East of the storage area, liquid hazardous waste is stored in a segregated area with secondary containment (steel lined pans). These two areas are managed as 90-Day Hazardous Waste Storage Area.

The west side of the building is used for the Universal Waste Battery Area. The compliance officers observed properly spaced aisles of drums containing waste batteries which were sorted

into rows by battery type (Photograph #27). All containers holding hazardous waste were properly closed, labeled and dated. At the time of the inspection, ADEQ compliance officers observed a spill kit, a contingency plan, fire extinguishers and an evacuation plan. North of Building #4 was additional outdoor storage consisting of e-waste and more transformers.

4. DOCUMENT REVIEW

Prior to inspection the following documentation was reviewed by the ADEQ compliance officers; Registration Fees, FAR 8700-13 A/B, and Notification Form 8700-12 for 2006, past facility inspections, website information, and street map. The 8700-12 provided the update of Veolia ES Technical Solutions L.L.C. as the new name for the facility (previously Onyx Environmental Services L.L.C.).

Several hazardous waste records were requested and reviewed during the inspection on March 17, 2008 (Attachment #1). The records requested on the records request form were consistent with those required for a LQG / TSD facility.

Maps
Veolia provided several maps of the facility buildings and evacuation routes in the copy of the Hazardous Waste Contingency Plan (Attachment #3).

List of Safety & Emergency Equipment & Its Capabilities
A list of safety & emergency equipment and its capabilities was determined to be sufficient (Attachment #3).

Weekly Inspection Checklists
The weekly inspection checklists provided for the 90-Day Hazardous Waste Storage Area and emergency equipment were sufficient (Attachment #3).

Facility Annual Report, Registration Fees, Generation Fees
The 2007 FAR was not finished, 2007 Registration Fees were determined to be sufficient, and 2007 Generation Fees were determined to be sufficient. Facility representatives stated they filed for a 30-day extension to submit the FAR. The approval letter from ADEQ was dated February 20, 2008 (Attachment #3).

Waste Determination Records
Waste Determination Records were determined to be sufficient. ADEQ compliance officers reviewed lists of wastes produced and process descriptions. As per permit compliance, analytical and sampling results were reviewed.

Contingency Plan
The Contingency Plan was determined to be sufficient (Attachment #3).

Spill Reports
Veolia had no reportable spills therefore no spill reports were submitted to ADEQ compliance officers.

Training records
Training records were determined to be sufficient. Certificates were observed for Mr. Hildebrand and Mr. Humes who had taken the 40 hour HAZWOPER and 16 hour RCRA training courses. Attendance lists for other training classes with a hazardous waste component showed that many Veolia personnel had attended these classes. Job descriptions and personnel training requirements are sufficient. Veolia had a training plan for persons who are handling hazardous waste. Veolia had a training plan for persons who are handling universal waste (Attachment #3).

Pollution Prevention Analysis and Plan
The Pollution Prevention Analysis and Plan was reviewed and determined to be sufficient.

Manifests
The following manifests were in ADEQ records, however the "Destination Facility to Generator" manifest copies were missing.

Manifest Number	Generator Date
000061303VES	7/10/07 RCRA
000143631VES	10/25/07
000143647VES	11/01/07
000143679VES	?
000143682VES	10/17/07
000143703VES	10/24/07 RCRA
000143822VES	11/29/07

Table 2 – Source: Manifest Request Form

At the time of the inspection, facility representatives submitted the manifests (Attachment #3). Facility representatives stated only two of the manifests were RCRA waste, the others were PCB waste.

Land Disposal Restriction Notification Forms
Land Disposal Restriction Notification Forms were submitted to ADEQ compliance officers during the inspection (Attachment #3).

Waste Analysis Plan
Permit Attachment B - The Waste Analysis Plan was submitted to ADEQ compliance officers during the inspection (Attachment #3).

Closure Plan

Permit Attachment H - Closure Plan was reviewed by ADEQ compliance officers during the inspection and determined to be sufficient.

Financial Assurance
Permit Attachment H - The certificate of Insurance dated July, 2007 , Performance Bond dated April, 2007, Letters of Credit dated December, 2007 and the Foreclosure Cost Estimate Update dated April, 2007, were submitted to ADEQ compliance officers during the inspection (Attachment #3).

5. EXIT DEBRIEFING AND RECOMMENDATIONS

At the conclusion of the inspection, ADEQ compliance officers debriefed Mr. Hildebrand and Mr. Hume on the areas of concern identified during the inspection. See the Exit Debriefing Form provided to the facility on March 17, 2008 (Attachment #1).

6. FACILITY RESPONSE

E-mail dated March 31, 2008 – Electronic copy of 10-Day response was provided by Mr. Hume stating a hard copy was sent to ADEQ and 2007 FAR was sent to GIS & IT of ADEQ (Attachment #4). Enclosed in the 10-Day response:

- Photographs of Universal Waste Lamps packaged correctly
- Veolia Universal Waste Lamp SOP
- Universal Waste Lamp Training Plan
- Universal Waste Lamp Training Class Roster / Sign-in Sheet

Arizona Department of Environmental Quality
Hazardous Waste Inspections and Compliance Unit

ATTACHMENTS

1. Hazardous waste inspection field forms
   - Notice of Inspection Rights
   - Hazardous Waste Records Request
   - Hazardous Waste Manifests Requested Form
   - Inspection Exit Debriefing

2. Documents reviewed prior to the inspection
   - Registration Fees for (2006)
   - Facility Annual Report 8700-13 A/B (2006)
   - Notification Form 8700-12 (June 23, 2006)
   - Website Information

3. Documents provided during the inspection
   - Extension request/approval for 2007 FAR submittal
   - Maps / Site Drawings
   - List of Safety & Emergency Equipment
   - List of Emergency Coordinators
   - 90-Day Hazardous Waste Storage Area Weekly Inspection Logs
   - Contingency Plan update letter to Concentra
   - Veolia's Approved Hazardous Waste Facilities
   - Driver Training Plan (per permit requirements)
   - Pollution Prevention Plan & Report (cover page and table of contents only)
   - Waste Minimization Plan (cover page and table of contents only)
   - Veolia Tracking Database – sample printout
   - Manifests
   - Land Disposal Restriction Notification Forms (LDRs)
   - Financial Assurance
   - Certificates of Insurance for Liability
   - Facility Permits

4. Facility Submittals
   - 10-Day Response to the Exit Debriefing received (March 31, 2008)
     - Universal Waste Training & SOP
     - Training Roster / Sign-in Sheet

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* Attachments are located in the ADEQ Hazardous Waste Inspections and Compliance Facility File and may be requested for viewing through the ADEQ Records Management Unit

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

SEP 26 2003

Greig Seidor, Esq.
Onyx Special Services, LLC
700 East Butterfield Road, Suite 201
Lombard, IL 60148

Subject: Onyx Special Services, Inc.
Complaint/Consent Agreement and Final Order
Docket No. TSCA-9-2003-0006

Dear Mr. Seidor:

Enclosed please find your copy of the fully executed Complaint/Consent Agreement and Final Order which contains the terms of the settlement reached with EPA Region 9 Office of Regional Counsel. Your completion of all actions enumerated in the Consent Agreement and Final Order will close this case. If you have any questions, please contact Max Weintraub at (415) 947-4163.

Sincerely,

Enrique Manzanilla
Director
Cross-Media Division

Enclosures

ORIGINAL

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U.S. EPA, REGION IX
REGIONAL HEARING CLERK

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UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 HAWTHORNE STREET
SAN FRANCISCO, CALIFORNIA 94105

In the Matter of:	)	Docket No. TSCA-9-2003-0006
	)	
Onyx Special Services, Inc.	)	COMPLAINT/ CONSENT
	)	AGREEMENT AND FINAL ORDER
Respondent	)	
	)	

I. AUTHORITY AND PARTIES

This civil administrative action is brought pursuant to Section 16(a) of the Toxic Substances Control Act ("TSCA"), 15 U.S.C. § 2615(a), and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 Code of Federal Regulations ("C.F.R.") Part 22 ("Consolidated Rules").

The Complainant is the Director of the Cross Media Division, United States Environmental Protection Agency ("EPA"), Region IX. The Administrator of EPA delegated to the Regional Administrator of EPA, Region IX, the authority to bring this action under TSCA. In turn, the Regional Administrator of EPA, Region IX, further delegated the authority to bring

this action under TSCA to the Director of the Cross Media Division. Respondent is Onyx Special Services, Inc. ("Onyx" or "Respondent").

Pursuant to 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) of the Consolidated Rules, the filing of this combined complaint and consent agreement and final order ("CC/CAFO") is simultaneously commencing and concluding this civil administrative action against the Respondent. This CC/CAFO alleges that Respondent has violated Section 15 of TSCA, 15 U.S.C. § 2614, by violating the regulations governing polychlorinated biphenyls ("PCBs") at 40 C.F.R. Part 761, as described herein.

II. GENERAL ALLEGATIONS

1. Respondent is a Wisconsin corporation.
2. Respondent is a "person" as that term is defined by 40 C.F.R. § 761.3.
3. Respondent owns and operates a facility located at 5736 West Jefferson Street, Phoenix, Arizona 85043 (the "Facility").
4. Respondent changed its name from Superior Special Services, Inc. to Onyx Special Services, Inc. in 2002.
5. Respondent, as Superior Special Services, Inc., purchased the Facility from Salesco Systems USA, Inc. ("Salesco") in early 2000.
6. "PCB waste" means those PCBs and PCB Items that are subject to the disposal requirements of 40 C.F.R. Part 761 Subpart D. PCBs and PCB Items are defined broadly at 40 C.F.R. § 761.3 to include any articles or containers that contain or whose surfaces(s) have been in direct contact with PCBs.
7. Under 40 C.F.R. § 761.65(d), a commercial storer of PCB waste must obtain an approval

from EPA before engaging in commercial storage of more than 500 gallons of PCB waste.

8. Respondent is a "commercial storer of PCB waste" as that term is defined at 40 C.F.R. § 761.3 who stores more than 500 gallons of PCB waste.

9. EPA issued a written approval, titled TSCA Commercial PCB Storage and Lighting Recycling Approval ("TSCA PCB Approval"), to Salesco on December 15, 1994, which authorized Salesco to store up to 40,500 gallons of PCB waste at the Facility.

10. From 1994 to 1998, Salesco submitted three requests to EPA seeking to amend its TSCA PCB Approval to reduce the financial assurance for closure and lower its on-site authorized PCB waste storage capacity. Through a series of three separate TSCA PCB Approval amendments, EPA granted each of Salesco's requests. The last TSCA PCB Approval amendment was dated August 28, 1998, and reduced Salesco's PCB waste storage authorization at the Facility to 7,645 gallons. Concurrently, with this last TSCA PCB Approval amendment, EPA granted a reduction in the financial assurance to $52,703.

11. Salesco's TSCA PCB Approval, as amended, transferred to Respondent when Respondent, as Superior Special Services, Inc., purchased the Facility from Salesco.

12. Although the TSCA PCB Approval expired on December 31, 1999, Salesco's submission to EPA of an application to renew its TSCA PCB Approval on September 15, 1999, extended the applicability of the terms of the TSCA PCB Approval until such time as EPA acts on the application for renewal.

13. On or about September 26, 2000, representatives of EPA, Region IX, inspected the

Attachment 5: Community Outreach Response Team Membership Registration

The Community Outreach Response Team is comprised of Response Support Corps members with good communication skills, appropriate training and willingness to deploy to areas affected by a disaster.

If you are willing to be a member of the Community Outreach Response Team, please sign this form and note areas of experience you may have.

EXPERIENCES	☑ YES
RSC member?	
Community Involvement?	
Public Affairs Y	
Disaster Response (i.e. deployed to Katrina)?	
Language skills? List.	
Environmental Justice?	
Administrative Support? Describe.	
Other related? Describe.	

Please list the communities with which you are familiar through work, personal contacts and other interactions.

_____

_____

_____

_____

_____

_____

Are you interested in working with the Steering Committee on CORT program development, such as exercise design, tools and protocol?

☑ **YES** _____

I agree to participate on the Community Outreach Response Team by attending meetings, receiving trainings, participating in drills and exercises, and being available to be deployed for Community Outreach activities in the event of a disaster.

_____ _____

Name Date

Facility for the purpose of determining Respondent's compliance with its TSCA PCB Approval and the federal PCB regulations set forth at 40 C.F.R. Part 761.

Fluorescent Light Ballasts

14. Fluorescent light ballasts are "PCB Items" as that term is defined by 40 C.F.R. § 761.3.

15. At all times pertinent to this CC/CAFO, Respondent reclaimed metals from PCB-containing "fluorescent light ballasts" at the Facility.

16. As a consequence of the reclamation of metals from fluorescent light ballasts, the Facility engaged in PCB "storage for disposal" as that term is defined by 40 C.F.R. § 761.3.

17. Metal surfaces are "non-porous surfaces" as that term is defined by 40 C.F.R. § 761.3.

18. As a consequence of the reclamation of metals from fluorescent light ballasts, the Facility engaged in removing non-liquid PCBs, which are regulated for disposal, from non-porous surfaces.

19. At all times pertinent to this CC/CAFO, the metal reclaimed from fluorescent light ballasts at the Facility was subject to the decontamination standards at 40 C.F.R. § 761.79 because it was disposed of through unrestricted use. 40 C.F.R. § 761.60(b)(6)(ii)(A)(1).

Transformer Laminations

20. Transformer laminations are "PCB Items" as that term is defined by 40 C.F.R. § 761.3.

21. At all times pertinent to this CC/CAFO, Respondent reclaimed metals from PCB-containg "transformer laminations" at the Facility.

22. As a consequence of the reclamation of metals from transformer laminations, the Facility engaged in PCB "storage for disposal" as that term is defined by 40 C.F.R. § 761.3.

23. As a consequence of the reclamation of metals from transformer laminations, the Facility

engaged in removing non-liquid PCBs, which are regulated for disposal, from non-porous surfaces.

24. At all times pertinent to this CC/CAFO, the metal reclaimed from transformer laminations at the Facility was subject to the decontamination standards at 40 C.F.R. § 761.79 because it was disposed of through unrestricted use. 40 C.F.R. § 761.60(b)(6)(ii)(A)(1).

III. ALLEGED VIOLATIONS

COUNT I - Operation in Violation of an Approval Condition (40 C.F.R. § 761.65(d))

25. Paragraphs 1 through 24 above are hereby incorporated in this Count I by reference as if the same were set forth herein in full.

26. During calendar year 2000, Respondent was permitted under its TSCA PCB Approval to store up to 7,645 gallons of PCB waste at its Facility at any one time.

27. During calendar year 2000, Respondent stored more than 7,645 gallons of PCB waste at its Facility during certain periods.

28. Respondent's exceedance of its approved storage capacity during calender year 2000 is a violation of 40 C.F.R. § 761.65(d) and its TSCA PCB Approval.

COUNT II - Operation in Violation of an Approval Condition (40 C.F.R. § 761.65(d))

29. Paragraphs 1 through 24 above are hereby incorporated in this Count II by reference as if the same were set forth herein in full.

30. During calendar year 2001, Respondent was permitted under its TSCA PCB Approval to store up to 7,645 gallons of PCB waste at its Facility at any one time.

31. During calendar year 2001, Respondent stored more than 7,645 gallons of PCB waste at

its Facility during certain periods.

32. Respondent's exceedance of its approved storage capacity during calender year 2001 is a violation of 40 C.F.R. § 761.65(d) and its TSCA PCB Approval.

COUNT III - Operation in Violation of an Approval Condition (40 C.F.R. § 761.65(d))

33. Paragraphs 1 through 24 above are hereby incorporated in this Count III by reference as if the same were set forth herein in full.

34. During calendar year 2002, Respondent was permitted under its TSCA PCB Approval to store up to 7,645 gallons of PCB waste at its Facility at any one time.

35. During calendar year 2002, Respondent stored more than 7,645 gallons of PCB waste at its Facility during certain periods.

36. Respondent's exceedance of its approved storage capacity during calender year 2002 is a violation of 40 C.F.R. § 761.65(d) and its TSCA PCB Approval.

COUNT IV - Improper Disposal of PCB Waste (40 C.F.R. § 761.60(b)(6))

37. Paragraphs 1 through 24 above are hereby incorporated in this Count IV by reference as if the same were set forth herein in full.

38. Pursuant to 40 C.F.R. § 761.60(b)(6)(ii)(A), any person disposing of a PCB-Contaminated Article contaminated by non-liquid PCBs must do so by one of the following methods:

- in accordance with 40 C.F.R. § 761.79;
- in a facility permitted, licensed, or registered by a State to manage solid waste subject to RCRA regulations;
- in a scrap metal recovery oven or smelter operating in compliance with 40 C.F.R. § 761.72; or
- in an approved disposal facility approved under 40 C.F.R. Part 761.

39. Under Condition B.4 of Respondent's TSCA PCB Approval, separated metal components with PCB levels at 100 ug/100 cm^2 or 50 ppm or less may be recycled whereas separated metal components with PCB levels above this must be disposed of as solid waste.

40. Under Condition B.5 of Respondent's TSCA PCB Approval, separated metal components shall be presumed to contain 50 ppm or greater PCB unless the material is demonstrated to contain less than 50 ppm.

41. The decontamination standard for non-porous surfaces in contact with non-liquid PCBs is cleaning to Visual Standard No. 2, Near-White Blast Cleaned Surface Finish, of the National Association of Corrosion Engineers ("NACE Standard"). 40 C.F.R. § 761.79(b)(3)(i)(B). Proper decontamination under this standard would allow the non-porous items to be disposed of in a landfill or recycled as scrap metal, both of which are unrestricted uses.

42. On September 26, 2000, four transformer laminations and four fluorescent light ballast casings collected by an EPA inspector, which were a representative sample of a 540-cubic foot shipment awaiting pick-up by a metal recycler, failed to meet the NACE Standard.

43. The rest of the shipment from which the representative sample was collected was recycled as non-PCB contaminated metal, an "unrestricted use."

44. Based on EPA sampling and industry analyses, as well as pursuant to the presumption set forth in Paragraph 40, at least a significant proportion of the transformer laminations and fluorescent light ballast casings sampled contained, or are presumed to have contained, 50 ppm or greater concentration of PCBs.

45. Respondent's unrestricted disposal of lighting ballasts and transformer laminations containing PCBs above 100 ug/100 cm^2 or 50 ppm, as demonstrated by the failure of a representative sample to pass the NACE standard test and the failure of Respondent to otherwise demonstrate that the items did not contain PCBs, is a violation of 40 C.F.R. § 761.60(b)(6)(ii)(A).

COUNT V - Failure to Comply with Worker Protection Standards During Decontamination of PCB Waste (40 C.F.R.§ 761.79(e))

46. Paragraphs 1 through 24 above are hereby incorporated in this Count V by reference as if the same were set forth herein in full.

47. Under 40 C.F.R. § 761.79(e)(2), persons participating in decontamination activities for PCBs, which are regulated for disposal, shall wear or use protective clothing or equipment to protect against dermal contact or inhalation of PCBs or materials containing PCBs.

48. At the time of the September 26, 2000 inspection, Respondent's employees at the Facility engaged in the decontamination of non-porous surfaces (e.g., metals) in contact with non-liquid PCB materials at concentrations of greater than 50 ppm or 10 ug/100 cm^2 without wearing face or mouth protection, such as masks or filtered respirators.

49. The employees identified in Paragraph 48, above, were persons participating in decontamination activities within the meaning of 40 C.F.R. § 761.79(e)(2) because they were removing PCBs or materials containing PCBs regulated for decontamination pursuant to 40 C.F.R. §§ 761.60(b)(6)(ii)(A) and 761.79. As such, they should have been

wearing face or mouth protection, such as masks or filtered respirators, as well as other protective clothing or equipment.

50. Respondent violated the requirements of 40 C.F.R. § 761.79(e)(2) by not having its employees wear face or mouth protection while participating in decontamination activities.

IV. RESPONDENT'S ADMISSIONS

51. In accordance with 40 C.F.R. § 22.18(b)(2) and for the purpose of this proceeding, Respondent (i) admits that EPA has jurisdiction over the subject matter of this CC/CAFO and over Respondent; (ii) neither admits nor denies the specific factual allegations contained in the CC/CAFO; (iii) consents to any and all conditions specified in this CC/CAFO and to the assessment of the civil administrative penalty under Section V of this CC/CAFO; (iv) waives any right to contest the allegations contained in the CC/CAFO; and (v) waives the right to appeal the proposed final order contained in this CC/CAFO.

V. CIVIL ADMINISTRATIVE PENALTY

52. Respondent hereby consents to the assessment of a civil penalty in the amount of ELEVEN THOUSAND FOUR HUNDRED EIGHTY-ONE DOLLARS ($11,481), in conjunction with performance of the tasks set forth in Section VI of this CC/CAFO, as full, final, and complete settlement of the civil claims alleged in the CC/CAFO. The civil penalty shall be paid within thirty (30) days of the effective date of this CC/CAFO and according to the terms of this CC/CAFO. Payment shall be made by cashier's or certified

check payable to the "Treasurer, United States of America," and shall be sent by certified mail, return receipt requested, to the following address:

Mellon Bank
U.S. EPA Region IX Hearing Clerk
P.O. Box 360863M
Pittsburgh, PA 15251

The payment shall be accompanied by a transmittal letter identifying the case name, the docket number, and this CC/CAFO. Concurrent with delivery of the payment of the penalty, Respondent shall send a copy of the check and transmittal letter to the following addresses:

Regional Hearing Clerk
Office of Regional Counsel (ORC-1)
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Ivan Lieben
Office of Regional Counsel (ORC-2)
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

53. Payment of the above civil administrative penalty shall not be used by Respondent or any other person as a tax deduction from Respondent's federal, state, or local taxes.

54. In addition, failure to pay the civil administrative penalty may lead to the assessment of

Stipulated Penalties, as provided for by Section VIII, and/or any or all of the following actions:

a. The debt being referred to a credit reporting agency, a collection agency, or to the Department of Justice for filing of a collection action in the appropriate United States District Court. 40 C.F.R. §§ 13.13, 13.14, and 13.33. In any such collection action, the validity, amount, and appropriateness of the assessed penalty and of this CC/CAFO shall not be subject to review.

b. The debt being collected by administrative offset (i.e., the withholding of money payable by the United States to, or held by the United States for, a person to satisfy the debt the person owes the Government), which includes, but is not limited to, referral to the Internal Revenue Service for offset against income tax refunds. 40 C.F.R. Part 13, Subparts C and H.

c. EPA may (i) suspend or revoke Respondent's licenses or other privileges; or (ii) suspend or disqualify Respondent from doing business with EPA or engaging in programs EPA sponsors or funds. 40 C.F.R. § 13.17.

d. In accordance with the Debt Collection Act of 1982 and 40 C.F.R. Part 13, interest, penalties charges, and administrative costs will be assessed against the outstanding amount that Respondent owes to EPA for Respondent's failure to pay the civil administrative penalty within the deadline specified in Paragraph 52 or for payment of Stipulated Penalties within the deadline in accordance with Section VIII. Interest will be assessed at an annual rate that is equal to the rate of

current value of funds to the United States Treasury (i.e., the Treasury tax and loan account rate) as prescribed and published by the Secretary of the Treasury in the Federal Register and the Treasury Fiscal Requirements Manual Bulletins. 40 C.F.R. § 13.11(a)(1). Penalty charges will be assessed monthly at a rate of 6% per annum. 40 C.F.R. § 13.11(c). Administrative costs for handling and collecting Respondent's overdue debt will be based on either actual or average cost incurred, and will include both direct and indirect costs. 40 C.F.R. § 13.11(b). In addition, if this matter is referred to another department or agency (e.g., the Department of Justice, the Internal Revenue Service), that department or agency may assess its own administrative costs, in addition to EPA's administrative costs, for handling and collecting Respondent's overdue debt.

VI. OTHER CONDITIONS; MITIGATIVE TASKS

Supplemental Environmental Project

55. Respondent shall complete the following supplemental environmental project ("SEP"), which the parties agree is intended to secure significant environmental or public health protection and improvements. Respondent shall purchase 4 Bullard Model TIX Thermal Imagers with fire truck mounts and donate them to the Phoenix Fire Department ("PFD"). These Imagers are to help the PFD locate victims during response activities involving fires with burning PCBs or other contaminants, as burning PCBs result in dark, dense smoke. Respondent shall incur expenses of no less than FORTY-THREE THOUSAND FIFTY-FIVE DOLLARS ($43,055) in performing this SEP. This SEP must be completed

in accordance with the following conditions:

a. No later than thirty (30) days after the effective date of this CC/CAFO, Respondent shall submit to EPA a SEP Plan for completing the SEP that shall include the following:

   i. A brief explanation of how the equipment will be used to respond to or remediate the release of toxic or hazardous chemicals or compounds, such as PCBs;

   ii. A schedule for all specific actions necessary to complete the purchase and donation of the equipment to the PFD consistent with the ninety (90) day completion deadline set forth in Paragraph 55.b;

   iii. An identification of the specific PFD firehouses that will receive the Thermal Imagers, with at least one of the Thermal Imagers going to the particular firehouse with actual jurisdiction over the Facility; and

   iv. A certification that the PFD has approved the proposed donation and schedule for completing this SEP.

b. Respondent must complete the purchase and donation of the equipment within ninety (90) days of the effective date of this CC/CAFO. To the extent that this deadline cannot be met due to manufacturing delays, despite Respondent's best efforts to meet the deadline, Respondent shall so notify EPA prior to the deadline and propose a new deadline consistent with the manufacturer's schedule. The new proposed deadline will be considered the new deadline under this Paragraph,

unless EPA disapproves it pursuant to Section VII of this CC/CAFO.

56. Within ninety (90) days after the completion of the purchase and donation of emergency equipment set forth in Paragraph 55 of this CC/CAFO, Respondent shall submit to EPA a SEP Completion Report that includes the following:

a. A detailed description of the SEP as implemented;

b. Itemized costs;

c. Certification that the SEP has been fully implemented pursuant to the provisions of this CC/CAFO; and

d. Supporting documentation sufficient to verify expenses incurred by the Respondent in performing the SEP. This documentation shall include, but is not limited to, copies of receipts, invoices, purchase orders and/or contracts.

57. EPA acceptance of SEP Completion Report:

a. After receipt of the SEP Completion Report described in Paragraph 56, above, EPA will notify the Respondent, in writing, regarding:

i. Any deficiencies in the SEP Completion Report itself along with a grant of an additional fifteen (15) days for Respondent to correct any deficiencies in the Report and resubmit it to EPA (in accordance with Section VII);

ii. Any EPA determination that the project and SEP Completion Report have been completed satisfactorily; or

iii. Any EPA determination that the project has not been completed satisfactorily, which would allow EPA to seek Stipulated Penalties in accordance with Section VIII.

Under this Paragraph, a "satisfactorily" completed project means that (a) Respondent spent at least $43,055 on the purchase of the specified equipment, (b) that the equipment identified in Paragraph 55 was purchased and donated to the PFD with at least one of the Thermal Imagers going to the firehouse with jurisdiction over the Facility, (c) and that the SEP Plan and SEP Completion Report were drafted and submitted to EPA for review.

58. Any public statement, oral or written, in print, film, or other media, made by Respondent making reference to the SEP shall include the following language, "This project was undertaken in connection with the settlement of an enforcement action taken by the U.S. Environmental Protection Agency for alleged violations of the Toxic Substances Control Act."

59. Respondent hereby certifies that, as of the date of this CC/CAFO, Respondent is not required to perform or develop the SEP by any federal, state or local law or regulation; nor is Respondent required to perform or develop the SEP by any other agreement, grant or as injunctive relief in this or any other case. Respondent further certifies that it has not received, and is not presently negotiating to receive, credit in any other enforcement action for the SEP.

Compliance Schedule

60. The only reason for reducing the Facility's allowed storage under its TSCA PCB Approval to 7,645 gallons of PCB waste, as described in Paragraph 10, was because Salesco was seeking to reduce its financial assurance. Otherwise, the Facility still meets the physical design parameters to store at least 22,935 gallons of PCBs waste.

61. By entering this CC/CAFO, Respondent certifies that it is currently in compliance with the TSCA PCB storage, disposal and decontamination requirements of 40 C.F.R. Part 761 and its current TSCA PCB Approval.

62. Pending review of Onyx's renewal application for its TSCA PCB Approval, EPA hereby authorizes a Compliance Schedule for one year commencing from the effective date of this CC/CAFO whereby Respondent may store up to 22,935 gallons of PCB waste at any one time at its Facility if and only if Respondent complies with the following conditions:

a. *Financial Assurance.* As calculated in its September 12, 2003, closure cost estimate submitted to EPA, Respondent must maintain financial assurance of $148,620.52 for PCB waste storage of 22,935 gallons in accordance with the requirements of 40 C.F.R. § 761.65(f) and (g).

b. *Open House.* Within ninety (90) days of the effective date of this CC/CAFO, Respondent shall conduct an "open house" for members of the community and representatives of federal, state and local regulatory agencies. Such meeting, at a minimum, shall include a tour of the Facility, an explanation of the terms of this CC/CAFO, and a question-and-answer period. At least thirty (30) days prior to

this meeting, Respondent shall provide appropriate notice of the open house to the public and relevant federal, state, and local regulatory agencies. Appropriate notice means, at a minimum, direct notification to community groups interested in South Phoenix environmental and community issues, publication in a paper of local distribution, and direct notice to the appropriate federal, state and local regulatory agencies, including but not limited to EPA, Arizona Department of Environmental Quality, Maricopa County Environmental Services Department, and the City of Phoenix.

c. *Third-Party Audit.* Respondent must have an independent third-party auditor conduct an audit ("Audit") of its Facility to review all aspects of its compliance with the storage, disposal and decontamination requirements of 40 C.F.R. Part 761 and its TSCA PCB Approval, in the following manner:

i. The Audit must be performed between 8 and 10 months of the effective date of this CC/CAFO.

ii. The Audit shall review the Facility's compliance status with the storage, disposal and decontamination requirements for PCBs and PCB Items of the TSCA regulations at 40 C.F.R. Part 761 Subpart D and of Respondent's TSCA PCB Approval. The Audit shall include all necessary testing, including but not limited to testing to determine a compliance with the NACE Standard pursuant to 40 C.F.R. § 761.79(b)(3)(i)(B) and appropriate wipe samples for a representative sample of separated metals

destined for recycling that have been through the decontamination process.

iii. *Audit Plan:* Respondent shall submit an Audit Plan at least sixty (60) days prior to commencing the audit to EPA for review and approval, consistent with the procedures set forth in Section VII. The Audit Plan shall include, at a minimum, the following:

(1) An identification of the third party auditor:

(2) An outline of the methodology of the audit;

(3) A description of the manner of investigation;

(4) An identification of the scope of the review;

(5) A discussion of the specific actions to be taken; and

(6) A plan of action for any areas of concern discovered through the audit.

If EPA fails to comment on the Audit Plan pursuant to Section VII by the time that Respondent has planned to commence the Audit, the Audit Plan is deemed approved by the EPA. If EPA identifies deficiencies pursuant to Section VII of this CC/CAFO, the commencement date of the Audit as specified in Paragraph 62.c.i will be tolled until such time that there is a fully approved Audit Plan.

iv. *Audit Completion Report.* Within sixty (60) days after the completion of the Audit, Respondent shall submit a copy of the Audit Completion

Report to EPA for review and approval consistent with the procedures set forth in Section VII. The Audit Completion Report shall include at a minimum the following information:

(1) The factual findings of the Audit;

(2) A specific identification and description of any instances of non-conformance with the storage, disposal and decontamination requirements of 40 C.F.R. Part 761 Subpart D and the TSCA PCB Approval;

(3) A description of any and all corrective action taken in response to the findings of the Audit; and

(4) A discussion of how Onyx will maintain compliance in the future.

v. *Submission of Audit Completion Report to the Library:* Within thirty (30) days of final approval by EPA of the Audit Completion Report, Respondent shall submit a copy of the Report to the Ocotillo and Desert Sage Branches of the Phoenix Public Library to be maintained as a public document for review by interested members of the public.

63. *Compliance Schedule Extensions.*

a. If EPA has not acted on Onyx's April 11, 2003 application for an EPA TSCA PCB Approval renewal pursuant to 40 C.F.R. Part 761 by the end of the initial year-long Compliance Schedule period, Respondent may request in writing to EPA an additional six (6) month extension of the Compliance Schedule period.

This request must be submitted at least thirty (30) days before the termination of the Compliance Schedule period.

b. Respondent may request additional six (6) month extensions as long as it submits its request for further extensions at least thirty (30) days before the termination of the last Compliance Schedule extension period.

c. Compliance Schedule extensions become effective only upon written approval by EPA of Respondent's extension request(s). However, upon the submission of a request for an extension by Respondent, the termination date of the last Compliance Schedule extension period will be tolled until such time as EPA provides written notification to Respondent as to whether the extension request is approved or disapproved.

d. In the event that EPA disapproves Respondent's extension request, Respondent shall have a fourteen (14) day grace-period to continue storing 22,935 gallons of PCB waste before it must comply with its approved storage quantity of 7,645 gallons of PCB waste in order to provide appropriate time for Respondent to dispose of the extra PCB waste.

64. Upon a determination that Onyx is not complying with the requirements of this CC/CAFO, 40 C.F.R. Part 761, or its current TSCA PCB Approval, at its unreviewable discretion, EPA may terminate the Compliance Schedule in writing. The decision to terminate the Compliance Schedule in no way prohibits, alters or limits the ability of EPA to seek Stipulated Penalties or any other remedies or sanctions available by virtue of

Respondent's violation of the terms of the Compliance Schedule. Moreover, Respondent must still comply with the requirements of Paragraph 62.b and 62.c. notwithstanding the termination of the remaining period of the Compliance Schedule.

VII. REVIEW OF SUBMISSIONS

65. After review of any plan, report or other item which is required to be submitted for approval pursuant to this CC/CAFO, EPA shall:

    a. approve, in whole or in part, the submission;

    b. approve the submission upon specified conditions; or

    c. disapprove, in whole or in part, the submission, with an identification of any deficiencies.

66. In the event of approval or approval upon conditions, pursuant to Paragraph 65.a or 65.b, Respondent shall proceed to take any action required by the plan, report, or other item, as approved by EPA. EPA shall retain its rights to seek Stipulated Penalties, as provided in Section VIII.

67. *Resubmission of Plans.*

    a. Upon receipt of a notice of disapproval pursuant to Paragraph 65.c, Respondent shall, within fifteen (15) days or such longer time as specified in such notice, correct the deficiencies and resubmit to EPA the plan, report, or other item for review and approval. Any Stipulated Penalties applicable to the submission, as provided for by Section VIII, shall accrue during the 15-day or otherwise specified period, but shall not be payable unless the resubmission is disapproved as

provided in Paragraph 65.d.

b. Notwithstanding the receipt of a notice of disapproval pursuant to Paragraph 65.c, Respondent shall proceed, at the direction of EPA, to take any action required by any portion of the submission which has not been disapproved. Such implementation of any portion of a submission shall not relieve Respondent of any liability for Stipulated Penalties under Section VIII.

c. *Informal Meeting*: If Respondent disagrees with the deficiencies identified by EPA pursuant to Paragraph 65.c, prior to the end of the fifteen (15) day period set forth in Paragraph 67.a, Respondent may request an informal meeting with EPA representatives to discuss the deficiencies. This request for a meeting must also include a written statement as to why Respondent disagrees with EPA as to the identified deficiencies.

i. EPA shall meet with Respondent to discuss the deficiencies and consider Respondent's claims.

ii. Respondent shall have fifteen (15) days after the meeting to correct the deficiencies identified in EPA's original disapproval of Respondent's submittal, and resubmit to EPA the plan, report, or other item for review and approval. However, during this fifteen (15) day period, at its discretion and based upon information presented by Respondent, EPA may amend its original disapproval by converting it to an approval or clarifying the nature of the identified deficiencies. Respondent shall have an

additional ten (10) days from issuance of a revised disapproval by EPA to correct the identified deficiencies and resubmit to EPA the plan, report, or other item.

iii. Any Stipulated Penalties applicable to the submission, as provided for by Section VIII, shall accrue during the period set forth in this Paragraph, but shall not be payable unless the resubmission is disapproved as provided in Paragraph 65.d.

d. In the event that a resubmitted plan, report or other item, or portion thereof, is disapproved by EPA, EPA may again require Respondent to correct the deficiencies, may immediately seek payment of Stipulated Penalties under Section VIII, and/or may take any action necessary to enforce the provisions of this CC/CAFO.

VIII. STIPULATED PENALTIES

68. *Civil Penalty.* If Respondent fails to pay the civil administrative penalty specified in Paragraph 52 of this CC/CAFO within thirty (30) days after the effective date of this CC/CAFO, then Respondent shall pay to EPA the Stipulated Penalty of $500 a day for every day after the 30-day period. Stipulated Penalties under this Paragraph will continue to accrue until such time Respondent pays the civil penalty plus any accrued Stipulated Penalties and interest for the late payment of the penalty.

69. *Stipulated Penalties for Failure to Comply with Section VI of CC/CAFO.* In the event that Respondent fails to comply with any of the terms or provisions of this CC/CAFO

relating to the performance of the SEP or the terms of the Compliance Schedule or if the actual expenditures for the SEP do not equal or exceed the cost of the SEP described in Paragraph 55, Respondent shall be liable for Stipulated Penalties according to the provisions set forth below:

a. Except as provided in subparagraph b immediately below, for a SEP which has not been completed satisfactorily, as defined in Paragraph 57.a, pursuant to this CC/CAFO, Respondent shall pay a Stipulated Penalty to the United States in the amount of $60,000.

b. If the SEP is not completed in accordance with Paragraphs 55-58, but the Complainant determines that the Respondent: a) made good faith and timely efforts to complete the project, and b) Respondent certifies, with supporting documentation, that at least 95 percent of the amount of money which was required to be spent was expended on the SEP, Respondent shall not be liable for any Stipulated Penalty. The determination of whether the SEP has been satisfactorily completed, as defined in Paragraph 57.a, and whether the Respondent has made a good faith, timely effort to implement the SEP shall be in the unreviewable sole discretion of EPA.

c. For failure to comply with any SEP or Compliance Schedule requirements, unless otherwise indicated by Paragraphs 67.a or 67.c, such as the submission of a plan or report or the holding of the open house, by the

deadlines set forth in Section VI, Respondent shall pay a Stipulated Penalty in the amount of $500 for each day after the applicable due date of the requirement until Respondent has complied with the requirement.

d. For failure to adequately address report or plan deficiencies identified by EPA in accordance with Paragraph 67.d, Respondent shall pay a Stipulated Penalty in the amount of $250 for each day after the disapproval date until Respondent has corrected the identified deficiency.

70. Respondent shall pay Stipulated Penalties not more than fifteen (15) days after receipt of written demand by EPA for such penalties. Method of payment shall be in accordance with the provisions of Paragraph 52. Interest and late charges shall accrue as stated in Paragraph 54 for any delay in the payment of a Stipulated Penalty. At its unreviewable discretion, EPA may decide to waive some or all of the Stipulated Penalties due under this CC/CAFO.

71. Nothing in this Section prohibits, prevents, or alters EPA's ability to pursue additional action for non-compliance with the requirements of this CC/CAFO, including but not limited to the imposition of civil penalties, a motion seeking compliance with this CC/CAFO, or the imposition of the additional sanctions described in Paragraph 54.

IX. GENERAL TERMS

72. Respondent shall retain, and shall instruct its contractors and agents to preserve, all non-identical copies of all records and documents (including records or documents in electronic form) in its or its contractors' or agents' possession or control, or that come

into its or its contractors' or agents' possession or control, and that relate in any manner to Respondent's performance of its obligations under this CC/CAFO, for a period of at least 3 years from when the record or document was created. At any time during this record-retention period, EPA may request copies of any documents or records required to be maintained under this Paragraph. Respondent shall provide the requested documentation not more than fifteen (15) days after a request for such information by EPA.

73. Nothing in this CC/CAFO shall be construed as prohibiting, altering or in any way limiting the ability of EPA to seek any remedies or sanctions available by virtue of Respondent's violation of this CC/CAFO or of the statutes and regulations upon which this agreement is based, or for Respondent's violation of any other applicable provision of law, including any violation discovered during the audit performed pursuant to Paragraph 62.c.

74. All submissions required to be made pursuant to this CC/CAFO shall be sent by certified mail, with return receipt requested, to:

Chief, Toxics Section (CMD-4-2)
Cross Media Division
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

75. All notices, records, and submissions required in this CC/CAFO which purport to document compliance with the terms of this Agreement shall contain a Certification

77. This CC/CAFO does not exempt, relieve, modify, or affect in any way Respondent's duty to comply with all applicable federal, state, and local laws, regulations, rules, ordinances, and permits.

XI. ATTORNEYS' FEES AND COSTS

78. Each party shall bear its own attorneys' fees, costs, and disbursements incurred in this proceeding.

XII. EFFECTIVE DATE

79. In accordance with 40 C.F.R. §§ 22.18(b)(3) and 22.31(b), this CC/CAFO shall be effective on the date that the final order contained in this CC/CAFO, having been approved and issued by either the Regional Judicial Officer or Regional Administrator, is filed.

XIII. BINDING EFFECT

80. The undersigned representative of Complainant and the undersigned representative of Respondent each certifies that he or she is fully authorized to enter into the terms and conditions of this CC/CAFO and to bind the party he or she represents to this CC/CAFO.

81. The provisions of this CC/CAFO shall apply to and be binding upon Respondent and its officers, directors, employees, agents, trustees, servants, authorized representatives, successors, and assignees

FOR RESPONDENT ONYX SPECIAL SERVICES, INC.:

17 September 2003
DATE

Greig R. Siedor
By: GREIG R. SIEDOR
Title: SECRETARY
Address: 700 E. BUTTERFIELD RD., Suite 201
LOMBARD IL 60187

FOR COMPLAINANT EPA REGION IX:

9/26/03
Date

ENRIQUE MANZANILLA, Director, Cross Media Division
United States Environmental Protection Agency, Region IX

II. FINAL ORDER

EPA Region IX and Onyx Special Service, Inc. having entered into the foregoing ConsentAgreement,

IT IS HEREBY ORDERED that this CC/CAFO (Docket No. TSCA-09-2003-0006) be entered, and Respondent shall pay a civil administrative penalty in the amount of $11,481.25 and otherwise comply with the terms set forth in the CC/CAFO.

9/26/03
DATE

JOANNA DELUCIA
Regional Judicial Officer
United States Environmental Protection Agency, Region IX

CERTIFICATE OF SERVICE

I certify that the original and one copy of the foregoing Consent Agreement and Final Order was hand delivered to:

The Regional Hearing Clerk
United States Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, California 94105

and that a true and correct copy of the Consent Agreement and Final Order was placed in the United States Mail, certified mail, return receipt requested, addressed to the following:

Greig Seidor, Esq.
Onyx Special Services, LLC
700 East Butterfield Road, Suite 201
Lombard, Illinois 60148

Dated: 9-29-03 By: Danielle E Carr

DANIELLE CARR
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region IX

ATTACHMENT V

A. Veolia's Response to EPA R9's Letter dated October 15, 2010.

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

March 17, 2008 and
September 16, 2010

VEOLIA
ENVIRONMENTAL SERVICES

TECHNICAL SOLUTIONS
NORTH AMERICA

October 15, 2010

Mr. Christopher Rollins
Environmental Protection Specialist
US Environmental Protection Agency Region IX
75 Hawthorne Street, WST-3
San Francisco, CA 94105

RE: Response to questions and or requests resulting from the September, 2010 EPA Compliance Inspection,Veolia ES Technical Solutions, L.L.C., 5736 W Jefferson St, Phoenix, AZ EPA Identification Number AZ0 000 337 360

Dear Mr. Rollins:

Veolia ES Technical Solutions, L.L.C. (Veolia) is hereby submitting a response to your questions and or requests that arose during the September, 2010 USEPA inspection at the Veolia Phoenix Facility. The response follows your question or concern. Enclosures are included as requested.

1) EPA recommends that you replace the PCB label outside Building 2 and provide a picture of the newly labeled outer door (See Photo 1). Please note, the regulations allow the use of a PCB label that has Black text over a yellow or white background (Sun Fading). However, the format and wording must remain the same.

See enclosed photographs of the replaced markings as recommended.

2) Please proved a Standard Operating Plan ("SOP") for your procedures regarding the receipt of PCB waste in Building 2. Please provide a SOP for labeling unmarked PCB drums that are received.

A separate receiving SOP does not exist for PCB waste. All drums are routinely checked during inspections to assure they are properly marked. Please refer to enclosed inspection forms and copy of Veolia Hazard Communication protocol. Employees are trained on waste recognition and proper marking techniques per DOT requirements.

3) There were approximately 6 drums from 1 WIR000000356) that were in your receiving area during the inspection that were not labeled by the generator. Now that you have had time to process the waste, the drums should be properly labeled with the ML mark. Please provide EPA with pictures of the newly labeled drums. Or if the material has been shipped off for disposal, a copy of the outgoing manifest for the material.

Veolia ES Technical Solutions, L.L.C.
5736 W Jefferson Street, Phoenix, AZ 85043
tel: 602 233 2955 - toll free: 800 368 9095 - fax: 602 415 3030
www.VeoliaES.com

See enclosed photos of the drums that Veolia marked prior to putting into storage and the manifest for drums that have already been processed, repackaged and shipped.

4) EPA recommends that a PCB label be placed on the vacuum in Building 2 used to clean up PCB waste on the decontamination line(See Photo 2). Please provide a picture of the vacuum with a new PCB label on its exterior.

Enclosed is a picture of the vacuum with the PCB marking.

5) Were you able to determine whether the PCB wipe samples that Veolia collected in 2008 were analyzed or not? If so, please provide me a copy of the analytical data.

Enclosed are copies of the 2008 analytical and a report summarizing the results, actions, and post cleaning analytical. This information along with suggested modifications to building 2 and 3 was previously submitted to the EPA in 2008.

6) EPA would like to request Veolia's incoming 2007 manifests for April, May and July.

Enclosed is a disk of the requested manifests for your review.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

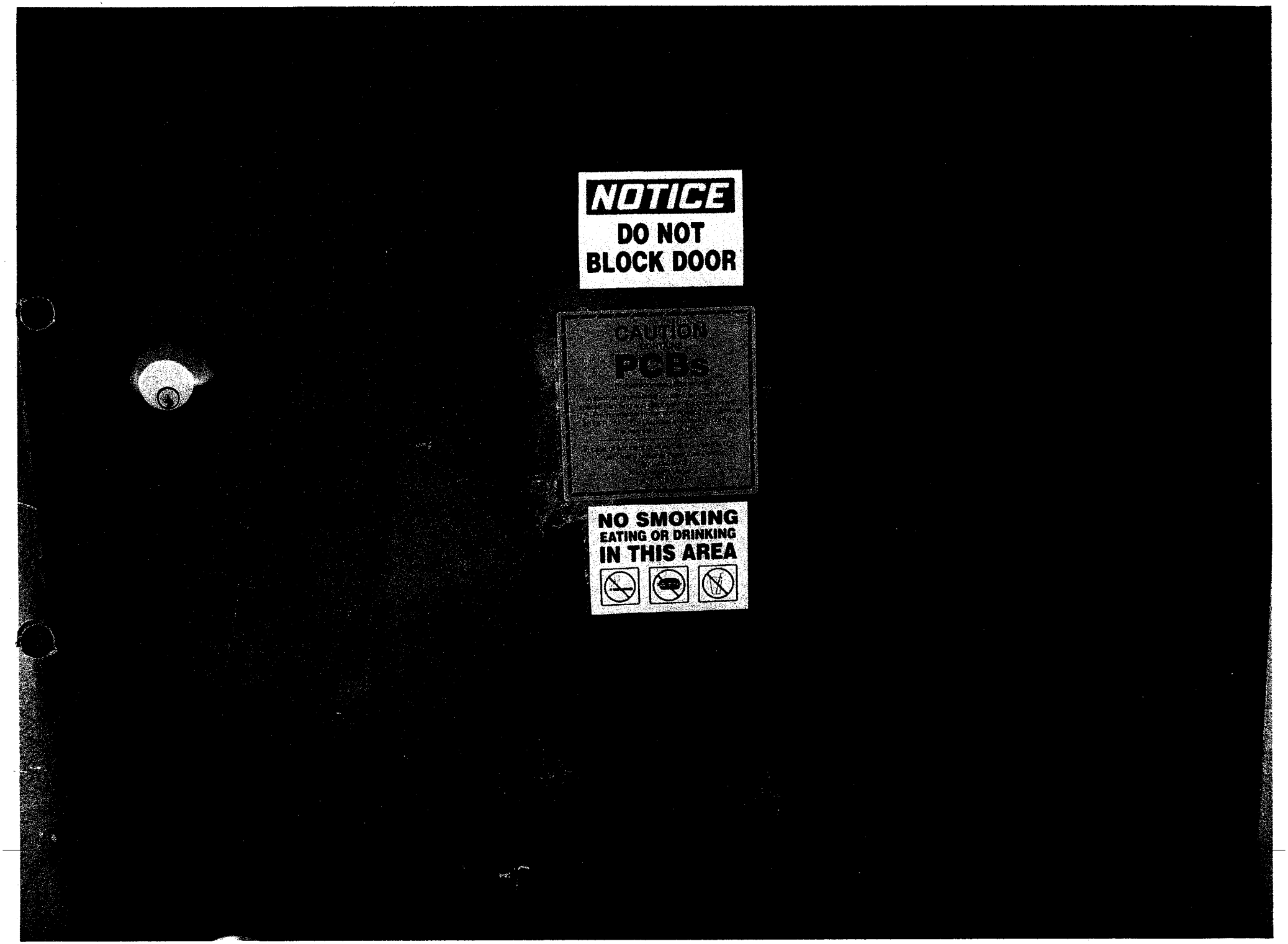
If you have any questions or need additional information please contact me at 602-233-2955.

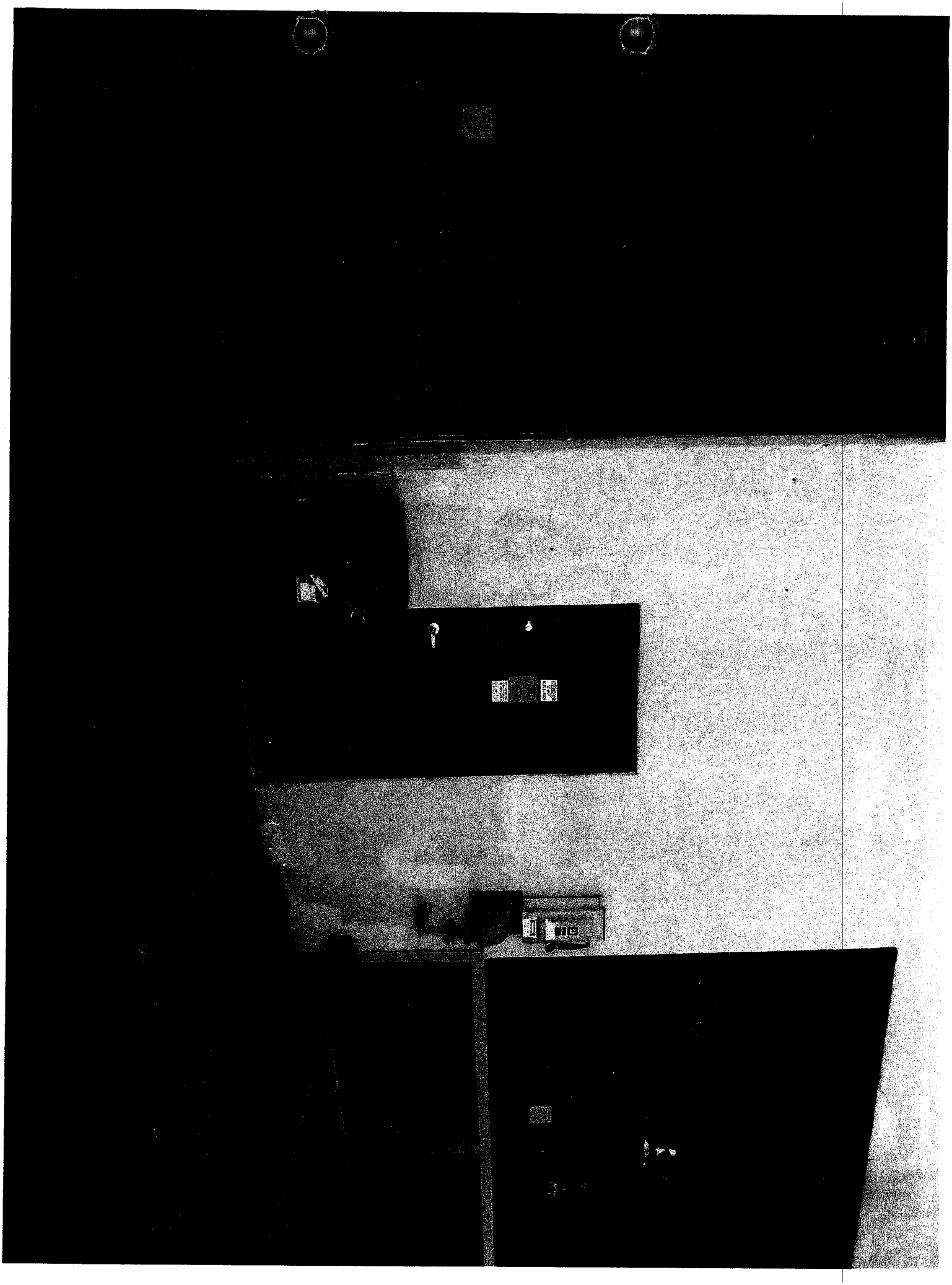
Sincerely,

Veolia ES Technical Solutions, L.L.C.

Wayne Bulsiewicz
EHS Manager, Phoenix, AZ

Cc: James D Harrison
John McShane
Phil Ditter


NOTICE
DO NOT
BLOCK DOOR
CAUTION
PCBs
NO SMOKING
EATING OR DRINKING
IN THIS AREA



VEOLIA
ENVIRONMENTAL SERVICES

SAFETY INSPECTIONS AND AUDIT

BUILDING 2

RECEIVING / PROCESS TANKS / STORAGE AREA

Inspector Name: _____ **Signature:** _____ **Date:** _____ **Time:** _____

ITEM	Y	N	N/A	COMMENT
EGRESS/HOUSEKEEPING				
Walkway, routes, exit doors clearly marked?				
Access to egress points clear and free of obstructions?				
Thresholds under overhead fire doors free from any obstructions?				
Access to emergency/Spill equipment clear and free of obstructions?				
Are doors and openings that are not exits clearly marked "NOT AN EXIT"?				
Are walking surfaces clear and not slippery?				
Are walkways/aisles clear and free of obstructions, debris?				
Is housekeeping neat, free of clutter?				
Are walking and working areas adequately illuminated?				
Is Dock #2 clean and free of dirt and debris?				
HAZARD COMMUNICATION				
Security gate operable and warning signs posted?				
Are hazard labels present on hazardous materials?				
Are PPE requirements posted where necessary?				
Are all personnel wearing the required PPE?				
WASTE STORAGE AREA				
Containers in good condition (no leakers, bulgers, damaged containers), labeled, and properly closed?				
Area free of leaks, spills, and debris?				
Are containers stacked properly; no leaners?				
Storage area properly labeled?				
Proper aisle space maintained and container labels inspectable?				
Liquid waste and liquid raw materials stored within secondary containment?				
No ignitables (D001), reactives (D003) stored within 50' of property line?				
MATERIAL STORAGE/HANDLING				
Are MSDSs for **ALL** materials available and in a central location?				
Is PBS bath free of any visible leaks and damage?				
Is process tank free of visible leaks and damage?				
Are inspections up to date on material handling equipment?				

Inspector Name: _____				Date: _____ Time: _____
ITEM	**Y**	**N**	**N/A**	**COMMENT**
ELECTRICAL				
Are extension cords being used as permanent wiring?				
Are electrical outlets overloaded?				
Do circuit breaker panels identify the circuit they control?				
Are electrical panel doors closed?				
Is there free access to electrical panels?				
Are flexible cords in good condition, free from splices, frays, exposed wiring, or insulation separation?				
FIRE PREVENTION				
Are emergency exits labeled?				
Are inspection tags on fire extinguishers up to date?				
Are fire extinguishers in their proper locations?				
Are fire extinguishers fully charged and operable?				
Are flammable liquids stored in approved containers, storage cabinets, or areas designated for such storage?				
EMERGENCY RESPONSE				
Are all communication devices operable and accessible?				
Are there any visible spills or leaks?				
Is emergency response equipment in its proper location and properly labeled?				
Is the supply of emergency response equipment adequate?				
Inspect secondary containment devices. No evidence of cracks, gaps, damage?				
Does eyewash station have adequate water pressure for use?				
POLLUTION PREVENTION				
Review waste containers. Is non-hazardous waste being segregated from hazardous waste?				
CONTRACTORS				
Are contractors informed of hazards in work area?				
Are contractors adhering to Veolia "Contractor Safety Rules"?				
ADDITIONAL COMMENTS / CONCERNS				
1.				
2.				
3.				

Note: All discrepancies must be documented and corrective actions noted. Submit form to your supervisor upon completion.

VEOLIA
ENVIRONMENTAL SERVICES

SAFETY INSPECTIONS AND AUDIT
BUILDING 3
BALLAST LINE / STORAGE AREA

Inspector Name: _____ Signature: _____				Date: _____ Time: _____
ITEM	**Y**	**N**	**N/A**	**COMMENT**
EGRESS/HOUSEKEEPING				
Walkway, routes, exit doors clearly marked?				
Access to egress points clear and free of obstructions?				
Thresholds under overhead fire doors free from any obstructions?				
Access to emergency equipment clear and free of obstructions?				
Are doors and openings that are not exits clearly marked "NOT AN EXIT"?				
Are walking surfaces clear and not slippery?				
Are walkways/aisles clear and free of obstructions, debris?				
Is housekeeping neat, free of clutter?				
Are walking and working areas adequately illuminated?				
Is Dock #3 clean and free of dirt and debris?				
HAZARD COMMUNICATION				
Are Security gates operable and warning signs posted?				
Are PPE requirements posted where necessary?				
Are all personnel wearing the required PPE?				
Are labels present on process / stored materials?				
Are MSDS's for **ALL** materials available and in a central location?				
WASTE STORAGE AREA				
Containers in good condition (no leakers, bulgers, damaged containers), labeled, and properly closed?				
Area free of leaks, spills, and debris?				
Are containers stacked properly; no leaners?				
Storage area properly labeled?				
Liquid waste and liquid raw materials stored within secondary containment?				
Proper aisle space maintained and container labels inspectable?				

Inspector Name: _____				Date: _____ Time: _____
ITEM	**Y**	**N**	**N/A**	**COMMENT**
MATERIAL STORAGE/HANDLING				
Are inspections up to date on material handling equipment?				
Are all drums stacked correctly with labels facing out?				
ELECTRICAL				
Are extension cords being used as permanent wiring?				
Are electrical outlets overloaded?				
Do circuit breaker panels identify the circuit they control?				
Are electrical panel doors closed?				
Is there free access to electrical panels?				
Are flexible cords in good condition, free from splices, frays, exposed wiring, or insulation separation?				
FIRE PREVENTION				
Are emergency exits labeled?				
Are inspection tags on fire extinguishers up to date?				
Are fire extinguishers in their proper locations?				
Are fire extinguishers fully charged and operable?				
EMERGENCY RESPONSE				
Are all communication devices operable and accessible?				
Are there any visible spills or leaks?				
Is emergency response equipment in its proper location and properly labeled?				
Is the supply of emergency response equipment adequate?				
Inspect secondary containment devices. No evidence of cracks, gaps, damage?				
Does eyewash station have adequate water pressure for use?				
POLLUTION PREVENTION				
Review waste containers. Is non-hazardous waste being segregated from hazardous waste?				
CONTRACTORS				
Are contractors informed of hazards in work area?				
Are contractors adhering to Veolia "Contractor Safety Rules"?				
PROPOSED RESOLUTIONS TO DEFICIENCIES				
1.				
2.				

Note: All discrepancies must be documented and corrective actions noted. Submit form to your supervisor upon completion.

VEOLIA ENVIRONMENTAL SERVICES	**TITLE:** Hazard Communication	**NUMBER:** III-2
	INITIATED BY: Mike Richter	**EFFECTIVE DATE:** December 19, 2003
APPROVED BY: Mike Richter	**TITLE:** Director of Health & Safety	**SUPERSEDES:** Hazard Communication: June 6 2002

REQUIRED FORMS: Appendix A--General Information on Various Classes of Chemicals, Appendix B--National Fire Protection Association (NFPA) 704 Identification of The Fire Hazards of Materials, Appendix C--Understanding Material Safety Data Sheets, and Appendix D--Hazard Definitions

PURPOSE: To define the minimum requirements and responsibilities for the proper communication of hazards posed by chemicals in the workplace, and to ensure this information is accessible to Veolia Environmental Services employees and its contractors.

● **Complete** ○ **Needs Review** ○ **In-Process**

2.0 Scope:

This program applies to all employees and contractors within Veolia Environmental Services that handle or come in contact with hazardous chemicals.

3.0 Regulatory Compliance Applicability:

This program serves as Veolia Environmental Services' written Hazard Communication Program with the exception of the site/branch location's chemical inventory lists. This program complies with 29 CFR §1910.1200, Hazard Communication, 29 CFR Part 1910 Subpart Z, Toxic and Hazardous Substances, 29 CFR 1926.59 Hazard Communication and 29 CFR 1926 Subpart Z Toxic and Hazardous Substances. **Note: Most of the chemicals and substances handled by Veolia employees are classified as hazardous wastes under the Resource Conservation and Recovery Act (RCRA), and are therefore excluded from the scope of this standard in accordance with 29 CFR §1910.1200 (b)(6)(i).**

4.0 Responsibility:

The Regional/Branch Health and Safety Manager or designee is responsible for the development, implementation, and periodic review of this program. In addition, they serve as the primary administrative contact for the program.

5.0 Program Elements:

5.1 Hazard Determination:

A. Most chemicals handled within Veolia are considered to be hazardous according to the criteria of the hazard communication standard, unless determined to be non-hazardous by the Regional/Branch Health and Safety Manager or designee as determined below (5.1.B.) or by the manufacturer of the chemical.

B. The Regional/Branch Health and Safety Manager or designee will review the criteria in 29 CFR §1910.1200(d) as specified in material safety data sheets and other information sources to determine a chemical's hazardous

properties. Other sources noted in Appendix C of 29 CFR §1910.1200 as well as various MSDS Online Database systems, the MEDLARS Hazardous Substance Database, or generically published MSDSs such as those published by Genium Publishing, may also be utilized in making the determination.

C. Veolia incorporates different methods and observations (human senses) to detect the presence or release of hazardous chemicals in the work place.

1. The various warning properties of the classes of chemicals may help to detect a problem. The methods available to detect a leak or release include the following:

- A visible pool of liquid around the base of a drum or container.
- Visible liquid on the side of a drum or container
- Unusual odors present in the work area.
- Unusual hissing or bubbling sounds signifying escaping gas or other pressurized material.
- Formation of vapor clouds.

2. The use of monitoring equipment to measure personal employee exposure and vapor concentrations in air in a given area.

5.2 Chemical Listing:

A. A chemical inventory listing of non-RCRA hazardous materials for each site/branch should be appended to this program.

B. General classes of chemicals handled by Veolia can be found in Appendix A of this program.

5.3 Material Safety Data Sheets:

A. The Regional / Branch Health & Safety Manager or designee has the responsibility for:

1. Ensuring that MSDS's are maintained or developed for all non-RCRA regulated chemicals and chemical products received or produced at the facility.

2. Providing MSDSs to employees, contractors, visitors or customers upon request.

3. Ensuring employees who purchase chemical products obtain and forward all MSDSs they receive to the Regional/Branch Health & Safety Manager or designee. If an MSDS is not received with the first shipment, and one is needed, the manufacturer or distributor of the material must be contacted by the employee that obtained the material and a copy of the appropriate MSDS requested.

4. Ensuring contractors that bring hazardous materials onto Veolia locations supply MSDSs for those materials upon request of an Veolia employee. Likewise, copies of MSDS's must accompany any hazardous materials brought to client sites by Veolia employees.

5. Maintaining MSDSs in a readily accessible location to employees.B.

The procedure for maintaining the MSDS file is as follows:

When an MSDS is received, the MSDS file is checked to determine whether an MSDS is on file for the material in question. If no MSDS exists, a copy is placed on file. The chemical inventory list is then updated as new materials are obtained.

B. The procedure for maintaining the MSDS file is as follows:

When an MSDS is received, the MSDS file is checked to determine whether an MSDS is on file for the material in question. If no MSDS exists, a copy is placed on file. The chemical inventory list is then updated as new materials are obtained.

5.4 Labeling:

A. Non-RCRA hazardous material containers should be labeled in accordance with 29 CFR §1910.1200 (f) "Labeling and other forms of warning". This includes providing the identity of the hazardous chemical(s) and the appropriate hazard warning; and the name and address of the manufacturer or other responsible party. Appropriate hazard warnings may include the use of words, pictures, symbols, or a combination of these.

B. An acceptable form of hazard warning used by Veolia is the NFPA 704, Identification of the Fire Hazards of Materials system. The NFPA 704 system:

1. Identifies the hazards of a material in terms of four categories; "Health", "Flammability", "Reactivity" and "Special Hazards". The severity of each category is rated on a scale from 0-4 (indicating no special hazard to a severe hazard).

2. Utilizes a diamond marking that is sub-divided into four equal smaller diamonds. The Health section is colored blue and is on the left side of the diamond. The Flammability section is colored red and is the top of the diamond. The Reactivity section is colored yellow and is on the right side of the diamond. The Special Hazard section is colored white and is at the bottom.

3. Is detailed in Appendix B.

C. All employees have the responsibility to ensure containers or vessels of hazardous materials are properly labeled and that those labels are not removed or defaced.

5.5 Employee Information and Training:

A. Training is provided to all employees who handle or come in contact with hazardous chemicals. The training is conducted by the Veolia Training Department, Region/Branch Health and Safety Managers, Project Managers or other qualified staff. At a minimum, employees are trained in hazard communication:

1. During orientation.
2. Annually.
3. When new data is made available on current chemical hazards.

4. Whenever a new hazard is introduced into the workplace.

B. Contractors/Visitors will be informed of the hazards of the chemicals that they may encounter in the workplace by their Veolia representative.

C. When employees are performing non-routine tasks (such as stabilizing reactive wastes using various chemicals), the Regional/Branch Health and Safety Manager, Project Manager or designees will have the responsibility of informing employees of the potential hazards of chemicals they might be handling.

D. First line supervisors will have the responsibility to ensure that employees are trained on new chemicals that enter the workplace. This will be done by reviewing MSDS's, highlighting hazards, reviewing required PPE, etc.

E. Training includes the following:

1. The health and physical hazards associated with all chemicals found in the work area. This includes a review of the use and understanding of Material Safety Data Sheets, and other information sources. Refer to Appendix C, Understanding Material Safety Data Sheets and Appendix D, Hazard Definitions.

2. Measures the employees can take to protect themselves from the hazard.

3. The tasks associated with handing, processing and storing hazardous chemicals.

4. Procedures for conducting basic hazard assessments of work environments and determining proper PPE or other control measures.

5. Explanation of the requirements of the HazCom standard and how Veolia's Hazard Communication Program operates.

6. Instructions on how to read and interpret information on labels and Material Safety Data Sheets (MSDS).

7. Information on the location of the written hazard communication plan and how employees can obtain and use the available hazard information.

8. Explanation of the specific procedures and requirements that Veolia has put into effect to provide protection, such as safe work practices, emergency procedures, and the use of personal protective equipment.

9. Information on methods and observations workers can use to detect the presence of a hazardous chemical to which they may be exposed.

10. Explanation of the existence, location and availability of employee medical records, their rights as employees to access those records and the person responsible for maintaining those records.

F. All labels and other forms of warnings that appear on containers shall be prominently displayed, legible, and in English. These warnings shall be readily available to all employees throughout their work shift as described in the written program. In Veolia locations where all employees speak, read, and

write English, training and labels shall be provided in English.

In locations where not all employees speak English, training, labels and warnings shall be provided in the appropriate language or languages to accommodate non-English speaking employees. Translations of English labels, warnings, and Training Materials shall be made available as necessary based on Employee requests, whenever necessary.

5.6 Training on the HazCom Program should be documented and include employee attendance and documentation of training materials. Training documentation should also be kept in employee's training files.

6.0 Program Checklist:

6.1 The program shall be evaluated according to the following checklist items:

A. Do branch location safety and health personnel have access to hazard information sources such as MSDS Databases like MEDLARS Hazardous Substance Database, generically published MSDSs, or other literature to enable them to conduct hazard determinations on potentially hazardous chemicals?

B. Has a chemical inventory list of non-RCRA hazardous materials been developed at each site/branch? Is it appended to this program?

C. Are MSDSs for non-RCRA hazardous materials on file? (Evaluate by selecting materials at location and check for MSDSs). Are the MSDSs accessible to all employees at that location?

D. Are all hazardous material containers labeled? Are they labeled in accordance with this program?

E. Are employees knowledgeable in the hazards of the materials they are handling? Do they know where or how to obtain information on the hazards?

F. Do employees know of the methods and observations they can use to detect the presence of a hazardous substance to which they may be exposed?

APPENDIX A

GENERAL INFORMATION ON VARIOUS CLASSES OF CHEMICALS

GENERAL INFORMATION ON VARIOUS CLASSES OF CHEMICALS

Hydrocarbons

A. General Information

Hydrocarbons are composed of, as their name indicates, hydrogen and carbon. They are found as gases, liquids or solids. Veolia typically handles three classes of hydrocarbons:

Aliphatic Aromatic Halogenated

The aliphatic hydrocarbons are a series of straight and branched chain hydrocarbons, including alkanes (C_nH_{2n+2}, saturated) and alkenes (C_nH_{2n}, one double bond). The aliphatics with at least one double bond are also known as olefins.

The aromatic hydrocarbons are a series of cyclic compounds that are based on benzene as the parent compound. They may be monocyclic or polycyclic and differ from one another not only in the number of rings, but also in the degree and placement of alkyl or halogen substitutions.

The halogenated hydrocarbons are either aliphatic or aromatic in nature except that one or more hydrogen atoms have been replaced by a halogen atom (chlorine, fluorine or bromine).

B. Human Health Effects

1. Acute

a. Inhalation

Alkanes with fewer than five carbon atoms are flammable gases at room temperature. Methane, ethane, propane and butane are relatively pharmacologically inactive and are considered simple asphyxiants. They can indirectly produce toxic effects because they displace oxygen in the lungs.

Pentane and higher alkanes, as well as the aromatic hydrocarbons, are volatile, flammable liquids. They can all be classified as central nervous system depressants. Vapors of these hydrocarbons are irritating to the mucous membranes and prolonged or excessive exposure results in headache, dizziness, nausea, incoordination, tremors, coma and death. The higher molecular weight solvents generally have a lower vapor pressure and are less volatile. Therefore they are less likely to cause nervous system symptoms.

b. Ingestion

Accidental ingestion of hydrocarbons, although uncommon, is a significant concern. This is a particular problem with the lighter distillates, such as hexane, which have higher vapor pressure, lower surface tensions and higher volatility. Hydrocarbons may be aspirated during swallowing or vomiting. Relatively small amounts can spread quickly over the large moist surfaces of the lung resulting in pneumonitis, pulmonary edema, and

hemorrhage. The central nervous system, gastrointestinal tract, liver and heart may also be affected if very large quantities are ingested.

c. Skin

All of the liquid hydrocarbons dissolve lipids and will defat the skin, resulting in drying, irritation and dermatitis. Skin absorption may be a significant route of exposure for some hydrocarbons (particularly xylene and toluene). These solvents may act as carriers and transport through the skin toxic compounds which would not normally be absorbed by the skin.

d. Most hydrocarbons cause reversible irritation of the eyes.

2. Chronic

The aromatic and chlorinated hydrocarbons are associated with possible liver, kidney and nervous system damage including the brain.

C. Special Hazards

1. Carcinogenicity

Several epidemiological studies have shown an association of chronic benzene exposure and leukemia in humans. Benzene can be present as a low-level contaminant in other solvents or solvent blends. Many chlorinated hydrocarbons are suspect carcinogens as well.

2. Reproduction and Mutagenicity Effects

Toluene and xylene studies in animals have demonstrated reduced fetal weight, retarded development and skeletal anomalies. Limited human studies have indicated a relationship between exposure to toluene, xylene and benzene and menstrual disorders.

There is evidence that benzene can cause chromosomal damage in exposed workers (mutagenesis).

D. Specific Compound Effects

1. Hexane

Chronic exposure to normal hexane may produce nerve damage known as peripheral neuropathy or gamma neuropathy. Common symptoms are progressive weakness in the extremities, muscle atrophy, foot and wrist drop. A decrease in nerve conduction velocity may be demonstrated in clinical examination. Two of the metabolites of normal hexane (5-hydroxy-2-hexanone and 2,5-hexanedione) are felt to be the specific neurotoxic agents.

2. Benzene

Acute exposure to benzene results in the general symptoms of hydrocarbon intoxication (headache, dizziness, drowsiness). Chronic exposure can affect the bone marrow and blood cells causing anemia, decreased white blood cell numbers and aplastic or hyperplastic bone marrow.

Alcohols

A. General Information

Alcohols are hydrocarbons in which a hydroxyl group (-OH) is substituted for a hydrogen. They may be represented generically by the formula R-OH. The R group may be aliphatic or aromatic, saturated or unsaturated. The most familiar alcohols are the short chained ones methyl, ethyl, propyl, butyl and amyl alcohol.

B. Toxicology Information

Alcohols are water soluble and are therefore poorly eliminated from the lungs. Metabolism of inhaled or ingested alcohols usually proceeds through a sequential oxidation. First to aldehyde (e.g. acetaldehyde following ingestion of ethyl alcohol) and then to the acid (acetic acid) and/or the acetate which are then excreted by the kidneys. In general, the longer the carbon chain, the greater the molecular weight and the greater the toxicity. The exception is methyl alcohol that is more toxic than ethyl alcohol.

C. Human Health Effects

1. Acute

a. Inhalation

Symptoms of inhalation include upper respiratory tract irritation, tremors and headache. The toxicity of the short chain alcohols is variable, but they all produce some degree of central nervous system effects following inhalation.

The following table illustrates that as the length of the carbon chain decreases, the vapor pressure (and therefore the likelihood of inhalation) increases. However, as mentioned earlier, the toxicity generally decreases as the molecular weight decreases:

Alcohol	Vapor Pressure	Molecular Weight
Methyl	97	32.0
Ethyl	50	46.1
n-Propyl	15	60.1
n-Butyl	4	74.1
n-Amyl	1	88.1

The various branched-chain isomers of the last three alcohols generally have higher vapor pressures than the straight-chain isomers.

b. Skin

Due to their lipid (fat) solubility, many alcohols can be absorbed through the skin in significant amounts to produce systemic effects. The rate and amount absorbed will depend on the alcohol involved, the integrity of the skin and the length of time of contact. Skin contact may result in drying, irritation and dermatitis.

c. Ingestion

The systemic effects are associated with ingestion are discussed in section D below.

2. Chronic

Chronic health effects are rare in the industrial environment.

D. Special Hazards

1. Reproduction and Mutagenicity Effects

The effects of maternal ethanol ingestion on the fetus are well known. The pattern of abnormalities that results is called "fetal alcohol syndrome". Included in this are low birth weight, poor weight gain, facial abnormalities, heart defects and anomalies in the skeletal, central nervous and uro-genital systems.

Alcohols in general are not associated with adverse reproductive or mutagenicity effects.

E. Specific Chemical Exposure Guidelines

1. Methanol (Methyl Alcohol)

Accidental ingestion of methanol has serious toxicological implications. Initial symptoms of toxicity are similar to those of ethanol. Following a 3 to 36 hour latent period, there is an abrupt onset of nausea, vomiting, visual disturbances, dizziness, headache, delirium and abdominal pain.

The development of acidosis from the formation and accumulation of both formic and lactic acids may lead to severe metabolic disorders.

Ocular damage is a special concern with ingested methanol. Ingestion of as little as 4 ml has caused <u>blindness</u>. Visual disturbances may also result from chronic inhalation. Retinal destruction and optic nerve degeneration are caused primarily by formaldehyde accumulation and are enhanced by metabolic acidosis. Medical treatment involves administering sodium bicarbonate intravenously to reverse the acidosis and the oral or intravenous administration of ethanol. Ethanol has 10 to 20 times greater affinity for alcohol dehydrogenase (the primary metabolic enzyme) than methanol and thus reduces the rate of methanol metabolism to its toxic metabolites.

Skin absorption can contribute significantly to overall exposure.

2. Ethanol (Ethyl Alcohol)

Ethanol is routinely ingested in alcoholic beverages. It is rapidly absorbed from the gastrointestinal tract. The effects of ethanol ingestion are well known and initially include slowed reflexes, slurred speech and ataxia.

These symptoms may progress to vomiting and convulsions and in extreme cases coma and death. Ethanol is often "denatured" to render it unfit for human consumption. One common denaturing agent is methanol. Accidental ingestion of denatured ethanol that contains methanol should be treated as methanol ingestion.

3. Isopropanol (Isopropyl Alcohol)

Can cause eye, nose, throat irritation and narcosis. Although skin absorption is possible, this route of exposure is not expected to contribute significantly to systemic toxicity.

4. Butanol (n-Butyl Alcohol)

Skin absorption can contribute significantly to overall exposure.

Ketones

A. General Information

Ketones are aliphatic or aromatic organic compounds which contain the carbonyl group (C=O). They may be represented generically as R-(C=O)-R. The lower molecular weight ketones, such as acetone, are flammable liquids and are characterized by a sharp, sweet mint-like odor.

B. Human Health Effects

1. Acute

a. Inhalation

Ketones are central nervous system depressants. Symptoms of exposure to high concentrations include nausea, headache, dizziness and unconsciousness. Inhalation of vapors will cause irritation of the nose and throat at concentrations lower than those that produce a narcotic effect. Therefore, narcotic concentrations are not voluntarily inhaled.

b. Skin and Eyes

Skin contact is irritating and will cause drying and dermatitis. Ketone vapors are irritating to the eyes. Eye contact with the liquids will cause irritation and burning.

c. Ingestion

Ingestion of ketones may cause irritation of the gastrointestinal tract, narcosis, nausea and vomiting. Hyperglycemia and ketonemia that resemble an acute diabetic coma and renal tubular necrosis have been reported following ingestion of acetone.

2. Chronic

Repeated and prolonged skin exposure may result in dermatitis. Methyl isobutyl ketone may produce kidney damage.

C. Special Hazards

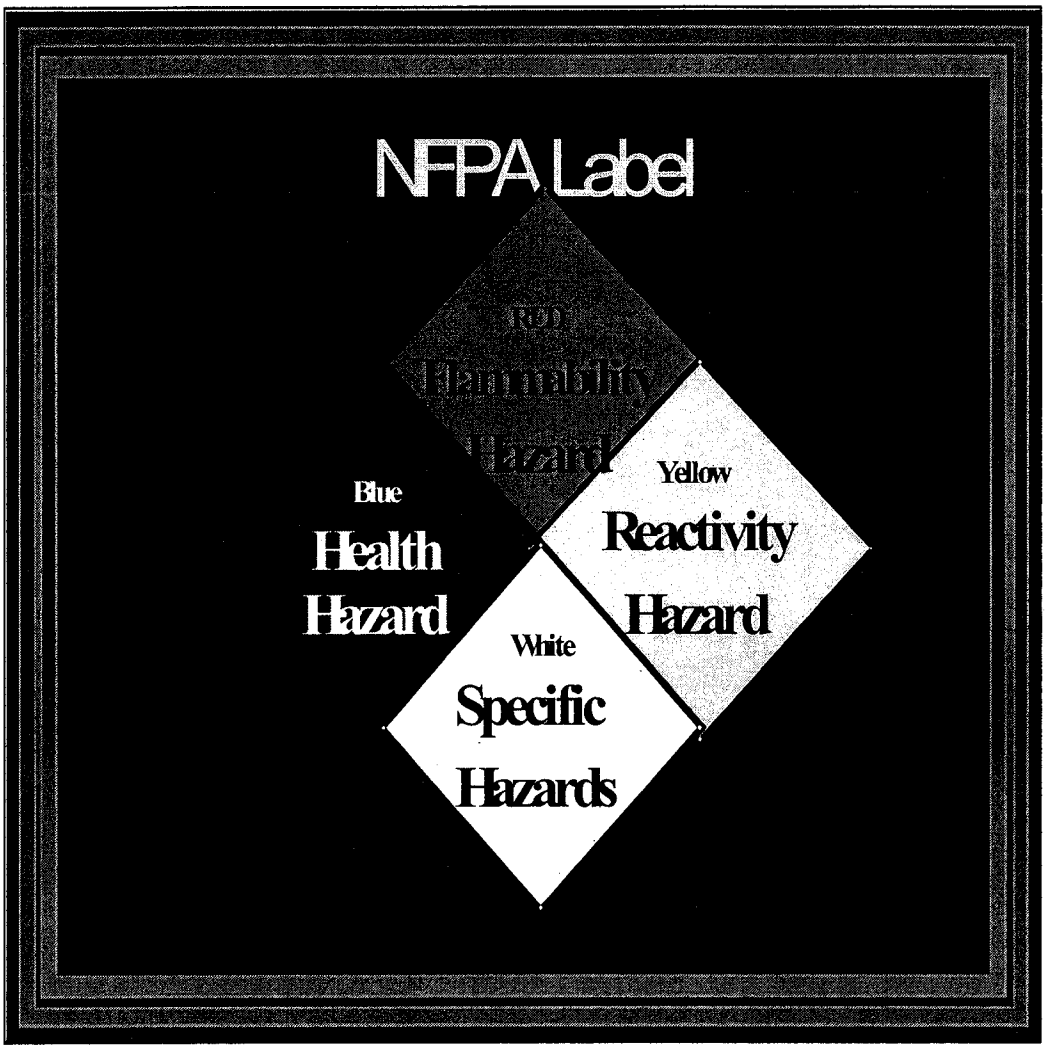
1. Reproduction, Teratology, Mutagenicity and Carcinogenic Effects: There are no reports of reproductive, teratogenic, mutagenic or carcinogenic defects in humans.

APPENDIX B

NATIONAL FIRE PROTECTION ASSOCIATION (NFPA) 704

IDENTIFICATION OF THE FIRE HAZARDS OF MATERIALS

NFPA 704 HAZARD IDENTIFICATION LABEL



APPENDIX C

UNDERSTANDING MATERIAL SAFETY DATA SHEETS

UNDERSTANDING AN MSDS

I. This section is designed to assist in the understanding of Material Safety Data Sheets and any potential safety or health hazards of materials to which employees may encounter on the job.

II. OSHA has not specified a format for MSDSs under the Hazard Communication Standard, but has developed a non-mandatory format, OSHA form 174. Regions may follow the OSHA format, or the recently adopted ANSI Z400.1 format, as supplied by the manufacturer.

III. Chemical manufacturers may use different formats for their MSDS, provided that they contain all the necessary information required by the OSHA Hazard Communication Standard.

IV. The following information details the sections of an MSDS, and gives a summary of the information found in the section.

A. **MSDS Section I - Manufacturer Information**

1. Section I is required by the OSHA Hazard Communication Standard to indicate the name, address and telephone number of the manufacturer providing the MSDS. A trade name or specific chemical name of the material represented is to be listed. This information (trade name) may be protected as a trademark.

2. In certain cases a Hazard Summary or a telephone number may be included to give access to potential physical and health hazards of the chemical(s) covered by the MSDS. This summary is not mandatory but is often included by the manufacturer.

B. **MSDS Section II - Ingredients**

1. Section II involves the listing of hazardous constituents and percentages (be weight) of those constituents. A manufacturer may decide to withhold an ingredient's name as a trade secret if it is hazardous, but in this situation the manufacturer <u>must</u> divulge the hazardous properties of the ingredient. The threshold limit value gives the airborne exposure limit for each ingredient.

C. **MSDS Section III - Physical Data**

1. Information included in Section III covers physical characteristics of the material. The following items are included in this section:

a. <u>Boiling Point</u> - The temperature in degrees Fahrenheit or centigrade where the liquid material changes to a vapor (generally at sea level). Flammable materials with low boiling points often present special fire hazards.

b. <u>Vapor Pressure</u> - The pressure of saturated vapor above a liquid surface.

c. Vapor Density - Indicates the density of a vapor or gas compared to air. Vapors/gases denser than air accumulate near the floor or other low areas. Those less dense accumulate in higher places such as ceilings.

d. Solubility in Water - The tendency of a material to blend uniformly with water. This figure is usually given as a percent soluble in water.

e. Specific Gravity - Relates how dense a material is when compared to water. information concerning specific gravity is expressed as a ratio to water. A ratio of less than one indicates the material will float on water. A material with a ratio greater than one would sink.

f. Percent Volatile by Volume - The percent of a liquid or solid that will pass into a vapor state at 68 degrees F (20 degrees C).

g. Appearance and Odor - Describes the physical appearance and odor of the material.

D. **MSDS Section IV - Fire and Explosion Hazards**

1. Items involved in this section include the flash point of the material and the testing method used. The referenced material's auto ignition temperature (lowest temperature at which the material will ignite from a heat source without spark or flame) is also included. Lower Explosion Limits (LEL) and Upper Explosion Limits (UEL) are included along with the proper extinguishing media and unusual hazards concerning fire or explosion.

E. **MSDS Section V - Human Health Hazard Assessment**

1. Information in this section details potential health hazards due to exposure/overexposure. Threshold limit values (TLV) are given along with effects of overexposure, symptoms, and emergency and first aid procedures. Exposure to potentially hazardous chemicals does not necessarily result in adverse health. Employees are insured of safe working conditions by controlling the exposure level.

F. **MSDS Section VI - Reactivity Data**

1. Section VI describes the general reactivity of the material. Covered are the topics of stability and conditions to avoid to prevent reaction, incompatibilities, hazardous decomposition products produced by burning oxidation, heating or reactions with other chemicals, polymerization and conditions to avoid to prevent polymerization.

G. **MSDS Section VII - Spill or Leak Procedures**

1. Information relating to spill or release situations are detailed in this section. Methods for control and cleanup materials, protective procedures, recommended disposal methods and possible means of handling containers are listed.

2. This section also alerts the reader as to whether or not the environment (water, crops, vegetation, animals and people) may be endangered by leakage.

H. **MSDS Section VIII - Special Protection Information**

1. Suggested exposure limits are indicated in this section by the use of Threshold Limit Values (TLVs) and Permissible Exposure Limits (PELs). Also included is required personal protective equipment, conditions under which it should be used, and exhaust ventilation requirements.

I. **MSDS Section IX - Special Precautions and Comments**

1. This section describes any special conditions or precautions to be considered during handling or storage of the material. Specific tests to be performed may be included.

J. **MSDS Section X – First Aid / Emergency Response**

1. This section describes measures to be taken in case of exposure.

K. MSDS Section XI – Toxicology Information

1. This section includes information on carcinogen listings, including OSHA, National Toxicology Program and International Agency for Research on Cancer.

L. **MSDS Section XII – Date**

1. Include on every MSDS, the date of its preparation or update.

APPENDIX D

HAZARD DEFINITIONS

HAZARD DEFINITIONS

I. The following list presents several useful definitions of chemical hazard terminology.

II. Physical hazards include chemicals that are combustible liquids, compressed gases, explosive flammable, organic peroxides, oxidizers, pyrophorics, unstable (reactive), or water reactive.

III. Health hazards include chemicals that are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatoxins, enphrotoxins, neurotoxins, agents which act on the hematopoietic system, and agents that damage the lungs, skin, eyes or mucous membranes.

IV. For hazard assessment purposes, OSHA uses the following definitions:

Corrosive: A chemical that causes visible destruction of, or irreversible alterations in living tissue by chemical action at the site of contact in animal testing.

Highly Toxic: A chemical falling within any of the following categories:

- A chemical that has a median lethal dose (LD50) of 50 milligrams or less per kilogram of body weight when administered orally to albino rats weighing between 200 and 300 grams each.
- A chemical that has a median lethal dose (LD50) of 200 milligrams or less per kilogram of body weight when administered by continuous contact for 24 hours with the bare skin of albino rabbits weighing between two and three kilograms each.
- A chemical that has a median lethal concentration (LC50) in air of 200 parts per million by volume or less of gas or vapor, or 2 milligrams per liter or less of mist, fume or dust when administered by continuous inhalation for one hour to albino rats weighing between 200 and 300 grams each.

Irritant: A chemical which is not corrosive, but which causes a reversible inflammatory effect on living tissue by a chemical action at the site of contact when tested on the intact skin of albino rabbits.

Sensitizer: A chemical that causes a substantial proportion of exposed people or animals to develop an allergic reaction in normal tissue after repeated exposure to the chemical.

Toxic: A chemical falling within any of the following categories:

- A chemical that has a median lethal dose (LD50) of more than 50 mg per kg but not more than 500 mg per kilogram of body weight administered orally to albino rats weighing 200 and 300 grams each.
- A chemical that has a median lethal dose (LD50) of more

than 200 mg per kg but not more than 1,000 milligrams per kilogram of body weight when administered by continuous contact for 24 hours with the bare skin of albino rabbits weighing between two and three kilograms each.

- A chemical that has median lethal concentration (LC50) in air of more than 200 parts per million but not more than 2,000 parts per million by volume of gas or vapor, or more than two milligrams per liter but not more than 20 milligrams per liter of mist, fume, or dust, when administered by continuous inhalation for one hour to albino rats weighing between 200 and 300 grams each.

Acute: Effects occur rapidly as a result of short-term exposures, and are of short duration.

Chronic: Effects generally occur as a result of long-term exposure, and are of long duration.

Poison: Any normal contact amount will cause harm to body, including death. Example: Hydrogen cyanide.

Toxicity: The damage that is received at a given exposure level.

Local Effects: Damage that occurs at site of contact.

Systemic Effects: Damage that occurs at location or site other than site of contact.

Teratogen: Substances that cause malformations or serious deviations in animal embryos or fetuses, which cannot be inherited.

Mutagen: Any substance that causes changes in genetic structure in subsequent generations.

Asphyxiants: An asphyxiant gas has little or no positive toxic effect, but can bring about unconsciousness and death by replacing air or displacing oxygen and thus deprive an organism of oxygen. Examples: Carbon Dioxide, Nitrogen, Helium, Methane, etc.

Combustible Liquid: Any liquid having a flash point at or above 100 degrees F (37.8 degrees C), but below 200 degrees F (93.3 degrees C).

Compressed Gas: Compressed gases are categorized as follows:

1. A gas or mixture of gases having, in a container, an absolute pressure exceeding 40 p.s.i. at 69.98 degrees F (21.1 degrees C) or,

2. A gas or mixture of gases having, in a container, an absolute pressure exceeding 140 p.s.i. at 130 degrees F (54.4 degrees C) or,

3. A liquid having a vapor pressure exceeding 40 p.s.i. at 100 degrees F (37.8 degrees C).

Explosive: A chemical that causes sudden, almost instantaneous release of

pressure, gas and heat when subjected to sudden shock, pressure, or high temperature.

Flammable Gas: A gas that at ambient temperature and pressure forms a flammable mixture with air at a concentration of 13% by volume or less; or forms a range of flammable mixtures with air wider than 12% by volume, regardless of the lower limit.

Flammable Solid: A solid, other than a blasting agent or explosive, that is liable to cause fire through friction, absorption of moisture, spontaneous chemical change, or retained heat from manufacturing or processing, or which can be ignited readily and when ignited burns so vigorously and persistently as to create a serious hazard.

Oxidizer: A chemical other than a blasting agent or explosive that initiates or promotes combustion in other materials, thereby causing fire either of itself or through the release of oxygen or other gases.

Pyrophoric: A chemical that will ignite spontaneously in air at a temperature of 130 degrees F (54.4 degrees C) or below.

Carcinogen: A chemical is considered to be a carcinogen if:

1. It has been evaluated by the International Agency for Research on Cancer (IARC), "Monographs" (latest edition) and found to be a carcinogen or potential carcinogen; or

2. It is listed as a carcinogen or potential carcinogen in the Annual Report on Carcinogens published by the National Toxicology Program (NTP) (latest edition); or

3. It is regulated by OSHA as a carcinogen.

Target Organ Effects: The following is a target organ categorization of effects which may occur, including examples of signs and symptoms and chemicals which have been found to cause such effects. These examples are presented to illustrate the range and diversity of effects and hazards found in the work place, and the broad scope employers must consider in this area, but are not intended to be all-inclusive.

1. Hepatotoxin: chemicals which produce liver damage Signs and Symptoms: Jaundice; liver enlargement Chemicals: Carbon tetrachloride; nitrosamines

2. Nephrotoxins: Chemicals which produce kidney damage Signs and Symptoms: Edema*: proteinuria** Chemicals: Mercury; carbon disulfide

3. Agents which act on the blood or hematopoietic system: Decrease hemoglobin function; deprive the body tissues of oxygen Signs and Symptoms: Cyanosis; loss of consciousness Chemicals: Carbon monoxide; cyanides

4. Agents which damage the lung; chemicals which irritate or damage the pulmonary tissue
   Signs and Symptoms: Cough; tightness in chest;

shortness of breath
Chemicals: Silica; asbestos

5. Reproductive toxins: Chemicals that affect the reproductive capabilities including chromosomal damage (mutations) and effects on fetuses (teratogenesis)
   Signs and Symptoms: Birth defects; sterility
   Chemicals: Lead; DBCP

6. Cutaneous hazards: Chemicals that affect the dermal layer of the body
   Signs and Symptoms: Defatting of the skin; rashes; irritation
   Chemicals: Ketones; chlorinated compounds

7. Eye hazards: Chemicals that affect the eye or visual capacity
   Signs and Symptoms: Conjunctivitis; corneal damage
   Chemicals: Organic solvents; acids

*Edema is an abnormal accumulation of fluid in the tissues of the body.
**Proteinuria is excess protein in urine.

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: AZ0000337360
2. Page 1 of 1
3. Emergency Response Phone: 1-800-535-5053
4. Manifest Tracking Number: 000461498 VES

5. Generator's Name and Mailing Address
Veolia ES Technical Solutions L.L.C.
5730 W. Jefferson St
Phoenix, AZ 85043
Generator's Phone: 602-233-2956

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: Veolia ES Technical Solutions L.L.C.
U.S. EPA ID Number: NJD080631389

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
U.S. Ecology
Hwy 95, 12 Miles South of Beatty
Beatty, NV 89003
Facility's Phone: 775-553-2203
U.S. EPA ID Number: NVT330010000

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. RQ, Polychlorinated Biphenyls, Solid, 9, UN3432, PGIII (Dirt & Debris/Transformers & Bushings)	02	CM	10370	K	D019	D001	
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
DOL# D663409-1 DOL# D660668-1 PO.# 5010033709 9/15-10
All Transformers & Bushings Drained, Flushed & Rinsed >500ppm
Profile #07009270S
DOT ERG #171
Direct Landfill
Out-of-Service Date
Certificate of Burial Required

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Mike Bonnell
Signature
Month 10 Day 07 Year 10

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Kirk P. Robichaux
Signature
Month 10 Day 07 Year 10
Transporter 2 Printed/Typed Name
Signature
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name
Signature
Month Day Year

GENERATOR | INT'L | TRANSPORTER | DESIGNATED FACILITY

Container Number:

Profile:

Generator:

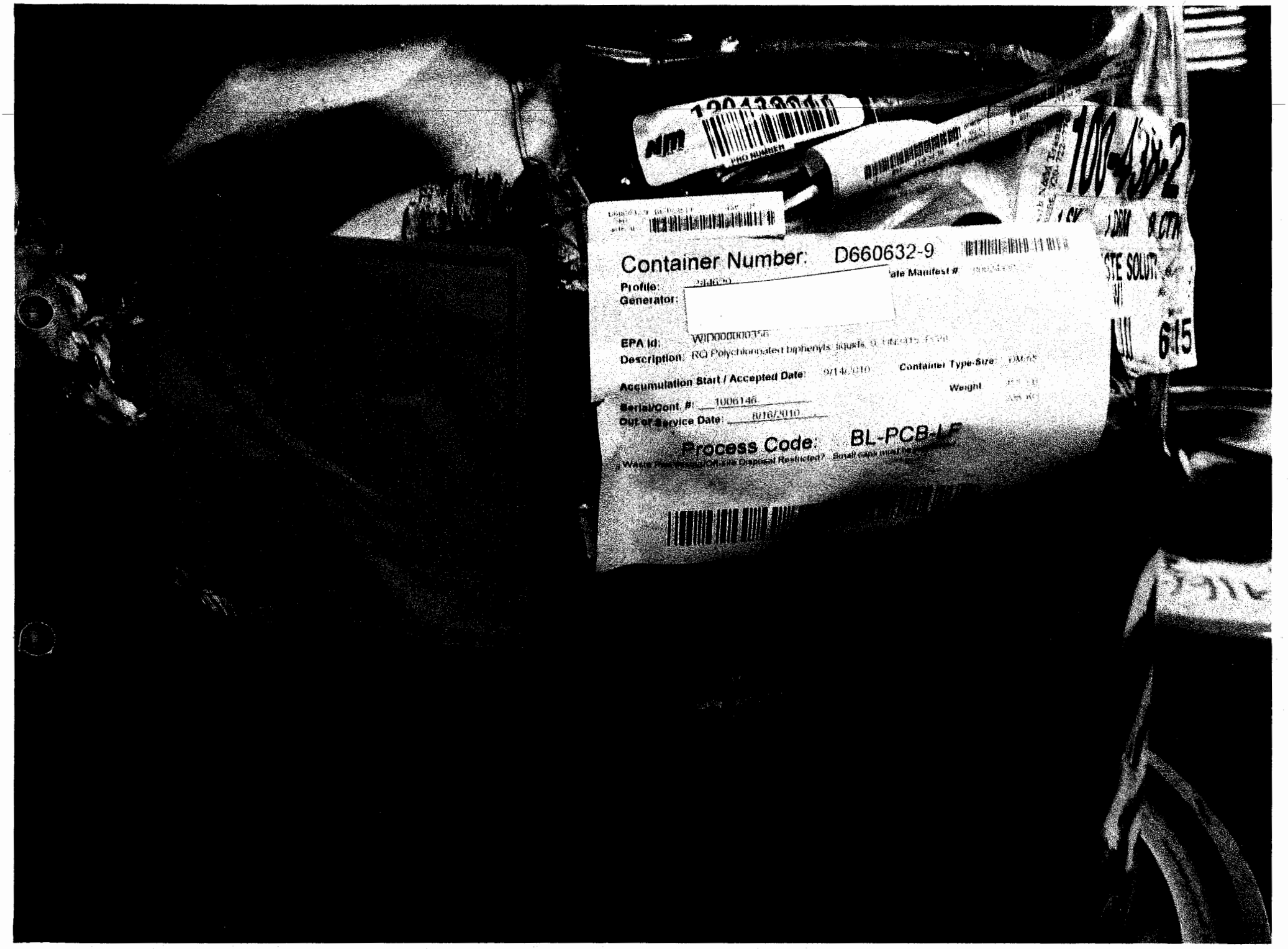
EPA ID:

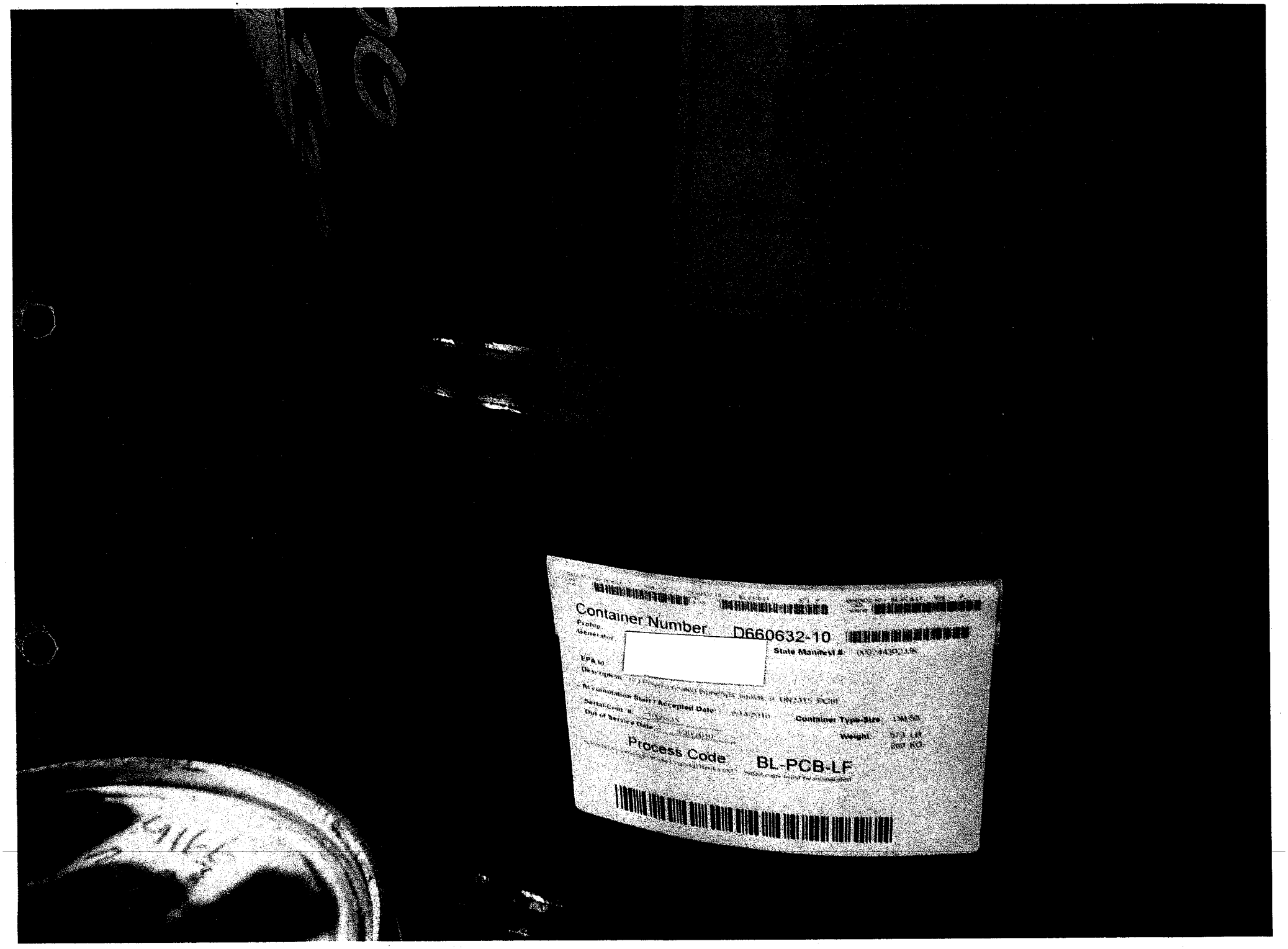
Accumulation Start / Accepted Date:

Shipping Date:

Out of Service Date:

Process Code: BL-PCB-LF


Container Number: D660632-9
Profile:
Generator:
EPA Id:
Description: RQ Polychlorinated biphenyls, liquids
Accumulation Start / Accepted Date:
Container Type-Size:
Weight
Serial/Cont. #: 1006146
Out of Service Date: 8/16/2010
Process Code: BL-PCB-LF
615


Container Number
D660632-10
Process Code
BL-PCB-LF

VEOLIA
ENVIRONMENTAL SERVICES

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.
PHOENIX FACILITY
INSPECTION

1.0 PURPOSE:

The purpose of this document is to provide a summary of the analytical results for the floor wipe samples collected by Veolia ES Technical Solutions, L.L.C. (Veolia), and documentation of corrective actions implemented.

2.0 HISTORY:

An inspection was conducted at Veolia on March 17, 2008 by members of the USEPA to determine compliance with certain aspects of Veolia's activities regarding the storage and management of PCB containing materials. As a part of the inspection USEPA collected floor wipe samples from various locations within Buildings 2, 3, and 4 of the facility. Veolia, in turn, collected side-by-side floor wipe samples of the areas immediately adjacent to those collected by USEPA. Veolia floor wipe samples were sent to a laboratory on March 18, 2008 and results were obtained on March 25, 2008. These wipe sample results exhibited varying levels of PCB's as exhibited in Table 1, Column 2. The results indicate the presence of PCB's in excess of 10 ug/100 cm2 on floor surfaces outside the secondary containment.

Upon obtaining the floor wipe sample results from the laboratory, Veolia implemented immediate corrective action. The corrective action included cleaning and decontaminating all affected areas following the procedures outlined in 40 CFR 761 Subpart S. The first wash consisted of covering the entire surface with concentrated industrial strength detergent. All affected surfaces were thoroughly scrubbed with an appropriate scrub brush while continually adding cleaning solution so that the surface was always wet. The cleaned surfaces were then wiped with a cleaning solution-soaked disposable absorbent pad. The purpose of performing the initial clean was to remove any residual dirt, dust, grime, or other materials adhering to the surface. All collected rinsates and absorbent pads were managed as PCB contaminated wastes. After the initial cleaning, Veolia initiated a double final clean of the affected areas using a blended PCB decontamination solvent. Sufficient solvent was used to cover the affected areas completely during each cleaning event. Similar to the initial cleaning described above all affected surfaces were thoroughly scrubbed with an appropriate scrub brush while continually adding the cleaning solvent so that the surfaces were continually wet. The final cleaned surfaces were then wiped with a cleaning solution-soaked disposable absorbent pad. Again, all collected rinsates and absorbent pads were managed as PCB contaminated waste.

After the affected areas were cleaned as outlined above, floor wipe samples were obtained again in the same sample locations in order to gauge the effectiveness of the above described cleaning methodology. As depicted in Table 1, Column 3 all of the affected post cleaning floor wipe sample results were less than 10 ug/100 cm2.

3.0 CONCLUSION:

Based on the results of the wipe testing conducted following the cleaning and decontamination of the floor, Veolia believes that the corrective actions immediately implemented have adequately addressed the condition of the facility. Furthermore, Veolia firmly believes that implementation of the above proposal will significantly reduce the potential for PCBs to be present in areas of the facility outside the secondary containment areas designated for PCB storage and processing.

As such, Veolia is requesting authorization proceed with the implementation of the proposed facility modifications. Upon receiving approval to implement these modifications, Veolia will develop detailed specifications for the modifications and submit them as a modification to the plan of operations submitted for renewal of the facility's approval to operate as a commercial storage facility.

Table 1

BLDG #/Sample Location	Results Prior To Cleaning- ug/100 cm2		Results After Cleaning- ug/100 cm2
BLDG 2-1	186		2
BLDG 2-2	209		2
BLDG 2-3	42		6
BLDG 3-1	11		1
BLDG 3-2	9		1
BLDG 3-3	15		4
BLDG 4-1	19		8
BLDG 4-2	6		2
BLDG 4-3	6		3

VEOLIA
ENVIRONMENTAL SERVICES

ATTACHMENT VI

A. Manifest 000060683 VES: With Generic EPA ID Number (40 CFR PART 761)
B. Eight Veolia PCB Manifests with Removal from Service Violations.

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

March 17, 2008 and
September 16, 2010

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: 40 CFR 761
2. Page 1 of: 1
3. Emergency Response Phone: 800-535-5053
4. Manifest Tracking Number: 000060683 VES

5. Generator's Name and Mailing Address: VEOLIA ES Technical Solutions, I-17 SB MM 229, PHOENIX, AZ 85043
Generator's Site Address (if different than mailing address): 5736 WEST Jefferson, PHOENIX, AZ 85043
Generator's Phone: 602-725-7726

6. Transporter 1 Company Name: VEOLIA ES TECHNICAL Solutions LLC.
U.S. EPA ID Number: NJD080631369

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address: VEOLIA ES Technical Solutions LLC, 5736 W. Jefferson St, PHOENIX AZ 85043
U.S. EPA ID Number: AZ0000337360
Facility's Phone:

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. Waste Polychlorinated Biphenyls, Solid 9, UN3432, PG III	002	DM	100	K			
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
1) Clean up material FM I-17 spill (ABSORBENT, wipe pads, shovels, Brooms)

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: GREG S. NEWTON
Signature: [signature]
Month 02 Day 06 Year 07

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Rick Warren
Signature: [signature]
Month 02 Day 06 Year 07
Transporter 2 Printed/Typed Name:
Signature:
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H141 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Angel X Murillo
Signature: [signature]
Month 02 Day 07 Year 07

GENERATOR | INT'L | TRANSPORTER | DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY'S COPY

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WID988566543
2. Page 1 of 1
3. Emergency Response Phone: 800 535-5053
4. Manifest Tracking Number: 000039864 VES

5. Generator's Name and Mailing Address
Veolia ES Technical Solutions, LLC
1275 Mineral Springs Dr.
Port Washington, WI 53074
Generator's Site Address (if different than mailing address)
Generator's Phone:

6. Transporter 1 Company Name: Veolia ES Technical Solutions, LLC
U.S. EPA ID Number: NJD080631369

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Veolia ES Technical Solutions, LLC
5736 West Jefferson
Phoenix, AZ 85043
Facility's Phone:
U.S. EPA ID Number: AZ0000337360

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. RQ Polychlorinated Biphenyls, Liquid, 9, UN2315, PGIII (Liquid in Solid Capacitor Case)	008	DM	2258	K	PCB1
	2. RQ Polychlorinated Biphenyls, Liquid, 9, UN2315, PGIII (Liquid in Solid Capacitor Case)	001	DF	073	K	PCB1
	3. Non-Regulated Special Waste (Non PCB Capacitor)	001	DM	220	P	NONE
	4. Non Regulated Special Waste (Non PCB oil)	001	DM	055	G	NONE

14. Special Handling Instructions and Additional Information
1. PCB Ballasts (9686) 2. PCB Ballasts (4680) 3. Non PCB Capacitor (154428) 4. Non PCB oil
EMERGENCY CONTACT#800-535-5053 S.O.# 318977

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: David Braun
Signature: David Braun
Month Day Year: 12 27 06

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: PIERRE MARCH
Signature:
Month Day Year: 12 27 06
Transporter 2 Printed/Typed Name:
Signature:
Month Day Year:

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Line 4) Received a Non PCB Transformer (oil-filled) in 85 gal DM gross wgt 583P. Received per Dib F012 on 1/15/07
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H141 2. H141 3. H141 4. H141

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Angel X Murillo
Signature: Angel X Murillo
Month Day Year: 01 12 07

GENERATOR | INT'L | TRANSPORTER | DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY'S COPY

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WID988566543
2. Page 1 of: 1
3. Emergency Response Phone: 800 535-5053
4. Manifest Tracking Number: 000039860 VES

5. Generator's Name and Mailing Address
Veolia ES Technical Solutions, LLC
1275 Mineral Springs Dr.
Kenosha, WI 53074
Generator's Phone:
Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: Veolia ES Technical Solutions, LLC
U.S. EPA ID Number: NJD080631369

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Veolia ES Technical Solutions, LLC
5736 West Jefferson
Phoenix, AZ 85043 602-233-2955
Facility's Phone:
U.S. EPA ID Number: AZ0000337360

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. RQ Polychlorinated Biphenyls, Liquid, 9, UN2315, PGIII (Liquid in Solid Capacitor Case)	8	DF	2006	K	PCB1
	2. RQ Polychlorinated Biphenyls, Liquid, 9, UN2315, PGIII (Liquid in Solid Capacitor Case)	11	DM	1376	K	PCB1
	3. Non-Regulated Equipment For Recycling	1	DM	704	P	NONE
	4. Non-Regulated Equipment For Recycling	2	CW	875	P	NONE

14. Special Handling Instructions and Additional Information
a. PCB Ballasts (9686) 2. PCB Ballasts (9686) 3. Non-PCB Ballasts (149311)
4. Non-PCB Transformers (174049)
EMERGENCY CONTACT#800-535-5053 S.O.# 321816

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Debbie Folz Signature: Debbie Folz Month Day Year: 01 11 07

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: John Decker Signature: Month Day Year: 01 17 07
Transporter 2 Printed/Typed Name: Signature: Month Day Year:

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H141 2. H141 3. H141 4. H141

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Angel X Murillo Signature: Angel X Murillo Month Day Year: 01 23 07

GENERATOR / INT'L / TRANSPORTER / DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. **DESIGNATED FACILITY'S COPY**

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WID988566543
2. Page 1 of: 1
3. Emergency Response Phone: 800 535-5053
4. Manifest Tracking Number: 000039946 VES

5. Generator's Name and Mailing Address
Veolia ES Technical Solutions, LLC
1275 Mineral Springs Dr.
Port Washington, WI 53074 262-243-8900
Generator's Phone:

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: Veolia ES Technical Solutions, LLC
U.S. EPA ID Number: NJD080631369

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
Veolia ES Technical Solutions, LLC
5736 West Jefferson
Phoenix, AZ 85043
Facility's Phone:
U.S. EPA ID Number: AZ0000337360

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
	1. RQ Polychlorinated Biphenyls, Liquid, 9, UN2315, PGIII (Liquid in Solid Capacitor Case)	16	CF	13563	K	PCB1		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
1. PCB Ballasts (9686)

EMERGENCY CONTACT#800-535-5053 S.O.# 313326

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Debbie Folz
Signature: Debbie Folz
Month Day Year: 01 26 07

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: John Decker
Signature:
Month Day Year: 01 26 07
Transporter 2 Printed/Typed Name
Signature
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H141 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Angel X Murillo
Signature: Angel X Murillo
Month Day Year: 02 05 07

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WID988566543
2. Page 1 of: 1
3. Emergency Response Phone: 800 535-5053
4. Manifest Tracking Number: 000039910 VES

5. Generator's Name and Mailing Address
Veolia ES Technical Solutions, LLC
1275 Mineral Springs Dr.
Washington, WI 53074 262-243-8900
Generator's Site Address (if different than mailing address)
Generator's Phone:

6. Transporter 1 Company Name: Haz-Mat Environmental Group
U.S. EPA ID Number: NYD980769947

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
Veolia ES Technical Solutions, LLC
5736 West Jefferson
Phoenix, AZ 85043 602-233-2955
Facility's Phone:
U.S. EPA ID Number: AZ0000337360

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
	1. RQ Polychlorinated Biphenyls, Liquid, 9, UN2315, PGIII (Liquid in Solid Capacitor Case)	1	DM	194	K	PCB1		
	2. RQ Polychlorinated Biphenyls, Liquid, 9, UN2315, PGIII (Liquid in Solid Capacitor Case)	9	DM	2354	K	PCB1		
	3. Non-Regulated Equipment For Recycling	3	CW	4399	P	NONE		
	4. Non-Regulated Equipment For Recycling	2	DF	478	P	NONE		

14. Special Handling Instructions and Additional Information
1. PCB Caps (9687) 2. PCB Ballasts (9686) 3. Non-PCB Caps (154928) 4. Non-PCB Caps (154928
OSP-212310?
EMERGENCY CONTACT/800-535-5053 S.O.# 326951

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Debbie Folz
Signature: Debbie Folz
Month Day Year: 02 23 07

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: William Lancaster
Signature: William R Lancaster
Month Day Year: 02 23 07
Transporter 2 Printed/Typed Name
Signature
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H141	H141	H141	H141

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name
Signature
Month Day Year

GENERATOR
INT'L
TRANSPORTER
DESIGNATED FACILITY

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UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WID988566543
2. Page 1 of: 1
3. Emergency Response Phone: 800 535-5053
4. Manifest Tracking Number: 000039911 VES

5. Generator's Name and Mailing Address
Veolia ES Technical Solutions, LLC
1275 Mineral Springs Dr.
Port Washington, WI 53074 262-243-8900
Generator's Phone:

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: Veolia ES Technical Solutions, LLC
U.S. EPA ID Number: NJD080631369

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Veolia ES Technical Solutions, LLC
5736 West Jefferson
Phoenix, AZ 85043 602-233-2955
Facility's Phone:
U.S. EPA ID Number: AZ0000337360

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. RQ Polychlorinated Biphenyls, Liquid, 9, UN2315, PGIII (Liquid in Solid Capacitor Case)	14	DM	3337	K	PCB1
	2. Non-Regulated Equipment For Recycling	4	DM	2027	P	NONE
	3. Non-Regulated Equipment For Recycling	1	DF	586	P	NONE
	4. Non-Regulated Equipment For Recycling	2	DM	890	P	NONE

14. Special Handling Instructions and Additional Information
1. PCB Ballasts (9686) 2. Non-PCB Ballasts (149311) 3. Non-PCB Ballasts (149311)
4. Non-PCB Caps (154926)
EMERGENCY CONTACT#800-535-5053 S.O.# 326455

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Debbie Folz
Signature: Debbie Folz
Month Day Year: 02 20 07

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S.
Port of entry/exit:
Transporter signature (for exports only):
Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Ralph Espositto
Signature:
Month Day Year: 2 20 07
Transporter 2 Printed/Typed Name:
Signature:
Month Day Year:

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H141 2. H141 3. H141 4. H141

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name:
Signature:
Month Day Year: 02 27 07

GENERATOR
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TRANSPORTER
DESIGNATED FACILITY

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Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WID988566543
2. Page 1 of 1
3. Emergency Response Phone: 800 535-5053
4. Manifest Tracking Number: 000039944 VES

5. Generator's Name and Mailing Address
Veolia ES Technical Solutions, LLC
1275 Mineral Springs Dr.
Port Washington, WI 53074 262-243-8900
Generator's Phone:

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: Veolia ES Technical Solutions, LLC
U.S. EPA ID Number: NJD080631369

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Veolia ES Technical Solutions, LLC
5736 West Jefferson
Phoenix, AZ 85043 602-233-2955
Facility's Phone:
U.S. EPA ID Number: AZ0000337360

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
	1. RQ Polychlorinated Biphenyls, Liquid, 9, UN2315, PGIII (Liquid in Solid Capacitor Case)	16	CF	13367	K	PCB1		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
1. PCB Ballasts (9686) OSD 2/9/07
EMERGENCY CONTACT#800-535-5053 S.O.# 325266

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Debbie Folz
Signature: Debbie Folz
Month Day Year: 02 09 07

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: SHANNON WILLIS
Signature:
Month Day Year: 02 9 07
Transporter 2 Printed/Typed Name:
Signature:
Month Day Year:

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H141 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Angel X Murillo
Signature: Angel X Murillo
Month Day Year: 03 01 07

GENERATOR
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DESIGNATED FACILITY'S COPY

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Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: W I D 9 8 8 5 6 6 5 4 3
2. Page 1 of: 1
3. Emergency Response Phone: 800 535-5053
4. Manifest Tracking Number: 000039912 VES

5. Generator's Name and Mailing Address
Veolia ES Technical Solutions, LLC
1275 Mineral Springs Dr.
Port Washington, WI 53074 262-243-8900
Generator's Phone:

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: Veolia ES Technical Solutions, LLC
U.S. EPA ID Number: N J D 0 8 0 6 3 1 3 6 9

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
Veolia ES Technical Solutions, LLC
5736 West Jefferson
Phoenix, AZ 85043 602-233-2955
Facility's Phone:
U.S. EPA ID Number: A Z 0 0 0 0 3 3 7 3 6 0

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. RQ Waste Ferric Chloride, ~~XXX~~ Anhydrous, Mixture, 8, UN1773, ~~XXXX~~ PGIII (D009)	9	DF	1912	P	D009
	2. RQ Polychlorinated Biphenyls, Liquid, 9, UN2315, PGIII (Liquid in Solid Capacitor Case)	13	DM	3694	K	PCB1
	3. Non-Regulated Equipment For Recycling	1	DF	354	P	NONE
	4. Non-Regulated Equipment For Recycling	2	DM	901	P	NONE

14. Special Handling Instructions and Additional Information
a. Monkey Dust RQ-1 ERG# 157 (326085) 2. PCB Ballasts (9686) 3. Non-PCB Caps (154928)
4. Non-PCB Caps (154928)
EMERGENCY CONTACT#800-535-5053 S.O.# 326871 OSD - 2/22/07

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Debbie Folz
Signature: Debbie Folz
Month Day Year: 02 22 07

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: John Decker
Signature:
Month Day Year: 03 01 07
Transporter 2 Printed/Typed Name
Signature
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H010	H141	H141	H141

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Angel X Murillo
Signature: Angel X Murillo
Month Day Year: 03 09 07

GENERATOR
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DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

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UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: NJD980536593
2. Page 1 of 1
3. Emergency Response Phone: (800) 535-5053
4. Manifest Tracking Number: 000018961 VES

5. Generator's Name and Mailing Address: VEOLIA ES TECHNICAL SOLUTIONS, 1 EDEN LANE, FLANDERS, NJ 07836
Generator's Site Address (if different than mailing address)
Generator's Phone: (973) 347-7111

6. Transporter 1 Company Name: FREEHOLD CARTAGE INC — U.S. EPA ID Number: NJD054126164

7. Transporter 2 Company Name: Veolia ES Technical Solutions — U.S. EPA ID Number: NJD080631369

8. Designated Facility Name and Site Address: VEOLIA ES TECHNICAL SOLUTIONS, 5736 WEST JEFFERSON STREET, PHOENIX, AZ 85043 — U.S. EPA ID Number: AZ0000337360
Facility's Phone: (602) 233-2955

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. WASTE POLYCHLORINATED BIPHENYLS, LIQUID MIXTURE, 9, UN2315, III	3	DF	~~165~~ 91	K	PCB1		
X	2. RQ WASTE POLYCHLORINATED BIPHENYLS, SOLID, 9, UN3432, III	2	DM	~~371~~ 449	K	B006	T	PCB1
	3.							
	4.							

14. Special Handling Instructions and Additional Information
1) SLN320005 2) SUPERIOR231102
*LINE 1 OUT OF SERVICE DATE 9/1/06*LINE 2 CONTAINER #N1-0747154001-002 OUT OF SERVICE DATE 9/28/06*CONTAINER #N1-0747154001-003 OUT OF SERVICE DATE 10/4/06*
SO # 318992

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: MARIANNA GALBIERCZYK — Signature: [signature] — Month 12 Day 15 Year 06

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: John Elimon — Signature: [signature] — Month 12 Day 15 Year 06
Transporter 2 Printed/Typed Name: David Braun — Signature: [signature] — Month 12 Day 18 Year 06

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H141 2. H141 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: MARTY C COLOSIMO — Signature: [signature] — Month 01 Day 05 Year 07

GENERATOR — TRANSPORTER — DESIGNATED FACILITY

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