Commercial PCB Storage Facility Application

Environmental Recycling
P.O. Box 167
527 East Woodland Circle
Bowling Green, Ohio 43402
OHR000034025
800-284-9107
Fax-419-354-5110

MASTER

TABLE OF CONTENTS

CHAPTER 1

COMMERCIAL PCB STORAGE FACILITY APPLICATION

The information submitted in this application is in accordance with the requirements of the Toxic Substances Control Act (TSCA) of 1976, as amended and the promulgated regulations in 40 CFR 761. This submittal supercedes all prior TSCA Commercial Polychlorinated Biphenyl (PCB) Storage Facility Application submittals made by Environmental Recycling.

CHAPTER 2

CLOSURE PLAN

This chapter contains the Environmental Recycling (ER) written Closure Plan as required by TSCA regulations 40 CFR 761.65 (d)(iv) and 40 CFR 761.65 (e). This Closure Plan identifies all steps necessary to completely close Environmental Recycling's Commercial PCB Storage Facility.

Environmental Recycling will maintain on-site a copy of the approved closure plan and all revisions of the plan until certification of closure completeness has been submitted and accepted by the Environmental Protection Agency's (EPA) Regional Administrator or Director in Region V. Environmental Recycling will notify the Regional Administrator or Director 60 days prior to the date on which final closure of its PCB storage facility is expected to begin. Within 60 days of completion of closure, Environmental Recycling will submit, by registered mail, to the EPA Regional Administrator or Director a certification signed by both Environmental Recycling and an independent registered professional engineer that the facility has been closed in accordance with the specification in the approved closure plan.

SECTION A

FACILITY DESCRIPTION

This section provides a general description of Environmental Recycling (ER), as required by the Toxic Substances Control Act, as amended (TSCA); the promulgated regulations, 40 CFR 761; and as outlined in the TSCA Guidance Manual For Commercial PCB Storage Facility Applications. This description is intended only to acquaint the permit application reviewer/permit writer with an overview of the facility. More complete details can be found in other parts of this Closure Plan Chapter.

TABLE OF CONTENTS

LIST OF FIGURES

APPENDICES

A-1 GENERAL DESCRIPTION

ER is licensed by the OEPA as a recycling facility with EPA I.D. OHR000034025.

ER operations are focused on providing their customers with services pertaining to the recycling of fluorescent lights, electronics, mercury devices, batteries and other universal wastes to assure compliance with all applicable local, state, and federal regulations. These services include actual removal including transportation. The range of operations is mainly EPA Region V.

ER specializes in transportation and recycling of fluorescent and other mercury containing lights for recycling. ER also assists it clients in complete electrical light change-outs. With the closure of S.D. Myers a Commercial PCB Facility the clients we service along with other small generators are in need of a cost-effective replacement. For this reason, we wish to accept PCB fluorescent light ballasts, electrical equipment, capacitors along with other PCB items and operate a Commercial PCB Storage Facility. (This facility would only accept PCB Material including oil in drums or contained in electrical equipment but not exceed 4900 gallons at one time in our storage area. The material will be in storage no longer than 30 days after securing shipment to a licensed PCB incinerator, landfill, recycle.)

ER's licensed Straight Truck carries special safety equipment and sorbent materials for oil and hazardous material spill cleanup (including PCB's).

The street and mailing address is:

Environmental Recycling
527 East Woodland Circle
Bowling Green, OH 43402

Figure A-1 (Appendix A.I) is a location map, and Figure A-2 (Appendix A.I) is a regional topographic map of the area with a scale of 1:24,000 and 5-foot contour intervals. Figure A-3 (Appendix A.I) is a site plan of the facility complex showing the boundaries and major buildings, containing ER offices, operational areas, and the Commercial PCB Storage Facility. Design specifications, for the ER's Commercial PCB Storage Facility, are provided in Section B.

The leased ER complex of approximately 24000 square feet, owned by Pemm Group, which are the same personal that own and operate Environmental Recycling (ER), is located within the City of Bowling Green, OH. ER is located near the northeast corner of the intersection of Dunbridge Road and south of Poe road, northwest quarter of section 21, Township 4 north, range 11 east, Center Township Wood County, Ohio. Latitudinal and longitudinal coordinates for ER are 83 degrees 36 minutes 11 seconds and 41 degrees 22 minutes 48 seconds respectively. ER began in 1995.

No hazardous wastes are treated nor disposed of on the ER premises. The only hazardous wastes stored at ER are those generated on-site **and those approved by the Ohio EPA as identified in our Part B Hazardous Waste storage permit**. These on-site generated wastes are shipped off-site within 90 days of accumulation for disposal at licensed facilities. All PCB wastes temporarily stored within the ER Commercial PCB Storage Facility will be shipped off-site to licensed disposal facilities within 30 days from the date when the PCB waste was initially removed from service and received at ER after securing disposal.

ER's' complex consists of the covered approximately 24000-square-foot active Lamp/Universal Waste Recycling Facility and an area of 45 feet by 30 feet for the Commercial PCB Storage Facility when approved by Region V EPA.

All containerized solid PCB wastes are unloaded/loaded within the *PCB Storage and Receiving Area.*

A-2 TOPOGRAPHIC MAP

A regional topographic map, showing contours at 5-foot intervals, is provided in Figure A-2 (Appendix A.I). The pattern of surface runoff is slow with moderate on-site infiltration on unpaved areas. The existing floor of the facility is 672 feet. Other information provided in association with the topographic map is summarized in the following sections.

A-2a PCB Storage Facility

As indicated in the facility description above, ER's Commercial PCB Storage Facility is located within ER's complex. Figures A-3 and A-4 show the spatial relationship of ER's Commercial PCB Storage Facility to the other areas which comprise the ER complex. Figure A-5 shows the dimensions of ER's Receiving Area, Storage Area, and Concrete Approach Aprons.

A-2b PCB Treatment and Disposal Facilities

PCB's are neither treated nor disposed of on this site. ER services both large and small generators of PCB wastes. ER accepts only those PCB wastes which are within its storage and handling abilities.

A-2c Hazardous Waste Management Units

The only hazardous wastes managed at ER are those wastes generated on-site and regulated under the provisions of 40 CFR 260-268 mercury powder from lamp recycling. **ER is approved to store Hazardous Waste lamps prior to processing in two designated areas located within the facility.** ~~No hazardous wastes will be managed in the ER Commercial PCB Storage Area.~~

A-2d Other Buildings

No other buildings are located on ER property.

A-2e 100-Year Floodplain

The ER facility is not located within the boundaries of a 100-year flood plain. The ER area is rated as industrial/commercial.

A-2f Adjacent Surface Waters

There are no surface waters or wetlands in the immediate vicinity of the ER complex. The nearest creek is located over one mile from ER.

A-2g Surrounding Land Uses

The surrounding land uses are industrial/commercial.

A-2h Other Key Topographic Features and Other Structures

The land occupied to the east of ER is owned by ~~AG-Chem a farm equipment supplier~~. **Wood County Bandag, a vehicle tire distributor**. The property to the immediate south is a ~~vacant and ready for development~~ **rented storage warehouse for a local business**. The property to the west is ~~vacant ready for development~~. **Absorbents Products Company Inc**. The property to the immediate north is occupied by Sandusky Electric an electrical supply house.

A-2i Underground Storage Tanks

NONE

A-2j Wind Rose

The prevailing winds are southwest.

A-2k Traffic Patterns, Access and Internal Roads

Access to ER is from the I-75 interstate exit ~~161~~ **181** (Bowling Green exit). Dunbridge Road is to the East of the interstate. Heading ~~south~~ **North** on Dunbridge Road to Woodbridge industrial park entrance (east). Leading to East Woodland Circle. This area is zoned industrial/commercial.

A-2l Security Systems

The building is monitored 24/hour by an independent security/fire company. The company is ~~Techni-Guard Alarm & Signal, Inc~~ **Habitec Security**.

A-2m Closed PCB Waste Management Units

No areas are ~~open or~~ closed for PCB waste management at this time.

A-2n Fire Control Facilities

Heat sensors are located throughout the warehouse/receiving area. Smoke detectors are located in the separate office areas. All fire systems are monitored 24/hours. Fire extinguishers are located throughout the entire structure.

.

A-3 ENVIRONMENTAL CONDITIONS OF THE SITE

ER's Commercial PCB Storage Facility is located within the ER complex. All incoming and outgoing PCB's will be loaded and unloaded within the confines of the specially designed, contained *PCB Receiving and Storage Area* (see Figure A-4, Appendix A.I). The *PCB Storage Area* is designed with spill-control features and equipment to contain and remove any spills or leaks and has a total containment capacity of 6270 gallons.

ER is located within the Woodbridge Industrial Park, Bowling Green, OH. There are no drains within the ER Commercial PCB Storage Facility leading to the storm-water or sewerage systems. Storm-water catchbasins are located on the east side of the facility

PCB wastes will be handled and stored within the totally covered and contained ER Commercial PCB Storage Facility. The design of ER Commercial PCB Storage Facility, the handling and storage practices, and the employee training programs ensure that a release of PCB's into the environment is unlikely.

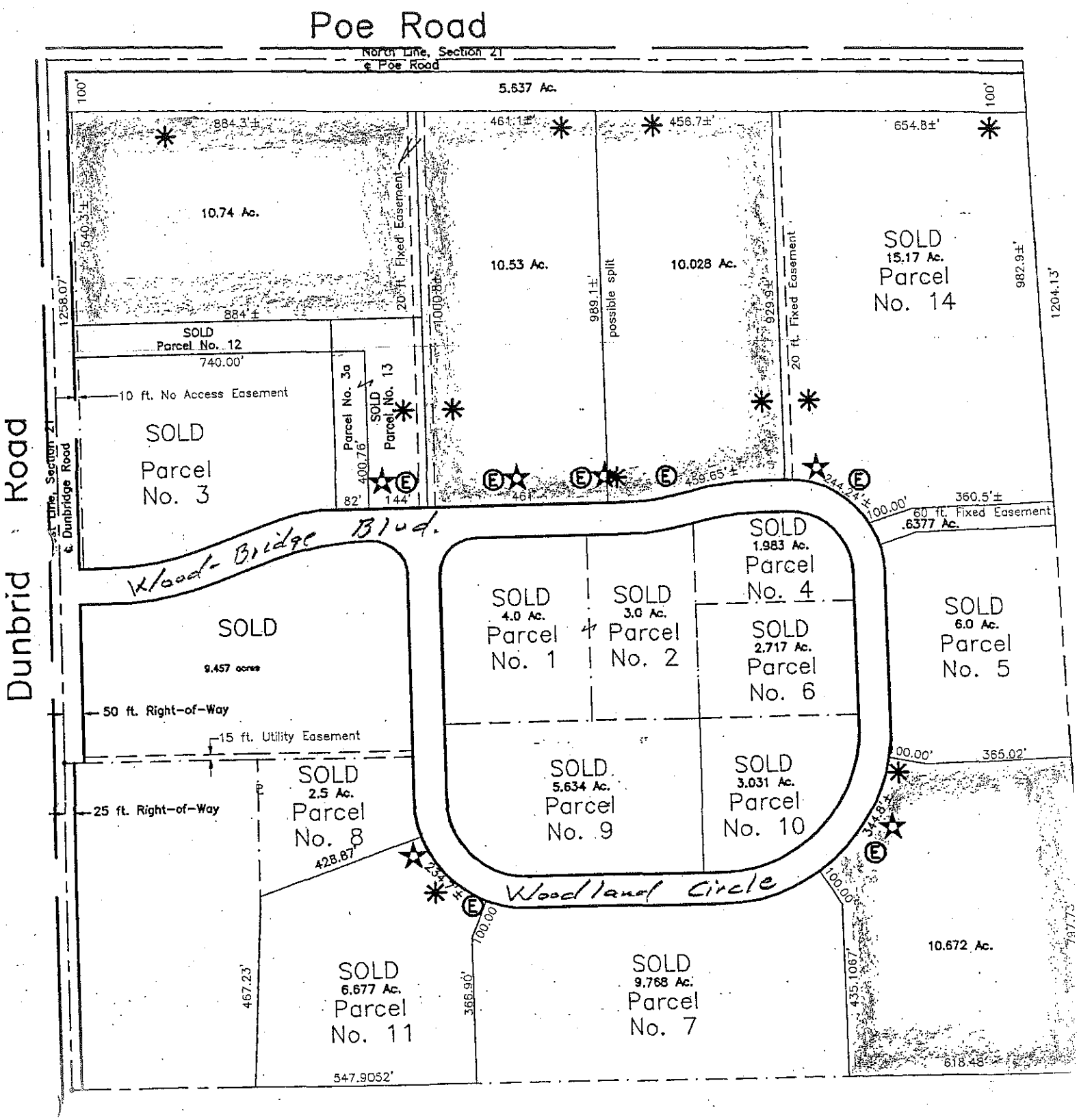
There are no agricultural lands, animal grazing lands, or large commercial vegetable gardens within a 1.0-mile radius of the ER facility.

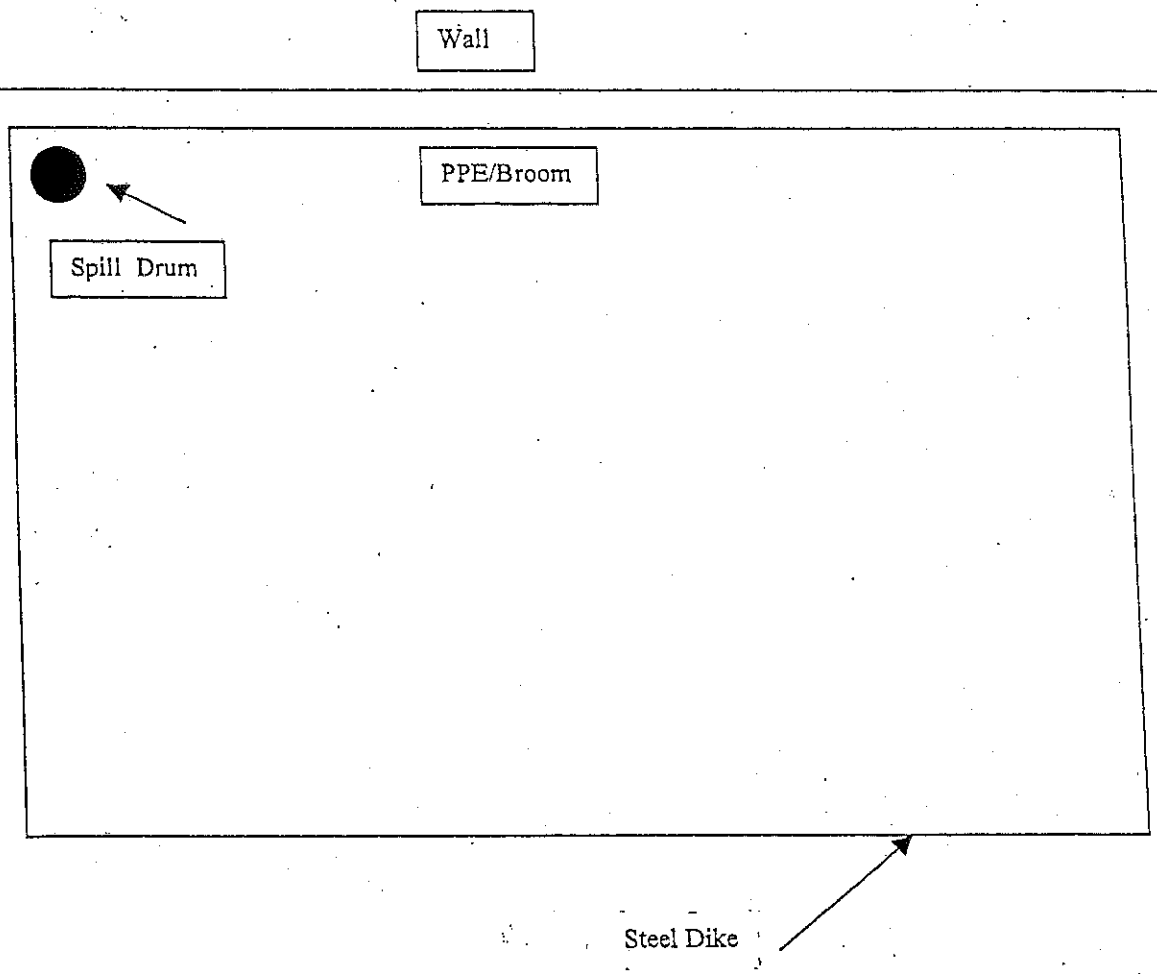
A-4 REJECTED LOADS

Rejected loads will be handled in accordance with the procedures outlined in Appendix A.II

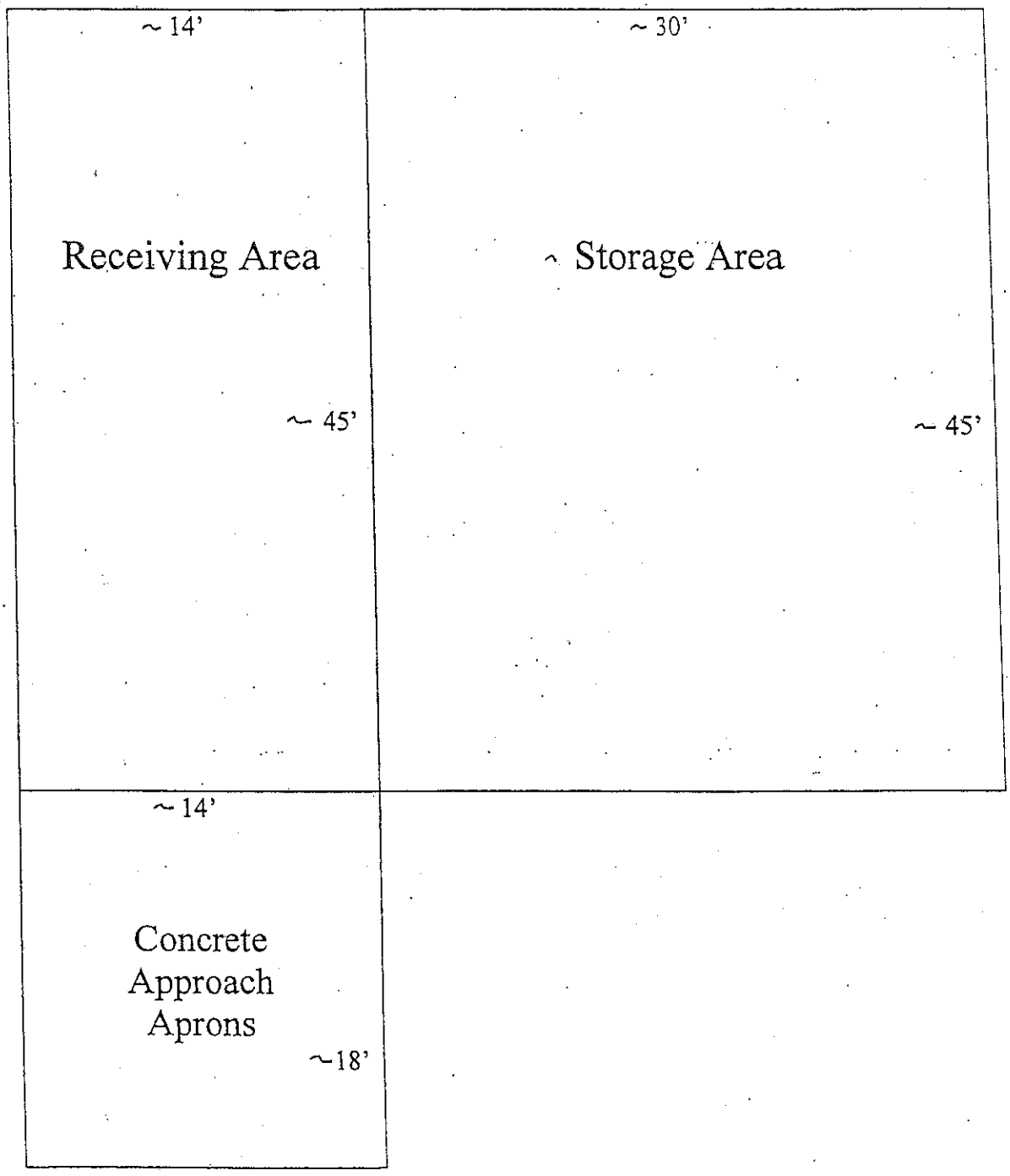
APPENDIX A.I

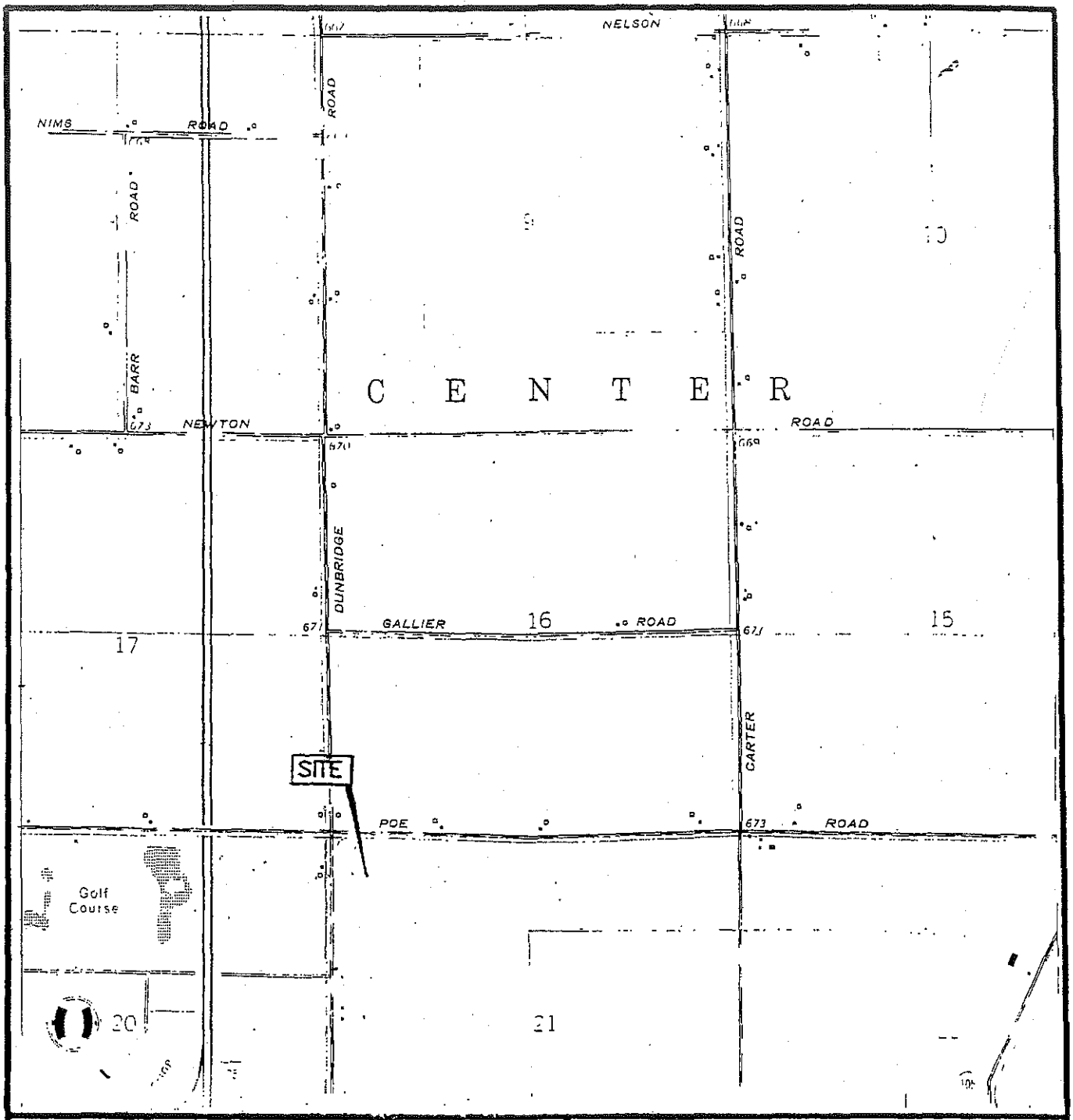
FIGURES


Poe Road
North Line, Section 21
℄ Poe Road
5.637 Ac.
100'
100'
884.3'±
461.1'±
456.7'±
654.8'±
10.74 Ac.
540.3'±
1258.07'
884'±
20 ft. Fixed Easement
10.53 Ac.
10.028 Ac.
989.1'±
possible split
929.9'±
20 ft. Fixed Easement
SOLD
15.17 Ac.
Parcel
No. 14
982.9'±
1204.13'
SOLD
Parcel No. 12
740.00'
10 ft. No Access Easement
SOLD
Parcel
No. 3
Parcel No. 3a
SOLD
Parcel No. 13
400.76'
82'
144'
461'
459.65'±
244.74'±
100.00'
360.5'±
60 ft. Fixed Easement
.6377 Ac.
Dunbridge Road
℄ Dunbridge Road
Wood-Bridge Blvd.
SOLD
4.0 Ac.
Parcel
No. 1
SOLD
3.0 Ac.
Parcel
No. 2
SOLD
1.983 Ac.
Parcel
No. 4
SOLD
2.717 Ac.
Parcel
No. 6
SOLD
6.0 Ac.
Parcel
No. 5
SOLD
9.457 acres
50 ft. Right-of-Way
15 ft. Utility Easement
SOLD
5.634 Ac.
Parcel
No. 9
SOLD
3.031 Ac.
Parcel
No. 10
00.00'
365.02'
25 ft. Right-of-Way
SOLD
2.5 Ac.
Parcel
No. 8
428.87'
344.8'±
Woodland Circle
100.00'
100.00'
10.672 Ac.
435.1067'
467.23'
SOLD
6.677 Ac.
Parcel
No. 11
366.90'
SOLD
9.768 Ac.
Parcel
No. 7
618.48'
547.9052'



Storage, Receiving, and Concrete Approach Apron Areas





APPROXIMATE SCALE – FEET

0 2000 4000

N

OHIO

REFERENCE
USGS 7.5 MIN TOPOGRAPHIC QUADRANGLE.
DUNBRIDGE, OHIO QUADRANGLE
DATED 1958, PHOTOREVISED 1968
SCALE 1 : 2000

FIGURE 1.0
SITE LOCATION MAP

100 ACRES DUNBRIDGE INDUSTRIAL PARK
BOWLING GREEN, OHIO

PREPARED FOR
BOWLING GREEN COMMUNITY DEVELOPMENT FOUNDATION
BOWLING GREEN, OHIO

DRAWN KKR/1-17-96	CHECKED CAB
REVISED	APPROVED ATO
JOB NO. 33066.01	
DRAWING NUMBER 330661	

TOLEDO INC.

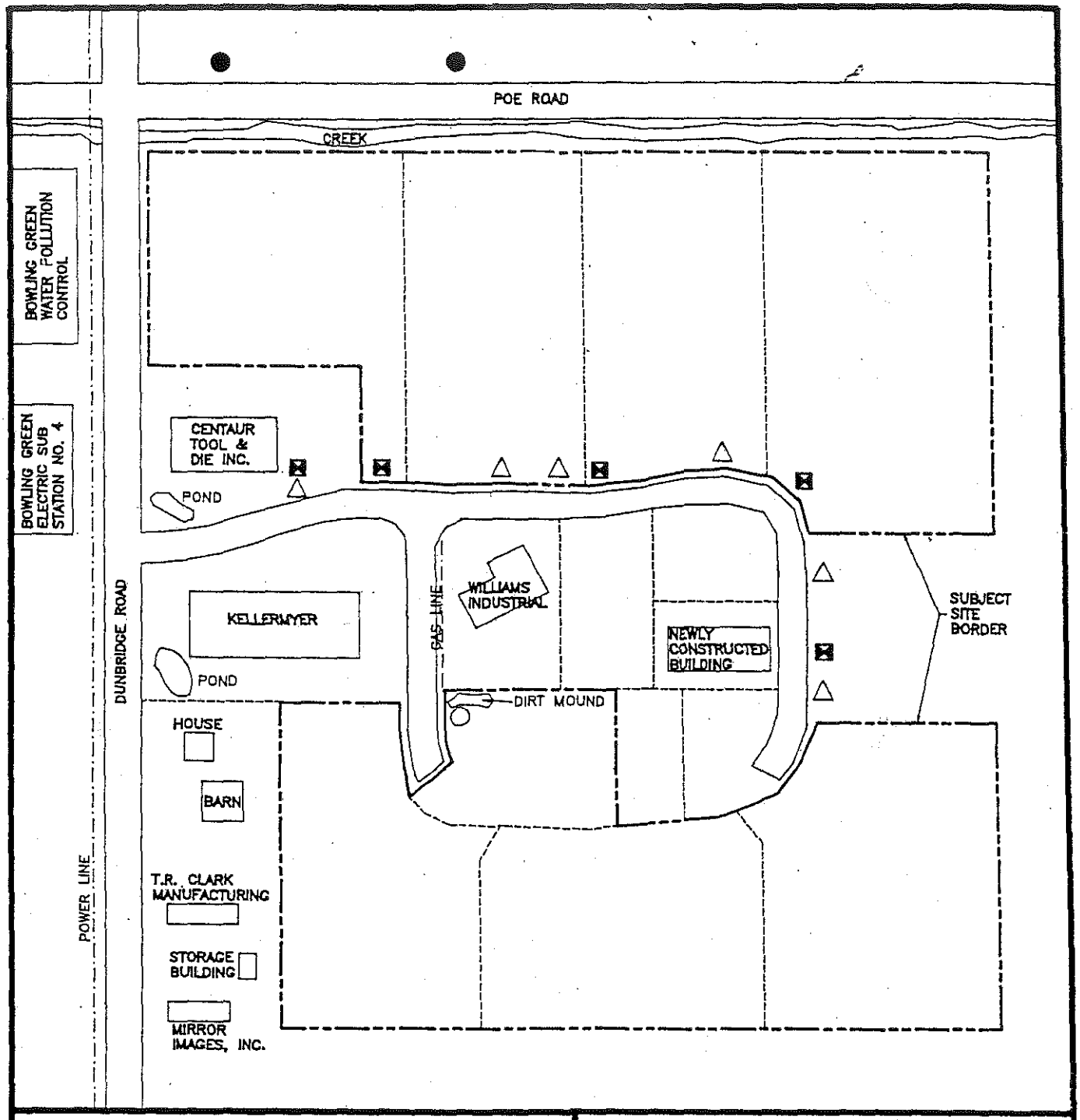


FIGURE 2.0
DETAILED SITE PLAN

100 ACRES DUNBRIDGE INDUSTRIAL PARK
BOWLING GREEN, OHIO

PREPARED FOR
BOWLING GREEN COMMUNITY DEVELOPMENT FOUNDATION
BOWLING GREEN, OHIO

DRAWN KKR/1-17-96	CHECKED CB
REVISED	APPROVED ATB
JOB NO. 33066.01	
DRAWING NUMBER 330662	TOLEDO, INC.

APPENDIX A.II

REJECTED LOAD PROCEDURES

REJECTED LOAD PROCEDURES

Commercial PCB TSD's Responsibilities

1. Totally Rejected Load

   (a). Note reason for rejection in Item 19 of the manifest along with date and signature.

   (b). Do not sign Item 20.

   (c). Remove Commercial PCB TSD copy and return remaining copies of the manifest to the transporter.

2. Partially Rejected Load

   (a). Permission of the generator must be obtained and documented to partially reject a load.

   (b). The reason for rejection, quantity rejected and generator contact name granting permission must be refereneed in Item 19.

   (c). Item 13* is lined out and new quantity inserted to reflect the quantity accepted.

   (d). Item 20 is completed.

   (e). Distribute manifest copies as per accepted load.

   (* Must alter to ensure change is noted by Keypunch)

Transporter's Responsibilities

1. Totally Rejected Load

   (a). If an alternate disposal facility is available, contact the generator to obtain permission to designate a new facility.

   (b). If permission is obtained, alter the manifest as follows:

   (i). Item 9/10 - simply line out originally designated facility and replace with new facility information.

   (ii). Note in Item 19 permission granted by generator, contact name, date and transporter signature.

(c). Transport to newly designated Commercial PCB TSDF for acceptance.

(d). The Commercial PCB TSDF will need to be provided with an additional manifest copy since the Commercial PCB TSDF which originally rejected the load removed the Commercial PCB TSDF copy.

(e). If no alternative disposal facility is available, return the load to the generator and obtain the generator's signature and date in Item 19, acknowledging the returned load.

(f). Remove transporter's copy of manifest.

2. Partially Rejected Loads

(a). If no alternate disposal facility is possible, return the load to the generator. Loads returned to the generator must be signed and dated by the generator in Item 19, acknowledging receipt. The only copy of the manifest the transporter will have is the transporter's copy.

(b). If an alternate disposal facility is possible, contact the generator to obtain permission to designate a new facility.

(c). If permission is obtained, the transporter acting as an authorized contractor for the generator, prepares a new manifest as follows:

(i). Indicate the more appropriate US DOT description/waste code if determined by the rejection.

(ii). Item 13 indicates the quantity originally rejected.

(iii). The original manifest number and date of rejection is to be noted in Item 19.

(iv). The new Commercial PCB TSD information is to be completed.

(v). The generator's name authorizing the Commercial PCB TSDF is to be clearly printed in the generator's line and verified by having the driver sign on the generator's line. The date of the generator's approval must also be placed on the generator's line.

(vi). The remainder of the manifest is to be completed as appropriate with the information supplied on the original

manifest. The generator's first copy and the STATE first copy of the manifest are to be returned to the generator.

(vii). The generator has the option of providing a replacement manifest with an original generator's signature. The replacement manifest must contain in Item 19, the original manifest number and date of rejection. (It should be noted that the transporter's copy for a partially rejected load is the shipping document only authorizing the return of the waste to the generator.)

Generator's Responsibilities

1. Totally Rejected Loads

(a). Permission may be granted to the transporter to designate an alternate disposal facility.

(b). Loads returned to the generator must be signed and dated by the generator in Item 19, acknowledging receipt.

(c). The transporter's manifest copy given to the transporter and the State second copy are mailed to the Department.

(d). Returned rejected loads when sent out for subsequent disposal must have the original manifest number and date of the rejection noted in Item 19 of the new manifest.

2. Partially Rejected Loads

(a). Permission must be granted by the Commercial *PCB TSDF* to accept/reject partial loads.

(b). For a load returned to the generator:

(i). The manifest returned to the generator must be signed and dated by the generator in Item 19, acknowledging receipt.

(ii). The transporter's manifest copy is given to the transporter and the State first and second copies are mailed to the Department.

(c). There are two options to designate an alternate disposal facility:

(i). Option 1

~~(a). Provide a new manifest to the transporter for shipment of the load to the designated facility.~~

~~(b). Returned rejected loads when sent out for subsequent disposal must have the original manifest number and the date of the rejection noted in Item 19 on the new manifest.~~

~~(c). Follow normal manifest distribution.~~

~~(ii). Option 2~~

~~(a). Designate the transporter to prepare a new manifest with the information specified in the section "Transporter - Partially Rejected Load 2 (c).~~

~~(b). The generator's first copy and the State first copy of the manifest are to be returned to the generator by the transporter. The State first copy must be mailed to the Department.~~

Rejected Load Procedures

The regulations can be found in 40 CFR under; Section 263.21 Compliance with the manifest, Section 264.72; Manifest discrepancies and Section 265.72 Manifest discrepancies.

Sec. 264.72 Manifest discrepancies.

(a) Manifest discrepancies are:
(1) Significant differences (as defined by paragraph (b) of this section) between the quantity or type of hazardous waste designated on the manifest or shipping paper, and the quantity and type of hazardous waste a facility actually receives;
(2) Rejected wastes, which may be a full or partial shipment of hazardous waste that the TSDF cannot accept; or
(3) Container residues, which are residues that exceed the quantity limits for "empty" containers set forth in 40 CFR 261.7(b).
(b) Significant differences in quantity are: For bulk waste, variations greater than 10 percent in weight; for batch waste, any variation in piece count, such as a discrepancy of one drum in a truckload. Significant differences in type are obvious differences which can be discovered by inspection or waste analysis, such as waste solvent substituted for waste acid, or toxic constituents not reported on the manifest or shipping paper.
(c) Upon discovering a significant difference in quantity or type, the owner or operator must attempt to reconcile the discrepancy with the waste generator or transporter (e.g., with telephone conversations). If the discrepancy is not resolved within 15 days after

receiving the waste, the owner or operator must immediately submit to the Regional Administrator a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest or shipping paper at issue.

(d)(1) Upon rejecting waste or identifying a container residue that exceeds the quantity limits for "empty" containers set forth in 40 CFR 261.7(b), the facility must consult with the generator prior to forwarding the waste to another facility that can manage the waste. If it is impossible to locate an alternative facility that can receive the waste, the facility may return the rejected waste or residue to the generator. The facility must send the waste to the alternative facility or to the generator within 60 days of the rejection or the container residue identification.

(2) While the facility is making arrangements for forwarding rejected wastes or residues to another facility under this section, it must ensure that either the delivering transporter retains custody of the waste, or, the facility must provide for secure, temporary custody of the waste, pending delivery of the waste to the first transporter designated on the manifest prepared under paragraph (e) or (f) of this section.

(e) Except as provided in paragraph (e)(7) of this section, for full or partial load rejections and residues that are to be sent off-site to an alternate facility, the facility is required to prepare a new manifest in accordance with Sec. 262.20(a) of this chapter and the following instructions:

(1) Write the generator's U.S. EPA ID number in Item 1 of the new manifest. Write the generator's name and mailing address in Item 5 of the new manifest. If the mailing address is different from the generator's site address, then write the generator's site address in the designated space for Item 5.

(2) Write the name of the alternate designated facility and the facility's U.S. EPA ID number in the designated facility block (Item 8) of the new manifest.

(3) Copy the manifest tracking number found in Item 4 of the old manifest to the Special Handling and Additional Information Block of the new manifest, and indicate that the shipment is a residue or rejected waste from the previous shipment.

(4) Copy the manifest tracking number found in Item 4 of the new manifest to the manifest reference number line in the Discrepancy Block of the old manifest (Item 18a) of this chapter.

(5) Write the DOT description for the rejected load or the residue in Item 9 (U.S. DOT Description) of the new manifest and write the container types, quantity, and volume(s) of waste.

(6) Sign the Generator's/Offeror's Certification to certify, as the offeror of the shipment, that the waste has been properly packaged, marked and labeled and is in proper condition for transportation.

(7) For full load rejections that are made while the transporter remains present at the facility, the facility may forward the rejected shipment to the alternate facility by completing Item 18b of the original manifest and supplying the information on the next destination facility in the Alternate Facility space. The facility must retain a copy of this manifest for its records, and then give the remaining copies of the manifest to the transporter to accompany the shipment. If the original manifest is not used, then the facility must use a new manifest and comply with paragraphs (e)(1), (2), (3), (4), (5), and (6) of this section.

(f) Except as provided in paragraph (f)(7) of this section, for rejected wastes and residues that must be sent back to the generator, the facility is required to prepare a new manifest in accordance with Sec. 262.20(a) of this chapter and the following instructions:

(1) Write the facility's U.S. EPA ID number in Item 1 of the new manifest. Write the generator's name and mailing address in Item 5 of the new manifest. If the mailing address is different from the generator's site address, then write the generator's site address in the designated space for Item 5.
(2) Write the name of the initial generator and the generator's U.S. EPA ID number in the designated facility block (Item 8) of the new manifest.
(3) Copy the manifest tracking number found in Item 4 of the old manifest to the Special Handling and Additional Information Block of the new manifest, and indicate that the shipment is a residue or rejected waste from the previous shipment.
(4) Copy the manifest tracking number found in Item 4 of the new manifest to the manifest reference number line in the Discrepancy Block of the old manifest (Item 18a).
(5) Write the DOT description for the rejected load or the residue in Item 9 (U.S. DOT Description) of the new manifest and write the container types, quantity, and volume(s) of waste.
(6) Sign the Generator's/Offeror's Certification to certify, as offeror of the shipment, that the waste has been properly packaged, marked and labeled and is in proper condition for transportation.
(7) For full load rejections that are made while the transporter remains at the facility, the facility may return the shipment to the generator with the original manifest by completing Item 18a and 18b of the manifest and supplying the generator's information in the Alternate Facility space. The facility must retain a copy for its records and then give the remaining copies of the manifest to the transporter to accompany the shipment. If the original manifest is not used, then the facility must use a new manifest and comply with paragraphs (f)(1), (2), (3), (4), (5), and (6) of this section.
(g) If a facility rejects a waste or identifies a container residue that exceeds the quantity limits for "empty" containers set forth in 40 CFR 261.7(b) after it has signed, dated, and returned a copy of the manifest to the delivering transporter or to the generator, the facility must amend its copy of the manifest to indicate the rejected wastes or residues in the discrepancy space of the amended manifest. The facility must also copy the manifest tracking number from Item 4 of the new manifest to the Discrepancy space of the amended manifest, and must re-sign and date the manifest to certify to the information as amended. The facility must retain the amended manifest for at least three years from the date of amendment, and must within 30 days, send a copy of the amended manifest to the transporter and generator that received copies prior to their being amended.

SECTION B

FACILITY DESIGN QUALIFICATIONS

The information provided in this section is submitted in accordance with the requirements of 40 CFR 761.65(b) and with the criteria provided in the TSCA Guidance Manual For Commercial PCB Storage Facility Applications. This section provides the details of specifications including the size and dimensions of the storage areas, design capacity, and containment systems.

TABLE OF CONTENTS

LIST OF FIGURES

Figure

APPENDICES

B-1 INTRODUCTION

ER services both the large- and small-quantity PCB waste generator and will accept only PCB materials/equipment which are within its storage and handling abilities. ER maintains PCB-dedicated DOT containers for shipping and storing PCB solids/liquids.

Environmental Recycling, a fluorescent light recycling facility operated by experts in the Chemical, Environmental, Civil Engineering fields remodeled an existing storage area within the ER complex into the ER Commercial PCB Storage Facility. All floor and wall joints and all floor and curb joints were constructed in accordance with good engineering practices to provide continuous smooth impervious joints. All floor, curb, and wall surfaces were sealed prior to the storage of any PCB materials and have been maintained in an excellent condition since its first construction. The PCB storage area is contained by a nine-inch plate steel dike/sealed at the base and joints along with the interior and exterior flooring with chemical resistant epoxy. The area being used for PCB storage and receiving areas is one (1) continuous pour of portland cement a mixture of tricalcium silicate, tricalcium aluminate, and dicalcium silicate these active compounds ultimately crystallize and bind together the particles of sand and stone that make up concrete. This mixture has an inherent resistance to caustic substances. The area was then covered with multipurpose chemical resistant epoxy. The epoxy was smoothed over the entire floor creating a continuous unbroken epoxy layer. This forms an epoxy membrane that penetrates the concrete floor to 30 mils creating a chemical and PCB resistant layer. This barrier will not allow PCB oils and other chemicals to penetrate and soak into the concrete. Next bolt anchors were set into the concrete and filled with epoxy. The cement again was sealed around the bolts to grade and no area was left unsealed. A second layer was of epoxy was added creating a 50 mil seal around all bolts. A six (6) inch angle steel dike was welded, and placed over the concrete and bolts. The steel dike has a continuous weld in all areas of joining. The area surrounding the steel and bolt was filled in with epoxy and the entire steel angle dike was sealed to the floor and all welded joints covered with epoxy. This created an additional 30 mils forming a continuous smooth chemical PCB epoxy seal between the dike, floor and welded seams in the steel dike. The entire dike, floor and welded seams in the steel dike. All provide a continuous smooth impervious containment area.

Figure B-1, Appendix B.I is a site location map. Figure B-2, Appendix B.I is a site plan and provides an overview of the ER Commercial PCB Storage Facility in relationship to the rest of the ER building complex. Figure B-3, Appendix B.I provides specific details on the ER Commercial PCB Storage Facility.

B-2 COMMERCIAL PCB STORAGE FACILITY

The 40'-5"-foot by 27'-8"-foot by 9" Commercial PCB Storage Facility has been carefully designed and engineered for the full protection of the PCB materials stored within the area and for the safety of the employees and the environment.

The ER Commercial PCB Storage Facility is housed entirely within the roof and walls of a steel-framed building and placed on undrained, reinforced concrete floors. There are no open floor drains in the ER Commercial PCB Storage Facility or within the entire warehouse area.

As mentioned in Section C, the ER Commercial PCB Storage Facility is protected by special security arrangements. The PCB area is protected by a Security System, which also serves the remainder of the ER complex.

All access ways to the Commercial PCB Storage Facility area will be placarded with yellow and black "PCB Caution" placards. Signs posted at entry ways warn, "Authorized Personnel Only!"

An eyewash fountain is centrally located by the PCB storage area. A first-aid kit is located on the east wall near the work desk. Lockers containing safety equipment and disposal clothing are located on the east wall. The equipment includes air-purifying respirators, chemical-resistant coveralls, hard hats, chemical-resistant over boots and gloves, safety glasses, goggles, and full-face shields.

Dry-chemical ABC-type fire extinguishers are located in the area and are monitored weekly via "quick check" for readiness. Sorbent pads and floor dry are readily available in the storage area.

The ER Commercial PCB Storage Facility has been designed to provide containment for drums containing PCB Fluorescent Light Ballasts, transformers, electrical Equipment, Drums of PCB Oil. Not to exceed 4900 gallons at one time. Even though the containment area will contain 6270 gallons.

ER utilizes a computer rules and inventory "package" which regulates storage acceptability, types, and dating. ER will only receive for storage PCB materials which ER is confident it can move out for final disposal within 30 days from the date the PCB wastes are scheduled for transportation to disposal. We are applying for a commercial storage permit in case we must store material over 30 days. In any case we will not receive more material if we are at capacity in the PCB storage area until we have shipped material from the storage area and have the additional capacity to do so. Each container received at the ER Commercial PCB Storage Facility is dated, weighed, and properly marked. PCB wastes are warehoused in a manner to permit easy inspection.

B-2a PCB Storage Area

The *PCB Storage Area* is an enclosed diked area within the ER Commercial PCB Storage Facility. This area has 9-inch-high plate steel sealed at the concrete floor on all four sides. Floor and steel joints are continuous. The floors and steel dike to a height of 9 inches are coated and sealed with a non-porous epoxy polyurethane sealer. The

containment volume for this area is 40' 5" X 27' 8" X 9" approximately 6270-gallons. The total internal volume of all containers to be stored in this area is 4900 gallons, providing a containment ratio greater than 2.0 (containment ratio = volume of containment/total internal volume of containers stored in contained area). The containment volume of this area is more than two times the volume of the largest PCB Article or PCB Container stored in this area or greater than 25 percent of the total internal volume of all PCB Articles or PCB Containers stored in this area. The steel ramp provides access for handcarts and, if required, a forklift truck. (SINCE ER WILL ONLY EXCEPT LESS THAN 4900 GALLONS AT ONE TIME THERE WOULD NEVER BE A LIQUID LEAK THAT WOULD EXCEED OR MEET OUR CONTAINMENT AREA)

All sealed steel dike/floor and sealed mitered dike/floor joints are smooth and continuous, and the area is regularly inspected to ensure that there has not been a breakdown in the integrity of the containment areas.

B-2b PCB Receiving Area

The PCB Receiving Area is enclosed on the east side by a sealed, continuous, mitered floor/cinder-wall joint. The floors are coated and sealed with a non-porous epoxy polyurethane sealer.

All sealed floor and sealed mitered wall/floor joints are smooth and continuous, and the area is regularly inspected to ensure that there has not been a breakdown in the integrity of the containment areas.

B-2c Housekeeping & Operating Practices

The entire Commercial PCB Storage area is well lighted and is kept in a very clean condition at all times. Aisle and passageways for transfer of equipment are clearly marked with painted yellow lines. The containers, brought to this facility by properly licensed vehicles, are labeled and manifested prior to pickup by ER and need only to be recorded and weighed upon arrival at the site.

The interior ER Commercial PCB Storage Facility area will be sampled annually to determine the effectiveness of work practices, inspections, and standard operating procedures. (AGAIN ER FEELS THAT CONTAMINATION IS AT THE LOWEST RISK DUE TO THE FACT THAT ER WILL ONLY RECEIVE INTACT NON-LEAKING CONTAINERS HOLDING THE PCB MATERIALS.)

B-3 SURROUNDING SOIL, PAVEMENT AND VEGETATION

The land surface immediately surrounding the ER complex buildings is paved with concrete or asphalt.

Vehicle access to the ER Commercial PCB Storage Facility is via east overhead access doors. Exterior concrete aprons abut the east asphalt-paved driveway.

B-4 EQUIPMENT

The ER Commercial PCB Storage Facility contains a work desk, first-aid cabinet, scale, spill kits, fire extinguishers, floor maintenance equipment, brooms, shovels, and an eyewash station.

All the equipment located in the ER Commercial PCB Storage Facility will be disposed of in a licensed PCB landfill at closure. Therefore, there will not be any equipment left in the ER Commercial PCB Storage Facility requiring wipe sample screening or decontamination. The equipment is one (1) drum cart, one (1) drum lifter, one (1) pallet, one (1) portable scale lifting slings two (2) to lift PCB transformer or electrical equipment and place on pallets for storage.

B-5 INSPECTIONS

Pursuant to 40 CFR Part 761.65(c)(5), all PCB Articles and PCB Containers in storage are checked for leaks at least once every 30 days, and any spill or leaked material is cleaned up immediately. Any sorbents or residue from the spill cleanup are disposed of as PCB per 40 CFR 761.60, and the leaking container is placed into a non-leaking container.

Inspections are recorded on Environmental Recycling, "PCB Storage Area Inspections Form" (see Appendix B.IV), and the completed inspection forms - complete with documentation of any corrective action - are compiled in an inspection log for future reference and for review by regulatory agencies.

B-6 CERTIFICATION

Under the civil and criminal penalties of law for making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in this section on the ER Commercial PCB Storage Facility is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and 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 and complies with 761.65(b).

Signature _____

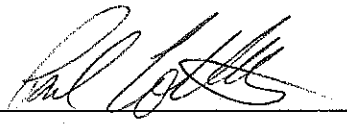
Name ~~Michael Dolkowski~~ _____

Title ~~Environmental Engineer, eecm# 5014~~ _____

Date ~~6-23-2000~~

B-6 CERTIFICATION

Under the civil and criminal penalties of law for making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in this section on the ER Commercial PCB Storage Facility is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and 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 and complies with 761.65(b).

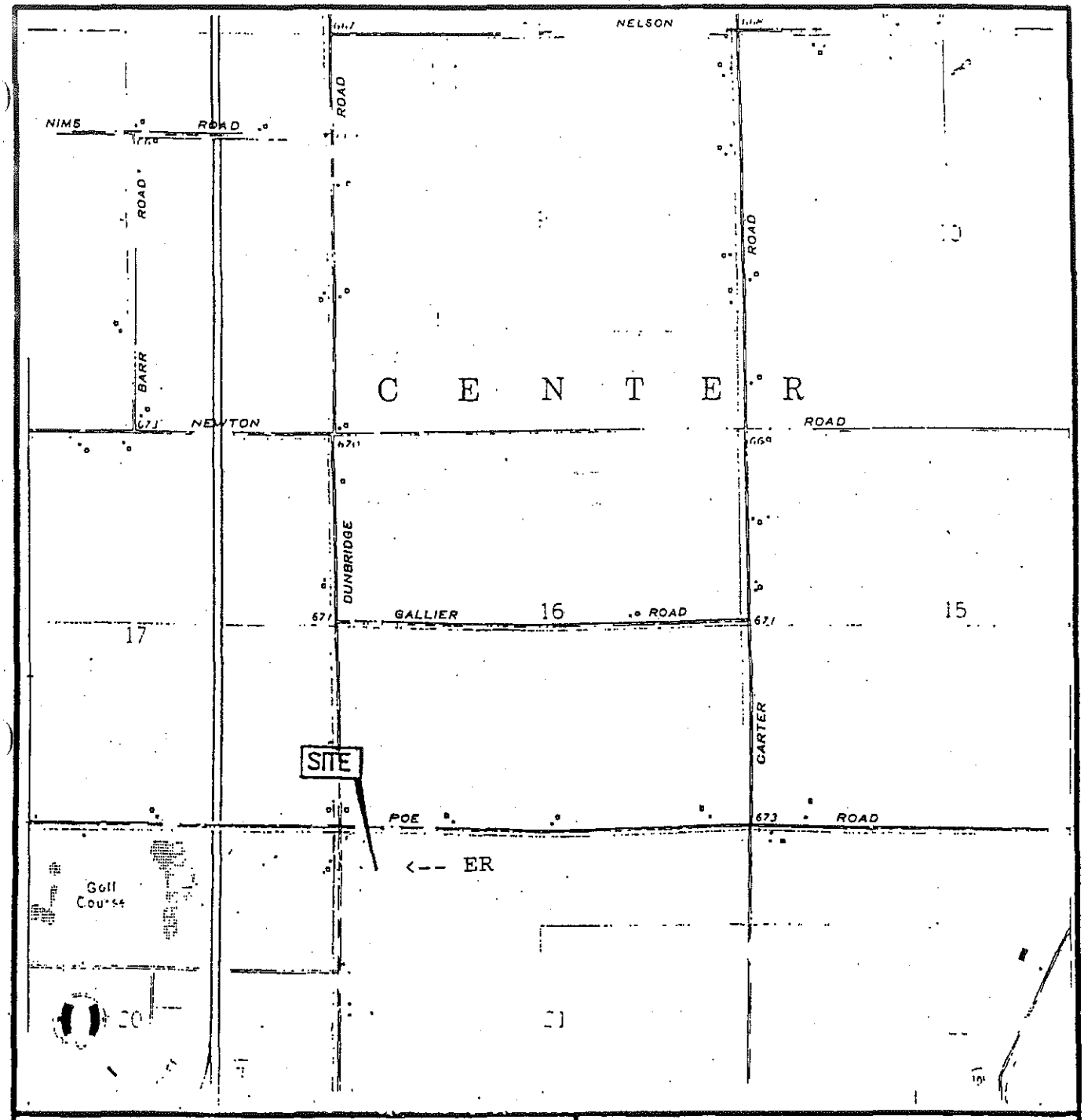
Signature 

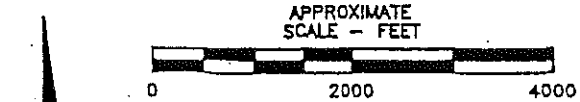
Name Paul Cottrell

Title President

Date 2/23/10

APPENDIX B.I





REFERENCE
USGS 7.5 MIN TOPOGRAPHIC QUADRANGLE.
DUNBRIDGE, OHIO QUADRANGLE
DATED 1958, PHOTOREVISED 1968
SCALE 1 : 2000

FIGURE 1.0
SITE LOCATION MAP

100 ACRES DUNBRIDGE INDUSTRIAL PARK
BOWLING GREEN, OHIO

PREPARED FOR
BOWLING GREEN COMMUNITY
DEVELOPMENT FOUNDATION
BOWLING GREEN, OHIO

DRAWN KKR/1-17-96	CHECKED CWB
REVISED	APPROVED ATD
JOB NO. 33066.01	
DRAWING NUMBER .330661	TOLEST, INC.

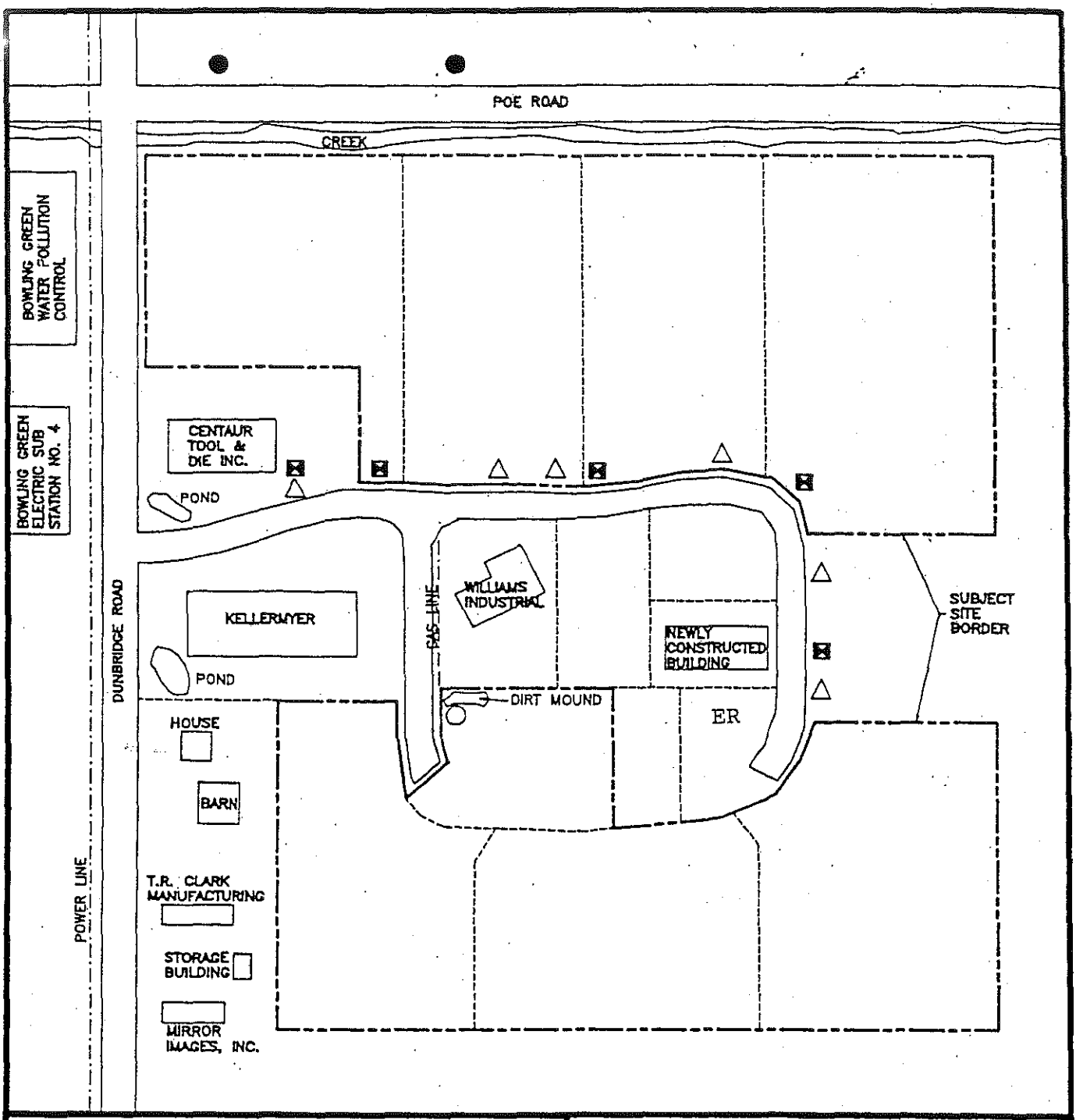


FIGURE 2.0
DETAILED SITE PLAN

100 ACRES DUNBRIDGE INDUSTRIAL PARK
BOWLING GREEN, OHIO

PREPARED FOR
BOWLING GREEN COMMUNITY DEVELOPMENT FOUNDATION
BOWLING GREEN, OHIO

DRAWN KKR/1-17-96	CHECKED CK
REVISED	APPROVED ATB
JOB NO. 33066.01	
DRAWING NUMBER 330662	TOLEDO, INC.

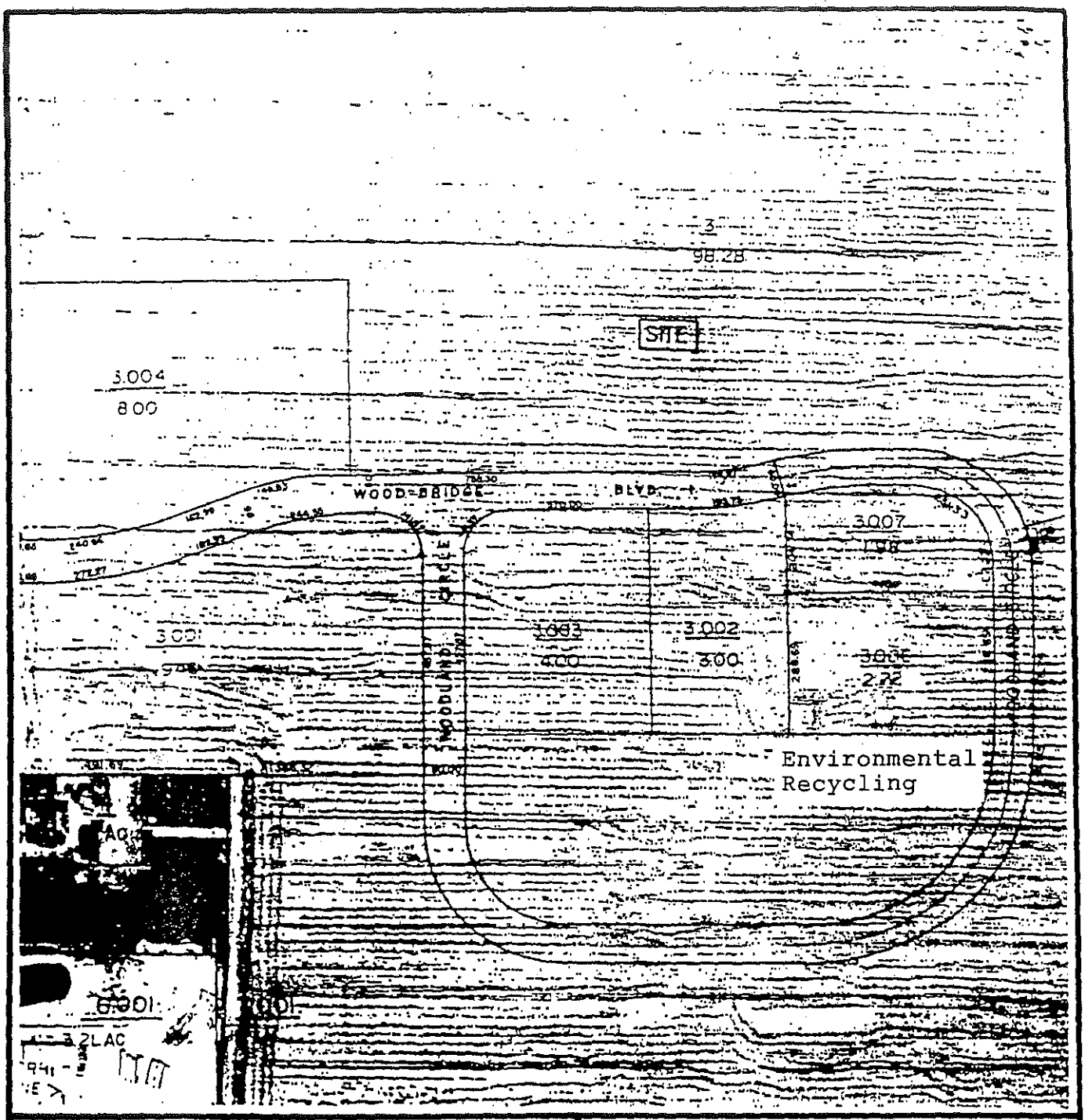


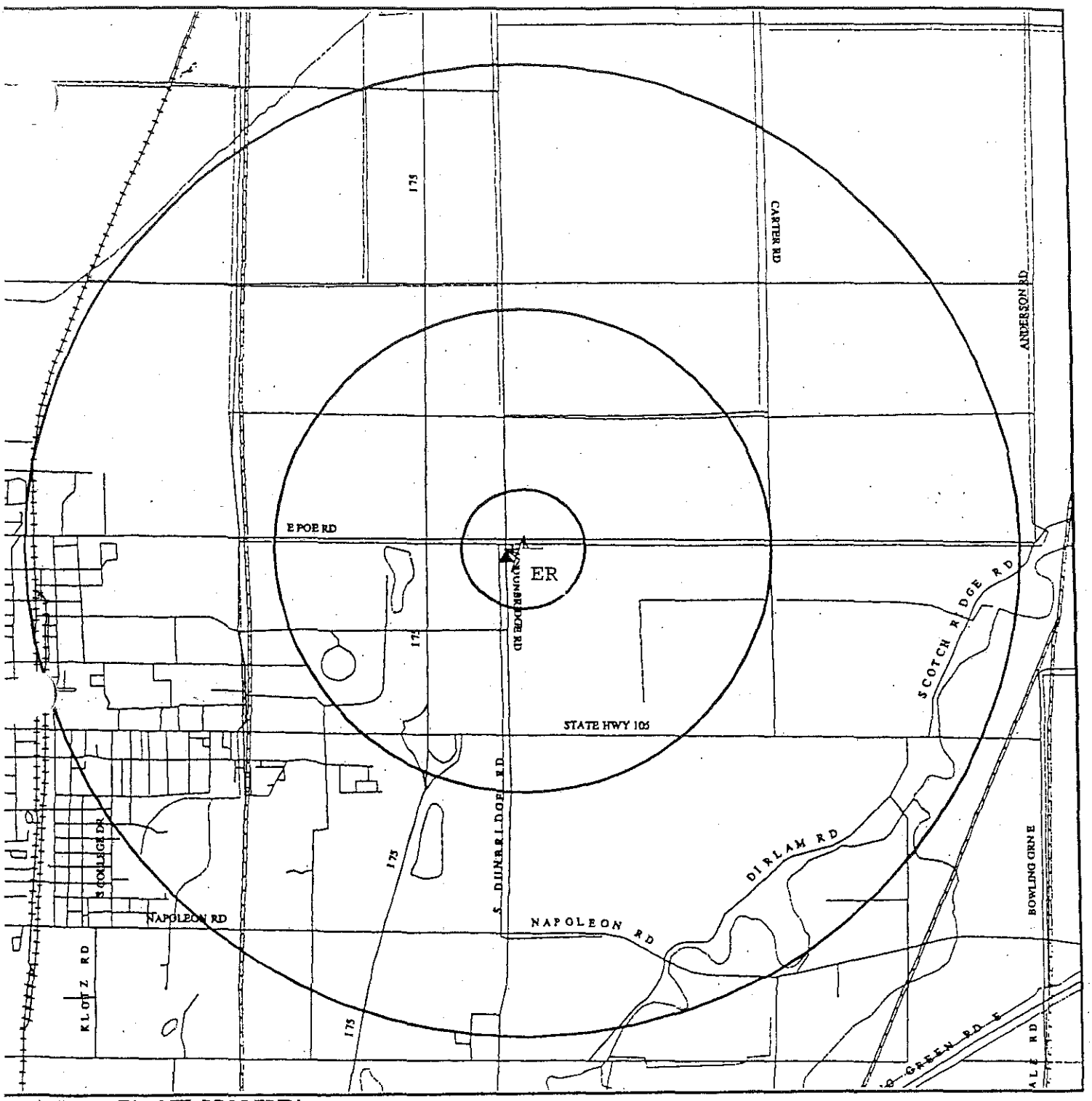
FIGURE 3.0
1987 AERIAL PHOTOGRAPH

100 ACRES DUNBRIDGE INDUSTRIAL PARK
BOWLING GREEN, OHIO

PREPARED FOR
BOWLING GREEN COMMUNITY
DEVELOPMENT FOUNDATION
BOWLING GREEN, OHIO

DRAWN KKR/1-17-96	CHECKED CAG
REVISED	APPROVED ATO
JOB NO. 33066.01	
DRAWING NUMBER 330663	TOLEDO, INC.

OVERVIEW MAP - 103746.1s - Toltest, Inc.



- Indicates TARGET PROPERTY.
- Indicates sites at elevations higher than or equal to the target property.
- Indicates sites at elevations lower than the target property.
- Coal Gasification Sites (if requested)
- National Priority List Sites

0 1/4 1/2 1 2
Miles

- Power transmission lines (USGS DLG, 1993)
- Oil & Gas pipelines (USGS DLG, 1993)

ARGET PROPERTY:	100 Acres	CUSTOMER:	Toltest, Inc.
DDRESS:	Dunbridge Industrial Park	CONTACT:	Chris Zunk
ITY/STATE/ZIP:	Bowling Green OH 43402	INQUIRY #:	103746.1s
AT/LONG:	41.3847 / 83.6089	DATE:	January 16, 1996

APPENDIX B.II

Brighton Analytical L.L.C.™

Brighton Analytical, L.L.C.
2105 Pless Drive
Brighton, Michigan 48116
Phone: (810) 229-7575 FAX: (810) 229-8650
e-mail: bai-brighton@sbcglobal.net

To: Environmental Recycling Group
P.O. Box 167
Bowling Green, OH 43402

Sample Date: 1/7/2010
Submit Date: 1/18/2010
Report Date: 1/22/2010

BA Report Number: **6874**
BA Sample ID: **BT01188**

Project Name: **Wipe Samples**
Project Number:
Sample ID: **WFD010710A Wipe FrntOffice Entrance**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1221	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1232	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1242	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1248	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1254	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1260	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1262	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1268	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
Total PCB	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
PCB wipes (extraction)	**Extracted**			3510/3550	MB	1/21/2010

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDEQ designated target detection limits (TDL).

Released by: [signature]
Date: 1/22/10

Brighton Analytical L.L.C.™
Brighton Analytical, L.L.C.
2105 Pless Drive
Brighton, Michigan 48116
Phone: (810) 229-7575 FAX: (810) 229-8650
e-mail: bai-brighton@sbcglobal.net

To: Environmental Recycling Group
P.O. Box 167
Bowling Green, OH 43402

Sample Date: 1/7/2010
Submit Date: 1/18/2010
Report Date: 1/22/2010

BA Report Number: **6874**
BA Sample ID: **BT01189**

Project Name: **Wipe Samples**
Project Number:
Sample ID: **WD010710B Wipe of Bike Floor**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1221	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1232	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1242	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1248	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1254	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1260	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1262	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1268	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
Total PCB	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
PCB wipes (extraction)	**Extracted**			3510/3550	MB	1/21/2010

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDEQ designated target detection limits (TDL).

Released by:

Date: 1/22/10

Brighton Analytical L.L.C.™
Brighton Analytical, L.L.C.
2105 Pless Drive
Brighton, Michigan 48116
Phone: (810) 229-7575 FAX: (810) 229-8650
e-mail: bai-brighton@sbcglobal.net

Sample Date: 1/7/2010
Submit Date: 1/18/2010
Report Date: 1/22/2010

To: Environmental Recycling Group
P.O. Box 167
Bowling Green, OH 43402

BA Report Number: **6874**
BA Sample ID: **BT01190**

Project Name: **Wipe Samples**
Project Number:
Sample ID: **WBR010710C Wipe Break Room Entrance**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1221	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1232	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1242	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1248	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1254	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1260	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1262	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1268	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
Total PCB	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
PCB wipes (extraction)	**Extracted**			3510/3550	MB	1/21/2010

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDEQ designated target detection limits (TDL).

Released by: [signature]
Date: 1/22/10

Brighton Analytical L.L.C.™
Brighton Analytical, L.L.C.
2105 Pless Drive
Brighton, Michigan 48116
Phone: (810) 229-7575 FAX: (810) 229-8650
e-mail: bai-brighton@sbcglobal.net

Sample Date: 1/7/2010
Submit Date: 1/18/2010
Report Date: 1/22/2010

To: Environmental Recycling Group
P.O. Box 167
Bowling Green, OH 43402

BA Report Number: **6874**
BA Sample ID: **BT01191**

Project Name: **Wipe Samples**
Project Number:
Sample ID: **WBB010710D Wipe BkBuilding Entrance**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1221	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1232	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1242	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1248	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1254	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1260	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1262	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
ARO 1268	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
Total PCB	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	1/21/2010
PCB wipes (extraction)	**Extracted**			3510/3550	MB	1/21/2010

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDEQ designated target detection limits (TDL).

Released by: [signature]
Date: 1/22/10

APPENDIX B.III

PCB Storage Daily Inspection

Date	Initials	Labeled		DOT Containers		SFDD		Closed Containers		Spills		Current Volume in Dike		Containment		Corrective Measures	
1/1/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/2/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/3/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/4/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/5/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/6/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/7/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/8/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/9/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/10/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/11/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/12/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/13/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/14/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/15/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/16/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/17/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/18/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/19/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/20/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/21/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/22/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/23/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/24/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/25/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/26/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/27/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/28/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/29/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/30/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/31/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK

ENVIRONMENTAL RECYCLING
Container inspection log

Drum Storage Area

Any evidence of leaks yes____ no____

Actions
taken_____
_____
_____

Containers labeled correctly	yes____	no___
Any evidence of leaks	yes___	no___
Any evidence of spillage	yes___	no___
Any evidence of container deterioration	yes___	no___

Actions
Taken_____
_____
_____
_____
_____

Comments_____
_____
_____

Inspected by_____ Date_____

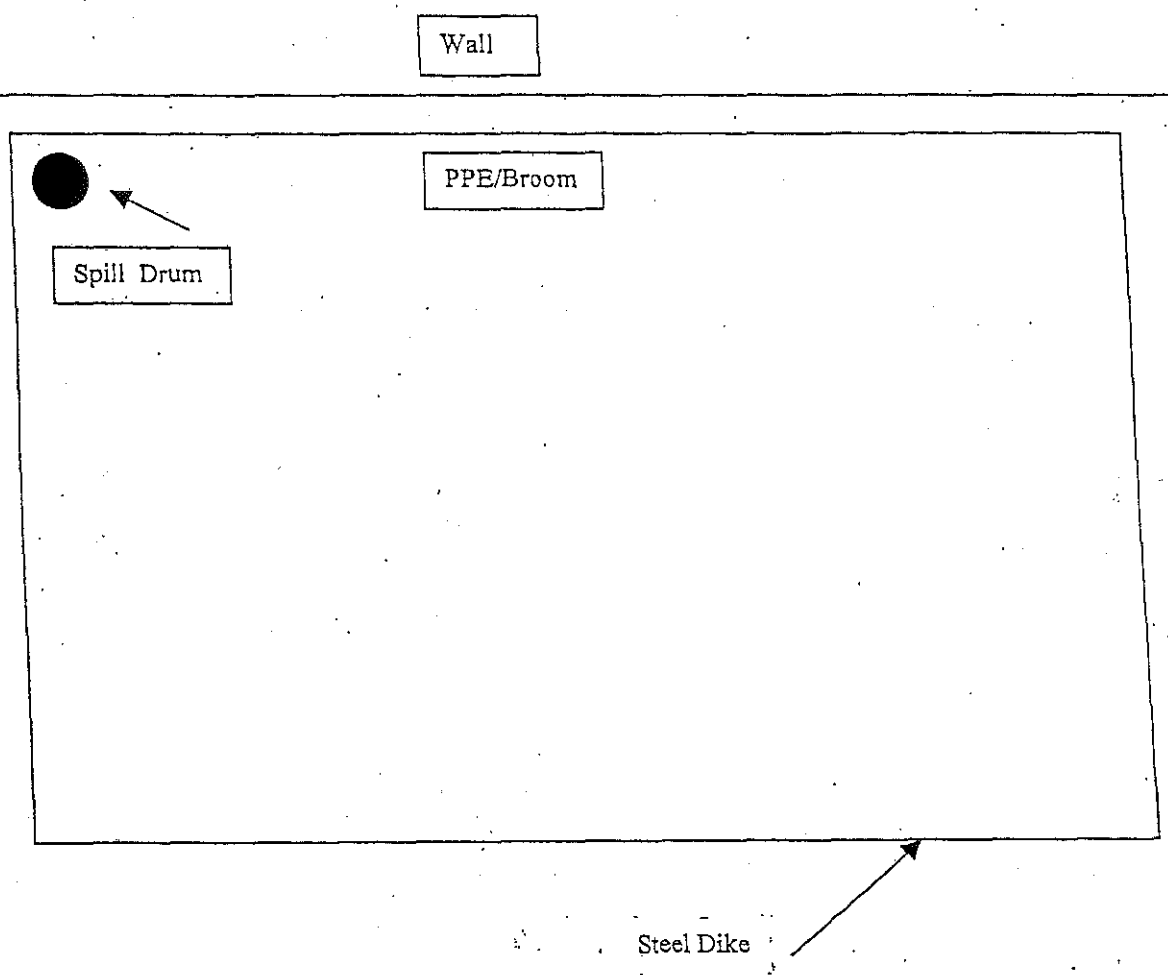
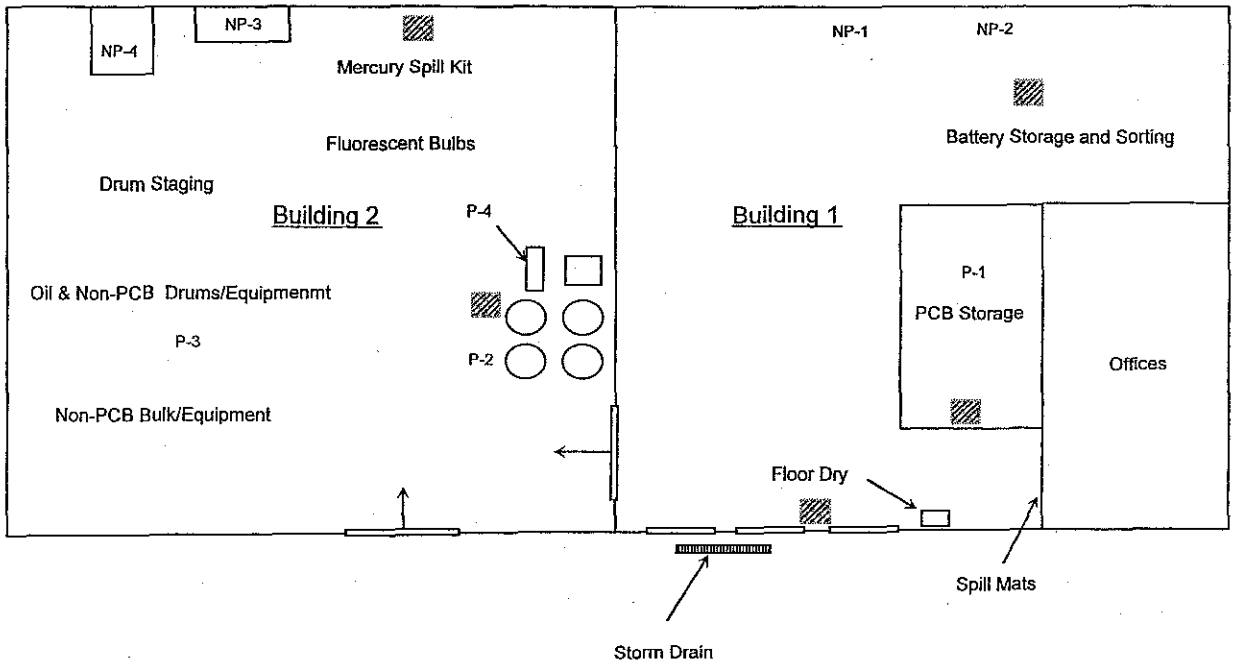
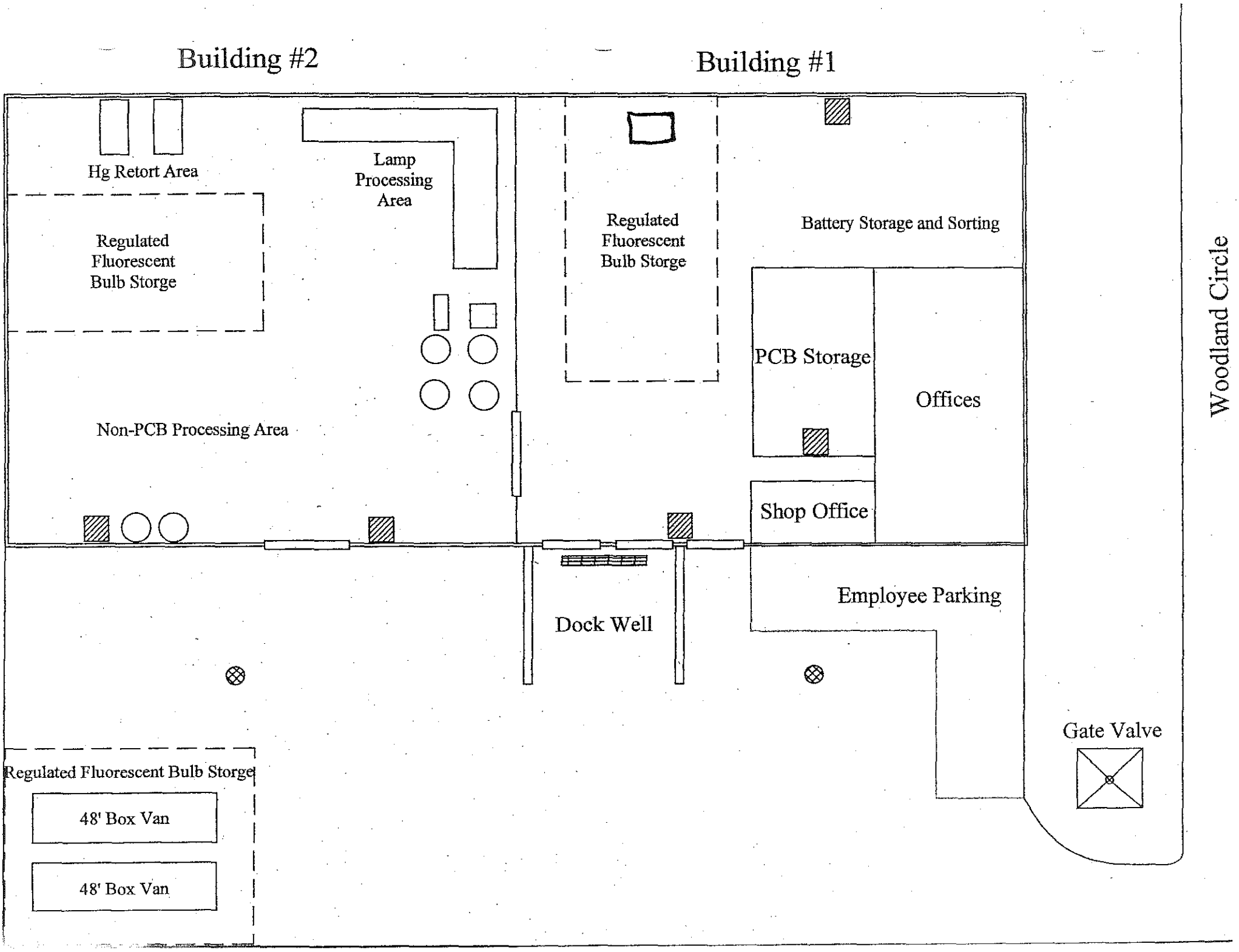


FIGURE 1
SITE PLAN
ENVIRONMENTAL RECYCLING
BOWLING GREEN, OHIO

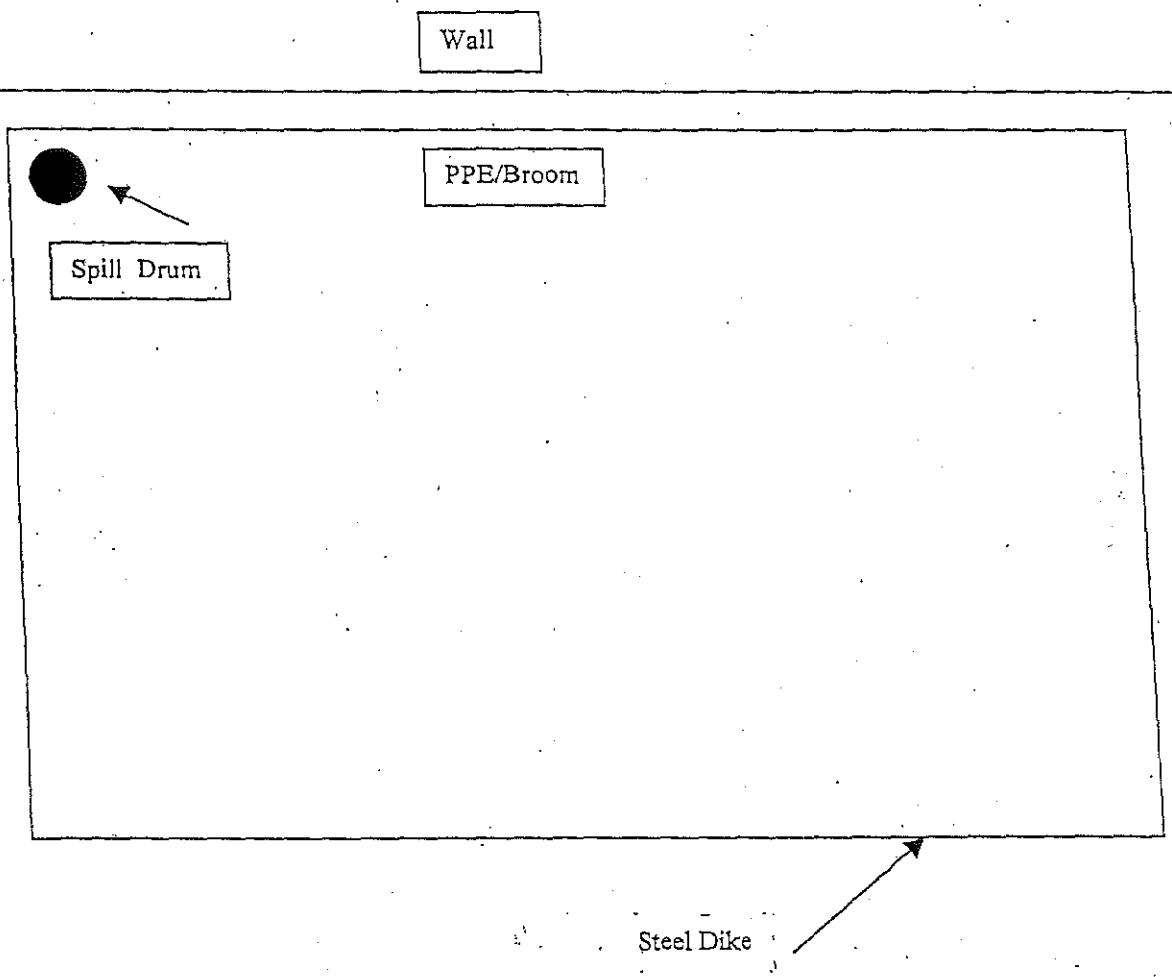
N



Spill Kit Location
P-1 Petroleum Oil Storage Location
NP-1 Non-Petroleum Oil Storage Location


Building #2
Building #1
Hg Retort Area
Lamp Processing Area
Regulated Fluorescent Bulb Storge
Regulated Fluorescent Bulb Storge
Battery Storage and Sorting
PCB Storage
Offices
Non-PCB Processing Area
Shop Office
Dock Well
Employee Parking
Gate Valve
Regulated Fluorescent Bulb Storge
48' Box Van
48' Box Van
Woodland Circle

APPENDIX B.IV



SECTION C

PROCEDURES TO PREVENT HAZARDS

The information in this section is submitted in accordance with the requirements of 40 CFR 761.65 and provides internal procedures used by Environmental Recycling (ER) to prevent hazardous conditions from occurring within the ER complex. Items discussed include: general security provisions; inspections schedule; spill prevention, containment, and countermeasures.

TABLE OF CONTENTS

APPENDIX

C-1 SECURITY

ER 24000-square-foot building complex houses the general offices, Fluorescent Lamp Recycling Facility, Universal Waste and Commercial PCB Storage Facility. During working hours, admittance to the front offices is controlled electronically by the security system. The east secured entrance is monitored by the security system and fluorescent recycling operation personnel. The ER facility complex, including the east receiving area, is locked at all times when an authorized individual is not directly present and in control. Prior to normal working hours, entrance to the facility is controlled via a key entry mode with alarm admittance secondary safety access code provided only to authorized personnel. This keyless entry intrusion/fire alarm system is serviced and monitored by ~~Techni-Guard Alarm & Signal, Inc. 24/hours~~ **Habitec Security**.

When the facility is not manned (nights, weekends, and holidays), the ER facility telephone number

(419)-354-6110

is promptly answered by a telephone answering service that has the home telephone numbers and beeper numbers of key personnel, enabling the answering service to coordinate communications.

Accesses to the Commercial PCB Storage Facility will be posted with yellow-and-black "PCB Caution" placards. In addition, accesses to the ER Commercial Storage Facility Area are posted with "Authorized Personnel Only" signs. These signs are visible from all angles of approach and are legible from a distance of 25 feet. The two, steel-door entrances to the Commercial PCB Storage Facility are always locked and require a key to gain entrance. For worker safety, the entrances (exits) can be opened from inside the PCB area by simply turning the doorknob. Door keys to the PCB area are issued only to the PCB Supervisor, the PCB Technician, and the General Manager. All visitors and/or inspectors are provided with disposable boots and, if necessary, eye protection and a hard hat when touring the facility. The foot protection is removed at the entrances/exits to prevent the movement of potential chemical contaminants into the outer environment. Tours are provided during worker break periods to avoid chemical exposures.

PCB's are delivered to this site in licensed vehicles operated by ER Equipment Technicians (drivers) or by subcontracted carriers. Subcontracted carriers are permitted access to the ER facility complex only if prior arrangements have been made with ER management personnel and if they are cleared by the ER personnel upon arrival at the facility.

C-2 SAFETY EQUIPMENT

One properly labeled, excellently maintained drum, together with a bale of sorbent pads, are located inside the PCB storage area for use as a spill kit. Bags of floor dry are also maintained in the PCB storage area to be used as an absorbent for any spills of PCB liquids. (AGAIN THE LIKELYHOOD OF THIS ACCURRING IS MINIMAL SINCE ER WILL ONLY RECEIVE INTACT NON-LEAKING CONTAINERS) Additional supplies of sorbent pads, floor dry, and other spill control equipment are available in the ER equipment warehouse area.

ER personnel all have had experience as emergency-response contractors and, as such, have all of the tools and equipment to clean up a spill in the ER Commercial PCB Storage Facility. All personnel are supplied with their own personnel protective equipment and are trained in its proper use. This equipment includes, but is not limited to:

hard hat

splash goggles

full-face shield

chemical resistant coveralls

chemical resistant shoe covers

chemical resistant gloves

air-purifying respirator

An ABC dry-chemical fire extinguishers are available in the ER Commercial PCB Storage Facility. These fire extinguishers are monitored weekly for readiness via "quick check." An eyewash station is centrally located in the PCB storage area.

An industrial first-aid kit is located on the east wall near the service desk. A locker containing safety equipment and disposable protective clothing is also located in the area.

Additional salvage drums, as needed for spill residues or for the over packing of leaking drums, are available within the complex. An intercom outside the PCB storage area provides access to the in-house public address system, contact with the front office, and access to outside phone lines.

Employees working in the in the ER Commercial PCB Storage Area are required to wear, at a minimum, safety glasses/goggles, coveralls, respirator (task specific), steel-toed shoes, and gloves.

C-3 HOUSEKEEPING and OPERATIONS PRACTICES

The ER Commercial PCB Storage Facility is well lighted and is kept in a very clean condition at all times. Aisles and passageways necessary for unobstructed movement of personnel and equipment are always maintained. PCB materials brought to this facility by properly licensed vehicles are properly labeled and manifested prior to pickup by ER vehicles or prior to delivery by subcontracted carriers. Containerized PCB wastes are recorded and weighed upon arrival at the site.

The PCB items in drums will be placed on pallets singles layer only, no stacking of material will occur. Non-leaking transformers will be placed in storage on pallets or on the dike floor area. PCB capacitors non-leaking will be placed on pallets, no stacking of materials will occur.

Surface contamination outside of the curbed/diked storage area will be monitored every three (3) months. Wipe samples will be taken from the area outside of the storage area leading to the offices and from the lunch room.

Any clothing and tools that come into direct contact with PCB's during the handling process and that cannot be decontaminated are packed in Department of Transportation (DOT) approved steel containers and are sealed, appropriately labeled, and shipped off-site for disposal.

In addition, all materials used to clean and maintain the ER Commercial PCB Storage Facility are packed either into sealed, appropriately labeled, DOT-approved steel containers or into triple-lined rolloff boxes and are shipped off-site for disposal as PCB wastes.

C-4 INSPECTIONS

Pursuant to 40 CFR Part 761.65(c)(5), all PCB Articles and PCB containers in storage are checked for leaks at least once every 30 days. (ER performs this check daily and records ~~weekly~~ **daily**.) Any spill or leaked materials are immediately cleaned up. Any sorbents or residues from the spill cleanup is properly disposed of as PCB's per 40 CFR 761.60(a)(4). Leaking containers are properly overpacked in properly marked non-leaking containers.

All inspections are recorded on a "Environmental Recycling PCB Storage Area Inspection Form" (see Appendix C.I). The completed inspection forms are compiled in the inspection log for future reference and for regulatory agency inspections. Documentation of any corrective actions taken is maintained in the inspection log.

APPENDIX C.I

PCB Storage Daily Inspection

Date	Initials	Labeled		DOT Containers		SFDD		Closed Containers		Spills		Current Volume in Dike		Containment		Corrective Measures	
1/1/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/2/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/3/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/4/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/5/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/6/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/7/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/8/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/9/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/10/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/11/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/12/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/13/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/14/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/15/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/16/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/17/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/18/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/19/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/20/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/21/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/22/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/23/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/24/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/25/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/26/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/27/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/28/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/29/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/30/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK
1/31/09		Y	N	Y	N	Y	N	Y	N	Y	N		GAL	Y	N	NONE	SEE BACK

SECTION D

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

This Spill Prevention Control and Countermeasure Plan (SPCC Plan) and is in conformance with the following:

- Clean Water Act, (CWA) 40 CFR, Part 112, as amended
- Toxic Substance Control Act, 40 CFR 761, as amended

This SPCC Plan has been prepared in accordance with the above requirements to establish the necessary planned procedures to be followed to prevent the discharge of oil (polychlorinated biphenyl's [PCB's]) into or upon the navigable waters of the United States or adjoining shorelines in such quantities as has been determined may be harmful to the public health or welfare of the United States. In addition, the SPCC Plan has been prepared in order to establish the necessary planned procedures to be followed in the event of an emergency situation at the facility such as fire; explosion; severe weather; or unplanned sudden or non-sudden release of oils (PCB's) to the air, soil, or surface water.

As required by 40 CFR 112.3 (e), 40 CFR 264.53 a copy of this SPCC Plan (and all amendments to the plan) is maintained at the facility and is available to the Regional Administrator or his representative for on-site review during normal working hours.

In addition, as required by 40 CFR 112.3 (e) a copy of this SPCC Plan (and all amendments to the plan) has been submitted to the local police department, fire department, and local emergency-response teams that may be called upon to provide emergency service.

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

ENVIRONMENTAL RECYCLING

527 East Woodland Circle

Bowling Green, OH 43402

December, 2008

TABLE OF CONTENTS

TABLE OF CONTENTS

(Continued)

1.0 INTRODUCTION:

Spill Prevention, Control, and Countermeasure (SPCC) plans for facilities are prepared and implemented as required by U.S. Environmental Protection Agency (U.S. EPA) regulations contained in Title 40, Code of Federal Regulations, Part 112 (40 CFR 112). These regulations apply to facilities gathering, storing, and consuming petroleum oil and oil products. A non-transportation related facility is subject to SPCC regulations if: the capacity of any underground storage tank (UST) exceeds 42,000 gallons (unless regulated by UST regulations) or the aggregate aboveground storage capacity exceeds 1,320 gallons; and if, due to its location, the facility could reasonably be expected to discharge oil into or upon the navigable waters of the United States.

The SPCC plan is not required to be filed with U.S. EPA, but a copy must be available for on-site review by the regional administrator during normal working hours. The SPCC plan must be submitted to the U.S. EPA Region V regional administrator and the state agency along with the other information specified in §112.4 if either of the following occurs:

1. The facility discharges more than 1,000 U.S. gallons of oil into or upon the navigable water of the United States or adjoining shorelines in a single event.
2. The facility discharges more than 42 U.S. gallons of oil into or upon the navigable water of the United States or adjoining shorelines in each of two discharges within any 12-month period.

The Reportable Quantity (RQ) for the discharge of oil including crude oil into or upon navigable waters is an amount that causes a visible film or sheen upon the surface of the water. The RQ for the release of oil into the environment, excluding navigable waters, is an amount of 25 gallons or more; and the RQ for the release of crude oil from an oil and gas extraction storage facility into the environment, excluding navigable waters, is 210 gallons.

Verbal Notification Requirement:

The verbal notification to the Bowling Green, Ohio fire department, Wood County Local Emergency Planning Committee (LEPC), and Ohio EPA shall be made within 30 minutes of knowledge of the release, unless notification within that timeframe is impractical due to uncertain circumstances. In addition, calls to The National Response Center (NRC) shall be made for those reportable quantity releases involving CERCLA hazardous substances or oil to navigable waters as soon as possible. The National Response Center (NRC) 24-hour number is 1-800-424-8802.
The Bowling Green Fire Department number is: 419-352-3106.
The Wood County LEPC number is: 419-354-9269.
The Ohio EPA release notification for 24-hour reporting of emergencies is:

In Ohio call: 1-800-282-9378
From out of state, or if the 800 number does not work, call: 614-224-0946
Be prepared to relay as much of the information listed below as is known or can be estimated at the time of reporting. Please remember this is an initial report and estimates can be corrected in your follow-up emergency notice report.

b. Name and phone number of the person to contact for further information;
c. Location and source(s) of the release or discharge;
d. Chemical name or identity of any substance(s) involved in the release or discharge;
e. Is the substance an extremely hazardous substance;
f. Estimate of the quantity (gallons or pounds) discharged into the environment;
g. Time and duration of the release or discharge;
h. The environmental medium or media into which the substance was released or discharged;
i. Potential health effects associated with the release or discharge of the substance; and

j. Report precautions taken, including evacuation, remediation, or other proposed response actions.

This information is required under ORC Section 3750.06(C) and Rule 3750-25-25(A)(1) of the Ohio Administrative Code (OAC). Written follow-up requirements are required within 30 days and are detailed in the Appendices referenced in Section 5, Emergency Response of this SPCC Plan.

The SPCC plan shall be amended within six months whenever there is a change in facility design, construction, operation, or maintenance that materially affects the facility's spill potential. An amendment required by the EPA or Ohio Environmental Protection Agency (OEPA) as a result of a reportable spill must be implemented within 30 days. The plan must be reviewed at least once every five years and amended to include more effective prevention and control technology, if such technology will significantly reduce the likelihood of a spill event and has been proven in the field. A registered professional engineer must certify all technical changes or amendments to the Plan.

Environmental Recycling is not required to submit a Facility Response Plan (FRP), the SPCC plan and has included a signed Certification of Substantial Harm Criteria form in Appendix 1, described in Appendix C to 40 CFR Part 112.

2.0 FACILITY INFORMATION:

Facility Name:	Environmental Recycling
Street Address:	527 East Woodland Circle Bowling Green, OH 43402
Mailing Address:	PO Box 167 527 East Woodland Circle Bowling Green, OH 43402 Telephone: 419/354-5110
Owner:	Pemm Group PO Box 167 527 East Woodland Circle Bowling Green, OH 43402 Telephone: 419/354-6110 Emergency: 800/284-9107
Contact Name:	Paul Cottrell, Chief Executive Officer, CEO 527 East Woodland Circle Bowling Green, OH 43402 Telephone: 419-354-6110
Other Personnel:	The facility employs approximately 15-20 people.
Location:	The facility is located in Wood County within the City of Bowling Green, Ohio, southeast of the intersection of Poe Road and Dunbridge Road in the Woodbridge Industrial Park. Storm water runoff is discharged through various catch basins, eventually flowing northward from Wodbridge Road to Poe Ditch. Sanitary flow is separated from storm water and treated at the Bowling Green POTW on Dunbridge Road. The facility location is also identified as Latitude; 41 degrees 22 minutes 48 seconds (N); Longitude 83 degrees 36 minutes 11 seconds (W). Site plan information is attached in Appendix 2.
Facility Description:	Environmental Recycling is a 24,000 square foot facility licensed through the Ohio EPA as a RCRA Part B Recycling Facility for fluorescent lamps, batteries, computers, electronic equipment, mercury devices and mercury collection and holds a PCB Commercial Storage Permit and a Hazardous Waste Haulers Permit. Environmental Recycling began operations at the present site in 1998. The facility North American Industrial Classification System (NAICS) code is: 562920 – Materials Recycling Facilities (1987 SIC Code 4953).
SPCC Plan Distribution and Maintenance: 40 CFR 112.3(e)	A copy of this SPCC plan is kept on site and accessible at all times. A copy is kept in the main office as well as with department managers. The General Manager has the Master Copy. Access shall be granted to this plan to the USEPA, the Ohio EPA or other local agency inspector for on-site review during normal working hours. The appropriate employees are advised of specific locations of the SPCC plan.

3.0 TANK INVENTORY AND MAPS 40 CFR 112.7(a):

The attached inventory (Tables 1and 2) and maps (Appendix 2) depict locations and types of materials that meet or exceed the requirements of: 40 CFR 112.7, General Requirements for Spill Prevention Control and Countermeasure Plans.

The SPCC Plan is a carefully thought out plan, prepared in accordance with good engineering practices, and which has the full approval of management at a level with authority to commit the necessary resources. If the plan calls for additional facilities or procedures, methods, or equipment not yet fully operational, these items are discussed in separate paragraphs and the details of installation and operational start-up will be explained separately. The complete SPCC Plan follows the sequence outlined in 40 CFR 112.7, and includes a discussion of the facility's conformance with the appropriate guidelines listed:

(a) A facility which has experienced one or more reportable spill events within twelve months prior to the effective date of this part must include a written description of each such spill, corrective action taken and plans for preventing recurrence.

(b) There is a reasonable potential for equipment failure (such as tank overflow, rupture, or leakage), and the plan includes a prediction of the direction, rate of flow, and total quantity of oil that could be discharged from the facility as a result of each major type of failure.

NOTE: Outside containment (if applicable) is designed to hold at least 110% of the volume of the largest container. Inside containment typically holds over 100% of the volume of the largest container.

Various additional materials are present throughout the facility in limited quantities containers smaller than 55-gallons. Material Safety Data Sheets (MSDS) for all facility materials can be obtained from the General Manager.

4.0 SPCC PLAN CERTIFICATION AND REVIEW - 40 CFR 112.3, 112.5 and 112.7:

4.1 Engineer Certification - 40 CFR 112.3(d) - A list of the SPCC emergency coordinators and the Professional Engineer certification of the SPCC Plan is found in Appendix 3.

4.2 Plan Amendments - 40 CFR 112.5 - The SPCC Plan is amended whenever there is a change in design, construction, operation or maintenance, which materially affects the facility's potential for an oil or hazardous material discharge into US navigable waters. In accordance with the EPA regulations, the SPCC Plan shall be reviewed and evaluated by Environmental Recycling once every five years. A signed, dated statement will be affixed to the SPCC Plan documenting the results of this evaluation. Environmental Recycling will have the Plan amended within six months of the review to include more effective prevention and control technology if:

a. Such technology will significantly reduce the likelihood of a spill event from the facility, and;
b. If such technology has been field proven at the time of the review.

A Professional Engineer will certify any such amendments. Any records of certified revisions are attached in Appendix 4.

Plan amendments – OAC Rule 3745-54-54 - The contingency plan shall be reviewed, and immediately amended, if necessary, whenever:

1. The facility's Ohio hazardous waste permit is revised
2. The contingency plan fails in an emergency
3. The facility changes – in its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or changes the response necessary in an emergency
4. The list of emergency coordinators changes
5. The list of emergency equipment changes
6. The director requests the review or amendment
7. A change in the list of facility emergency coordinators or equipment in the contingency plan constitutes a minor modification to the facility's Ohio hazardous waste permit to which the contingency plan is a condition.

4.3 Management Approval 40 CFR 112.7 - Per 40 CFR 112.7, this SPCC Plan is fully approved by the management of Environmental Recycling, Bowling Green, Ohio at a level with authority to commit the necessary resources to implement the plan. A signed management approval is located in Appendix 3.

5.0 EMERGENCY RESPONSE:

5.1 Environmental Emergency Contacts - The Environmental Emergency Coordinator contacts list is attached in Appendix 3. The spill control team consists of the General Manager and his designated alternates, security and the designated environmental contractors. Lists of Environmental Emergency Response incident contacts and response agencies and agreements for the Environmental Recycling facility are also provided in Appendices 5 and 6.

5.2 Management Level Regulatory Reporting - The Environmental Recycling reporting format for regulatory reporting is attached in Appendix 7, along with the Ohio spill reporting requirements.

5.3 Emergency Notification Procedure - The procedures to be followed upon fire, explosion, or discovery of a release are described in Appendix 8 and Section 7.0.

6.0 SPILL PREVENTION CONTROL AND COUNTERMEASURE - 40 CFR 112.7 AND 112.8:

6.1 Past Spill Experience - 40 CFR 112.7(a) - A description of all (any) past reportable spills at this site is attached in Appendix 9. Any corrective actions taken as a result of a spill and any plans for preventing a recurrence are also listed.

6.2 Potential Equipment Failures - 40 CFR 112.7(b) - The attached Tables 1 and 2 list potential equipment failures and prediction of flow direction should a release occur.

6.3 Containment And Diversionary Structures - 40 CFR 112.7(c)(1) Onshore Facilities - Appropriate Containment and Diversionary Structures for this facility are:

(c)(1)(i): Dikes, berms or retaining walls sufficiently impervious to contain spilled oil: Dikes and berms are provided around various bulk containers and drums throughout the facility, including locations as shown in the table of active tank listings. The entire Building #2 is contained by a sunken, minimum six inch dike.

(c)(1)(ii): Curbing: Curbing is used for containment in the Building #1 PCB Storage area, and the mercury and glycol storage areas in Building #2.

(c)(1)(iii): Culverting, gutters or other drainage systems: Interior drains are connected to the sanitary sewer. Sanitary effluent is discharged into the Bowling Green sanitary sewer system for additional treatment.

(c)(1)(iv): Weirs, booms or other barriers: Sorbent materials and drain cover spill mats are available onsite (see Appendix 10) and from contracted environmental firms. Spill control or clean up materials are available throughout the facility. All SPCC trained facility employees have access to these materials. Other barriers in the form of drum secondary containment are supplied and used in areas where there is the potential for a drum to fail and discharge oil into the facility. Other barriers in the form of impervious floors and walls are used to contain spills throughout the facility. The adjustable ramps at the truck docks have sufficient containment capacity for at least one 55 gallon drum.

(c)(1)(v): Spill diversion ponds: These are not utilized at this facility.

(c)(1)(vi): Retention ponds: These are not used at this facility

(c)(1)(vii): Sorbent materials: These are provided throughout the facility and during all bulk liquid transfers and are replenished by facility personnel. These materials would be used generally to contain smaller spills both interior and exterior to the facility buildings. A listing of spill kit locations and available emergency equipment is attached in Appendix 10.

6.4 Demonstration Of Practicability - 40 CFR 112.7(d) - Facility management has determined that use of the containment diversionary structures or readily available equipment to prevent discharged oil from reaching navigable waters is practical and effective at this facility. Records of periodic integrity and leak testing of bulk storage containers and valves and piping, as applicable, are kept by the PCB Manager (daily) and the appropriate area Shop Supervisors (weekly). Examples of inspection forms are included in Appendix 11.

6.5 Inspections And Records - 40 CFR 112.7(e)

6.5.1 Spill Prevention Inspections - Inspection of certain items is required to determine the ability of equipment and structures to prevent failure and accidental discharges of oil. Spill Prevention Inspections are carried out by individuals designated by the General Manager.

Inspections, as required by the SPCC Rules will be performed at the appropriate time as determined by the General Manager, who will also maintain a report.

In accordance with SPCC Regulations, a copy of the inspection form required by 40 CFR 112 Appendix F, is attached in Appendix 11. A record of the inspections and any maintenance work performed is placed in the Environmental Health and Safety office and maintained therein for a period of at least three years. All records of a spill or release will be maintained indefinitely.

6.5.2 Inspection Procedures and Records - To ensure compliance with Ohio State and Federal Laws, the following procedures are followed by the General Manager.

- The intent of the program is to provide daily and monthly (General Manager) inspections of all equipment, structures, and foundations at all chemical and oil storage sites. Daily inspections include all oil tanks and piping, the unloading areas, tank storage areas, and pipes and piping and stormwater structures. Daily visual inspections consist of a complete walk through of the facility property to check for tank damage or leakage, stained or discolored soils and accumulation of liquids in diked areas. Any liquids accumulating in diked areas must be pumped out by manually setting up a pumping system, following a determination of the contents. In order to avoid unnecessary duplication, a separate specific daily inspection report is not required provided records of any leakage or visual anomalies are noted in the form of an incident report filled out and turned in to the President. The General Manager will be responsible to sign a Monthly Inspection Report. The inspection is combined with the drum inspection program and any visually observable deficiencies are noted on the form. An example copy of this form is located in Appendix 11. The General Manager inspection reports are maintained and available for inspection for 3 years.
- Monthly SPCC inspections procedure:
  1. Clean containment areas of debris/material.
  2. Inspect containment areas for cracks or imperfections. Special attention shall be given to wall/floor joints, expansion joints, etc.
  3. Inspect all metal structures for corrosion/oxidation.
  4. Inspect all fluid handling equipment (tanks, piping, fittings, etc.) for possible leaks.

6.5.3 Record of Dike Drainage - This record is completed when rainwater from diked areas is drained into a storm drain or into an open watercourse, lake, or pond, and bypasses any in-plant treatment. There are no exterior dikes that would require

drainage at this facility, however, a copy of the log required by 40 CFR 112, is attached for reference as Appendix 12.

6.6 Personnel, Training, And Discharge Prevention Procedures - 40 CFR 112.7(f) - During the orientation of each new employee that may require SPCC training , instruction is given verbally in the proper operation and maintenance of equipment necessary for his or her job function. At this time, the employee is instructed in the general importance of preventing, controlling, containing, and cleaning up discharges of oil, chemicals or hazardous substances.

(f)(1): Facility personnel have been instructed by management in the operation and maintenance of oil pollution prevention equipment and pollution control laws and regulations. A training program has been established to familiarize the appropriate personnel with emergency procedures. Employees are instructed in the use of procedures, which must be followed in the event of an emergency and are made aware of applicable pollution control laws and regulations. All employees working in the facility attend an annual in service training program regarding the SPCC plan. Topics to be included are (but not limited to):

1. Leak detection monitoring activities
2. Operation and maintenance of equipment to prevent discharges
3. Spill prevention and inspection procedures
4. Discharge procedure protocols
5. Regulations concerning spill response
6. Other applicable regulations (eg. Hazardous Waste)
7. Contents of the facility SPCC Plan
8. Record keeping

Any Contractor, subcontractor or temporary personnel whose work could cause a spill are informed of facility operating features and spill prevention features that they should know in order to prevent, control, contain, and clean up a spill. Managers, supervisors, or others must report all spills to the General Manager.

(f)(2): The General Manager is assigned by the President and is accountable for oil spill prevention at Environmental Recycling, Bowling Green, Ohio.

(f)(3): Management will present spill prevention briefings at least yearly for operating personnel to ensure adequate understanding of the SPCC plan. Briefings will be scheduled and conducted by the owner or operators for operating personnel at intervals frequent enough to assure adequate understanding of the SPCC plan for this facility. These briefings also highlight and describe known spill events or failures, malfunctioning components, and recently developed precautionary measures. Personnel will also be instructed in operation and maintenance of equipment to prevent the discharges of oil and applicable pollution control laws, rules, and regulations. During these briefings there is an opportunity for facility operators and other personnel to share recommendations concerning health, safety, and environmental issues encountered during operation of the facility. An example meeting attendance record, required by 40 CFR 112, is attached in Appendix 13. The General Managers' department will maintain these records with the agenda for each meeting for three years.

6.7 Security - 40 CFR 112.7(9) -

(9)(1): Access to the site is controlled at all entrances and exits by Environmental Recycling personnel during working hours. A security system (Habitec) is enabled to monitor the site during off hours. In addition, facility managers perform multiple facility tours throughout each day. Any signs of releases or tampering will be reported to the emergency coordinators who will visually inspect

the site and determine the need for testing and notification of regulatory officials. All tanks or containers containing oil are located within the facility in secured areas.

(9)(2): There are no containment drain valves used at this facility. All diked or curbed areas must be inspected prior to manual pump setup and drainage. The Shop Supervisors must authorize all dike drainage transfers.

(9)(3): There are no electrical starter controls for the transfer pumps. Pumps used at ER are either air driven diaphragm pumps that must be manually set up and operated or gasoline operated trash pumps. The entire facility is a restricted area and only authorized employees operate transfer pumps under the direction of the Shop Supervisor.

(9)(4): The loading and unloading connections of oil or materials transfer pipelines are capped when not in service or when in standby service for an extended time.

(9)(5): Lighting located around the facility affords adequate illumination for inspection and safe plant operation, as well as for spill surveillance and the deterrence of vandalism. Portable lighting equipment is also available through an approved environmental contractor if necessary.

6.8 Facility Tank Car And Tank Truck Loading/Unloading Rack - 40 CFR 112.7(h) -

(h)(1): Any loading/unloading facilities at the site where drainage does not flow into a catchment basin or treatment facility designed to handle discharges are noted in Tables I and 2. All containment systems are designed to hold the maximum capacity of any single compartment of a vehicle loaded or unloaded at the facility unless detailed below.

Bulk unloading at this facility is accomplished by driving the transport vehicle inside of the building prior to conducting a transfer. Transfer areas at this facility do not have quick drainage systems to contain a spill from a tank truck, however, a spill in these areas would be contained in paved areas that are capable of holding the single largest compartment of any truck used at the facility. The spill would be promptly contained and cleaned up by facility personnel or one of the contracted 24 hour environmental services companies.

(h)(2): Loading/unloading vehicles are prevented from departing before complete disconnection of flexible or fixed oil transfer lines by the following methods: Chock blocks are required during the loading/unloading operations to prevent premature vehicular departure. During unloading, the tank truck driver and an Environmental Recycling representative are both required to supervise and monitor unloading and remain in the area until transfer is complete with no signs of leakage. Warning signs are provided to prevent departure before complete disconnection.

(h)(3): The lower most drain and all outlets on tank trucks are inspected by the driver prior to filling and departure in order to prevent any discharge during transit.

6.9 Field Constructed Aboveground Container - 40 CFR 112.7(i) - If a field-constructed aboveground container undergoes a repair, alteration, reconstruction, or a change in service that might affect the risk of a discharge or failure due to brittle fracture or other catastrophe, or has discharged oil or failed due to brittle fracture or other catastrophe, evaluate the container for risk of a discharge or failure due to brittle fracture or other catastrophe and as necessary, take appropriate action. This section does not apply to this facility at this time.

6.10 Conformance with Applicable State Rules, Regulations and Guidelines - 40 CFR 112.7(j) - This SPCC Plan conforms to all applicable sections of 40 CFR 112 and current Ohio rules, regulations and guidelines.

6.11 General Requirements - 40 CFR 112.8(a) - This SPCC Plan meets the applicable requirements of 40 CFR 112.7 and the specific discharge prevention and containment procedures listed in 40 CFR 112.8.

6.12 Facility Drainage - 40 CFR 112.8(b) - All drainage systems within the facility building convey water directly to the sanitary sewer which flows to the City of Bowling Green Publicly Owned Treatment Works (POTW). Any oil leaks or tank overflows will drain into contained areas and be recovered. Accidental spillage outside the facility in the yard or parking area, if unchecked, could enter the storm sewer via two parking lot catch basin locations or the loading dock drain. Additionally, runoff from some road and parking surfaces is conveyed to the City of Bowling Green Sanitary/Storm water System. Removal of an oil spill that enters the storm sewer will be accomplished by oil skimming and pumping in the sewer and plugging the sewer at the nearest down gradient catch basin with sorbent materials and booms readily available onsite. The drainage system is equipped with a gate valve designed prevent flow to the municipal POTW when activated.

(b)(1): Valves or manually activated pumps or ejectors are used to drain liquids from containment areas following inspection to assure no discharge of oil. Drainage from the interior diked or curbed areas is retained to prevent a spill or other excessive leakage of oil into the drainage system. The diked areas would retain any spillage until such time as it could be removed using a portable pump or wet vac.

(b)(2): Manual drain valves are not used to drain accumulated storm water in diked areas. Diked or bermed areas at this facility are not equipped with drain valves and must be pumped out following appropriate inspection and authorization. Flapper drain valves are not used to drain diked areas.

(b)(3): Exterior storm water flows toward onsite catch basins, however, the Environmental Recycling bulk transfer procedures require the catch basins and drains to be covered with magnetic or flexible drain covers during any outdoor transfers, effectively creating a full containment within asphalt or concrete paved areas. Environmental Recycling policy requires that all bulk transfers are conducted inside of the facility.

(b)(4): Facility drainage is designed to retain, within practical limits, an oil spill within the facility.

((b)(5): A lift pump is not used at this facility as part of a spill control system. Bulk transfer pumps are available onsite to pump liquids from the catch basins in the event of a release.

6.13 Bulk Storage Containers - 40 CFR 112.8(c) - As an integral part of this plan, the General Manager conducts annual visual inspections of all tanks and lines. This inspection includes an examination of such items as seams, rivets, nozzle connections, valves and all pipelines directly connected to the tanks. In addition, the inspection includes the foundation and support structures for all above ground installations. Any defects noted during this inspection or due to any mechanical failure are reported immediately to the President so that corrective repairs can be made. Any bulk storage area with a surrounding dike will be manually cleared of accumulated liquids and the events will be recorded on the form shown in Appendix 12. These records as well as records of the inspections are kept by the General Manager for a minimum period of three years.

(c)(1): All tanks, portable tanks and containers are built of material compatible with oil or other materials stored within the container. There are several aboveground tanks at this facility. The drums onsite are constructed of plastic or metal, which is compatible with the material stored and conditions of storage. The smaller containers are constructed of plastic or metal per manufacturer's specifications.

(c)(2): The bulk above ground oil containing equipment in the facility includes a diked PCB drum storage and staging area and one 1,200 gallon portable mineral oil tank in Building #1. This tank is double walled and used for storage of on-spec used oil for burning. The heater is equipped with a sensor designed to shut down the pump when not in use to prevent the possibility of spillage or release. Four, 2,500 gallon poly tanks, four 5,000 gallon steel tanks and various quantities of oil containing drums and bulk equipment are located in building #2. In building #2 all of these areas are enclosed in a dike or curb capable of containing the entire capacity of the largest single container as part of the construction. In addition, some containers are stored on spill containment pallets capable of retaining at least the volume of the largest single container. The 1,200 gallon tank in building #1 is doubled walled. A detailed listing of bulk storage locations at this facility is located in Tables 1 and 2.

(c)(3): Drainage of uncontaminated rainwater from diked areas, if applicable, is only permitted if the procedures and records listed in Appendix 12 are maintained. There are currently no outdoor diked areas located at this facility.

(c)(4): Corrosion protection, buried metallic tanks: There are two underground tanks that are used for motor fuel storage. There are no buried tanks at the facility.

(c)(5): Corrosion protection, partially buried metallic tanks: There are no partially buried tanks at the facility.

(c)(6): Integrity testing and visual inspections: The aboveground tanks and other oil containers at the facility are visually inspected at least daily by facility operating personnel, however there is no scheduled periodic testing using a system of non-destructive shell thickness testing. Daily visual inspections are recorded only when a deficiency is noted. Hydrostatic testing is ongoing, since the aboveground tanks are only used periodically and any leaks would be discovered during the visual inspections. In addition, these inspections are documented every month.

(c)(7): Heating coil leakage: Oil/water heating coils or exchangers are not used at this facility.

(c)(8): Provide alarm or leak detection devices in accordance with good engineering practices to avoid discharges and periodically verify the proper operation of the devices: The bulk mineral oil tanks are see through poly construction, therefore they are not equipped with overfill alarms. All transfers to and from these tanks are performed manually and continuously attended by Environmental Recycling personnel. Venting capacity is suitable for the fill and withdrawal rates.

(c)(9): Observation of effluent discharges: The facility storm sewer outlets are observed periodically or if a release is suspected, depending upon the facility's operations.

(c)(10): Visible discharges: Oil leaks that result in a loss of oil from tank seams, gaskets, piping, pumps, valves, rivets, and bolts are promptly corrected. Any visible discharges found in containment areas are promptly removed.

(c)(11): Portable and mobile containers: The portable or mobile oil storage, such as 55-gallon drums and the 1,200 gallon transfer cart, are located to prevent spilled oil from reaching navigable water, provided with secondary containment as needed, and are located where they will not be subject to periodic flooding.

6.14 Facility Transfer Operations, Pumping, And Facility Process - 40 CFR 112.8(d)

(d)(1): Buried piping corrosion protection: There is currently no buried petroleum piping at this facility.

(d)(2): Pipelines not in service or on standby for an extended period are capped or blank flanged and marked as to their origin.

(d)(3): All pipe supports are properly designed to minimize abrasion and corrosion and to allow for expansion and contraction.

(d)(4): All above ground pipelines and valves and surfaces are examined periodically by facility personnel to assess their condition. Pressure testing for piping is conducted as warranted. Visual inspections are conducted and documented monthly. Integrity and leak testing of buried piping is required at installation, modification, construction, relocation or replacement.

(d)(5): Vehicle warnings: All vehicles which enter an area with above ground piping are warned of the existence of the piping.

Note: A standard operating procedure for bulk unloading is attached as Appendix 14.

6.15 Sample Dike Height Calculation - Dike containment calculations required by 40 CFR112 Appendix D are conducted as shown in the following example:

a) minimum containment volume (mcv) = to capacity of largest tank in a tank installation, in this example 2,500 gallons. Mcv = 2,500 x 0.1337 cu. Ft/gal. = 334.25 cu. ft.
   * factor in freeboard per local requirements.

b) dike area (proposed) Length x Width

c) dike height (proposed)

d) dike volume (dike area x dike height)

e) displacement volume (tank area x tank height of dike wall)
   * Volume of tank (cylinder) = $\pi r^2 h$

f) effective secondary containment
   dike volume - displacement volume = x
   1) if x is greater than the mcv then the secondary containment may be adequate, if sufficient freeboard for precipitation is factored in
   2) if x is less than mcv, adjust the dike area n dike height accordingly, then recalculate.

6.16 Implementation Schedule Of Items To Be Installed As Part Of The SPCC Plan - A form detailing items to be installed, as required by 40 CFR 112, is attached as Appendix 15.

7.0 SPILL PROCEDURES

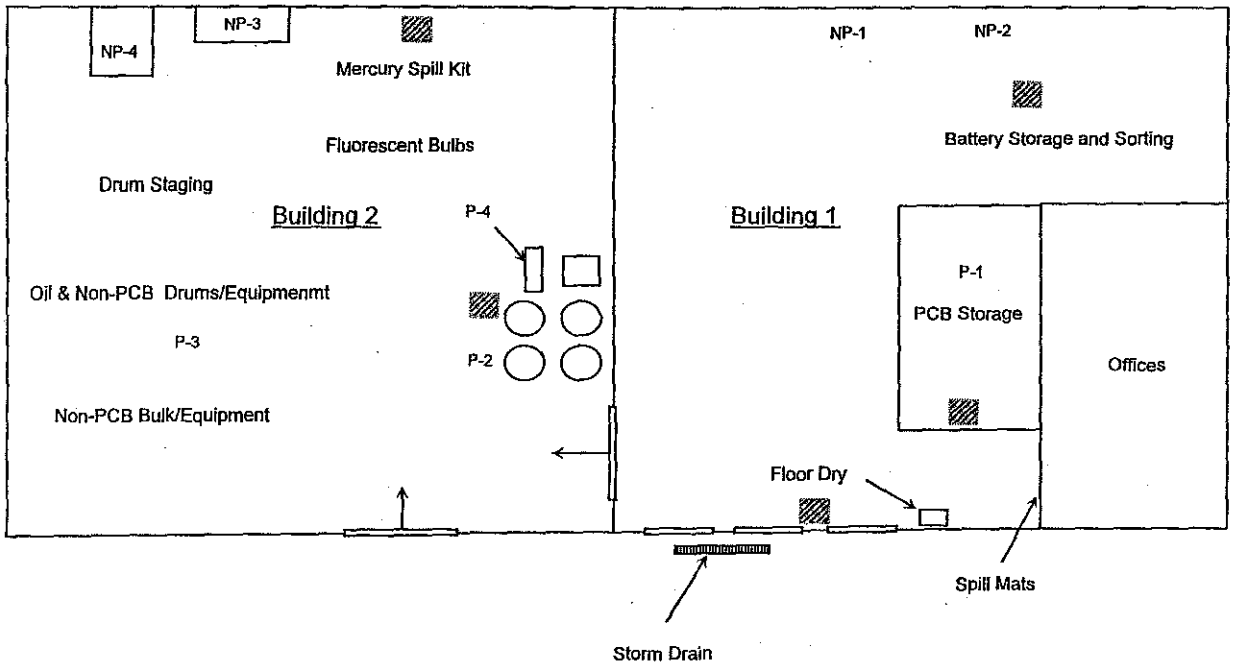
Actions to control, contain, remove, and clean up emergency situations are to begin immediately when an emergency situation is observed. Different courses of action are required depending on the locations and type of emergency. The general actions to be taken in the event of a fire, explosion, spill of petroleum products, or unplanned release involving hazardous substances, are detailed in Appendix 8. Waste resulting from an emergency situation, such as a fire, explosion or spill residues, may be hazardous wastes. Disposal and handling should be in accordance with Ohio EPA regulations. Federal Regulations may also govern identification and Disposal of hazardous materials. The General Manager shall make the appropriate determination. In general, for very small spills Environmental Recycling personnel will utilize the available cleanup materials to contain and clean up the release. If a spill or release were to enter into any one of the three storm drains located in the parking lot an ER employee would immediately activate the gate valve located at the entrance to the facility. This gate valve restricts flow access of the storm drain and contains the internal contents to the ER property.

The facility also has a list of contractors available on call 24-hours per day that is capable of responding to various types of emergencies. This contractor would respond to all but the most minor releases and reports to the General Manager. The General Manager and Alternate Emergency Coordinators have knowledge of spill control, reporting procedures, critical contacts, and where the spill equipment is located. Policies and procedures are written and available in hard copies and/or in computers located at the facility. Twenty-four hour contact numbers are provided for guidance and consultation. Instructions, emergency response contractors and phone numbers regarding the reporting of a spill to the National Response Center, the State of Ohio and other agencies are listed in Appendices 5 and 6 and have been publicized and posted in the appropriate facility offices. A map locating evacuation routes as well as fire extinguisher location is located in appendix 16. The local hospital has been notified of the hazards on site. (See appendix 17)

The Emergency coordinator will notify State and Local authorities before operations are resumed in the affected area(s) of the facility.

FIGURE 1
SITE PLAN
ENVIRONMENTAL RECYCLING
BOWLING GREEN, OHIO

N



Spill Kit Location
P-1 Petroleum Oil Storage Location
NP-1 Non-Petroleum Oil Storage Location

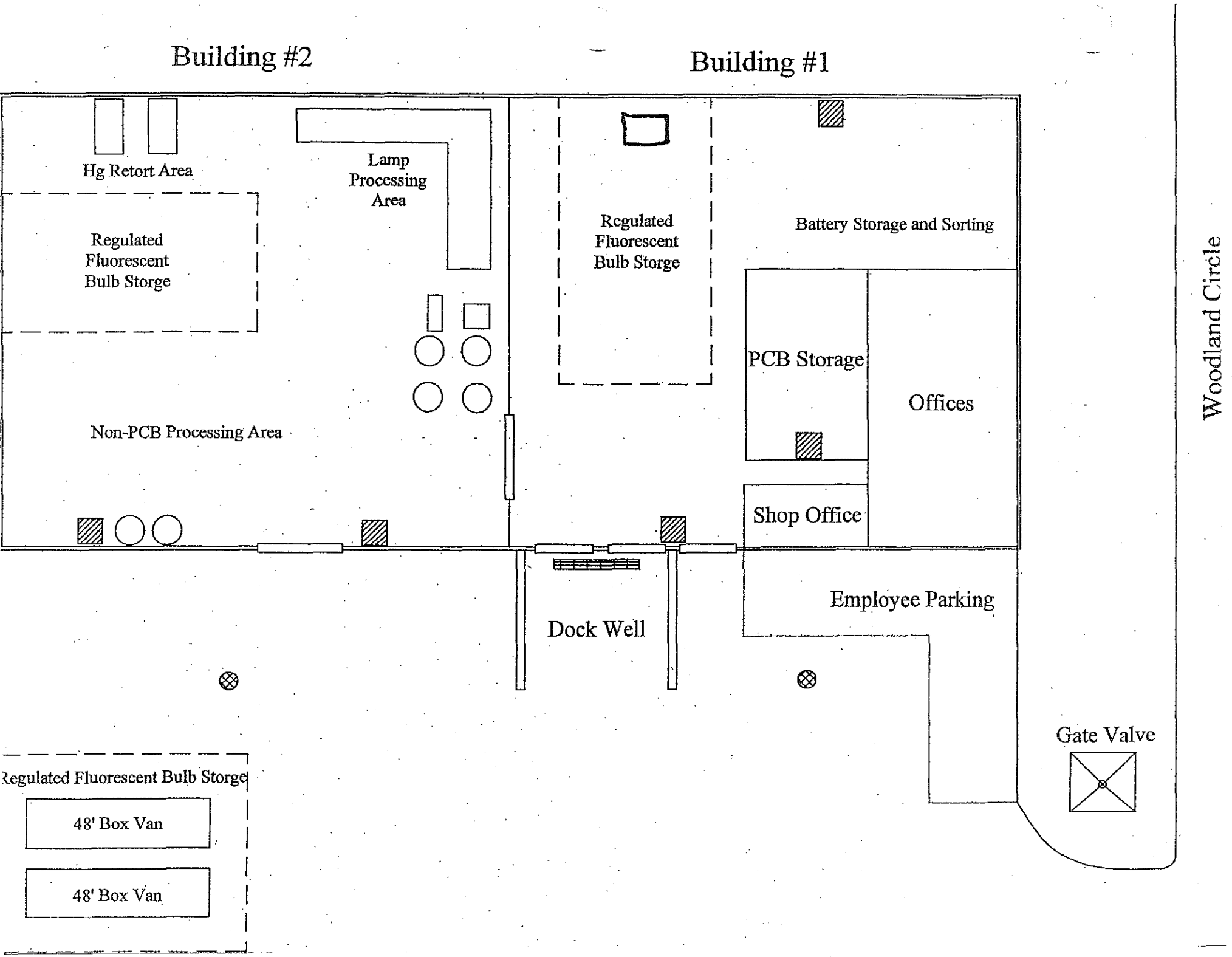

Building #2
Building #1
Hg Retort Area
Lamp Processing Area
Regulated Fluorescent Bulb Storge
Regulated Fluorescent Bulb Storge
Battery Storage and Sorting
PCB Storage
Offices
Non-PCB Processing Area
Shop Office
Employee Parking
Dock Well
Woodland Circle
Gate Valve
Regulated Fluorescent Bulb Storge
48' Box Van
48' Box Van

TABLE 1 – PETROLEUM STORAGE

Name	Functional Area	Contents	No. Tanks	Capacity (gals)	Type of tank	Inside Plant?	Spill Direction	Spill Rate GPM	Containment Type / Volume
P-1	PCB Storing & Staging	PCB Oils	80	4,400 (80 @ 55 gal.)	Steel Drum	Y	Dike >5,000 gal.	0-5	Dike >5,000 gal.
P-2	Non-PCB Oil Storage	Mineral Oil	8	4 @ 2500 4 @ 5000	Poly Steel	Y	Building 2 Containment	0-50	Building 2 Containment >40,000 gal.
P-3	Drums & Equipment	Mineral Oil, Non-Haz. Liquids, Mop Waters	Varies	Varies	Varies	Y	Building 2 Containment	0-50	Building 2 Containment >40,000 gal.
P-4	Portable Oil Transfer Tank	Mineral Oil	1	1,200	Steel	Y	Double wall Containment	0-10	Double Wall Containment

Note: Prediction of spill direction if secondary containment is breached. Spills inside buildings would be contained inside unless other potential is noted.

TABLE 2 – NON-PETROLEUM STORAGE

Name	Functional Area	Contents	No. Containers	Capacity (gal.)	Type of Containers	Located inside?	Spill Direction	Spill Rate GPM	Containment Type / Volume
NP-1	Battery Sorting & Storage	Potassium Hydroxide	1	55	Steel Drum	Y	Spill Pallet	0-5	Spill Pallet >110%
NP-2	Battery Sorting & Storage	Sulfuric Acid	1	55	Steel Drum	Y	Spill Pallet	0-5	Spill Pallet >110%
NP-3	Mercury Processing	Mercury	1	15	Steel	Y	Within Dike	0 - 15	6" dike >110%
NP-4	Mercury Processing	Glycol (used)	1	55	Steel Drum	Y	Within Dike	0 - 15	6" pan >110%

Note: Prediction of spill direction if secondary containment is breached. Spills inside buildings would be contained inside unless other potential is noted.

APPENDIX 1

Certification Of Substantial Harm Determination Form

Facility Name: **Environmental Recycling**
Facility Address: **PO Box 167, 527 East Woodland Circle**
Bowling Green, Ohio 43402

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

YES _____ NO X

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground storage tank area?

YES _____ NO X

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula[1]) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E to this part, section 10, for availability) and the applicable Areas Contingency Plan.

YES _____ NO X

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula[1]) such that a discharge from the facility would shut down a public drinking water intake[2]

YES _____ NO X

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

YES _____ NO X

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature	General Manager, Senior Chemist
	Title
Erik Thayer	12/29/07
Name (Type or Print)	Date

[1] If a comparable formula is used documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

[2] For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2 (c).

APPENDIX 1

Certification Of Substantial Harm Determination Form

Facility Name: Environmental Recycling
Facility Address: PO Box 167, 527 East Woodland Circle
Bowling Green, Ohio 43402

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

   YES _____ NO X

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground storage tank area?

   YES _____ NO X

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula[1]) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E to this part, section 10, for availability) and the applicable Areas Contingency Plan.

   YES _____ NO X

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula[1]) such that a discharge from the facility would shut down a public drinking water intake[2]

   YES _____ NO X

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

   YES _____ NO X

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature	President Title	OHIO EPA RECEIVED
Paul Cottrell Name (Type or Print)	12/2/05 Date	MAY 27 2008

[1] If a comparable formula is used documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

[2] For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2

APPENDIX 2

SITE PLAN LOCATIONS AND INFORMATION

Drawings included:

- Site Plan with storage locations and sewers
- USGS topographical map section.

APPENDIX 3

PLAN APPROVALS

Management commitment of resources

I, Paul Cottrell, attest that I am aware of the elements of this written plan and fully approve of the included procedures. I hereby commit whatever resources are necessary for its implementation. I hereby authorize the implementation of this SPCC plan as described herein and I appoint the individuals identified in this Plan to act as the Emergency Response Coordinator and Alternate Emergency Response Coordinators for Environmental Recycling. These persons are accountable and otherwise responsible for the implementation of the oil pollution prevention procedures included in this Plan.

Paul Cottrell
President

DESIGNATED EMERGENCY COORDINATOR

I, Paul Cottrell, designated as the Emergency Response Coordinator, will execute the spill prevention procedures herein. I have designated the persons identified below by signature as Alternate Emergency Response Coordinators to also be accountable for the implementation of the spill control and response procedures. We understand, however, that as Environmental Recycling Emergency Response Coordinators, we are solely responsible for carrying out these procedures.

Paul Cottrell, President, Engineer, Owner
161 Reflection Court
Petersburg, MI 49270
Phone: (419) 409-0413
Office: (419) 354-6110

1st Alternate:

Matt Zachary, Facility Manager
12926 Huffman Rd.
Bowling Green, OH 43402
Phone: (419) 409-1004
Office: (419) 354-6110

2nd Alternate:

Erik Thayer, Chemist, Owner
7687 Windsor Ln
Lambertville, MI 48144
Phone: (419) 409-0415
Office: (419) 354-6110

APPENDIX 3

SPCC EMERGENCY COORDINATOR PERSONNEL

Primary contact:
Paul Cottrell, Owner, President, directs day to day operations, scheduling, accounting and project departments. He has a BS degree in Civil Engineering and serves as the primary ERC. He has completed the OSHA 40-hour Hazardous Waste Operations training and is knowledgeable and experienced with environmental regulations.

Secondary contact:
Matt Zachary, Facility Manager. He has a degree in Environmental Policy and Analysis from Bowling Green State University and has been with Environmental Recycling for 3 years. Matt has over 2 years experience in hazardous material spill clean up operations form previous employment. Matt has participated in numerous training courses with regards to EPA, RCRA, TSCA, and OSHA regulations. He is currently responsible for Facility Management including the PCB commercial storage area at Environmental Recycling.

Alternate contact:
Erik Thayer, Owner, Chief Operations Officer, Senior Chemist. He is a degreed chemist. He began with Lamps Inc., parent company of Environmental Recycling since its inception in 1995. He has had training in spill control, hazardous materials, HAZWOPER and other regulatory disciplines.

In the event of an emergency Mr. Cottrell will be contacted first. Mr. Cottrell will contact Mr. Zachary to initiate the emergency response procedures and proceed to the facility as needed.

APPENDIX 3

PLAN APPROVALS

Management commitment of resources

I, Mike Dolkowski, attest that I am aware of the elements of this written plan and fully approve of the included procedures. I hereby commit whatever resources are necessary for its implementation. I hereby authorize the implementation of this SPCC plan as described herein and I appoint the individuals identified in this Plan to act as the Emergency Response Coordinator and Alternate Emergency Response Coordinators for Environmental Recycling. These persons are accountable and otherwise responsible for the implementation of the oil pollution prevention procedures included in this Plan.

Mike Dolkowski
President

DESIGNATED EMERGENCY COORDINATOR

I, Erik Thayer, designated as the Emergency Response Coordinator, will execute the spill prevention procedures herein. I have designated the persons identified below by signature as Alternate Emergency Response Coordinators to also be accountable for the implementation of the spill control and response procedures. We understand, however, that as Environmental Recycling Emergency Response Coordinators, we are solely responsible for carrying out these procedures.

Erik Thayer
General Manager, Senior Chemist
Work phone: (419) 354-6110
Cell phone: (419) 409-0415

Alternates:

Mike Dolkowski
President
Work Phone (419) 354-6110
Cell phone: (419) 409-0417

Paul Cottrell
Vice President
Work phone: (419) 354-6110
Cell phone: (419) 409-0413

December 2003

APPENDIX 3

SPCC EMERGENCY COORDINATOR PERSONNEL

Erik Thayer, General Manager, Senior Chemist, is to serve as the primary emergency response coordinator (ERC). He is a degreed chemist. He began with Lamps Inc., parent company of Environmental Recycling since its inception in 1995. He has had training in spill control, hazardous materials, hazwoper and other regulatory disciplines.

Mike Dolkowski, President, is responsible for the overall administration of the SPCC program. He is to serve as the first alternate ERC in the absence of the onsite primary ERC. Mr. Dolkowski has a masters degree in engineering and more than 20 years experience in the chemical safety/environmental field. He has had training in health and safety regulations, issues, policies, and has completed the OSHA 40-hour Hazardous Waste Operations training.

Paul Cottrell, Vice President, directs day to day transportation operations, scheduling, accounting and project departments. He has a BS degree in Civil Engineering and serves as a backup ERC. He has completed the OSHA 40-hour Hazardous Waste Operations training and is knowledgeable and experienced with environmental regulations.

December 2003

Professional Engineer's (PE) Certification:

I, Robert S. DiNardo, hereby certify that I have examined the facility for which this plan has been prepared and, being familiar with the provisions of 40 CFR Part112, attest that this SPCC Plan has been prepared in accordance with 40 CFR 112.7 and with good engineering practice.

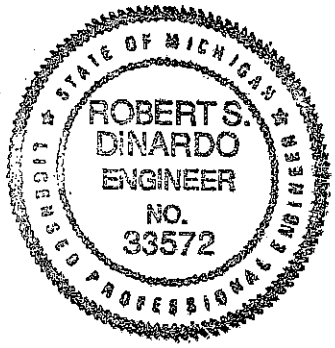
Name of Registered Professional Engineer: Robert S. DiNardo, PE, CIH, CHMM

Signature of Registered Professional Engineer: _____

12/29/03
Date

Registration Number: 33572

State of Registration: Michigan



APPENDIX 4

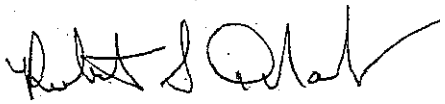
PLAN AMMENDMENTS AND REVISIONS

Signature	Is an amendment necessary per 40 CFR 112.5(b) and OAC 3745-54-54?	Date Completed - Deadline for Next Review
Robert S. DiNardo, PE 12.11.08	The SPCC Plan has been revised to incorporate the July 17, 2002 changes set forth in 40 CFR 112 and applicable changes in petroleum materials storage and containment.	12/11/08 – 12/11/13
(Print Name)		
(Print Name)		

List of revision dates	Reason for Revision	Reviewer
12/29/03	July 2002 SPCC rule changes	Robert S. DiNardo, PE
11/2/05	Update Emergency contacts	Todd Hendrick
11/2/05	Update Emergency response contractors	Todd Hendrick
11/2/05	Update site plan	Todd Hendrick
7/23/06	Update Appendix 8	Todd Hendrick
3/13/07	Appendix 16 and 17 added	Todd Hendrick
5/25/07	Updated Emergency contacts	Todd Hendrick
9/13/07	Updated Emergency response contractors	Todd Hendrick
12/11/08	Professional Engineer re-approval	Robert S. DiNardo, PE

APPENDIX 4

PLAN AMMENDMENTS AND REVISIONS

Signature	Is an amendment necessary per 40C FR 112.5(b) ?	Date Completed - Deadline for Next Review
	The SPCC Plan has been revised to incorporate the July 17, 2002 changes set forth in 40 CFR 112 and applicable changes in petroleum materials storage and containment.	12/29/03 – 12/29/08

Robert S. DiNardo, PE

(Print Name)

(Print Name)

List of revision dates	Reason for Revision	Reviewer
12/29/03	July 2002 SPCC rule changes	Robert S. DiNardo, PE

APPENDIX 5

EMERGENCY TELEPHONE NUMBERS

NOTIFICATIONS: In the event of a spill of a large amount of chemicals, fuel oil or diesel oil, or a potential leak of the underground storage tanks, notify the following, giving details as requested from the incident report form in Appendix 7:

1. Ohio EPA - emergency response hotline		1-800-282-9378
2. Bowling Green Fire Division		419-352-3106
3. Local Emergency Planning Committee		419-354-9269
	(24 Hour)	419-354-9001

OPTIONAL AND/OR CONDITIONAL NOTIFICATIONS

4. City of Bowling Green Wastewater Treatment Plant		419-354-6274
5. City of Bowling Green Offices		419-352-2571
6. U.S. EPA National Response Center		1-800-424-8802 1-800-426-2675
7. U.S. EPA (Region V)		1-312-886-6236
8. Wood County Health Department		419-352-8402
9. U.S. Coast Guard		1-419-259-6372
	(24 hour)	1-419-259-6448
10. Ohio State Fire Marshall Office Bureau of Underground Storage Tanks (underground storage tank release only)		1-614-864-5510
11. Ohio Division of Wildlife		1-419-424-5000

Emergency Coordinators

Title	Name	Location	Phone
Emergency Coordinator	Paul Cottrell	Front office	419-409-0413
1st Alternate Emergency Coordinator	Matt Zachary	Front office	419-409-1004
2nd Alternate Emergency Coordinator	Erik Thayer	Front Office	419-409-0415

Emergency Response Contractor (ERS of Ohio) (419) 354-0515

APPENDIX 6

EMERGENCY RESPONSE CONTRACTORS

1. SQS Environmental Inc.
   7522Baron Drive
   Canton, MI 48187
   (734) 459-3800

2. Cousins Environmental Services
   1701 Matzinger Road
   Toledo, OH 43608
   (419) 726-1500

3. ERS of Ohio
   519 Ordway Avenue
   Bowling Green, Ohio 43402
   (419) 354-0515

Appendix 7
MANAGEMENT LEVEL REGULATORY REPORTING FORMAT

This Section is a reporting reference for Management responsible and authorized to report spills.

1) FIRST call the Ohio Spill Hotline. **(800) 282-9378 or (614) 224-0946**

- Tell them:

1. Name and phone number of the person to contact for further information;
2. Location and source(s) of the release or discharge;
3. Chemical name or identity of any substance(s) involved in the release or discharge;
4. Is the substance an extremely hazardous substance;
5. Estimate of the quantity (gallons or pounds) discharged into the environment;
6. Time and duration of the release or discharge;
7. The environmental medium or media into which the substance was released or discharged;
8. Potential health effects associated with the release or discharge of the substance; and
9. Report precautions taken, including evacuation, remediation, or other proposed response actions.

This information is required under ORC Section 3750.06(C) and Rule 3750-25-25(A)(1) of the Ohio Administrative Code (OAC). Written follow-up requirements are required within 30 days and are detailed below.

- ANY spill that has occurred into the storm sewer or potential water supply or air should be reported by legal statute to the Ohio EPA. This only pertains if the spill meets a reportable quantity limit and has gone off our property lines and indicates potential safety and health hazards.

2) SECOND call the National Emergency Response Center **1-800-424-8802**

- Tell them: The information reported to the Ohio Spill Hotline.

3) THIRD if the spill affects the Sanitary Sewer, call the Bowling Green Wastewater Treatment Plant (419-352-2571) immediately so they can control the spill incoming at their location.

4) FOURTH call the Local Emergency Planning Committee, 419-354-9269 or, 419-354-9001 (24 Hour).

5) FIFTH fill in the Environmental Recycling Chemical Spill Reporting Form.

6) WRITTEN REPORT REQUIREMENTS: After the release or discharge, written follow-up emergency notice must be submitted within 30 days to the Ohio EPA Emergency Response Section and the local planning committee of the planning district(s) in which release or discharge occurred, unless the release was from a vessel, and then the report is sent only to the SERC. This follow-up emergency notice is your company's

opportunity to explain in its own words the circumstances and actions relating to the release of pollutants to the environment. Your written emergency notice should follow the questions sequence as indicated below. If any of the questions are not applicable to your incident, indicate N/A (not applicable) for that item.

1. When
   (a) Actual time, date, and duration of the discharge or release.
   (b) Actual time and date of discovery of the release or discharge.
   (c) Actions taken to respond to and contain the release or discharge.
   (d) Indicate the spill number assigned by Ohio EPA. (If you do not know this number, call a duty office during business hours and ask. The telephone number is 614-644-3194). If the National Response Center was notified, please provide their assigned case number.
2. Location
   (a) Location of facility from which the release or discharge occurred.
   (b) Location of release: county, township, and city.
   (c) Longitude and latitude of the release, if known.
   (d) Distance and direction from nearest intersection or milepost if it was a transportation related release or discharge.
3. Product Release
   (a) Common and/or technical name(s) of the material(s) released or discharged and CAS Numbers(s).
   (b) What was the quantity and duration of the discharge? Indicate volume(s) in gallons or pounds.
4. Environmental Impact
   (a) Name of the environmental medium or media affected (i.e. navigable waters, land, and/or air). If navigable waters, please identify.
   (b) What was the length of area of the navigable waterway affected?
   (c) What was the ground surface area (square feet or yards) and depth of soil contamination?
   (d) To the extent information is available, identify damage to wildlife and/or vegetation.
   (e) To the extent information is available, identify impact to human health and safety (i.e. evacuations, exposure, etc..)
   (f) Where appropriate, identify medical advice provided for exposed individuals and or local medical personnel.
5. Monitoring and Detection
   (a) If the release or discharge was monitored, indicate the method of detection and concentrations detected.
   (b) If the release was air-borne, how was the wind direction and speed determined?
   (c) Was the public warned, and if so, how?
6. Mitigation, Containment Action
   (a) How much product or waste was recovered or neutralized?
   (b) How was the material recovered or neutralized?
   (c) Were any other actions taken to reduce the impact of the discharge (containment, adsorbents, on-site treatment, etc.)?
7. Prevention Measures
   Please provide plans to prevent recurrence of the discharge or release which may occur at this specific source. This may include: employee training, replacement of equipment, construction, or security measures such as lighting, fencing or locks.
8. Health Risks

List known or anticipated acute and chronic health risks of exposure associated with the substances which were released.

9. Permit Numbers
   (a) Indicate any air, water, or other permit numbers which may be pertinent to this incident (voluntary information).
   (b) If this is a NPDES/air permit, please enclose a copy of your current effluent/emission limitations.
10. Chronology
    Provide a chronological review of the incident. Include a chronology of communications with state and local government.
11. Documentation
    Provide any reports or other documents which pertain to the incident (e.g. accident reports, manifest, bills of lading, laboratory analyses).
12. Causes
    Describe any extenuating circumstances which caused the discharge.
13. Economic Impact (This information is voluntary)
    (a) Estimate the dollar value, if any, of the spilled product.
    (b) What was the equipment damage cost (estimate)?
    (c) What was the cost of spill cleanup (estimate)?
    (d) What are the estimated costs of spill prevention to eliminate possible reoccurrence of this event? This information is required pursuant to ORC Section 3750.06(D) and OAC Rule 3750-25-25(A)(2).

The written emergency notice must be submitted within 30 days of the release or discharge to:

(a) Ohio EPA, DERR-ER
122 South Front Street
P.O. Box 1049
Columbus, Ohio 43215-1049
ATTN: ER Records Mgmt.
SERC Report
(b) County LEPC Emergency Coordinator

The statute provides that if significant additional information regarding the mandatory or voluntary information submitted becomes known during the period one (1) year after the release or discharge, the owner or operator shall submit to the LEPC and the Ohio EPA an updated written notice within three (3) days after learning of the additional information. If this is the second oil spill release at this location with a 12 month period, or a release of over 1,000 gallons which has reached water, then you must submit a copy of your Spill Prevention Control and Countermeasure Plan (SPCC) to the U.S. EPA Regional Administrator and to Ohio EPA within 60 days from the time of the discharge as required by 40 CFR 112.4. Your SPCC plan may be submitted with your response to the 30-day written follow-up report.

ENVIRONMENTAL RECYCLING
CHEMICAL SPILL REPORTING FORM

A. Facility: Environmental Recycling (ER) Facility Emergency Contact & Phone Number

_____

B. Incident Address City County State Zip

_____

C. Chemical or Trade Name Manufacturer's Name & Address

_____

(attach MSDS, if available)

Physical State
[ ]Solid [ ]Liquid [ ]Gas

Quantity Released Date & Time of Release

_____

Environmental Contamination
[ ]Air [ ]Water [ ]Ground

Duration of Release
Days_____Hours_____Minutes_____

D. Brief Explanation of Incident

_____

_____

_____

E.
# of Injuries Explain: _____
# of Hospitalized Explain: _____
# of Deaths Explain: _____
Property Damage Explain: _____
Did Spill Leave Property? Explain: _____

F. Action Taken

_____

_____

G.
ER Dept.: _____ Govt. Agency: _____
Name & Phone: _____ Name & Phone: _____
Date and Time Notified: _____ Date and Time Notified: _____
Assigned Incident No.: _____

ER Dept.: _____ Govt. Agency: _____
Name & Phone: _____ Name & Phone: _____
Date and Time Notified: _____ Date and Time Notified: _____
Assigned Incident No.: _____

ER Dept.: _____ Govt. Agency: _____
Name & Phone: _____ Name & Phone: _____
Date and Time Notified: _____ Date and Time Notified: _____
Assigned Incident No.: _____

H. Comments - Indicate section (A-G) and provide detailed additional information

_____

_____

_____

I. Facility Representative Completing Form _____ Date _____

CHEMICAL SPILL REPORTING FORM INSTRUCTIONS

Basic Instructions:

This form, when filled out, collects information required for most government agency reporting. Complete the form as thoroughly as possible.

If the incident involves releases of more than one chemical, prepare one report form for each chemical.

If the incident involves a series of separate releases of chemical(s) at different times, the releases should be reported on separate reporting forms.

Specific Instructions:

Item A: Enter the name of the ER facility making the report and the ER emergency contact/phone number at that location.

Item B: Provide information pertaining to the location where the release occurred. Include the street address, county, state, and zip code.

Item C: Provide information concerning the specific chemical that was released and details of the release. Check all categories that apply. Provide the best available information on quantity, time, and duration of the release. Attach MSDS for the released substance if available.

Item D: Indicate what caused the spill and how it occurred.

Item E: Provide an explanation of any health effects or property damage due to the spill.

Item F: Indicate all actions taken to limit the spill and clean up the affected area.

Item G: Enter each ER department or government agency to which a report was made about this incident. In the case of government agencies, they will assign an incident number, which should also be recorded.

Item H: List any additional pertinent information.

Item I: Print or type the name of the facility representative submitting the report.

Submit the completed report to: Paul Cottrell **President, Environmental Recycling.** Ohio requires that you submit a written report within 30 days subsequent to phoning in a spill report.

APPENDIX 8
SPILL RESPONSE PROCEDURES

The Emergency Coordinator will initiate the appropriate emergency response procedures as detailed below:

In all cases the designated person in charge of spill cleanup will take all necessary steps to prevent personnel from being exposed to potentially hazardous chemicals and to ensure that additional spills do not occur, recur or spread to other locations. These methods may include stopping processes and operations, collecting and containing released materials and removing or isolating containers. During the spill response the Emergency Coordinator will monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes or other equipment, whenever appropriate.

Immediately after an emergency the Emergency Coordinator will provide for treatment, storage or disposal of hazardous waste or PCB waste and, if applicable, contaminated soil or surface water or any other materials that result from a release. The Emergency Coordinator will also ensure that all emergency equipment is cleaned or replaced and available for use before waste storage/treatment operations are resumed.

The emergency coordinator will notify State and Local authorities before operations are resumed in the affected area(s) of the facility.

Upon discovery of a spill, internal notification procedures will be activated and the Emergency Coordinator will ensure that the following actions are taken:

1. Protect all personnel by using the personal protective equipment available at the site or assure that personnel are not permitted in the area of potential exposure.

2. Take steps necessary to stop the spill of material, if this can be done without undue risk.

3. Identify the character, exact source, amount and extent of the released materials.

4. Determine if evacuation of the area is necessary. Keep all persons upwind of the spill.

5. Keep sparks, flames and other sources of ignition away from the release.

6. Initiate specific release response procedures for ignitable, corrosive, reactive, toxic or PCB materials, as appropriate. Specific response procedures are available to all personnel and kept on file by the Emergency Coordinator and the General Manager.

7. Dispense emergency response personnel or contractors to the site, if necessary.

8. Cordon off the area, if necessary. Maintain limited access until the entire spill has been cleaned up.

9. Notify federal, state and local authorities, if applicable.

APPENDIX 8 (cont)
FIRE OR EXPLOSION RESPONSE PROCEDURES

In the event of a fire or explosion the emergency response coordinator must immediately identify the exact extent of any released materials. In all cases the designated person will take all necessary steps to prevent personnel from being exposed to potentially hazardous chemicals and to ensure that additional spills do not occur, recur or spread to other locations. These methods may include stopping processes and operations, collecting and containing released materials and removing or isolating containers. During the spill response the Emergency Coordinator will monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes or other equipment, whenever appropriate.

If the emergency coordinator determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside the facility, he or she must report their findings as follows:

(1) If conclude that the evacuation of local areas may be advisable, he or she must immediately notify the local authorities. The emergency coordinator must be available to help local authorities decide weather the local areas should be evacuated.
(2) He or she must immediately notify the Ohio EPA emergency response team using their 24-hr response toll free number **800-282-9378**. This report must include:
- Name and number of reporter
- Name and address of facility
- Time and type of incident
- Name and quantity of material involved, to what extent
- Extent of injures
- Possible hazards to human health, or the environment

Immediately after an emergency the Emergency Coordinator will provide for treatment, storage or disposal of hazardous waste or PCB waste and, if applicable, contaminated soil or surface water or any other materials that result from a release. The Emergency Coordinator will also ensure that all emergency equipment is cleaned or replaced and available for use before waste storage/treatment operations are resumed.

The emergency coordinator will notify State and Local authorities before operations are resumed in the affected area(s) of the facility.

APPENDIX 9

PAST SPILL EXPERIENCE/OPERATING RECORD

This operating record will be used to record any incident (spill, release, fire, or explosion) that requires the implementation of this plan

History of Prior Incidents			
Date/Time	Chemical	Quantity Released	Details

Within fifteen days after an incident Environmental Recycling will submit a written report on the incident to the director. The report will include:

1. The name, address, and telephone number of the owner or operator.
2. The name, address, and telephone number of the facility.
3. The date, time, and type of incident.
4. The name and quantity of the material(s) involved.
5. The extent of injuries if any.
6. An assessment of actual or potential hazards to human health or the environment.
7. The estimated quantity and disposition of recovered material that resulted from the incident

APPENDIX 10

SPILL CLEANUP MATERIALS AND LOCATIONS

Spill clean up materials and locations are as follows:

1. Battery Storage & Sorting
2. PCB Storage
3. Building #1 Loading Docks (Spill Kit, Floor Dry and Spill Mats)
4. Fluorescent Lamp Storage Areas (Mercury Spill Kit and Vacuum)
5. Bulk Mineral Oil Tanks

Spill clean up kits generally consist of:

1. Absorbent materials, dust adhering agents and Hg 102
2. Coveralls
3. Boots
4. Goggles and Safety Glasses
5. Bags and closures
6. Gloves
7. Respirators (air purifying and chemical cartridges for organics and acids)
8. Additional materials such as absorbents and tools may be obtained by contacting the Emergency Coordinator or Shop Supervisor.

APPENDIX 11

ABOVEGROUND STORAGE TANK INSPECTION FORM

Location: _____ Date _____

Inspector _____

Type of Tank: _____

Capacity: _____ gallons (_____ ft. long x _____ ft. diameter)

Visual Inspection -

1. Condition of tank: _____
2. Condition of berm/diking (if applicable) (any visual indication of cracks/ spalling?):

_____

2. Any visual indications of spills or leakage? Yes _____ No _____

If yes, describe _____

_____

_____

_____

3. Stick-gauge reading and product volume (in./gals.): _____

_____

4. Inventory of Spill Control Equipment (Check if supply exists as described):

Absorbent	_____
Boots	_____
Gloves	_____
Coveralls	_____
Shovels	_____
Goggles	_____

5. Check of emergency communications equipment:

Functioning _____ Not Functioning _____

6. Spill reporting and emergency response procedures posted?

Yes _____ No _____

WERE ANY CORRECTIVE ACTIONS TAKEN AS A RESULT OF THIS INSPECTION? _____

_____

FACILITY INSPECTION CHECKLIST

Instructions: This inspection record will be completed every month. Place an X in the appropriate box for each item. If any response requires elaboration, do so in the Descriptions and Comments space provided. Further descriptions or comments should be attached on a separate sheet of paper if necessary.

	Yes	No	Descriptions and Comments
Tank surfaces show signs of leakage	☐	☐	
Tanks are damaged, rusted, or deteriorated	☐	☐	
Bolts, rivets, or seams are damaged	☐	☐	
Tank supports are deteriorated or buckled	☐	☐	
Tank foundations have eroded or settled	☐	☐	
Level gauges or alarms are inoperative	☐	☐	
Vents are obstructed	☐	☐	
Valve seals or gaskets are leaking	☐	☐	
Pipelines or supports are damaged or deteriorated	☐	☐	
Buried pipelines are exposed	☐	☐	
Loading/unloading area is damaged or deteriorated	☐	☐	
Connections are not capped or blank-flanged	☐	☐	
Secondary containment is damaged or stained	☐	☐	
Dike drainage valves are open	☐	☐	
Oil/water separator is functioning properly	☐	☐	
Oil/water separator effluent has a sheen	☐	☐	
Spill containment material are available	☐	☐	
Fencing, gates or lighting is non-functional	☐	☐	
Control Panels are functioning properly	☐	☐	

Remarks: _____

_____

Signature: _____ Date: _____

DRUM AREA INSPECTION FORM*

Location: _____

Date_____

Inspector_____

Number of Drums in the Area_____

1. Are there any indications of spilled material? Yes_____ No_____
2. If yes, what type of material appears to have been spilled?_____
   _____
3. Are all drums in an up-right position or horizontally on racks?
   Yes_____ No_____
4. Do any drums show visible signs of leakage, corrosion, or bulging?
   Yes_____ No_____
5. Is (are) hazardous waste container(s) closed during storage?
   Yes_____ No_____
6. Is (are) hazardous waste container(s) compatible with material(s) stored?
   Yes_____ No_____
7. For new hazardous waste storage, were precautions taken to insure that any incompatible waste(s) or material(s) are not stored in the same container?
   Yes_____ No_____
8. Does sufficient aisle space exist between hazardous waste drums?
   Yes_____ No_____
9. Are all hazardous waste drums clearly marked as "Hazardous Waste" with the beginning date of accumulation indicated (note - storage limited to 180 days)?
   Yes_____ No_____
10. Spill response and emergency response procedures posted?
    Yes_____ No_____
11. Inventory of Spill Control Equipment (Circle items that are present):
    Removable lid drums / absorbent / drain covers / boots / gloves / coveralls / shovels / safety glasses _____

WERE ANY CORRECTIVE ACTIONS TAKEN AS A RESULT OF THIS INSPECTION?_____

_____

*Hazardous waste container storage areas must be inspected at least weekly.

NOTE: Indicate NA if an item does not apply.

APPENDIX 12

DIKE DRAINAGE RECORDS

Instructions: This record will be completed when rainwater or liquid from diked areas is drained into a storm drain or into an open water source, lake, or pond or container. The drainage valve (if any) normally should be sealed (locked) closed and only opened and resealed following drainage under responsible supervision.

Diked Area	Date	Presence of Oil	Time Started	Time Finished	Signature

APPENDIX 13

RECORD OF SPILL PREVENTION BRIEFINGS

Instructions: Briefings will be scheduled and conducted by the owner or operators for operating personnel at intervals frequent enough to assure adequate understanding of the SPCC plan for this facility. These briefings should also highlight and describe known spill events or failures, malfunctioning components, and recently developed precautionary measures. Personnel will also be instructed in operation and maintenance of equipment to prevent the discharges of oil and applicable pollution control laws, rules, and regulations. During these briefings there will be an opportunity for facility operators and other personnel to share recommendations concerning health, safety, and environmental issues encountered during operation of the facility.

Date:

Attendees:

TITLE	SIGNATURE	PRINT NAME
General Manager		
President		
Vice President		

AGENDA TOPICS

Subjects and Issues: _____

_____

_____

Recommendations and Suggestions: _____

_____

_____

Environmental Recycling™

I, _____, have received training on Environmental Recycling's Hazard Communication Program, which includes specifics on the Spill Prevention Control and Countermeasures (SPCC) Plan.

_____ _____

Signature of Employee Date

APPENDIX 14

PRODUCT TRANSFER (LOADING/UNLOADING) PROCEDURES

Appropriate transfer and unloading procedures for the aboveground tanks are:

1. Drain covers are to be placed over all nearby drains or other openings. Additional covers should be available in case of a large spill.

2. Hose couplings are to be checked before filling begins.

3. Spouts are to be labeled to assist in proper identification of tank to be filled.

4. Tank levels are to be measured before the fill in order to ensure sufficient capacity for the intended amount of transfer. Container capacity level will be checked after the fill and recorded. All activities will be in compliance with DOT regulations.

5. A representative of the Environmental Recycling staff is to be available for the entire fill. A telephone is available in the immediate area should it be necessary to call for assistance.

6. Hoses will be checked to assure drainage is complete before disconnection. Dry disconnect couplings will be used whenever possible. Vendors will be encouraged to provide and use same.

7. All activities will be in compliance with DOT regulations.

APPENDIX 15

IMPLEMENTATION SCHEDULE OF ITEMS TO BE INSTALLED AS PART OF THE SPCC PLAN

Item	Deadline for Implementation	Date of Completion	Management Approval – 40 CFR 112.7
1.			
2.			
3.			

APPENDIX 16

EMERGENCY EVACUATION PLAN

Environmental Recycling
Emergency Evacuation Plan

Environmental Recycling Emergency Evacuation Plan has been designed to assist facility managers and employees for protection of life and property in the event of a fire, explosion, spill or other emergency requiring building evacuation.

Building Address: **527 East woodland Circle, Bowling Green, OH 43402**

Emergency Coordinator: **Paul Cottrell**

Emergency Coordinator Phone Number: **419-409-0413**

Designated Meeting Site(s) for Building are:

Directly across the street in front of 504 woodland circle

Plan Prepared By: Todd Hendrick

Date: 8/30/06

EMERGENCY TELEPHONE NUMBERS

NOTIFICATIONS: In the event of a spill of a large amount of material, fuel oil or diesel oil, or a potential leak, notify the following, giving details as requested from the incident report form in Appendix 7:

All emergencies	**911**
1. Ohio EPA - emergency response hotline	1-800-282-9378
2. Bowling Green Fire Division	419-352-3106
3. Local Emergency Planning Committee	419-354-9269 (24 Hour) 419-354-9001
OPTIONAL AND/OR CONDITIONAL NOTIFICATIONS	
4. City of Bowling Green Wastewater Treatment Plant	419-354-6274
5. City of Bowling Green Offices	419-352-2571
6. U.S. EPA National Response Center	1-800-424-8802 1-800-426-2675
7. U.S. EPA (Region V)	1-312-886-6236
8. Wood County Health Department	419-352-8402
9. U.S. Coast Guard	1-419-259-6372 (24 hour) 1-419-259-6448
10. Ohio State Fire Marshall Office Bureau of Underground Storage Tanks (Underground storage tank release only)	1-614-864-5510
11. Ohio Division of Wildlife	1-419-424-5000

Table of Contents

Section I: Purpose and Objectives

Potential emergencies at the Environmental Recycling, such as fire, explosion, spill, chemical releases and all other emergencies require employees to evacuate the building. An Emergency Evacuation Plan (EEP) and adequate occupant familiarity with a building minimize threats to life and property.). This plan applies to all emergencies where employees may need to evacuate for personal safety.

This EEP is intended to communicate the policies and procedures for employees to follow in an emergency situation. This written plan should be made available, upon request, to employees and their designated representatives by the Emergency Coordinator for the building.

Under this plan, employees will be informed of:

- The plan's purpose,
- Preferred means of reporting fires and other emergencies,
- Emergency escape procedures and route assignments,
- Procedures to be followed by employees who remain to control critical plant operations before they evacuate,
- Procedures to account for all employees after emergency evacuation has been completed,
- Rescue and medical duties for those employees who perform them,
- The alarm system.

Paul Cottrell is the Emergency Coordinator for this facility and has overall responsibility for the preparation and implementation of this plan.

Matt Zachary is the 1st Alternate Emergency Coordinator.

Erik Thayer is the 2nd Alternate Emergency Coordinator

The Emergency Coordinator will review and update the plan as necessary. Copies of this plan will be maintained in the facility manager and shop supervisor offices.

Section II: General Guidelines

The following guidelines apply to this EEP:

1. All personnel must be trained in safe evacuation procedures. Refresher training is required whenever the employee's responsibilities or designated actions under the plan change, and whenever the plan itself is changed.
2. The training may include use of floor plans and workplace maps which clearly show the emergency escape routes included in the EEP. No employee is permitted to re-enter the building until advised by the Fire Department.

Section III: Responsibilities of Emergency Coordinator and Safety Monitors

The Emergency Coordinator is responsible for:

1. Obtaining and posting floor plans and route evacuation maps.
2. Overseeing the development, communication, implementation and maintenance of the overall EEP.
3. Ensuring the training of building occupants, and Critical Operations Personnel, and notifying all personnel of changes to the plan.
4. Maintaining up to date lists of building occupants, critical operations personnel, and any other personnel with assigned duties under this plan. Lists are included in Appendix I.
5. In the event of a fire or other emergency, relaying applicable information to emergency personnel, and occupants.
6. Establishing Designated Meeting Sites for evacuees.

The Managers are responsible for:

1. Familiarizing personnel with emergency procedures.
2. Acting as liaison between workers and their work area.
3. Ensuring that occupants have vacated the premise in the event of an evacuation and for checking assigned areas.
4. Knowing where their Designated Meeting Site is and for communicating this information to occupants.
5. Ensuring that disabled persons and visitors are assisted in evacuating the building.
6. Evaluating and reporting problems to the Emergency Coordinator after an emergency event.

Section IV: Alerting or Signaling Building Occupants in Case of Fire or Other Emergency

1. In case of a fire, employees should actuate the nearest fire alarm and/or make a telephone call to the local Fire Department at 9-911. The locations of the fire alarms are noted on the evacuation floor plan in Appendix II. The building alarm alerts building occupants of the need for evacuation and sends a signal to the Fire Department that there is an alarm condition in the building.
2. It may be necessary to shout the alarm, if people are still in the building and the alarm has stopped sounding, or if the alarm does not sound. This can be done while exiting.
3. Persons discovering a **fire, smoky condition, or explosion** should push the appropriate button on the fire alarm. Any pertinent fire or rescue information should be conveyed to the Fire Department. All emergency telephone numbers are listed at the beginning of this EEP.
4. To reporting all other emergencies, employees should State your name, your location, and the nature of the call. Speak slowly and clearly. Wait for the dispatcher to hang up first. On occasion the dispatcher may need additional information or may provide you with additional instructions.

Section V: Evacuation Procedures for Building Occupants

1. When the fire alarm sounds, all personnel should ensure that nearby personnel are aware of the emergency, quickly shutdown operating equipment (e.g., compressed gas cylinders), close doors and exit the building.
2. All occupants should proceed to their Designated Meeting Site and await further instructions from their supervisor or manager.
3. All personnel should know where primary and alternate exits are located, and be familiar with the various evacuation routes available. Floor plans with escape routes, alternate escape routes, and exit locations are located in Appendix II. Designated meeting sites are located in appendix III.

Section VI: Disabled Occupants

If a disabled occupant is unable to exit the building unassisted, the supervisors or managers must notify the emergency response personnel of the person's location. Unless imminent life-threatening conditions exist in the immediate area occupied by a non-ambulatory or disabled person, relocation of the individual should be limited to a safe area.

Section VII: Accountability Procedures for Emergency Evacuation

Designated Meeting Site: Groups working together on or in the same area should meet outside the building in the prearranged Designated Meeting Site

Department Organization List: A roster of personnel to ensure that everyone has evacuated has been developed by the Emergency Coordinator. The list will be updated whenever there is a personnel change.

Managers are assigned by the Emergency Coordinator and will conduct head counts once evacuation has been completed. There is at least one manager per building to provide adequate guidance and instruction at the time of an emergency.

The managers and supervisors are to be trained in the complete workplace layout and the various primary and alternate escape routes from the workplace. All trained personnel are made aware of employees with disabilities that may need extra assistance and of hazardous areas to be avoided during emergencies. Before leaving, the managers and supervisors are to check rooms and other enclosed spaces in the workplace for other employees who may be trapped or otherwise unable to evacuate the area, and convey this information to emergency personnel.

Once each evacuated group of employees have reached their Designated Meeting Site, each Manager:

1. Assembles his/her group in the Designated Meeting Site.
2. Takes head count of his or her group.
3. Assumes role of department contact to answer questions.
4. Instructs personnel to remain in area until further notice.
5. Reports status to Emergency Coordinator or Incident Commander.
6. Instructs personnel to remain at Designated Meeting Site until further notice.

Section VIII: Rescue and Medical Duties

- The Fire Department, Emergency Medical Technicians (EMT) will conduct all rescue and medical duties.
- Do not move injured personnel. Keep the person lying down, covered and warm.
- **First Aid:** The staff members at Environmental Recycling are trained in basic first aid. All injuries beyond first aid should be addressed to professional help.

Section IX: Resource and Responsibilities Lists

EEP Organization: The lists in Appendix I include the names of employees, managers, staff or other personnel and their job titles, job positions and relative EEP collateral duties. The purposes served by the lists are:

1. To tell employees who to see for additional information on the EEP.
2. To provide emergency response personnel with a list of department personnel which may be needed in order to provide additional information about the fire, a chemical, a hazardous waste location, a shipment of chemicals, etc.
3. The lists should be updated by the Emergency Coordinator on an as-needed basis.

Section X: Training and Communications

Each occupant should know that evacuation is necessary and what his/her role is in carrying out the plan. Employees should also know what is expected of them during an emergency to assure their safety.

A method of training building occupants in the requirements of the emergency evacuation plan is to give all employees a thorough briefing and demonstration. Annual practice drills are to be implemented and documented by the Emergency Coordinator.

A Training Attendance Record Sheet is included in Appendix I. This record should be maintained by the Emergency Coordinator for a period of five (5) years.

Appendix I

EMERGENCY EVACUATION PLAN RESPONSIBILITIES LIST

Building Name: Environmental Recycling

Address: 527 East Woodland Circle

Telephone 419-354-6110

Title	Name	Location	Phone
Emergency Coordinator	Paul Cottrell	Front office	419-409-0413
1st Alternate Emergency Coordinator	Matt Zachary	Front office	419-409-1004
2nd Alternate Emergency Coordinator	Erik Thayer	Front Office	419-409-0415
Total Number of Employees: 20			

Emergency Evacuation Plan Training Log

Name (print)	*Signature*	*Job Title*

Instructor _____ *Environmental Recycling.* Date: _____

Appendix II

- Primary and Secondary Emergency Evacuation Routes
- Building Floor Plan
- Fire alarm locations
- Exits
- Evacuation map

Appendix III

Area Evacuation Plan

Environmental Recycling

Primary Evacuation Route: Through the doors located in all corners of each building

Secondary Evacuation Route: Through large bay doors. One located in each building

Designated Meeting Site: Directly across the street at 504 Woodland circle in front of the building.

Facility Manager: Matt Zachary

Emergency Coordinator for the building: Paul Cottrell, President

EVACUATION PLAN

LEGEND

Spill Material

Bulk Non-PCB
nsformerOil Storage

Drain

Dock Drain

Gate Value Shut
Off to Main

Overhead Door

Regulated Area

Fire Extinguisher
Locations

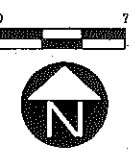
EXIT
Exit Locations

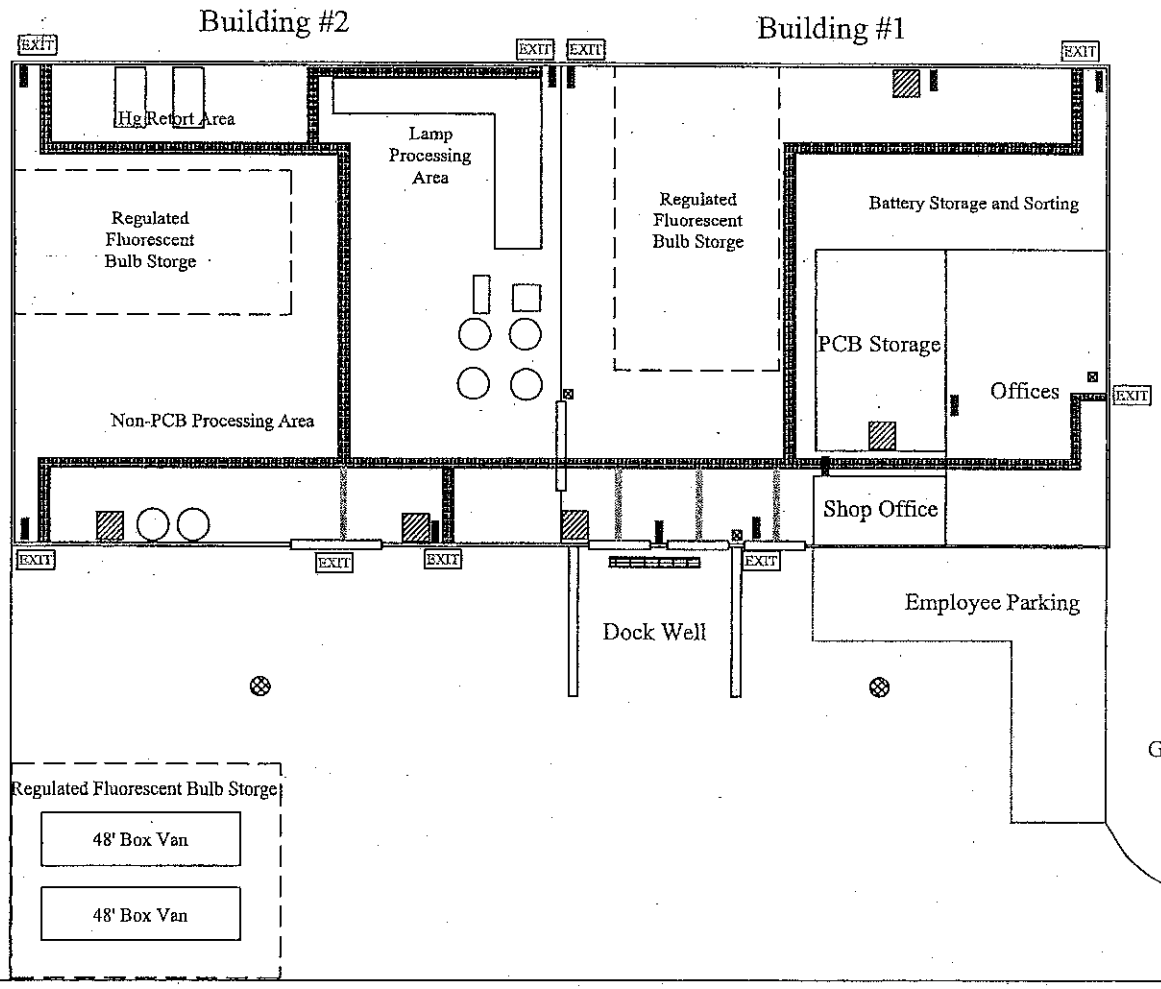
ıary Evacuation Route

econdary Evacuation
Route

ire Alarm Locations

SCALE





Woodland Circle

Evacuation Plan
Environmental Recycling
Bowing Green, Ohio

Property
Evacuation
Plan

Figure 1

APPENDIX 17

HOSPITAL NOTIFICATION

Hazardous Material Managed at the Facility

ENVIRONMENTAL RECYCLING
P.O. Box 167
527 East Woodland Circle
Bowling Green, Ohio 43402
OHR000034025
800-284-9107
Fax-419-354-5110

Date:

September 2006

Environmental Recycling™

To Whom It May Concern:

The following pages contain pertinent information in regards to the material Environmental Recycling handles. As required by the EPA we have included a detailed overview of the hazardous material that may be on our site and the types of injuries or illnesses which could result from a fire, explosion, or release. The two types of material considered to be hazardous at Environmental Recycling are Polychlorinated biphenyls (PCB) and Mercury (HG). PCB's can be found in many items such as transformers, capacitors, and other electrical equipment. Mercury can be found in light bulbs, thermostats, and many other devices including thermometers. The information attach was obtained form the Agency for Toxic Substances and Disease Registry (ATSDR). If you have any questions please feel free to contact us.

Sincerely,

Paul Cottrell
President

P.O. Box 167 • 527 East Woodland Circle • Bowling Green, Ohio 43402 • Phone 419-354-8110 • (800) 284-9107 • Fax 419-354-5110

PCB

HIGHLIGHTS: Polychlorinated biphenyls (PCBs) are a mixture of individual chemicals which are no longer produced in the United States, but are still found in the environment. Health effects that have been associated with exposure to PCBs include acne-like skin conditions in adults and neurobehavioral and immunological changes in children. PCBs are known to cause cancer in animals.

What are polychlorinated biphenyls (PCBs)?

Polychlorinated biphenyls are mixtures of up to 209 individual chlorinated compounds. There are no known natural sources of PCBs. PCBs are either liquids or solids that are colorless to light yellow. Some PCBs can exist as a vapor in air. PCBs have no known smell or taste. Many commercial PCB mixtures are known in the U.S. by the trade name Aroclor.

PCBs have been used as coolants and lubricants in transformers, capacitors, and other electrical equipment because they don't burn easily and are good insulators. The manufacture of PCBs was stopped in the U.S. in 1977 because of evidence they build up in the environment and can cause harmful health effects. Products made before 1977 that may contain PCBs include old fluorescent lighting fixtures and electrical devices containing PCB capacitors, and hydraulic oils.

What happens to polychlorinated biphenyls (PCBs) when they enter the environment?

- PCBs entered the air, water, and soil during their manufacture, use, and disposal; from accidental spills and leaks during their transport; and from leaks or fires in products containing PCBs.
- PCBs can still be released to the environment from hazardous waste sites; illegal or improper disposal of industrial wastes and consumer products; leaks from old electrical transformers containing PCBs; and burning of some wastes in incinerators.
- PCBs do not readily break down in the environment and thus may remain there for very long periods of time. PCBs can travel long distances in the air and be deposited in areas far away from where they were released. In water, a small amount of PCBs may remain dissolved, but most stick to organic particles and bottom sediments. PCBs also bind strongly to soil.
- PCBs are taken up by small organisms and fish in water. They are also taken up by other animals that eat these aquatic animals as food. PCBs accumulate in fish and marine mammals, reaching levels that may be many thousands of times higher than in water.

How can polychlorinated biphenyls (PCBs) affect my health?

The most commonly observed health effects in people exposed to large amounts of PCBs are skin conditions such as acne and rashes. Studies in exposed workers have shown changes in blood and urine that may indicate liver damage. PCB exposures in the general population are not likely to result in skin and liver effects. Most of the studies of health effects of PCBs in the general population examined children of mothers who were exposed to PCBs.

Animals that ate food containing large amounts of PCBs for short periods of time had mild liver damage and some died. Animals that ate smaller amounts of PCBs in food over several weeks or months developed various kinds of health effects, including anemia; acne-like skin conditions; and liver, stomach, and thyroid gland injuries. Other effects of PCBs in animals include changes in the immune system, behavioral alterations, and impaired reproduction. PCBs are not known to cause birth defects.

How likely are polychlorinated biphenyls (PCBs) to cause cancer?

Few studies of workers indicate that PCBs were associated with certain kinds of cancer in humans, such as cancer of the liver and biliary tract. Rats that ate food containing high levels of PCBs for two years developed liver cancer. The Department of Health and Human Services (DHHS) has concluded that PCBs may reasonably be anticipated to be carcinogens. The EPA and the International Agency for Research on Cancer (IARC) have determined that PCBs are probably carcinogenic to humans.

How do polychlorinated biphenyls (PCBs) affect children?

Women who were exposed to relatively high levels of PCBs in the workplace or ate large amounts of fish contaminated with PCBs had babies that weighed slightly less than babies from women who did not have these exposures. Babies born to women who ate PCB-contaminated fish also showed abnormal responses in tests of infant behavior. Some of these behaviors, such as problems with motor skills and a decrease in short-term memory, lasted for several years. Other studies suggest that the immune system was affected in children born to and nursed by mothers exposed to increased levels of PCBs. There are no reports of structural birth defects caused by exposure to PCBs or of health effects of PCBs in older children. The most likely way infants will be exposed to PCBs is from breast milk.

How can families reduce the risk of exposure to polychlorinated biphenyls (PCBs)?

- You and your children may be exposed to PCBs by eating fish or wildlife caught from contaminated locations.
- Children should be told not play with old appliances, electrical equipment,

or transformers, since they may contain PCBs.

- Children should be discouraged from playing in the dirt near hazardous waste sites and in areas where there was a transformer fire. Children should also be discouraged from eating dirt and putting dirty hands, toys or other objects in their mouths, and should wash hands frequently.
- If you are exposed to PCBs in the workplace it is possible to carry them home on your clothes, body, or tools. If this is the case, you should shower and change clothing before leaving work, and your work clothes should be kept separate from other clothes and laundered separately.

Is there a medical test to show whether I've been exposed to polychlorinated biphenyls (PCBs)?

Tests exist to measure levels of PCBs in your blood, body fat, and breast milk, but these are not routinely conducted. Most people normally have low levels of PCBs in their body because nearly everyone has been environmentally exposed to PCBs. The tests can show if your PCB levels are elevated, which would indicate past exposure to above-normal levels of PCBs, but cannot determine when or how long you were exposed or whether you will develop health effects.

References

Agency for Toxic Substances and Disease Registry (ATSDR). 2000. Toxicological Profile for polychlorinated biphenyls (PCBs). Atlanta, GA: U.S. Department of Health and Human Services, Public Health Service.

Where can I get more information?

ATSDR can tell you where to find occupational and environmental health clinics. Their specialists can recognize, evaluate, and treat illnesses resulting from exposure to hazardous substances. You can also contact your community or state health or environmental quality department if you have any more questions or concerns.

For more information, contact:

Agency for Toxic Substances and Disease Registry

ToxFAQs™
for
Mercury
(Mercurio)

CAS# 7439-97-6

This fact sheet answers the most frequently asked health questions about mercury. For more information, you may call the ATSDR Information Center at 1-888-422-8737. This fact sheet is one in a series of summaries about hazardous substances and their health effects. This information is important because this substance may harm you. The effects of exposure to any hazardous substance depend on the dose, the duration, how you are exposed, personal traits and habits, and whether other chemicals are present.

HIGHLIGHTS: Exposure to mercury occurs from breathing contaminated air, ingesting contaminated water and food, and having dental and medical treatments. Mercury, at high levels, may damage the brain, kidneys, and developing fetus. This chemical has been found in at least 714 of 1,467 National Priorities List sites identified by the Environmental Protection Agency.

What is mercury?

Mercury is a naturally occurring metal which has several forms. The metallic mercury is a shiny, silver-white, odorless liquid. If heated, it is a colorless, odorless gas.

Mercury combines with other elements, such as chlorine, sulfur, or oxygen, to form inorganic mercury compounds or "salts," which are usually white powders or crystals. Mercury also combines with carbon to make organic mercury compounds. The most common one, methylmercury, is produced mainly by microscopic organisms in the water and soil. More mercury in the environment can increase the amounts of methylmercury that these small organisms make.

Metallic mercury is used to produce chlorine gas and caustic soda, and is also used in thermometers, dental fillings, and batteries. Mercury salts are sometimes used in skin lightening creams and as antiseptic creams and ointments.

back to top

What happens to mercury when it enters the environment?

- Inorganic mercury (metallic mercury and inorganic mercury compounds) enters the air from mining ore deposits, burning coal and waste, and from manufacturing plants.
- It enters the water or soil from natural deposits, disposal of wastes, and volcanic activity.
- Methylmercury may be formed in water and soil by small organisms called bacteria.
- Methylmercury builds up in the tissues of fish. Larger and older fish tend to have the highest levels of mercury.

back to top

How might I be exposed to mercury?

- Eating fish or shellfish contaminated with methylmercury.
- Breathing vapors in air from spills, incinerators, and industries that burn mercury-containing fuels.
- Release of mercury from dental work and medical treatments.
- Breathing contaminated workplace air or skin contact during use in the workplace (dental, health services, chemical, and other industries that use mercury).
- Practicing rituals that include mercury.

back to top

How can mercury affect my health?

The nervous system is very sensitive to all forms of mercury. Methylmercury and metallic mercury vapors are more harmful than other forms, because more mercury in these forms reaches the brain. Exposure to high levels of metallic, inorganic, or organic mercury can permanently damage the brain, kidneys, and developing fetus. Effects on brain functioning may result in irritability, shyness, tremors, changes in vision or hearing, and memory problems.

Short-term exposure to high levels of metallic mercury vapors may cause effects including lung damage, nausea, vomiting, diarrhea, increases in blood pressure or heart rate, skin rashes, and eye irritation.

back to top

How likely is mercury to cause cancer?

There are inadequate human cancer data available for all forms of mercury. Mercuric chloride has caused increases in several types of tumors in rats and mice, and methylmercury has caused kidney tumors in male mice. The EPA has determined that mercuric chloride and methylmercury are possible human carcinogens.

back to top

How does mercury affect children?

Very young children are more sensitive to mercury than adults. Mercury in the mother's body passes to the fetus and may accumulate there. It can also can pass to a nursing infant through breast milk. However, the benefits of breast feeding may be greater than the possible adverse effects of mercury in breast milk.

Mercury's harmful effects that may be passed from the mother to the fetus include brain damage, mental retardation, incoordination, blindness, seizures, and inability to speak. Children poisoned by mercury may develop problems of their nervous and digestive systems, and kidney damage.

back to top

How can families reduce the risk of exposure to mercury?

Carefully handle and dispose of products that contain mercury, such as thermometers or fluorescent light bulbs. Do not vacuum up spilled mercury, because it will vaporize and increase exposure. If a large amount of mercury has been spilled, contact your health department. Teach children not to play with shiny, silver liquids.

Properly dispose of older medicines that contain mercury. Keep all mercury-containing medicines away from children.

Pregnant women and children should keep away from rooms where liquid mercury has been used.

Learn about wildlife and fish advisories in your area from your public health or natural resources department.

back to top

Is there a medical test to show whether I've been exposed to mercury?

Tests are available to measure mercury levels in the body. Blood or urine samples are used to test for exposure to metallic mercury and to inorganic forms of mercury. Mercury in whole blood or in scalp hair is measured to determine exposure to methylmercury. Your doctor can take samples and send them to a testing laboratory.

back to top

Has the federal government made recommendations to protect human health?

The EPA has set a limit of 2 parts of mercury per billion parts of drinking water (2 ppb).

The Food and Drug Administration (FDA) has set a maximum permissible level of 1 part of methylmercury in a million parts of seafood (1 ppm).

The Occupational Safety and Health Administration (OSHA) has set limits of 0.1 milligram of organic mercury per cubic meter of workplace air (0.1 mg/m^3) and 0.05 mg/m^3 of metallic mercury vapor for 8-hour shifts and 40-hour work weeks.

back to top

References

Agency for Toxic Substances and Disease Registry (ATSDR). 1999. Managing Hazardous Materials Incidents. Volume III – Medical Management Guidelines for Acute Chemical Exposures: Mercury. Atlanta, GA: U.S. Department of Health and Human Services, Public Health Service.

Agency for Toxic Substances and Disease Registry (ATSDR). 1999. Toxicological Profile for mercury. Atlanta, GA: U.S. Department of Health and Human Services, Public Health Service.

back to top

Where can I get more information?

ATSDR can tell you where to find occupational and environmental health clinics. Their specialists can recognize, evaluate, and treat illnesses resulting from exposure to hazardous substances. You can also contact your community or state health or environmental quality department if you have any more questions or concerns.

Environmental Recycling™

12/19/06

Wood County Hospital
Ready Works
950 West Wooster
Bowling Green, OH 43402
419-354-8970

Ohio Administrative Code: Rule 3745-54-37(A) (4)

Arrangements with local Hospitals

To Whom It May Concern:

This information packet contains the Material Safety Data Sheets (MSDS) to wastes that may be considered hazardous at Environmental Recycling. The purpose of this packet is to inform Wood County Hospital, Ready Works Division of the hazards associated with the material at our facility. The information provided also contains types of injuries or illnesses that could result from fires, explosions, or releases at the facility.

Sincerely,

Todd Hendrick
Safety Officer

Please sign below indicating receipt of this information packet.

Name: Deb Bruederle

Title: Director of Occupational Health

Date: 12/28/06

SECTION E

DISPOSAL OF PCB WASTE INVENTORY

The information in this section is submitted in accordance with the requirements of 40 CFR 761.65(e)(1)(iii) and provides an estimate of the maximum inventory of PCB wastes that could be handled at one time at the facility over its active life and a detailed description of the methods or arrangements to be used during closure for removing, transporting, storing, or disposing of the ER Commercial PCB Storage Facility's inventory of PCB waste, including the identification of off-site facilities that will be used for disposal.

TABLE OF CONTENTS

APPENDICES

E-1 INTRODUCTION

As indicated in Section A, ER operations are focused on providing their customers with services pertaining to the management of their fluorescent lights/Universal wastes and PCB materials to assure compliance with all applicable local, state, and federal regulations. The range of operations is mainly EPA Region V.

ER services both large and small PCB waste generators and accepts only those PCB wastes which are within its storage and handling abilities.

E-2 MAXIMUM INVENTORY

The maximum inventory of PCB wastes was determined by assuming that the types of wastes and quantities of PCB's received are based on the maximum containers allowed within the PCB storage area. The estimated maximum inventory of PCB waste types and quantities is as follows: (items will vary)

PCB Articles:	**Qt/Units**
PCB Article Containers/liquids [Approximately 750 pounds or 340 kilograms per drum] *(PCB Storage Area)*	80 drums
PCB Transformers/Large Capacitors	maximum 500 gallons liquid

The PCB items in storage will vary throughout the use of the facility. The items will be a variety of the list below but will never exceed the capacity of our storage area:

- Drums of PCB liquids (55/gallon or 85/gallon overpack)
- Drums of PCB ballast's (55/gallon or 85/gallon overpack)
- Drums of PCB capacitors (55/gallon or 85/gallon overpack)
- Drums of solids/debris PCB (55/gallon or 85/gallon overpack)
- Large PCB Capacitors non-leaking on pallets
- PCB transformers non-leaking
- PCB electrical equipment non-leaking
- PCB water for aqueous/organic separation
- Broker waste from generators site utilizing a manifest with ER as designated TDSF and signing off of the manifest at site and remanifesting to a PCB disposal facility as ER waste. This is needed to assist with the backlogs of the incinerators and assist small companies in quickly and environmentally sound practice of disposing of PCB materials properly. ER has slots for disposal at all of the PCB disposal facilities to assist with this option.

E-3 DISPOSAL OF INVENTORY

ER does not have a definite final closure date; however, the date of closure is estimated to be the year 2020. ER will notify the Regional Administrator or Director at least 60 days prior to the date on which final closure of its Commercial PCB Storage Facility is expected to begin. No PCB wastes will be received by ER 30 days prior to this estimated final closure date. Within 90 days of having received the final quantity of PCB's, ER will have removed all PCB wastes from this facility. Final closure of this facility will be within 180 days of having received the final quantity of PCB wastes. Within 60 days of completion of closure of the ER Commercial PCB Storage Facility, ER will submit to the Regional Administrator or Director, by registered mail, a certification signed by the owner and by an independent, registered professional engineer which states that the ER PCB storage area has been closed in accordance with the approved closure plan. Appendix E.I outlines the tasks to be accomplished for closure and provides an approximate schedule of final closure activities.

ER will submit to the Regional Administrator or Director a written request whenever there is a need for a modification to its approved closure plan.

ER does not treat the PCB wastes prior to the wastes being shipped for disposal; however, containerized PCB Fluorescent Light Ballasts, received from various sources, are bulked into PCB DOT containers. ER currently uses the following PCB services:

~~Chemical Waste Management — Landfill~~
~~Emelle Facility~~
~~Alabama Hwy. 17 at Mile Marker 162~~
~~Emelle, Alabama 35459~~

Chemical Waste Management — Landfill
1550 Balmer Road
Model City, New York 14107

~~USPCI — Landfill~~
~~Grassey Mountain Facility~~
~~3 Miles East, 7 Miles North of~~
~~Knolls, Utah (Exit 41 on I-80)~~

~~U.S. Ecology — Landfill~~
~~P.O. Box 578~~
~~Beatty, Nevada 89003~~

~~APTUS~~ **Clean Harbors** Highway 169 North P.O. Box 1328 Coffeyville, Kansas 67337	Incinerator
~~Rollins Environmental~~ **Clean Harbors** P.O. Box 609 Deer Park, Texas 77536	Incinerator & Cleanup Contractor
TCI, Inc. 101 Parkway East Pell City, AL 35125	Reclamation
Clean Harbors **1672 Highland Road** **Twinsburg, OH 44087-2219**	**Reclamation**
Clean Harbors **1302 West 38th Street** **Ashtabula, OH 44004-5434**	**Incineration/** **Dechlorination**
Wayne Disposal (EQ) **49350 N Interstate 94 Service** **Belleville, MI 48111-1854**	**Landfill**
Veolia **5959 Memorial Blvd** **Port Arthur, TX 77640**	**Incineration**
Lighting Resources **498 Park 800 Drive** **Greenwood, IN 46143**	**Reclamation**
Lighting Resources **1522 East Victory Street** **Phoenix, AZ 85040**	**Reclamation**

ER understands that it is considered the generator for all PCB wastes shipped off-site during closure and will comply with all aspects of the manifesting procedures as listed in 40 CFR 761.207.

During closure ER will contact the aforementioned incinerator and landfill services to obtain a PCB disposal-site approval number and ship the PCB wastes off-site within the 90-day period specified in 40 CFR 761.65 (e)(6)(iii). Assuming no unforeseeable circumstances, the incineration capacities and the land disposal capacities of facilities listed above should not decrease.

APPENDIX E.I

APPENDIX E.1
SCHEDULE OF FINAL CLOSURE

DAYS	-60	-30	0	30	60	90	120	150	180	240
Notification	X									
Final PCB Wastes Received			X							
Arrangements for PCB disposal Initiated		X								
Start of Closure			X							
Last volumes of PCB Wastes Shipped Off-site				X						
Initial Site Investigation and Screening Samples					X					
Decontamination (if required) Begins						X				
Verification Sampling							X			
Disposal of Rinse Waters							X			
Completion of Closure								X		
Closure Certification									X	

SECTION F
CLOSURE PLAN SAMPLING, DECONTAMINATION, AND COMPLIANCE WITH THE SPILL CLEANUP POLICY

The information in this section is submitted in accordance with the requirements of 40 CFR 761.65 (e)(1)(iv) and provides the closure sampling plan; decontamination procedures and verification sampling, if required; other closure activities; schedule for closure; modifications to closure plans; clean closure certification; and the application cleanup standard to be applied to the ER Commercial PCB Storage Facility.

TABLE OF CONTENTS

TABLE OF CONTENTS
(continued)

F-1 IDENTIFICATION AND CLASSIFICATION OF ITEMS TO BE DECONTAMINATED

ER is located along Dunbridge Road industrial corridor which stretches north from Wooster Road to Poe Road. Several large industrial complexes are located approximately 100 yards to the west. The ER Commercial PCB Storage Facility is completely covered and contained, and it is unlikely that any PCB's will be released into the environment. The areas of immediate concern are the interior Commercial PCB Storage Facility and the interior Receiving Area. The Commercial PCB Storage Facility is of concern since both incoming and outgoing PCB liquid, solid, and other PCB wastes move through this area. The interior Commercial PCB Storage Facility area can be classified as having both high-contact and low-contact industrial surfaces. The Commercial PCB Storage Facility area is 40' 5" X 27' 8" X 9". The receiving area is 14-foot by 45-foot. (Plastic lining is always laid down receiving and transfer into storage area. This eliminates any exposure to PCB's). The ER Commercial PCB Storage Facility is a roofed and totally enclosed area within the ER building complex. The equipment used to handle the PCB articles and containers will be disposed of in a PCB landfill rather than decontamination. The disposal costs are included in Chapter 3.

F-1a PCB Storage Area

The PCB Storage Area is an enclosed diked area within the ER Commercial PCB Storage Facility. This area has 6-inch-high steel plate angle reinforced into the concrete and sealed at the concrete base eliminating any leaks along with a sealed concrete floor. The floors and steel plate angle dike walls to a height of 9 inches are coated and sealed with a non-porous epoxy polyurethane sealer. The containment volume for this area 40'5" X 27'8''X9" is approximately 6270 gallons. The total internal volume of all containers that will hold liquid in this area is 4900 gallons. The total internal volume of the largest container that will hold liquid in this area is 500 gallons, providing a containment ratio greater than the prescribed 2.0 (containment ratio = volume of containment/total internal volume of containers stored in contained area). The containment volume of this area is greater than two times the volume of the largest PCB Article or PCB Container stored in this area or greater than 25 percent of the total internal volume of all PCB Articles or PCB Containers stored in this area. All sealed dike/floor and sealed mitered wall/floor joints are smooth and continuous, and the area is regularly inspected to ensure that there has not been a breakdown in the integrity of the containment areas.

F-1b PCB Receiving

The PCB Receiving Area is enclosed on the west side by a sealed continuous mitered floor/concrete-wall joint. All sealed curb/floor and sealed mitered wall/floor joints are smooth and continuous, and the area is regularly inspected to ensure that there has not been a breakdown in the integrity of the containment areas.

Procedures

Statistical sampling, decontamination activities (if required), and verification sampling procedures will be performed in these areas. All those areas below 6 feet within the ER Commercial PCB Storage Facility will be treated as high-contact industrial surfaces requiring a cleanup standard of 10 ug/100 cm^2 (as measured by standard wipe tests).

A pre-cleanup survey and screening sampling plan will be used to determine those areas within ER Commercial PCB Storage Facility which require decontamination (if any). Random sample locations will be chosen so that all of the containment surfaces have an equal chance of being selected. To choose the sampling locations, the height (to 6 feet) and total perimeter of the walls within ER Commercial PCB Storage Facility will be measured in feet. Two random numbers, which are between zero and the total perimeter and between zero and the height and which represent the distance along the length and height of the walls to 6 feet, will be generated. A sample will be collected at this location. To choose the floor sampling locations, the width and length of the ER Commercial PCB Storage Facility floor area will be measured in feet. Two random numbers, which are between zero and the length and between zero and the width and which represent the distance along the length and width of the floor area, will be measured. A wipe sample will be collected at this location. If wipe samples indicate area(s) with PCB concentrations above the regulated levels, statistical sampling grids based on a sampling scheme adapted from the Midwest Research Institutes "Verification of PCB Spill Cleanup by Sampling and Analysis" and "Field Manual for Grid Sampling of PCB Spill Sites to Verify Cleanup" documents will be developed for these areas. Those wipe-sample areas indicating PCB concentrations above the 10 µg/100 cm^2 standard will be decontaminated with appropriate PCB soluble cleaners and re-sampled to verify compliance with the cleanup standard.

F-1c Concrete Access Approach Apron

The exterior east Concrete Access Approach Apron can be classified as high-contact industrial surfaces. The area of immediate concern is the concrete surface over which vehicles entering and leaving the covered ER Commercial PCB Storage Facility traverse. Since PCB materials have been associated with this areas, the numerical standards, the statistical sampling program, the decontamination procedures (if required), and the verification procedures necessary to certify the closure of these Concrete Access Approach Aprons will be performed in this area.

Procedures

A pre-cleanup survey and screening sampling plan will be used to determine those areas within the Concrete Access Approach Apron which require decontamination (if any). Random sample locations will be chosen so that all of the concrete surfaces have an equal chance of being selected. To choose the surface sampling locations, the width and length of the Concrete Access Approach Apron will be measured in feet. Two random numbers, which are between zero and the length and between zero and the width and which represent the distance along the length and width of the Concrete Access Approach Apron area, will be measured. A scrape (or destructive) sample will be collected at this location. If scrape/destructive samples indicate area(s) with PCB concentrations above the regulated levels, statistical sampling grids based on a sampling scheme adapted from the Midwest Research Institutes "Verification of PCB Spill Cleanup by Sampling and Analysis" and "Field Manual for Grid Sampling of PCB Spill Sites to Verify Cleanup" documents will be developed for these areas. Those scrape/destructive-sample areas indicating PCB concentrations at or above 10 ppm, will be removed to a licensed PCB landfill for disposal and the area will be re-sampled to verify compliance with the cleanup standard.

F-2 NUMERICAL STANDARDS

All areas within the ER Commercial PCB Storage Facility contain high-contact and low-contact industrial surfaces that will be considered non-restricted access areas and will require that the numerical concentration levels for PCB's on surfaces in these areas be below the 10 ug/100 cm^2 standard (as measured by standard wipe tests) to be considered "clean." The exterior PCB Storage Area contains a high-contact industrial surface and will require that the numerical concentration levels for PCB's on (or in) the concrete surface in this area be below the 10 ppm standard (as measured by standard scrape/destructive tests) to be considered clean. PCB levels on exterior surfaces above the regulated level are not expected.

F-3 STATISTICAL SAMPLING PROGRAM

All of Section F, Closure Plan Sampling, Decontamination, Compliance With The Spill Cleanup Policy (etc.) is written with the understanding that a third party other than ER may be responsible for the closing of the ER interior Commercial PCB Storage Facility and interior receiving area.

F-4 PRE-CLEANUP SURVEY AND SAMPLING

F-4a ER COMMERCIAL STORAGE FACILITY (Interior)

During the pre-cleanup and sampling planning, the survey/sampling team will be collecting a total of 85 pre-cleanup screening samples throughout the interior ER Commercial PCB Storage Facility. Twenty-three (24) of the 85 wipe samples will be selected on a purely discretionary basis, using visible signs of discoloration or similar indicators to select what appears to be contaminated areas. The remaining 61 samples include randomly selected points and suspect areas within the confines of the ER Commercial PCB Storage Facility. (Note: Suspect samples are included in the sampling protocols and closure cost estimates but will only be used if the investigative team find more than the 4 areas requiring discretionary sampling.) A more detailed discussion of the pre-cleanup survey and sampling procedures is provided in sections below.

F-4b CONCRETE ACCESS APPROACH APRON (Exterior)

During the pre-cleanup and sampling planning, the survey/sampling team will be collecting a total of 12 pre-cleanup screening samples in the Concrete Access Approach Apron. Two (2) of the 12 scrape/destructive samples will be selected on a purely discretionary basis for each area (a total of four [4] discretionary samples), using visible signs of discoloration or similar indicators to select what appears to be contaminated areas. Four (4) of the samples in the Concrete Access Apron will be core samples for porous surfaces as described in 40 CFR Section 761.265. The remaining samples will be randomly selected points within the confines of the Concrete Access Approach Apron. (Note: Suspect samples are included in the sampling protocols and closure cost estimates but will only be used if the investigative team find more than the four [4] areas requiring discretionary sampling.) A more detailed discussion of the pre-cleanup survey and sampling procedures is provided in sections below.

F-5 THE SAFETY PLAN

F-5a Introduction

This part of Section F is written to inform the survey/sampling team and the decontamination team of the potential hazards associated with PCB's and to establish standard operational procedures that are protective of both the workers' safety and the environment. The abbreviation "PCB's" refers to polychlorinated biphenyl's. PCB's are a family of man-made chemicals that contain 209 individual compounds. Because of their insulating and nonflammable properties, they have been used widely as coolants and lubricants in transformers, capacitors, and other electrical equipment. The industrial manufacture of PCB's was stopped in the United States in October 1970 because it had been discovered that PCB's would accumulate and persist in the environment and could cause toxic effects. Some commercial PCB mixtures are known in the United States by their industrial trade name, Aroclor.

F-5b Emergency Information

To respond quickly and appropriately to any expected or unexpected emergency during closure at ER requires the coordinated effort of a number of well-informed and trained individuals. The numbers given below for the ER health and safety officer(s) is assuming that ER will be managing the closure effort. If a third party is responsible for closure, the name and emergency numbers for the health and safety officer(s) will be modified to be reflective of this change.

~~Erik Thayer~~
Paul Cottrell
Health and Safety Officer
419-354-6110

~~Mike Dolkowski~~
Erik Thayer
Assistant Health and Safety Officer
419-354-6110

~~Paul Cottrell~~
Matt Zachary
Assistant Health and Safety Officer
419-354-6110

Ambulance Service	911
Fire Department	911
Police Department	911

F-5c Component Data

ER accepts only PCB wastes into its Commercial PCB Storage Facility. It is assumed that the types of PCB's that will be present on the ER site, as reflected in the maximum inventory (Section E, E-2, Maximum Inventory), would fall within the scope of the following common Aroclors:

Aroclor-1016
Aroclor-1221
Aroclor-1232
Aroclor-1242
Aroclor-1248
Aroclor-1254
Aroclor-1260

F-5d Health Hazard Data

The primary routes of exposure to PCB's are inhalation, ingestion, and skin/eye contact. The potential for exposure to PCB's is minimal, since the PCB wastes, if present, will be contained within approved U. S. Department of Transportation (DOT) containers or bulk storage tanks reviewed in accordance with OSHA regulations 29 CFR 1910.106. However, this will not preclude the use of external body protection during the site investigation, sampling, and decontamination. PCB's are considered moderately toxic by ingestion. PCB's are suspected human carcinogens. Experimentally, PCB's have been shown to be carcinogens and tumorigens and to have reproductive effects on laboratory animals. Like chlorinated naphthalene's, the chlorinated biphenyl's have two distinct actions on the body, namely, a skin effect and a toxic affect on the liver. The higher the chlorine content of the biphenyl compound, the more toxic it is liable to be. In persons who suffer systemic intoxication, the usual signs and symptoms are nausea, vomiting, loss of weight, jaundice, edema and abdominal pain. Research has also shown that occasional skin irritations, usually acne-like lesions and rashes, and liver effects are the only significant adverse health effects that have been observed in PCB-exposed workers. The following exposure levels are provided as a reference guide to assist in the selection of personal protective equipment during the site inspection, sampling, and decontamination procedures.

NIOSH REL:

TWA (Polychlorinated Biphenyl's)	0.001 mg/m^3 (1977)

National Academy of Sciences

Suggested no adverse response	350 mg/L (1977)

level

OSHA PEL

TWA (Aroclor 1254)	0.05 mg/m^3 (skin)

ACGIH

TLV-TWA (Aroclor 1254)	0.5 mg/m^3 (1986) (skin)

OSHA PEL

TWA (Aroclor 1242)	1 mg/m^3 (skin)

ACGIH

TLV-TWA (Aroclor 1242)	1 mg/m^3 (1986) (skin)

F-5e Fire and Explosion Data

PCB's are combustible when exposed to heat or flame. When heated to decomposition, they emit highly toxic fumes of Cl^-.

F-5f Emergency and First-Aid Procedures

Inhalation:	Remove individual to fresh air. If breathing is difficult, give oxygen. Give artificial respiration if breathing has stopped. Seek medical aid.
Skin Contact:	Wash thoroughly with soap and water. Seek medical attention if any irritation appears.
Eye Contact:	Immediately flush with large amounts of water for 15 minutes. Seek medical attention.
Ingestion:	Do not induce vomiting. Seek medical attention immediately.

F-5g Employee Protection

Eye Protection:	Industrial safety glasses minimum. As necessary to comply with 29 CFR 1910.33 and work area conditions: use side shields, goggles, or face shields.
Skin Protection:	As required, industrial resistant flexible-type gloves. Wear industrial-type clothing and safety footwear. Depending on the working conditions (i.e., contact potential), wear impervious protective garments such as head/neck cover, aprons, jackets, pants, coveralls, boots, etc.
Respiratory Protection:	If ventilation does not maintain inhalation exposures below TLV (PEL), use NIOSH/MSHA approved full face-piece air-purifying respirator with a combination high-efficiency particulate filter/ organic vapor cartridge per 29 CFR 1910.134 and follow manufacturer's "Instructions" and "Warnings."
Ventilation:	Provide sufficient general and/or local ventilation to maintain exposures below the PEL's or TLV's.
Work/Hygienic Practices:	Handle all materials with good industrial hygiene and safety practices. These practices include avoiding any unnecessary exposure and removal of the material from skin, eyes, and clothing. Safety showers and eye-wash stations should be available. If exterior protective clothing is not used, work clothes should be changed prior to leaving the closure site. Wash hands and face before eating, drinking, or smoking. Wash thoroughly before leaving the area.

F-5h Sampling Activities

During the pre-cleanup site inspection, a total of 85 potential samples will be taken. Twenty-four (24) of the screening samples will be taken of (dark, oily spots or discolorations if any are noted) or be "judgmental" samples. (Note: The 85 screening samples include 61 random samples which will only be used if the investigative team discover more than the 24 discretionary samples noted above.) The remaining samples will include randomly selected wipe sample points on the interior walls and floor

surfaces, scrape/destructive samples of the receiving unsealed concrete surfaces, and suspect and core samples. Since the southern sides of the facility are constructed of overhead doors that can be opened, the TLV's and PEL's in the ER Commercial PCB Storage Facility can be maintained well below the regulated levels. When taking the samples, however, the sampling technician will be wearing a hooded Tyvek suit and disposable boots, chemical-resistant gloves, a hard hat, and a full face-piece respirator. Prior to the actual sampling procedures, the respirator must be in place. The use of the respirator in this environment is more of a precaution against the vapors from the hexane used in the wipe sampling process than against the TLV or PEL for PCB's in this area. At each wipe sampling point, the sampling technician will place a 10cm-by-10cm template over the sample point and will remove from the sample storage bottle a 2-inch-by-2-inch gauze pad saturated with hexane and wipe across the entire 10cm-by-10cm area with moderate pressure. The outlined area should be wiped twice in opposite directions. The gauze pad is then returned to the sample storage bottle, the bottle is sealed, and all pertinent data is then recorded on the bottle; and the bottle is placed in a cool (4°C) storage container. The technician will enter the sample collection data in the field logbook and on the chain-of-custody form. Between each sampling point, the sample technician will change gloves and templates. All disposable items, such as the gloves, templates, and clothing, are placed in an approved DOT container, properly labeled, and shipped off-site for disposal at a PCB-permitted incinerator.

Scrape/destructive samples will use the following procedures. In this sampling process, the sampling technician need only have the face shield in place, since any PCB's in the unsealed concrete surfaces will have a low volatility. At each of the concrete sampling points, the technician will outline an area 10cm-by-10cm about the established sampling point. The concrete will be scraped or picked (for concrete chiseled) to a depth of about 1 cm using an appropriate stainless-steel tool. The concrete material will be placed in a precleaned bottle, the bottle will be capped and sealed, the label will be filled out, and the bottle will be placed in an ice chest to keep the sample at 4°C. The technician will enter the sample collection data in the field logbook and on the chain-of-custody form. Between each sampling point, the sample technician will change gloves and templates and decontaminate the stainless-steel trowel. No significant known hazards or risks are involved in either of these sampling procedures.

F-5i Personnel Decontamination Procedures

The southern 14-foot interior concrete apron near the southern manway to the ER Commercial PCB Storage Facility will serve as the "contamination reduction zone" and decontamination area for the ER Commercial PCB Storage Facility. Decontamination areas and contamination reduction zones for the exterior areas will be determined by on-site sampling personnel.

During closure activities, all persons entering ER Commercial PCB Storage Facility (the exclusion zone(s) during closure) or exterior sampling areas will be dressed in a

minimum of a hooded Tyvek suit, disposable boots, chemical-resistant gloves, safety glasses/goggles, and hard hat. A full face-piece respiratory system with organic vapor cartridges and particulate filters will be readily available. All donning and doffing of personal protective equipment while working in the ER Commercial PCB Storage Facility will occur in the southern 14-foot interior concrete apron near the southern manway. All donning and doffing of personal protective equipment while working in the exterior areas will take place in the designated decontamination/contamination reduction zones.

DOT-approved container(s) will be present in the decontamination areas for collecting those personal protective items that cannot be decontaminated properly. All discarded personal-protective-equipment items will be disposed of as PCB wastes. Prior to leaving the ER Commercial PCB Storage Facility site, personnel will thoroughly wash hands and face. The decontamination area may be used for break periods provided that no drinking, smoking, or eating takes place. Smoking, drinking, and eating are allowed only after personnel have been decontaminated and have left the decontamination area into the support zone (the vehicle maintenance area) or those areas established as the safe zones in the exterior sampling sites.

F-5j Environmental Quality Monitoring

The vehicle access doors on the east and south ends of the ER Commercial PCB Storage Facility can be opened to maintain inhalation exposure levels below the recommended TLV (PEL) levels. All personnel working in the closure-site area will be wearing outer protective clothing to minimize skin contact. With the adequate ventilation and protective body coverings, there is no need for a monitoring program.

F-5k Access Control

With all exterior doors secured, the only entrance to the ER Commercial PCB Storage Facility is through the main office area. Exterior doors will be unlocked only as needed to move equipment to the closure area and to provide emergency evacuation routes during working hours. Personal movement can be restricted so that entry into the closure-area decontamination room is through the hallway outside the southern manway entrance/exit to the ER Commercial PCB Storage Facility. As mentioned above, entrance into and exit from the ER Commercial PCB Storage Facility is only through the decontamination corridor along the southern concrete interior concrete apron to the PCB containment area. These safeguards are sufficient to be protective of the environment and health of the workers.

F-5l Sample Technician Training

All sampling personnel, as well as other personnel working on this closure site, will be required to have completed the following training:

1. Occupational Safety and Health Administration (OSHA) 40-hour Hazardous Waste Operations and Emergency Response Training (29 CFR 1910.120) with annual 8-hour updates.

2. OSHA Hazard Communication Program.

3. Standard first-aid course including cardiopulmonary resuscitation (CPR).

4. Evacuation procedures.

5. Chemical Spill Control procedure per the SPCC Plan.

6. Use of personal protective equipment (29 CFR 1910 Subpart I)

7. Respiratory training and fit test (29 CFR 1910.134)

In addition to this training, a PCB sampling technician should have a minimum of three months of on-the-job training with a seasoned sampling technician.

F-5m Weather-Related Precautions

The ER Commercial PCB Storage Facility is covered with a roof and is enclosed on all sides. Weather-related problems are not a concern for the covered portion of the facility. The prevailing winds in this area are predominantly from the northwest and west.

F-6 INITIAL INSPECTION OF THE FACILITY

F-6a Methodology

The initial inspection of the facility will be completed either by ER personnel or a third-party contractor. At the time of closure, the interior ER Commercial PCB Storage Facility will be free of all PCB wastes, and equipment. When dressed out in the protective clothing as described above, a team of at least two investigators, using a map of the facility, will inspect all areas of the ER Commercial PCB Storage Facility, including the Concrete Receiving Apron. Suspected areas of contamination will be documented photographically and by indicating the measured coordinates of areas of suspected contamination on the facility map. Measurements recorded on the facility map will be from fixed points so they can be located later if necessary. Photographs will be taken in such a manner that the background will provide the orientation of the photograph within the facility.

The investigators will concentrate their initial investigation of this storage area by looking for stains or discoloration that are suspect and would require direct discretionary sampling (nine discretionary samples are proposed for this area). If no visible signs of contamination are discovered, two randomly generated numbers (one for the length of the area and one for the width of the area) will be determined. The measurement point that is defined from these two numbers will serve as the sampling point. This process will be repeated to select seven additional sampling points within this area for the discretionary samples (see Sampling Plan). The investigators will mark these areas on their maps for the sampling technicians. Measurements added to the map from fixed objects will mark the point(s) for sampling and, if needed, for later decontamination. If the sampling technician is a part of this initial inspection, the samples can be taken during the site investigation. The team will search the entire PCB Storage Area, marking suspected areas on their maps using measurements from fixed objects to define the coordinates of the sampling location. Again, this information is useable by the sampling technician but is also necessary if the PCB wipe sample indicates that these areas require decontamination and the same spots are to be located again later.

Screening samples of the Exterior Access Approach Apron to the covered ER Commercial PCB Storage Facility will give a good indication of the integrity of this covered storage containment area. The first 6 feet of the concrete apron immediately in front of the east overhead access doors will be examined for stains or discolorations that are suspect and would require direct discretionary sampling. Any visibly contaminated or suspect areas on the concrete aprons will be noted on the facility map for scrape/destructive sample. Two discretionary samples will be collected from each of the access apron areas. If no visible signs of contamination are discovered, two randomly generated numbers (one for the length of the area and one for the width of the area) will be determined. The measurement point that is defined from these two numbers will serve as the sampling point. This process will be repeated to select the additional sampling points within the Concrete Access areas for the discretionary samples (see Sampling Plan). The investigators will mark these areas on their maps for the sampling technicians. Measurements added to the map from fixed objects will mark the point(s) for sampling and, if needed, for later decontamination. If the sampling technician is a part of this initial inspection, the samples can be taken during the site investigation. The team will search the concrete approach areas, marking suspected areas on their maps by using measurements from fixed objects to define the coordinates of the sampling location. Again, this information is useable by the sampling technician but is also necessary if the PCB wipe sample indicates that these areas require decontamination and the same spots are to be located again later. Four of the samples will be core samples for porous surfaces as described in 40 CFR Section 761.265.

The site inspectors will provide a written documentation of their findings, which will become a part of the closure records.

F-6c Summary - Initial Inspection of the Facility

The interior surfaces of the covered ER Commercial PCB Receiving and Storage Facility and the exterior Concrete Access Approach Apron will be thoroughly inspected for any signs of visible contamination. The suspected areas of contamination will be documented photographically and by indicating the measured coordinates of the suspected areas on the facility map. Measurements recorded on the facility map will be from fixed points, so suspected areas can be located later if necessary. Photographs will be taken in such a manner that the background will provide the orientation of the photograph within the facility. The site inspectors will provide a written documentation of their findings, which will become a part of the closure records.

Personnel conducting the initial site inspection and/or sampling will be dressed in accordance with the requirements established in the safety plan. The personal protective features of the safety plan stresses the "over-protection" of the individual with respect to the contamination and risks associated with the ER facility. No safety precautions other than those addressed in the safety plan are required for the closure inspection and sampling.

The initial samples taken in the Concrete Access Approach area will give a good indication of the integrity of the facility's containment structure. PCB's are rather ubiquitous in today's environment, having been carried by wind currents to nearly every corner of the earth. PCB levels in scrape/destructive samples below regulated levels are a good indicator of the integrity of the containment structure. During the initial site investigation, the inspectors will pay particular attention to any indicators of failure of the containment area. Such indicators might be separation of the floor surface due to uneven settling of the floor over time, stress fractures in the concrete surface, etc. Inspectors will determine at the time of the initial visit if any of these or other indicators of integrity failure exist and if such failed areas require sampling and the extent of that sampling.

F-7 SAMPLING PLAN/SAMPLING LOCATIONS

Following the initial site investigation, a screening-sample program of the areas designated PCB Storage Area, PCB Receiving Area, and Concrete Access Approach Areas will be completed. This sampling program will use two basic approaches -- the sampling of visibly contaminated or randomly selected judgmental/discretionary samples noted during the initial investigation and the selection of the remaining samples by the application of a statistical sampling grid to the floors, walls, and the concrete apron. A minimum of 85 screening samples will potentially be taken. The exterior samples will most likely be scrape/destructive samples and core samples. These screen sampling plans will allow for the assessment of the amount and distribution of PCB contamination within the active portions of the PCB Storage Areas. This approach is designed to provide the criteria for determining which areas of the facility are "clean" and which areas are above

regulated levels and require additional sampling, decontamination, and verification sampling.

F-7a Phase I

In the first phase of the screening sampling process, the sample technician(s) will collect the "judgmental/discretionary samples" as indicated by the site investigators as being areas of visible contamination or areas of suspected contamination. It is assumed that no more than 24 "judgmental samples" will be taken. The remaining 61 samples will be obtained through the application of a statistical sampling grid. (NOTE: In this screening sampling procedure, two [2] additional "suspect" wipe sample per area are included in the closure cost estimate for any additional "suspect" sampling points noted by the site investigation team.)

F-7b Phase II

In the second phase of sampling, the areas mentioned above will be sampled using a random sampling grid.

F-7b(i) PCB Storage Area

In addition to the nine discretionary samples taken within the PCB Storage Area, thirty-six random samples will also be taken from the floors. In the PCB Storage Area, the entire floor will make up a single sampling grid. The north/east wall of this area will be included with the sampling of the PCB Storage Area.

The floor of the PCB Storage Area will be viewed as being one contiguous area. The floor area will be viewed as being 30 feet wide and 45 feet long. The selection of the nine (9) sampling points for the floor surfaces will be determined at the site through the generation of two random values: one between zero and 34.5 feet, and one between zero and 37 feet. The intersection of these two values represents the sampling point within the grid. A single wipe sample will be collected at each sampling point. The technician will enter the sample collection data in the field logbook, on the sample bottle, and on the chain-of-custody form. All samples will be held in a 4°C ice chest.

	Discretionary Samples	Random Samples	"Suspect Samples"	Total Samples
Storage Area	9	34	2	45
Receiving Area	11	15	2	28
Concrete Approach Apron	4	6	2	12 (4 core)
Totals:	**24**	**55**	**6**	**85**

F-7c Evaluation and Reporting

This sampling scheme was devised since it will allow for the assessment of the amount and distribution of PCB's within the active portions of ER covered Commercial PCB Storage Facility. This approach is designed to provide the criteria for determining which areas of the facility are "clean" and which areas are above regulated levels and require additional sampling, decontamination, and verification sampling. The use of 85 samples was chosen because the number should be sufficient to evaluate the normality on a probability plot and to identify the deviations from normality. In addition, if the data are normal, the 85 samples will minimize the t-value used to calculate a confidence interval around the mean.

The data collected during this screening will be used to determine whether any of the surface areas in the ER covered Commercial PCB Storage Facility, the Concrete Access Approach Aprons are above the regulated levels and to characterize the distribution and concentration of the PCB's within these areas. The evaluation techniques will be consistent with accepted professional practices and will be carefully reviewed by ER contracted consulting firm's quality-assurance staff or by the third party's quality-assurance staff. A report will be generated from the investigation to document and evaluate the findings. Field records, including chain-of-custody forms and field-sampling logs, will be verified, reviewed, and maintained by ER and their contracted consulting firm. The same would be true for any third party closing this site.

Should any of the analyses of the wipe or scrape/destructive samples indicate an area that requires further investigation, statistical sampling grids, based on a sampling scheme adapted from the Midwest Research Institute's "Verification of PCB Spill Cleanup by Sampling and Analysis" and "Field Manual for Grid Sampling of PCB Spill Sites to Verify Cleanup" documents, will be developed for these areas. These grid sampling designs will be used to establish the concentration and extent of the contamination, so that the entire contaminated area surrounding the "hot spot" can be properly decontaminated to acceptable regulatory levels.

F-7d Sampling Methods

The interior surface areas to be sampled are: sealed walls, and floor and curb surfaces sealed with the non-porous epoxy polyurethane sealer. For the most part, the sealers provides an impervious bearer to spilled or released PCB's; therefore, wipe samples are recommended for these areas. The exterior surfaces, consisting of unsealed concrete, will be sampled by scrape (or destructive) sampling techniques.

F-7d(i) Wipe Samples

At each indicated interior location, the sample technician, dressed according to the safety plan, will take a wipe sample. The technician will have at his/her disposal all pre-

cleaned, properly prepared sample bottles, transportation-blank bottles, equipment-blank bottles, and replicate-sample bottles. The technician will also have a(n): adequate supply of chemical-resistant gloves, templates, trowels, field log book, calculator capable of generating random numbers within the limits established above, camera, and chain-of-custody forms.

At each of the wipe sample sites, the technician will hold the 10cm-by-10cm template over the point chosen by the randomly generated values. If no assistant is available, the technician may need to tape the template to the wall when sampling vertical surfaces. The technician will log into the field logbook the exact location of each sampling site as determined by the random values generated. A photograph of the site should also be taken as an additional documentation source. When the technician is ready to sample, he/she will carefully remove the 2-inch-by-2-inch gauze square saturated with hexane from the sample bottle, being careful not to contaminate the lid or bottle's integrity, and will wipe across the entire surface outlined by the template, first in a horizontal direction and then in a vertical direction with a moderate amount of pressure. The gauze is then returned immediately to the bottle, the bottle is sealed and appropriately labeled, and the bottle is placed in an ice chest to keep the sample at 4°C. Once the bottle is in the ice chest, the technician completes the chain-of-custody form and any additional notes in the field log book. Gloves and used templates are discarded into a plastic bag. New gloves and templates are used at each site to avoid cross-contamination. All disposable waste materials, such as the gloves and templates (etc.) used in this sampling process, will be handled as PCB-contaminated items and disposed of properly.

F-7d(ii) Scrape/Destructive Samples

At each of the scrape (destructive) sampling points, the technician will outline an area 10cm-by-10cm about the established sampling point. The concrete surface will be scraped or picked (concrete will be chiseled) to a depth of about 1 cm, using an appropriate stainless-steel tool. The concrete material will be placed in a pre-cleaned bottle, the bottle will be capped and sealed, the label will be filled out, and the bottle will be placed in an ice chest to keep the sample at 4°C. The technician will enter the sample collection data in the field logbook and on the chain-of-custody form. The technician will clean the sampling equipment and change gloves in between sample points.

F-8 QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC)

F-8a Quality Assurance Objectives

The overall objectives for the Quality-Assurance Procedures are as follows:

- Ensure the quality data generated by the study meets the goals of the investigation.

- Maintain the value of any data produced in this study as evidence in any legal action or suit.

- Ensure the validity and integrity of the data/results of the site investigations, laboratory analyses, and technical reports.

- Ensure that site management assessments, actions, and designs are properly prepared and approved.

- Guide the quality of the specified work performed by all personnel involved in the study.

F-8b Field Procedures

F-8b(i) Random Samples of Containment Areas

Random sample locations will be chosen so that all of the containment surfaces have an equal chance of being selected.

To choose the sampling locations, the width and length of the wall and containment floor area will be measured in feet. Two random numbers, which are between zero and the length and zero and the width and which represent the distance along the length and width of the wall or containment-floor areas, will be generated. A sample will be collected at this location.

F-8b(ii) Sample Container Preparation

A certified testing laboratory will provide all sample containers. The containers will be prepared according to all applicable container preparation methods and quality-assurance procedures.

F-8b(iii) Decontamination Procedures

All tools that come into contact with potentially contaminated material will be decontaminated after each use. The procedure that will be followed includes, but is not limited to:

- Tools will first be rinsed in a PCB-compatible solvent and then washed in an Alconox soapy-water solution made from clean water. A brush may be used to facilitate the process.

- The tools will be rinsed in a clean water rinse.

- The tools will be rinsed in a second clean water rinse.

- Rinse and wash waters will be changed frequently.

- The tools will be allowed to air dry before use.

- The tools may be wrapped in foil to prevent re-contamination during storage or transportation.

All wash and rinse waters and any equipment that cannot be decontaminated will be placed in DOT-approved 55-gallon drums, labeled, and manifested off-site to a licensed PCB facility.

F-8b(iv) Analytical Laboratory QA/QC

All analyses will be performed by a certified laboratory.

F-8b(v) Chemical Analysis Performance Audits

The laboratory manager, in cooperation with the laboratory area supervisors and QA supervisor, performs individual audits on all aspects of the operation as required. These audits include an evaluation of performance data, control limits, records, and laboratory performance on all check samples and blind QC samples. A report of the audit results, including recommendations, is forwarded to the director of analytical services, if requested.

F-8b(vi) Chemical Analyses Data Validation

The data-validation process should include a set of computerized and manual checks at various appropriate levels of the measurement process.

The data-validation process starts with the laboratory analyst. The analyst verifies in his/her laboratory notebook that all methods-specific operational parameters are utilized and/or met. This information is to be specifically documented in all instrument logbooks. The analyst then verifies that the calibration of the equipment is linear and documents this in the instrument logbooks. If the operating parameters of a particular method are modified, it will be written in the analyst's lab notebook. A non-calibrated system will be identified by the analyst and calibrated prior to sample analysis.

The generation of sample data by an analyst includes the generation of quality-control data for each sample set. The monitoring of method blanks, sample spikes, method spikes and sample-duplicate analysis is accomplished by adherence to precision and by the accuracy of data for each method. The analyst computes the data precision and accuracy and compares the computed value to the acceptance intervals identified for the method. The computed value will be determined in control if it lies within the acceptance interval. If the computed value is deemed out of control, the data set is not submitted for supervisor approval; but it is to be brought immediately to the attention of the supervisor and quality-assurance supervisor, via a corrective-actions form, that an out-of-control condition exits. Jointly, a review is conducted to determine the cause(s) and to conduct

corrective action. The data set is rerun once the corrective actions have taken place, and the new data reviewed as stated above.

F-8b(vii) Accuracy, Precision and Sensitivity of Chemical Analyses

The fundamental QA objective regarding the accuracy, precision, and sensitivity of laboratory analytical data is to achieve the QC acceptance criteria of the analytical protocols. These QC control limits should be completely met without outliers.

Typically, if an out-of-control result occurs, the analyst will identify it as such and report the occurrence to the Group Leader and/or Area Supervisor. This person will review the corrective actions form with the analyst to identify the problem and discuss the corrective actions(s) taken. The corrective action(s) will be identified in the analysis notebook and in writing to the QA Supervisor. The QA Supervisor will review the corrective action by the new in-control data point for the same data set.

F-8b(viii) Transportation Blanks

Transportation blanks or trip blanks are used to evaluate the possibility of contamination of a sample from environmental factors associated with sample transportation, containers, or preservatives. These blanks will be handled and transported in the same manner as containers used for field samples. Transportation blanks will be collected for each sampling trip. The blanks for the samples will be composed of commercially available sand material that will have been previously analyzed for the soil sample parameters.

F-8b(ix) Equipment/Field Blanks

Field blanks are used by project personnel to evaluate the effectiveness of equipment-cleaning operations or to evaluate sample contamination from environmental factors other than the source being investigated. Examples of field blanks are:

- After the sample collection device has been used and cleaned, a volume of demineralized and organic-free water is placed in the device (or pumped through it) and a field blank collected. A rinse sample will be collected during the investigation if the same trowel is used each time.

- A field blank can be prepared by filling a sample bottle with demineralized water while in the field. Normally, this procedure is used if air contaminants at the site are suspected.

The number of blanks will be dependent upon the site field operations. At a minimum, blanks will be collected from the sampling device.

F-8b(x) Replicate Samples

Replicate samples or duplicates are collected from one sampling point at the same time the original sample is collected. Approximately one to ten samples will be duplicate samples. Duplicate samples will be taken of all the sample types. Duplicate samples are used to determine the precision of the sampling procedures.

F-8b(xi) Chain-of-Custody (Field)

To document sample possession from the time of collection until the sample has been received by the analytical laboratory sample custodian/coordinator, a chain-of-custody form will be completed by field personnel and will accompany every sample shipment. Proper custody of the samples will be documented, and changes in sample custody will be documented. As few people as possible will handle the samples. While in the field, it is the field technician's personal responsibility for the care and custody of the samples until they are transferred or properly dispatched. This chain-of-custody procedure will be followed during all sampling assignments, regardless of the ultimate use of the sample data for this project.

Each record will contain the following information: signature of collector, date and time of collection, place of collection, sample type, signatures of persons involved in the chain of possession, and inclusive dates and times of possession. The field log(s) and final evidence file are also part of the overall chain-of-custody requirements of this project.

F-8b(xii) Documentation/Records

The field technician will properly identify the exact location of the sample taken; the date upon which it was obtained; the type of sample; whether or not preservative has been used and, if so, what type; the name of the sampler; the client's name; and the respective project number. This information is to be documented in the field sampling log of the individual and/or the site log book. This same information is then placed on the sample identification tag, which in turn is affixed to the sample container. All sample tags will be filled out with indelible ink to prevent illegible sample information. If the field sampler determines that additional information is pertinent to the sample being taken, such data can be recorded in the logbook.

F-8b(xiii) Chain-of-Custody (Laboratory)

All samples for this project will be under strict chain-of-custody procedures. This means that all samples must be traceable from the time the samples are received at the certified analytical laboratory until the results are reported and sample disposition has been determined.

All samples will be received at the certified analytical laboratory by the sample custodian/coordinator. It will be the responsibility of the sample custodian/coordinator to determine: 1) which analyses are to be performed on the arriving samples; 2) whether or

not the samples are labile in nature and require immediate attention; and 3) the manner in which those samples will be split, preserved, and stored or routed. It is the objective of the sample custodian/coordinator to ensure that the receipt of all samples is consistent with the requirements and that all pertinent information relative to those samples is recorded.

F-8b(xiv) Examination of Container Contents

It is the sample custodian/coordinator's responsibility to examine whether or not each of the sample containers is individually sealed, whether those seals are intact, whether a sampler's initials are on the seals, and whether or not the paperwork matches the contents of the package. In addition, the sample custodian/coordinator will note whether or not all the dates and times are consistent and whether or not the sample description on the paperwork matches the description on the sample container.

F-8b(xv) Chain-of-Custody Log-In

All samples received at the certified analytical laboratory must be logged in before work is performed on the samples. The purpose of the log-in procedure, including sequential numbers assigned to all samples received in the facility, is to ensure that the analytical laboratory has a means by which samples can be tracked, data can be stored, and quality control can be tracked for any sequence of events during a particular analytical period. In handling projects in this manner, the analytical laboratory and ER can ensure a consistent and documented sequence of events under any analytical situation.

After the sample custodian/coordinator has inspected the shipping containers, the project sheets, the samples and any documentation required, the sample custodian/coordinator will ensure that all pertinent information is entered on the project sheet. There are specific areas of the project sheet that are to be completed by the sample custodian/coordinator (i.e., date and time received).

Minimum information required for log-in includes:

- ER name, contact person, and project number
- due date
- analytical test or test codes, or group tests
- specific project comments
- contract requirements
- contract number

- pricing, if necessary
- chain-of-custody requirements
- specific report requirements.

The sample custodian/coordinator will complete a chain-of-custody project log-in form.

All samples received for the ER project will be kept in a locked storage area and will be distributed for analysis to the laboratory only when the analyst has signed for the samples on the attached internal custody form. The sample custodian/coordinator or a designated representative will provide access to the chain-of-custody storage. Records of movement of all chain-of-custody samples within the lab facility will be recorded.

F-8b(xvi) Chain-of-Custody Project Files

All analytical project files will be kept in a project folder in a locked cabinet with all related documents and paperwork relative to those files.

F-8b(xvii) Maintenance of Laboratory Custody

Laboratory custody must be consistent with all the chain-of-custody requirements from the beginning of sampling to the final report. To this end, every analyst requiring access to the samples will go to the sample custodian/coordinator for access to the chain-of-custody locked sample storage. The sample custodian/coordinator will ensure that the analyst signs for the receipt of all chain-of-custody samples on the attached chain-of-custody log-in form and that the analyst returns and signs in those same samples on the same day for which they were signed out. This documentation, after the completion of all analyses, will be placed in the project file by the sample custodian/coordinator.

F-8b(xviii) Laboratory Custodial Responsibilities

It will be the responsibility of every analyst signing for a sample or samples to ensure that: a) these samples are kept in a minimum-access facility, b) they are within their possession during the particular period during which they are being analyzed, and c) the analyst returns those samples to the chain-of-custody lockup in the manner prescribed. The analyst will sign out and return the samples to chain-of-custody lock-up on the same day. The analyst will be using the sample coordinator as the sample custodian/coordinator for all chain-of-custody samples.

F-8b(xix) Chain-of-Custody Sample Disposal

All samples received for the project will be stored in the certified analytical laboratory chain-of-custody lock-up facilities until a final report is issued. No chain-of-custody

samples may be discarded until written permission is received relative to disposal of those samples.

F-8b(xx) Laboratory Analyses

The laboratory will conduct all analyses in accordance with U.S. EPA's SW-846 "Test Methods for Evaluating Solid Waste" 3rd Ed. Nov. 1986. These procedures incorporate stringent quality-control requirements and describe precision, accuracy, calibration criteria, internal standards, and method-detection limits.

The following methods as listed in SW-846 will be used to test for PCB's:

Scrape/Destructive

Parameter	SW-846 Method
PCB's Aroclors 1016,1221 1232, 1242, 1248 1254 and 1260	8080

Wipe Samples

Parameter	SW-846 Method
PCB's Aroclors 1016, 1221 1232, 1242, 1248 1254 and 1260	8080

F-9 DECONTAMINATION PROCEDURES

Decontamination procedures for PCB's will only be implemented at the ER facility if the statistically valid screening samples uncover that there are individual sites of contamination or if the screening samples indicate that the entire facility has levels of PCB contamination above the regulated levels. If all the screening samples prove to be below the regulated levels, the site is "clean" and decontamination will not be needed. In this instance it would be up to the owner or operator of ER to decide if they want to clean the facility further.

If, on the other hand, the screening samples indicate areas that are above the regulated levels, those areas will be decontaminated. To determine the extent of the contamination, ER or the third-party consulting firm will establish a sampling grid about the "hot spot" and perform additional sampling to determine the extent of the contamination.

Once the areas of contamination have been resampled and the extent of the contamination has been mapped out, the areas will be decontaminated. Workers performing the decontamination process will be dressed and protected in accordance with the safety plan. At a minimum, workers will be dressed in hooded Tyvek suits, with protective boots, chemical-resistant gloves, safety goggles, hard hat with a face shield and a half-face respirator (or a full face-piece respirator with organic-vapor cartridges with dust filters may be used in place of the half-face respirator, goggles, and face shield). The worker must have completed the OSHA 40-hour Hazardous Waste Operations and Emergency

Response training with the annual 8-hour update training, OSHA Hazard Communication program, and Standard First-Aid Course with CPR. The workers must be covered by a medical surveillance company program which includes annual reviews.

As mentioned previously, the ER facility is designed with south overhead doors that when opened will provide sufficient natural ventilation to keep the exposure to PCB's well below the exposure limits. The protection of the workers as described above will decrease their exposure to dust and mist that will be produced during the decontamination process. In the decontamination process, solvents with a high solubility for PCB's will be used and applied by high-pressure sprayers. Heavily stained areas will be brushed as needed. The washing will be followed by a rinse with a water-based solvent that is compatible with the initial wash solvent. The sprayed solvents and rinses will be vacuumed up. Care will be taken to prevent the release of any cleaning materials and residues into the environment. Following the initial cleaning, the contaminated areas will be high-pressure washed again with PCB-compatible solvents and will be rinsed and then all wash solvents will be recovered by vacuuming.

All wash solvents will be treated as PCB wastes and will be shipped off-site for disposal by incineration. It is estimated that 50 gallons of liquid or less will be generated during the cleaning process. This estimate is assuming the entire ER Commercial PCB Storage Area is totally decontaminated.

If the concrete samples indicate that PCB's above regulated levels are found in the concrete areas, those concrete areas adjacent to the Concrete Access Aprons will be grid sampled and scrape/destructive samples for the indicated area or areas will be established in order to discover the extent and depth of the contamination. Following these additional samplings, the amount and depth of penetration of the PCB's will be established. The defined contaminated area or concrete area plus 4 inches of soil beneath the contaminated area will be removed. Following verification sampling, which indicates that all regulated levels of contamination have been removed, the site will be backfilled with soils containing less than 1 ppm PCB's.

All equipment used to handle PCB's at the ER Commercial PCB Storage Facility will be disposed of as PCB waste at a licensed PCB landfill and moved out of the ER Commercial PCB Storage Area prior to the screening sampling procedures. The equipment will include one (1) drum cart, one (1) drum lifter, one (1) pallet, one (1) portable scale lifting slings two (2) to lift PCB transformers or electrical equipment and place on pallets for storage. Wipe samples with PCB levels below 10 ug/100 cm^2 will be used to certify that the equipment that has been decontaminated and removed from the Commercial PCB Storage Facility was "clean." These analytical results will become a part of the closure documentation.

All third-party contractor equipment used in this decontamination process shall be PCB-dedicated equipment. All equipment used in the decontamination process will be cleaned

in accordance with the requirements established in 40 CFR 761.79 (b) using the same PCB-compatible solvents prior to their removal from this site. All liquids generated during this decontamination of the equipment will be collected, placed in 55-gallon drums , and shipped off-site to a licensed PCB facility. Any equipment such as brooms, squeegees, absorbent pads, Tyvek suits, rubber gloves, and overboots (etc.) that cannot be effectively decontaminated will be drummed in appropriate DOT containers, labeled, and disposed of as solid PCB wastes.

F-10 VERIFICATION SAMPLING

Following the decontamination of the indicated area(s), verification sampling will take place. If the entire area has to be decontaminated, then a sampling program using 85 samples and verification sampling grids will be used.

If, on the other hand, only individual sites needed decontamination, then new sampling grids rotated 90 degrees to the pre-decontamination sampling grids will be developed and verification samples taken.

In either case, the results of these verifications will determine if additional decontamination is needed or if the site is "clean."

The analytical methods to be used in the verification sampling are the same as those specified above under "Laboratory Analyses."

All contaminated soils, wash solvents, rags, disposable clothing, and any other materials, which cannot themselves be decontaminated and result from the decontamination procedures, will be properly stored, labeled, and disposed of in accordance with the provisions of 40 CFR 761.60. ER' preference is that all such liquid wastes be shipped off-site for incineration. The solid wastes will be sent off-site for land disposal. An estimate of the maximum amount of liquids that might be generated from a one-time decontamination procedure as described above is 50 gallons. The number of 55-gallon drums holding disposable items is estimated to be "one."

It is difficult to see into the future; but at the present time, the following transportation and disposal facilities are available to remove and dispose of PCB waste materials:

~~Chemical Waste Management — Landfill~~
~~Emelle Facility~~
~~Alabama Hwy. 17 at Mile Marker 162~~
~~Emelle, Alabama 35459~~

Chemical Waste Management — Landfill
1550 Balmer Road
Model City, New York 14107

~~USPCI~~ ~~Landfill~~
~~Grassey Mountain Facility~~
~~3 Miles East, 7 Miles North of~~
~~Knolls, Utah (Exit 41 on I-80)~~

~~U.S. Ecology~~ ~~Landfill~~
~~P.O. Box 578~~
~~Beatty, Nevada 89003~~

~~APTUS~~
Clean Harbors Incinerator
Highway 169 North
P.O. Box 1328
Coffeyville, Kansas 67337

~~Rollins Environmental~~ Incinerator &
Clean Harbors
P.O. Box 609 Cleanup Contractor
Deer Park, Texas 77536

TCI, Inc. Reclamation
101 Parkway East
Pell City, AL 35125

Clean Harbors **Reclamation**
1672 Highland Road
Twinsburg, OH 44087-2219

Clean Harbors **Incineration/**
1302 West 38th Street **Dechlorination**
Ashtabula, OH 44004-5434

Wayne Disposal (EQ) **Landfill**
49350 N Interstate 94 Service
Belleville, MI 48111-1854

Veolia **Incineration**
5959 Memorial Blvd
Port Arthur, TX 77640

Lighting Resources **Reclamation**
498 Park 800 Drive
Greenwood, IN 46143

Lighting Resources
1522 East Victory Street
Phoenix, AZ 85040

Reclamation

F-11 OTHER CLOSURE ACTIVITIES

All liquid PCB wastes stored at the ER Commercial PCB Storage Facility are stored within the confines of the specially designed, completely enclosed containment areas. All loading and unloading activities involving these liquid wastes are carried out within the confines of the containment structures. Any leaks are quickly cleaned up and the area decontaminated by attending personnel. Weekly inspections assure that the integrity of the facility is not breached. The internal containment area is always kept in a very clean and dry state. Periodic sampling of the facility floors have revealed levels of PCB below the regulatory standard of 10 ug/100 cm2 (see Appendix B.II)

Based on these standard operating practices, ER does not expect to find PCB above regulated levels in the exterior environment above natural background levels. Therefore, groundwater monitoring will not be required.

F-12 SCHEDULE FOR CLOSURE

ER does not have a definite final closure date, but the date of final closure of the ER Commercial PCB Storage Facility is estimated to be the year 2020. ER will notify the Regional Administrator or Director at least 60 days prior to the date on which final closure of its PCB-storage facility is expected to begin. No PCB wastes will be received by ER 30 days prior to this estimated final closure date. Within 90 days of having received the final quantity of PCB's, ER will have removed all PCB wastes from this facility. Final closure of this facility will be within 180 days of having received the final quantity of PCB wastes. Within 60 days of completion of closure of the ER Commercial PCB Storage Facility, ER will submit to the Regional Administrator or Director, by registered mail, a certification signed by the owner and by an independent registered professional engineer that states that the ER Commercial PCB Storage Facility has been closed in accordance with the approved closure plan. Appendix E.I outlines the task to be accomplished for closure and provides an approximate schedule of final closure activities.

F-13 MODIFICATION TO CLOSURE PLANS

In accordance with 40 CFR 761.65 (e)(4), ER will submit to the Regional Administrator or Director a written request whenever there is a need for a modification to its storage approval to amend its closure plan. A request will be submitted whenever:

1. There is a change in ownership, operating plans, or facility design, which affects the existing closure plan.

2. There is a change in the expected date of closure, if applicable.

3. In conducting closure activities, unexpected events require a modification of the approved closure plan.

4. Financial status changes, which may result in an inability to adequately pay for closure.

F-14 CLEAN CLOSURE CERTIFICATION

Within 60 days of completing final closure, a clean closure certification will be submitted to the Regional Administrator or Director of Region V by certified mail. This certification will state that the ER Commercial PCB Storage Facility has been closed in accordance with this approved closure plan. The certification will be signed by the owner/operator and by an independent registered professional engineer.

SECTION G
RECORDKEEPING, MANIFESTS, RECORDS, AND REPORTS

The information in this section is submitted in accordance with the requirements of 40 CFR 761.65(c)(9); 40 CFR 761.180 (b); 40 CFR 761.202, 205, 207, 208, 209, 210, 211, 215, and 218.

TABLE OF CONTENTS

APPENDICES

G-1 EPA IDENTIFICATION NUMBER

In accordance with the regulatory requirements as outlined in 40 CFR 761.202 and 40 CFR 761.205, Environmental Recycling has an EPA I.D.# OHR000034025 and has notified in this application as a generator, transporter, and storer of PCB wastes with the:

Chief, Chemical Regulation Branch (TS-789)
Office of Toxic Substance
Environmental Protection Agency
Room NE-17
401 M Street, SW
Washington, DC 20460

A copy of the original notification is located in Appendix G.I. ER is aware that under these regulations that PCB wastes cannot be processed, stored, transported, or offered for transport if a generating facility has not received an EPA identification number. Likewise, as a transporter, ER is aware that a transporter cannot transport nor deliver PCB wastes to another transporter, commercial storer, or disposer unless the next transporter and the next receiving facility also have an EPA identification number. As a commercial storer of PCB wastes, ER is also aware that it cannot receive for storage PCB wastes without having the proper EPA identification number.

G-2 THE MANIFEST

As a generator, transporter, and storer of PCB waste materials, ER is well aware of the manifesting requirements outlined in 40 CFR 761.207.

G-2a) ER as a Generator

When a shipment of PCB waste materials is initiated from the ER Commercial PCB Storage Facility, a complete manifest and accompanying documentation (if applicable) are prepared. Manifest selection shall be in accordance with the requirements specified in 40 CFR 761.207(c), (d), (e), and (f).

~~If the State to which the shipment is manifested (i.e., consignment State) supplies the manifest and requires its use, the ER will use that manifest.~~

~~If the consignment State does not supply the manifest, but the State in which the generator is located (i.e., generator State) supplies the manifest and requires its use, then ER will use that State's manifest.~~

~~If both the consignment State and the generator State supply manifests and require their use, ER will use the consignment State's manifest.~~

~~If neither the generator State nor the consignment State supplies the manifest, ER will obtain the manifest from a commercially available source.~~

The manifest must contain, at a minimum, the following:

For each bulk load of PCB's - the identity of the PCB waste, the earliest date of removal from service for disposal, and the weight in kilograms of the PCB waste.

For each PCB Article Container or PCB Container - the unique identifying number, type of PCB waste (e.g., soil, debris, small capacitor), earliest date of removal from service for disposal, and weight in kilograms of the PCB contained.

For each PCB Article not in a PCB Container or PCB Article Container - the serial number if available, or other identification if there is no serial number, the date of removal from service for disposal, and weight in kilograms of the PCB waste in each PCB Article.

The generator's name, address, EPA ID number, and phone number

Each transporter's name, EPA ID number, and phone number

The destination of the PCB waste shipment, including address and EPA ID number

An alternative PCB management facility, address, and EPA ID number (optional)

The Department of Transportation's proper shipping name, hazard class, and I.D. number

The quantity or volume of the waste in the shipment

The number or type of containers in the shipment

A signed, dated certification of the shipment's contents

The 24-hour telephone number of the person with detailed information of the PCB waste characteristics of the material being shipped

The proper use of technical names with any shipment using the n.o.s. shipping description

ER's representative will sign and date the Generator's Certification section of the manifest and obtain the handwritten signature of the transporter and the acceptance date. ER's representative will retain the specified copies from the manifest and give the transporter the remaining copies. (For the Michigan manifest, the generator retains the ~~first [State copy] and the Generator First Copy~~ **Generator initial copy**. The generator mails ~~the State~~ **a** copy of the manifest to the ~~MDNR~~ **MDNRE** no later than the 10th day of the month following the shipment.) ER will keep the generator copy of the manifest with its records according to 40 CFR 761.209(a).

If ER employs an independent transporter to transport its PCB waste to another commercial storer or disposal facility, ER will confirm by telephone, or by other means that the commercial storer or disposal facility actually received the manifested waste. ER is to confirm receipt of the waste by close of the business the day after ER receives the signed and dated manifest from the commercial storer or disposer.

If ER does not receive a copy of the manifest ~~(Generator Second Copy)~~ with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter, then ER will contact the transporter and/or the owner or operator of the designated facility to determine the status of the waste. If ER does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter, ER will submit an Exception Report to the Environmental Protection Agency Regional Administrator for Region V.

ER will maintain and retain a written record of all telephone or other confirmations to be include in its annual document log, in accordance with 40 CFR 761.208.

G-2b) ER As a Transporter

As a transporter of PCB wastes, ER will comply with the following requirements:

- only accept properly manifested regulated PCB wastes
- have the generator sign and date the manifest
- sign and date the manifest in the transporter acceptance block
- return the proper copy or copies of the manifest to the generator
- retain the manifest with the shipment
- obtain the date of delivery and signature of any subsequent transporter or of the designated commercial storer or disposer
- retain one copy of the signed and dated manifest in accordance with 40 CFR 761.209(b)
- give the remaining manifest copies to the accepting transporter of the PCB waste, or to the designated commercial storer or the disposal facility
- Rejected loads will be handled in accordance with the EPA rejected load procedures as found in Appendix A.II.

G-2c) ER as a Commercial Storer

As a commercial storer of PCB wastes, ER will comply with the following manifest requirements when it accepts PCB wastes:

- sign and date the remaining manifest copies to certify that the PCB's covered by the manifest have been received
- note any significant discrepancies in the manifest
- give the transporter a signed copy of the manifest
- within 30-days after the delivery, send a copy of the manifest to the generator
- retain a copy of the manifest among the facility records in accordance with 40 CFR 761.209(d)
- All manifests will be retained at the ER facility until 3 years after closure as required by 40 CFR 761.180

G-2d) Manifest Discrepancies

ER will note and attempt to reconcile any manifest discrepancies. For those discrepancies not resolved within 15 days after receiving the PCB waste, ER will immediately submit to the Region V Administrator a letter describing the discrepancy and the attempts to reconcile it and a copy of the manifest.

Manifest discrepancies are defined as the different between the quantity or type of PCB waste designated on the manifest and the quantity or type of PCB waste actually delivered to and received by a designated facility.

G-2e) Unmanifested Waste Report

All wastes received at the ER Commercial PCB Storage Facility are assumed to be PCB wastes and therefore must be manifested. However, should it ever occur that an unmanifested shipment be received at the ER Commercial PCB Storage Facility, ER will comply with the requirements for the Unmanifested Waste Report as outlined in 40 CFR 761.211.

G-2f) Exception Reporting

As indicated above, ER will comply with the Exception Report requirements for any unresolved manifest problems regarding wastes shipped to another commercial storer or disposer and a signed copy of the manifest was not returned. ER will also comply with the One-Year Exception Report when ER has transferred a PCB waste to a disposer within 9 months from the date of removal from service and ER has not received within 13 months from the date of removal from service for disposal a Certificate of Disposal or ER receives a Certificate of Disposal more than one year after the date of removal from service.

ER will maintain copies of Certificates of Disposal with the other records retained in accordance with 40 CFR 761.180(b).

APPENDIX G.I

USEPA United States Environmental Protection Agency Washington, DC 20460

Form Approved OMB No. 2070-0159

Notification of PCB Activity

Return To:

Fibers & Organics Branch (7404)
Office of Pollution Prevention & Toxics
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

For Official Use Only

1. Name of Facility	Name of Owner Facility	2. EPA Identification Number (if already assigned under RCRA)
Environmental Recycling	Penn Group, LLC	OHR 000 034 025

3. Facility Mailing Address (Street or PO Box, City, State, & Zip Code)	4. Location of Facility (No. Street, City, State, & Zip Code)
527 E. Woodland Circle PO Box 167 Bowling Green, OH 43402	

5. Installation Contact (Name and Title)

Michael Dolkowski, President

Telephone Number (Area Code and Number)

419-354-6110 or 800-284-9107

6. Type of PCB Activity (Mark 'X' in appropriate box. See Instructions.)

- [X] A. Generator w/onsite storage facility
- [X] B. Storer (Commercial)
- [X] C. Transporter
- [ ] D. R&D/Treatability
- [ ] E. Approved Disposer
- [ ] F. Scrap Metal Recovery Oven/Smelter, High Efficiency Boilers

7. Certification

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (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 and accuracy, I certify as a 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.

Signature	Name and Official Title (Type of Print)	Date Signed
	Michael Dolkowski President	4/26/99

Paperwork Reduction Act Notice

The annual public burden for this collection of information is estimated to average 1.5 hours per response. This estimate includes time for reading instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing collection of information, including suggestions for reducing the burden to: Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (mail code 2137), 401 M Street, S.W., Washington, D.C. 20460. Include the OMB number identified above in any correspondence. Do not send the completed form to this address. The actual information or form should be submitted in accordance with the instructions accompanying the form, or as specified in the corresponding regulations.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

Michael Dolkowski
Pemm Group, LLC
527 E. Woodland Circle
P.O. Box 167
Bowling Green, OH 43402-

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

August 11, 2003

This is to notify you that the Environmental Protection Agency has received your request to either modify the entry or remove the facility from the PCB Activity Database System (PADS). EPA has taken the following action (as indicated by an "X") to respond to your request:

X The modification you requested has been made; this is your confirmation. (Reference # 6358)

_ A code has been inserted in the database to indicate that your company notified and subsequently requested withdrawal of the notification. This letter serves as your confirmation. (Reference # _____)

_ Other (explanation provided).

If you have any questions regarding the PCB Activity Database System, please contact Robert Courtnage at (202) 566-1081.

Sincerely,

Tony Baney, Chief
Fibers & Organics Branch

Environmental Recycling

facsimile transmittal

To:	To whom it may concern	Fax:	202-566-0473
From:	Mike Dolkowski	Date:	5/27/2003
Re:		Pages:	2
CC:			

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

For your records please find a copy of our notification of PCB activity changes, Region V has asked that we notify as a disposer for decontamination of equipment following the decontamination procedures in 49 cfrpart 761 . Original is in the mail

Mike Dolkowski

USEPA United States Environmental Protection Agency Washington, DC 20460 | Form Approved OMB No. 2070-0112

Notification of PCB Activity

Return To:

Fibers & Organics Branch (7404)
Office of Pollution Prevention & Toxics
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

For Official Use Only

1. Name of Facility	Name of Owner Facility	2. EPA Identification Number (if already assigned under RCRA)
ENVIRONMENTAL RECYCLING	PEMM GROUP, LLC	OHR 000 034 025

3. Facility Mailing Address (Street or PO Box, City, State, & Zip Code)	4. Location of Facility (No. Street, City, State, & Zip Code)
527 EAST WOODLAND CIRCLE P.O. BOX 167 BOWLING GREEN, OHIO 43402	

5. Installation Contact (Name and Title)
MICHAEL DOLKOWSKI
PRESIDENT

Telephone Number (Area Code and Number)

6. Type of PCB Activity (Mark 'X' in appropriate box. See Instructions.

- [X] A. Generator w/onsite storage facility
- [X] B. Storer (Commercial)
- [X] C. Transporter
- [ ] D. R&D/Treatability
- [X] E. Approved Disposer
- [ ] F. Scrap Metal Recovery Oven/Smelter, High Efficiency Boilers

7. Certification

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (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 and accuracy, I certify as a 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.

Signature	Name and Official Title (Type of Print)	Date Signed
	MICHAEL DOLKOWSKI PRESIDENT	5/27/03

Paperwork Reduction Act Notice

The annual public burden for this collection of information is estimated to average 1.5 hours per response. This estimate includes time for reading instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing collection of information, including suggestions for reducing the burden to: Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (mail code 2137), 401 M Street, S.W., Washington, D.C. 20460. Include the OMB number identified above in any correspondence. Do not send the completed form to this address. The actual information or form should be submitted in accordance with the instructions accompanying the form, or as specified in the corresponding regulations.

EPA Form 7710-53 (Rev.)
Previous editions are obsolete.

USEPA	United States **Environmental Protection Agency** Washington, DC 20460	Form Approved OMB No. 2070-0112

Notification of PCB Activity

Return To:
Document Control Officer (5305P)
Office of Solid Waste
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, DC 20460-0001

For Official Use Only

1. Name of Facility	Name of Owner Facility	2. EPA Identification Number (if already assigned under RCRA)
Environmental Recycling	Pemm Group, LLC	OHR000034025

3. Facility Mailing Address (Street or PO Box, City, State, & Zip Code)
527 E. Woodland Circle
PO Box 167
Bowling Green, OH 43402

4. Location of Facility (No. Street, City, State, & Zip Code)

5. Installation Contact (Name and Title)
Todd Hendrick, EHS Manager

Telephone Number (Area Code and Number)
419-354-6110

6. Type of PCB Activity (Mark 'X' in appropriate box. See Instructions.)

- [X] A. Generator w/onsite storage facility
- [X] B. Storer (Commercial)
- [X] C. Transporter
- [ ] D. R&D/Treatability
- [X] E. Approved Disposer
- [ ] F. Scrap Metal Recovery Oven/Smelter, High Efficiency Boilers

7. Certification

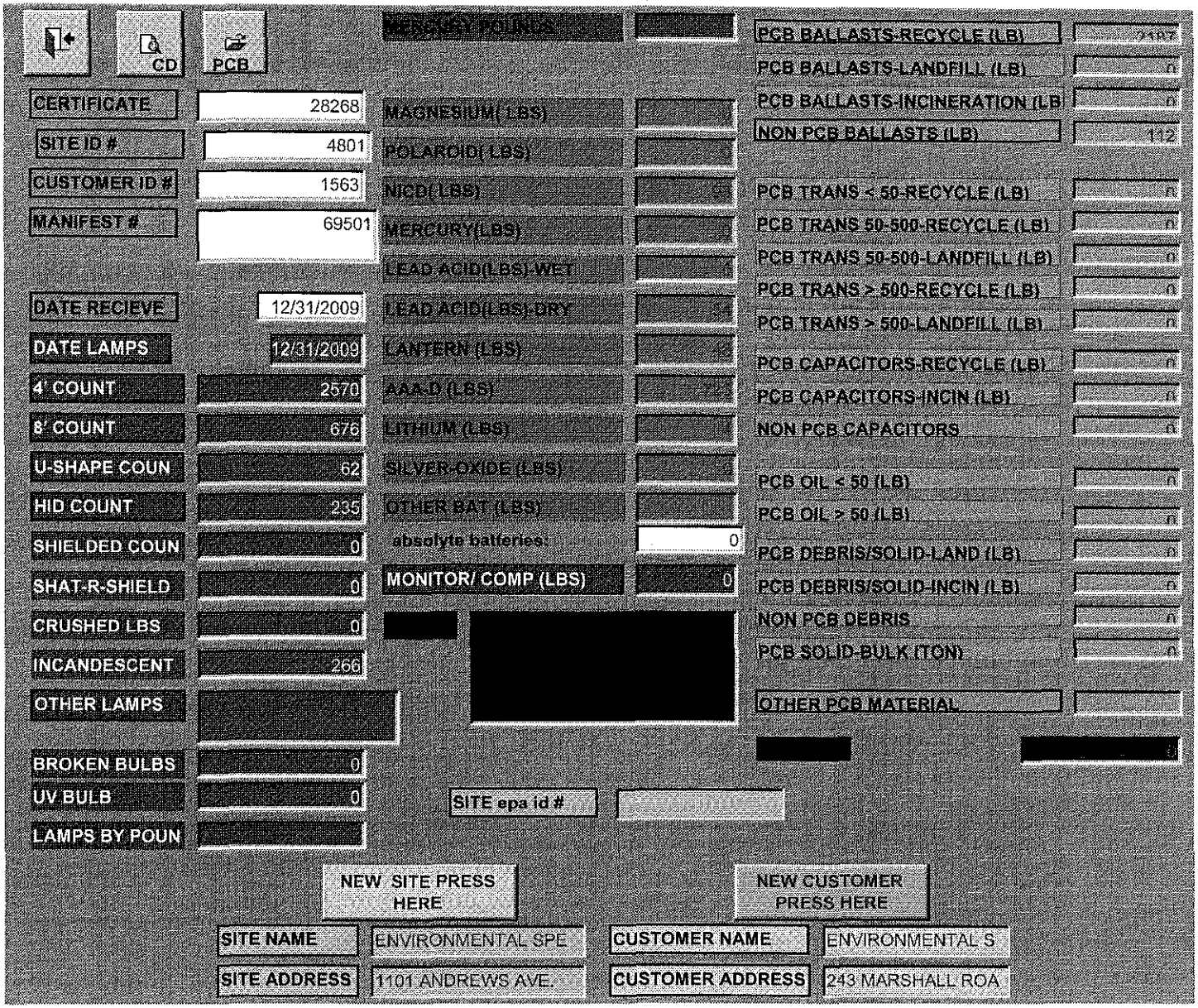
Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as a 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.

Signature	Name and Official Title (Type of Print)	Date Signed
Paul Cottrell	Paul Cottrell President	3/11/10

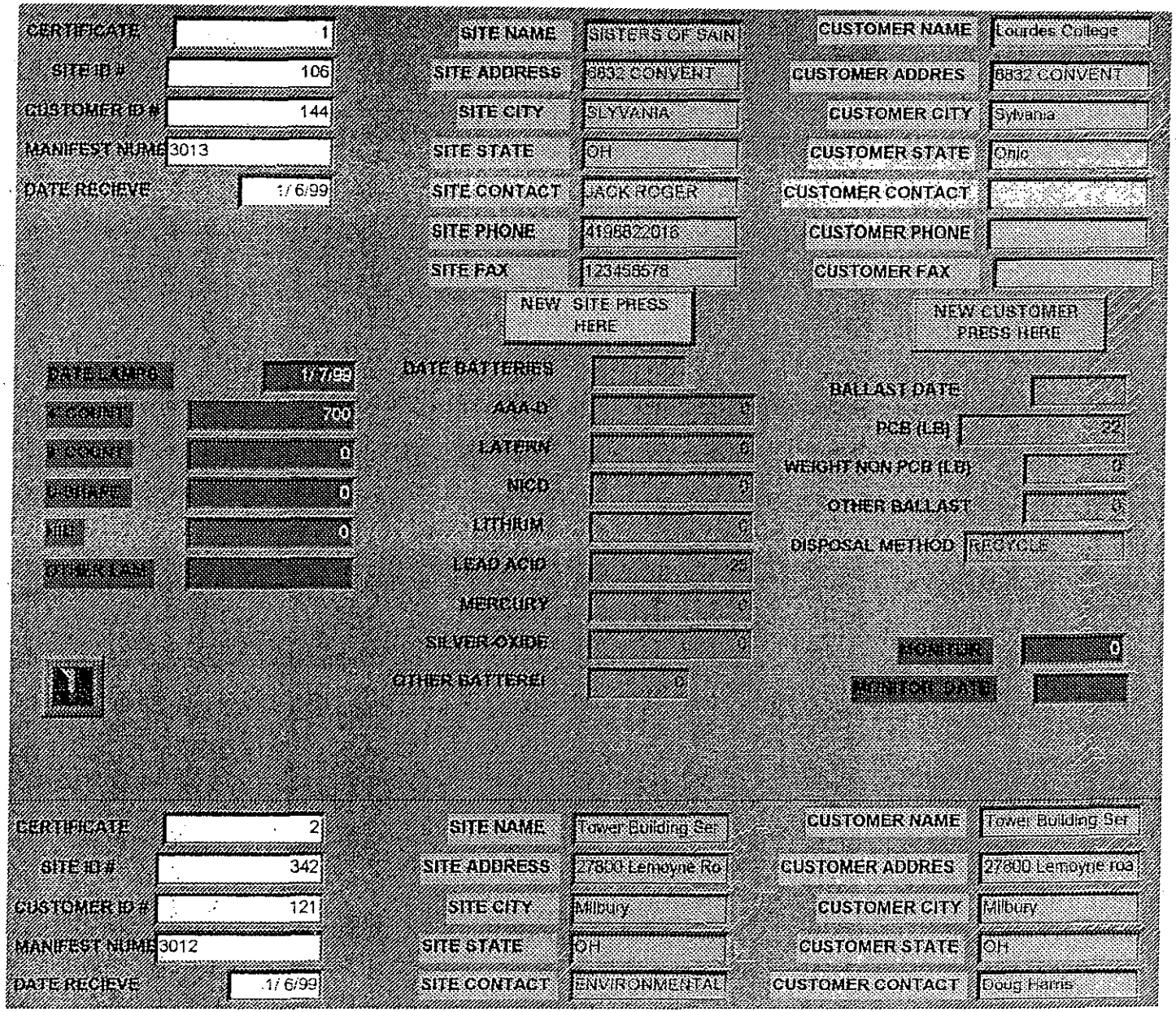
Paperwork Reduction Act Notice

The annual public burden for this collection of information is estimated to average 0.57 hours per response. This estimate includes time for reading instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division, U.S. Environmental Protection Agency (mail code 2822), 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460-0001. Include the OMB number identified above in any correspondence. Do not send the completed form to this address. The actual information or form should be submitted in accordance with the instructions accompanying the form, or as specified in the corresponding regulations.

APPENDIX G.II


CD
PCB
CERTIFICATE
28268
SITE ID #
4801
CUSTOMER ID #
1563
MANIFEST #
69501
DATE RECIEVE
12/31/2009
DATE LAMPS
12/31/2009
4' COUNT
2570
8' COUNT
676
U-SHAPE COUN
62
HID COUNT
235
SHIELDED COUN
0
SHAT-R-SHIELD
0
CRUSHED LBS
0
INCANDESCENT
266
OTHER LAMPS
BROKEN BULBS
0
UV BULB
0
LAMPS BY POUN
MERCURY POUNDS
MAGNESIUM(LBS)
POLAROID(LBS)
NICD(LBS)
MERCURY(LBS)
LEAD ACID(LBS)-WET
LEAD ACID(LBS)-DRY
LANTERN (LBS)
AAA-D (LBS)
LITHIUM (LBS)
SILVER-OXIDE (LBS)
OTHER BAT (LBS)
absolyte batteries:
0
MONITOR/ COMP (LBS)
0
PCB BALLASTS-RECYCLE (LB)
PCB BALLASTS-LANDFILL (LB)
PCB BALLASTS-INCINERATION (LB
NON PCB BALLASTS (LB)
112
PCB TRANS < 50-RECYCLE (LB)
PCB TRANS 50-500-RECYCLE (LB)
PCB TRANS 50-500-LANDFILL (LB)
PCB TRANS > 500-RECYCLE (LB)
PCB TRANS > 500-LANDFILL (LB)
PCB CAPACITORS-RECYCLE (LB)
PCB CAPACITORS-INCIN (LB)
NON PCB CAPACITORS
PCB OIL < 50 (LB)
PCB OIL > 50 (LB)
PCB DEBRIS/SOLID-LAND (LB)
PCB DEBRIS/SOLID-INCIN (LB)
NON PCB DEBRIS
PCB SOLID-BULK (TON)
OTHER PCB MATERIAL
SITE epa id #
NEW SITE PRESS HERE
NEW CUSTOMER PRESS HERE
SITE NAME
ENVIRONMENTAL SPE
SITE ADDRESS
1101 ANDREWS AVE.
CUSTOMER NAME
ENVIRONMENTAL S
CUSTOMER ADDRESS
243 MARSHALL ROA

SITE CITY	YOUNGSTOWN	CUSTOMER CITY	McDONALD
SITE STATE	OH	CUSTOMER STATE	OH
SITE CONTACT	MARK GROVER	CUSTOMER CONTACT	KEN WALLS
SITE PHONE	(330) 746-0748	CUSTOMER PHONE	(330) 530-0700
SITE PHONE 2		CUSTOMER PHONE 2	
SITE FAX		CUSTOMER FAX	(330) 530-2470
		PRICING CODE	


CERTIFICATE 1
SITE ID # 106
CUSTOMER ID # 144
MANIFEST NUME 3013
DATE RECIEVE 1/ 6/99
SITE NAME SISTERS OF SAIN
SITE ADDRESS 6832 CONVENT
SITE CITY SLYVANIA
SITE STATE OH
SITE CONTACT JACK ROGER
SITE PHONE 4198622016
SITE FAX 123456578
CUSTOMER NAME Lourdes College
CUSTOMER ADDRES 6832 CONVENT
CUSTOMER CITY Sylvania
CUSTOMER STATE Ohio
CUSTOMER CONTACT
CUSTOMER PHONE
CUSTOMER FAX
NEW SITE PRESS HERE
NEW CUSTOMER PRESS HERE
DATE LAMPS 1/7/99
COUNT 700
COUNT 0
U SHAPE 0
MIL 0
OTHER LAMP
DATE BATTERIES
AAA-D 0
LATERN 0
NICD 0
LITHIUM 0
LEAD ACID 0
MERCURY 0
SILVER OXIDE 0
OTHER BATTERE 0
BALLAST DATE
PCB (LB) 22
WEIGHT NON PCB (LB) 0
OTHER BALLAST 0
DISPOSAL METHOD RECYCLE
MONITOR 0
MONITOR DATE
CERTIFICATE 2
SITE ID # 342
CUSTOMER ID # 121
MANIFEST NUME 3012
DATE RECIEVE 1/ 6/99
SITE NAME Tower Building Ser
SITE ADDRESS 27800 Lemoyne Ro
SITE CITY Milbury
SITE STATE OH
SITE CONTACT ENVIRONMENTAL
CUSTOMER NAME Tower Building Ser
CUSTOMER ADDRES 27800 Lemoyne roa
CUSTOMER CITY Milbury
CUSTOMER STATE OH
CUSTOMER CONTACT Doug Harris

PCB RECIEVED

4/26/99

CERTIFICATE	SITE ID #	CUSTO	MANIFEST #	DATE RECIEVED	SITE NAME	DATE SAL	WEIGHT PCB	WEIGHT NON-PCB	WEIGHT OTHER	DISPOSAL
1	106	144	3013	1/ 6/99	SISTERS OF SAINT FRANCIS		22	0	0	RECYCLE
3	351	44	3001	1/ 7/99	GENERAL MOTORS-Paint and		0	171	0	RECYCLE
11	724	164	HP00423	1/11/99	AEROQUIP		0	1550	0	RECYCLE
27	152	66	3035	1/15/99	MUNSON MEDICAL CENTER		528	6259	0	RECYCLE
23	262	30	120298	1/15/99	General Electric-NETA Park		1400	2792	0	LANDFILL
21	155	30	1899	1/15/99	CHEMICAL ANALYTICS		14	0	0	RECYCLE
38	730	225	011999	1/19/99	dana corporation		255	0	0	RECYCLE
48	193	225	122298	1/25/99	RICERCA		33	0	0	RECYCLE
59	732	7	012799	1/27/99	PERRY SCHOOLS		11134	0		LANDFILL
62	66	38	3104	1/28/99	THERMO DISC		238	0	0	RECYCLE

APPENDIX G.III

PCB VOLUNTARY FORM FOR THE ANNUAL REPORT

Name of Submitter and Telephone Number: S.D. Myers, Inc.

(216) 633-2666

Name and Address of Facility: S.D. Myers, Inc.

180 SOUTH AVENUE TALLMADGE, OHIO 44278

EPA ID#:(on-site) OH-D053576294 (mobile) OH-D986977437

Check One: Commercial Storer___ Disposer___ Both_X__

This Report Covers Calender Year: 1997 JANUARY 1 TO DECEMBER 31

1. Amount of PCB waste (kg) in the following items in storage at the facility at the beginning of the calendar year:

a) PCB Large Low and High Voltage Capacitors:	59,255	kg
b) PCB Article Containers:	0	kg
c) PCB Transformers:	484,442	kg
* Oil From Transfomers.	8,744	kg
d) Bulk:	102,360	kg
e) PCB Containers:	66,368	kg

2. Amount of PCB waste (kg) in the following items received or generated by the facility during the calendar year:

a) PCB Large Low and High Voltage Capacitors:		
1) Received:	180,532	kg
2) Generated:	0	kg

b) PCB Article Containers:

1) Received: 513 kg

2) Generated: 0 kg

c) PCB Transformers:

1) Received: 3,917,772 kg

* Oil From Transfomers. 322,417 kg

2) Generated: 0 kg

d) BULK:

1) Received: 3,027,051 kg

2) Generated: 673,477 kg

e) PCB Containers:

1) Received: 569,060 kg

2) Generated: 817,793 kg

3. Amount of PCB waste (in kg) in the following items that was tranferred to another facility during the calendar year:

a) PCB Large Low and High Voltage Capacitors: 0 kg

b) PCB Article Containers: 1,185 kg

c) PCB Transformers: 5,986 kg

* Oil from Transformers Shipped off-site 284,970 kg

d) Bulk: 3,245,500 kg

e) PCB Containers: 30,519 kg

4. Amount of PCB waste (in kg) in the following items that was disposed of at the facility during the calendar year:

a) PCB Large Low and High Voltage Capacitors: 216,154 kg

b) PCB Article Containers: 0 kg

c) PCB Transformers:	3,823,291	kg
* Oil from Transfomers:	33,029	kg
d) Bulk:	1,666,672	kg
e) PCB Containers:	180,232	kg

* Transfered to bulk for disposal.

5. Total number of the following items in Storage at the the beginning of the calendar year:

a) PCB Transformers:	319
b) PCB Large Low and High Voltage Capacitors:	1,675
c) PCB Article Containers:	0
d) PCB Containers:	448

6. Total number of the following received or generated by the facility during the calendar year:

a) PCB Transformers:	
1) Received:	2,020
2) Generated:	0
b) PCB Large Low and High Voltage Capacitors:	
1) Received:	5,814
2) Generated:	0
c) PCB Article Containers:	
1) Received:	5
2) Generated:	0
d) PCB Containers:	
1) Received:	3,396
2) Generated:	2,901

7. Total number of the following items transferred to another facility during the calendar year:

a)	PCB Transformers:	1
b)	PCB Large Low and High Voltage Capacitors:	0
c)	PCB Article Containers:	13
d)	PCB Containers:	185

8. Total number of the following items disposed of at the facility during the calendar year:

a)	PCB Transformers:	1,821
b)	PCB Large Low and High Voltage Capacitors:	6,883
c)	PCB Article Containers:	0
d)	PCB Containers:	1,633

* Transfered to Bulk for Disposal

9. Total weight (in kg) of the following items remaining in storage at the facility at the end of the calendar year:

a)	PCB Large Low and High Voltage Capacitors:	22,961	kg
b)	PCB Article Containers:	0	kg
c)	PCB Transformers:	572,937	kg
*	Oil from Transfomers:	17,731	kg
d)	Bulk:	201,918	kg
d)	PCB Containers:	49,355	kg

10. Total number of the following items remaining in storage at the facility at the end of the calendar year:

a)	PCB Transformers:	517
b)	PCB Large Low and High Voltage Capacitors:	598
c)	PCB Article Containers:	0
d)	PCB Containers:	285

CHAPTER 3
CLOSURE COST ESTIMATE

This chapter contains the Environmental Recycling. (ER) Closure Cost Estimate as required by 40 CFR 761.65(f). This Closure Cost Estimate provides a detailed estimate, in current dollars, of the cost of closing the ER Commercial Recycling Facility in accordance with its approved closure plan (see Chapter 2) and includes the required certification.

This chapter contains the Environmental Recycling. (ER) Closure Cost Estimate as required by 40 CFR 761.65(f). This Closure Cost Estimate provides a detailed estimate, in current dollars, of the cost of closing the ER Commercial Recycling Facility in accordance with its approved closure plan (see Chapter 2) and includes the required certification.

TABLE OF CONTENTS

APPENDIX

INTRODUCTION

This closure cost estimate is reflective of the current costs to close ER' Commercial Recycling Facility when the extent and manner of recycling operations would make the closure the most expensive, as indicated by the closure plan (see Chapter 2, Section E).

This closure cost estimate is based upon current dollar estimates from experienced contractors and the costs that a third party would charge to conduct the closure activities. The estimated cost is based on the following assumptions:

- the ER Commercial Recycling Facility contains its maximum inventory (as indicated in Section E-2, Maximum Inventory);
- all equipment in the ER Recycling Storage Facility are to be decontaminated or disposed of per EPA regulations;
- all rinsates are assumed to be wastes; and will be tested prior to disposal
- 85 samples including both wipe and scrape (destructive) analyses will be required.

PCB wastes received at ER are always stored within the secured containment areas of the PCB Storage Area. The design of the ER Commercial Recycling Facility and the standard operating procedures followed by the ER personnel handling these materials presupposes that contamination levels in the areas adjacent to the ER Commercial Drum Storage area above the regulated level are not expected. Cost estimates will be adjusted annually within 30 days of the anniversary date of the established financial instrument used to demonstrate financial responsibility. The latest closure cost estimate will be kept at the facility. Cost estimates are based upon current estimates from experienced contractors.

FINAL CLOSURE COST ESTIMATE FOR THE ER COMMERCIAL RECYCLING FACILITY

Storage Area

1. 50 Drums of Fluorescent Light Ballasts
   50 drums at $65.00 each — $3250

2. PCB article containers
   10 drums approximately 250 pounds each
   10 drums X 250/lbs X $0.90 — $2250

3. 1 Drum decon water — $250

4. PCB-contaminated electrical equipment
   5 units
   5 units X $25/unit — $125

5. PCB transformers
   (1) 125 cubic foot unit
   (1) 125 ft3 X $5.50/ft3 — $688

6. PCB Storage Area Equipment
   (1) cubic yard box — $125

Subtotal Storage Areas Disposal Costs — $6688

Transportation Costs (10% of Subtotal) — $669

TOTAL STORAGE AREAS DISPOSAL COSTS — $7357

(All disposal cost estimates are reflective of the current dollar value for labor, equipment rental/use/replacement, and transportation/disposal.)

Cleaning, Disposal, Sampling Costs

1. Decontamination, of the interior 45' X 30' area and access approach aprons.

(Assumes that the both the interior and access approach aprons need decontamination.)

Estimate 1 days @ $200/day $200
Disposal of cleaning wash waters in disposal cost already

2. Pre-cleanup screening samples and analysis

Estimate 2-man crew 4 hours
@ $40.00/hr/man $160 $320

85 sample bottles and analysis (pre cleanup)
@ average cost of $45.00/per analysis $3825

2. Post cleanup wipe/scrape samples and analysis

Estimate 2-man crew 4 hours
@ $40.00/hr/man $160 $320

85 sample bottles and analysis (post cleanup)
@ average cost of $45.00/per analysis $3825

3. One drum disposable cleanup items
(solids) @ $65/drum $65

(Contents of these drums include such items as personal protective equipment, templates, brooms, squeegees, absorbents pads, gloves, overboots, etc., which were used during the screening sampling phase of closure and, assuming the worst, those items used during the decontamination and verification sampling of the PCB storage areas.)

3. If need estimated (1) 20 cubic yard box $2300
(solids) concrete/soil

TOTAL ESTIMATE CLEANUP $10855

SUBTOTAL OF CLOSURE COSTS	$18212
Documentation and Certification 10% of Subtotal	$1822
Contingency 10% of Subtotal	$1822
TOTAL ESTIMATE FOR CLOSURE OF ER's COMMERCIAL PCB STORAGE FACILITY	**$21856**

UPDATED FINAL CLOSURE COST ESTIMATE FOR THE ER COMMERCIAL RECYCLING FACILITY

Storage Area

1.	12.5 Cubic Yards of Fluorescent Light Ballasts 1 yard @$95.00	$1187.50
2.	PCB article containers 10 drums approximately 250 pounds each 10 drums X 250/lbs X $1.07	$2675
3.	1 Drum decon water	$250
4.	PCB-contaminated electrical equipment 5 units 5 units X $25/unit	$125
7.	PCB transformers (1) 125 cubic foot unit (1) 125 ft3 X $6.35/ft3	$793.75
8.	PCB Storage Area Equipment (1) cubic yard box	$125
Subtotal Storage Areas Disposal Costs		**$5155.75**
Transportation Costs (10% of Subtotal)		**$515.58**
TOTAL STORAGE AREAS DISPOSAL COSTS		**$5671.33**

(All disposal cost estimates are reflective of the current dollar value for labor, equipment rental/use/replacement, and transportation/disposal.)

Cleaning, Disposal, Sampling Costs

4. Decontamination, of the interior 45' X 30' area and access approach aprons.

   (Assumes that the both the interior and access approach aprons need decontamination.)

   Estimate 1 days @ $200/day $200
   Disposal of cleaning wash waters in disposal cost already

2. Pre-cleanup screening samples and analysis

   Estimate 2-man crew 4 hours
   @ $40.00/hr/man $160 $320

   85 sample bottles and analysis (pre cleanup)
   @ average cost of $55.00/per analysis $4675.00

5. Post cleanup wipe/scrape samples and analysis

   Estimate 2-man crew 4 hours
   @ $40.00/hr/man $160 $320

   85 sample bottles and analysis (post cleanup)
   @ average cost of $55.00/per analysis $4675.00

3. One drum disposable cleanup items
   (solids) @ $80/drum $80

(Contents of these drums include such items as personal protective equipment, templates, brooms, squeegees, absorbents pads, gloves, overboots, etc., which were used during the screening sampling phase of closure and, assuming the worst, those items used during the decontamination and verification sampling of the PCB storage areas.)

6. If need estimated (1) 20 cubic yard box $2300
   (solids) concrete/soil

TOTAL ESTIMATE CLEANUP $12570

SUBTOTAL OF CLOSURE COSTS	$18241.33
Documentation and Certification 10% of Subtotal	$1824.13
Contingency 10% of Subtotal	$1824.13
TOTAL ESTIMATE FOR CLOSURE OF ER's COMMERCIAL PCB STORAGE FACILITY	**$21889.59**

Adjustments to Final Closure Costs

Initial Trust Fund Amount $ 19,881.00

Implicit Price Deflator, GNP	(1999, 1st Quarter)	97.33
Implicit Price Deflator, GNP	(2000, 1st Quarter)	99.311

(Latest Deflator / Previous Deflator) * Previous Trust Fund Amount = Required Funds

(99.311 / 97.33) * 19881 = $ 20,285.65 **2000 Requirement**

Implicit Price Deflator, GNP	(2000, 1st Quarter)	99.311
Implicit Price Deflator, GNP	(2001, 1st Quarter)	101.48

(101.48 / 99.311) * 20285.65 = $ 20,728.69 **2001 Requirement**

Implicit Price Deflator, GNP	(2001, 1st Quarter)	101.48
Implicit Price Deflator, GNP	(2002, 1st Quarter)	103.552

(103.552 / 101.48) * 20728.69 = $ 21,151.93 **2002 Requirement**

Implicit Price Deflator, GNP	(2002, 1st Quarter)	103.552
Implicit Price Deflator, GNP	(2003, 1st Quarter)	105.718

(105.718 / 103.552) * 21151.93 = $ 21,594.37 **2003 Requirement**

Implicit Price Deflator, GNP	(2003, 1st Quarter)	105.718
Implicit Price Deflator, GNP	(2004, 1st Quarter)	108.177

(108.177 / 105.718) * 21594.37 = $ 22,096.65 **2004 Requirement**

Implicit Price Deflator, GNP	(2004, 1st Quarter)	108.177
Implicit Price Deflator, GNP	(2005, 1st Quarter)	111.525

(111.525 / 108.177) * 22096.65 = $ 22,780.53 **2005 Requirement**

Implicit Price Deflator, GNP	(2005, 1st Quarter)	111.525
Implicit Price Deflator, GNP	(2006, 1st Quarter)	114.942

(114.942 / 111.525) * 22780.53 = $ 23,478.49 **2006 Requirement**

Implicit Price Deflator, GNP	(2006, 1st Quarter)	114.942
Implicit Price Deflator, GNP	(2007, 1st Quarter)	118.736

(118.736/114.942)*23478.49= $ 24,253.47 **2007 Requirement**

Implicit Price Deflator, GNP	(2007, 1st Quarter)	118.736
Implicit Price Deflator, GNP	(2008, 1st Quarter)	121.495

(121.495/118.736)*24253.47= $ 24,817.04

Adjustments to Final Closure Costs - PCB Permit

Initial Funding $ 19,881.00

Calculated utilizing Index 2005=100, Gross Domestic Product: Implicit Price Deflator

Calculation:

(latest deflator/previous deflator)*previous fund amount=funds required

Year	Initial	Final	Funds Required
2000	86.298	87.924	$ 20,255.59
2001	87.924	89.979	$ 20,729.01
2002	89.979	91.469	$ 21,072.28
2003	91.469	93.496	$ 21,539.25
2004	93.496	95.626	$ 22,029.95
2005	95.626	98.766	$ 22,753.33
2006	98.766	102.071	$ 23,514.72
2007	102.071	105.310	$ 24,260.91
2008	105.310	107.534	$ 24,773.27
2009	107.534	109.691	$ 25,270.19
2010			
2011			
2012			
2013			
2014			
2015			

Account Statement

ENVIRONMENTAL RECYCLING T/A 20-10-216-0597100

January 1, 2010 - January 31, 2010

Portfolio Summary

Principal Assets	*Value on 1/1*	*Value on 1/31*	*Estimated annual income*	*Unrealized gain/loss*
Cash equivalents	$21,856.00	$21,856.00	$55	
Total principal assets	**$21,856.00**	**$21,856.00**	**$55**	**$0.00**
Income Assets				
Cash equivalents	5,612.82	5,619.57	14	
Total income assets	**$5,612.82**	**$5,619.57**	**$14**	**$0.00**
Total portfolio value	**$27,468.82**	**$27,475.57**	**$69**	**$0.00**

Activity Summary

Total portfolio value on 1/1	**$27,468.82**
Dividends, Interest and other income	6.75
Net change in market value of securities	0.00
Total portfolio value on 1/31	**$27,475.57**

Income Summary

Federally Tax-Exempt	*This period*	*Year-to-date*
Money Market Dividends	$6.75	$6.75
Total federally tax-exempt	**$6.75**	**$6.75**
Total income	**$6.75**	**$6.75**

This is for informational purposes only and is not tax advice. Please see your tax advisor for tax advice.

001-NO-20100201-04-250-0000001-NNNN-

CERTIFICATION

Under the civil and criminal penalties of law for making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this closure cost estimate is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and 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.

Signature _____

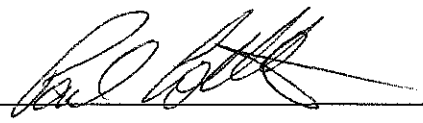
Name Michael Dolkowski

Title Environmental Engineer cccm# 5014

Date 6-23-2000

CERTIFICATION

Under the civil and criminal penalties of law for making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this closure cost estimate is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and 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.

Signature 

Name Paul Cottrell

Title President

Date 3/11/10

APPENDIX I

QUOTATIONS

QUOTE WORKSHEET
No. Q703000715
Page 01

VEOLIA
ENVIRONMENTAL SERVICES

MANIFEST FROM:	RETURN MANIFEST TO:	CERTIFICATE TO:
ENVIRONMENTAL RECYCLING **527 E. WOODLAND CIRCLE** **BOWLING GREEN, OH 43402**	***** Same Address *****	***** Same Address *****

CONTACT: **MIKE DOLKOWSKI**	QUOTE DATE: **07/01/2009**	TERRITORY: **X30**
PHONE: **(800) 284-9107**	FAX:	SALES REP: **SCOTT BROWN**

Line	Service	Description	Quantity	Price	Unit	Extension
	Waste Stream:	PCB OIL	1.00	300.00	EA	$300.00
	Technology:	Incineration-thermal destruct.				
	Facility:	VEOLIA ES TECHNICAL SOLUTIONS				
	UOM/Container:	55 GALLON DRUM				
		WIP#: 88280 APPROVAL #: PTA088280				
		PCB'S >10,000 ppm				
	Waste Stream:	PCB OIL	1.00	250.00	EA	$250.00
	Technology:	Incineration-thermal destruct.				
	Facility:	VEOLIA ES TECHNICAL SOLUTIONS				
	UOM/Container:	55 GALLON DRUM				
		WIP#: 88292 APPROVAL #: PTA088292				
		PCB'S 500 - 10,000 ppm				
	Waste Stream:	PCB OIL	1.00	200.00	EA	$200.00
	Technology:	Incineration-thermal destruct.				
	Facility:	VEOLIA ES TECHNICAL SOLUTIONS				
	UOM/Container:	55 GALLON DRUM				
		WIP #: 88297 APPROVAL #: PTA088297				
		PCB'S <500 ppm				
	Waste Stream:	PCB CAPACITORS	1.00	1.02	EA	$1.02
	Technology:	Incineration-thermal destruct.				
	Facility:	VEOLIA ES TECHNICAL SOLUTIONS				
	UOM/Container:	POUNDS				
		WIP #: 87688 APPROVAL #: VCGPTAVES092				

QUOT' 'N WORKSHEET
No. Q7u3000715
Page 02

VEOLIA
ENVIRONMENTAL SERVICES

MANIFEST FROM:	RETURN MANIFEST TO:	CERTIFICATE TO:
ENVIRONMENTAL RECYCLING **527 E. WOODLAND CIRCLE** **BOWLING GREEN, OH 43402**	***** Same Address *****	***** Same Address *****

CONTACT: **MIKE DOLKOWSKI**	QUOTE DATE: **07/01/2009**	TERRITORY: **X30**
PHONE: **(800) 284-9107**	FAX:	SALES REP: **SCOTT BROWN**

Line	Service	Description	Quantity	Price	Unit	Extension
		Pricing is per pound.				
	Waste Stream:	PCB BALLASTS	1.00	1.02	EA	$1.02
	Technology:	Incineration-thermal destruct.				
	Facility:	VEOLIA ES TECHNICAL SOLUTIONS				
	UOM/Container:	POUNDS				
		WP#: 87688 APPROVAL #: VGCPTAVES092				
		Pricing is per pound.				
	Waste Stream:	PCB DEBRIS	1.00	0.97	EA	$0.97
	Technology:	Incineration-thermal destruct.				
	Facility:	VEOLIA ES TECHNICAL SOLUTIONS				
	UOM/Container:	POUNDS				
		WP#: 86763 APPROVAL #: VGCPTAVES071				
		Pricing is per pound with a $165.00/drum				
	Miscellaneous:	ENERGY & SECURITY SURCHARGE	1.00	0.06	PERCNT	$0.06

All ONYX Terms and Conditions described in the previous pages will apply.

CHAPTER 4
FINANCIAL RESPONSIBILITY

This chapter discusses the mechanism that Environmental Recycling (ER) has selected to meet its financial responsibility as required by TSCA regulations 40 CFR 761.65(d)(2)(v) and 761.65(g). The amount of financial assurance required for ER Commercial Recycling Facility is based upon the closure cost estimate (see Chapter 3), which reflects the costs of implementing the Closure Plan (see Chapter 2). Financial assurance will be maintained in accordance to the requirements established in 40 CFR 761.65(g)(1) for the "closure trust fund" and with the requirements for an annual adjustment as reflected in 40 CFR761.65(f)(2).

TABLE OF CONTENTS

1 INTRODUCTION

In accordance with the requirements of 40 CFR 761.65(d)(2)(v), ER has selected, from the financial assurance options presented in 40 CFR 761.65(g), the "closure trust fund" as the instrument to meet its closure financial responsibility (see Appendix I). The amount set aside in this closure trust mechanism is reflective of the costs required to close the ER Commercial Recycling Facility in accordance with the closure plan.

2 CLOSURE TRUST FUND

As indicated by the documents provided in Appendix I, Environmental Recycling has established a trust fund in anticipation of EPA Region V's conditional approval of the ER Recycling Facility at:

Environmental Recycling
527 East Woodland Circle
Bowling Green, Ohio 43402

EPA ID No. OHR 000034025

The Closure Cost Estimate (Chapter 3) as of ~~April 23, 1999~~ **February 23, 2010** is reflective of the actual costs to achieve clean closure of the ER Commercial Recycling Facility by a third party and is reflective of the current market costs for the off-site disposal at licensed facilities of ER maximum estimated inventory of PCB wastes.

ER is aware that during the active life of the ER Commercial Recycling Facility there is to be an annual adjustment to the closure cost estimate to account for inflation. This adjustment must be determined within 60 days prior to the anniversary date of the establishment of the closure trust fund.

The adjustment will be made either by recalculating the maximum costs of closure in current dollars or by using an inflation factor derived from the most recent Implicit Price Deflator for Gross National Product published by the U.S. Department of Commerce in its Survey of Current Business.

Based on the updated cost estimate, ER will make annual payments throughout the pay-in period and will increase the annual payment in accordance with the closure cost estimate adjustment. Following the pay-in period, ER will increase the final value of the trust fund (or add a new mechanism) within 60 days of an increase in the closure cost estimate, unless the amount of money in the trust fund is at least as great as the increased cost estimate.

ER is also aware that the value of the trust may exceed the adjusted cost estimates and may request the Regional Administrator to return the excess. Following a review of the documentation which verifies that the current value of the trust exceeds the current cost

estimate, the Regional Administrator may instruct the trustee to release the appropriate amount of funds.

In accordance with the requirements of 40 CFR 761.65(g)(1)(i), ER understands that the initial payment into the trust fund must be made within 30 calendar days after the EPA has notified ER that the application has been conditionally approved, pending EPA's review and approval of ER trust fund and conformation of the initial payment.

ER will make annual payments into the trust fund over a three (3) year pay-in period. Upon notification of conditional approval, ER will deposit into the trust fund one-third of the current closure cost estimate. No later than 30 days after each anniversary date of the first payment made into the trust fund the next one-third of the closure cost estimate will be deposited into the trust fund, etc. The amount of the second and third deposits into the trust fund will be determined by subtracting the current value of the trust fund from the current closure cost and dividing this difference by the years remaining in the pay-in period. After this initial pay-in period, ER will continue to adjust the closure trust fund to account for annual inflation increases.

As mentioned above, the annual inflation adjustment may be made by recalculating the maximum cost of the closure in current dollars or by using an inflation factor derived from the most recent Implicit Price Deflator for Gross National Product published in by the U.S. Department of Commerce in its *Survey of Current Business*. The inflation factor used in this latter method is the result of dividing the latest published annual Deflator by the Deflator for the previous year. The adjustment to the closure cost estimate is then made by multiplying the most recent closure cost estimate by the latest inflation factor.

Should ER find it necessary to modify its closure plan and this modification (made by ER) is approved by the Regional Administrator, ER will revise its closure cost estimate no later than 30 days after the modification is approved, if the modification increases the cost of closure.

ER will, during the operating life of its Commercial PCB Storage Facility, retain at its facility the most recent closure cost estimate, including any adjustments resulting from inflation or from modifications to the closure cost estimate.

3 REIMBURSEMENTS FROM THE TRUST

As closure activities are carried out by ER or another person authorized by the Regional Administrator, itemized bills will be submitted to the Regional Office with request for reimbursements. When reviewing itemized bills, the Regional Administrator will:

- determine within 60 days of the request for reimbursement whether the expenses are reasonable, justified, and consistent with the approved closure plans.

- approve the request for reimbursement and direct payment within 60 days of the request for reimbursement unless there is reason to believe that the remaining costs of closure will be significantly greater than available funds, or that the incurred costs are not in accordance with the approved closure plan (or not otherwise justifiable). If this occurs, reimbursements may be withheld until proper closure has been completed and certified.

- determine if the reimbursement is appropriate for expenditures caused by a contingent event such as bad weather or an accident during closure. These decisions will have to be made by the Regional Administrator on a case-by-case basis. ER, however, remains ultimately responsible for all closure costs even if the financial assurance funds are exhausted.

4 TERMINATING THE TRUST

The Regional Administrator may consent to the termination of the trust only if:

- ER substitutes an alternate assurance mechanism; or

- The Regional Administrator, within 60 days after receiving certification from ER and an independent registered professional engineer that final closure has been completed in accordance with the approved closure plan, will notify ER in writing that ER is no longer required by 40 CFR 761.65(g) to maintain financial assurance for final closure of the facility.

CHAPTER 5
DISCLOSURE STATEMENT

The information provided in this chapter is submitted in accordance with the requirements of 40 CFR 761.65 (d)(2)(vii) and 40 CFR 761.65 (d)(3). This section includes information in reference to Environmental Recycling. (ER) compliance history, principals and key employees qualifications, and the compliance history of the principals and key employees.

TABLE OF CONTENTS

APPENDIX

1 GENERAL INFORMATION

This disclosure statement is prepared in accordance with the applicable requirements as stated in the Toxic Substances Control Act (TSCA) of 1976, as amended and TSCA regulations in 40 CFR 761.65(d)

2 HISTORY OF ENVIRONMENTAL RECYCLING

Environmental Recycling ("Environmental Recycling" or "ER"), a Michigan Corporation (Lamps, Inc. – (DBA) Environmental Recycling) headquartered in Bowling Green Ohio, provides full services in the management of industrial and hazardous waste, remedial action programs, and site decontamination. Environmental Recycling, with 28 years of combined experience, has earned its reputation by being responsive to the specific needs of each customer and by using the latest equipment and a well-trained, experienced staff.

In response to the increasing environmental compliance needs of industry, Environmental Recycling has diversified and expanded its technical capabilities over the past ~~5~~ **15** years. Because of its diversified approach and because it is not tied to any one reclamation process or disposal method, Environmental Recycling can provide vigorous attention to each customer's specific needs, using its full resources and extensive experience to provide the most environmentally sound and cost-effective solutions.

Environmental Recycling began in 1995 with Engineers and Chemists who have had extensive experience handling Emergency Response, PCB activities, PCB Commercial Storage Facility Operations, Hazardous Waste Management, while working under other firms.

3 FULL NAME and BUSINESS ADDRESS

3a Applicant
Environmental Recycling
527 East Woodland Circle
Bowling Green, OH 43402

3b Owner/Operator of the Facility (who owns or controls, directly or indirectly, more than 5% of each partnership, corporation, or other business organization and all officials of the facility who have direct management responsibility for the facility)

Environmental Recycling
527 East Woodland Circle
Bowling Green, OH 43402
Attention: ~~Mike Dolkowski-President~~
Paul Cottrell - President

Paul Cottrell-President
Erik Thayer-Vice President/Secretary
Mike Dolkowski-Partner
Mike House- Partner
~~(all equally own and operate ER)~~

3c Persons Responsible for the Overall Operations of the Facility and Supervisory Employees Responsible for the Operation of the Facility

~~Mike Dolkowski-CECM~~
~~Environmental Engineer~~
~~President~~

~~Erik Thayer-Chemist~~
~~Facility Manager~~
~~PCB Coordinator~~

~~Paul Cottrell~~
~~Civil Engineer~~
~~Transportation/Personal~~

Paul Cottrell
Civil Engineer
President

Erik Thayer-Chemist
Vice President
Secretary

Matt Zachary
Facility/PCB Manager
Transportation/Personal

3d Technical Qualifications and Experience of Persons Responsible for the Overall Operations of the Facility and Employees Responsible for Handling PCB Waste

Technical qualification statements are provided in Appendix I, for those individuals identified above.

3e Past State or Federal Environmental Violations Involving ER or Another Business With Which the Principals or Supervisory Employees Were Affiliated Directly (within five [5] years preceding the submittal of this application/**Renewal** and which related directly to violations that resulted in either a civil penalty or judgment of conviction or civil injunctive relief and involved storage, transport, or other waste-handling activity)

During the past five (5) years, ER. has not received any state or federal environmental judgments of conviction.

APPENDIX I

Environmental Recycling™
Comprehensive Environmental Management Services

P.O. Box 167 • 527 East Woodland Circle • Bowling Green, OH 43402
Phone 419.354.6110 • Fax 419.354.5110
www.callerg.com

Paul Cottrell
Chief Financial Officer

Education, Certifications, and Associations, and Experience
Michigan State University, BS Civil Engineering
OSHA 40-Hour Hazardous Waste Operations
ASCE, American Society of Civil Engineers

Mr. Cottrell has considerable experience with project administration; plan development, site investigation, and site remediation, and sampling, characterizing, and properly classifying hazardous waste for a variety of waste management projects. Mr. Cottrell has managed projects in the private, industrial, and municipal sectors including: Project Manager of a wastewater treatment system for removal of PCBs from over 3M gallons of water during a PCB-contaminated sediment remediation project; Project Engineer for the removal and transportation of over 150 cubic yards of of lead contaminated insulation from four (4) 300,000-gallon tanks; Senior Engineer for an environmental firm with duties ranging from work plan review, project-estimating review, project cost control, management of existing projects, and subcontract review for projects ranging in size from $2,500.00 to $750,000.00. With ERG, Mr. Cottrell's responsibilities include directing the day-to-day operations of our transportation, scheduling, accounting, and project departments. In addition Mr. Cottrell is the facility engineer for ERG's Bowling Green facility.

Environmental Recycling™
Comprehensive Environmental Management Services

P.O. Box 167 • 527 East Woodland Circle • Bowling Green, OH 43402
Phone 419.354.6110 • Fax 419.354.5110
www.callerg.com

Erik Thayer
Chief Operating Officer

Education, Certifications, Associations, and Experience

Albion College, BA Chemistry
Confined Space Supervision
OSHA 40-Hour Hazardous Waste Operations
Asbestos Abatement Contractor
DACS, American Chemical Society

Mr. Thayer is highly qualified in hazard evaluation and monitoring, environmental chemistry, toxicology, and analytical techniques, and has directed numerous projects for industry involving the measurement and identification of hazardous chemicals.
Mr. Thayer's experience includes: Emergency Response Manager for mercury decontamination from residential Michcon mercury gas regulators; Labpack Chemist for Cleveland Cliffs mining company – audited, inventoried, categorized, collected, packaged, and stabilized explosive compounds from abandoned properties over the 48-month long project; Emergency Response Chemist for a variety of projects for major utilities and power companies, including clean up supervision and verification sampling following PCB transformer spills; Labpack Chemist for abandoned chemicals from the home lab of a University Professor, including stabilization of peroxides, ethers, and picric acids and management of over 25,000 different chemicals; Project Engineer for design and construction of a recycling technology for the separation and purification of dental amalgam capsules.
Mr.Thayer's research experience includes: Development of Radioactive Materials Transportation Export System. Integrated program using artificial intelligence programming with multi-media interface. Program developed as prototype for Hazardous Material Transportation Export System, research conducted at Oak Ridge National Laboratory through funding of Department of Energy under Dr. Juan J. Ferrada.
Mr. Thayer's responsibilities include directing the day-to-day operations of our recycling facility, maintaining and improving all quality control activities and maintaining a health and safety program within the confines of our plant.

Environmental Recycling™
Comprehensive Environmental Management Services

P.O. Box 167 • 527 East Woodland Circle • Bowling Green, OH 43402
Phone 419.354.6110 • Fax 419.354.5110
www.callerg.com

Matthew Zachary
Operations Manager Environmental Recycling, Bowling Green

Education, Training, Certifications, and Experience

- Bowling Green State University, BS Environmental Policy and Analysis
- OSHA 40-Hour Hazardous Waste Operations and 8-Hour Refresher
- Rail Car and Tanker Transfer Training, ERTC University of Findlay
- USWAG PCB Workshop, Columbus, OH
- NFPA 70 E Electrical Safety Training
- MSHA New Miner Training (Part 46, Part 48)
- CSX Railroad Certified
- DOT Hazmat Trained 49 CFR 172.704
- CDL Hazmat/Tanker Class B
- Confined Space Rescue/Entry
- RCRA Hazardous Waste Training

Mr. Zachary has many years of experience with regulation and remediation of hazardous waste, including over 10 years in the recycling industry and specific emergency and non-emergency response to releases of mercury, acids, diesel, gas, oil, unknowns, PCBs; response and remediation of illegal meth labs; management of site remediation, demolition, and UST removal projects.
On a daily basis Mr. Zachary manages ERs Universal Waste Destination and US-EPA Permitted PCB Commercial Storage Facility, including ensuring the proper handling, recycling, and disposal of mercury devices, universal waste, and PCBs in the form of transformers, oil, bushings, capacitors, and ballast.
Mr. Zachary has worked in coordination with EPA Emergency Response Division, Coast Guard, IDEM, and MDEQ and completed various spill remediation and waste tracking reports for said agencies.
Mr. Zachary is also experienced in the operation of heavy equipment such as excavators, bulldozers, loaders, and backhoes.

CHAPTER 6
CERTIFICATION

Under the civil and criminal penalties of law for making or submission of false or fraudulent statements or representations (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 and 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.

Signature _____

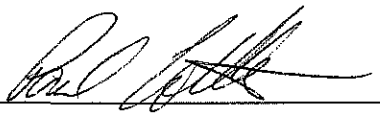
Name Michael Dolkowski

Title Environmental Engineer ceem# 5014

Date 6-23-2000

CHAPTER 6
CERTIFICATION

Under the civil and criminal penalties of law for making or submission of false or fraudulent statements or representations (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 and 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.

Signature 

Name Paul Cottrell

Title President

Date 3/11/10

IMPORTANT

If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

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).

DISCLAIMER

This Certificate of Insurance does not constitute a contract between the issuing insurer(s), authorized representative or producer, and the certificate holder, nor does it affirmatively or negatively amend, extend or alter the coverage afforded by the policies listed thereon.

CERTIFICATE OF LIABILITY INSURANCE

OP ID KH
SQS-001

DATE (MM/DD/YYYY)
12/14/09

PRODUCER

Hylant Group Inc - Toledo
811 Madison Ave
Toledo OH 43604
Phone: 419-255-1020 Fax: 419-255-7557

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

INSURED

Lamps, Inc. dba
Environmental Recycling
527 East Woodland Circle
Bowlilng Green OH 43402

INSURERS AFFORDING COVERAGE		NAIC #
INSURER A:	Zurich American Insurance Co	16535
INSURER B:	Steadfast Insurance Company	26387
INSURER C:	Accident Fund InsCo of America	10166
INSURER D:		
INSURER E:		

COVERAGES

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. AGGREGATE LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	ADD'L INSRD	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YYYY)	POLICY EXPIRATION DATE (MM/DD/YYYY)	LIMITS	
A		GENERAL LIABILITY [X] COMMERCIAL GENERAL LIABILITY [ ] CLAIMS MADE [X] OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: [ ] POLICY [X] PRO-JECT [ ] LOC	GL0916943102	12/13/09	12/13/10	EACH OCCURRENCE DAMAGE TO RENTED PREMISES (Ea occurence) MED EXP (Any one person) PERSONAL & ADV INJURY GENERAL AGGREGATE PRODUCTS - COMP/OP AGG Empl Liab	$1,000,000 $100,000 $5,000 $1,000,000 $2,000,000 $2,000,000 1,000,000
A		AUTOMOBILE LIABILITY [X] ANY AUTO [ ] ALL OWNED AUTOS [ ] SCHEDULED AUTOS [ ] HIRED AUTOS [ ] NON-OWNED AUTOS	BAP916943302	12/13/09	12/13/10	COMBINED SINGLE LIMIT (Ea accident) BODILY INJURY (Per person) BODILY INJURY (Per accident) PROPERTY DAMAGE (Per accident)	$1,000,000 $ $ $
		GARAGE LIABILITY [ ] ANY AUTO				AUTO ONLY - EA ACCIDENT OTHER THAN AUTO ONLY: EA ACC AGG	$ $ $
B		EXCESS / UMBRELLA LIABILITY [X] OCCUR [ ] CLAIMS MADE [ ] DEDUCTIBLE [X] RETENTION $10,000	SE0596330502	12/13/09	12/13/10	EACH OCCURRENCE AGGREGATE	$5,000,000 $5,000,000 $ $ $
C		WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) Y/N [ ] If yes, describe under SPECIAL PROVISIONS below	WCV6016485	12/13/09	12/13/10	[X] WC STATUTORY LIMITS [ ] OTHER E.L. EACH ACCIDENT E.L. DISEASE - EA EMPLOYEE E.L. DISEASE - POLICY LIMIT	 $1,000,000 $1,000,000 $1,000,000
B		OTHER POLLUTION & PROF	PEC596329402	12/13/09	12/13/10	Poll/Prof	5,000,000
B		POLLUTION LEGAL	PLC596408002	12/13/09	12/13/10	PollLegal	5,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES / EXCLUSIONS ADDED BY ENDORSEMENT / SPECIAL PROVISIONS

CERTIFICATE HOLDER

INFPU01

INFORMATIONAL PURPOSES ONLY

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING INSURER WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO DO SO SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE INSURER, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE