Hong Sima, Ph.D., P.E.

275 Barnhill Road, Perkasie, PA 18944, USA 215-589-3720 hong.sima@yahoo.com

August 21, 2018

Denise Harrington Grattan
New York State Department of Environmental Conservation (NYSDEC)
1 Hunters Point Plaza
47-40 21st Street – 4th Floor
Long Island City, NY 11101
Telephone: (718)482-4062

Re: Sharps Permit Application ID: 2-6105-00889-00001

Dear Ms. Grattan,

This is to address the NYSDEC comments in your NOIA Application ID: 2-6105-00889/00001 dated August 16, 2018, in accordance with our phone conversations on August 3, 6 and 16, 2018. Thank you very much for your clarifications and discussions.

I have reviewed, signed and stamped the attached Addendum of Destination Facility Information (Appendix I of the Engineering Report), deemed acceptable to meet the requirements of 6 NYCRR Parts 360 and 365.

I have also discussed your comments regarding the permit application form with Mr. Curtis Knisley of Sharps Compliance, Inc. (Sharps). The attached form (Appendix E of the Engineering Report) has been revised and signed by Mr. David Tusa, the CEO and President of the firm, as an addendum to the Engineering Report.

In addition, during a final QA/QC review, there were several typos and an omission noticed. These have been corrected in the Facility Environmental Assessment Report (Appendix F of the Engineering Report). The revised EAR is attached as an addendum to the Engineering Report, and a list of the changes/corrections can be found on the second page of this cover letter.

Please feel free to contact Mr. Knisley (713-443-3539) and/or me (215-589-3720) if you have any questions or need additional information/discussions regarding this matter. Thanks for your time and attention.

Sincerely,

Hong Sima, PhD, PE (NYS License #082602-1)

Cc: Curtis Knisley, Sharps

Hong Sima, Ph.D., P.E.
275 Barnhill Road, Perkasie, PA 18944, USA 215-589-3720 hong.sima@yahoo.com

List of Changes/Corrections in the Facility Environmental Assessment Report (Appendix F of the Engineering Report):

Section I.B. Government Approvals
Subsection g. state agencies (p. 2):

- *Text to be corrected: "NYS Department of Environmental Conversation and Type of Permit"*
- ***Correct Text: "NYS Department of Environmental Conservation, RMW Transfer Station permit"***

Section E.1. Land uses on and surrounding the project site
Subsection d. Facilities serving children, the elderly or the disabled within 1500 feet (p. 10):

- *Checked http://maps.nyc.gov/doitt/nycitymap/ for any relevant facilities of concern within a radius of 1,500 feet, and change "No" to "**Yes**" on check boxes*
- ***Insert "Public School 202 and Friends of Crown Heights 17"***

Subsection h. contamination history (p. 10):

- *Text to be corrected: "Appendix J Section F"*
- ***Correct text: "Appendix F, Section F"***

E.2. Natural Resources on or near the Project Site
Subsection g. Geologic features (p.11):

- ***Delete "see attached response"***

Subsection l. Sole Source Aquifer (p.11):

- ***Add text: "See Appendix F Section F, additional information #3"***

Subsection o. endangered species (p. 12):

- *Text to be corrected: "Appendix J Section F"*
- ***Correct text: "Appendix F, Section F"***

(End)

ATTACHMENT A

ADDENDUM TO SHARPS COMPLIANCE, INC. ENGINEERING REPORT FOR REGULATED MEDICAL WASTE TRANSFER STATION (REVISED August 2, 2018)

APPENDIX I – DESTINATION FACILITY INFORMATION

Appendix I

Destination Facility Information

The following table contains information for each destination facility to which Sharps Compliance, Inc. will be transferring regulated medical waste:

Alpha Bio Med Services (Alpha)	
Name of Facility:	Alpha Bio-Med Services, LLC.
Address:	600 Industrial Road Nesquehoning, PA 18240
Contact Person:	David Martin (903) 693-2525
Type of Authorization:	Permit No. 400696 Authorization No. 884550 For the storage, transfer and treatment of RMW and Chemotherapeutic Wastes.
Permit Expiration Date:	July 28, 2026
Maximum Operating Capacity:	82 tons/day, 24 hours a day, seven days a week, Monday through Sunday.
Acceptance Letter:	**See Attachment 1**. Letter from the operator of the destination facility stating the amount of each type of material it will accept from Sharps transfer station including conditions it places on such acceptance.
Authorization to Operate:	**See Attachment 2**. Current copy of Alpha authorization to operate the destination facility.

WASTE TYPE AND AMOUNT TO BE SENT TO DESTINATION FACILITY:

Sharps will be transferring medical waste generated in a broad range of medical, diagnostic, therapeutic and research activities. Proper packaging, labeling and transportation of RMW will follow all mandated federal and state regulations. RMW will be properly segregated, packaged and labeled in a manner to maintain the integrity of the containers, prevent the leakage or release of waste from the containers, and provide protection from water, rain and the environment while handling and during transportation. On any given day Sharps may transfer RMW amounts not to exceed, in aggregate, 48 tons per day, Monday through Friday, of any of the RMW Types listed below. Exact proportions will vary, subject to maximum tonnage per day (TPD) limits:

RMW Type	Maximum TPD
Regulated Medical Waste - a soft waste material derived from the medical treatment, diagnosis, immunization, or biomedical research of human and animal. Soft medical waste includes (other than sharps) used rubber gloves, swabs, gauze, tongue depressors, and other similar material as defined in 25 Pa Code Chapter 271 and OSHA 29 CFR 1910.1030.	48
Sharps Medical Waste - medical waste object that is capable of cutting or penetrating skin or packaging material and that is contaminated with a pathogen or may become contaminated with pathogen derived from medical treatment, diagnosis, immunization, or biomedical research of human and animal. Sharps include used medical waste such as needles, syringes, scalpels, broken glass, culture slides, culture dishes, broken capillary tubes, broken rigid plastic, and exposed ends of dental wires as defined in OSHA 29	10

Appendix I

RMW Type	Maximum TPD
CFR 1910.1030.	
Pharmaceutical Waste - waste containing pharmaceuticals e.g. pharmaceuticals that are expired or no longer needed; items contaminated by or containing pharmaceuticals (bottles, boxes), which are not defined as Federal Hazardous Wastes.	4
Pathological Waste - Pathological waste includes animal carcasses, organs, tissues, body parts other than teeth, products of conception, and fluids removed by trauma or during surgery or autopsy or other medical procedure, and not fixed in formaldehyde.	10
Chemotherapeutic Waste -Vials or other containers that have less than 3% of the original contents by weight, after removing as much of the chemotherapy medicine as feasible. Waste includes: • Any empty chemotherapy containers or IV bags and tubing that did not hold either a P-listed, Chemotherapy medicine or a State-only hazardous waste, • All empty bags and tubing, needles, containers, gloves, and gowns with chemotherapy medicine remaining from use during chemotherapy infusions, • Any PPE or other materials used during chemotherapy infusions that are not visibly contaminated.	5
All sources in aggregate	48

UNAUTHORIZED WASTE:

The following table contains information for each destination facility to which Sharps Compliance, Inc. will be transferring unauthorized waste:

Radioactive Wastes - Destination Facility

Name of Facility:	EnergySolutions Services, Inc.
Address:	1560 Bear Creek Road Oak Ridge, TN 37830
Contact Person:	Donnie Brackett (865) 220-1526
Type of Authorization:	License Number: R-73006-L24 Amendment: 139 Authorization to receive, acquire, possess, store, unpack, process, decontaminate and/or transfer radioactive material.
Permit Expiration Date:	December 21, 2024
Authorization to Operate:	**See Attachment 3** - permit issued by the Tennessee Department of Environment and Conservation Division of Radiological Health.

Appendix I

Hazardous Wastes - Destination Facility

Name of Facility:	Veolia ES Technical Solutions, L.L.C
Address:	1 Eden Lane Flanders, NJ 07836 Mt. Olive Township/Morris County
Contact Person:	Peter Maraziti (973) 691-3933
Type of Authorization:	Facility Permit No.: HWP160001 EPA ID No.: NJD980536593 EPA Part B Permitted TSDF for treatment of hazardous waste.
Permit Expiration Date:	November 22, 2021
Authorization to Operate:	**See Attachment 4** - Flanders, NJ Audit Package, Business & Environmental Audit Information, including Hazardous Waste Part B Permit cover page, issued by the State of New Jersey Department of Environmental Protection.

Solid Wastes - Destination Facility

Name of Facility:	American Recycling Management
Address:	172-33 Douglas Avenue Jamaica, NY 11433
Contact Person:	Robert Buffolino (718) 739-2301
Type of Authorization:	NY DEC 360 Permit# 2630700108
Permit Expiration Date:	May 20, 2019
Authorization to Operate:	**See Attachment 5** - MSW (Residential/Institutional & Commercial), Corrugated Cardboard, Metals (Ferrous & Non-Ferrous).

alpha bio med
SERVICES
A SHARPS COMPLIANCE COMPANY

Date: 04/24/2018
To: Al Aladwani, V.P of Quality
Sharps Compliance, Inc.
9220 Kirby Drive, Suite 500
Houston, TX 77054

From: David Martin, Operations Director
Alpha Bio/Med Services, LLC.
600 Industrial Rd
Nesquehoning, PA 18240

Subject: Regulated Medical Waste Services

Dear Mr. Aladwani,

Alpha Bio/Med Services, LLC., (Alpha) is pleased to submit its proposal through this transmittal letter to Sharps Compliance, Inc., (Sharps) located at 893 Shepherd Ave, Brooklyn, NY 11208. in response to master agreement request for the treatment and disposal of regulated medical waste and chemotherapeutic waste (RMW) as set forth by Commonwealth of Pennsylvania Department of Environmental Protection 25 Pa. Code Section 271.1.

The work to be completed under this Agreement will consist of the treatment, disposal and cleaning and disinfection of reusable RMW containers. Alpha will maintain adequate storage and treatment capacity and guarantee acceptance of the Minimum Daily Quantity of 48 tons per day, 24 hours a day, 7 days a week Monday to Sunday of any of the waste type mentioned above.

Facility Information:

Alpha Facility Information	
Name of Facility	Alpha Bio-Med Services, LLC.
Address	600 Industrial Road Nesquehoning, PA 18240
Contact Person	David Martin (903) 693-2525
Type of Authorization (Permit)	Permit No. 400696 Authorization No. 884550 (for the storage, transfer and treatment of RMW and Chemotherapeutic Wastes.
Permit Expiration Date	July 28, 2026
Maximum Operating Capacity	82 tons/day 24 hours a day, seven days a week, Monday through Sunday.

WASTE TYPE (s) ACCEPTED:

Alpha accepts RMW waste generated in a broad range of medical, diagnostic, therapeutic and research activities. The term "medical waste" includes biohazardous, biomedical, infectious or regulated medical waste as defined under federal, state or local laws, rules, regulations and guidelines. The work to be completed under this Agreement will consist of the treatment, disposal and cleaning and disinfection of reusable RMW containers. Alpha will maintain adequate storage and treatment capacity and guarantee acceptance of the Minimum Daily Quantity of 48 tons per day, 24 hours per day, 7 days a week Monday through Sunday of any of the following Waste Types:

alpha bio med SERVICES
A SHARPS COMPLIANCE COMPANY

- Regulated Medical Waste - a soft waste material derived from the medical treatment, diagnosis, immunization, or biomedical research of human and animal. Soft medical waste includes (other than sharps) used rubber gloves, swabs, gauze, tongue depressors, and other similar material as defined in 25 Pa Code Chapter 271 and OSHA 29 CFR 1910.1030.
- Sharps Medical Waste - medical waste object that is capable of cutting or penetrating skin or packaging material and that is contaminated with a pathogen or may become contaminated with pathogen derived from medical treatment, diagnosis, immunization, or biomedical research of human and animal. Sharps include used medical waste such as needles, syringes, scalpels, broken glass, culture slides, culture dishes, broken capillary tubes, broken rigid plastic, and exposed ends of dental wires as defined in OSHA 29 CFR 1910.1030.
- Pharmaceutical Waste - waste containing pharmaceuticals e.g. pharmaceuticals that are expired or no longer needed; items contaminated by or containing pharmaceuticals (bottles, boxes), which are not defined as Federal Hazardous Wastes.
- Pathological Waste - Pathological waste includes animal carcasses, organs, tissues, body parts other than teeth, products of conception, and fluids removed by trauma or during surgery or autopsy or other medical procedure, and not fixed in formaldehyde.
- Chemotherapeutic Waste -Vials or other containers that have less than 3% of the original contents by weight, after removing as much of the chemotherapy medicine as feasible. Waste includes:
  - Chemotherapy medicine or a State-only hazardous waste,
  - All empty bags and tubing, needles, containers, gloves, and gowns with chemotherapy medicine remaining from use during chemotherapy infusions,
  - Any PPE or other materials used during chemotherapy infusions that are not visibly contaminated.

Acceptance Conditions:

Proper packaging, labeling and transportation of RMW is mandated by federal and state regulations. RMW must be properly segregated, packaged and labeled in a manner to maintain the integrity of the containers, prevent the leakage or release of waste from the containers, and provide protection from water, rain and the environment while handling and during transportation. RMW packaging and labeling must comply with the following specifications:

RMW Containers Specifications		
Container Type	**Marking**	**Specification**
Sharps Containers	Red color and International Biohazard Symbol.	FDA Approved Class II.
RMW Containers	Any color container with the International Biohazard Symbol. Labeled with "Regulated Medical Waste", generator's name, address, phone number and date sealed.	Meets DOT requirements for Rigid, leak resistant and Tight-fitting covers. Red to ASTM Standards D1709 and D1922.
Pharmaceutical Containers	White and Blue Color Easily distinguished from Sharps, Chemo and other disposal containers.	Leak-Resistant Gasket and Absorbent Pad with tamper evident Label, sturdy, Rigid and meets both DOT and DHS requirements for content restrictions incineration.

Pathology Container	Any color container with the International Biohazard Symbol. Labeled with "PATHOLOGICAL WASTE", generator's name, address, phone number, date sealed and "Incineration Only"	Meets DOT requirements for Rigid, leak resistant and Tight-fitting covers. Red bag tested to ASTM D1709 D1922.
Chemotherapy Containers (Non-sharps)	Any color container, International Biohazard Symbol. Labeled CHEMOTHERAPEUTIC WASTE", generator's name, address, phone number and date sealed.	Meets DOT requirements for Rigid, leak resistant and Tight-fitting covers. Yellow bag to ASTM Standards D1709 and D1922.
Chemotherapy Sharps Container	Yellow color container with International Biohazard Symbol, labeled "CHEMOTHERAPEUTIC WASTE", generator's name, address, phone number and date sealed.	FDA Approved Class II.

My contact information is provided below. On behalf of Alpha Bio/Med Services, LLC., thank you for giving us the opportunity and we look forward to continuing a mutually rewarding partnership.

Sincerely,

David Martin

dmartin@sharpsinc.com
(903) 693-2525

3800-BL-WM0008A Rev. 1/96

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

Permit
For
Solid Waste Disposal and/or Processing Facility
FORM NO. 8

Permit No. 400696
Date Issued July 28, 2006
Date Expired July 28, 2026

Under the provisions of the Pennsylvania Solid Waste Management Act of July 7, 1980, Act 97, a permit for a solid waste disposal and/or processing facility at Presquehanna Borough in the County of Carbon is granted to (permittee) Alpha Bio-Med Services, LLC

(address) 9220 Kirby Drive, Suite 500

Houston, TX 77054

This permit is applicable to the facility located as: Alpha Bio-Med Services, LLC

and described as: Alpha Bio-Med Services, LLC

Latitude 40° 51' 48"

Longitude 75° 21' 42"

This permit is subject to modification, amendment and supplement by the Department of Environmental Protection and is further subject to revocation or suspension by the Department of Environmental Protection for any violation of the applicable laws or the rules and regulations adopted thereunder, for failure to comply in whole or in part with the conditions of this permit and the provisions set forth in the Application No. 400696 which is made a part hereof, or for causing any condition inimical to the public health, safety or welfare.

See Attachment for waste limitations and/or special Conditions

FOR THE DEPARTMENT OF
ENVIRONMENTAL PROTECTION

1. This permit is issued based on the assumption that the information submitted in Solid Waste Management Application No. 400696, Authorization No. 884770, referenced in Permit Condition 2, is accurate. Any inaccuracies found in this information may be grounds for revocation or modification of this permit and potential enforcement action.

2. This approved application consists of the following:

Form No./Letter	Form Title	Date/Revision
Form GI	Permit Application – General Information	[illegible]
Attachment 1	[illegible] Balled Associates and [illegible]	
Figure 1	Site Location Map	
Form A	Application for Municipal or Residual Waste Permit	[illegible]
Attachment 1	Newspaper Notice	
Attachment 2	County and Municipal Notifications	
Attachment 3	Contiguous Landowner Notifications	
Figure 1	Site Location Map	
Figure 2	Contiguous Landowner Map	
Form B	Professional Certification	11-9-15
Form B1	Application Form Certification	11-9-15
Form HWC	Compliance History Certification	[illegible]
Form D	Environmental Assessment Process for Municipal Waste Management Facilities	[illegible]
Attachment D1	Section A – Geology	
Attachment D2	Section B – Scenic Rivers	
Attachment D3	Section C – Wetlands	
Attachment D4	Section D – Parks	
Attachment D5	Section E – Fish, Game and Plants	
Attachment D6	Section F – Water Uses	
Attachment D7	Section G – Recreation	
Attachment D8	Section H – Historic/Archaeologic	
Attachment D9	Section I – Traffic	
Attachment D10		

Attachment D-1	Section K – Zoning and Land Use Section M – Air Quality Impact	
Form E	Conditional Consent of Landowner	[illegible]
Attachment E-1	Figure E-1 Site Location Map	
Form I	Contingency Plan for Emergency Conditions	11/9/15
Attachment I-1	PPC Plan	
Figure 1	Site Location Map	
Drawings:		
D-001	Site Plan	
D-002	Operational Plan	
	Building Layout	
D-003		
Appendices:	PA DEP Annual Inspection Form	
Appendix A	Directions to Emergency Medical Facilities	
Appendix B		
Form P	Incinerators and Other Processing Facilities	[illegible]/5/6/15
Attachment P1	Form P Narrative	
Attachment P2	Waste Processing Flow Diagram	
Attachment P3	Autoclave and Shredder Equipment Information	
Attachment P4	Standard Operating Plan (SOP)	
Form X	Radiation Protection Plan	[illegible]
Attachment X1	Radiation Protection Plan	
Attachment X2	Personnel Qualifications	
Attachment X3	Figure X-1 Operational Plan	
Form S	Municipal Waste Resource Facilities Siting	[illegible]
	for Resource Recovery and Other Facilities	
Attachment S-1	Form S Narrative	
Attachment S-2	Figures, Drawings and Tables	
Drawings:		
D-001		
D-002	Site Plan	
D-003	Operational Plan	
D-004	Building Layout	
	Closure Plan	
Figures		
Figure 3		
Figure 4	Preliminary Site Setback Evaluation	
Figure 5	Existing Building Elevations	
Table S-1	100 Year Floodplain	
	Facility Setback Requirements	

Permit No. [illegible]
Date Issued July 28, 2016
Date Expires July 28, 2026

Form I	Facility Plan – Operation and Maintenance Manual	11/9/15
Attachment I	Permit Narrative	
Form 28	Closure Cost and Bonding Worksheets	11/9/15
Attachment 28-1	Phase 1 Bonding Worksheets	
Attachment 28-2	Phase 1 Worksheet Supplemental Calculations	
Attachment 28-3	Phase 2 Bonding Worksheets	
Attachment 28-4	Phase 2 Worksheet Supplemental Calculations	
Attachment 28-5	Inflation Rate Calculations	
Form 14	Request for Approval to Process Infectious or Chemotherapeutic Waste Streams	11/9/15
	Response to Technical Review Deficiency Letter	5/6/16

3. Approval is herein granted for the operation of a commercial waste processing facility utilizing Mark Costello Model [illegible] autoclave or equivalent with a total capacity of 15 cubic yards (6 bin load at 2.5 cubic yards per bin) with 70 – 75 minutes cycle time, and SSI Shredding Systems Model QUAD Q55 or equivalent with the capacity of shredding 90 cubic yards per hour, for the treatment of waste conforming to the definition of regulated medical waste as set forth in 25 Pa. Code Section 271.1. Approval is herein granted for the facility to operate as a transfer station for waste conforming to the definition of regulated medical waste and chemotherapeutic waste as set forth in 25 Pa. Code Section 271.1. Acceptance of hazardous waste (as defined by 25 Pa. Code Section 261a), radioactive waste, residual waste, and other types of municipal waste is prohibited at this site.

4. This permit requires that the Contingency Plan for Emergency Conditions be implemented as described in DEP Form I of the approved application, subject to the following conditions:

A. The provisions of the approved plan shall be carried out whenever emergency situations arise which endanger public health and safety, or the environment.

B. A copy of the approved plan and any subsequent revisions shall be maintained onsite. All members of the facility's organization responsible for developing, implementing, and maintaining the plan, and all designated emergency coordinators shall be trained in and proficient with implementing the plan.

C. Additional copies of the approved plan shall be distributed to the county and local emergency management agencies, local fire departments and/or Hazmat Teams, local

emergency medical services, and local police departments to the extent to which they may become involved in an actual emergency.

D. The Contingency Plan for Emergency Conditions shall be periodically reviewed and, if necessary, updated. At a minimum, revisions must occur when:

1) Applicable Department regulations are revised;

2) The plan fails in an emergency;

3) The facility changes in its design, construction, operation, maintenance, or other circumstances, in a manner that materially increases the potential for fires, explosions or releases of toxic or hazardous constituents or which changes the response necessary in an emergency;

4) The list of emergency coordinators changes;

5) The list of emergency equipment changes; or

6) As otherwise required by the Department.

5. Approved wastes may be accepted at the facility twenty-four hours a day, seven days a week. Infectious Waste may be processed in the autoclave and shredder twenty-four hours a day, seven days a week, Monday through Sunday. Transfer operations may be conducted twenty-four hours a day, seven days a week, Monday through Sunday.

6. The facility is authorized to be constructed in two phases. Phase I shall operate with one autoclave. A second autoclave shall be added during the Phase II construction. Each autoclave is limited to a maximum daily volume of 41 tons per day. At the completion of Phase I construction, and prior to operation of the facility, Form 37 Certification of Construction Activity, including as-built report(s), and the appropriate validation testing data must be submitted to the Department.

Form 37, Certification of Construction Activity, including as-built report(s) and the appropriate validation testing data must be submitted to the Department after the construction of Phase II of the facility. The maximum operating capacity of the facility after completion of Phase II shall be 82 tons per day.

7. Bond Obligation: The Phase I bond in the amount of $141,300 approved by the Department on 30 June 2016 is hereby made a part of this permit approval. Before operation of Phase II the facility shall obtain the necessary additional bonding approval from the Department. The bond shall be recalculated annually with the annual operations report.

8. Autoclave operating parameters shall be established in accordance with the following (as set forth in 25 PA Code Section 284.322(c)):

A. For facilities with one autoclave or multiple autoclaves that are not identical, each autoclave must have an initial validation test that establishes its operating parameters.

B. For facilities with multiple autoclaves that are identical, one autoclave may have an initial validation test that establishes the operating parameters for all identical autoclaves at that facility.

C. Autoclaves shall be tested using the manufacturer's recommended vacuum pulse plan, operating temperature, operating pressure and residence time at the maximum weight and with the most difficult heat transfer challenge anticipated with the indicators located where disinfection would be most difficult to achieve.

D. If multiple vacuum pulse plans, residence times, temperatures and pressures are recommended, the autoclave shall be tested to validate its performance at each recommended vacuum pulse plan, residence time, temperature and pressure. If a test fails, more stringent operating parameters shall be used incrementally until a satisfactory test and set of operating parameters is determined.

E. Autoclave operating parameters must be validated to achieve a minimum of 250°F or 121°C measured at a point where disinfection would be most difficult to achieve.

F. The residence time required to achieve a 6 log 10 reduction of mycobacteria and a 4 log 10 reduction of Geobacillus stearothermophilus spores for the level of heat transfer challenge selected shall be the residence time set into that autoclave's controls.

G. The vacuum pulse plan, residence time, operating temperature and operating pressure established in the validation test will become the permitted operating parameters for the autoclave tested.

9. The facility shall monitor the regulated medical waste process to ensure the following:

A. The process shall be capable of inactivating mycobacteria at a 6 log 10 reduction or greater.

B. The process shall be capable of inactivating Geobacillus stearothermophilus spores, Bacillus pumilus or Bacillus atrophaeus spores at a 4 log 10 reduction or greater.

10. The facility shall perform process analysis capable of inactivating mycobacteria at a 6 log 10 reduction or greater. The analyses shall be conducted, at a minimum, every 40 hours of autoclave operation. The analyses shall be made available to the Department upon request.

11. The indicator used for autoclave disinfection shall be located prior to disinfection at a point within the load where disinfection will be most difficult to achieve.

12. Unless the Department approves another indicator or test in writing, Geobacillus stearothermophilus shall be used as indicator to establish and verify the autoclave process.

13. The regulated medical waste will be considered to be infectious after disinfection unless the indicator spores are determined by microbiological analysis to have been destroyed in accordance with Condition 8.

14. The facility shall comply with the following:

A. The processing of pathological waste is prohibited.

B. The processing of chemotherapeutic waste is prohibited.

15. Compactors, grinders or similar devices may not be used to reduce the volume of regulated medical waste before the waste has been rendered noninfectious. If the volume reduction device is within a continuous, enclosed disinfection process and part of the processing system, then the reduction device may be used.

16. The disinfected regulated medical waste or other processing residue from the facility shall be disposed in a landfill that has been approved by the Department to accept the waste, if the waste is disposed in the Commonwealth.

17. Unless otherwise approved in writing by the Department, an operator of an autoclave facility shall employ the procedures in § 284.322 (relating to autoclave validation testing requirements) to validate the operating parameters and protocols of the processing equipment. These procedures must be employed at an on-going frequency specified by the manufacturer of the autoclave and in the following circumstances:

A. When a new autoclave is installed.

B. When an autoclave is modified, repaired or has experienced a malfunction with respect to hardware, software, controls or ancillary equipment.

18. The facility shall maintain a record of the autoclave validation testing protocols and procedures for a minimum of two years.

19. Regulated medical and chemotherapeutic waste shall be stored and contained in a manner that:

A. Maintains the integrity of the containers, prevents leakage or release of waste from the containers, and provides protection from water, rain, and wind.

B. Prevents the spread of regulated medical waste or chemotherapeutic agents.

C. Affords protection from animals and does not provide a breeding place or a food source for insects or rodents.

D. Maintains the waste in non-putrescent state, using refrigeration (≤ 7°C) or freezing (≤ -18°C) when necessary.

E. Prevents odors from emanating from the container.

F. Prevents unauthorized access to the waste. As part of this requirement, the following shall be met:

1) Enclosures and containers used for storage of infectious and chemotherapeutic waste shall be secured to deny access to unauthorized persons.

2) Enclosures and containers shall also be marked with prominent warning signs indicating the storage of infectious or chemotherapeutic waste.

D. Enclosures that are used for the storage of infectious or chemotherapeutic waste shall be constructed of finish materials that are impermeable and capable of being readily maintained in a sanitary condition. Storage areas shall be ventilated to minimize human exposure to the [illegible].

E. Regulated medical and chemotherapeutic waste may not be commingled with other waste in the same container.

[illegible] Regulated medical and chemotherapeutic waste may not be stored at the facility for more than the following periods:

A. Seventy-two hours at an ambient temperature, unless the waste becomes putrescent or attracts vectors.

B. Seven days in a refrigerator at ≤ 7°C, unless the waste becomes putrescent or attracts vectors.

C. Thirty days in a freezer at ≤ -18°C, unless the waste becomes putrescent or attracts vectors.

[illegible] This permit requires that the Radiation Protection Plan be implemented as described in the Form [illegible] of the approved application, subject to the following conditions:

A. All waste delivered to the facility shall be monitored according to the approved Radiation Protection Plan.

B. The Department reserves the right to recover costs associated with Department involvement in activities related to the Radiation Protection Plan.

C. The permittee shall maintain records of each instance in which radioactive material is detected at the site for the life of the facility. A summary of radiation monitoring indicating, at a minimum, the date of detection, alarm level, identified radionuclide, and disposition of the radioactive material, shall be compiled for each calendar year and included in the Annual Operation Report submitted in accordance with Permit Condition No. 18 below.

[illegible] Prior to commencing waste acceptance at the facility, the Permittee shall develop a report acceptable to DEP that provides the following minimum information for each generator or consolidator and transporter of waste accepted for processing at the facility for each calendar quarter reporting period:

A. For each waste stream received at the permitted facility during the quarter (except waste [illegible] from residential [illegible]):

1) The permittee assigned application number.
2) The source of the waste.
3) The types of the waste.
4) The amount of each type of waste.

5) The disposition of the waste processed on site, awaiting processing, transferred off site or awaiting off-site processing.

B. Additionally, the following shall be included in any quarterly report:

1) A description of waste handling problems or emergency disposal activities.
2) A record of deviations from the approved design or operational plans.
3) A record of rejected waste loads and the reasons for rejecting the loads.
4) A record of each incident in which radioactive material is detected in waste loads.
5) Certification that the process has met the requirements of Conditions 8 and 9 regarding microbiological analysis.

Reports shall be maintained at the facility for a minimum of two years.

For the purposes of this condition, nonaffiliated transporters shall mean transporters not affiliated with the Permittee (Alpha Bio-Med Services, LLC) or third parties. Calendar quarter reporting periods shall be January 1 through March 31, April 1 through June 30, July 1 through September 30, and October 1 through December 31. Compliance with this condition shall be deemed to satisfy the requirements of 25 Pa. Code § 271.611.

23. The quarterly report shall be submitted no later than thirty (30) days after the end of each calendar quarter, beginning with the first quarter waste is accepted. The quarterly report shall be submitted to the Department's Northeast Regional Office, 2 Public Square, Wilkes-Barre, PA 18701: Waste Management Program Manager.

24. Regulated medical or chemotherapeutic waste shall be placed in containers that are leak-proof, impervious to moisture, and sufficient in strength to prevent puncturing, tearing, or bursting during storage. Additionally, used sharps shall be stored in containers that are rigid, tightly lidded, and puncture resistant.

25. Prior to onsite or offsite transportation of regulated medical or chemotherapeutic waste, the outermost container of regulated medical or chemotherapeutic waste must be labeled with the following:

A. The words "chemotherapeutic waste" if chemotherapeutic waste is placed in the container.

B. Until November 8, 2016, the words "infectious waste" or "regulated medical waste" if regulated medical waste is placed in the container.

C. After November 8, 2016, the words "regulated medical waste" if regulated medical waste is placed in the container.

D. The universal biohazard symbol that conforms to the design in 29 CFR 1910.1030(g)(1)(i)(B) (relating to bloodborne pathogens) and the word "BIOHAZARD."

E. The date the container was full or the date that the generator sealed the container, whichever occurs earlier.

F. The name, address and telephone number of the generator if the waste is transported offsite.

26. The requirements of Condition 25 A. are met only if the outermost container is a vehicle or conveyance, including a roll-off, and the following are satisfied:

A. The waste in the vehicle or conveyance is from a single generator.

B. The vehicle or conveyance is transported offsite for processing or disposal every 30 days.

C. The vehicle or conveyance complies with the requirements of §381.0098 (relating to transportation of regulated medical and chemotherapeutic waste, as related provisions).

D. The outside of the vehicle or conveyance displays the information required in Condition 25(E) of this permit, except when a record of the date the vehicle or conveyance is full or sealed, whichever occurs earlier, is maintained by the generator and available for inspection by the transporter or Department for 1 year.

E. The outside of the vehicle or conveyance displays the information required in Condition 25(F) of this permit.

27. Nonwall-mounted used sharps containers storing regulated medical waste must have fluorescent orange, orange-red or red markings and chemotherapeutic waste must have yellow markings. The markings must sufficiently identify the waste as regulated medical or chemotherapeutic waste.

28. The information required under Section 284.4 (relating to marking of containers), must be clearly legible and produced with indelible ink in a color that contrasts with the color of the container, such as black. If a label is used to provide the information, the label must be securely attached to the container.

29. Reuse of containers shall follow the guidelines below:

A. Nonrigid containers shall be managed as either regulated medical or chemotherapeutic waste based upon the contents of the container. These containers may not be reused.

B. Corrugated fiberboard containers used for storage of regulated medical or chemotherapeutic waste may be reused if the surface of the container has been protected from direct contact with the waste.

C. A rigid, nonfiberboard container used for the storage of regulated medical waste or chemotherapeutic waste may be reused if one of the following applies:

1) The container has been decontaminated utilizing a Department-approved disinfection procedure.
2) The surface of the container has been protected from direct contact with regulated medical and chemotherapeutic waste, as applicable.

30. In accordance with Section 284.419, processing residue from regulated medical or chemotherapeutic waste processing facilities shall be stored in an enclosed container, which

may be stored in a properly disposed container or in an enclosed room, which may include an adequately ventilated building, to:

A. Prevent the release, disposal or discharge of processing residue into the air, water or onto land.

B. Afford protection from animals, rain and wind.

C. Prevent the development of a breeding place or food source for insects or rodents.

D. Prevent the leakage of waste from the storage container.

31. Processing residue from a regulated medical or chemotherapeutic waste processing facility may be commingled with other municipal waste if the commingled waste is from one generator and discharge of the commingled waste is in accordance with Condition 30 above.

32. Regulated medical waste, chemotherapeutic waste or processed regulated medical or chemotherapeutic waste that is recognizable may be transported to or from a transfer facility in accordance with the following:

A. The transfer facility is permitted by the Department.

A. If transported to a transfer facility, the transfer facility shall be considered the designated facility for purposes of this permit.

C. If transported from the transfer facility to a processing or disposal facility, the transfer facility shall be considered the generator and the processing or disposal facility shall be considered the designated facility for purposes of this permit.

33. The following guidelines shall be adhered to in preparation and use of log and shipping papers for the transportation of regulated medical or chemotherapeutic waste, per Section [illegible]:

A. Before transporting regulated medical or chemotherapeutic waste or processed regulated medical or chemotherapeutic waste that is recognizable, the transporter shall provide the generator with a dated signature, including, but not limited to, handwritten, electronic or stamped signatures, from an authorized representative of the transporter acknowledging that the transporter has accepted the waste from the generator on the date of acceptance.

B. The transporter shall ensure that the log or shipping paper required under subsections (c) and (d) accompanies the waste shipment.

C. A transporter who delivers regulated medical or chemotherapeutic waste or processed recognizable waste to the designated processing or disposal facility shall create a log or shipping paper containing the following information:

1) The date that each shipment of waste was delivered to a designated facility.
2) The name and address of the designated facility for each shipment of waste.

D. The transporter who delivers regulated medical or chemotherapeutic waste to another transporter shall create a log or shipping paper containing the following information:

1) The date each container of waste was delivered to the subsequent transporter.

2) The name and address of the sub-sequent transporter that received each container of waste.

F. At the time the waste is delivered to the designated facility the transporter shall provide the operator of the designated facility or subsequent transporter with a log or shipping paper containing the following information:

1) The name, mailing address and telephone number of the generator for each container of waste.

2) The number of containers, types of containers and the total quantity of the waste by weight or volume for each generator.

G. After the waste has been transported to the designated facility, the transporter shall provide the operator with a log or shipping paper containing the following information:

1) The name, mailing address and telephone number of the designated facility that received each container of the generator's waste.

2) The number of containers, types of containers and the total quantity of the waste by weight or volume received by each designated facility.

3) The date that each designated facility received each container of the generator's waste.

4) Acknowledgement from the designated facility that it accepted each container of the generator's waste.

14 Log or shipping papers shall be used for waste acceptance at the facility per Chapter 284 and Subchapter H of the regulations.

A. An operator of a designated facility may not receive shipments of regulated medical or chemotherapeutic waste or processed regulated medical or chemotherapeutic waste that is unrecognizable from other sources unless the shipment is accompanied by a log or shipping paper.

B. The operator of the designated facility shall:

1) Examine the contents of the transporter.

2) Note significant discrepancies in the log or shipping paper of the generator and transporter as defined in Condition 15.

3) Provide the transporter with a dated signature, including but not limited to, handwritten, electronic or stamped signature, of the authorized representative of the facility, acknowledging that it has accepted the waste from the transporter on the date.

15 This condition applies to significant discrepancies in the logs or shipping papers of the generator or transporter. A discrepancy is a difference between the quantity or type of waste described in the log or shipping paper, and the quantity or type of waste a facility actually receives. A significant discrepancy means if one or more of the following apply:

A. There is a variation greater than 5% in weight for bulk waste.

B. There is a variation in piece count for bulk waste, excluding 1% variation for generator-loaded trucks.

C. There is a difference in waste type which can be discovered by inspection or waste analysis.

36. If there is a significant discrepancy in the logs or shipping papers, the operator shall attempt to reconcile the discrepancy before the waste is processed or disposed of at the facility or before the waste is accepted at a transfer facility. If the discrepancy is not resolved within 5 business days of receipt of the waste, the operator shall immediately notify the appropriate regional office of the Department by telephone. Within 7 business days of receipt of the waste, the operator shall also send a letter to the regional office describing the discrepancy and attempts to reconcile it.

37. The records required under this permit shall be retained for at least 5 years from the date on which the record was prepared. Records shall be submitted to the Department upon request. The retention period will be extended automatically during the course of an enforcement action or as requested by the Department.

38. This permit is issued in accordance with the Solid Waste Management Act, the Act of July 7, 1980, P.L. 380, 35 P.S. Section 6018.101 et seq.; Municipal Waste Planning, Recycling and Waste Reduction Act of 1988, 53 P.S. Sections 4000.101-4000.1904; Air Pollution Control Act of January 8, 1960, P.L. 2119, 35 P.S. Sections 4001–4015 et seq.; the Clean Streams Law, Act of June 22, 1937, P.L. 1987, as amended and the regulations promulgated pursuant to these acts.

39. If there is a conflict between the application, its supporting documents and/or amendments and the terms and conditions of this permit, the terms and conditions of this permit shall apply.

40. Any final operational, design or other plan developed subsequent to permit issuance which exhibits changes in structure, location, specification or other changes of substance shall be submitted to the Department for subsequent permit action. Any deviation from the plans herein approved shall not be implemented before first obtaining a permit amendment or written approval from the Department.

41. Approval of any plans or facilities herein refers to the functional design only and does not guarantee operational efficiency. Failure of the measures and facilities herein approved to perform as intended, or as designed, or in compliance with the applicable laws, rules and regulations, and terms and conditions of this permit, for any reason, shall be grounds for the revocation or suspension of the permittee's approval to operate under this permit.

42. This permit shall not be construed to supersede, amend, or authorize a violation of any of the provisions of any valid and applicable local law, ordinance, or regulations; providing that said

local law, ordinance, regulation, or condition is not preempted by the Pennsylvania Solid Waste Management Act, the Act of July 7, 1980, P.L. 380, No. 97, 35 P.S. 6018.101 et seq. or the Municipal Waste Planning, Recycling and Waste Reduction Act of 1988, 53 P.S. Sections 4000.101-4000.1904.

43. This permit does not authorize nor shall be construed as an approval to discharge industrial waste, including without limitation, any leachate discharge from the permitted area without first obtaining necessary permits required by the Clean Streams Law.

44. As required by 25 Pa. Code Section 271.211(d), Conditions of Permit, the permittee shall notify the Department within 45 days, on a form prepared by the Department, after the transfer has occurred of a controlling interest in the owner or operator, if the transfer does not require a permit modification under Section 271.144 (relating to public notice and public hearings for permit modifications) or a permit reissuance under Section 271.221 (relating to permit reissuance). The notification shall contain the same information relating to the person who obtained the controlling interest as is required of a permit applicant in a permit application under Sections 271.124 and 271.125(a) - municipal (relating to identification of interests and compliance information). A "controlling interest" means the possession, direct or indirect, of the power to direct or cause the direction of the management and policies of a person, whether through the ownership of voting securities, by contract or otherwise.

45. As a condition of this permit and of the permittee's authority to conduct the activities authorized by this permit, the permittee hereby authorizes and consents to allow authorized employees or agents of the Department, without advance notice or search warrant, upon presentation of appropriate credentials and without delay, to have access and to inspect all areas on permittee controlled sites and areas where solid waste management activities are being, or will be conducted. This authorization and consent shall include consent to collect samples of waste, water, or gases; to take photographs; to perform measurements, surveys, and other tests; to inspect any monitoring equipment; to inspect the methods of operation; and to inspect and/or copy documents, books, and papers required by the Department. This permit condition is referenced in accordance with Sections 608 and 610.7 of the Solid Waste Management Act and 25 Pa. Code Section 271.123.

46. Any change to independent contractors or agents retained by the permittee to construct or operate this site shall be subject to prior compliance history review by the Department as specified by the Pennsylvania Solid Waste Management Act, the Act of July 7, 1980, P.L. 380, No. 97, 35 P.S. 6018.101, et seq.

47. Certification of the equipment installation at this facility shall be submitted to the Department by a professional engineer, registered in the Commonwealth of Pennsylvania, upon completion of construction. The permittee must notify the Department in writing within seventy-two (72) hours, before commencing construction. The permittee shall submit one original and one copy

of as-built drawings and the construction certification report document to the Department upon completion of the construction activity.

The Department must approve certification reports prior to any waste processing.
A registered Pennsylvania professional engineer shall certify in writing on forms provided by the Department, for each phase of the construction, under penalty of law pursuant to sworn falsification to authorities (18 Pa. C.S. Section 4904), that he or she has personally examined the construction of said phase and it is constructed and prepared in accordance with the documents, plans, design and standards made a part of the application as approved by the Department.

48. Copies of the Annual Operation Report as required in 25 Pa. Code Sections [illegible].262 and 283.262 shall be submitted to the Department on or before June 30 of each year. The Annual Operation Report shall be submitted on forms provided by the Department or other approved format. An original and one copy of the Annual Operation Report shall be submitted to:

Department of Environmental Protection
Program Manager, Waste Management Program
2 Public Square
Wilkes-Barre, PA 18701

RHS 8-7

GALLAHER RD.

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF RADIOLOGICAL HEALTH
William R. Snodgrass TN Tower 312 Rosa L. Parks Avenue, 15th Floor Nashville, TN 37243
615-532-0364

RADIOACTIVE MATERIAL LICENSE

Amendment 139

Pursuant to Tennessee Department of Environment and Conservation Regulations, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer radioactive material listed below; and to use such radioactive material for the purpose(s) and at the place(s) designated below. This license is subject to all applicable rules and regulations of the Tennessee Department of Environment and Conservation and orders of the Division of Radiological Health, now or hereafter in effect and to any conditions specified below.

LICENSEE	3. License number
1. Name EnergySolutions Services, Inc.	R-73006-L24
	4. Expiration date: December 31, 2024
2. Address 1560 Bear Creek Road Oak Ridge, TN 37830	5. File no. R-73006

6. Radioactive Material (Element and Mass Number)	8. Chemical and/or physical form	9. Maximum Radioactivity and/or quantity of material which licensee may possess at any one time.
SEE SUPPLEMENTARY SHEETS		

10. Authorized Use

SEE SUPPLEMENTARY SHEETS

CONDITIONS

11. Unless otherwise specified, the authorized place of use is the licensee's address stated in Item 2 above.

For the Commissioner
Tennessee Department of Environment and Conservation

Date of Issuance: September 12, 2017

By: _____

Division of Radiological Health
Ronald J. Parsons, Environmental Consultant

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6. Radioactive Material (Element and Mass Number)	8. Chemical and/or Physical Form	9. Maximum Radioactivity and/or Quantity of Material Which Licensee May Possess at Any One Time
A. Mixed activation and fission products with atomic numbers 3-83 inclusive (not Carbon 14 or Iron 55)	A. Any form suitable for transport under U.S. DOT Regulations	A. 500 Curies
B. Hydrogen 3	B. Same as 8.A.	B. 500 Curies
C. Carbon 14.	C. Same as 8.A.	C. 100 Curies
D. Iron 55	D. Same as 8.A.	D. 500 Curies
E. Polonium 210	E. Same as 8.A.	E. 20 Curies
F. Radium 226	F. Same as 8.A.	F. 20 Curies
G. Thorium 232	G. Same as 8.A.	G. 20 Curies
H. Uranium-depleted and Natural	H. Same as 8.A.	H. 100 Curies
I. Uranium (not Uranium 233, Uranium 235, or Uranium 238)	I. Same as 8.A.	I. 2.5 Curies
J. Uranium 233	J. Same as 8.A.	J. 200 grams *
K. Uranium-enriched in Uranium 235	K. Same as 8.A.	K. 350 grams * of contained U-235
L. Plutonium	L. Same as 8.A.	L. 200 grams *
M. Americium 241	M. Same as 8.A.	M. 100 Curies

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N.	Transuranics (not Plutonium or Americium 241)	N. Same as 8.A.	N. 2.5 Curies
O.	Radioactive materials with atomic numbers 84-91, inclusive (not Polonium 210, Radium 226, or Thorium 232)	O. Same as 8.A.	O. 2.5 Curies
P.	Any radioactive material (except special nuclear)	P. Sealed sources (Model numbers listed in NRC registry of Sealed Sources and Devices), surface-deposited disc and plane sources, and volumetric reference sources)	P. No single source to exceed 5 millicuries. Total not to exceed 10 millicuries.

Note:
* For each kind of special nuclear material, determine the ratio between the quantity of that special nuclear material and the quantity specified here for the same kind of special nuclear material. The sums of such ratios for all kinds of special nuclear material in combination shall not exceed "1" (i.e., unity).

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10. Authorized Use

10.A.through O. Receipt, possession, storage, unpacking, processing, decontamination, release for unrestricted use, repacking, and transfer of radioactive waste when packaged in accordance with U.S. Department of Transportation requirements for interstate commerce in accordance with statements, representations, and procedures contained in documents referenced in conditions of this license.

P. Instrumentation standardization and/or calibration sources.

Conditions (continued)

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12. The licensee shall comply with applicable provisions of 0400-20-04, 0400-20-05, 0400-20-10, and 0400-20-13 of "State Regulations for Protection Against Radiation."

13. Radioactive material authorized by this license shall be used and stored at Energy*Solutions* Services, Inc., 628 Gallaher Road, Kingston, TN 37763.

14. A. Radioactive material authorized by this license shall be used by, or under the supervision of, the following Authorized Users as specified:
Site Operations

    1. An Operations Authorized User shall be on-site during all licensed operations as specified per Section VI, items B, C, D, and F of application dated May 29, 2014, with attachments.

    2. A Radiation Safety Technician (RST) shall be present on-site during all licensed operations as specified per Section VI, items B, C, D, and F of application dated May 29, 2014, with attachments.

    3. Operations Authorized Users

       Phillip Booher, Brian Crabtree, Jeff Dickinson, Clint Evans, Leona Gillam, Eddie James, Keith Schillings, Donna Webb, Brian Parsons, Roger Jones, Josh Cox, Chris Thurman, or Jack Clark

    Site Logistics

    1. A Logistics Authorized User shall be on-site during all licensed operations involving the movement and transshipment of radioactive material.

    2. A Radiation Safety Technician (RST) shall be present on-site during all licensed operations as specified per Section VI, items A and E of application dated May 29, 2014, with attachments.

    Site Logistics Authorized Users

       Nick Arden, Brian Mayes, Brad Melton, Fred Schulz, Jason Stafford, Brett Grizzard, Don McCullough, David Phillips, Tracy Shelton, Ronald Hamilton, Mike Phillips, Dwayne Wilkey, Jeffery Saffell, or Allen Duncan

B. The Radiation Safety Officer for this license is Duane R. Quayle.

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15. A. The licensee shall develop and maintain a written radiation protection manual that ensures the implementation of the radiation protection program in accordance with "State Regulations for Protection Against Radiation" (SRPAR), ALARA, and documents referenced in conditions of this license. Changes to this manual require prior written approval from the Department.

B. In addition, the licensee shall develop and implement written standard operating procedures to ensure all activities involving the handling and/or use of radioactive materials authorized by this license are carried out in a manner consistent with SRPAR, ALARA, the licensee's radiation protection manual, and the documents referenced in conditions of this license.

C. These procedures may be modified without prior approval of the Department when deemed appropriate and documented by the Radiation Safety Officer. However, adherence to the current procedures as written shall be considered a condition of this license. The written procedures required by this condition shall be available for inspection by the Department. A copy of the current procedures shall be forwarded to the Department upon request.

16. Bulk Survey for Release (BSFR)

A. The licensee is authorized to conduct the Bulk Waste Assay Program (BWAP) which includes Green is Clean (GIC) processing, Safe Check gamma processing, Safe Check non-gamma processing, and Decay Check. The BWAP shall be conducted in accordance with statements, representations, and procedures contained in documents referenced in conditions of this license. The Radium 226 disposal limit for Carter Valley Landfill, North Shelby Landfill, and South Shelby Landfill will be 5 pCi per gram.

B. The licensee is authorized to implement BWAP release limits for Carter Valley Landfill, North Shelby Landfill, and South Shelby Landfill disposal of Safe Check and Decay Check program licensed material in accordance with statements, representations, and procedures contained in application dated May 29, 2014, with attachments, letter dated April 15, 2015, with attachments, letter dated January 29, 2016, with attachments, including "Technical Basis for Safe Check and Decay Check Conditional Release Limits," Revision 6., and letters dated November 15, 2016, with attachments, August 3, 2017, with attachments, and the most current BSFR concentration limits established by the Division of Radiological Health for Carter Valley Landfill, North Shelby Landfill, and South Shelby Landfill.

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C. Records of all disposals made under this condition shall be submitted quarterly to the Division of Radiological Health, William R. Snodgrass Tennessee Tower, 15th Floor, 312 Rosa L. Parks Avenue, Nashville, Tennessee 37243. Monitoring of materials for contamination for release as authorized by this condition is only to be conducted at the licensee's facilities specified in Condition 13 of this license, and not at customer or other job sites.

D. The licensee shall meet the requirements of the March 2017 "Licensing Requirements for Evaluation and Acceptance of Licensee Requests for the Disposal of Materials with Extremely Low Levels of Contamination in Class 1 (Subtitle D) Landfills."

E. For calendar year 2017 the licensee is approved to dispose of 2102 tons of material in the Carter Valley Landfill. This is a combined disposal limit with EnergySolutions R-73016-G25. For calendar year 2017 the licensee is authorized to dispose of 871 tons of material in the North Shelby Landfill. For calendar year 2017 the licensee is authorized to dispose of 1279 tons of material in the South Shelby Landfill.

17. A. The Box Assay System shall be operated in accordance with the requirements and specifications found in the "Technical Basis for Design and Calibration of the Energy*Solutions* Box Assay System," Revision 2. Additionally, the waste density shall not exceed 3.0 g/cc, the volume of waste assayed in any single container shall have multiple counts to ensure each four-foot by six-foot cross section (or less) of the container or item is assayed by the system.

B. The Gardian Assay System shall be operated in accordance with the requirements and specifications found in the "Technical Basis for Design, Calibration, and Operation of the Gardian Mobile Assay System," Revision 0.

18. The licensee is authorized to release asphalt/concrete from areas previously used for radioactive material storage in accordance with statements, representations, and procedures contained in the Energy*Solutions* Radiation Safety Guide (RSG-1). Asphalt/concrete released in accordance with this condition shall not be reintroduced to the general public for use as fill or recycling. Excavated material containing no detectable radioactivity when assayed in accordance with the current BWAP program requirements may be used as clean fill at the licensee's nearby Bear Creek site.

19. A. No radioactive material (excluding calibration and standardization sources) or radioactive waste (radioactive material that has no further use that is dispositioned for disposal) may be possessed under this license (to also include waste generated under the authority of this license) , from the time of receipt until its transfer from the facility, for a period of time greater than three hundred sixty five (365) days. The

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exceptions to this constraint are with respect to equipment, specifically licensed or otherwise authorized, and stored on-site for future use: (1) at a location authorized

by an Energy*Solutions* Services, Inc. Tennessee Radioactive Material License or (2) at a location where such equipment is authorized by the agency having jurisdiction.

B. No radioactive material or radioactive waste may be stored so as to exceed the following stacking limits:

Container Type	Stacking Limit
1. Drums	3 high
2. B-25 Boxes	3 high
3. B-12 Boxes	5 high
4. Sea-Land Cont.	2 high
5. Any other strong tight container	10 feet nominal

20. Radioactive material, contaminated equipment, and empty radioactive material containers may be stored in accordance with statements representations, and procedures contained in documents referenced in this license, provided that radiation levels for unrestricted areas are not exceeded. This material must be stored in either locked DOT intermodal containers as described in Title 49 Code of Federal Regulations (CFR), Part 171.8 or DOT approved strong tight containers. In addition to these requirements the following criteria and restrictions must be adhered to whenever radioactive materials are stored:

1. Containers used for outside storage of radioactive materials must be capable of withstanding environmental conditions.

2. Radiation levels from stored empty containers shall not exceed an average of 0.5 mR/hr, and hot spot activity shall not exceed 2 mR/hr.

3. Outside storage of containers with radioactive waste and/or DOT Empty containers is only permitted in paved (asphalt or concrete) areas. Storage on grass, dirt, or gravel is specifically prohibited.

4. Soil samples must be collected and analyzed at least quarterly along the edges of outside asphalt or concrete pads where radioactive materials are stored and along the perimeter fence to ensure that there is no buildup of radioactive contamination. Data from these samples must be maintained for inspection by the Department.

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5. Each designated outside storage area shall be equipped with identifiable markers (sign postings) at each corner to clearly identify the boundary of the bonded storage area. In addition, the space between these markers can be painted or otherwise marked to identify the storage area.

6. Energy*Solutions* Empty containers are permitted to be stored on any surface (e.g. paved, grass, dirt, or gravel) within any area of the facility that is routinely monitored by the environmental sampling program for radioactivity per the RSG-1.

7. Green is Clean Empty containers may be stored in any location within the facility.

The combined authorizations for storage granted by this license shall not exceed a total of 75, 928.4 square feet.

21. The licensee shall maintain complete and accurate records of the receipt and disposal of radioactive material. The licensee shall, for radioactive material no longer useful for any purpose and for any equipment or supplies contaminated with such material for which further use and decontamination are not planned, define those materials as radioactive waste and treat them as such in accordance with the following provisions:

A. Radioactive waste material shall not be stored with non-radioactive waste.

B. A written record of all radioactive waste material shall be maintained until it has been determined by a suitable survey or radioassay that it has decayed to background levels or until it has been shipped to an authorized recipient in accordance with applicable regulations. Accountability of radioactive waste material prepared for shipment but not yet shipped from the licensee's premises shall be maintained by the licensee by an internal record system such that the licensee is constantly aware of the material's location and the proposed time of shipment. Individuals who are involved in the shipping of such material and/or the storage of such material prior to shipment, shall be trained in the precautions necessary for such handling and storage.

C. For material which has decayed to background levels as determined by radioassay or external level as measured with appropriately calibrated instruments, records shall indicate that the material was determined to be no longer radioactive and will indicate the methods and results of the survey or analysis.

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D. Shipment records of radioactive waste material shall be maintained and the licensee shall require written confirmation from the authorized recipient of such material that this material has been received.

E. Transfer of radioactive waste to a land disposal facility or a licensed waste handler shall be done in accordance with 0400-20-05-.125 of "State Regulations for Protection Against Radiation."

F. All records and written confirmations required by this condition shall be maintained for inspection by the Department.

The requirements of this condition are in addition to any other requirements for the handling and/or disposal of radioactive material contained in this license and "State Regulations for Protection Against Radiation."

22. The licensee shall not accept either radioactive waste and/or items contaminated or potentially contaminated with licensable quantities of radioactive material or radioactive materials or items from licensable activities for repackaging, processing, refurbishing, storage pending disposal or disposal unless the shipper of such waste possesses a valid license for delivery issued pursuant to 0400-20-10-.32 of "State Regulations for Protection Against Radiation."

23. Written assurances must be furnished by the facility shipping the radioactive material indicating that the facility may accept return of the material processed or unprocessed. In addition, for states outside the Southeast Compact the state or appropriate Compact must be a signatory to the Interregional Access Agreement for Waste Management or assurances shall be obtained from the appropriate state governor's office, the state radiation control program, and the appropriate Compact official, if any.

24. The licensee shall establish in every contractual obligation relating to radioactive materials the ability to return radioactive materials, processed or unprocessed, to the prior licensed or exempt possessor.

25. A. Beta and/or gamma sealed sources containing more than 100 microcuries, and alpha sealed sources containing more than 10 microcuries, authorized by this license shall be tested for leakage and/or contamination at intervals not to exceed six (6) months. In the absence of a certificate from a transferor indicating that a test has been made within six (6) months prior to transfer, the sealed source shall not be put into use until tested.

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B. The licensee is authorized to perform leak testing of sealed sources and analytical services for Energy Solutions facilities in accordance with statements, representations, and procedures contained in Tennessee Radioactive Material License Number R-73008.

C. The tests shall be capable of detecting the presence of 0.005 microcurie of radioactive material on the test sample, or in the case of radium, the escape of radon at the rate of 0.001 microcurie per 24 hours. The test sample shall be taken from the sealed source or from the surface of the device in which the sealed source is permanently mounted or stored on which one might expect contamination to accumulate. Records of leak tests shall be kept in units of microcuries and maintained for inspection by the Department.

D. If the test reveals the presence of 0.005 microcurie or more of removable contamination, or in the case of radium, the escape of radon at the rate of 0.001 microcurie or more per 24 hours, the licensee shall immediately withdraw the sealed source from use and shall cause it to be decontaminated and repaired or to be disposed of in accordance with Department regulations. A report shall be filed within five (5) days of the test with the Division of Radiological Health, Tennessee Department of Environment and Conservation, William R. Snodgrass Tennessee Tower, 15th Floor, 312 Rosa L. Parks Avenue, Nashville, Tennessee, 37243, describing the equipment involved, the test results, and the corrective action taken.

26. The licensee shall not open or remove sealed sources containing radioactive material from their respective source holders.

27. The licensee is authorized to receive, possess, and use any radioactive material distributed under a general license, issued by the U. S. Nuclear Regulatory Commission, or another Agreement State, without being specifically referenced in Items 6, 8, 9 and 10 of this license. Notwithstanding any other conditions of this license, the general licensee may possess and use radioactive material received under the provisions of 0400-20-10 of "State Regulations for Protection Against Radiation" in accordance with the requirements provided at the time of the transfer of the radioactive material under the terms of the general license.

28. The following evaluations shall be performed for all process ventilation systems:

    1) Air balance within the RCA at least semi-annually, and following any ventilation system or process changes which could potentially alter the effectiveness of the system,

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF RADIOLOGICAL HEALTH
William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, 15th Floor, Nashville, Tennessee 37243
615-532-0364

RADIOACTIVE MATERIAL LICENSE

Amendment 139

License No. R-73006-L24

Supplementary Sheet

2) Particulate removal efficiency of the main filtration system HEPA filters by DOP or comparable testing in accordance with pertinent ANSI standards immediately following installation of new HEPA filters or at least semi-annually.

29. In addition to other requirements of this license or of Chapter 0400-20-50-.60 of "State Regulations for Protection Against Radiation," the licensee shall conduct operations so that radiation levels in unrestricted areas would not cause an individual, assuming an occupancy of one (1), to receive a total effective dose equivalent in excess of 500 millirems in one calendar year. These radiation levels shall be appropriately monitored by the licensee, and records of such monitoring shall be maintained for inspection by the Department. For calculational purposes of this condition, the licensee shall base its anticipated exposure to a member of the public upon the sum of the maximally exposed TLD and the highest air concentration derived using the latest available pertinent data.

30. No provision of this license relieves the licensee from compliance with other Federal, State, and local laws, ordinances, and regulations applicable to the licensee's activities.

31. Except as specifically provided otherwise by this license, the licensee shall possess and use radioactive material described in Items 6, 8, and 9 of this license in accordance with statements, representations, and procedures contained in the following:
    - Application dated May 29, 2014, with attachments
    - Letters dated June 30, 2014, December 1, 2014, March 3, 2015, with attachments, and March 3, 2015, with attached Energy*Solutions* Tennessee Radiation Safety Guide (RSG-1), Revision 10, April 15, 2015, with attachments, January 29, 2016, with attachments, November 15, 2016, with attachments, and August 3, 2017, with attachments.

Business & Environmental Audit Information

Veolia North America - Flanders, NJ

1 Eden Lane, Flanders, NJ 07836
www.veolianorthamerica.com
800-426-2382

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CORPORATE INFORMATION

Parent Company Name:	*Veolia North America – Headquarters*
Address:	*53 State Street, 14th Floor, Boston, MA 02109*
Telephone:	*+1 617 849 6600*
Website:	*www.veolianorthamerica.com*

Company Ownership:

Veolia ES Technical Solutions, L.L.C. (VESTS) is a division of Veolia North America, which is a wholly owned subsidiary of Veolia.

Federal Identification Number: *36-4287998*

Year Company was established: *1999*

Dunn and Bradstreet Number: *08-218-4156*

National Locations:

TSD Facilities – Flanders, NJ / Creedmoor, NC / Richmond, CA / Menomonee Falls, WI/ Phoenix, AZ / Morrow, GA / Tallahassee, FL

TSDF Fuels Facilities – Middlesex, NJ / Azusa, CA / Henderson, CO / W. Carrollton, OH

TSDF Incinerator Facilities – Sauget, IL / Port Arthur, TX

Other Locations – Veolia (VES) also operates numerous in-transit storage locations and sales/service offices throughout the country.

Veolia Audit Contacts:

John Schantz

New Jersey Branch

Environmental, Health, & Safety Manager

973-691-3923

Kevin Anderson

New Jersey Branch

General Manager

973-691-3922

VEOLIA'S WORLDWIDE AREAS OF EXPERTISE

Veolia designs and implements water, waste and energy management solutions. Together, these three complementary business activities work together to create synergies. We are a partner to cities, for which we are reinventing our approach to traditional markets and to industry, by providing customized solutions covering all requirements, whatever the business sector.

WATER

Veolia treats and monitors **water quality** at all stages of the cycle, from extraction to discharge into the natural environment. We innovate to preserve the resource and promote water recycling and reuse for cities and industry.

100	61	4,052	2,928
million people supplied with drinking water	million inhabitants connected to wastewater systems	water production plants managed	wastewater treatment plants managed

WASTE

Veolia specializes in **waste management**, regardless of whether it is liquid or solid, non-hazardous or special. Our expertise covers the entire waste lifecycle, from collection to recycling and final recovery in the form of materials or energy.

40	45	764,477	591
million people provided with collection services on behalf of municipalities	million metric tons of waste treated	business customers	waste-processing facilities operated

ENERGY

An expert in **energy services**, Veolia supports the economic growth of its municipal and industrial customers while reducing their ecological footprint. Energy efficiency, efficient management of heating and cooling networks, production of green energy - unique expertise for a more sustainable world.

44	37,339	2,086	551
million MWh produced	thermal installations managed	industrial sites managed	heating and cooling networks managed

GENERAL FACILITY INFORMATION

Facility Name:	*Veolia ES Technical Solutions, L.L.C*
Address:	*1 Eden Lane, Flanders, NJ 07836*
Twp./County:	*Mt. Olive Township/Morris County*
Telephone:	*973-347-7111*
EPA ID Number:	*NJD 980 536 593*
SIC/NAICS Code:	*4953/562211*
Property ownership status:	*The site is owned by Veolia North America*
Facility Size:	*37,000 sq. ft.*
Property Size:	*6.01 Acres*
Total active area:	*Approx. 3 acres*
Facility Layout:	*See Attachment #1*
Hours of Operation:	*Monday - Friday, 6:00 am - 10:00 pm*
Number of Employees:	*Approximately 80 at this location*

Branch Management:

Kevin Anderson, General Manager

Paul DeGiulio, Operations/Facility Manager

John Schantz, EH&S Manager

Don Lee, Technical Manager

Site History:

This Veolia facility is located in the North-central portion of New Jersey, about 40 miles due West of New York City. The land was previously undeveloped prior to 1988. The facility began operation at this location on April 3, 1989 as Advanced Environmental Technology Corporation (AETC). Due to a merger in March 1994 AETC became Advanced Environmental Technical Services (AETS). As the result of a sale in June 1999, Onyx Environmental Services (ONYX) was formed. On July 1, 2006 the company changed their name to Veolia ES Technical Solutions (VESTS), now Veolia North America.

Surrounding Area:

Light industrial area. Neighbors consist of a hazardous waste transportation company (north), inactive quarry (west), undeveloped land (south), and office space (east). Landscaped surroundings consists of shrubs and trees.

Proximity to:

- Residences: Approximately 2000 feet - North
- Industrial Buildings: 1000 feet
- Schools: 2-3 miles
- Parks: 3 miles
- Hospitals: 9 miles - Hackettstown Hospital
- Fire Dept: 3 Miles – Budd Lake Volunteer
- Potable Wells: On-site
- Flood Plain: The facility is not located in a flood plain.

- Rivers: 0.5 miles - Wills Brook
- Lakes: Less than 2 miles from Lake Muscanetcong
- Airports: 20 miles - Morristown Airport
  40 miles - Newark International Airport

Population Close to Site:

Population in Netcong (1 mile) = 3250 (2010)

Population in Budd Lake (3 miles) = 9000 (2010)

Security:

The site is surrounded by a six-foot chain link fence and has surveillance cameras. There are "Danger - Unauthorized Personnel - Keep Out" signs posted at each facility entrance. There is no history of problems with unauthorized entry or vandalism.

Site Topography:

A USGS topographic map is available for review.
The facility is not within 200 feet of an active geologic fault.

General Hydro Geologic Setting:

The soil on-site and the surrounding area is classified by the United States Department of Agriculture (USDA) as Rockaway gravelly sandy loam, 8 to 15% slopes.

Prevailing Wind Direction/Speed:

West, 12-13 mph

Community Relations:

Veolia maintains excellent relations with neighbors and the surrounding community.

Veolia participates and assists with several local organizations, including:

- Givaudon Fragrance Community Advisory Panel
- Morris County Infrastructure Advisory Group
- Chemistry Council of New Jersey
- New Jersey Chamber of Commerce
- March of Dimes
- Adopt-A-Highway

Veolia also supports the following local fire and police departments by providing training and supplies as needed:

- Flanders Fire and Rescue
- Budd Lake Fire and Rescue
- Mount Olive Police Department
- Roxbury Police Department

Underground Storage Tanks at the Facility:

In August 1998 two underground heating oil storage tanks were closed and removed. This action was based on a new opportunity to connect to local natural gas utilities and the need for tank upgrades to comply with upcoming NJ DEP regulations. Both tanks proved to be completely intact and no soil remedial actions were necessary.

FACILITY PERMITS

RCRA Part A (EPA ID # NJD 980 536 593):

AETC submitted the initial application in 1987 and a renewal application in 1992. In 1999 the name was changed to Onyx Environmental Services, L.L.C. In 2006 the name was changed to Veolia ES Technical Solutions, L.L.C.

RCRA Part B Application:

The current permit is HWP160001 (Issuance Date: 02/16/2017; Expiration Date: 11/22/2021). The current NJDEP Permit contact is Nick Nader (609) 984-2067.

A copy of current Part B Permit cover page is in Attachment #2.

TSCA Waste Storage:

Veolia is approved as a commercial storer of TSCA waste (PCBs) at the Flanders, NJ facility, however, we are no longer required to have a separate PCB commercial storage approval issued; pursuant to 40 CFR s761.65(d).

CERCLA Waste Acceptance:

Veolia is authorized to accept CERCLA regulated waste streams for storage and transfer to CERCLA authorized treatment and disposal facilities.

Regulated Medical Waste:

Veolia received authorization from NJDEP to operate as a Regulated Medical Waste (RMW) Collection Facility on September 2009. This is approved under a separate permit. Issuance Date: 9/17/09; Expiration Date: 9/17/14. An application for renewal was submitted and is being reviewed by NJDEP. The current permit remains active.

A copy of the RMW Permit cover page is in Attachment #2.

Acceptability of Non-Hazardous Waste for Storage:

Veolia has been issued a permit to accept both hazardous and non-hazardous “solid waste”. Non-hazardous wastes are not required to be shipped on a hazardous waste manifest. For tracking purposes Veolia requires the use of either a hazardous waste manifest or a non-hazardous manifest (BOL) for receiving non-hazardous wastes.

New Jersey Solid Waste Codes accepted by permit:

- ID10 – Household Hazardous Waste
- ID27 – Dry Industrial Waste solids
- ID27A – Asbestos
- ID72 – Non-hazardous Liquid

Maximum Capacity of the Facility:

Currently, the facility can store 3400 - 55 gallon drums or the equivalent volume (187,000 gallons).

Water Permit:

Veolia discharges site storm water under NJPDES General Permit No. NJ0088315, NJPDES #: NJG0065102, PI ID #:49126. This permit presently requires no discharge monitoring. Permit expiration is 1/31/2023. A copy of the permit is in Attachment #3.

Permit for Storage of Flammables:

Veolia has a flammable storage permit (No. 01046) issued by the Mt. Olive Bureau of Fire Protection. This permit is renewed each year.

Discharge Prevention Containment and Countermeasure/Discharge Cleanup and Removal Plan (DPCC/DCR):

As required by N.J.A.C. 7:1E-4.2 + 4.3; Veolia has an approved DPCC/DCR plan (DIFF# 142700341000). The plan was renewed effective on March 16, 2016 and expires on March 16, 2019. A copy of the approval letter is in Attachment #4.

Inspections/Frequency/Contact:

Agency	Frequency	Contact	Phone #
NJDEP-Waste	Quarterly	Maria Petix-Kent	609-439-9645
NJDEP – RMW	Annually	Amy Scaffidi	609-439-9651
NJDEP – Trans	Quarterly	Lawrence Lewis	609-292-6305
EPA-Region II	Annually	John Wilk	212-637-4130
EPA – TSCA	Annually	Vivian Chin	732-906-6179
NJDEP-Water	Annually	Christopher Brindle	973-656-4099
NJDEP-DPCC	Annually	Philip Polios	609-292-1690
Mt. Olive Fire	Annually	Fred Detoro	973-691-0900

Latest Inspection Results:

A copy of the most recent NJDEP inspections are available on request or on the NJDEP website.

WASTE TYPES

Waste Types Handled at the Facility:

- Bulk: liquid, solid, sludge
- Containerized: liquid, solid, sludge, gas

Waste Characteristics Handled at the Facility:

- Corrosive, ignitable, toxic, reactive

Types of Hazardous Materials Handled:

All RCRA codes are acceptable

Chemical	Yes	No	Comments
Organics	X		
Oils	X		
Halogenated Solvents	X		
Non-Halogenated Solvents	X		
Insecticides	X		
Herbicides	X		
Chlorinated Hydrocarbons	X		
Phenols	X		
PCBs	X		
Paint, Pigments	X		
Explosives	X		
Cyanides	X		
Water Reactives	X		
Inorganics:	X		
Acids	X		
Bases	X		
Metals	X		
Sludges:	X		
Metal	X		
Sewage		X	
Radioactive		X*	
Asbestos	X		
Pharmaceutical	X		
Pathological	X		
Lab Packs	X		

* Currently Veolia manages the following waste types: Explosive and Radioactive Waste, through direct transportation of these materials from the customer's location to the ultimate waste management facility.

WASTE ANALYSIS

Waste Identification:

Veolia requires a Waste Information Profile (WIP) (Attachment #5) be completed and certified by the generator prior to waste shipment to the facility. The information regarding waste identification can be from generator knowledge or chemical analysis.

Based on the information provided in the WIP, the wastestream is assigned a DOT proper shipping name, EPA or state waste codes, and an ultimate treatment facility approval code. The WIP is wastestream and generator specific and a unique WIP number is assigned to each wastestream.

If the generator cannot accurately complete the WIP, a sample of the waste will be taken at the generator's facility.

The approval for the management of waste streams at the ultimate treatment facilities must be obtained prior to acceptance of the waste stream at the Flanders Veolia facility.

Written Waste Analysis Plan:

A copy of the Waste Analysis Plan (WAP) section is included in Attachment #6.

The Waste Analysis Plan (WAP) was developed in accordance with 40 CFR s264.13(b) and will be available at the facility at all times. The WAP will be reviewed regularly to ensure compliance with all regulatory standards and standard operating procedures.

The objective of the WAP is to ensure proper classification, transportation and storage of the specific waste as well as safe handling at both Veolia and the ultimate disposal facility. The WAP is designed to perform all waste identification, sampling and analysis at the generator's site prior to transportation and acceptance by the Veolia facility.

WASTE HANDLING

Methods of Waste Treatment and Disposal:

Veolia utilizes a number of off-site facilities for treatment of waste including recycling, wastewater treatment, fuel blending, incineration, and landfill. Veolia can provide assistance to the generator in this selection. A partial list of authorized treatment facilities approved by Veolia is included in Attachment #7.

Additionally, Veolia is permitted to perform the following operations at the Flanders facility:

- Consolidation of Non-Hazardous Liquids into Tank Trucks
- Consolidation of Hazardous Lab Pack Containers into DOT Drums
- Venting of Non-Hazardous Inert Gases
- Pressure Checking of Cylinders

Periodic Environmental Audits of the Off-Site TSDFs Utilized:

Veolia conducts routine environmental audits of all (internal and 3rd party) off-site TSDFs utilized. Information about this program is available on request.

Services Offered by Veolia:

Services include hazardous/non-hazardous waste disposal, lab pack disposal, general field services, empty drum disposal, transportation, emergency spill response, reactives handling, tank cleaning, analytical lab services, and environmental training.

Veolia also manages certain wastes, which are not acceptable for storage at the Flanders facility, by arranging for transportation directly to the disposal site.

Waste Water Management:

There is no wastewater generated as the result of the treatment of waste at this location.

Disposition of Site Generated Waste:

Plant scraps, waste oil (from on-site maintenance of vehicles), batteries, fluorescent lamps, cleaning solution, and aerosol cans, are occasionally generated at the facility. These wastes are classified accordingly and sent for off-site treatment or disposal.

Disposition of Empty Drums:

Empty drums are sent to an authorized facility for drum reconditioning or recycling.

Emissions Controls:

All wastes are stored in containers that remain closed. All Veolia container management operations comply with Subpart CC requirements.

Area in which Wastes are Delivered to the Site:

Materials are off-loaded from straight-bed trucks onto the loading dock. Following a waste acceptance inspection the waste is transferred into a trailer destined for the ultimate treatment facility or into the Shipping/Receiving area, located adjacent to the dock. Waste is typically stored at the facility for 10-14 days before leaving for the ultimate disposal site.

Equipment Utilized to Unload Waste Materials:

Equipment such as pallet jacks, drum trucks, and forklifts are utilized to move the containers. Shrink-wrap is used to secure smaller containers to pallets for safe transportation.

Unloading and Storage Area Containment System:

The loading dock and waste storage areas are provided with secondary containment. Containment consists of bermed concrete pads that are equipped with a trench drain system. The trenches are provided with manually controlled valves. The trench system leads to a containment basin with an impervious concrete base.

Loading and Unloading practices:

All wastes are loaded and unloaded as specified in 49 CFR 177.834 and stored and segregated in accordance with DOT regulations under 49 CFR 177.848.

Labeling, Placarding, Marking, and Packaging System Used:

All containers are packaged, labeled and marked in accordance with 49 CFR.

Container Storage:

Wastes are stored in DOT acceptable containers. Containers are compatible with waste contained within them. Ignitable and reactive wastes are stored at least 50 feet from the facility's property line.

Frequency of Container Storage Area Inspection:

A daily inspection of the containers, storage areas, trailers, trench drains, security and emergency equipment is completed and documented by the Facility Services Manager or Facility Supervisor.

Additionally, the Facility Services Manager completes a monthly inspection of all emergency response equipment.

Volume Handled:

Veolia has managed approximately 30 million pounds of waste through the facility in each of the last 3 years. Generally 60% of the waste is RCRA Hazardous and 40% is Non-Hazardous or Universal Waste.

Approximately 60% of the waste managed at the facility is from New Jersey Branch customers. The additional 40% comes from other Veolia 10-day operations, including: Philadelphia (PA), Albany (NY), Long Island (NY) and Gurabo (PR).

Laboratory Services:

Laboratory services are available upon request. The Flanders facility does not maintain an analytical laboratory. All laboratories utilized are certified by either NJ-ELCP or NELAP.

Waste Tracking System:

Veolia field service personnel, at the customer site, input waste shipment information directly into a laptop computer and a bar code label with a unique container number is placed on each container. Upon arrival at the Flanders facility this data is downloaded into the AS/400 computer tracking system. Individual container numbers and manifest numbers track all containers through the facility to off-site treatment.

Veolia issues Certificates of Tracking (COT's) to clients indicating receipt of material at the ultimate treatment facility. In addition, pertinent documents such as manifests, land bans, COT's, and COD's are kept on file at the facility, indefinitely.

WATER MANAGEMENT

Storm Water:

Run-off controls for Storm Water: All storm water coming into contact with the active portion of the facility is collected in a trench system and containment basin. The release from the containment basin is manually controlled.

Storm water testing methods: The storm water is discharged after visual inspection and verification that no spills have occurred that could have possibly contacted the storm water. Routine testing is presently not required under the General Discharge Storm Water Permit. A copy of the NJDEP General Discharge Permit is in Attachment #3.

Best Management Practices Plan: Veolia has implemented a storm water pollution prevention plan that includes several best management practices and an inspection program. The SWPP Plan is available for review upon request.

Drinking Water:

Veolia is classified as a non-transient, non-community water system.

The drinking water is tested for periodically in accordance with NJDEP regulations for the following (Licensed operator is McGowan Well Water Compliance):

- Coliform Nitrates Nitrites
- Volatile Organic Compounds Lead and Copper
- Inorganics and Secondaries

Groundwater:

The facility is not required to conduct groundwater monitoring. The depth of groundwater is 13 feet on the Veolia property.

The closest groundwater used as a source of drinking water in the area is on the Veolia property.

TRANSPORTATION PRACTICES

Vehicles:

Veolia is a primary provider of hazardous waste transportation services. Veolia New Jersey maintains approximately: 2 tractors, 15 tank trucks, 10 closed trailers, 17 straight trucks, 12 pick-ups, 6 vans and an air induction vehicle, at the Flanders and Middlesex locations.

Veolia is permitted to transport waste in all states serviced by the New Jersey Branch.

Additionally, Veolia uses subcontractors to supplement its fleet. Transporters are approved based on their permits, insurance, and compliance with the motor carrier safety regulations. A partial list of authorized transporters approved by Veolia is in Attachment #9.

Brokerage:

Veolia, as a hazardous waste management company, has the capabilities to manifest waste directly from the client's facility to the ultimate treatment facility. Approved subcontractors are frequently used for these shipments.

Security:

Veolia has developed and implemented a security plan compliant with the requirements of 49 CFR, Part 172, Subpart I. In addition, Veolia's employee training program includes security awareness and in-depth security training as required by 49 CFR s172.704.

A security plan certification letter is available on request.

SAFETY & TRAINING

All accidents and incidents are recorded on an Accident/Incident Investigation Report Form and reviewed by the employee's manager, EH&S Manager and General Manager.

The person responsible for overall safety at the Flanders, NJ location is the Branch Environmental Health & Safety Manager. Additionally, Veolia has a full time Director of Safety.

The following personnel are authorized to conduct accident investigations and job safety inspections:

- Veolia Safety Director
- General Manager
- Operations Manager
- EHS Manager
- Project Managers

Frequency of Job Safety Inspections:

Veolia performs monthly facility inspections and random field safety inspections. These inspections are generally performed by the Facility Services Manager and the Field Project Managers.

Safety meetings:

Project Supervisors hold daily "tailgate" safety meetings to complete site specific Safety Plans and review safety requirements. The Branch Safety Committee holds monthly meetings. The branch also conducts monthly training and safety meetings to review accidents and safety rates.

Training:

All field and facility personnel attend a five-day orientation training program that meets the 40-hour

OSHA training requirements. Additionally there is an annual 8-hour refresher and monthly safety meetings. A complete copy of the training programs can be found in Attachment #10.

OSHA 200 Forms are Posted within the Facility (copies available on request):

	2014	2015	2016	2017
Veolia Flanders OSHA Recordable Rate:	2.21	1.02	2.01	1.01
Veolia Flanders OSHA Lost Time Accident Rate:	0.00	0.00	0.00	0.00
Veolia Flanders OSHA Severity Rate:	0.00	0.00	0.00	0.00

A copy of the 5-year OSHA 200 Log summary can be found in Attachment #11. This summary also includes the Experience Modification Rates (EMR).

PREPAREDNESS & PREVENTION

Written Contingency Plans:

The facility maintains a Contingency Plan and Emergency Procedures as well as a Discharge Prevention Containment and Countermeasures plan approved by the NJDEP. Both plans are available for review upon request. Copies of the contingency plan have been distributed to local authorities in accordance with state and federal regulations.

The facility has also completed a USDOT Security Plan and site vulnerability and risk assessment. All employees have been trained in security awareness and in-depth security training.

Emergency Response:

- Periodic emergency response drills, mock spills and fire drills are conducted at least annually.
- The facility maintains adequate aisle space for equipment access in the event of an emergency; 18-inch aisle space is required in waste storage areas, by the Part B Hazardous Waste Permit.
- The facility maintains an extensive inventory of emergency equipment. An emergency equipment list is contained in the Contingency Plan. Emergency equipment stations are placed throughout the facility.
- Fire extinguishers are placed strategically on the loading dock area and throughout the building.
- The facility has a written inspection policy/procedure including a checklist of items to look for during inspections.

Training:

Veolia has an extensive internal training program including 40-hour OSHA, Hazard Communication, Security, Reactive Chemical, Emergency Response, Confined Space Entry, DOT HM-126F, Lockout/Tagout, Bloodborne Pathogens, Hearing Conservation, Electrical Safety, Forklift Safety, and CPR and First Aid training programs. Summary of classes is available in Attachment #10.

Employee Monitoring:

Employees are given annual performance reviews. In addition, field personnel participate in a comprehensive testing program where they are evaluated in terms of on- the-job performance, knowledge and skills. In order to advance, they must successfully pass the testing program.

COMPLIANCE MANAGEMENT SYSTEMS

Veolia follows a four (4) part approach to assuring compliance with federal, state, and local regulations and company policies. The program is known by its acronym, PACT. A demonstration of these systems can be provided upon request.

Prevention:

Veolia uses an internal Environmental Management System (EMS). This program helps to assure compliance by creating a calendar and monthly task assignment forms related to compliance issues. Tasks include start and due dates, person assigned, and a description of actions required. Once completed, the task is documented on the EMS form.

Assessment:

Veolia utilizes a two-phase audit system to assure consistency and compliance of our facilities nation-wide; Peer Audits and Self Assessments.

Peer Audits of Veolia facilities are conducted by groups composed of Veolia employees assembled from multiple locations. These audits are completed at the Flanders facility every two years.

Self-Assessments are conducted by teams composed of facility and branch employees. The Self-Assessments are completed on various management areas throughout the year, with a goal of 50% of the management areas being completed each year.

Corrective Action:

Veolia uses the software package Dakota - Tracer to track progress related to correcting compliance issues. Issue reports include due dates, root cause analysis, corrective and preventive actions, and person assigned. Tracer issues are transmitted to corporate directors on a monthly basis for review.

Training:

In addition to the training regimen outlined in Attachment #10, the Veolia Flanders facility holds monthly training sessions with all Branch Employees covering compliance, safety, and other policy issues.

INCIDENT HISTORY

Site Spill History:

Veolia has not experienced any spills requiring reporting to the National Response Center.

The last reportable discharge occurred in 1996 when a service vehicle fuel filter leaked and released approximately 10 gallons of diesel fuel onto the asphalt surface. The discharge was reported to NJDEP and remediated per regulatory requirements outlined in the DPCC/DCR Plan.

The facility has never experienced a fire or explosion involving waste materials. There has never been a major incident at the facility where employees were injured requiring medical attention or hospitalization.

Consent Orders:

The facility is not currently under a Consent Decree or Order. There are no corrective actions, remedial actions, or other types of clean-up operations being conducted at the site.

The facility is not currently listed on or considered for listing on the National Priorities List.

Compliance History:

Veolia maintains an excellent compliance history. A complete (five year) summary is available in Attachment #12.

FINANCIAL/INSURANCE INFORMATION

Closure Plan:

Plan includes (A copy is in Attachment #8):

- A description of how and when the facility will be closed.
- A description of the steps necessary to decontaminate facility equipment during closure.
- Anticipated date for final closure: Indefinite
- Closure Cost Estimate:
  $773,170.99 - Adjusted inflation in September 2017

Financial Assurance Mechanism:

Surety Bond – Copies available on request.

Written Post-Closure Plan:

There will be no wastes, residues, or contaminated soils remaining at the site after closure activities are completed. Therefore, no post-closure care will be necessary at the facility.

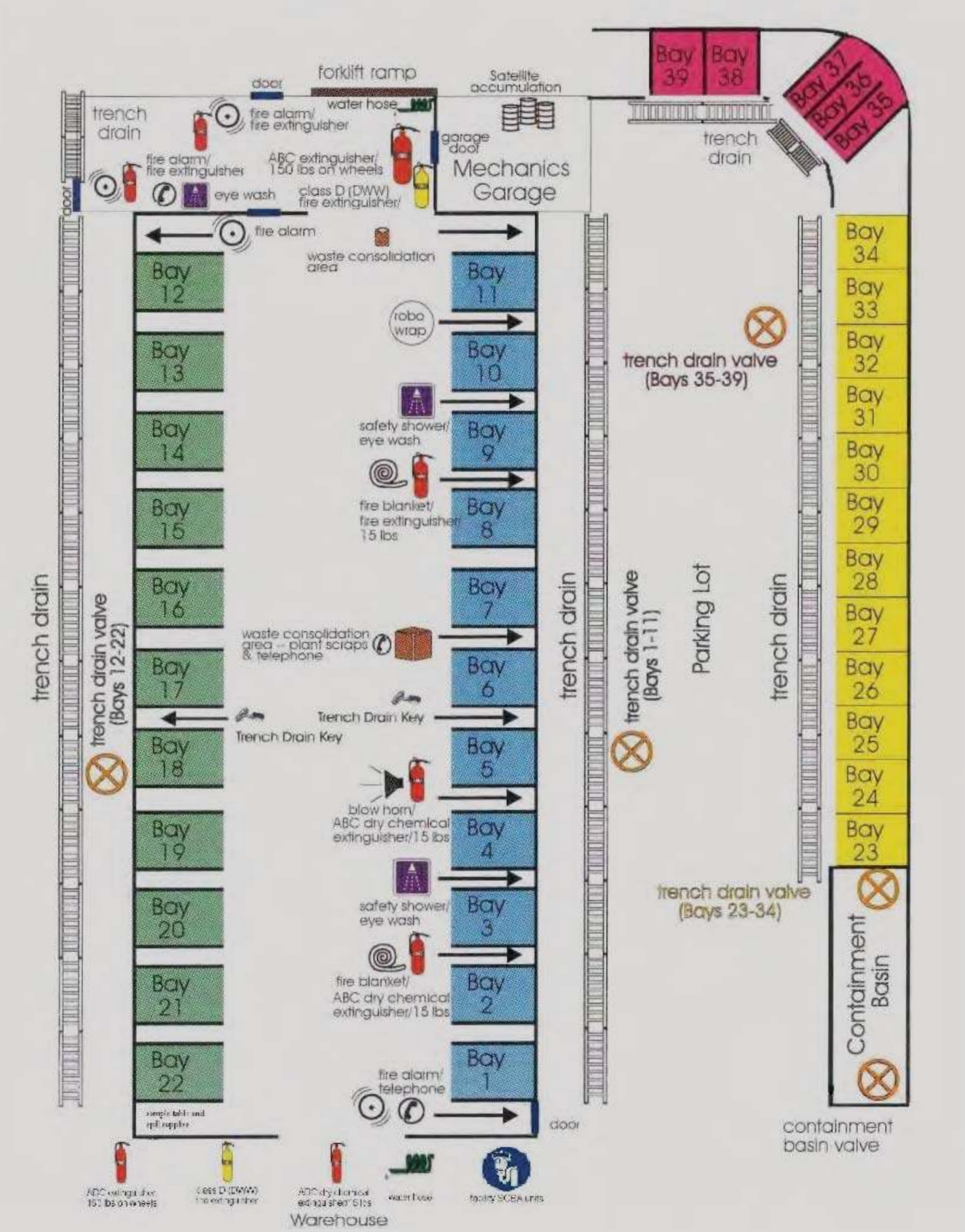
Insurance (a copy is in Attachment #13):

Marsh USA Inc., Houston, TX

- $1MM General Liability
- $5MM Excess Liability
- $15MM pollution legal liability

ATTACHMENTS

New Jersey Flanders Facility Layout



Facility Part B Permit & Regulated Medical Waste Permit Cover Pages

State of New Jersey

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BOB MARTIN
Commissioner

Division of Solid & Hazardous Waste
Bureau of Recycling & Hazardous Waste Management
401 East State Street
P.O. Box 420, Mail Code 401-02C
Trenton, NJ 08625-0420
Tel (609) 984-3438 Fax (609) 777-1951
www.nj.gov/dep/dshw/recycling

Under the provisions of N.J.S.A. 13:1E-1 et seq. known as the Solid Waste Management Act, this permit is hereby issued to:

Veolia ES Technical Solutions, LLC
1 Eden Lane
Flanders, NJ 07836

For the Purpose of Operating a:	Solid and Hazardous Waste Storage and Transfer Facility
Lot & Block Nos:	Lot 37, Block 4500
In the Municipality of:	Mount Olive Township
County:	Morris
Under Facility Permit No.:	HWP160001
EPA ID No.:	NJD980536593

This permit is subject to compliance with all conditions specified herein and all regulations promulgated by the Department of Environmental Protection.

This permit shall not prejudice any claim the State may have to riparian land, nor does it allow the permittee to fill or alter or allow to be filled or altered in any way, lands that are deemed to be riparian, wetlands, stream encroachment areas or flood plains, or that are within the Coastal Area Facility Review Act (CAFRA) zone or are subject to the Pinelands Protection Act of 1979, nor shall it allow the discharge of pollutants to waters of this State without prior acquisition of the necessary grants, permits, or approvals from the Department of Environmental Protection or the U.S. Environmental Protection Agency.

February 16, 2017
Issuance Date

Zafar M. Billah, Acting Chief
Bureau of Recycling and Hazardous Waste Management

November 22, 2021
Expiration Date

Scope of Permit

The conditions of this permit are based on the New Jersey hazardous waste regulations at N.J.A.C. 7:26G and on the permit application submitted by the permittee. N.J.A.C. 7:26G "incorporates by reference" (with limited exception) the Federal hazardous waste regulations found at Parts 124, 260-266, 268 and 270, Title 40 of the Code of Federal Regulations. In order to eliminate confusion, and to clearly describe the precise obligations that are imposed upon the permittee, only the specific Federal regulatory citations are listed in the conditions of this permit. For the applicable State regulatory citations, refer to N.J.A.C. 7:26G.

This permit, along with the referenced permit application documents herein specified, shall constitute the sole Solid and Hazardous Waste Facility Permit for the operation of the facility. Any permit previously issued by the Division of Solid and Hazardous Waste or its predecessor agencies is hereby superseded. The permittee need not comply with the conditions of this permit to the extent and for the duration such non-compliance is authorized by an emergency permit (40 C.F.R. 270.61).

Description of Solid and Hazardous Waste Activities

Veolia ES Technical Solutions, LLC (permittee) is a commercial environmental services company specializing in the classification, packaging and transportation of solid and hazardous waste. The permittee services a variety of industries including research and development, pharmaceutical and biotechnical, general manufacturing, educational institutions, hospitals and government agencies.

This permit authorizes the permittee to operate a solid and hazardous waste storage and transfer facility. The permittee may accept containerized solid and hazardous waste from off-site generators for storage prior to transfer to authorized off-site treatment, storage and disposal facilities. The designated storage areas consist of the shipping/receiving area and thirty-nine (39) trailer parking spaces. The facility has an authorized total storage capacity of one hundred and eighty-seven thousand (187,000) gallons. There is no disposal of solid or hazardous waste at the facility. All wastes received at the facility are shipped off-site in containers to authorized facilities.

The permittee is also authorized to perform the following activities in the designated areas of the facility:

- Pressure check compressed and liquefied gas cylinders to determine if they are empty;
- De-pressurize non-regulated inert and noble gas cylinders; and
- Consolidate small containers of chemically compatible liquids into USDOT approved drums prior to transportation off-site.
- As a transporter of hazardous waste, operates a 10-day transfer facility in accordance with the requirements specified at N.J.A.C. 7:26G-7.4.

Also conducted within the footprint of the Solid and Hazardous Waste Facility, but not within the scope of this permit is the operation of a Regulated Medical Waste Commercial Collection Facility.

Referenced Permit Application Documents

(a) The permittee shall operate the facility, and construct or install associated appurtenances thereto, in accordance with the regulations contained in 40 C.F.R. Parts 260 through 270, the conditions of this permit, and the following permit application documents:

1. Veolia ES Technical Solutions, LLC Permit Renewal Application dated May 19, 2016, signed by John P. Schantz, EHS Manager.

2. The following drawings signed and sealed by New Jersey registered professional engineers:

   (i) Exhibit A dated September 20, 2003 – General Site Plan and Location of Solid and Hazardous Waste Units. signed and sealed by Lauren J. Coman, P.E.

   (ii) Drawing No. 030513, dated September 16, 2003 – General Site and Boundary Survey, Lot 37 Block 4500 Onyx Environmental Services, LLC, signed and sealed by J. Peters Borbas, P.E.

   (iii) Exhibit C dated November 11, 1985 – Site Detail drawings, signed and sealed by William L. Dean, P.E.

3. Supplemental information dated July 20, 2016 and submitted via electronic mail by John P. Schantz, EHS Manager.

4. Certification of Compliance with TSCA exemption for storage and transfer of PCB waste at RCRA facilities in accordance with 40 CFR 761, dated August 8, 2016 and signed by John P. Schantz, EHS Manager.

In case of conflict, the applicable hazardous waste management regulations contained in 40 C.F.R. shall have precedence over the conditions of this permit, and the conditions of this permit shall have precedence over the Part B permit application documents referenced above.

Appendices

Appendix I: Permit Requirements – Veolia ES Technical Solutions, LLC., EPA ID No. NJD980536593, Hazardous Waste Facility Permit No. HWP160001

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF SOLID & HAZARDOUS WASTE
BUREAU OF LANDFILL AND HAZARDOUS WASTE PERMITTING
P.O. BOX 414 401 EAST STATE STREET
TRENTON, NEW JERSEY 08625-0414
TELEPHONE: (609) 984-6985 TELECOPIER: (609) 633-9839
HTTP://WWW.STATE.NJ.US/DEP/DSHW

JON S. CORZINE
Governor

MARK N. MAURIELLO
Acting Commissioner

LETTER OF AUTHORIZATION TO OPERATE A REGULATED MEDICAL WASTE (RMW) COLLECTION FACILITY

Under the provisions of N.J.S.A. 13:1E-1 *et seq.* and N.J.S.A. 13:1E-99.11 *et seq.*, known as the Solid Waste Management Act, and pursuant to N.J.A.C. 7:26-1 *et seq.*, known as the Solid Waste Regulations, this Authorization is hereby issued to:

VEOLIA ES TECHNICAL SOLUTIONS, LLC

Facility Type:	RMW Collection Facility
Lot No.:	37
Block No.:	4500
Municipality:	Mount Olive Township
County:	Morris
Facility ID No.:	494362
Permit No.:	RMC090001

This Authorization is subject to compliance with all conditions specified herein and all regulations promulgated by the Department of Environmental Protection (Department), or as may be amended in the future. All references to specific regulations include any future amendments thereof.

This Authorization shall not prejudice any claim the State may have to riparian land nor does it allow the registrant to fill or alter, or allow to be filled or altered, in any way, lands that are deemed to be riparian, wetlands, stream encroachment or flood plains, or within the Coastal Area Facility Review Act (CAFRA) zone or are subject to the Pinelands Protection Act of 1979, nor shall it allow the discharge of pollutants to waters of this State without first acquiring the necessary grants, permits, or approvals from the Department or the U.S. Environmental Protection Agency.

September 17, 2009
Issuance Date

Robert M. Confer, Chief
Bureau of Landfill and
Hazardous Waste Permitting

September 17, 2014
Expiration Date

Approved Letter of Authorization and Associated Documents

The owner/operator shall comply with N.J.A.C. 7:26-1 *et seq.*, the conditions of this Approval, and the following documents:

a. Regulated Medical Waste Permit Application – Collection Facility for Veolia ES Technical Solutions, LLC, dated April 14, 2009.

b. NJDEP DPCC General Site Plan, Revised September 9, 2009, signed and sealed by J. Peter Borbas, P.P. License No. 3884.

In case of conflict, the provisions of N.J.A.C. 7:26-1 *et seq.* shall have precedence over the conditions of this Approval, and the conditions of this Approval shall have precedence over plans and specifications listed above.

NJPDES Storm Water Permit

New Jersey Department of Environmental Protection

NEW JERSEY POLLUTANT DISCHARGE ELIMINATION SYSTEM

The New Jersey Department of Environmental Protection hereby grants you a NJPDES permit for the facility/activity named in this document. This permit is the regulatory mechanism used by the Department to help ensure your discharge will not harm the environment. By complying with the terms and conditions specified, you are assuming an important role in protecting New Jersey's valuable water resources. Your acceptance of this permit is an agreement to conform with all of its provisions when constructing, installing, modifying, or operating any facility for the collection, treatment, or discharge of pollutants to waters of the state. If you have any questions about this document, please feel free to contact the Department representative listed in the permit cover letter. Your cooperation in helping us protect and safeguard our state's environment is appreciated.

Permit Number: NJ0088315

Basic Industrial Stormwater General Permit Renewal

Permittee:
NJPDES Master General Permit Program Interest
Category 5G2
Per Individual Notice of Authorization
Division of Water Quality
401-02B; P.O. Box 420
401 East State Street
Trenton, NJ 08625

Co-Permittee:

Property Owner:
NJPDES Master General Permit Program Interest
Category 5G2
Per Individual Notice of Authorization
Division of Water Quality
401-02B; P.O. Box 420
401 East State Street
Trenton, NJ 08625

Location Of Activity:
NJPDES Master General Permit Program Interest
Category 5G2
Per Individual Notice of Authorization
Division of Water Quality
401-02B; P.O. Box 420
401 East State Street
Trenton, NJ 08625

Authorization(s) Covered Under This Approval	Issuance Date	Effective Date	Expiration Date
Basic Industrial Stormwater General Permit – NJ0088315 (5G2)	12/24/2018	02/01/2018	01/31/2023

By Authority of:
Commissioner's Office

DEP AUTHORIZATION
Eleanor Krukowski, Supervisor
Bureau of Nonpoint Pollution Control
Water Pollution Management Element

(Terms, conditions and provisions attached hereto)

State of New Jersey

CHRIS CHRISTIE
Governor
KIM GUADAGNO
Lt. Governor

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Mail Code - 401-02B
Division of Water Quality -Bureau of Nonpoint Pollution Control
P.O. Box 420 – 401 E. State St.
Trenton, NJ 08625-0420
Tel: (609) 633-7021 / Fax: (609) 777-0432
http://www.state.nj.us/dep/dwq/bnpc_home.htm

BOB MARTIN
Commissioner

January 11, 2013

JOHN SCHANTZ
VEOLIA ES TECHNICAL SOLUTIONS LLC
1 EDEN LN
FLANDERS, NJ 07836-0818

Re: 5G2 -Basic Industrial Stormwater GP - NJ0088315 (5G2)
NJPDES: NJG0065102 PI ID #: 49126
VEOLIA ES TECHNICAL SOLUTIONS LLC
Mount Olive Twp, Morris

Dear John Schantz:

The **final** renewal of the Basic Industrial Stormwater General Permit (general permit) identified above has been issued in accordance with N.J.A.C. 7:14A. A complete copy of the general permit, which is effective February 1, 2013 and expires on January 31, 2018, can be viewed on the internet at www.state.nj.us/dep/dwq/ under "Featured Topics".

During the public comment period, comments on the draft action were received from the Delaware Riverkeeper Network. A summary of the significant and relevant comments received and the Department's responses have been included in the Response to Comments document prepared pursuant to N.J.A.C. 7:14A-15.16. No changes from the draft action were made in response to the submitted comments. Pursuant to N.J.A.C. 7:14A-15.15, the Response to Comments document was sent to each person who submitted written comments, along with notice of the Department's decision to issue the final renewal general permit.

If you have questions or comments regarding the Final general permit action, please contact Kerri Standowski at Kerri.Standowski@dep.state.nj.us or (609) 633-7021.

Sincerely,

Brian McLendon, Supervisor
Bureau of Nonpoint Pollution Control
Water Pollution Management Element

Enclosures: (3)

1. Authorization to Discharge
2. Final NJPDES Basic Industrial Stormwater General Permit No. NJ0088315
3. 5G2 Certification Form

E-closures: (2)

1. Basic Industrial Stormwater General Permit Guidance Document at www.state.nj.us/dep/dwq/5g2.htm
2. Basic Industrial Stormwater General Permit Guidance Document – Marina Edition at www.state.nj.us/dep/dwq/5g2.htm

DPCC/DCR Plan Approval Letter

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF RELEASE PREVENTION
P.O. Box 420, Mail Code 22-03D
401 East State Street
Trenton, New Jersey 08625-0420
TELEPHONE (609) 633-0610 FAX (609) 633-7031

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

BOB MARTIN
Commissioner

CERTIFIED MAIL
7013 0600 0001 4506 4193

November 22, 2016

John Schantz
Environmental, Health & Safety Manager
Veolia Environmental Services
1 Eden Lane
Flanders, NJ 07836

Re: Discharge Prevention, Containment and Countermeasure (DPCC) and Discharge Cleanup and Removal (DCR) Plans **Renewal Approval** for Veolia ES Technical Solutions, Mount Olive Township, Morris County

DIFF # 142700341000

Dear Mr. Schantz:

The Bureau of Release Prevention (bureau) is pleased to inform you of the approval of the DPCC/DCR Plan renewal for Veolia ES Technical Solutions. A copy of the current DPCC/DCR plan must be readily available on site at all times.

The approved DPCC/DCR plan will be effective for a period of three years from March 16, 2016. Your renewal request must be submitted to the bureau at least 180 days prior to the end of this three-year period.

Your facility will be inspected to verify compliance with the approved DPCC/DCR plan and N.J.A.C. 7:1E-1 *et seq*. Information concerning the inspection process can be found on our website at http://www.nj.gov/dep/enforcement/dp/dpdown.htm. The results of completed inspections can be viewed by going to http://www.nj.gov/dep/opra/online.html and using your DIFF number above as the Program Interest ID number.

If there are to be any changes at the facility which will affect the approved DPCC/DCR plan, then a notification, amendment, or revision must be submitted in accordance with N.J.A.C. 7:1E-4.8.

Approval of the DPCC/DCR plan does not relieve facility personnel from the discharge notification, response and reporting requirements of N.J.A.C. 7:1E-5. If you have a discharge,

you must notify the department at (877) WARN DEP (877-927-6337) within fifteen minutes. A written discharge confirmation report is required within 30 days. Exceptions to these reporting requirements are listed in N.J.A.C. 7:1E-5.3(e).

Failure to comply with any aspect of the approved DPCC/DCR plan or of the regulations may result in the assessment of civil administrative penalties and the revocation of this approval.

Should you have any questions regarding your DPCC/DCR plan, please contact Philip Polios at (609) 984-7966.

Respectfully,

Iclal Atay, Ph.D., Manager
Bureau of Release Prevention

c: Beth S. Reddy, C.H.M.M., Chief, DPHS Section
Philip Polios, Chemical Safety Engineer

Waste Information Profile (WIP)

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Disposal Code

|__| Recertification

__ Veolia ES Location NEW JERSEY BRANCH FLANDERS NJ |001 | 005 |
|__| Invoice Address OFFICE CITY ST

Veolia ES TSDF requested ____ Technology requested _____ Generator No. 341500 Generator EPA ID No. NJD980536593

1. Generator Name VEOLIA ES TECHNICAL SOLUTIONS Generator State No. _____
Address L.L.C. 1 EDEN LANE State Wastestream No. _____
City FLANDERS State NJ Country US ZIP 07836 ___
NAICS(SIC) Code 4953 _____ _____ _____ Source G33 Origin 1 Form W801 System Type _____

---

2. Waste Name FLAMMABLE AEROSOL PAINT CANS Lab or Waste Area _____
3. Process Generating Waste
used aerosol cans from drum maintenance
4. Shipping Name WASTE AEROSOLS, FLAMMABLE,(EACH NOT EXCEEDING 1L CAPACITY)
Hazard Class 2.1 UN/NA No. UN1950 PG ___ RQ amt 100 lb Waste: Y PIH: N IH: N DWW: N P: N
RQ Des: 1. _____ 2. _____
DOT Des: 1. _____ 2. _____
5. Waste Codes D001 _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____
Wastewater _____ Non Wastewater X Sub Category D001-IG Mix: N Sol: N

---

6. Physical and chemical properties:

pH	Specific Gravity	Flash Point(F)	Solids	
a ___ < 2	a ___ <.8	a ___ < 80	0 - 0% suspended	60 - 80 % ash
b ___ 2 - 5	b X .8 - 1.0	b X 80 - 100	0 - 0% settleable	0 - 0 % water solubili
c X 5 - 9	c ___ 1.0	c ___ 100 - 140	0 - 0% dissolved	0 - 0 BTU/lb
d ___ 9 - 12.5	d ___ 1.0 - 1.2	d ___ 140 - 200		
e ___ > 12.5	e ___ > 1.2	e ___ > 200		Free Liquid 0 - 0 %
_____ exact	_____ exact	f ___ no flash _____ exact		VOC 0 - 0 %

Physical State

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

Hazardous Characteristics

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

Odor

a none X
b mild ___
c strong ___
describe _____

Halogens

Br .0 - .0 % Bromine
Cl .0 - .0 % Chlorine
F .0 - .0 % Fluorine
I .0 - .0 % Iodine

Layers: | a ___ multilayered: b ___ bi-layered: c ___ single phase |

	Top Layer	Second Layer	Bottom Layer	Color
Viscosity by Layer:	___ high(syrup)	___ high(syrup)	___ high(syrup)	VAR
	___ medium(oil)	___ medium(oil)	___ medium(oil)	___
	___ low(water)	___ low(water)	___ low(water)	_____
	___ solid	___ solid	___ solid	

WIP NO. 16149

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Used oil y/n N HOC < 1000 ppm ___ HOC > 1000 ppm ___

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

Constituents	Ranges	Units
AEROSOL PAINT CANS CONTAINING PROPANE, ISOBUTANE	100.00 | 100.00	%

Other:

8. Is the wastestream being imported into the USA? Yes __ No X
9. Does the wastestream contain PCBs regulated by 40CFR? Yes __ No X
   PCB Concentration .00 ppm
10. Is the wastestream subject to the Marine Pollutant Regulations? Yes __ No X
11. Is the wastestream from an industry regulated under Benzene NESHAP? Yes __ No X
   If yes:
   Is the wastestream subject to Notification/Control Requirements? Yes __ No X
   Benzene Concentration .00 ppm
   Does it contain >= 10% water? Yes __ No X
   What is the TAB at your facility? .00 Mg/Yr
12. Is the wastestream subject to RCRA subpart CC controls? Yes X No __
   Volatile Organic Concentration 100.00 ppmw
   CC Approved Analytical Method? Yes __ No X
   Generator Knowledge? Yes X No __
13. Is the wastestream from a CERCLA or state mandated cleanup? Yes __ No X

14. Container Information :

Packaging: _____ Type/Size: __ _____
_____ Type/Size: __ _____

Shipping Frequency: Units 100.00 Per Day _ Per Week _ Per Month _ Per Qtr _ Per Year X One Time _
UOM DRUMS DESCRIPTION: _____

15. Additional Information :

16. Product Reclaim

Does Generator want material back (TOLL)? Yes _ No _
If Yes, what is the Generator's product specification?

Constituents	Range	Units

APHA Color ___ Other _____
Is the waste: grain _ or synthetic _ Ethanol? SDA Formula N o._____
Have TTB taxes been paid on the contained ethanol and eligible for rebate? ___
Transportation Provided By: _ Veolia _ Generator _ Other
Returned in: _ Bulk (_ T/T _ T/C _ ISO) _ Drums _ Other

VIP NO. 16149

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Describe the application for the solvent:

Additional Information:

GENERATOR CERTIFICATION

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

Name(Print or Type)	Phone	Date

Signature	Title
Signature on File	

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

WIP NO. 16149

SECTION 3
Waste Analysis Plan
{40 CFR s270.14(b)(3)}

3.1 Waste Analysis Plan (WAP)

The Veolia Waste Analysis Plan (WAP) was developed in accordance with 40 CFR s264.13(b) and will be available at the facility at all times. The WAP will be reviewed regularly to ensure compliance with all regulatory standards and standard operating procedures. The objective of Veolia's WAP is to ensure proper classification, transportation and storage of the specific waste, as well as, safe handling at both Veolia and the ultimate disposal facility. The WAP is designed to perform all waste identification, sampling and analysis at the generator's site prior to transportation and acceptance by the Veolia facility.

Prior to acceptance at the Veolia facility, all wastes will be assigned an approval code indicating that the waste has been approved for treatment/disposal at the ultimate destination facility, or approved for processing by at the Veolia facility in accordance with their Part B Permit. The Veolia WAP is separated into two parts based on the container types commonly encountered at the facility. The container types are: (1) Laboratory Packaged Chemical Wastes (Lab Packs), and (2) Bulk and Non-Bulk Wastestreams.

3.2 Laboratory Packaged Chemicals (Lab Packs)

Lab packs are DOT combination packages holding inside containers of waste chemicals, chemical compounds and samples. Enough absorbent material is placed in each outside container to resist shock and to absorb the liquid contents in the unlikely event of inner container damage during handling, storage and transportation. All lab packs will be either packaged or reviewed for quality control by Veolia trained personnel prior to acceptance. The majority of the lab pack chemical waste is in the original container with the original manufacturer's label. If the manufacturer's label is not on the container, Veolia will require that the generator analyze or positively identify the material before it can be removed from the generator's site.

Veolia has developed training and standard operating procedures for identification or characterization, segregation, packaging, and transportation of lab pack chemicals. These procedures have been developed to provide the generator and disposal site with the maximum assurance that the waste is packaged to comply with all applicable regulations and to assure that no chemical compatibility problems occur.

Packaging is completed at the generator's site, in accordance with all USEPA and USDOT regulations, as well as, Veolia's confidential chemical compatibility segregation grouping system **(Attachment 3)**. In order for two chemicals to be placed in the same outer package, the chemicals must be in the same DOT Hazard Class and the same Veolia chemical compatibility group. This ensures that individual chemical containers packaged in the same outer package are completely compatible. In addition, each lab pack container will be marked and labeled in accordance with all EPA and DOT requirements.

Upon arrival at the facility, Veolia personnel inspect all containers to insure that the packaging and labeling has been prepared in accordance with DOT regulations. Lab Packs holding hazardous wastes may be repacked while in storage at the Veolia facility for one of the following reasons:

1. Corrective action is required.
2. Containers are required to be repackaged due to a change in the ultimate treatment/disposal facility requirements.
3. Inner contents of several lab pack containers of compatible material are to be repacked into larger containers.

3.3 Bulk and Non-Bulk Wastestreams

Initial Review and Waste Identification:

Wastestreams are not accepted at the facility until a Waste Information Profile (WIP) is completed and approved by Veolia technical representatives. Completion of the WIP ensures that the wastes are properly classified, packaged and directed to an approved ultimate disposal facility.

The waste analysis process begins with an interview between a Veolia representative and an authorized person at the generator's facility. During the interview, the generator's site, wastes and processes will be reviewed in detail to identify possible waste types and characteristics. Furthermore, the process review will identify all raw materials used in the operations in order to identify all hazardous constituents likely to be present in any generated waste.

Utilizing the information gathered during the interview, the generator is required to complete and certify a WIP for each unique wastestream **(Attachment 2**). Veolia trained personnel may assist the generator in completing the WIP. The generator will use knowledge of the waste (Generator Knowledge), materials and processes used, and analytical results (if necessary) to complete all necessary WIP parameters.

Based on the information provided in the WIP, the wastestream is assigned a DOT proper shipping name, EPA or state waste codes, and an ultimate treatment facility approval code. The WIP is wastestream and generator specific and a unique WIP number is assigned to each wastestream. If the generator cannot accurately complete the WIP, a sample of the waste will be taken at the generator's facility. All sampling and analysis shall be performed in accordance with the Quality Assurance/Quality Control methods established by the Department and sent to a state certified laboratory.

Waste Approval Process:

The WIP, MSDS if available, and any analytical results are reviewed by the Veolia technical representatives. The review ensures that the waste materials are acceptable under the facility's operating permit. In addition, ultimate treatment/disposal options are determined based on the WIP and land disposal restriction regulations.

If a Veolia approval for treatment at an ultimate treatment/disposal facility already exists, the field service technicians are authorized to transport the wastestream from the generator's facility to the Veolia facility. These existing approvals are referred to as generic disposal approval codes. Veolia maintains as extensive database of generic disposal approval codes to streamline the approval process and allow for the efficient management of customers' wastes.

However, should an approval for treatment at an ultimate treatment/disposal facility not exist, then one will be obtained by Veolia on behalf of the generator. Information from the WIP, along with treatment/disposal facility approval paperwork (and a sample if necessary), will be forwarded to the ultimate treatment/disposal facility for review and approval. Once the approval is issued, an approval code is assigned to that specific wastestream and the waste can be transported from the generator's site to the Veolia facility. The approval code can then be used for future shipments of that same wastestream.

Waste Screening Process

The waste analysis process continues during the preparation of the materials at the generator's site. Veolia trained field personnel will conduct a visual inspection of the wastes, containers, and labels to ensure that the wastes are consistent with the information outlined on the WIP. If any discrepancy exists, the materials will not be removed from the generator's site.

Wastestream Re-evaluation

A re-evaluation of the WIP information and the designated treatment approval for the waste will be conducted under the following circumstances:

1. The generator modifies the process or operation generating the waste.
2. Veolia field operations or the ultimate disposal facility determine that the waste does not conform to the WIP.
3. There is a regulatory revision that affects the classification or appropriate management of the waste for disposal.

All active WIPs will be periodically reviewed for accuracy.

All WIPs and approvals are entered into the Veolia computer database. This allows for easy review of both the WIP and the treatment approval information. In addition, the database maintains an electronic "stamp" that documents the initial date of entry, the date of the last revision, and the username of the person making the modifications to the WIP information.

3.4 Operating Record

A complete written operating record is maintained at the facility as required under 40 CFR s264.73(b). The information is recorded as it becomes available, and will be maintained until closure of the facility; or if noted below, no less than 3-years. The operating record includes:

- A description and the quantity of each solid and hazardous waste received, and the method and date of its treatment or disposal.
- The location of each solid and hazardous waste within the facility, and the quantity at each location.
- Records and results of waste analysis and waste determinations (no less than 3-years).
- Summary reports and details of all incidents that require implementation of the contingency plan (no less than 3-years).
- Records and results of all required inspections (no less than 3-years).
- All closure cost estimates.
- Waste minimization plan and certification.

3.5 Reporting Requirements

The following reports are completed and submitted as required by regulation:

- Manifest Discrepancy Reports – Completed and submitted for significant discrepancies not resolved within fifteen days.
- Unmanifested Waste Reports – Completed and submitted within 15 days for receipt of unmanifested waste.
- Biennial Reports – Completed and submitted covering facility activities during odd numbered calendar years.
- Solid Waste Monthly Reports – Completed and submitted monthly summarizing the solid waste received by the facility.
- Exception Reports – Completed and submitted for exported waste that is returned to Veolia.

Veolia ES Technical Solutions, L.L.C. - Audited and Approved Facility List

Facility Name	Facility Address	EPA ID Number
Alaron Corporation	PA State Route 18 & Park Street, Wampum, PA 16157	PAD987400157
Bethlehem Apparatus Co., Inc.	890 Front Street P.O. Box Y, Hellertown, PA 18055	PAD002390961
Bethlehem Apparatus Co., Inc.	935 Bethlehem Drive, Bethlehem, PA 18017	PA0000453084
Chemical Waste Management	P.O. Box 55, Highway 17N Milemarker 163, Emelle, AL 35459	ALD000622464
Clean Earth of North Jersey	115 Jacobus Ave, South Kearny, NJ 07032	NOT REQ
Clean Earth of Philadelphia, Inc	3201 South 61st. Street, Philadelphia, PA 19153	NOT REQ
Clean Harbors Environmental Services	309 American Circle, El Dorado, AR 71730	ARD069748192
Clean Harbors of Baltimore, Inc.	1910 Russell Street, Baltimore, MD 21230	MDD980555189
Clean Water of New York	3249 Richmond Terr., Staten Island, NY 10303	NY0000968545
Covanta Niagara	100 Energy Blvd. @ 56th Street, Niagara Falls, NY 14304	NOT REQ
Covanta Union, Inc.	1499 Route 1 North, Rahway, NJ 07065	NOT REQ
CWM Chemical Services, L.L.C.	1550 Balmer Road, Model City, NY 14107	NYD049836679
Environmental Recovery Corp.	1076 Old Manheim Pike, Lancaster, PA 17601	PAD987266749
EQ Michigan Disposal Inc.	49350 N I-94 Service Drive, Belleville, MI 48111	MID000724831
Giant Cement Company GRR - Harleyville, Inc.	654 Judge Street P.O. Box 352, Harleyville, SC 29448	SCD003351699

Facility Name	Facility Address	EPA ID Number
Giant Resource Recovery - Attallia, Inc.	1229 Valley Drive Highway 11, Attalla, AL 35954	ALD 070 513 767
Lancaster County Resource Recovery	1911 River Road Route 441 Southside, Bainbridge, PA 17502	PA0000103713
SET Environmental, Inc.	5743 Cheswood, Houston, TX 77087	TXD055135388
Veolia Environmental Services Trade Waste Incineration, Inc.	7 Mobile Avenue, Sauget, IL 62201-1069	ILD098642424
Veolia Environmental Services	4301 Infirmary Road, West Carrollton, OH 45449	OHD093945293
Veolia Environmental Services	W124 N9451 Boundary Rd., Menomonee Falls, WI 53051	WID003967148
Veolia Environmental Services	9131 East 96th Avenue, Henderson, CO 80640	COD980591184
Veolia Environmental Services	Highway 73 , Port Arthur, TX 77640	TXD000838896
Veolia Environmental Services	5752 West Jefferson Street, Phoenix , AZ 85043	AZ0000337360
Veolia Environmental Services	1275 Mineral Springs Drive, Port Washington, WI 53074	WID988566543
Veolia Environmental Services	230 Canton Street, West Bridgewater, MA 02072	MA5000004713
Vexor Technology, Inc.	955 West Smith Road, Medina, OH 44256	OHD077772895

SECTION 13
Closure Plan & Closure Cost Estimate
{40 CFR s270.14(b)(13) & (15)}

13.1 Introduction

This written closure plan has been prepared in accordance with 40CFR s264.110 for the Veolia Eden Lane facility. The Veolia operation involves the temporary storage of containerized wastes for a short period of time prior to the shipment off-site to an authorized facility for ultimate treatment or disposal.

There are no treatment or disposal activities conducted at this Veolia facility.

13.2 Closure Procedures

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

1. Notification to the NJDEP of the intent to close the facility.

2. Cessation of the acceptance of waste (both hazardous and non-hazardous) by redirection to other authorized disposal facilities.

3. Transportation of the inventory of waste materials in storage to pre-selected disposal facilities.

4. Inspection of the waste storage areas and containment system for evidence of spills. Specific areas to be inspected include the shipping/receiving area, all concrete containment pads, the loading dock, all trench drains, and the containment basin. If no visual contamination is evident, these areas will be pressure-washed. The wash water will be collected, sampled, analyzed and disposed of in accordance with applicable regulations.

   If visual signs of contamination are evident, samples of the contaminated areas will be taken and analyzed for proper classification. All areas confirmed by analytical testing to be contaminated will be removed, containerized, and transported off-site for appropriate disposal in accordance with applicable regulations.

5. Inspection of all storage trailers remaining on-site. Each trailer will be pressure- washed. The wash water will be collected and analyzed to determine if any contamination exists. This cleaning procedure will be repeated until such time as the results of the analytical testing indicate that the trailers are clean. The wash water will be disposed of in accordance with all applicable regulations.

6. Removal of all trailers, trucks, equipment, drums and other supplies from the property.

7. Removal of all permanently mounted warning signs.

8. Submission of appropriate certification of closure activities to the NJDEP.

13.3 Maximum Inventory

The maximum inventory of waste to be stored at this location is 3400 55-gallon drums, or the volumetric equivalent stored in other sized DOT approved containers. There will be no treatment or disposal activities conducted at this facility.

The typical storage volume at this facility is 2200 – 2500 drums. However, in order to address the worst case scenario, the maximum permitted storage volume will be used for the closure cost estimate.

13.4 Post-Closure Care

There will be no waste, residues, or contaminated soils remaining at the site after closure activities are completed. Therefore, no post-closure care will be necessary at the facility.

13.5 Final Closure Schedule

It is anticipated that operations at the facility will continue indefinitely, however, for purposes of this plan, January 2030 has been selected as the date when NJDEP will be notified that the facility will be closed. The hazardous waste management units at this location include 39 trailer pads, the loading dock, and the shipping/receiving area. The following is a schedule for closure of these units:

Activity	Date
Notification of NJDEP that the facility will be closed.	January 2030
Receipt of final volume of waste.	July 2030
Commencement of closure.	August 2030
Removal of final volume of waste from the facility.	October 2030
Completion of inspection of concrete, pressure-washing of all surfaces, sampling and analysis.	November 2030
Submission of appropriate certifications to NJDEP	January 2031

The total time for closure activities has been estimated at one hundred and eighty (180) days with the first ninety (90) days used primarily for the removal of inventory from the site.

Based upon our past experiences managing the facility, it is anticipated that the actual time needed for the removal of inventory would actually be less than thirty (30) days. Therefore, the facility does not foresee any problems complying with the established timeframes.

13.6 Closure Cost Estimate

The closure cost estimate for the Veolia Eden Lane facility has been prepared based on the worst case volume scenario. As a result, the estimate is based on the maximum storage at the facility which is 3400 55-gallon drums (or drum equivalents). ***This is based on the original Closure Plan approved in 2006, adjusted for inflation through September 2010:***

Activity	Cost
Disposal costs for remaining waste inventory. (Note #1)	$438,770.00
Transportation costs for remaining waste inventory. (Note #2)	$52,870.00
Pressure-washing of all storage areas and containment system. This includes sampling, analytical, transportation and disposal of wash water. (Note #3)	$8,770.00
Additional sampling and analytical as needed. (Note #4)	$6,000.00
Independent professional engineer certification.	$2,500.00
Sub-Total	$508,910.00
Contractor's fee: 10%	$50,891.00
Contingency costs: 10%	$50,891.00
TOTAL CLOSURE COST	$610,692.00

NOTES:

1. Based on actual 2010 percent of waste managed through the facility to the following treatment options, and average third party cost per pound for disposal. All disposal cost calculated at 400 pounds per drum, 3400 total drums:
    - Incineration – 36% (1224 drums x $224.00 per drum = $274,176.00)
    - Fuel Blending – 31% (1054 drums x $65.00 per drum = $68,510.00)
    - Water Treatment – 15% (510 drums x $112.00 per drum = $57,120.00)
    - Landfill – 10% (340 drums x $45.00 per drum = $15,300.00)
    - Recycling – 8% (272 drums x $87.00 per drum = $23,664.00)
2. Based on actual transportation costs of full trailers to current third party disposal sites as follows:
    - Incineration – 1224 drums x $21.00 per drum = $25,704.00
    - Fuel Blending - 1054 drums x $10.00 per drum = $10,540.00
    - Water Treatment – 510 drums x $13.00 per drum = $6,630.00
    - Landfill – 340 drums x $15.00 per drum = $5,100.00
    - Recycling – 272 drums x $18.00 per drum = $4,896.00
3. Costs to pressure-wash 30,000 sq./ft of concrete surfaces, trench drains, containment basin and trailers (total wash water = 6000 gallons):
    - Pressure washing equipment and supplies - $25.00 per hour x 20 hours = $500.00
    - Manpower and PPE (two men in Level D PPE) - $160.00 per hour x 20 hours = $3,200.00
    - Analytical (full TCLP, PCB, Organics) - $785.00 per sample x 2 samples = $1570.00
    - Transportation and disposal (two bulk shipments of waste water) = $3,500.00
4. Based on Ten (10) full TCLP samples at $600.00 each.

Current Closure Cost (adjusted through September 2010) = $692,632.65

13.7 Financial Mechanism

The financial assurance mechanism established for the closure of the facility is a Surety Bond (Bond No. 5005340) guaranteeing payment into a closure trust fund **(Attachment 24)**. The 2010 RIDER lists the new closure amount at $692,632.65.

13.8 Closure Cost Adjustments

The closure cost estimate will be adjusted for inflation within sixty (60) days prior to the anniversary date of the establishment of the financial instrument used to comply with 40 CFR s264.143.

The adjustment for inflation will be made by recalculating the maximum costs of closure using an inflation factor derived from the most recent Implicit Price Deflator for Gross National Product published by the U.S. Department of Commerce.

Authorized Transporter List

(Partial list of transporters commonly used by the New Jersey Branch)

EPA ID Number	Name	Address	Phone
NJD000692061	Environmental Transport Group Inc.	Goldmine Road Flanders, NJ 07836	973-347-8200
NJD054126164	Freehold Cartage Inc	825 Highway 33 East Freehold, NJ 07728	732-462-1001
NYD980769947	Hazmat Environmental Group Inc	60 Commerce Drive Buffalo, NY 14218	716-827-7200
OHD009865825	Dart Trucking Company Inc.	41738 Esterly Drive Columbiana, OH 44408	800-538-2516
NMD002208627	Rinchem Company Inc.	6133 Edith Blvd. NE Albuquerque, NM 87107	505-345-3655
NJD046555033	Lacy's Express, Inc.	26 East Mill Street Pedricktown, NJ 08067	856-299-2569
NJD071629976	SJ Transportation	1176 US Route 40 PO Box 169 Woodstown, NJ 08098	856-769-2741
PAD064035819	Horwith Trucks, INC.	PO Box 7, Rt. 329 Northampton, PA 18067	610-261-2220

Personnel Training Programs

Training Program

Veolia provides formal training for all employees who handle or have the potential to handle chemical substances, to ensure that they respect and are aware of the potential hazards. The training program has been developed to reduce work-related injuries and maintain a safe work environment. All training programs are developed and conducted under the guidance of Veolia's Corporate Training and Development Department and the Corporate Safety and Environmental Health Departments.

The Veolia comprehensive training program incorporates the following:

- A 5-day, 40-hour Orientation Program;
- A monthly 2-hour Training Sessions;
- An annual 8-hour Refresher and Contingency/DPCC/DCR Plan Review.

Orientation Program

The Veolia 5-day, 40-hour orientation program is administered to all new employees involved in waste handling. After completing the program, field and facility personnel will receive a minimum of six months on-the-job training working under direct supervision.

The Orientation Program is designed to instruct the employee on:

- Safety Program & Safety Systems Overview
- Hazard Communication and Awareness
- Fire Safety/Selection and Use of Fire Extinguishers
- Toxicology & Air Monitoring
- Introduction to Reactive Chemicals
- Compressed Gas and Cylinder Safety
- Personal Protective Equipment (PPE)
- Use and Maintenance of the SCBA and Hip-Air
- Use and Maintenance of Air Purifying Respirator
- Site Remediation and Emergency Response
- Spill Control/Work Zones/Decontamination
- Confined Space Entry and Non-Entry Rescue
- Handling Flammable Liquids/Bonding and Grounding
- Field Service/Safety Exercise
- Back Safety
- Drum Handling
- Chemistry and Compatibility Segregation

Monthly Training Sessions

In addition to the above listed training, 2-hour training sessions are held monthly. These sessions cover the topics outlined in the training manual, yet remain flexible enough to review ongoing technical, regulatory, safety, and operational needs. These sessions are also used to address any concerns voiced by the facility or field personnel and to review past accidents and near misses.

Annual 8 Hour Refresher and Contingency/DPCC/DCR Plan Annual Training

All field and facility (HAZWOPER) employees also attend an 8-hour refresher program annually that covers a variety of topics pertaining to the safety, health and environment.

Additionally, there is a complete review of the contingency plan, DPCC/DCR plan and Stormwater plan. The training reviews safety procedures, chemical hazards, PPE and safety equipment. Facility personnel attend classroom training as well as participate in a drill simulation exercise.

Training Records

For each training session records are maintained in the form of sign in sheets that include the name of the attendees, the date, and the topic of training. Annual training records are maintained on a spreadsheet that identifies the department, employee name, job title and date of completed training.

Written job descriptions are also maintained for all operations personnel. The job descriptions indicate the requisite skill, education, and other qualifications, as well as, the duties of employees assigned to each position.

All training records on current employees will be kept until the closure of the facility. Training records on former employees are kept for at least three (3) years from the date the employee last worked at the facility.

Contractor Training Requirements

At a minimum, all Contractor employees must be trained in accordance with 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response, and 29 CFR 1910.1200, Hazard Communication. Other training may be required as dictated by work-task or other regulatory requirements.

Veolia reserves the right to request from the Contractor documentation or certification that an employee has received such training, and to refuse job site admission to any Contractor employee who has not received proper training.

In addition to the listed training and approval requirements, all subcontractors, temporary employees, and new employees receive a site specific “Safety and Emergency Response Orientation” prior to beginning work at the Veolia facility.

5-Year OSHA Summary

VEOLIA
ENVIRONMENTAL SERVICES

Veolia ES Technical Solutions
Flanders, New Jersey Facility
OSHA 300 Log Summary
2013 -2017

SIC Code – 4953 NAICS Code – 562211	2013	2014	2015	2016	2017
Fatalities	0	0	0	0	0
Restricted and Lost Workday Cases	0	2	0	1	0
Lost Workday Cases	0	0	0	0	0
Medical Attention Only Cases (First Aid Only)	4	6	5	9	4
OSHA Recordable Cases	0	0	1	2	1
Employee Hours	184,800	180,600	196,400	199,200	197,927
Recordable Injury Case Rate	0.00	2.21	1.02	2.01	1.01
Lost-time Injury Case Rate	0.00	0.00	0.00	0.00	0.00
Number of Lost Workdays	0	0	0	0	0
Severity Rate	0.00	0.00	0.00	0.00	0.00
EMR Rate	0.81	0.82	0.75	0.46	0.48

Veolia ES Technical Solutions, L.L.C.
Flanders, New Jersey Facility
(NJD 980 536 593)

5-Year Compliance History

Location	Date	Description	Penalty
Flanders, NJ TSDF	5/24/12	NJDEP NOV for improper segregation of waste containers in storage at the facility	$4,500 Settled
Flanders, NJ TSDF	10/9/13	NJDEP NOV for the improper handling of a pail resulting in a small spill.	None

Note: There is a separate compliance history for the Veolia Environmental Services transportation unit (NJD 080 631 369), which is registered under the same address as the Veolia Flanders Facility.

Agency Contacts:

Agency	Contact	Phone #
NJDEP – Waste Compliance	Maria Petix-Kent	609-439-9645
NJDEP – DPCC	Philip Polios	609-292-1690
NJDEP – Reg Medical Waste	Amy Scaffidi	609-588-2444
NJDEP – Transportation	Lawrence Lewis	609-292-6305
EPA – Region II	John Wilk	212-637-4130
EPA – TSCA	Vivian Chin	732-906-6179
Mt. Olive Fire/LEPC	Fred Detoro	973-961-0900
NJDEP – Storm Water	Christopher Brindle	973-656-4099

A Summary of Property, Liability, and Casualty Insurance Protection for Veolia and its Subsidiaries

Veolia offers a very generous and strong indemnity program which is backed by our financial strength, and our unique ability to assume responsibility for conforming waste once it is within the control of Veolia. This indemnity is intended to offer complete assurance to our customers that there are Veolia financial resources available to cover any liability, loss, or damage resulting from or arising out of our negligent acts, omissions, or willful misconduct in performance of the work.

Veolia can and will agree in all instances to be responsible for any and all loss or damage caused by our own acts of negligence, willful misconduct, or breach of the Agreements we enter into. However, as good stewards of our insurance program, and in an effort to effectively manage risks, Veolia prefers to assume an indemnity obligation that requires us to indemnify for any loss or damage that is caused by our own negligent acts, negligent omissions, willful misconduct or breach of the Agreement.

ACORD®

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)
12/04/2017

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

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

PRODUCER Marsh USA, Inc. 540 W. Madison Street Chicago, IL 60661 Attn: Veolia.CertRequest@marsh.com | Fax: 212-948-6063 FLAND	CONTACT NAME: PHONE (A/C, No, Ext): FAX (A/C, No): E-MAIL ADDRESS:
INSURED Veolia ES Technical Solutions, LLC 1 Eden Lane Flanders, NJ 07836	INSURER(S) AFFORDING COVERAGE — NAIC # INSURER A : ACE American Insurance Company — 22667 INSURER B : ACE Fire Underwriters Insurance Company — 20702 INSURER C : AIG Specialty Insurance Company — 26883 INSURER D : N/A — N/A INSURER E : Lexington Insurance Company — 19437 INSURER F :

COVERAGES **CERTIFICATE NUMBER:** CHI-007109222-27 **REVISION NUMBER:** 5

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

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	
A	X COMMERCIAL GENERAL LIABILITY			HDO G27873534	01/01/2018	01/01/2019	EACH OCCURRENCE	$ 1,000,000
	CLAIMS-MADE [X] OCCUR						DAMAGE TO RENTED PREMISES (Ea occurrence)	$ 1,000,000
							MED EXP (Any one person)	$ 10,000
							PERSONAL & ADV INJURY	$ 1,000,000
	GEN'L AGGREGATE LIMIT APPLIES PER:						GENERAL AGGREGATE	$ 1,000,000
	X POLICY [ ] PRO JECT [ ] LOC						PRODUCTS - COMP/OP AGG	$ 1,000,000
	OTHER:							$
A	AUTOMOBILE LIABILITY			ISA H26098353 (AOS)	01/01/2018	01/01/2019	COMBINED SINGLE LIMIT (Ea accident)	$ 1,000,000
	X ANY AUTO						BODILY INJURY (Per person)	$
	OWNED AUTOS ONLY / SCHEDULED AUTOS						BODILY INJURY (Per accident)	$
	HIRED AUTOS ONLY / NON-OWNED AUTOS ONLY						PROPERTY DAMAGE (Per accident)	$
								$
	UMBRELLA LIAB [ ] OCCUR						EACH OCCURRENCE	$
	EXCESS LIAB [ ] CLAIMS-MADE						AGGREGATE	$
	DED [ ] RETENTION $							$
A	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY			WLR C64624131 (AOS)	01/01/2018	01/01/2019	X PER STATUTE [ ] OTH-ER	
B	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? Y/N [N] (Mandatory in NH) N/A			SCF C64624143 (WI) (Retro)	01/01/2018	01/01/2019	E.L. EACH ACCIDENT	$ 1,000,000
	If yes, describe under DESCRIPTION OF OPERATIONS below						E.L. DISEASE - EA EMPLOYEE	$ 1,000,000
							E.L. DISEASE - POLICY LIMIT	$ 1,000,000
C	CPL - SIR $500,000			CPO29329651	01/01/2018	01/01/2019	Occurrence/Aggregate	5,000,000
E	E&O - SIR: $2,000,000			065703543	01/01/2018	01/01/2019	Per Claim/Aggregate	5,000,000

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

CERTIFICATE HOLDER

Veolia ES Technical Solutions LLC
TSDF, 10 Day In-Transit
Sales Office, Service Center
One Eden Lane
Flanders, NJ 07836

CANCELLATION

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

AUTHORIZED REPRESENTATIVE
of Marsh USA Inc.

Manashi Mukherjee — Manashi Mukherjee

AGENCY CUSTOMER ID: 010016
LOC #: Chicago

ACORD®

ADDITIONAL REMARKS SCHEDULE

AGENCY	NAMED INSURED
Marsh USA, Inc.	Veolia ES Technical Solutions, LLC 1 Eden Lane Flanders, NJ 07836
POLICY NUMBER	
CARRIER / NAIC CODE	EFFECTIVE DATE:

ADDITIONAL REMARKS

THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM,
FORM NUMBER: 25 FORM TITLE: Certificate of Liability Insurance

Pollution Legal Liability

Policy Number: W1D4C8170101
Carrier: Lloyd's Syndicates 623/2623
Effective Date: 01/01/2018
Expiration Date: 01/01/2019
Limit: $5,000,000
SIR: $750,000

AGENCY CUSTOMER ID: 010016
LOC #: Chicago

ADDITIONAL REMARKS SCHEDULE

AGENCY Marsh USA, Inc.	NAMED INSURED Veolia ES Technical Solutions, LLC 700 East Butterfield Road, Suite 201 Lombard, IL 60148
POLICY NUMBER	
CARRIER / NAIC CODE	EFFECTIVE DATE:

ADDITIONAL REMARKS

THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM,
FORM NUMBER: 25 FORM TITLE: Certificate of Liability Insurance

Veolia ES Technical Solutions, LLC, 909 West Smith Road, Medina, OH 44256
Veolia ES Technical Solutions, LLC, 5202 Oceanus Drive, Huntington Beach, CA 92649
Veolia ES Technical Solutions, LLC, 4301-H Fortune Place, West Melbourne, FL 32904
Veolia ES Technical Solutions, LLC, 3601 Enterprise Avenue, Valparaiso, IN 46383
Veolia ES Technical Solutions, LLC, 350 Jacobson Drive, Poca, WV 25159
Veolia ES Technical Solutions, LLC, 1125 Hensley Street, Richmond, CA 94801
Veolia ES Technical Solutions, LLC, 125 Factory Lane, Middlesex, NJ 08846
Veolia ES Technical Solutions, L.L.C., Electronics Recycling Division, 90 Pleasant Street, West Bridgewater, MA 02379
Veolia ES Technical Solutions, LLC, 1453 Pinewood Street, 1459 Pinewood Street, Rahway, NJ 07065
Veolia ES Technical Solutions, LLC, Turabo Industrial Park, Rincon Ward Warehouse, Highway 189, Km 3.3, Building 5, Lot A, Gurabo, PR 00778
Veolia ES Technical Solutions, LLC, 1704 W. First Street, Azusa, CA 91702

PERMIT

Under the Environmental Conservation Law (ECL)

Permittee and Facility Information

Permit Issued To:
AMERICAN RECYCLING MANAGEMEN LLC
172-33 DOUGLAS AVE
JAMAICA, NY 11433
(718) 339-2001

Facility:
AMERICAN RECYCLING MANAGEMEN LLC
172-33 DOUGLAS AVE
QUEENS, NY 11433

Facility Location: in QUEENS COUNTY **Village:** Jamaica, NY
Facility Principal Reference Point: NYTM-E: 602.4 NYTM-N: 4506.9
Latitude: 40°42'20.7" **Longitude:** 73°47'16.1"
Project Location: 172-33 Douglas Avenue
Authorized Activity: Operation of a solid waste transfer station and construction and demolition debris processing facility that is authorized to accept only putrescible solid waste (PSW) and construction and demolition debris (C&D). The facility may receive no more than 850 tons per day (TPD) of PSW and 150 TPD of C&D. The maximum amount of PSW allowed on-site at any one time must not exceed 1,700 cubic yards (CY). The maximum amount of C&D allowed on site at any one time must not exceed 850 CY. The facility is authorized to operate 24 hours a day Monday through Friday; closed at 6 PM on Saturday; closed Sunday. The tipping floor in the PSW building will be clean of all solid waste from 8:00 PM to 9:00 PM Monday through Friday and 5:00 PM to 6:00 PM on Saturday.

Permit Authorizations

Solid Waste Management - Under Article 27, Title 7
Permit ID 2-6307-00108/00002
Renewal Effective Date: 3/27/2014 Expiration Date: 3/26/2019

NYSDEC Approval

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, and all conditions included as part of this permit.

Permit Administrator: JOHN F CRYAN, Regional Permit Administrator
Address: NYSDEC REGION 2 HEADQUARTERS
47-40 21ST ST
LONG ISLAND CITY, NY 11101-5407

Authorized Signature: Date 03/25/2014

ATTACHMENT C

ADDENDUM TO SHARPS COMPLIANCE, INC. ENGINEERING REPORT FOR REGULATED MEDICAL WASTE TRANSFER STATION (REVISED August 20, 2018)

APPENDIX E – APPLICATION FOR SOLID WASTE MANAGEMENT FACILITY PERMIT FORM

[illegible]

New York State of Opportunity | Department of Environmental Conservation

DEPARTMENT USE ONLY	
DEC APPLICATION NO.	
DEC ATTACHMENT NO.	

Division of Materials Management

APPLICATION FOR A SOLID WASTE MANAGEMENT FACILITY PERMIT

Please read all instructions before completing this application

Reset Form

Please TYPE or PRINT clearly

1. APPLICATION TYPE (CHECK ALL APPLICABLE BOXES):
- [X] Initial/New
- [ ] Renewal
- [ ] Subsequent Landfill Stage (New)
- [ ] Modification

2. APPLICANT IS:
- [ ] Facility Owner
- [ ] Facility Operator

3. IS APPLICATION FILED BY OR ON BEHALF OF A MUNICIPALITY? [ ] Yes [X] No

[illegible]:

4. FACILITY OWNER'S INFORMATION

Name: MT Realty
Address: [illegible]
City: [illegible]
State/Zip: [illegible] Phone: [illegible]
Email: [illegible]

5. FACILITY OPERATOR'S INFORMATION

Name: Sharps Compliance, [illegible]
Address: [illegible] Shepherd Avenue
City: Brooklyn, [illegible]
State/Zip: [illegible] Phone: [illegible]
Email: [illegible]

6. ENGINEER'S INFORMATION

Name: [illegible]
NY License #: [illegible] Phone: [illegible]
Firm Name: [illegible]
Address: [illegible]
Email: [illegible]

7. FACILITY NAME AND LOCATION (Attach USGS Topo Map showing exact location)

Name: Sharps Compliance, Inc.
Street: [illegible] Shepherd Avenue
City/State/Zip: Brooklyn, NY [illegible]
Town: Brooklyn County: Kings
Coordinates NAD 83: [illegible] NYTM: [illegible]

8. SITE OWNER'S INFORMATION

Name: MT Realty
Address: [illegible]
City/Town: Brooklyn, NY
State/Zip: [illegible] Phone: [illegible]
Email: [illegible]

9. TYPE OF FACILITY (Check all applicable boxes)
- [ ] Composting or Mulch Facility (362-1)
- [ ] C&D Debris Handling & Recovery (361-5)
- [ ] Construction & Demolition Debris Processing (361-5)
- [ ] Household Hazardous Waste Collection (362-4)
- [ ] Land Application Facility (361-2)
- [ ] Landfill (363)
- [X] Regulated Medical Waste (365)
- [ ] Mulch Processing (361-3)
- [ ] Municipal Solid Waste Recovery (362-3)
- [ ] [illegible]
- [ ] [illegible]
- [ ] [illegible]
- [ ] [illegible]
- [ ] Transfer (362-3)
- [ ] Waste Oil (374-2)
- [ ] [illegible]
- [ ] [illegible]

10. NAME(S) OF ALL MUNICIPALITIES SERVED:

[illegible]

11. SOLID WASTES ACCEPTED:

Identify facility capacity and throughput for each waste type, as applicable

[illegible] Regulated Medical Waste [illegible] and,
[illegible]
[illegible]

12. FACILITY SIZE
- a. [illegible]: [illegible]
- b. Total [illegible]: [illegible]
- c. [illegible]: N/A
- d. [illegible]: N/A
- e. [illegible]: N/A

13. IS A VARIANCE REQUESTED FROM ANY PROVISION OF 6 NYCRR PART 360?
[ ] Yes [X] No If yes, please [illegible]

14. CERTIFICATION
[X] [illegible] [ ] [illegible] [ ] [illegible] [ ] [illegible]

I hereby affirm under penalty of perjury that information provided on this form and attached statements and exhibits is true to the best of my knowledge and belief. [illegible]

Title: Chief Executive Officer [illegible] Company: Sharps Compliance, [illegible]

[illegible] that any false statement made herein is punishable [illegible] Section 210.45 of the Penal Law.

Date: 8/[illegible]/18 Signature: [signature] Print Name: David P. Tusa

ATTACHMENT D

ADDENDUM TO SHARPS COMPLIANCE, INC. ENGINEERING REPORT FOR REGULATED MEDICAL WASTE TRANSFER STATION (REVISED AUGUST 21, 2018)

APPENDIX F – ENVIRONMENTAL ASSESSMENT REPORT AND RESPONSES

Instructions for Completing Part 1

Part 1 is to be completed by the applicant or project sponsor. Responses become part of the application for approval or funding, are subject to public review, and may be subject to further verification.

Complete Part 1 based on information currently available. If additional research or investigation would be needed to fully respond to any item, please answer as thoroughly as possible based on current information; indicate whether missing information does not exist, or is not reasonably available to the sponsor; and, when possible, generally describe work or studies which would be necessary to update or fully develop that information.

Applicants/sponsors must complete all items in Sections A & B. In Sections C, D & E, most items contain an initial question that must be answered either "Yes" or "No". If the answer to the initial question is "Yes", complete the sub-questions that follow. If the answer to the initial question is "No", proceed to the next question. Section F allows the project sponsor to identify and attach any additional information. Section G requires the name and signature of the project sponsor to verify that the information contained in Part 1is accurate and complete.

A. Project and Sponsor Information.

Name of Action or Project: Transfer Station Regulated Medical Waste (RMW)		
Project Location (describe, and attach a general location map): 893 Shepherd Avenue, Brooklyn NY 11208. Kings County.		
Brief Description of Proposed Action (include purpose or need): Sharps proposes to use the existing building at 893 Shepherd Ave, which currently serves as a base of operations for Sharps' RMW collection business, as a transfer station where sealed RMW containers already collected by Sharps' DEC permitted collection vehicles (box trucks) could be consolidated into larger vehicles (long-haul trucks) for shipment to out-of-state treatment facilities. All activities will be performed inside the fully enclosed building, which is 22,000 sq. ft, with 20' ceilings and includes 2000' sq. ft. of office space. The building has one drive-in door and two loading docks, is equipped with a sprinkler system and is made of masonry walls with concrete floor. The site's NYC zoning designation is M1-1 Manufacturing, which allows transfer stations. Sharps already collects RMW from local healthcare facilities, prepackaged in leakproof containers compliant with DOT, FDA and OSHA regulations. The proposed transfer station would make it possible for Sharps' collection vehicles to avoid traveling to other long distance transfer stations. The transfer station would generate, at most, 30 collection vehicles and 7 long-haul truck trips per day. The facility will be designed for rapid transfer and minimum retention time. Sealed containers may be temporarily stored unrefrigerated for a time period not to exceed 72 hours. Containers left longer than 72 hours. will be refrigerated (<7c degrees or <45f), but no containers will remain more than 7 days from date of receipt.		
Name of Applicant/Sponsor: Sharps Compliance, Inc.	Telephone: 713-660-3544 E-Mail: cknisley@sharpsinc.com	
Address: 9220 Kirby Drive, Suite 500		
City/PO: Houston	State: Texas	Zip Code: 77054
Project Contact (if not same as sponsor; give name and title/role): Curtis Knisley, Director Quality & Safety	Telephone: 713-660-3544 E-Mail: cknisley@sharpsinc.com	
Address: 9220 Kirby Drive, Suite 500		
City/PO: Houston	State: Texas	Zip Code: 77054
Property Owner (if not same as sponsor): SIT Realty	Telephone: 516-322-7753 E-Mail: aryehrealty@yahoo.com	
Address: 2266 E. 2nd Street		
City/PO: Brooklyn	State: NY	Zip Code: 11223

B. Government Approvals

B. Government Approvals, Funding, or Sponsorship. ("Funding" includes grants, loans, tax relief, and any other forms of financial assistance.)

Government Entity	If Yes: Identify Agency and Approval(s) Required	Application Date (Actual or projected)
a. City Council, Town Board, or Village Board of Trustees ☐Yes☑No		
b. City, Town or Village Planning Board or Commission ☐Yes☑No		
c. City Council, Town or Village Zoning Board of Appeals ☐Yes☑No		
d. Other local agencies ☐Yes☑No		
e. County agencies ☐Yes☑No		
f. Regional agencies ☐Yes☑No		
g. State agencies ☑Yes☐No	NYS Department of Environmental Conservation, RMW Transfer Station permit	
h. Federal agencies ☐Yes☑No		

i. Coastal Resources.

i. Is the project site within a Coastal Area, or the waterfront area of a Designated Inland Waterway? ☐Yes☑No

ii. Is the project site located in a community with an approved Local Waterfront Revitalization Program? ☑Yes☐No

iii. Is the project site within a Coastal Erosion Hazard Area? ☐Yes☑No

C. Planning and Zoning

C.1. Planning and zoning actions.

Will administrative or legislative adoption, or amendment of a plan, local law, ordinance, rule or regulation be the only approval(s) which must be granted to enable the proposed action to proceed? ☐Yes☑No

- **If Yes,** complete sections C, F and G.
- **If No,** proceed to question C.2 and complete all remaining sections and questions in Part 1

C.2. Adopted land use plans.

a. Do any municipally- adopted (city, town, village or county) comprehensive land use plan(s) include the site where the proposed action would be located? ☐Yes☑No

If Yes, does the comprehensive plan include specific recommendations for the site where the proposed action would be located? ☐Yes☑No

b. Is the site of the proposed action within any local or regional special planning district (for example: Greenway Brownfield Opportunity Area (BOA); designated State or Federal heritage area; watershed management plan; or other?) ☐Yes☑No

If Yes, identify the plan(s):

_____

_____

_____

c. Is the proposed action located wholly or partially within an area listed in an adopted municipal open space plan, or an adopted municipal farmland protection plan? ☐Yes☑No

If Yes, identify the plan(s):

_____

_____

_____

C.3. Zoning

a. Is the site of the proposed action located in a municipality with an adopted zoning law or ordinance. ☑ Yes ☐ No
If Yes, what is the zoning classification(s) including any applicable overlay district?
M1-1

b. Is the use permitted or allowed by a special or conditional use permit? ☑ Yes ☐ No

c. Is a zoning change requested as part of the proposed action? ☐ Yes ☑ No
If Yes,
i. What is the proposed new zoning for the site? _____

C.4. Existing community services.

a. In what school district is the project site located? Brooklyn School District 19

b. What police or other public protection forces serve the project site?
New York City Precinct 75

c. Which fire protection and emergency medical services serve the project site?
Fire battalion 39 Engine Ladder 107; EMS Station - Pennsylvania & east NY Treatment & Diagnostic Center.

d. What parks serve the project site?
Linden, Jerome, Elton, Linwood, Woodruff, Cypress Hills and Spring Creek Park.

D. Project Details

D.1. Proposed and Potential Development

a. What is the general nature of the proposed action (e.g., residential, industrial, commercial, recreational; if mixed, include all components)? Industrial and Commercial

b. a. Total acreage of the site of the proposed action? .5 acres
b. Total acreage to be physically disturbed? 0 acres
c. Total acreage (project site and any contiguous properties) owned or controlled by the applicant or project sponsor? .5 acres

c. Is the proposed action an expansion of an existing project or use? ☐ Yes ☑ No
i. If Yes, what is the approximate percentage of the proposed expansion and identify the units (e.g., acres, miles, housing units, square feet)? % _____ Units: _____

d. Is the proposed action a subdivision, or does it include a subdivision? ☐ Yes ☑ No
If Yes,
i. Purpose or type of subdivision? (e.g., residential, industrial, commercial; if mixed, specify types)
ii. Is a cluster/conservation layout proposed? ☐ Yes ☑ No
iii. Number of lots proposed? _____
iv. Minimum and maximum proposed lot sizes? Minimum _____ Maximum _____

e. Will proposed action be constructed in multiple phases? ☐ Yes ☑ No
i. If No, anticipated period of construction: _____ months
ii. If Yes:
- Total number of phases anticipated _____
- Anticipated commencement date of phase 1 (including demolition) _____ month _____ year
- Anticipated completion date of final phase _____ month _____year
- Generally describe connections or relationships among phases, including any contingencies where progress of one phase may determine timing or duration of future phases: _____

f. Does the project include new residential uses? ☐Yes ☑No

If Yes, show numbers of units proposed.

	One Family	Two Family	Three Family	Multiple Family (four or more)
Initial Phase	_____	_____	_____	_____
At completion of all phases	_____	_____	_____	_____

g. Does the proposed action include new non-residential construction (including expansions)? ☐Yes ☑No

If Yes,

i. Total number of structures _____

ii. Dimensions (in feet) of largest proposed structure: _____height; _____width; and _____ length

iii. Approximate extent of building space to be heated or cooled: _____ square feet

h. Does the proposed action include construction or other activities that will result in the impoundment of any liquids, such as creation of a water supply, reservoir, pond, lake, waste lagoon or other storage? ☐Yes ☑No

If Yes,

i. Purpose of the impoundment: _____

ii. If a water impoundment, the principal source of the water: ☐ Ground water ☐ Surface water streams ☐Other specify:

_____

iii. If other than water, identify the type of impounded/contained liquids and their source.

_____

iv. Approximate size of the proposed impoundment. Volume: _____ million gallons; surface area: _____ acres

v. Dimensions of the proposed dam or impounding structure: _____ height; _____ length

vi. Construction method/materials for the proposed dam or impounding structure (e.g., earth fill, rock, wood, concrete):

_____

D.2. Project Operations

a. Does the proposed action include any excavation, mining, or dredging, during construction, operations, or both? (Not including general site preparation, grading or installation of utilities or foundations where all excavated materials will remain onsite) ☐Yes ☑No

If Yes:

i .What is the purpose of the excavation or dredging? _____

ii. How much material (including rock, earth, sediments, etc.) is proposed to be removed from the site?

- Volume (specify tons or cubic yards): _____
- Over what duration of time? _____

iii. Describe nature and characteristics of materials to be excavated or dredged, and plans to use, manage or dispose of them.

_____

_____

i*v.* Will there be onsite dewatering or processing of excavated materials? ☐Yes ☑No

If yes, describe. _____

_____

v. What is the total area to be dredged or excavated? _____acres

vi. What is the maximum area to be worked at any one time? _____ acres

vii. What would be the maximum depth of excavation or dredging? _____ feet

viii. Will the excavation require blasting? ☐Yes ☑No

ix. Summarize site reclamation goals and plan: _____

_____

_____

b. Would the proposed action cause or result in alteration of, increase or decrease in size of, or encroachment into any existing wetland, waterbody, shoreline, beach or adjacent area? ☐Yes ☑No

If Yes:

i. Identify the wetland or waterbody which would be affected (by name, water index number, wetland map number or geographic description): _____

_____

ii. Describe how the proposed action would affect that waterbody or wetland, e.g. excavation, fill, placement of structures, or alteration of channels, banks and shorelines. Indicate extent of activities, alterations and additions in square feet or acres:

_____

_____

_____

_____

iii. Will proposed action cause or result in disturbance to bottom sediments? ☐ Yes ☑ No

If Yes, describe: _____

iv. Will proposed action cause or result in the destruction or removal of aquatic vegetation? ☐ Yes ☑ No

If Yes:

- acres of aquatic vegetation proposed to be removed: _____
- expected acreage of aquatic vegetation remaining after project completion: _____
- purpose of proposed removal (e.g. beach clearing, invasive species control, boat access): _____

_____

- proposed method of plant removal: _____
- if chemical/herbicide treatment will be used, specify product(s): _____

v. Describe any proposed reclamation/mitigation following disturbance: _____

_____

c. Will the proposed action use, or create a new demand for water? ☐ Yes ☑ No

If Yes:

i. Total anticipated water usage/demand per day: _____ gallons/day

ii. Will the proposed action obtain water from an existing public water supply? ☐ Yes ☐ No

If Yes:

- Name of district or service area: _____
- Does the existing public water supply have capacity to serve the proposal? ☐ Yes ☐ No
- Is the project site in the existing district? ☐ Yes ☐ No
- Is expansion of the district needed? ☐ Yes ☐ No
- Do existing lines serve the project site? ☐ Yes ☐ No

iii. Will line extension within an existing district be necessary to supply the project? ☐ Yes ☐ No

If Yes:

- Describe extensions or capacity expansions proposed to serve this project: _____

_____

- Source(s) of supply for the district: _____

iv. Is a new water supply district or service area proposed to be formed to serve the project site? ☐ Yes ☑ No

If, Yes:

- Applicant/sponsor for new district: _____
- Date application submitted or anticipated: _____
- Proposed source(s) of supply for new district: _____

v. If a public water supply will not be used, describe plans to provide water supply for the project: _____

_____

vi. If water supply will be from wells (public or private), maximum pumping capacity: _____ gallons/minute.

d. Will the proposed action generate liquid wastes? ☐ Yes ☑ No

If Yes:

i. Total anticipated liquid waste generation per day: _____ gallons/day

ii. Nature of liquid wastes to be generated (e.g., sanitary wastewater, industrial; if combination, describe all components and approximate volumes or proportions of each): _____

_____

_____

iii. Will the proposed action use any existing public wastewater treatment facilities? ☐ Yes ☑ No

If Yes:

- Name of wastewater treatment plant to be used: _____
- Name of district: _____
- Does the existing wastewater treatment plant have capacity to serve the project? ☐ Yes ☐ No
- Is the project site in the existing district? ☐ Yes ☐ No
- Is expansion of the district needed? ☐ Yes ☐ No

- Do existing sewer lines serve the project site? ☑ Yes ☐ No
- Will line extension within an existing district be necessary to serve the project? ☐ Yes ☑ No

  If Yes:
  - Describe extensions or capacity expansions proposed to serve this project: _____

iv. Will a new wastewater (sewage) treatment district be formed to serve the project site? ☐ Yes ☑ No

If Yes:
- Applicant/sponsor for new district: _____
- Date application submitted or anticipated: _____
- What is the receiving water for the wastewater discharge? _____

v. If public facilities will not be used, describe plans to provide wastewater treatment for the project, including specifying proposed receiving water (name and classification if surface discharge, or describe subsurface disposal plans):

_____

vi. Describe any plans or designs to capture, recycle or reuse liquid waste: _____

_____

e. Will the proposed action disturb more than one acre and create stormwater runoff, either from new point sources (i.e. ditches, pipes, swales, curbs, gutters or other concentrated flows of stormwater) or non-point source (i.e. sheet flow) during construction or post construction? ☐ Yes ☑ No

If Yes:

i. How much impervious surface will the project create in relation to total size of project parcel?

_____ Square feet or _____ acres (impervious surface)

_____ Square feet or _____ acres (parcel size)

ii. Describe types of new point sources. _____

iii. Where will the stormwater runoff be directed (i.e. on-site stormwater management facility/structures, adjacent properties, groundwater, on-site surface water or off-site surface waters)?

_____

- If to surface waters, identify receiving water bodies or wetlands: _____
- Will stormwater runoff flow to adjacent properties? ☐ Yes ☐ No

iv. Does proposed plan minimize impervious surfaces, use pervious materials or collect and re-use stormwater? ☐ Yes ☐ No

f. Does the proposed action include, or will it use on-site, one or more sources of air emissions, including fuel combustion, waste incineration, or other processes or operations? ☑ Yes ☐ No

If Yes, identify:

i. Mobile sources during project operations (e.g., heavy equipment, fleet or delivery vehicles)

Transfer Station would generate, at most, 30 collection vehicles (2 Axles) and 7 Long-haul trips per day.

ii. Stationary sources during construction (e.g., power generation, structural heating, batch plant, crushers)

_____

iii. Stationary sources during operations (e.g., process emissions, large boilers, electric generation)

_____

g. Will any air emission sources named in D.2.f (above), require a NY State Air Registration, Air Facility Permit, or Federal Clean Air Act Title IV or Title V Permit? ☐ Yes ☑ No

If Yes:

i. Is the project site located in an Air quality non-attainment area? (Area routinely or periodically fails to meet ambient air quality standards for all or some parts of the year) ☐ Yes ☐ No

ii. In addition to emissions as calculated in the application, the project will generate:
- _____Tons/year (short tons) of Carbon Dioxide (CO_2)
- _____Tons/year (short tons) of Nitrous Oxide (N_2O)
- _____Tons/year (short tons) of Perfluorocarbons (PFCs)
- _____Tons/year (short tons) of Sulfur Hexafluoride (SF_6)
- _____Tons/year (short tons) of Carbon Dioxide equivalent of Hydroflourocarbons (HFCs)
- _____Tons/year (short tons) of Hazardous Air Pollutants (HAPs)

h. Will the proposed action generate or emit methane (including, but not limited to, sewage treatment plants, landfills, composting facilities)? ☐Yes ☑No

If Yes:

i. Estimate methane generation in tons/year (metric): _____

ii. Describe any methane capture, control or elimination measures included in project design (e.g., combustion to generate heat or electricity, flaring): _____

_____

i. Will the proposed action result in the release of air pollutants from open-air operations or processes, such as quarry or landfill operations? ☐Yes ☑No

If Yes: Describe operations and nature of emissions (e.g., diesel exhaust, rock particulates/dust):

_____

_____

j. Will the proposed action result in a substantial increase in traffic above present levels or generate substantial new demand for transportation facilities or services? ☐Yes ☑No

If Yes:

i. When is the peak traffic expected (Check all that apply): ☐ Morning ☐ Evening ☐Weekend ☐ Randomly between hours of _____ to _____.

ii. For commercial activities only, projected number of semi-trailer truck trips/day: _____

iii. Parking spaces: Existing _____ Proposed _____ Net increase/decrease _____

iv. Does the proposed action include any shared use parking? ☐Yes ☐No

v. If the proposed action includes any modification of existing roads, creation of new roads or change in existing access, describe:

_____

_____

_____

vi. Are public/private transportation service(s) or facilities available within ½ mile of the proposed site? ☐Yes ☐No

vii Will the proposed action include access to public transportation or accommodations for use of hybrid, electric or other alternative fueled vehicles? ☐Yes ☐No

viii. Will the proposed action include plans for pedestrian or bicycle accommodations for connections to existing pedestrian or bicycle routes? ☐Yes ☐No

k. Will the proposed action (for commercial or industrial projects only) generate new or additional demand for energy? ☐Yes ☑No

If Yes:

i. Estimate annual electricity demand during operation of the proposed action: _____

_____

ii. Anticipated sources/suppliers of electricity for the project (e.g., on-site combustion, on-site renewable, via grid/local utility, or other):

_____

iii. Will the proposed action require a new, or an upgrade to, an existing substation? ☐Yes ☑No

l. Hours of operation. Answer all items which apply.

i. During Construction:

- Monday - Friday: N/A
- Saturday: N/A
- Sunday: N/A
- Holidays: N/A

ii. During Operations:

- Monday - Friday: 6:00 AM to 7:00 PM
- Saturday: N/A
- Sunday: N/A
- Holidays: N/A

m. Will the proposed action produce noise that will exceed existing ambient noise levels during construction, operation, or both? ☐ Yes ☑ No

If yes:

i. Provide details including sources, time of day and duration:

_____

_____

ii. Will proposed action remove existing natural barriers that could act as a noise barrier or screen? ☐ Yes ☐ No

Describe: _____

_____

n.. Will the proposed action have outdoor lighting? ☐ Yes ☑ No

If yes:

i. Describe source(s), location(s), height of fixture(s), direction/aim, and proximity to nearest occupied structures:

_____

_____

ii. Will proposed action remove existing natural barriers that could act as a light barrier or screen? ☐ Yes ☑ No

Describe: _____

_____

o. Does the proposed action have the potential to produce odors for more than one hour per day? ☐ Yes ☑ No

If Yes, describe possible sources, potential frequency and duration of odor emissions, and proximity to nearest occupied structures: _____

_____

_____

p. Will the proposed action include any bulk storage of petroleum (combined capacity of over 1,100 gallons) or chemical products 185 gallons in above ground storage or any amount in underground storage? ☐ Yes ☑ No

If Yes:

i. Product(s) to be stored _____

ii. Volume(s) _____ per unit time _____ (e.g., month, year)

iii. Generally describe proposed storage facilities: _____

_____

q. Will the proposed action (commercial, industrial and recreational projects only) use pesticides (i.e., herbicides, insecticides) during construction or operation? ☐ Yes ☑ No

If Yes:

i. Describe proposed treatment(s):

_____

_____

_____

_____

ii. Will the proposed action use Integrated Pest Management Practices? ☐ Yes ☑ No

r. Will the proposed action (commercial or industrial projects only) involve or require the management or disposal of solid waste (excluding hazardous materials)? ☐ Yes ☑ No

If Yes:

i. Describe any solid waste(s) to be generated during construction or operation of the facility:

- Construction: _____ tons per _____ (unit of time)
- Operation : _____ tons per _____ (unit of time)

ii. Describe any proposals for on-site minimization, recycling or reuse of materials to avoid disposal as solid waste:

- Construction: _____

  _____
- Operation: _____

  _____

iii. Proposed disposal methods/facilities for solid waste generated on-site:

- Construction: _____

  _____
- Operation: _____

  _____

s. Does the proposed action include construction or modification of a solid waste management facility? ☐ Yes ☑ No

If Yes:

i. Type of management or handling of waste proposed for the site (e.g., recycling or transfer station, composting, landfill, or other disposal activities): _____

ii. Anticipated rate of disposal/processing:

- _____ Tons/month, if transfer or other non-combustion/thermal treatment, or
- _____ Tons/hour, if combustion or thermal treatment

iii. If landfill, anticipated site life: _____ years

t. Will proposed action at the site involve the commercial generation, treatment, storage, or disposal of hazardous waste? ☐ Yes ☑ No

If Yes:

i. Name(s) of all hazardous wastes or constituents to be generated, handled or managed at facility: _____

_____

_____

ii. Generally describe processes or activities involving hazardous wastes or constituents: _____

_____

_____

iii. Specify amount to be handled or generated _____ tons/month

iv. Describe any proposals for on-site minimization, recycling or reuse of hazardous constituents: _____

_____

_____

v. Will any hazardous wastes be disposed at an existing offsite hazardous waste facility? ☐ Yes ☑ No

If Yes: provide name and location of facility: _____

_____

If No: describe proposed management of any hazardous wastes which will not be sent to a hazardous waste facility:

_____

_____

E. Site and Setting of Proposed Action

E.1. Land uses on and surrounding the project site

a. Existing land uses.

i. Check all uses that occur on, adjoining and near the project site.

☐ Urban ☑ Industrial ☐ Commercial ☐ Residential (suburban) ☐ Rural (non-farm)

☐ Forest ☐ Agriculture ☐ Aquatic ☐ Other (specify): _____

ii. If mix of uses, generally describe:

_____

_____

b. Land uses and covertypes on the project site.

Land use or Covertype	Current Acreage	Acreage After Project Completion	Change (Acres +/-)
• Roads, buildings, and other paved or impervious surfaces	.5	.5	0
• Forested	0	0	0
• Meadows, grasslands or brushlands (non-agricultural, including abandoned agricultural)	0	0	0
• Agricultural (includes active orchards, field, greenhouse etc.)	0	0	0
• Surface water features (lakes, ponds, streams, rivers, etc.)	0	0	0
• Wetlands (freshwater or tidal)	0	0	0
• Non-vegetated (bare rock, earth or fill)	0	0	0
• Other Describe: _____ _____	0	0	0

c. Is the project site presently used by members of the community for public recreation? ☐ Yes ☑ No

i. If Yes: explain: _____

d. Are there any facilities serving children, the elderly, people with disabilities (e.g., schools, hospitals, licensed day care centers, or group homes) within 1500 feet of the project site? ☑ Yes ☐ No

If Yes,

i. Identify Facilities:

Public School 202 and Friends of Crown Heights 17

e. Does the project site contain an existing dam? ☐ Yes ☑ No

If Yes:

i. Dimensions of the dam and impoundment:

- Dam height: _____ feet
- Dam length: _____ feet
- Surface area: _____ acres
- Volume impounded: _____ gallons OR acre-feet

ii. Dam's existing hazard classification: _____

iii. Provide date and summarize results of last inspection:

f. Has the project site ever been used as a municipal, commercial or industrial solid waste management facility, or does the project site adjoin property which is now, or was at one time, used as a solid waste management facility? ☐ Yes ☑ No

If Yes:

i. Has the facility been formally closed? ☐ Yes ☐ No

- If yes, cite sources/documentation: _____

ii. Describe the location of the project site relative to the boundaries of the solid waste management facility:

iii. Describe any development constraints due to the prior solid waste activities: _____

g. Have hazardous wastes been generated, treated and/or disposed of at the site, or does the project site adjoin property which is now or was at one time used to commercially treat, store and/or dispose of hazardous waste? ☐ Yes ☑ No

If Yes:

i. Describe waste(s) handled and waste management activities, including approximate time when activities occurred:

h. Potential contamination history. Has there been a reported spill at the proposed project site, or have any remedial actions been conducted at or adjacent to the proposed site? ☑ Yes ☐ No

If Yes:

i. Is any portion of the site listed on the NYSDEC Spills Incidents database or Environmental Site Remediation database? Check all that apply: ☑ Yes ☐ No

☑ Yes – Spills Incidents database — Provide DEC ID number(s): 1300558 (C and L Sales Corp)

☐ Yes – Environmental Site Remediation database — Provide DEC ID number(s): _____

☐ Neither database

ii. If site has been subject of RCRA corrective activities, describe control measures: _____

iii. Is the project within 2000 feet of any site in the NYSDEC Environmental Site Remediation database? ☑ Yes ☐ No

If yes, provide DEC ID number(s): V00582 , C224139, 224035

iv. If yes to (i), (ii) or (iii) above, describe current status of site(s):

See Appendix F, Section F, additional information 2.1, 2.2 & 2.3.

v. Is the project site subject to an institutional control limiting property uses? ☐ Yes ☑ No

- If yes, DEC site ID number: _____
- Describe the type of institutional control (e.g., deed restriction or easement): _____
- Describe any use limitations: _____
- Describe any engineering controls: _____
- Will the project affect the institutional or engineering controls in place? ☐ Yes ☑ No
- Explain: _____

E.2. Natural Resources On or Near Project Site

a. What is the average depth to bedrock on the project site? <20 feet

b. Are there bedrock outcroppings on the project site? ☐ Yes ☑ No
If Yes, what proportion of the site is comprised of bedrock outcroppings? _____%

c. Predominant soil type(s) present on project site: _____ _____%
_____ _____%
_____ _____%

d. What is the average depth to the water table on the project site? Average: _____ feet

e. Drainage status of project site soils: ☐ Well Drained: _____% of site
☐ Moderately Well Drained: _____% of site
☐ Poorly Drained _____% of site

f. Approximate proportion of proposed action site with slopes: ☐ 0-10%: _____% of site
☐ 10-15%: _____% of site
☐ 15% or greater: _____% of site

g. Are there any unique geologic features on the project site? ☐ Yes ☑ No
If Yes, describe: _____

h. Surface water features.

i. Does any portion of the project site contain wetlands or other waterbodies (including streams, rivers, ponds or lakes)? ☐ Yes ☑ No

ii. Do any wetlands or other waterbodies adjoin the project site? ☐ Yes ☑ No

If Yes to either *i* or *ii*, continue. If No, skip to E.2.i.

iii. Are any of the wetlands or waterbodies within or adjoining the project site regulated by any federal, state or local agency? ☐ Yes ☑ No

iv. For each identified regulated wetland and waterbody on the project site, provide the following information:

- Streams: Name _____ Classification _____
- Lakes or Ponds: Name _____ Classification _____
- Wetlands: Name _____ Approximate Size _____
- Wetland No. (if regulated by DEC) _____

v. Are any of the above water bodies listed in the most recent compilation of NYS water quality-impaired waterbodies? ☐ Yes ☑ No

If yes, name of impaired water body/bodies and basis for listing as impaired: _____

i. Is the project site in a designated Floodway? ☐ Yes ☑ No

j. Is the project site in the 100 year Floodplain? ☐ Yes ☑ No

k. Is the project site in the 500 year Floodplain? ☐ Yes ☑ No

l. Is the project site located over, or immediately adjoining, a primary, principal or sole source aquifer? ☑ Yes ☐ No

If Yes:

i. Name of aquifer: Sole Source Aquifer Names:Brooklyn-Queens SSA . See Appendix F Section F, additional information #3.

m. Identify the predominant wildlife species that occupy or use the project site: _____
N/A

n. Does the project site contain a designated significant natural community? ☐ Yes ☑ No
If Yes:
i. Describe the habitat/community (composition, function, and basis for designation): _____
ii. Source(s) of description or evaluation: _____
iii. Extent of community/habitat:
- Currently: _____ acres
- Following completion of project as proposed: _____ acres
- Gain or loss (indicate + or -): _____ acres

o. Does project site contain any species of plant or animal that is listed by the federal government or NYS as endangered or threatened, or does it contain any areas identified as habitat for an endangered or threatened species? ☑ Yes ☐ No

See Appendix F, Section F, additional information #4.

p. Does the project site contain any species of plant or animal that is listed by NYS as rare, or as a species of special concern? ☐ Yes ☑ No

q. Is the project site or adjoining area currently used for hunting, trapping, fishing or shell fishing? ☐ Yes ☑ No
If yes, give a brief description of how the proposed action may affect that use: _____

E.3. Designated Public Resources On or Near Project Site

a. Is the project site, or any portion of it, located in a designated agricultural district certified pursuant to Agriculture and Markets Law, Article 25-AA, Section 303 and 304? ☐ Yes ☑ No
If Yes, provide county plus district name/number: _____

b. Are agricultural lands consisting of highly productive soils present? ☐ Yes ☑ No
i. If Yes: acreage(s) on project site? _____
ii. Source(s) of soil rating(s): _____

c. Does the project site contain all or part of, or is it substantially contiguous to, a registered National Natural Landmark? ☐ Yes ☑ No
If Yes:
i. Nature of the natural landmark: ☐ Biological Community ☐ Geological Feature
ii. Provide brief description of landmark, including values behind designation and approximate size/extent: _____

d. Is the project site located in or does it adjoin a state listed Critical Environmental Area? ☐ Yes ☑ No
If Yes:
i. CEA name: _____
ii. Basis for designation: _____
iii. Designating agency and date: _____

e. Does the project site contain, or is it substantially contiguous to, a building, archaeological site, or district which is listed on, or has been nominated by the NYS Board of Historic Preservation for inclusion on, the State or National Register of Historic Places? ☐ Yes ☑ No

If Yes:

i. Nature of historic/archaeological resource: ☐ Archaeological Site ☐ Historic Building or District

ii. Name: ______

iii. Brief description of attributes on which listing is based: ______

f. Is the project site, or any portion of it, located in or adjacent to an area designated as sensitive for archaeological sites on the NY State Historic Preservation Office (SHPO) archaeological site inventory? ☑ Yes ☐ No

g. Have additional archaeological or historic site(s) or resources been identified on the project site? ☐ Yes ☑ No

If Yes:

i. Describe possible resource(s): ______

ii. Basis for identification: ______

h. Is the project site within five miles of any officially designated and publicly accessible federal, state, or local scenic or aesthetic resource? ☐ Yes ☑ No

If Yes:

i. Identify resource: ______

ii. Nature of, or basis for, designation (e.g., established highway overlook, state or local park, state historic trail or scenic byway, etc.): ______

iii. Distance between project and resource: ______ miles.

i. Is the project site located within a designated river corridor under the Wild, Scenic and Recreational Rivers Program 6 NYCRR 666? ☐ Yes ☑ No

If Yes:

i. Identify the name of the river and its designation: ______

ii. Is the activity consistent with development restrictions contained in 6NYCRR Part 666? ☐ Yes ☐ No

F. Additional Information

Attach any additional information which may be needed to clarify your project.

If you have identified any adverse impacts which could be associated with your proposal, please describe those impacts plus any measures which you propose to avoid or minimize them.

G. Verification

I certify that the information provided is true to the best of my knowledge.

Applicant/Sponsor Name Chris Ansley Date 08/21/2018

Signature [signature] Title Director Quality & Safety

PRINT FORM

EAF Mapper Summary Report

Wednesday, April 26, 2017 10:40 AM

Disclaimer: The EAF Mapper is a screening tool intended to assist project sponsors and reviewing agencies in preparing an environmental assessment form (EAF). Not all questions asked in the EAF are answered by the EAF Mapper. Additional information on any EAF question can be obtained by consulting the EAF Workbooks. Although the EAF Mapper provides the most up-to-date digital data available to DEC, you may also need to contact local or other data sources in order to obtain data not provided by the Mapper. Digital data is not a substitute for agency determinations.

B.i.i [Coastal or Waterfront Area]	No
B.i.ii [Local Waterfront Revitalization Area]	Yes
C.2.b. [Special Planning District]	Digital mapping data are not available or are incomplete. Refer to EAF Workbook.
E.1.h [DEC Spills or Remediation Site - Potential Contamination History]	Digital mapping data are not available or are incomplete. Refer to EAF Workbook.
E.1.h.i [DEC Spills or Remediation Site - Listed]	Digital mapping data are not available or are incomplete. Refer to EAF Workbook.
E.1.h.i [DEC Spills or Remediation Site - Environmental Site Remediation Database]	Digital mapping data are not available or are incomplete. Refer to EAF Workbook.
E.1.h.iii [Within 2,000' of DEC Remediation Site]	Yes
E.1.h.iii [Within 2,000' of DEC Remediation Site - DEC ID]	V00582 , C224139, 224035
E.2.g [Unique Geologic Features]	No
E.2.h.i [Surface Water Features]	No
E.2.h.ii [Surface Water Features]	No
E.2.h.iii [Surface Water Features]	No
E.2.h.v [Impaired Water Bodies]	No
E.2.i. [Floodway]	No
E.2.j. [100 Year Floodplain]	No
E.2.k. [500 Year Floodplain]	No
E.2.l. [Aquifers]	Yes
E.2.l. [Aquifer Names]	Sole Source Aquifer Names:Brooklyn-Queens SSA
E.2.n. [Natural Communities]	No

E.2.o. [Endangered or Threatened Species]	Yes
E.2.p. [Rare Plants or Animals]	No
E.3.a. [Agricultural District]	No
E.3.c. [National Natural Landmark]	No
E.3.d [Critical Environmental Area]	No
E.3.e. [National Register of Historic Places]	Digital mapping data are not available or are incomplete. Refer to EAF Workbook.
E.3.f. [Archeological Sites]	Yes
E.3.i. [Designated River Corridor]	No

Appendix F. FEAF
Permit No. 2-6105-00889/00001

Section F. Additional Information

1. **Section B. G *ii*. Is the project site located on community with an approved local Waterfront Revitalization Program?**

   This project site is **NOT** within the City's designated coastal zone.

2. **Section E.1. h. *iii*. Is the project within 2000 feet of any site in the NYSDEC Environmental Site Remediation database? DEC ID numbers V00582, C224139 and 224035.**

   Review of Environmental Site Remediation Database Search (ESRD) confirms the following:

   2.1 Site Code: V00582 is located more than 2000 feet from proposed transfer station. This site has been assigned a **Site Classification Code: C (Completed).** "The site remediation has been satisfactorily completed under a remedial program."

   2.2 Site Code: C224139 is located more than 1000 feet from proposed transfer station. This site has been assigned a **Site Classification Code: A**. The site remediation work is underway and according to Site Health Assessment "direct contact with contaminations in the soil is unlikely because the majority of the site is covered with building and pavement. Contaminated groundwater at the site is not used for drinking or other purposes and the site is serviced by a public water supply that obtains water from different source not affected by this contamination."

   2.3 Site Code: 224035 is located 3000 feet or more from the closest point of the proposed transfer station. This site has been assigned a Site Classification Code: 02. Direct contact with contamination is unlikely, the site is fenced, which limits the public access. Contaminated groundwater at the site is not used for drinking or other purposes and the site is serviced by a public water supply that obtains water from different source not affected by this contamination."

   Note: Activities from the proposed transfer station site at 893 Shepherd Avenue, will not involve new development, building modification or land disturbance.

3. **E2. 1. *i*. is the project located over, or immediately adjoining, a primary, principal or sole source aquifer? *i.* Name of the Aquifer: Brooklyn-Queens SSA.**

   The proposed transfer station location is located on the Brooklyn-Queens Sole Source Aquifer (SSA) system. As activities at the transfer station located at 893 Shepherd Avenue will not include new development and building modification, wastewater discharge into groundwater, or construction inside or outside the existing building. Therefore, there is no potential for adverse impact to water supply, wastewater discharge, subsurface components and the Brooklyn-Queens SSA, and no further review is required.

   Note: The site owner has agreed to contract BSD Environmental Group to seal all floor drains with concrete. This action is expected to be completed by October 1st. 2017.

   The proposed project is compliant with this regulation.
   http://www.dec.ny.gov/docs/water_pdf/ssa.pdf

4. **E2. 1. *O*. Does project site contain any species of plant or animal that is listed by the federal government or NYS as endangered or threatened, or does it contain any areas identified as habitat for endangered or threatened species?**

   Since the proposed transfer station site activities will not involve new development, building modification, ground disturbance, or tree removing, plants and animal's habitat will not be affected.

5. **E3. *f.* Is the project site, or any portion of it, located in or adjacent to an area designated as sensitive for archaeological sites on the NY State Historic Preservation Office (SHPO) archaeological site inventory?**

   Although, the proposed transfer station site is located within an archeological sensitive area, the project will not involve new development, building modification or ground disturbance. Therefore, there is no potential for adverse impact to archeological resources, and no further review is required.