



The State of New Hampshire  
**DEPARTMENT OF ENVIRONMENTAL SERVICES**



**Thomas S. Burack, Commissioner**

April 4, 2011

Cindy J. Karlson, Attorney at Law  
Day Pitney LLP  
242 Trumbull Street  
Hartford, CT 06103

**Subject: Interim Hazardous Waste Transfer Facility Permit**

Dear Attorney Karlson:

The New Hampshire Department of Environmental Services, Waste Management Division (Department) has reviewed your request dated April 1, 2011, submitted on behalf of United Oil Recovery, Inc. ("United Oil") and Tradebe Environmental Services, LLC ("Tradebe"), for an Interim Permit for the United Oil Hazardous Waste Transfer Facility located in Newington NH. It is our understanding that the stock purchase transaction between United Oil and Tradebe is scheduled to occur on April 8, 2011.

On March 4, 2011, United Oil and Tradebe submitted an application to transfer Permit No. DES-HW-TF-2000-01. Due to the pending business disclosure investigation by the Attorney General's Office and the 30-day public comment period, the transfer of the Hazardous Waste Transfer Facility Permit will not take place before the scheduled stock purchase transaction. The issuance of this Interim Permit No. DES-HW-IP-TF-2000-01 will allow United Oil to operate the Hazardous Waste Transfer Facility after the transfer of ownership interest to Tradebe and prior to the Department's decision on the Hazardous Waste Transfer Facility permit application submitted to the Department.

Pursuant to RSA 147-A:4 V, the Department issues Interim Permit No. DES-HW-IP-TF-2000-01. This permit regulates transfer activities for consolidating and/or bulking hazardous waste in ten (10) days or less at the United Oil Hazardous Waste Transfer Facility. Interim Permit No. DES-HW-IP-TF-2000-01 is effective as of April 4, 2011 and is only valid by United Oil's compliance with all conditions of Hazardous Waste Transfer Facility Permit No. DES-HW-TF-2000-01 issued on April 6, 2000.

In accordance with RSA 147-A:4 IV-a, the applicant shall notify abutters of the request for a transfer of Hazardous Waste Transfer Facility Permit No. DES-HW-TF-2000-01. Once the Department has determined that the application is sufficiently complete the Department will proceed with a 30-day public comment period.

Following a review of the public comments on the application, the Department will determine whether a public hearing is warranted. A final decision on the permit transfer will occur

DES Web site: [www.des.nh.gov](http://www.des.nh.gov)

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following the Department's review of all public comments generated during the comment period and the hearing process, if held.

Should you have any questions regarding the application or the permitting process, please contact Linda R. Birmingham, Waste Management Engineer, or John J. Duclos, Administrator Hazardous Waste Management Bureau, at 271-2942.

Sincerely,



Michael J. Wimsatt, P.G., Director  
Waste Management Division

cc: United Oil Recovery, Inc. – Richard Baker, EHS Manager  
Newington Planning Board  
Board of Selectmen, Newington  
NHDOJ, Dan Licata  
DES PIP: T. Drew  
RCRA, DB  
UOR Permit file  
EPA Region I – S. Yee  
Sergio Nusimovich, CEO & President, Tradebe Environmental Services, LLC  
David Carabetta, President, United Oil Recovery, Inc

ec: Pamela Hoyt-Denison, P.E., Administrator, WMP  
John J. Duclos, Administrator, WMD-HWMB

Enclosure: Interim Permit No. DES-HW-IP-TF-2000-01



## INTERIM HAZARDOUS WASTE TRANSFER FACILITY PERMIT

as authorized by the  
NH Department of Environmental Services, Waste Management Division (Department)  
pursuant to RSA 147-A and Chapter Env-Hw 300 of the New Hampshire Hazardous Waste Rules (Rules)

**I. PERMIT/FACILITY IDENTIFICATION:**

**Permit No.:** DES-HW-IP-TF-2000-01

**EPA ID No.:** NHD980521843

**Permittee:** United Oil Recovery, Inc.

**Facility Name:** United Oil Recovery, Inc.

**Facility Type:** Hazardous Waste Transfer Facility

**Facility Location:** 410 Shattuck Way, Newington, NH 03801

**Facility Contact:** Rick Baker, EHS Manager

**Facility Description:** The facility is a Hazardous Waste Transfer Facility and is permitted to bulk, consolidate, or transfer hazardous wastes which are in a transit mode. The hazardous wastes are permitted to be transferred from vehicle to vehicle, or are permitted to be removed from a transport vehicle and temporarily stored for 10 days or less. This interim permit does not allow treatment or disposal of hazardous waste.

**II. FILE REFERENCE/RECORD OF APPLICATION:**

**Date(s) Received:** March 4, 2011; April 1, 2011.

**III TERMS AND CONDITIONS:** The permittee shall comply with the requirements of RSA 147-A, the New Hampshire Hazardous Waste Rules Env-Hw 100-1100 (Rules) and the terms and conditions of Hazardous Waste Transfer Facility Permit No. DES-HW-TF-2000-01 (attached). The issuance of an interim permit pursuant to RSA 147-A:4 V, will allow the Transfer Facility to operate after the closing date and prior to the Department's decision on the permit transfer from United Oil Recovery, Inc. as a transfer of ownership interest to Tradebe Environmental Services, LLC. The issuance of this interim permit will not cause danger to public health or safety.

**IV. EXPIRATION DATE:** In accordance with RSA 147-A:4 VI this interim permit will expire upon the Department's final decision on the transfer of Hazardous Waste Transfer Facility Permit No. DES-HW-TF-2000-01.

**V. AUTHORIZATION SIGNATURE:** Pursuant to RSA Chapter 147-A, this Interim Hazardous Waste Transfer Facility Permit is hereby issued to the Permittee as identified in Section I above to operate the hazardous waste transfer facility identified in Section I above, pursuant to the requirements of Section III above. Failure to comply with these terms and conditions could result in administrative, civil or criminal penalties, and suspension or revocation of the interim permit. No liability is incurred by the State of New Hampshire by reason of any approval of this hazardous waste transfer facility. Approval by the Department is based on plans and specifications supplied by the permittee. No warranty/guarantee is intended or implied by reason of any advice given by the Department or its staff.

This interim permit shall not eliminate the permittee's obligation to obtain all requisite federal, state or local permits, licenses or approvals, or to comply with all other applicable federal, state, district and local permits, ordinances, laws, approvals or conditions relating to the operation of the Hazardous Waste Transfer facility.

**BY EXERCISING ANY RIGHTS UNDER THIS AUTHORIZATION, THE PERMITTEE HAS AGREED TO ALL TERMS AND CONDITIONS OF THIS PERMIT.**

  
Michael J. Wimsatt, P.G., Director  
Waste Management Division

  
Date

