Commercial Storage Permit Application

Solomon Corporation
Prairie du Chien Facility
1961 Vena Court
Prairie du Chien, Wisconsin 53821

May 31, 2016
(Revised Draft of April 4, 2016 Application)

When it's on the line.

SOLOMON CORPORATION

40 CFR 761.65 (d)(3)(vii)
Written Certification of Compliance

Solomon Corporation hereby certifies compliance with the storage facility standards in paragraphs (b) and (c) of section 761.65:

Under civil and criminal penalties of law for the making and submission of false or fraudulent statements or representations of (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete.

As to the identified section(s) of this document for which I cannot personally verify truth or accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Thomas M. Hemmer, CEO

Thomas M Hemmer

Signature of Authorized Representative

5-31-16

Date

800-234-2867 • Fax 785-655-2502 • P.O. Box 245 • 103 West Main • Solomon, Kansas 67480 solomoncorp.com

Prairie du Chien, Wisconsin Facility
Commercial Storage Permit Application

Table of Contents

Appendices

1.0 Executive Summary

Solomon Corporation, headquartered in Solomon, Kansas, is submitting a Commercial Storage Permit Application for its new location at 1961 Vena Court, Prairie du Chien, Wisconsin, 53821. The overall plan for this 20,000 square-foot location is to receive transformers and other oil-filled electrical equipment for repair, reclamation/recycling, and inventory. The facility receives known non-PCB (<50ppm) equipment; manifested, known PCB or PCB-contaminated equipment; untested equipment and containers of solid waste such as soil, debris, and compound-filled equipment.

Non-PCB (<50ppm) electrical equipment may be repaired or recycled at the facility. No disposal of PCB-contaminated (50-499ppm) or PCB (≥500ppm) electrical equipment or PCB (≥50ppm) bulk oil occurs at the facility, except for pumping of leaking units into drums or totes. Once a unit or container is determined to contain 50ppm or more PCB, it will be stored at the facility until it can be shipped for disposal to the Commercial Storage facility in Solomon, Kansas or another approved disposal facility. Solomon Corporation is seeking approval only for storage of PCB and PCB-contaminated equipment, drums and other containers, and small totes of PCB oil.

Solomon Corporation Overview

Solomon Corporation was founded in 1971 in Solomon, Kansas by Eugene C. Hemmer. It was a small regional transformer repair and recycling facility for many years. In 1992, the company expanded with a location in Decatur, Tennessee; and in 1997 acquired a permitted Commercial Storage facility in Kingman, AZ, which was later closed with EPA approval in 2001. In 2000, the second generation of the Hemmer family purchased the company and further expanded in 2006 when it acquired a small facility in Grand Junction, Colorado. In 2007, it entered into an agreement to operate the repair/recycling facility in Georgetown, Texas, for the Texas Electric Cooperatives, a service Cooperative with 65 member cooperatives. Solomon Corporation received approval to jointly operate this permitted Commercial Storage facility in conjunction with Texas Electric Cooperatives. In 2008, Solomon Corporation was approved as a Commercial Storer at the receiving facility in Solomon, Kansas as well. In 2014, Solomon Corporation was partially acquired by GFI Holdings, a private equity company based in Los Angeles, California, who operates exclusively in the electrical utility service and supply industry.

Today, Solomon Corporation operates in 4 states: Texas, Colorado, Tennessee, with headquarters in Solomon, Kansas. The facilities in Texas and Kansas operate under a Commercial Storage permit under approval from Regions VI and VII, respectively. The company also operated and successfully closed a facility under the supervision of Region IV in Arizona. The facility at Prairie du Chien will be the fifth location, and operate under the third Commercial Storage permit, if approved.

Solomon Corporation repairs and re-sells distribution transformers up to 2 MVA, as well as voltage regulators, oil circuit reclosers, and other oil-filled equipment. The four facilities recycle approximately 200,000 pieces of equipment annually by disassembly into component metals and materials. There are field teardown crews that travel to customer sites for environmentally-safe disassembly of large

substations and field service crews that repair substations and other equipment in the field for customers. The company operates three NELAP-accredited PCB-analytical laboratories in Kansas, Texas and Tennessee. Solomon Corporation is the largest company of its kind in the transformer repair/recycle industry, with approximately 550 employees nationwide.

The facility at company headquarters in Solomon, Kansas is the largest location and offers the widest range of services. The Reclamation/Recycling facility operates a registered scrap metal recovery oven (inspected annually by EPA Region VII) and is able to process PCB-Contaminated (50-499ppm) equipment. The PCB (≥50ppm) bulk oil is stored in tanks for shipment to an approved TSDF for disposal by de-chlorination. Equipment and containers that are known or assumed PCB, except for PCB-contaminated equipment, are not disposed of by Solomon Corporation; they are only stored at the facility until they are shipped to an approved disposal facility.

2.0 Prairie du Chien, Wisconsin facility

Physical / Geological Description

The new facility is located within the city of Prairie du Chien, Wisconsin, in Crawford County. It is a 4-acre property, zoned commercial/industrial, with a 20,000 sq. ft. warehouse where equipment will be received, and where non-PCB equipment is repaired and recycled (see Appendix G for facility diagram). The site has a gravel parking lot. The historical use of the site was agricultural. Currently, the area around the site to the north and east is farmland, but it has also been zoned commercial/industrial for further commercial development. Economic development has already begun to the south, where a screen printing company is located. To the west of the property is a railroad track and west of that, a sand/gravel excavator. The Mississippi River is beyond the railroad track and sand company, 1.5 miles to the west of the site. The topography of the property is very level with a gradual slope to the west. The property is not located within the 100-year floodplain.

Building Security

The property is surrounded by a 6-foot fence with a gate that is locked after operating hours. The building has security cameras and an alarm system that is set each night after the facility is closed.

Description of Operations

The proposed operational plan for the Prairie du Chien facility is to receive equipment from North Central United States investor-owned utilities, rural electric cooperatives and municipal power departments, as well as from industrial accounts and electrical contractors in the region. Equipment arrives on semi-truck trailers into one of two truck bays in the building. The trucks are unloaded in the covered unloading area using overhead cranes. The equipment is placed on roller track in the curbed containment area. All waste management activities including sampling, draining of leaking units, and regulated material storage will take place in the curbed containment area. Access to the containment area will be limited to authorized personnel only. Personnel working in the area will wear safety apparel appropriate to the activities performed.

As equipment is unloaded, it is noted as received and verified with the shipping documents. Any discrepancies are noted and addressed immediately. Each unit is assigned a unique Inventory Control (IC) Number. All pertinent unit information is recorded and later entered into the Solomon Corporation database to be maintained as a part of the facility records.

Solomon Corporation uses a color-coded tagging system for each piece of equipment that is received by the facility. The tagging system allows for easy identification of unit status as it moves through the receiving / storage process. See Figure 1 for details:

Unit Tagging & Pumping Color Guide

Tag Color	Unit Class	PCB Level	Oil Pumping Stinger Color
	Untested	Unknown	Do Not Pump if Unknown
	Non-PCB	<2 ppm	<2 ppm
	Non-PCB	2-49 ppm	2-49 ppm
	PCB-Contaminated	50-499 ppm	Do Not Pump - Check with Supervisor
	PCB Unit	≥500 ppm	
	Non-PCB Silicone	<2 ppm	2-49 ppm Pump in Tote
	Non-PCB R-Temp	<2 ppm	2-49 ppm Pump in Tote
	Non-PCB FR3 Fluid	<2 ppm	Pump in Tote
	Repair Unit		All repairs must have a Purple tag

Figure 1

If the equipment requires PCB testing, a yellow tag will be placed on the unit that identifies it as such. It will be moved to a PCB sampling area within the containment area. The unit will then be sampled and the sample analyzed by gas chromatography in our Solomon, Kansas PCB testing laboratory or other accredited PCB testing laboratory. Upon receipt of the analytical results, the unit will be re-tagged in a color corresponding to its PCB test result and moved in accordance with its classification.

If the unit has already been tested for PCB content by the customer, it will be immediately tagged appropriately by PCB content and moved to the area in the facility appropriate to its classification.

Certain units, based on size and amount of fluid, as well as units that are suspected to contain PCBs are sampled in a follow-up analysis in accordance with the company's quality control process.

Equipment classified as non-PCB is moved on to a non-PCB area. Units containing oil is pumped into a used-oil tank, either the <2ppm bulk oil tank or the 2-49ppm tank within the oil storage berm according to the test results. Once the oil is drained from the units, they are evaluated individually for repair or reconditioning. Units that are cost-effective to repair are moved to the repair area or to inventory. The remaining non-PCB units are moved to the reclamation/recycling area for disassembly into component metals for recycling.

Equipment classified as PCB-contaminated (50-499ppm) or PCB (>500ppm) will be tagged according to classification and then moved to the PCB Storage Area, which is also located in the curbed Receiving Area. Each unit or container will be weighed. The generator name, storage date, weight and PCB content will be recorded on each unit's tag. All units will be held in the PCB Storage Area pending shipment to the Solomon, Kansas Commercial Storage Facility or to another TSCA-approved disposal facility. Oil from leaking or potentially leaking units will be pumped into totes or drums to ensure safe transportation to a TSDF.

PCB waste other than oil-filled electrical equipment, such as capacitors and drummed debris, will be tracked through the same receiving, sampling, and documentation processes described above.

The area will be inspected as required by the regulations, and all pertinent information will be recorded for annual document preparation.

Solomon Corporation will conduct quarterly random sampling outside of the PCB Curbed Containment Area to ensure no PCBs have been inadvertently tracked from the Containment Area to other areas of the plant. Wipe sampling, in accordance with the standard wipe test procedure in 40 CFR 761.123, will be conducted with a risk-based focus on areas most likely to exhibit PCB contamination, such as employee entrances and walkways. Three wipe samples will be taken in a 10-foot area immediately outside the Containment Area, and an additional 5 wipe samples will be taken from random locations throughout the facility, such as offices, break room, forklift tires, and other manufacturing and reclamation areas of the plant floor. Wipe samples will be analyzed at the Solomon PCB Laboratory or other accredited PCB Laboratory using the chemical extraction and analysis procedure described in 40 CFR 761.272, and floor cleanup and post cleanup verification as described in the Closure Plan will commence if any of the samples show PCB contamination $\geq$10ug/100cm^2. Records, including a location where each sample was taken and the PCB analytical result will be kept at the facility.

3.0 Facility Storage

761.65 (b)(1) Requirements for Storage Units

The facility and containment area meets the following criteria:

i) Adequate roof and walls to prevent rain water from reaching the stored PCBs and PCB items;

a. The facility is a 20,000 square-foot metal building with a traditional framing and guttering system. The containment area for receiving and PCB storage is inside the building on the southwest side (see Appendix G for facility diagram).

ii) *An adequate floor that has continuous curbing with a minimum 6-inch high curb. The floor and curbing must provide a containment volume equal to at least two times the internal volume of the largest PCB Article or PCB Container or 25 percent of the total internal volume of all PCB Articles or PCB containers stored there, whichever is greater. PCB/radioactive wastes are not required to be stored in an area with a minimum 6-inch high curbing. However, the floor and curbing must still provide a containment volume equal to at least two times the internal volume of the largest PCB Container or 25 percent of all PCB containers stored there, whichever is greater;*

a. The floors of the Receiving / PCB Storage Area are constructed with 6-inch high continuous curbing surrounding the entire storage area. The bermed area of the Receiving / PCB Storage Area is 620 cubic feet, resulting in a containment capacity of 4,638 gallons of PCB fluid. This means the capacity in the curbed area contains substantially more than 25% of the oil contained in the maximum PCB inventory, and more than twice the volume of the largest PCB container stored therein.

iii) *No drain valves, floor drains, expansion joints, sewer lines, or other openings that would permit liquids to flow from the curbed area;*

a. There are no drains or other openings inside the curbed area.

iv) *Floors and curbing constructed of Portland Cement, concrete, or a continuous smooth, non-porous surface as defined in 761.3, which prevents or minimizes penetration of PCBs;*

a. The floor inside the curbed area is sealed concrete.

v) *Not located at a site that is below the 100-year flood water elevation.*

a. The site is not located in the 100-year flood water plain.

761.65 (c)(3) Storage Area Marking

All entryways into the proposed PCB Receiving/Storage Area are marked with the M_L mark as shown in Figure 2; letters with a striped border on a yellow background on a sticker that is at least 15.25cm (6 inches) on each side.

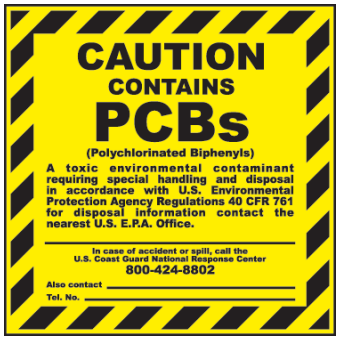


Figure 2

40 CFR 765.65 (c)(4) PCB Movable Equipment

Any item of movable process equipment that is used for handling PCBs and PCB items in the proposed PCB Storage / Receiving Area and that comes into direct contact with PCBs will not be removed from the area unless it has been decontaminated as specified in Solomon Corporation's Commercial Storage Prairie du Chien Facility Closure Plan (see Appendix A).

40 CFR 761.65 (c)(5) Scheduled Inspections

Solomon Corporation personnel will conduct weekly inspections of the PCB Receiving / Storage Area and the PCB articles and containers stored therein. Sample inspection logs are located in Appendix B. Items checked weekly include housekeeping, pumps and hoses, spill clean-up material, container placards, floors, curbing, leaking units or containers, and a verification of the actual PCB inventory against company records. There will also be an annual inspection of cranes, scale, windows, doors, and facility grounds, fences and gates, which will include routine wipe sampling of areas outside of the PCB Containment Area.

The inspector is required to check the status of each item and indicate whether its condition is acceptable or unacceptable. If any inspection items are in unacceptable condition, appropriate and complete information is recorded, including the date and nature or repairs and remedial action.

Any leaking PCB items and their contents will be transferred immediately to properly-marked non-leaking containers. Any spilled materials or liquids will be immediately cleaned up and the materials containing PCBs will be disposed of according to 761.61. Records of inspections, maintenance, cleanup and disposal will be maintained in accordance with 761.180 (a) and (b). See Appendix C for the spill cleanup report form.

The inspection logs will be maintained by calendar year according to frequency. These records provide a case history, along with a record of remedial actions, of all items inspected. Records of the inspections will be kept for five years from the date of each inspection.

40 CFR 761.65 (c)(6) and (7) Containers & Stationary Containers

Bulk PCB oil shipped from customer sites or pumped from leaking units will be stored in 55-gallon drums and 330-gallon totes that meet DOT Hazardous Materials Regulations standards. There will be no stationary containers for bulk storage of PCB fluids.

The facility will maintain a Spill Prevention Control and Countermeasure (SPCC) Plan as required for the bulk storage of non-PCB oil.

40 CFR 761.65 (c)(8) PCB Item Inventory

PCB Items will be dated as to when they were removed from service for disposal. Storage is managed so that PCB items can be located using this date. The inventory of PCB Items in storage will be verified against company warehouse records (the PCB Inventory Log) weekly to account for all items in storage.

Personnel will use logs to record information for each piece of equipment whose PCB liquids are added to storage containers provided in (c)(6) and (7) above. Log information will include the removed from service date, the quantity of oil pumped into the container, and the disposition of PCBs removed from the container.

See Appendix D for a sample of the PCB Inventory Log and the PCB Pump Log.

40 CFR 761.65 (c)(9) Bulk PCB Remediation Waste

Bulk PCB Remediation Waste is typically stored in 55-gallon drums in the PCB Storage Area or Drum Storage Area.

40 CFR 761.65 (c)(10) Record Keeping

Solomon Corporation, as the operator of the storage facility, will maintain records as provided in 761.180.

(i) Solomon Corporation will maintain annual records on the disposition of all PCBs and PCB Items. The annual records will include the following information:

a. All signed manifests generated or received at the facility during the calendar year
b. All Certificates of Disposal that have been generated or received by the facility during the calendar year
c. Records of inspections and cleanups performed by Solomon Corporation

(ii) Solomon Corporation will prepare and maintain a written annual document log by July 1st for the previous calendar year (January through December). The log will be maintained at the facility for at least 3 years after the facility is no longer used for the storage of PCBs and PCB Items. The written annual document log will be available at the facility for inspection by authorized representatives of the EPA. The written annual document log will contain the following information:

a. Name, address, and EPA identification number of the facility
b. Calendar year covered by the annual document log
c. Each manifest generated or received by the facility during the calendar year, unique manifest number, and the name and address of the facility that generated the manifest and the following information
    i. Serial number or other means of identifying each PCB article, not in a PCB Container or PCB Article Container, weight in kilograms of the PCB waste in the PCB Article, date it was removed from service for disposal, date it was received at the facility, date it was placed in transport for off-site disposal and date of disposal (if known);
    ii. Unique number assigned by the generator identifying each PCB Container, description of the contents of each PCB Container, total weight of the PCB waste in kilograms in each PCB Container, first date PCB waste placed in each PCB Container was removed from service for disposal, date received at facility, date each PCB Container was placed in

transport for off-site disposal and date the PCB Container was disposed of (if known); and

iii. Unique number assigned by the generator identifying each PCB Article Container, description of the contents of each PCB Article Container, such as pipes, capacitors, electric motors, pumps, etc., total weight in kilograms of the PCB waste in each PCB Article Container, first date a PCB Article placed in each PCB Article Container was removed from service for disposal, date received at facility, date each PCB Article Container was placed in transport for off-site disposal, and date PCB Article Container was disposed (if known)

(iii) Solomon Corporation will submit an annual report which briefly summarizes the records and annual document log to the EPA Regional Administrator of the Region by July 15 of each year. The annual report will consist of the following information:

a. Name, address, and EPA identification number;
b. List of the numbers of all signed manifests of PCB waste initiated or received by the facility during the calendar year;
c. Total weight in kilograms of PCB waste in PCB Transformers, PCB waste in PCB Large High or Low Voltage Capacitors, PCB waste in PCB Article Containers, and PCB waste in PCB Containers in storage at the facility at the beginning of the calendar year, received or generated at the facility, or transferred to another facility;
d. Total number of PCB Transformers, total number of PCB Large High or Low Voltage Capacitors, total number of PCB Article Containers, and total number of PCB Containers in storage at the beginning of the calendar year, received or generated at the facility, or transferred to another facility;
e. Total weight in kilograms of each of the following PCB categories: PCB waste in PCB Transformers, PCB waste in PCB Large High or Low Voltage Capacitors, PCB waste in PCB Article Containers, and PCB waste in PCB Containers remaining in storage for disposal at the end of the calendar year; and
f. Total number of PCB Transformers, total number of PCB Large High or Low Voltage Capacitors, total number of PCB Article Containers, and total number of PCB Containers remaining in storage for disposal at the end of the calendar year

(iv) All PCB wastes transferred off-site to another facility for disposal will be manifested by Solomon Corporation

(v) For purposes of all reports, PCB Voltage Regulators are recorded and reported as PCB Transformers

4.0 Approval of Commercial Storers of PCB Waste

40 CFR 761.65 (d)(3)(i) Identification of Ownership

Solomon Corporation is officially incorporated in the State of Kansas as Solomon Transformers, LLC. dba Solomon Corporation. Identification of the owners of Solomon Transformers, LLC is illustrated below in Figure 3:

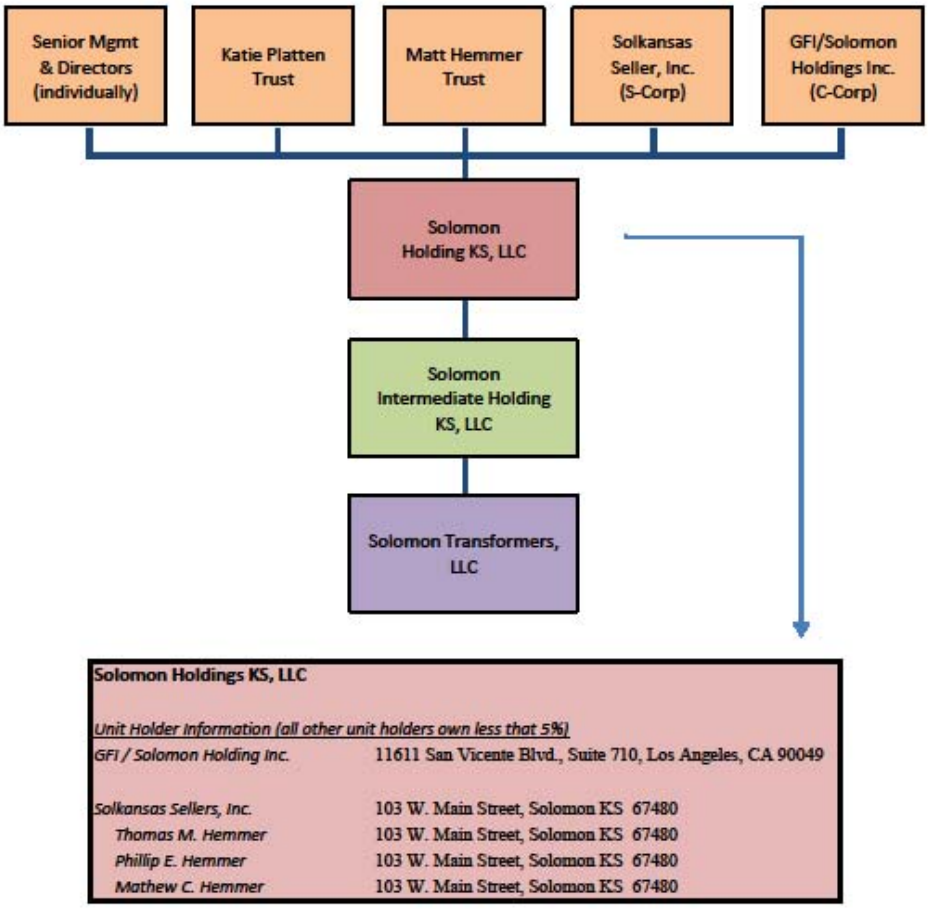


Figure 3

40 CFR 761.65 (d)(3)(ii) Identification of Persons Responsible for Operation of Facility

Appendix E shows the organizational chart for the facility and identifies the individuals who are responsible for operation of the facility and compliance with applicable waste management regulations.

40 CFR 761.65 (d)(3)(iii) Information Pertaining to Qualification to Operate Commercial Storage Facility

Individuals who will be responsible for directing operations and record-keeping for the facility have appropriate experience and training in hazardous waste management. A short resume for each of the individuals named in the organizational chart who have responsibility for environment management and compliance can be found in Appendix F.

Solomon Corporation has developed specific internal training courses for its employees who will be engaged in the handling of PCB wastes. All employees and supervisory staff working in the PCB Containment Area must be certified in the following training courses:

- New Employee & Annual PCB Awareness Training
- New Employee & Annual Hazardous Waste Training
- New Employee & Annual SPCC Training
- New Employee & Annual 8-hour HAZWOPER Awareness Training

Training records and certifications for these employees will be maintained on site for the duration of facility operation.

40 CFR 761.65 (d)(3)(iv) State or Federal Environment Violations in Past Five Years

Solomon Corporation has been issued the following citations or violations in the past five years:

- Solomon Corporation, Decatur, Tennessee facility (EPA ID number TNO001577485) was cited on March 23, 2016 because the facility SWPP did not show the receiving stream, and the non-stormwater discharge documentation did not include the "I certify under penalty of law…" paragraph. No fines are anticipated in this NOV, and Solomon Corporation is updating the SWPP to correct these omissions.
- Solomon Corporation, Georgetown Texas facility (EPA ID number TXD007924178) was cited on August 1, 2013 because Solomon Corporation and the Texas Electric Cooperatives were operating at the same facility under the same SWPP, but Solomon Corporation had not obtained separate authorization for stormwater discharge under MSGP TXR05000. There were no fines associated with the NOV, and Solomon Corporation immediately corrected the NOV by filing a Stormwater NOI with TCEQ. Coverage under MSGP TXR05000 was extended to Solomon Corporation on August 12, 2013.

Supervisory personnel who have worked at other businesses during the past 5 years have not been involved in any state or federal actions concerning environmental violations.

40 CFR 761.65 (d)(3)(v) Companies Currently Owned or Operated in the Past with Waste Handling Activities

Past Operations (Figure 4):

Name & Address	EPA I.D. Number	Years of Operation
Solomon Electric Supply, Inc. 103 W. Main Street P.O. Box 245 Solomon, KS 67480	KSD054757646	1971-1989
Solomon Corporation 4425 Santa Fe Drive Kingman, AZ 86401	AZD982465866	1997-2001

Figure 4

Current Operations (Figure 5):

Name & Address	EPA I.D. Number	Type of Activity
Solomon Corporation 103 W. Main Street Solomon, KS 67480	KSD054757646	Main Repair Shop
Solomon Corporation 302 W. 7th Street Solomon, KS 67480	KSO002431880	Reclamation / Receiving Commercial Storage Permitted Facility
Solomon Corporation 306 S. Poplar Solomon, KS 67480	KSR000010041	Oil Circuit Recloser Repair Shop
Solomon Corporation Highway 58 South Decatur, TN 00000	TNO001577485	Decatur, TN Facility
Solomon Corporation 2377 Leland Avenue Grand Junction, CO 00000	COW00221606	Grand Junction, CO Facility
Solomon Corporation 100 Cooperative Way Georgetown, TX 78626	TXD007924178	Georgetown, Texas Commercial Storage Permitted Facility
Solomon Corporation 1961 Vena Court Prairie du Chien, WI 53821	WIW000157685	Proposed Permitted Facility

Figure 5

40 CFR 761.65 (d)(3)(vi) Maximum Quantity of Waste at Facility

Solomon Corporation has evaluated the storage capacity to ensure that the proposed facility has adequate storage and containment capacity to handle the maximum PCB waste that will be generated at the facility at any one time. The maximum capacity will not exceed 175 PCB Items (PCB Articles, PCB Containers, or PCB Article Containers); with the maximum liquid PCB waste contained within or pumped from these items not to exceed 5100 gallons (175 items X 29 average gallons/each).

40 CFR 761.65 (d)(3)(vii) Written Certification of Compliance

This certification is located on the first page of the permit application.

40 CFR 761.65 (d)(3)(viii) Written Closure Plan

The closure plan for the facility is in Appendix A.

40 CFR 761.65 (d)(3)(ix) Current Cost Closure Estimate

Details of closure costs are in the facility closure plan in Appendix A.

40 CFR 761.65 (d)(3)(x) Demonstration of Financial Responsibility

Solomon Corporation will use the Financial Test and Corporate Guarantee as financial assurance for closure. The Financial Test and Corporate Guarantee will conform to 40 CFR 264.143(f)(10).

Solomon Corporation

Appendix A

Closure Plan with Closure Cost Estimate

Commercial Storage Permit Application

40 CFR 761.65 (e)

Closure Plan

Commercial Storage Facility

Solomon Corporation

1961 Vena Court

Prairie du Chien, WI 53821

May 31, 2016

Closure Plan of Facility

In the event of permanent closure of the Solomon Corporation Prairie du Chien Commercial Storage Facility, the goal of the closure process is:

- Securing the facility / premises to prevent unauthorized post-closure release of PCBs;
- Sampling of any untested equipment to determine PCB content;
- Shipment of all known PCB equipment in the PCB Storage Area / Receiving Area to TSDF for disposal;
- Disposal or cleanup of all process equipment used for PCB handling;
- Cleanup of all PCB Storage Area / Receiving Area & Other Areas, including curbs, walls, and floors; and
- Sampling of facility and surrounding areas for cleanup verification.

Transportation of PCB Wastes to TSDF

The closure plan specifies that all PCB equipment and remediation waste from cleanup activities will be transported by Clean Harbors of Coffeyville LLC, Coffeyville, Kansas, a subsidiary of Clean Harbors, Inc., headquartered in Braintree, Massachusetts. Clean Harbors provides trained, licensed drivers and hazardous-waste-permitted equipment for pickup and transportation of all PCB waste streams. Clean Harbors is a TSDF inspected, approved and used by Solomon Corporation for disposal of PCB oil and material. Their Transporter EPA ID Number is **MAD039322250**.

Disposal of PCB Waste

The closure plan specifies that Clean Harbors of Coffeyville, Kansas will store and/or dispose of all oil, equipment, and remediation waste that contains greater than or equal to 50 ppm PCB with possible subsequent transfer off-site to appropriate company disposal locations. Clean Harbors will drain the PCB fluid up to 1,100 ppm from electrical equipment. Drained electrical equipment will be detoxified in a vapor bath process, while the PCB fluid is chemically detoxified. Any equipment containing greater than 1,100 ppm will be incinerated.

All solid PCB waste will be shipped to Clean Harbors for landfill. Solomon Corporation has separate waste profiles in effect for drums of solids based on the presence of free-flowing liquids. Each drum of solids will be characterized prior to shipment and manifested under the appropriate profile. Solomon Corporation does not anticipate any of these drums of solids will have been in contact with materials that would cause them to fail a TCLP test for metals, volatiles or semi-volatiles; they will be characterized as non-RCRA based on generator knowledge and assumed greater than 500 ppm for disposal purposes. Waste characterization testing for drums of residual water generated from the floor cleaning and the drums of solvent contaminated rags generated during the cleaning of the vertical elevations will be performed prior to disposal. Clean Harbors' EPA ID Number is **KSD981506025.**

761.65 (e)(1)(i) Description of PCB Area Closure

The first step in closure of the PCB Storage / Receiving Area is to assess transformers and other electrical equipment to determine whether it has been tested for PCB content. Any equipment that has been received but not sampled will be tagged as untested and a sample of oil pulled. Each oil sample will be analyzed by an accredited PCB testing laboratory. Upon receipt of the analytical results, the unit sampled will be re-tagged in accordance with its PCB classification.

Units that are classified as non-PCB (<50ppm) will be moved to the non-PCB area, and any units containing oil will be drained. The oil will be pumped into bulk storage tanks designated as Non-PCB Fluid located in the Oil Storage Berm.

Equipment or containers that are known or assumed to be greater than or equal to 50ppm will each be tagged according to its classification, either PCB-contaminated (50-499ppm) or PCB (≥500ppm). These units or containers will then be moved to the PCB Storage Area with any other already classified equipment currently being stored there. Each unit will be weighed. The generator name, storage date, weight, and parts per million PCB will be recorded on each unit. All units will be held in the PCB storage area for shipment to an authorized TSDF for disposal.

Waste other than oil-filled electrical equipment, such as capacitors or drummed soil or debris, will be tracked through the same receiving, sampling and documentation process as described above.

At the end of this process, the PCB Storage Area / Receiving Area will be emptied of equipment and ready for cleanup of process equipment and floors, curbs and walls, followed by the cleanup verification sampling that will be described in this plan under 40 CFR 761.65 (e)(1)(iv).

761.65 (e)(1)(ii) Maximum Extent of Storage Relative to Other Wastes

Solomon Corporation will not engage in the handling of other wastes besides PCBs, so no relative wastes will be involved in closure.

761.65(e)(1)(iii) Maximum Inventory of PCB Wastes

The maximum inventory of PCB wastes in the PCB Storage Area is 175 PCB Articles or PCB Containers; with the maximum liquid PCB waste contained within or pumped from these items not to exceed 5,100 gallons (175 items X 29 average gallons/each). At any given time during the active use of the facility, there would be a mixture of polemount and padmount transformers, regulators, and drummed oil, soil, and debris in the PCB Storage / Receiving Area. For calculation of closure expense, Solomon Corporation is using a 50 KVA transformer as an average PCB Article or Container for weight and size. Historical records show that the average transformer size received at auxiliary facilities (locations other than Solomon, KS) is 40 KVA. Thus the use of 50 KVA (average filled-weight 600 lbs with 29 gallons of fluid) exceeds the company's historical average in terms of unit size and weight. Further, historical records show that drums stored at facilities average around 500-600 pounds. The Prairie du Chien facility would also have a weight limit of 10,000 pounds for receipt of any single untested or known PCB unit due to the crane capacity inside the building PCB Storage / Receiving Area. Disposal costs for this equipment are shown in the Closure Cost Estimate near the end of the Closure Plan.

40 CFR 761.65 (e)(1)(iv) Removal or Decontamination of PCB Waste Residues and Contaminated Containment System Components, Equipment, Structures, and Soils

System components and process equipment used in storage areas will either be de-contaminated or disposed of in a TSCA-approved landfill**.** Non-porous processing equipment to be de-contaminated will be processed by using the double wash/double rinse method described in Subpart S (Double Wash/Double Rinse Method for Decontaminating Non-Porous Surfaces). As proscribed in this method, all exposed surfaces will be washed with mineral oil and vigorously scrubbed with a hard-bristled brush; the item will then be rinsed, then washed and scrubbed a second time. A final rinse will complete the procedure. All rinsate will be collected, contained, sampled and disposed of in accordance with 40 CFR 761.60(a). Following de-contamination of the processing equipment covered by this section, wipe

samples shall be taken to confirm the effectiveness of de-contamination procedure. Non-porous processing equipment shall be de-contaminated to <10ug/100cm^2.

If wipe samples fail to show de-contamination to the <10ug/100cm^2 cleanup standard, the double wash /double rinse method will either be repeated and followed by new wipe sample testing, or the piece of equipment will be shipped to Clean Harbors of Coffeyville for disposal. Porous surfaces that contain no free flowing liquids or items that would not be cost-effective to attempt de-contamination (such as small tools like drills or hammers) will also be sent for disposal.

Equipment in this area for cleanup or disposal in a TSCA landfill includes the following in Table 1:

Description of Process Equipment	**Weight in Pounds**
Roller track/Conveyor 350 linear feet X 47 lbs./linear foot	16,450
Portable pumps and hoses	275
Miscellaneous small tools	500
Scale	620
Total Weight	17,845

Table 1

Facility De-Contamination

Once the electrical equipment and PCB wastes are sent for disposal and the processing equipment is de-contaminated or sent for landfill disposal, the building de-contamination will begin. The facility diagram is shown in Appendix G.

PCB Storage Area / Receiving Area

The curbed PCB Storage Area / Receiving Area will have the highest potential for direct exposure to PCBs. The storage area is where PCB Articles and PCB Containers will be stored prior to shipment. While spills during routine facility operations will be cleaned up as they occur, the potential exists for flooring, walls and curbs to come into direct contact with PCBs. The receiving area inside the curb will be where untested electrical equipment is placed for sampling and held until PCB results are known. Known, tested PCB equipment will also move through this area on its way to the PCB Storage Area.

Vertical elevations on the curbs and walls in this area (up to 3 meters in height) will be cleaned with an approved solvent. Waste materials from this process will be assumed PCB (≥500ppm). An estimated three 55-gallon drums of solvent-contaminated rags will be generated by this process. These drums will be shipped to an approved TSDF for disposal.

The sealed concrete floors will then be de-contaminated with a high-pressure steam and scrubbing machine. This process will generate a small amount of residual wash water that will be collected in drums. The residual water will be tested for PCB content and other RCRA solvents before being shipped to an approved TSDF for disposal. An estimated one 55-gallon drum will be generated from the floor cleaning.

After the initial cleanup, post cleanup verification wipe samples will be taken in accordance with 40 CFR 761.300-304 (Subpart P) for non-porous surfaces. Based on the square footage of vertical elevations, the resulting cleanup sampling would require 75 wipe samples, and the floor and curbing sampling would require 192 wipe samples.

Cleanup will be repeated until wipe samples verify <10ug/100cm^2 for non-porous surfaces. Equipment for the cleanup process includes a high-pressure steam and scrubbing machine. The only parts of this machine that would potentially come into contact with PCBs would be the wheels and the scrubbing pad. The wheels will be wrapped in a protective neoprene material which will be disposed of with the other solid PCB waste. The scrubbing pad will also be disposed of with the solid PCB waste.

Other Areas

The Drum Storage Area and Truck Bay have the potential, but a much lower potential, for direct contact with PCBs. The Drum Storage Area would only contain dry, secure storage of PCBs, and the Truck Bay would be a pass-through area only for electrical equipment.

Walls in this area (up to 3 meters in height) will be cleaned with an approved solvent. Waste materials from this process will be assumed PCB (≥500ppm). An estimated three 55-gallon drums of solvent-contaminated rags will be generated by this process. These drums will be shipped to an approved TSDF for disposal.

The sealed concrete floors will then be de-contaminated with a high-pressure steam and scrubbing machine. This process will generate a small amount of residual wash water that will be collected in drums. The residual water will be tested for PCB content and other RCRA solvents before being shipped to an approved TSDF for disposal. An estimated one 55-gallon drum will be generated from the floor cleaning.

After the initial cleanup, post cleanup verification wipe samples will be taken in accordance with 40 CFR 761.300-304 (Subpart P) for non-porous surfaces. Based on the lower potential for direct contact with PCBs and cleanup practices during the life of the facility, Solomon Corporation proposes the use of a sample rate of 30% of the grid's meter squares. Using this method, the total number of cleanup verification wipe samples for the walls and vertical elevations would be 27, or 30% of the area's 90 square meters, and there would be 94 wipe samples on the floors in this area, or 30% of the area's 312 square meters.

Cleanup will be repeated until wipe samples verify <10ug/100cm^2. Equipment for the cleanup process includes a high-pressure steam and scrubbing machine. The only parts of this machine that would potentially come into contact with PCBs would be the wheels and the scrubbing pad. The wheels will be wrapped in a protective neoprene material which will be disposed of with the other solid PCB waste. The scrubbing pad will also be disposed of with the solid PCB waste.

Outdoor Area

In the event of facility closure, there are two potential types of remediation waste surrounding the facility. The unsealed concrete pad right outside of the Truck Bay, and the gravel in the truck approach and the trailer staging areas will be sampled to determine if there is any contamination. The sampling scheme will be set up in accordance with 761.280-289 (Subpart O).

The outdoor concrete pad in front of the Truck Bay is 700 square feet of concrete. Using Subpart O to lay out the 1.5 meter grids would result in 35 concrete borings that would be composited into 7 samples for analysis. If there are any areas of PCB contamination in excess of 1 mg/kg in the concrete, these areas will be excavated and the contaminated concrete sent to an approved landfill for disposal.

The gravel truck approach and trailer staging areas total 10,700 square feet. Using Subpart O to lay out the grid would result in 519 individual gravel samples that would be composited into 58 samples for analysis. In the event that there are any results showing PCB contamination of the gravel in excess of 1 mg/kg, the gravel would be excavated in these areas and re-sampling conducted. Gravel would be drummed up and sent for approved landfill disposal. A re-verification of cleanup by sampling the gravel would follow excavation. When cleanup is complete, the excavator, skidloader and shovels used to excavate will be de-contaminated using the Double Wash/Double Rinse Method described in Subpart S (Double Wash/Double Rinse Method for Decontaminating Non-Porous Surfaces). As proscribed in this method, all exposed surfaces will be washed with mineral oil and vigorously scrubbed with a hard-bristled brush; the items will then be rinsed, then washed and scrubbed a second time. A final rinse will complete the procedure. All rinsate will be collected, contained, sampled and disposed of in accordance with 40 CFR 761.60(a). Following de-contamination of the processing equipment covered by this section, wipe samples shall be taken to confirm the effectiveness of de-contamination procedure. Non-porous processing equipment shall be de-contaminated to <10ug/100cm^2.

40 CFR 761.65(e)(1)(v) Other Activities to Ensure No Post-Closure Releases

Facility Security

At the time of closure following receipt of the final quantity of PCB waste, an inspection of the security systems of the facility will be inspected for integrity. The following systems shall be inspected:

- The 6-ft fence that borders the property will be inspected for any structural problems
- The alarm system and building security cameras will be checked to ensure all is in working order
- Entryways will be identified and doors and overhead doors will be locked

When facility operations cease, only authorized personnel and authorized visitors will be allowed on the property or in the building. All authorized visitors must sign in on a Visitors Sign-In Log. At the end of each workday the site shall be secured by locking all entrances to the building and property. The alarm system will be activated. No visitors to the site will be allowed after working hours unless specifically authorized by Solomon Corporation or the general contractor.

40 CFR 761.65(e)(1)(vi) Schedule for Closure

Closure of the facility is estimated to last five to ten weeks. A detailed listing by area follows in Table 2, which totals 68 working days, although some of the activities can be completed simultaneously (for example, soil sampling and remediation can be performed simultaneously with indoor cleanup):

Closure Task / Step	Time Estimate (Workdays)
Inspect / categorize transformers and tag units requiring PCB test	1
Sample untested units, including wait time for results	10
Drain and load non-PCB inventory	3
Load PCB-Contaminated and PCB equipment for	1

disposal	
De-contaminate process equipment & drum up any equipment that will be disposed of because of low value or porous surfaces	2
Verify cleanup of process equipment by wipe sampling, including wait time for wipe sample results	9
Load any process equipment that has failed the cleanup verification to be shipped for disposal	1
De-contaminate walls and vertical elevations in curbed PCB Storage / Receiving Area & Other Areas	2
Conduct wipe sampling, including wait for results	8
De-contaminate sealed concrete floors in the PCB Storage Area / Receiving Area & Other Areas	2
Verify Cleanup by wipe sampling, including wait times for results	9
Soil sampling, including wait time for results	10
Excavate soil in any areas that have failed the cleanup standard and retest	10
Total Working Days	**68**

Table 2

40 CFR 761.65(e)(1)(vii) Estimated Year of Closure if a Trust Fund is Financial Guarantee

Solomon Corporation has opted to use the Financial Test and Corporate Guarantee for the financial guarantee.

40 CFR 761.65(e)(2) Ancillary to Approved Disposal Facility

Although Solomon Corporation has Commercial Storer approval for facilities in EPA Regions VI and VII, the Prairie du Chien, Wisconsin, facility is not ancillary to another permitted facility within EPA Region V.

40 CFR 761.65(e)(3) Separate Plan

The Prairie du Chien facility does not currently have any TSCA or RCRA permit approvals.

40 CFR 761.65(e)(4) Closure Plan Modifications

Solomon Corporation shall submit a written request to the Regional Administrator for a modification to its storage approval to amend its closure plan whenever:

i. Changes in ownership, operating plans or facility design affect the existing closure plan;
ii. There is a change in the expected year of closure, if applicable; or
iii. In conducting closure activities, unexpected events require a modification of the approved closure plan.

40 CFR 761.65 (e)(5) & (6) Closure Schedule and Notifications

- The written request, including a copy of the amended closure plan, if applicable, will be submitted at least 60 days prior to the final closure of the PCB storage facility is expected to begin.
- This notification shall be no later than 30 days after the date on which the storage facility received its final quantities of PCB waste.
- Within 90 days after receiving the final quantity of PCB waste for storage, Solomon Corporation will remove all PCB waste in storage in accordance with its closure plan.
- Solomon Corporation will complete closure activities within 180 days after receiving its final quantity of PCB waste, unless the Regional Administrator allows, for good cause, an extension to the closure period.

40 CFR 761.65(e)(7) Contaminated Process Equipment, Structures & Soils

During the closure period, Solomon Corporation will dispose of all contaminated process equipment, structures and gravel in accordance with the disposal requirements of Subpart D, unless de-contamination is possible. As the facility becomes the generator of PCB waste through this process, Solomon Corporation will be subject to the generator requirements of Subpart J.

40 CFR 761.65(e)(8) Certification of Closure

Within 60 days of the completion of closure of the Commercial Storage facility, Solomon Corporation will submit to the Regional Administrator, by registered mail or email if approved to do so, a certification that the PCB Storage Facility has been closed in accordance with the approved closure plan. The certification shall be signed by the owner or operator and by an independent registered professional engineer.

40 CFR 761.65(f)(1) Closure Cost Estimate

The closure cost estimate follows this page in Table 3.

Solomon Corporation hereby certifies the closure cost estimate in 761.65(f)(1):

Under civil and criminal penalties of law for the making and submission of false or fraudulent statements or representations of (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete.

As to the identified section(s) of this document for which I cannot personally verify truth or accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Robert J Baird, Environmental Manager

Robert J. Baird Digitally signed by Robert J Baird
Date: 2016.05.31 11:19:02 -05'00'

5/31/2016

Signature of Closure Cost Estimate Preparer | Date

Solomon Corporation Closure Cost Estimate 2016
Prairie du Chien, Wisconsin Facility

Disposal Activity	Number of Units	Pricing Unit: Pound/Hour/Mile/ Each/Drum	Unit Price	Total Cost
Tagging /Sampling Untested Units: 200 untested units @ 12 samples/hour	17	Hour	$50.00	$850
Oil Sample Analysis by GC: 200 samples	200	Each	$50.00	$10,000
Supervisory Time	4	Hour	$75.00	$300
Disposal of Maximum Inventory				
175 units (average 50 KVA size @ 600 lbs/each)	105000	Pound	$0.75	$78,750
Labor to load maximum inventory on semi- trucks: (2 people) x (2 hours/load) x (3 loads)	12	Hour	$50.00	$600
Transportation to Coffeyville, KS for disposal: (3 semi-loads @ 582 miles/each)	1746	Mile	$3.00	$5,238
Supervisory Time	6	Hour	$75.00	$450
PPE/Sampling Supplies	1	Each	$100.00	$100
De-Contamination of Process Equipment				
Evaluate equipment to determine if disposal or de-contamination is required (porous surfaces, or equipment deemed of low value will be shipped for disposal)	3	Hour	$50.00	$150
De-Contamination of Process Equipment Using Double Wash / Double Rinse Method: (2 people) x (16 hours/each)	32	Hour	$50.00	$1,600
Labor for Cleanup Verification Wipe Samples: 60 wipe samples @ 12 samples/hour	5	Hour	$50.00	$250
Wipe Sample Analysis for 60 samples	60	Each	$45.00	$2,700
Second De-Contamination Attempt - Labor	10	Hour	$50.00	$500
Labor for Cleanup Verification Wipe Samples: 24 wipe samples @ 12 samples/hour	2	Hour	$50.00	$100
Wipe Sample Analysis for 24 samples	24	Each	$45.00	$1,080
Disposal Cost for Process Equipment (if all process equipment were sent for disposal)	17845	Pound	$0.44	$7,852
Transportation to Coffeyville, KS of Process Equipment (50% of load @ 582 miles/full load)	291	Mile	$3.00	$873
Supervisory Time	26	Hour	$75.00	$1,950
Brushes, Detergent, PPE, Drums, Sampling Supplies	1	Each	$200.00	$200
De-Contamination of Structure				
PCB Storage Area / Receiving Area				
Labor for Cleanup of Wall & Vertical Elevations in Curbed Containment Area	8	Hour	$50.00	$400
Supplies (Rags, Solvent, Drums, PPE)	1	Each	$200.00	$200

Solomon Corporation Closure Cost Estimate 2016
Prairie du Chien, Wisconsin Facility

Disposal Activity	Number of Units	Pricing Unit: Pound/Hour/Mile/ Each/Drum	Unit Price	Total Cost
Labor for Cleanup Verification Wipe Samples: 75 wipe samples @ 12 samples/hour	6.25	Hour	$50.00	$313
Wipe Sample Analysis for 75 samples	75	Each	$45.00	$3,375
Labor for Cleanup of Floors and Curbing in PCB Containment Area	8	Hour	$50.00	$400
Equipment Rental	1	Each	$500.00	$500
Labor for Floor Cleanup Verification Wipe Samples: 192 wipe samples @ 12 samples/hour	16	Hour	$50.00	$800
Wipe Sample Analysis for 192 samples	192	Each	$45.00	$8,640
Second De-Contamination Attempt - Labor (assuming some areas still show contamination)	4	Hour	$50.00	$200
Labor for Cleanup Verification Wipe Samples: 48 wipe samples @ 12 samples/hour	4	Hour	$50.00	$200
Wipe Sample Analysis for 48 samples	48	Each	$45.00	$2,160
Disposal of PCB Remediation Waste (4 Drums)	4	Drum	$82.50	$330
Analysis of Solvent Contaminated Rags (Composite)	1	Each	$1,000.00	$1,000
Analysis of Wastewater	1	Each	$1,000.00	$1,000
Supervisory Time	23	Hour	$75.00	$1,725
Other Areas				
Labor for Cleanup of Wall & Vertical Elevations in Drum Storage and Truck Bay Area	9	Hour	$50.00	$450
Supplies (Rags, Solvent, Drums, PPE)	1	Each	$200.00	$200
Labor for Cleanup Verification Wipe Samples: 27 wipe samples @ 12 samples/hour (30% Sampling Rate)	2.5	Hour	$50.00	$125
Wipe Sample Analysis for 27 samples	27	Each	$45.00	$1,215
Labor for Cleanup of Floors and Curbing in Drum Storage and Truck Bay Area	16	Hour	$50.00	$800
Equipment Rental	1	Each	$500.00	$500
Labor for Cleanup Verification Wipe Samples: 94 wipe samples @ 12 samples/hour (30% Sampling Rate)	8	Hour	$50.00	$400
Wipe Sample Analysis for 94 samples	94	Each	$45.00	$4,230
Second De-Contamination Attempt - Labor (assuming some areas still show contamination)	8	Hour	$50.00	$400
Labor for Cleanup Verification Wipe Samples: 24 wipe samples @ 12 samples/hour	2	Hour	$50.00	$100
Wipe Sample Analysis for 24 samples	24	Each	$45.00	$1,080
Disposal of PCB Remediation Waste (4 Drums)	4	Drum	$82.50	$330

Solomon Corporation Closure Cost Estimate 2016
Prairie du Chien, Wisconsin Facility

Disposal Activity	Number of Units	Pricing Unit: Pound/Hour/Mile/ Each/Drum	Unit Price	Total Cost
Analysis of Solvent Contaminated Rags (Composite)	1	Each	$1,000.00	$1,000
Analysis of Wastewater	1	Each	$1,000.00	$1,000
Supervisory Time	22	Hour	$75.00	$1,650
Transportation to Coffeyville, KS for 8 drums of PCB Remediation waste: (8% of load @ 582 miles/full load)	47	Mile	$3.00	$141
Sampling / De-Contamination of Outdoor Areas				
Labor for concrete pad borings: (35 borings @ 7/hour)	5	Hour	$50.00	$250
Concrete Samples (35 borings composited into 7 samples)	7	Each	$60.00	$420
Labor for Removal & Loading of Contaminated Concrete: (assuming 2 cubic yards of concrete removed; 2 people @ 5 hours each)	10	Hour	$50.00	$500
Transportation for 8,000 pounds of concrete: (28% of load @ 582 miles)	163	Mile	$3.00	$489
Disposal of Concrete in Landfill	8000	Pound	$0.44	$3,520
Labor for Grid Layout and Gravel Sampling (Grid layout = 1 hour) (519 soil samples @ 12 samples/hour=43 hours)	44	Hour	$50.00	$2,200
Gravel Samples: 519 samples composited into 58 samples for analysis	58	Each	$60.00	$3,480
Labor for Removal of Contaminated Gravel & Gravel Replacement (Crew of 4 X 8 hours)	32	Hour	$50.00	$1,600
Disposal of Drummed Gravel (10 drums)	10	Drum	$82.50	$825
Transportation to Coffeyville, KS for 10 drums of Gravel: (10% of load @ 582 miles/full load)	58	Mile	$3.00	$174
New Sampling to Verify Borders of Contamination - Labor: 120 samples @ 12 samples/hour	10	Hour	$50.00	$500
Soil Samples: 120 samples composited into 14 samples for analysis	14	Each	$60.00	$840
Supplies (PPE, Drums, Drill, Shovels)	1	Each	$500.00	$500
Equipment Rental (Skid Loader & Excavator)	1	Each	$2,000.00	$2,000
Labor to Decontaminate Heavy Equipment	4	Hour	$50.00	$200
Labor for Wipe Sampling Heavy Equipment	1	Hour	$50.00	$50
Wipe Samples for Heavy Equipment: 6 samples	6	Each	$45.00	$270
Supervisory Time	51	Hour	$75.00	$3,825

Solomon Corporation Closure Cost Estimate 2016
Prairie du Chien, Wisconsin Facility

Disposal Activity	Number of Units	Pricing Unit: Pound/Hour/Mile/ Each/Drum	Unit Price	Total Cost
Transportation to Coffeyville, KS for 4 drums of Closure Waste: (4% of load @ 582 miles/full load)	23	Miles	$3.00	$69
Certification of Closure				
Engineering Fee for Certification of Closure	1	Each	$1,200.00	$1,200
Subtotal Cleanup Fee				$171,318
10% Contingency				$17,132
Total Estimated Closure Cost				$188,450

Cells shaded in blue indicate tasks that will only be performed in the event that additional contamination is found

Additionally, with regard to the costs estimated in the closure plan:

i. Costs are calculated at most expensive;
ii. Costs are calculated as if all activities are performed by contractors rather than Solomon Corporation affiliates;
iii. Costs are calculated at current off-site disposal rates;
iv. Costs do not include any salvage value credits for land, structures, or inventory.

40 CFR 761.65(f)(2) Inflationary Adjustments to Closure Cost Estimate

Annually, Solomon Corporation will examine the Closure Cost Estimate to account for any inflation of closure costs. The review will be complete within 30 days of the December 31 close of Solomon Corporation's fiscal year.

40 CFR 761.65(f)(3) Revision of Closure Cost Estimate if Modifications to Closure Plan are Approved

Solomon Corporation shall submit a revised Closure Cost Estimate within 30 days after a modification is approved by the Regional Administrator if the modification increases closure cost estimates.

40 CFR 761.65(f)(4) Closure Cost Estimate Kept at Facility

Solomon Corporation shall keep the most recent annual Closure Cost Estimate at the facility.

40 CFR 761.65(g) Financial Assurance for Closure

Solomon Corporation will use the Financial Test and Corporate Guarantee for closure as specified in 40 CFR 264.143(i). The required documentation will be sent to Region V at least 60 days before the first shipment of waste is received at the facility, and it will be sent annually thereafter within 90 days of the December 31 close of Solomon Corporation's fiscal year.

40 CFR 761.65(g)(9) Modifications that Increase PCB Storage Capacity

If a modification to the PCB Storage Facility increases the maximum storage capacity indicated in the permit, the existing LOC will be amended to accommodate the increase. The Director of the Federal or State issuing authority will be notified in writing no later than 30 days from the completion of the modification. The amended LOC will be established and activated no later than 30 days after the Director of the Federal or State issuing authority is notified of the completion of the modification, but prior to the use of the modified portion of the facility.

40 CFR 761.65(h) Release of Owner or Operator

Solomon Corporation and an independent registered professional engineer will issue certification that the final closure has been completed in accordance with the approved closure plan to the Regional Administrator to request release from maintenance of financial assurance.

Solomon Corporation

Appendix B

Inspection Logs

Weekly Inspection Log

Annual Inspection Log

Commercial Storage Permit Application

Weekly Inspection Log

Solomon Corporation

PCB Storage / Receiving Area

Inspection Item	Acceptable? Yes/No	Remedial Action Taken
General Housekeeping: look for trash, trash cans overflowing, oil spills/drips; general		
Clear Walkways – floors swept and free of obstructions or trip hazards		
Hoses, Pumps		
Spill Kit: available; completely stocked; located for easy emergency access		
Containers Properly Labeled: 6X6 PCB Label; Unique ID Number; Storage Date; #9 & UN Label if required		
Floors: sealant, paint in good condition; look for cracks in flooring		
Confirm PCB Area Inventory Against Company Warehouse Inventory Reports		
Check for any leaks/seeping on Equipment in PCB Area		
Dry Storage Area – check for container labeling; housekeeping; pallets in good condition		

Inspected by _____

Date of Inspection_____

Time of Inspection_____

Annual Inspection Log

Solomon Corporation

Facility & Grounds

Inspection Item	Acceptable? Yes/No	Remedial Action Taken
Doors – in good working condition; locks and alarm system working; inventory issued keys		
Crane – in good working condition; crane inspections are up-to-date		
Scale calibrated		
Gravel parking areas – clean, adequate gravel coverage; no oily spots observed		
Fencing – in good working condition		
Gates – in good working condition; locks operating properly; inventory issued keys		
Housekeeping – grounds are clean; no trash		
Routine Wipe Sampling 10 Samples in high traffic areas 5 random samples in building		

Inspected by _____

Date of Inspection_____

Time of Inspection_____

Solomon Corporation

Appendix C

Spill Cleanup Report

Commercial Storage Permit Application

When it's on the line.

SOLOMON CORPORATION

Spill Report Form

Released Product:

Approximate Amount Released:

gallons

(Attach an SDS)

IC Number

PCB concentration (if applicable)

Is the product an Extremely Hazardous Substance? ○ Yes ◉ No

Date: Time:

Area of Release: ○ Interior ○ Exterior Describe location:

Attach pictures as appropriate

If Exterior – was the release on: ☐ Gravel ☐ Concrete ☐ Dirt/Soil ☐ Other (Describe):

☐ Water – If the release was on water did the release reach a stream, river or other body of water?
☐ Yes ☐ No If yes, indicate the name and extent of the release into the waterway:

Structure or container releasing oil: Description of physical damage:

Cause or source of the release:

Cost of Damage:

Amount of product recovered:

Amount of clean-up debris:

List all personnel who responded to the clean-up:

All soil spills must be cleaned up to a 1-foot latteral boundery of the spill; all visible traces of the oil must be removed vertically. All other soild surfaces must be cleaned with an approved solvent and be wipe tested to be less than 10 ug/100 cm^2 before they are placed back in service.

What preventative actions can be taken to prevent similar spills?

Who will be responsible for implementing these preventative actions?

Spill clean-up completed: Date: Time:

By signing this document, I certify the spill clean-up requirements have been met and the information contained in this report is truthful and complete to the best of my knowledge.

Spill Reported by: Date:

800-234-2867 • Fax 785-655-2502 • P.O. Box 245 • 103 West Main • Solomon, Kansas 67480 solomoncorp.com

Solomon Corporation

Appendix D

PCB Inventory Logs

PCB Inventory Log

PCB Pump Log

Commercial Storage Permit Application

List of 92-XXX Units in Whse 91

Confirmed by _____ **Date** _____

The following list of equipment is current as of 3/21/2016

92-001 Transformers, Regs 50 - 499ppm

Confirmed	IC #	Supplier Name	Serial #	PPM	Full Weight	Drained Weight	KVA	Date Placed in Storage
☐	116090931	ABC, Town of	6546952	92	1,159		50.0	3/16/16
☐	116090981	XYZ Energy	F529310-65P	386	1,544		75.0	3/17/16
☐	116090982	XYZ Energy	F532910-65P	299	142		5.0	3/17/16
☐	116090996	DEF Munic Light & Water	57B9630	75	258		10.0	3/7/16
☐	116091233	GHI Electric Coop	73430285	105	209		10.0	3/17/16
☐	116091438	XYZ Energy	D-585644	50	816		100.0	3/8/16
☐	116091640	JKL Electric Coop	67G15056	353	228		10.0	3/17/16
☐	116091662	XYZ Energy	B413991	240	946		50.0	3/1/16
☐	116091664	XYZ Energy	67F20847	286	358		25.0	3/1/16
☐	116091840	ABC, Town of	0056431	51	381		15.0	3/18/16
☐	116091893	ABC, Town of	5936543	63	396		15.0	3/18/16
☐	116091895	ABC, Town of	67D14473	154	239		10.0	3/18/16
☐	116091904	ABC, Town of	E60878	55	178		10.0	3/18/16

Total Weight for all units currently full in Whse: lbs 0 Units

Total Weight for all units as they sit in Whse: 6,854 lbs 13 Units

92-002 Transformers, Regs 500+ ppm

Confirmed	IC #	Supplier Name	Serial #	PPM	Full Weight	Drained Weight	KVA	Date Placed in Storage
☐	116088039	MNOP Gas & Electric	H209641-68P	<1.0	585	416	30.0	3/7/16
☐	116089787	XYZ Energy	5775527	745	657	472	25.0	3/11/16
☐	116090257	JKL Electric Coop	1314469	568	177	134	5.0	3/14/16
☐	116090548	XYZ Energy	7841744	1220	178	141	5.0	3/15/16
☐	116091465	XYZ Energy	66B7643	745	278		10.0	3/17/16

Total Weight for all units currently full in Whse: lbs 0 Units

Total Weight for all units as they sit in Whse: 1,441 lbs 5 Units

92-004 Bushings 500+ ppm or tar

Confirmed	IC #	Supplier Name	Serial #	PPM	Full Weight	Drained Weight	KVA	Date Placed in Storage
☐	083097546	Solomon Internal Gen. Waste	5730-482-1	>500	113		0.0	3/15/16
☐	083097547	Solomon Internal Gen. Waste	5730-482-2	>500	113		0.0	3/15/16
☐	083097548	Solomon Internal Gen. Waste	5730-482-3	>500	70		0.0	3/15/16

Total Weight for all units currently full in Whse: 296 lbs 3 Units

Total Weight for all units as they sit in Whse: 296 lbs 3 Units

The following list of equipment is current as of 3/21/2016

92-005 Drummed Oil 50 - 499 ppm

Confirmed	IC #	Supplier Name	Serial #	PPM	Full Weight	Drained Weight	KVA	Date Placed in Storage
☐	083095776	Solomon Internal Gen. Waste	D3230	50-499			0.0	3/2/16
☐	083095785	Solomon Internal Gen. Waste	D3238	50-499	430		0.0	3/9/16
☐	083095789	Solomon Internal Gen. Waste	D3242	50-499			0.0	3/17/16
☐	116091552	XYZ Energy	D13666	>50	454		0.0	2/3/16
☐	116091553	XYZ Energy	D13633	>50	258		0.0	2/3/16
☐	116091554	XYZ Energy	D13628	>50	458		0.0	2/3/16
☐	116091555	XYZ Energy	D13632	>50	464		0.0	2/3/16
☐	116091557	XYZ Energy	D13682	>50	456		0.0	2/3/16

8 Units

92-033 Small Oil Switch 500+ ppm

Confirmed	IC #	Supplier Name	Serial #	PPM	Full Weight	Drained Weight	KVA	Date Placed in Storage
☐	116091924	ABC, Town of	P6568MA	571	37		0.0	3/18/16
☐	116091925	ABC, Town of	P6506MA	561	37		0.0	3/18/16
☐	116091926	ABC, Town of	P6531MA	562	38		0.0	3/18/16

Total Weight for all units currently full in Whse: lbs — 0 Units

Total Weight for all units as they sit in Whse: 112 lbs — 3 Units

92-037 Lab Waste/Sample Btls 500+ppm

Confirmed	IC #	Supplier Name	Serial #	PPM	Full Weight	Drained Weight	KVA	Date Placed in Storage
☐	083095781	Solomon Internal Gen. Waste	L818	>500			0.0	3/7/16

Total Weight for all units currently full in Whse: 0 lbs — 1 Units

Total Weight for all units as they sit in Whse: 0 lbs — 1 Units

92-047 Drummed Debris Assume 50+ pp

Confirmed	IC #	Supplier Name	Serial #	PPM	Full Weight	Drained Weight	KVA	Date Placed in Storage
☐	083095778	Solomon Internal Gen. Waste	D3232	50-499	304		0.0	3/3/16
☐	083095779	Solomon Internal Gen. Waste	D3233	50-499	424		0.0	3/3/16
☐	083095780	Solomon Internal Gen. Waste	D3234	50-499	397		0.0	3/3/16
☐	083095784	Solomon Internal Gen. Waste	D3237	50-499	258		0.0	3/8/16
☐	083095786	Solomon Internal Gen. Waste	D3239	50-499			0.0	3/10/16
☐	083095787	Solomon Internal Gen. Waste	D3240	50-499			0.0	3/10/16
☐	083095790	Solomon Internal Gen. Waste	D3243	50-499			0.0	3/17/16
☐	083095791	Solomon Internal Gen. Waste	D3244	>500			0.0	3/17/16
☐	116057996	JKL Electric Coop	LD 105149-1	>500			0.0	3/1/16
☐	116082005	JKL Electric Coop	LD105046-1	>500			0.0	2/25/16
☐	116089428	JKL Electric Coop	3216-3	>500	244		0.0	3/3/16
☐	116089430	JKL Electric Coop	3216-1	>500	272		0.0	3/3/16

The following list of equipment is current as of 3/21/2016

Confirmed	IC #	Supplier Name	Serial #	PPM	Full Weight	Drained Weight	KVA	Date Placed in Storage
☐	116091556	Westar Energy	17051	>500	306		0.0	2/29/16
			Total Weight for all units currently full in Whse: 2,205 lbs					13 Units
			Total Weight for all units as they sit in Whse: 2,205 lbs					13 Units

92-048 Drummed Water Assume 50+ ppr

Confirmed	IC #	Supplier Name	Serial #	PPM	Full Weight	Drained Weight	KVA	Date Placed in Storage
☐	116057997	ABC, Town of	LD 105149-2	>500			0.0	3/1/16
☐	116091445	ABC, Town of	A-5	>500	1,044		0.0	3/8/16
☐	116091446	ABC, Town of	A-3	>500	1,048		0.0	3/8/16
☐	116091447	ABC, Town of	A-7	>500	1,118		0.0	3/8/16
☐	116091453	ABC, Town of	B-1	>500	572		0.0	3/8/16
			Total Weight for all units currently full in Whse: lbs					0 Units
			Total Weight for all units as they sit in Whse: 3,782 lbs					5 Units

92-049 Drum Small Caps Assume 500+p

Confirmed	IC #	Supplier Name	Serial #	PPM	Full Weight	Drained Weight	KVA	Date Placed in Storage
☐	083095777	Solomon Internal Gen. Waste	D3231	>500			0.0	3/2/16
			Total Weight for all units currently full in Whse: 0 lbs					1 Units
			Total Weight for all units as they sit in Whse: 0 lbs					1 Units

92-052 Drummed Soil 500+ ppm

Confirmed	IC #	Supplier Name	Serial #	PPM	Full Weight	Drained Weight	KVA	Date Placed in Storage
☐	116088351	XYZ Energy	D20720	>500	484		0.0	2/4/16
☐	116089429	XYZ Energy	3216-2	>500	350		0.0	3/3/16
☐	116091442	XYZ Energy	A-4	>500	688		0.0	3/8/16
☐	116091443	XYZ Energy	A-2	>500	516		0.0	3/8/16
☐	116091444	XYZ Energy	A-1	>500	632		0.0	3/8/16
☐	116091448	XYZ Energy	A-6	>500	468		0.0	3/8/16
☐	116091449	XYZ Energy	A-8	>500	690		0.0	3/8/16
☐	116091450	XYZ Energy	A-9	>500	600		0.0	3/8/16
☐	116091451	XYZ Energy	B-3	>500	498		0.0	3/8/16
☐	116091452	XYZ Energy	B-2	>500	654		0.0	3/8/16
☐	116091454	XYZ Energy	B-5	>500	624		0.0	3/8/16
☐	116091455	XYZ Energy	B-4	>500	570		0.0	3/8/16
			Total Weight for all units currently full in Whse: 6,774 lbs					12 Units
			Total Weight for all units as they sit in Whse: 6,774 lbs					12 Units

92-099 Misc. Other 500+ ppm

Confirmed	IC #	Supplier Name	Serial #	PPM	Full Weight	Drained Weight	KVA	Date Placed in Storage
☐	116088892	JKL Electric Coop	F581498-66P	1270	232	189	15.0	3/10/16
			Total Weight for all units currently full in Whse: lbs					0 Units
			Total Weight for all units as they sit in Whse: 189 lbs					1 Units

PCB Item Pump Log
Whse XX

LoadNum	IC Number	Serial Number	KVA	Storage Date (Analytical) record on unit also	PPM	Weight of unit in LBS (FULL)	Weight of unit in LBS (EMPTY)	Disposal Container ID#	Date unit pumped to Storage Container

Solomon Corporation

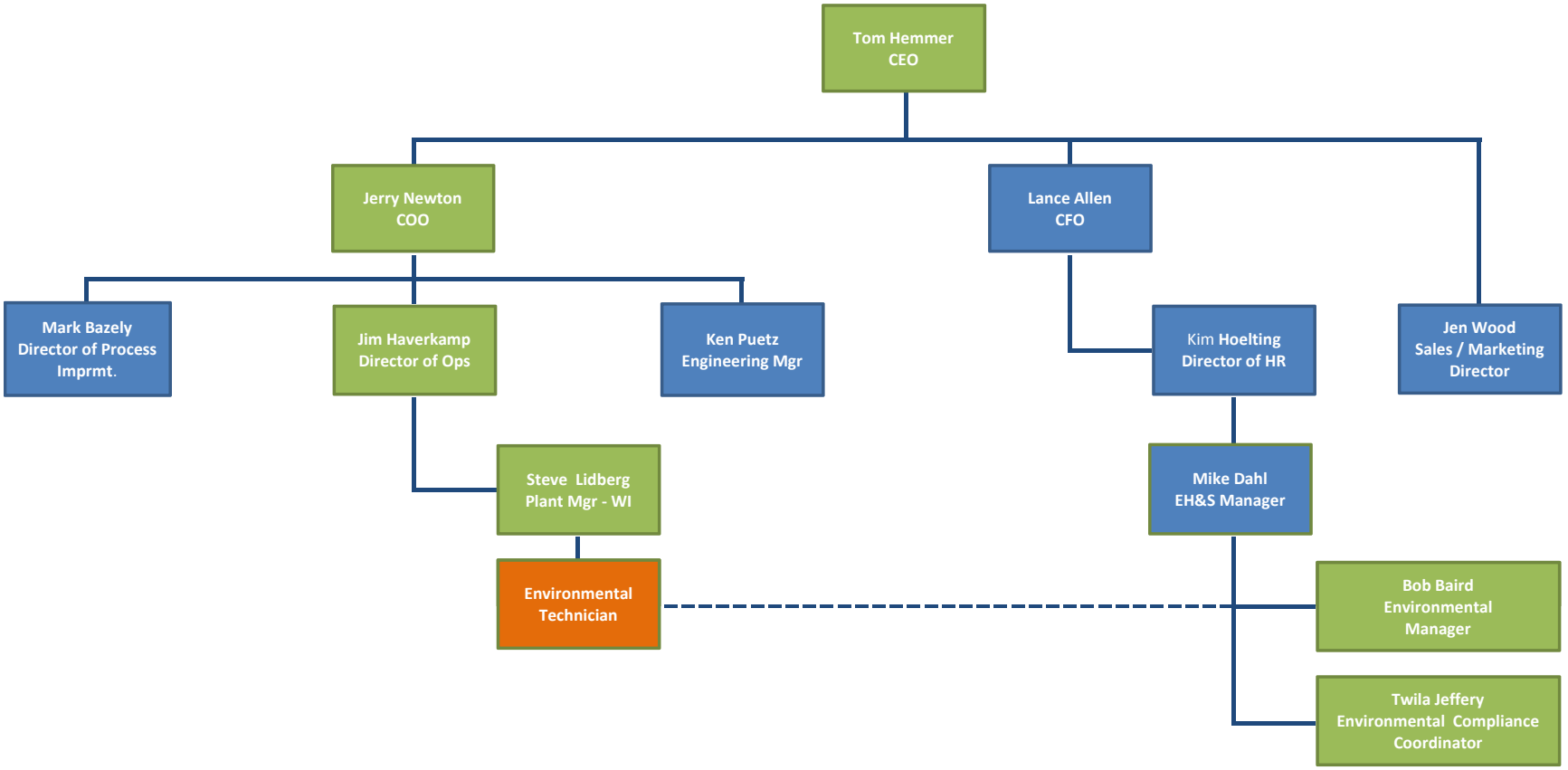
Appendix E

Organizational Chart

Commercial Storage Permit Application

Prairie du Chien EH&S Organizational Chart

updated March 29, 2016



Legend:
- 40 CFR 761.65(d)(3)(iii) Resume Attached
- Not part of facility PCB management
- This position is vacant - to be hired

Solomon Corporation

Appendix F

Resumes

Commercial Storage Permit Application

Tom Hemmer
President & CEO
103 W. Main Street, Solomon, KS 67480
(785) 655-2191, Ext. 179
themmer@solomoncorp.com

Training, Certifications & On-going Education

- Bachelor of Science, Economics, 1989, Kansas State University, Manhattan, KS

Experience

Solomon Corporation
President & CEO, 2013 to Present

- Responsible for providing strategic leadership to the organization by working with all areas of management to establish long-term goals, strategies, plans, and policies. Provide overall direction for the creation, communication, and implementation of the organization's vision, mission, and strategy.

Sales Manager, 2002 to 2013

- Managerial responsibilities for 18 member sales department with $35 million in annual sales volume of remanufactured and repaired electrical equipment. Participated in purchase of Solomon Corporation from founder, Eugene Hemmer.

US Congressman, Jerry Moran (KS-01)
Chief of Staff, 1996 to 2001

- Managerial responsibility for congressional office operations and 12-member staff. Served as chief political and policy advisor for Congressman Moran.

US Congressman, Pat Roberts (KS-01)
Legislative/Press Assistant, 1991 to 1996

- Served as Legislative Assistant to agriculture and environmental issues. Served as press assistant to the House Agriculture Committee during Federal Farm Bill formulation in 1995 and 1996. Also served as volunteer campaign staffer for successful 1996 Senate campaign.

US Congressman Dick Nichols (KS-05)
Legislative Assistant, 1991

- Legislative Assistant for agriculture and environmental issues. General staff assistant, constituent service duties.

Jerry D. Newton
Chief Operating Officer
103 W. Main Street, Solomon, KS 67480
(785) 655-2191, Ext. 126
jnewton@solomoncorp.com

Training, Certifications & On-going Education

- Tuck School of Business at Dartmouth College, Hanover, New Hampshire, Master of Business Administration, June 2000
- University of Arkansas, Fayetteville, Arkansas, Bachelor of Science in Mechanical Engineering, May 1995

Experience

Solomon Corporation
COO, 2015 to present

- Responsible for strategic process stewardship, in addition to all-inclusive responsibilities for its operating units. Goal is to significantly grow the company while commensurately improving channel, operational, and personnel capabilities.

Deere and Company
John Deere Cylinder, Global Director, 2009 to 2015

- Globally responsible for Deere's Cylinder business with direct functional and business unit control. Responsible for all aspects of strategic planning and tactical execution for the business in support of many Deere equipment platforms. Lead the ~80M USD renewal and expansion of Deere Cylinder.

John Deere Davenport Works, Operations Manager, 2007 to 2009

- Responsible for equipment production generating over 1.2B USD in revenue through strict operational execution and budget control. Responsible for day-to-day operations and manufacturing strategy execution. Provided overall Leadership for Lean Manufacturing deployment and continuous improvement initiatives.

Deere Russian Operations, Manufacturing & Aftermarket Manager, 2004 to 2007

- Led a multi-continent based, cross-functional team in establishing Deere's first assembly facility in Russia. Created the initial business plan and successfully championed the start-up capital and on-going operating expense budget with senior management. Responsible for developing the overall product support mission for Russian sales branch.

John Deere Waterloo Works, Redevelopment Manager, 2003 to 2004

- Manager in charge of deploying lean manufacturing to the drive train assembly areas. Led redevelopment teams that redesigned and re-started assembly lines producing transmissions for John Deere 7000, 8000, and 9000 Series tractors.

John Deere Waterloo Works, Production Supervisor, 2002 to 2003

- Responsible for supervising 20-70 UAW production associates in the small row-crop transmission assembly areas.

John Deere Commercial Products, Implements Manager, 2000 to 2002

- Responsible for managing the small tractor implement business, $70M in sales, for the 4000 and 5000 Series tractors. Served as Product Safety Committee Chairman for the factory.

Booz•Allen & Hamilton
Summer Associate, 1999

Entergy Corporation
Entergy Retail, Performance Engineer, 1997 to 1998
Entergy Nuclear, Design Engineer, 1995 to 1997

Jim Haverkamp
Director of Operations
103 W. Main Street, Solomon, KS 67480
(785) 655-2191, Ext. 190
jhaverkamp@solomoncorp.com

Training, Certifications & On-going Education

- Associate of Applied Science, Electronics
- Electrical & Business Degree, Cloud County Community College and North Central Kansas
- Eaton/Cooper related ASE training for regulators and controls, OCR's and controls, switch gear and transformers

---

Experience

Solomon Corporation

Director of Operations, 2015 to Present

- Responsible for directing multiple-site manufacturing operations through a team of successful leaders consisting of managers and supervisors. Contributes to increasing levels of customer and employee satisfaction while creating cost savings related to staff, materials, and machines.

Senior Operations Manager, Substations and Regulators, 2013 to 2015

- Responsible for the workload and oversight of Substations and Regulators. Lead company-wide initiatives related to safety, quality, cost, and delivery. Improved performance, productivity, efficiency and profitability through the implementation of effective methods and strategies.

CO Plant Manager, 2005 to 2012

- Responsible for directing, planning, and managing the operations of the plant in accordance with the company principles and objectives to optimize cost and quality requirements.

Regulator Department, 1991 to 2005

- Responsible for training, hiring, and developing the skills of a diverse staff for consistent results. Maintained high level of communication with customers, internal customers, and management regarding status of projects and labor concerns. Made decisions related to equipment and staffing.

Steven Lidberg
WI Plant Manager
1961 Vena Ct., Prairie du Chien, WI 53821
(785) 577-7083/Cell
slidberg@solomoncorp.com

Training, Certifications & On-going Education

- Bachelor's Degree in Business Administration, Colorado Mesa University

---

Experience

Solomon Corporation
WI Plant Manager, 2016

- Responsible for all operations and area-specific compliance, environmental and safety compliance, quality control, and punctuality of the business.

On-the-Job Supervisor Trainee, 2014 to 2016

- Responsible for all area operations and the direct supervision of production, safety administration, attendance, discipline, and hiring functions.

Lead, 2007 to 2014

- Performed functions as Transformer Technician, Welder/Fabricator, with the ability to TIG, stick, arc, plasma-sufficient to fixing leaks in transformers, and fabricate internal mounting brackets; ability to complete structural and cosmetic welding on transformers and other shop equipment.
- Performed functions as Transformer Tester. Responsible for testing transformers, crane operations, forklift driving, welding, and safety harness.

Rental Supply Company
Parts Supplier, 2013

- Summer intern and general laborer in water well drilling; managed multi-state advertising for the sale of equipment, parts inventory tracking, and accounting/tax preparation.

Larchwood Inns Assisted Living Center
Dietary Aide, 2004 to 2007

Mike Dahl
Corporate Environmental Health & Safety Manager
103 W. Main Street, Solomon, KS 67480
(785) 655-2191, Ext. 191
mdahl@solomoncorp.com

Training, Certifications & On-going Education

- Total Quality Management, W/C Claims Management, Environmental H&S Management

---

Experience

Solomon Corporation

Corporate Environmental Health & Safety Manager, 2009 to Present

- Responsible for multiple facilities involved in reconditioning and reclamation of electrical distribution and transmission equipment. Responsible for overall environmental, health and safety program including, but not limited to program development, risk management and claims, employee training and development, regulatory integrity, and environmental/lab management.

Corporate Safety Specialist, 2006 to 2009

- Safety Manager of multiple facilities involved in manufacturing, reconditioning, and reclamation of electrical distribution and transmission equipment.

Schwan Food Company

Safety Coordinator, 2002 to 2006

- Safety Coordinator of frozen pizza manufacturing facility with 1800 employees. Responsible for employee training, PSM program integrity and environmental oversight.

Manufacturing Supervisor, 1996 to 2002

- Supervisor of multiple production systems with direct oversight of 40-90 employees. Responsible for attainment, performance, usages, cost per lb., safety, employee training, and development.

Great Plains Manufacturing

Plant Manager, Land Pride Division, 1990 to 1996
Plant Manager, Assaria, 1982 to 1990
Fabrication Superintendent/Welding Supervisor, 1981 to 1982

MAI Steel Service

Fabrication/Welding Project Supervisor, 1974 to 1980

Robert J Baird
Environmental Manager
103 W Main Street, Solomon KS 67480
785-655-2191 ext 148
bbaird@solomoncorp.com

Education

Iowa State University, Ames IA

May, 1999 — Bachelor of Science – Anthropology (emphasis in physical anthropology)
Minor - Chemistry

Training, Certifications & Ongoing Education

- PCB Training through Regulatory Compliance Services (J. Mark Pennell)
- DOT Training through the Environmental Resource Center
- RCRA Training through the Environmental Resource Center
- RCRA Training through McCoy & Associates, Inc.
- HAZWOPER Training (40 hours)

Experience

Continental Analytical Services, Salina KS

September, 1999 — Laboratory Analyst
- Analysis of environmental samples for compliance with EPA regulations

Solomon Corporation, Solomon KS

November, 2001 — Laboratory Director
- Oversight of laboratory operations for all three Solomon laboratories
- Direct management of Solomon, KS laboratory
- PCB analysis of oil samples for compliance with TSCA regulations

January, 2016 — Environmental Manager
- Oversight of RCRA compliance for all five Solomon facilities
- Oversight of Clean Air Act compliance and air permitting for all five Solomon facilities
- Oversight of SPCC and SWPP compliance for all five Solomon facilities
- Oversight of TSCA compliance for all five Solomon facilities
- Oversight of laboratory operations for all three Solomon laboratories
- Direct management of Solomon, KS laboratory

Twila J. Jeffrey
Environmental Compliance Coordinator
103 W. Main Street, Solomon, KS 67480
785-655-2191 ext. 122
tjeffrey@solomoncorp.com

Training, Certifications & Ongoing Education

- PCB Training through Regulatory Compliance Services (J. Mark Pennell)
- DOT Training through the Environmental Resource Center'
- RCRA Training through the Environmental Resource Center
- RCRA Training through McCoy & Associates, Inc.
- HAZWOPER Training (40 hours)

Experience

Solomon Corporation, Solomon, KS

July, 1997 — Yard intake and testing technician
July, 1998 — Lead – Load Out
July, 2000 — Procurement Sales Rep
February, 2005 — Heavy Haul Transportation Coordinator
August, 2005 — Environmental Compliance Coordinator

- Waste management for all five Solomon facilities
- Coordinate all shipments to approved downstream providers out of all facilities
- Annual PCB tracking and reporting to the EPA
- Monitor all warehouses for all equipment (50PPM or greater)
- Create manifests for our outside customers for in-bound loads
- Provide compliance guidance for customers
- Conduct customer training at various customer sites
- Conduct on site customer compliance visits at various customer sites
- Conduct driver training for PCB compliance

Solomon Corporation

Appendix G

Facility Diagram

Commercial Storage Permit Application

Prairie du Chien Facility Diagram