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"An Equal Opportunity Employer"

March 24, 2011

Wayne A. Wheeler
NH Department of Environmental Services
Solid Waste Management Bureau
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095

Dear Mr. Wheeler:

I am writing to respond to your letter of March 2, 2011 requesting additional information following United Oil Recovery, Inc.'s (UOR's) submission of several modifications to our Solid Waste Permit Application on Jan. 24, 2011. As requested, UOR is submitting three copies of our responses and attachments. As requested, revised dates have been included as needed. One revised page (page 3 of 19) from Section II of the Application form has also been submitted; (UOR has noted the revision date by hand on the bottom of these this page).

UOR will follow the Section and question numbers as presented in the letter.

A. Operating Plan

1. UOR has removed the word "solids" from the Prohibited Wastes list on page 4 of the Operating Plan. Since this language is also used on the Application form, UOR has revised page 3 of 19 on the form to remove the word "solids" from the Prohibited Wastes list (Item II-(6)).
2. Section 3, Table 1 Solid Waste Characterization & Verification Requirements has been modified for waste #5 construction and demolition debris under the second column. After the first bullet regarding completing the profile form, UOR has added language about a visual description. A third bullet has been added to include the requirement for potential asbestos analysis. Please note that because of pagination, the full table has been re-submitted.
3. Regarding specific sampling or analytical protocol as found in the regulations, what you are requesting is the basis for generators characterizing their waste as hazardous or not. There are no specific references for what samples/tests to run for specific types of waste in either the New Hampshire DES or EPA regulations. The general rules for making a hazardous waste determination on any type of waste can be found in the following section of the DES Hazardous Waste Rules:

- Env-Hw 502.01 Hazardous Waste Determination. This is the primary regulation for generators to characterize (determine) whether a waste is hazardous or non-hazardous. It references the sections in the regulations bulleted below.
- Env-Hw 402 Listed Hazardous Wastes (federal F,P,K, and U codes and applicable NH codes)
- Env-Hw 403 Characteristic Hazardous Wastes (federal D codes and applicable NH codes)
- Env-Hw 401.03 Exemptions (specific exemptions from being a hazardous waste have been referenced several times in the Operating Plan).
- Env-Hw 401.04 Hazardous Waste Determination Methods (this section presents an EPA reference to sampling and analytical methods)

Even with a full review of these sections, the regulations are not going to specify that a specific sample must be taken and test must be run. These determinations are up to the generator to decide and the regulatory agency to deem as appropriate. In Table 1 UOR has presented sampling and analytical protocol for wastes based on our knowledge and experience of managing wastes.

4. UOR is unsure as to what is being requested in this comment. Locations that authorized Waste #14 “Non-hazardous DOT Class 6, Division 6.1 poisonous materials assigned to Packing Group II or III” have been presented both in the Operating Plan (table on page 2) and on Figure SW-1. These locations are Solid Waste Areas 1-Front Operations Area A, 2-Rear of Dock, 5- Dock/Vehicles, and 6-Back Operations Area.
5. Section 3, Table 2 Solid Waste Disposal Facilities Used has been modified under item 3. The reference to the previous item was listed as #3 and should have been #2. This same error was made under items 11 and 15. It has been corrected under all three items. Also under item 3, the label “Metals reclamation” was listed under Maine Energy Recovery Company and should have been “Burned for energy recovery.” It has been corrected.
6. DES is correct that Devens Recycling Center, LLC is not a landfill but instead a construction and demolition debris recycler and transfer station for some other wastes. For this reason, UOR has completely removed Devens as a facility under items 3, 4, 7, 8, 9, and 10. UOR has modified the reference to Devens under items 5, 11, and 15. For these three items, Devens has been added to the primary column. Because of pagination changes, a fully revised copy has been submitted of Section 3, Table 2 Solid Waste Disposal Facilities Used.

B. Closure Plan

1. The RS Means data for a Professional Engineer’s services were gathered from actual data across the U.S. and represented a weekly and not an hourly rate. This data was from a 2003 publication. UOR requested a quote from New England Disposal Technologies, Inc. (NEDT). A new quote from NEDT with a significantly higher PE rate is attached.

2. UOR also requested a quote from NEDT for the two line items that UOR previously quoted based on our work experience:

- Decontamination of structures and surfaces by pressure washing; and
- Excavation of 50 cubic yards soil.

A new quote from NEDT to include these items is attached (note that one quote from NEDT covers #s 1 & 2).

UOR has revised Sections 9 and 10 (pages 8 and 9) of the Closure Plan to reflect these changes, including adjusting the closure cost estimate as applicable based on the new quotes.

Please contact me at (203) 238-8114 with any questions.

Sincerely,



Richard A. Baker

EHS Manager

UNITED OIL RECOVERY, INC.



Prohibited Wastes: The following are wastes prohibited to be received from off-site and processed, treated, stored, or transferred at UOR unless approved through another permit held by the facility, permittee, or operator or listed under “Authorized Wastes” above.

1. Hazardous wastes;
2. Septage which is defined as “material removed from septic tanks, cesspools, holding tanks, or other sewage treatment storage units, excluding sewage sludge from public treatment works and industrial waste and any other sludge” [from the New Hampshire Code, Title L Water Management and Protection, Chapter 485-A Water Pollution and Waste Disposal, Section 485-A:2 Definitions] unless under Authorized Waste # 3;
3. Sludge which is defined as “the solid or semisolid material produced by water and wastewater treatment processes, excluding domestic septage; provided, however, sludge which is disposed of at solid waste facilities permitted by the department shall be considered solid waste and regulated under RSA 149-M” [from the New Hampshire Code, Title L Water Management and Protection, Chapter 485-A Water Pollution and Waste Disposal, Section 485-A:2 Definitions] unless under Authorized Waste # 4;
4. Municipal Solid Waste (MSW);
5. DOT Class 1 Material (*Explosives and shock sensitive materials*);
6. DOT Class 2, Division 2.1 Material (*Flammable Gas*);
7. DOT Class 2, Division 2.2 Material (*Non-Flammable Gas*) unless under Authorized Waste #13;
8. DOT Class 2, Division 2.3 Material (*Gas Poisonous By Inhalation*);
9. DOT Class 4, Division 4.2 Material (*Spontaneously Combustible*);
10. DOT Class 4, Division 4.3 Material (*Dangerous When Wet Material*);
11. DOT Class 6, Division 6.1 Material (*Poisonous Material*) unless under Authorized Waste #14;
12. DOT Class 6, Division 6.2 Material (*Infectious Substances, Diagnostic Specimens, Biological Products, and Regulated Medical Waste*);
13. DOT Class 7 Material (Radioactive Material); and
14. Materials with a Health Hazard rating of 4, as defined in the National Fire Protection Association (NFPA) 704 “Standard Systems For the Identification Of the Fire Hazards of Materials” 2007 Edition or most recent version.

Section 3: Routine Operations Plan

Hours of Operation:

Most solid waste receipts, processing, treatment, and transfer operations occur between the hours of 6am and 6pm, Monday through Friday with occasional weekend hours (typically on-site activities only). There are occasional hours till 8pm. Emergency Response services are available 24 hours a day, 7 days a week.

Facility Access Control & On-Site Traffic Patterns

Figure NH-3 shows the route of traffic flow for the facility. The access route for all vehicles is via Shattuck Way through a manned gate at the entrance to the Sprague Energy (Sprague) facility. After checking in with the security personnel at the Sprague gate, the vehicles travel on

| | | | | | | | | | | | | | | | | | | | | | |
|-----|---|------|--|--|----|-------------|-----|--|------|----|-------------|-----|------------------------------------|------|----|----------------|-----|-------------------------------|------|----|--|
| (6) | <p>Type(s) of waste to be prohibited by the facility (be specific):</p> <p>Prohibited Wastes: The following are wastes prohibited to be received from off-site, processed, treated, stored, or transferred at UOR unless approved through another permit held by the facility, permittee, or operator or listed under "Authorized Wastes" above.</p> <ol style="list-style-type: none"> 1. Hazardous wastes; 2. Septage which is defined as "material removed from septic tanks, cesspools, holding tanks, or other sewage treatment storage units, excluding sewage sludge from public treatment works and industrial waste and any other sludge" [from the New Hampshire Code, Title L Water Management and Protection, Chapter 485-A Water Pollution and Waste Disposal, Section 485-A:2 Definitions] unless under Authorized Waste # 3; 3. Sludge which is defined as "the solid or semisolid material produced by water and wastewater treatment processes, excluding domestic septage; provided, however, sludge which is disposed of at solid waste facilities permitted by the department shall be considered solid waste and regulated under RSA 149-M" [from the New Hampshire Code, Title L Water Management and Protection, Chapter 485-A Water Pollution and Waste Disposal, Section 485-A:2 Definitions] unless under Authorized Waste # 4; 4. Municipal Solid Waste (MSW); 5. DOT Class 1 Material (Explosives and shock sensitive materials); 6. DOT Class 2, Division 2.1 Material (Flammable Gas); 7. DOT Class 2, Division 2.2 Material (Non-Flammable Gas) unless under Authorized Waste #13; 8. DOT Class 2, Division 2.3 Material (Gas Poisonous By Inhalation); 9. DOT Class 4, Division 4.2 Material (Spontaneously Combustible); 10. DOT Class 4, Division 4.3 Material (Dangerous When Wet Material); 11. DOT Class 6, Division 6.1 Material (Poisonous Material) unless under Authorized Waste #14; 12. DOT Class 6, Division 6.2 Material (Infectious Substances, Diagnostic Specimens, Biological Products, and Regulated Medical Waste); 13. DOT Class 7 Material (Radioactive Material); and 14. Materials with a Health Hazard rating of 4, as defined in the National Fire Protection Association (NFPA) 704 "Standard Systems For the Identification Of the Fire Hazards of Materials" 2007 Edition or most recent version. | | | | | | | | | | | | | | | | | | | | |
| (7) | <p>Type of residual waste to be produced by facility (be specific):</p> <p>United Oil Recovery, Inc.'s solid waste operations produce some residual wastes. Residues are produced from cleanout of the solidification processing units, cleanout of Tanks 3004 & 3005 for oily and non-oily wastewater, and cleanout of any vehicles or roll-offs/portable tank units that may be cleaned in the yard. Sludges and solids are managed by solidifying them in the processing units for staging/storage and eventual off-site shipment for treatment/disposal. Rinsewaters would be collected in a vacuum truck and either loaded into an on-site tank (i.e., Tank 3004 or 3005) or frac tank for storage and eventual off-site shipment for treatment. Another option is the vacuum truck would stage on-site prior to travelling off-site for treatment. For these on-site generated wastes, UOR would be considered a generator and subject to waste characterization and profiling as would any generator. UOR would follow the same procedures as presented for off-site generators in Section 3-Waste Acceptance and Rejection Procedures. The receiving facility would clearly dictate their needs in terms of profiling, sampling and analysis, quantities acceptable, etc. UOR generates these wastes infrequently based solely on the need to clean areas; therefore a volume of wastes generated is not presented in this plan. UOR currently sends residual wastewaters to one of its wastewater treatment plants in Massachusetts or Connecticut and residual solids to a landfill or trash-to-energy plant. Because of UOR's business in operating treatment/disposal facilities and in working directly with and processing multiple generators wastes, maintaining access to at least two authorized treatment/disposal locations (per Env-Sw-1105.10(b)) is not an issue. Please reference Section 4 in the Operating Plan entitled "Residual Waste Management Plan". Please also reference Table 2 in Section 3 of the Operating Plan for a list of treatment/disposal facilities used.</p> | | | | | | | | | | | | | | | | | | | | |
| (8) | <p>Capacity for each of the following:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%; text-align: center;">(a)</td> <td style="width: 65%;">Storing unprocessed/untreated waste: See Operating Plan Sections 1 & 3</td> <td style="width: 10%; text-align: center;">tons</td> <td style="width: 10%; text-align: center;">or</td> <td style="width: 10%; text-align: center;">cubic yards</td> </tr> <tr> <td style="text-align: center;">(b)</td> <td>Storing processed/treated waste: See Operating Plan Sections 1 & 3</td> <td style="text-align: center;">tons</td> <td style="text-align: center;">or</td> <td style="text-align: center;">cubic yards</td> </tr> <tr> <td style="text-align: center;">(c)</td> <td>Storing waste-derived products: NA</td> <td style="text-align: center;">tons</td> <td style="text-align: center;">or</td> <td style="text-align: center;">NA cubic yards</td> </tr> <tr> <td style="text-align: center;">(d)</td> <td>Processing/treatment rate: NA</td> <td style="text-align: center;">tons</td> <td style="text-align: center;">or</td> <td style="text-align: center;">NA cubic yards per day on average annually</td> </tr> </table> | (a) | Storing unprocessed/untreated waste: See Operating Plan Sections 1 & 3 | tons | or | cubic yards | (b) | Storing processed/treated waste: See Operating Plan Sections 1 & 3 | tons | or | cubic yards | (c) | Storing waste-derived products: NA | tons | or | NA cubic yards | (d) | Processing/treatment rate: NA | tons | or | NA cubic yards per day on average annually |
| (a) | Storing unprocessed/untreated waste: See Operating Plan Sections 1 & 3 | tons | or | cubic yards | | | | | | | | | | | | | | | | | |
| (b) | Storing processed/treated waste: See Operating Plan Sections 1 & 3 | tons | or | cubic yards | | | | | | | | | | | | | | | | | |
| (c) | Storing waste-derived products: NA | tons | or | NA cubic yards | | | | | | | | | | | | | | | | | |
| (d) | Processing/treatment rate: NA | tons | or | NA cubic yards per day on average annually | | | | | | | | | | | | | | | | | |
| (9) | <p>Identify other waste management activities at the site. Check all of the below which apply. If none apply, check here <input type="checkbox"/> and go to Section III.</p> <p>You must respond to this question to fulfill the reporting requirements in Env-Sw 1105.07(d) and (f). However, the information provided by your response shall not become part of any permit issued pursuant to this application; it is merely intended to identify whether other types of waste management activities, not covered by the requested permit, are or will be conducted at the subject site.</p> <p>Therefore, if any of the below listed activities are or will be occurring at this site, place a check mark in the corresponding box and show the location of each such activity on the site plans prepared pursuant to Section VI of this form. Also, be certain the activities do not adversely affect the ability to properly manage the facility for which a permit is being sought.</p> <p>Also note: Although the below listed activities do not require issuance of a solid waste management facility permit, other local, state or federal permits or approvals may apply. Contact the DES Public Information & Permitting Office [(603) 271-2975], if necessary, for assistance in determining permitting requirements.</p> | | | | | | | | | | | | | | | | | | | | |

rev. 3/24/11

Section 3

Table 1

Solid Waste Characterization & Verification Requirements

Table 1
Solid Waste Characterization & Verification Requirements
United Oil Recovery, Inc.
Newington, NH

| Authorized Waste | Initial Waste Characterization Analytical & Other Requirements | Waste Verification Analytical & Other Requirements |
|---|--|--|
| <p>1. Non-terne-plated hot-drained used oil filters</p> | <ul style="list-style-type: none"> • Complete profile form only; profile should assure that hot-drain process occurs at generator site | <p>Visual only on the received filters to assure that physical/other description on profile matches and that hot-drain process has occurred. Recovered liquid oil in the pit shall be tested each time it is pumped out/processed for:</p> <ul style="list-style-type: none"> • Halogens* • Flash point • PCBs • % phases (oil, rag, water, sediment/solids) <p>* Solvent scan if halogens \geq 1,000 ppm</p> |
| <p>2. Non-hazardous oily (oil must be \leq 5% to meet this waste category) and non-oily wastewater.</p> <p>Note that wastes with oil layers > 5% would be managed as waste/used oils.</p> | <ul style="list-style-type: none"> • Complete profile form • % phases (oil, rag, water, sediment/solids) <p><u>Oil Layer (if present)</u>¹</p> <ul style="list-style-type: none"> • Halogens (at least 5% oil needed to run test)* • Flash point • PCBs • Oil metals (As, Cd, Cr, Pb) <p>* Solvent scan if halogens \geq 1,000 ppm</p> | <p>Visual to assure that physical/other description on profile matches</p> <ul style="list-style-type: none"> • % phases (oil, rag, water, sediment/solids) <p><u>Oil Layer (if present)</u></p> <ul style="list-style-type: none"> • Halogens (at least 5% oil needed to run test)* • Flash point • PCBs <p>* Solvent scan if halogens \geq 1,000 ppm</p> |

| Authorized Waste | Initial Waste Characterization Analytical & Other Requirements | Waste Verification Analytical & Other Requirements |
|--|--|--|
| 2. Non-hazardous oily (oil must be ≤ 5% to meet this waste category) and non-oily wastewater (cont.) | <u>Aqueous Layer</u> <ul style="list-style-type: none"> • pH • RCRA metals | <u>Aqueous Layer</u> <ul style="list-style-type: none"> • pH |
| 3. Contaminated septic wastewater (contaminated with oil or other non-hazardous solid wastes not usually found in septic wastewater) | <ul style="list-style-type: none"> • Complete profile form • % phases (oil, rag, water, sediment/solids) <u>Contaminant Layer</u> ¹ <ul style="list-style-type: none"> • Halogens (at least 5% oil needed to run test) • Flash point • PCBs • RCRA VOCs if suspected (e.g., halogens are detected or contaminants are fuels, paint related materials, or solvents) • Oil metals (As, Cd, Cr, Pb) if managing as a used oil | <p>Visual to assure that physical/other description on profile matches</p> <ul style="list-style-type: none"> • % phases (oil, rag, water, sediment/solids) <u>Contaminant Layer</u> <ul style="list-style-type: none"> • Halogens (at least 5% oil needed to run test) • Flash point • PCBs • RCRA VOCs if suspected (e.g., halogens are detected or contaminants are fuels, paint related materials, or solvents) |
| 4. Industrial wastewater treatment plant sludge (not municipal sludge from POTWs) | <ul style="list-style-type: none"> • Complete profile form • % phases (water, sediment/solids) • TCLP metals • TCLP organics | <p>Visual to assure that physical/other description on profile matches</p> <ul style="list-style-type: none"> • % phases (water, sediment/solids) |
| 5. Construction and demolition debris | <ul style="list-style-type: none"> • Complete profile form, which includes visual description • Possibly TCLP for constituents of concern based on point of generation (metals and/or organics may be needed) • Possibly asbestos analysis | <p>Visual only to assure that physical/other description on profile matches</p> |

| Authorized Waste | Initial Waste Characterization Analytical & Other Requirements | Waste Verification Analytical & Other Requirements |
|---|--|---|
| 5. Construction and demolition debris (cont.) | based on type of debris and point of generation | |
| 6. Asbestos as regulated under Env-Sw 901 | <ul style="list-style-type: none"> • Complete "asbestos" profile form | Visual to assure that physical/other description on profile matches. Visual will also assure that packaging material is adequate, not ripped or leaking, labeled properly, etc. |
| 7. Ash as regulated under Env-Sw 902 | <ul style="list-style-type: none"> • Complete profile form • PCBs • % phases (water, sediment/solids) • TCLP metals (if ash type is not listed as an exempt hazardous waste per Env-Hw 401.03(b)(4) or 401.03(b)(23)) | Visual to assure that physical/other description on profile matches <ul style="list-style-type: none"> • PCBs • % phases (water, sediment/solids) |
| 8. Contaminated soils and media as regulated under Env-Sw 903 | <ul style="list-style-type: none"> • Complete profile form • PCBs • % phases (water, sediment/solids) • TCLP metals & organics (if waste is not listed as an exempt hazardous waste per Env-Hw 401.03(b)(17),(18),(19), or (21)) | Visual to assure that physical/other description on profile matches <ul style="list-style-type: none"> • PCBs • % phases (water, sediment/solids) |
| 9. Over the counter and prescription pharmaceuticals generated by consumers, pharmacies, and factories (may be no longer needed or expired) that are also non-controlled substances | <ul style="list-style-type: none"> • Complete profile form which will include checking labels, spec sheets, MSDSs, etc. • Unknowns will be classified at customer site and may include analytical testing based on the chemist/technician's judgment | Visual only to assure that physical/other description on profile matches |

| Authorized Waste | Initial Waste Characterization Analytical & Other Requirements | Waste Verification Analytical & Other Requirements |
|---|---|---|
| 10. Non-TSCA PCB contaminated solid wastes | <ul style="list-style-type: none"> • Complete profile form • PCBs (on solids) • TCLP metals • TCLP organics • % phases (oil, water, sediment/solids) <p><u>Oil Layer (if present)</u></p> <ul style="list-style-type: none"> • Halogens (at least 5% oil needed to run test)* • Flash point • PCBs • Oil metals (As, Cd, Cr, Pb) if managing as a used oil <p>* If managing this layer as a used oil, perform solvent scan if halogens \geq 1,000 ppm</p> | <p>Visual to assure that physical/other description on profile matches</p> <ul style="list-style-type: none"> • PCBs (on solids) • % phases (oil, water, sediment/solids) <p><u>Oil Layer (if present)</u></p> <ul style="list-style-type: none"> • Halogens (at least 5% oil needed to run test) • Flash point • PCBs <p>* If managing this layer as a used oil, perform solvent scan if halogens \geq 1,000 ppm</p> |
| 11. Household non-hazardous wastes | None. Households are not required to characterize their wastes. A profile form would likely be completed by the municipality or their contractor at the collection site. | <p>Visual to assure that physical/other description on profile matches</p> <ul style="list-style-type: none"> • PCBs (for oil contaminated material or when suspected) • % phases (oil, water, sediment/solids) • pH (for aqueous materials) • Flash point (for fuels, paint-related materials, solvents) • Halogens (if a liquid oil layer is present) |
| 12. Empty used drums/containers (metal, plastic, other) and expended fire extinguishers | None | <p>Visual to assure that physical/other description on profile matches; specifically checking that the drums/containers or fire extinguishers are empty</p> |

| Authorized Waste | Initial Waste Characterization Analytical & Other Requirements | Waste Verification Analytical & Other Requirements |
|--|---|--|
| 13. Non-hazardous aerosols and other compressed gases (these waste gases may be classified as DOT Class 2, Division 2.2 (non-flammable)) | <ul style="list-style-type: none"> Complete profile form which will include checking labels, spec sheets, MSDSs, etc. | Visual only to assure that physical/other description on profile matches |
| 14. Non-hazardous DOT Class 6, Division 6.1 poisonous materials assigned to Packing Group II or III | <ul style="list-style-type: none"> Complete profile form which will include checking labels, spec sheets, MSDSs, etc. | Visual only to assure that physical/other description on profile matches |
| 15. Non-hazardous non-infectious waste from medical facilities | <ul style="list-style-type: none"> Complete profile form Tests as required when waste falls into specific category listed in 1-14 above | Visual to assure that physical/other description on profile matches; specifically checking that waste is not saturated with blood, bodily fluids, or other visually potentially infectious materials. <ul style="list-style-type: none"> Tests as required when waste falls into specific category listed in 1-14 above |
| 16. Scrap plastic and metal (drums/containers, tanks, other) | Not required | Visual only to assure that plastic and metal contains no waste or virgin material. |

¹ For # 2 & 3, initial waste characterization analysis may be skipped if contaminant is virgin #2, #4, #6 fuel oil or virgin diesel fuel.

United Oil Recovery, Inc. Staff Involved in Approving & Accepting Wastes

| | Plant Manager | Profiling Manager (CT) | Yard Manager | Shipping/ Receiving Office | Sales Reps |
|---------------------------------------|--------------------------|-----------------------------------|-------------------------|---|---|
| Initial Waste Characterization | ✓ | ✓ | If needed | ✓ | ✓ |
| Waste Verification | ✓ | | ✓ | ✓ | Only as needed during discrepancies or rejections |

The UOR Plant Manager has the ultimate responsibility for approving or rejecting wastes into UOR.

Section 3

Table 2

Solid Waste Disposal Facilities Used

Table 2
Solid Waste Disposal Facilities Used
United Oil Recovery, Inc.
Newington, NH

| Authorized Waste | Primary Disposal Facility & Processing/Disposal Method | Other Disposal Facilities & Processing/Disposal Method |
|--|---|--|
| 1. Non-terne-plated hot-drained used oil filters | Maine Energy Recovery Company (MERC) 3 Lincoln Street Biddeford, ME 04005 Metals reclamation | New England Waste Services of Vermont, Inc. Airport Road Newport, VT 05855 Landfill Vortex Recycling 61 Riverpark Drive New Castle, PA 16101 Filter recycling |
| 2. Non-hazardous oily (oil must be \leq 5% to meet this waste category) and non-oily wastewater. Note that wastes with oil layers > 5% would be managed as waste/used oils. | Environmental Compliance Corporation * 441R Canton Street Stoughton, MA 02072 Wastewater treatment and oils recovery/recycling | United Oil Recovery, Inc. * 136 Gracey Avenue Meriden, CT 06451 Bridgeport United Recycling, Inc. * 50 Cross Street Bridgeport, CT 06610 Both wastewater treatment and oils recovery/recycling |
| 3. Contaminated septic wastewater (contaminated with oil or other non-hazardous solid wastes not usually found in septic wastewater) | <u>Liquids</u> : same as #2 above | <u>Liquids</u> : same as #2 above |

| Authorized Waste | Primary Disposal Facility & Processing/Disposal Method | Other Disposal Facilities & Processing/Disposal Method |
|---|--|---|
| <p>3. Contaminated septic wastewater (contaminated with oil or other non-hazardous solid wastes not usually found in septic wastewater) (cont.)</p> | <p><u>Solids with BTU value (e.g., oil contaminated)</u> Maine Energy Recovery Company (MERC) 3 Lincoln Street Biddeford, ME 04005</p> <p>Burned for energy recovery</p> <p><u>Solids with no BTU value</u> New England Waste Services of Vermont, Inc. Airport Road Newport, VT 05855</p> <p>Landfill</p> | <p><u>Solids with no BTU value</u> Turnkey Recycling and Environmental Enterprises 90 Rochester Neck Road P.O. Box 7065 Rochester NH 03839</p> <p>Interstate Waste Services Moretown Landfill 19 Kaiser Drive Waterbury, VT 05671</p> <p>Mt. Carberry Landfill 80 Hutchins St Berlin, NH 03570</p> <p>All of the above are landfills</p> |
| <p>4. Industrial wastewater treatment plant sludge (not municipal sludge from POTWs)</p> | <p>New England Waste Services of Vermont, Inc. Airport Road Newport, VT 05855</p> <p>Landfill</p> | <p>Turnkey Recycling and Environmental Enterprises 90 Rochester Neck Road P.O. Box 7065 Rochester NH 03839</p> <p>Interstate Waste Services Moretown Landfill 19 Kaiser Drive Waterbury, VT 05671</p> <p>Mt. Carberry Landfill 80 Hutchins St Berlin, NH 03570</p> <p>All of the above are landfills</p> |

| Authorized Waste | Primary Disposal Facility & Processing/Disposal Method | Other Disposal Facilities & Processing/Disposal Method |
|---|---|--|
| 5. Construction and demolition debris | <p>Devens Recycling Center, LLC 45 Independence Drive Devens, MA 01434</p> <p>C&D Recycling</p> <p>OR</p> <p>Environmental Resource Return Corp. (ERRCO) 270 Exeter Road Epping, NH 03042</p> <p>Landfill</p> | <p>New England Waste Services of Vermont, Inc. Airport Road Newport, VT 05855</p> <p>Turnkey Recycling and Environmental Enterprises 90 Rochester Neck Road P.O. Box 7065 Rochester NH 03839</p> <p>Interstate Waste Services Moretown Landfill 19 Kaiser Drive Waterbury, VT 05671</p> <p>Mt. Carberry Landfill 80 Hutchins St Berlin, NH 03570</p> <p>All of the above are landfills</p> |
| 6. Asbestos as regulated under Env-Sw 901 | <p>Turnkey Recycling and Environmental Enterprises 90 Rochester Neck Road P.O. Box 7065 Rochester NH 03839</p> <p>Landfill</p> | <p>Crossroads Landfill and Transfer Station 357 Mercer Road P.O. Box 629 Norridgewock, Maine 04957</p> <p>Ontario County Landfill 1879 Rt. 5&20 Stanley, NY 14561</p> <p>Both of the above are landfills</p> |

| Authorized Waste | Primary Disposal Facility & Processing/Disposal Method | Other Disposal Facilities & Processing/Disposal Method |
|---|--|--|
| 7. Ash as regulated under Env-Sw 902 | <p>New England Waste Services of Vermont, Inc. Airport Road Newport, VT 05855</p> <p>Landfill</p> | <p>Turnkey Recycling and Environmental Enterprises 90 Rochester Neck Road P.O. Box 7065 Rochester NH 03839</p> <p>Interstate Waste Services Moretown Landfill 19 Kaiser Drive Waterbury, VT 05671</p> <p>Mt. Carberry Landfill 80 Hutchins St Berlin, NH 03570</p> <p>All of the above are landfills</p> |
| 8. Contaminated soils and media as regulated under Env-Sw 903 | <p>New England Waste Services of Vermont, Inc. Airport Road Newport, VT 05855</p> <p>Landfill</p> <p><u>Petroleum Contaminated Soils</u> Environmental Soil Management, Inc. (ESMI) 67 International Drive Loudon, New Hampshire 03307 & Phoenix Soil LLC 130 Freight Street Waterbury, CT 06702-1817</p> | <p>Turnkey Recycling and Environmental Enterprises 90 Rochester Neck Road P.O. Box 7065 Rochester NH 03839</p> <p>Interstate Waste Services Moretown Landfill 19 Kaiser Drive Waterbury, VT 05671</p> <p>Mt. Carberry Landfill 80 Hutchins St Berlin, NH 03570</p> <p>All of the above are landfills</p> |

| Authorized Waste | Primary Disposal Facility & Processing/Disposal Method | Other Disposal Facilities & Processing/Disposal Method |
|---|--|--|
| 8. Contaminated soils and media as regulated under Env-Sw 903 (cont.) | Both above are soil reclamation facilities using thermal treatment to reclaim soils | |
| 9. Over the counter and prescription pharmaceuticals generated by consumers, pharmacies, and factories (may be no longer needed or expired) that are also non-controlled substances | <p>Maine Energy Recovery Company (MERC) 3 Lincoln Street Biddeford, ME 04005</p> <p>Burned for energy recovery</p> | <p>New England Waste Services of Vermont, Inc. Airport Road Newport, VT 05855</p> <p>Turnkey Recycling and Environmental Enterprises 90 Rochester Neck Road P.O. Box 7065 Rochester NH 03839</p> <p>Interstate Waste Services Moretown Landfill 19 Kaiser Drive Waterbury, VT 05671</p> <p>Mt. Carberry Landfill 80 Hutchins St Berlin, NH 03570</p> <p>All of the above are landfills</p> |
| 10. Non-TSCA PCB contaminated solid wastes | <p>Maine Energy Recovery Company (MERC) 3 Lincoln Street Biddeford, ME 04005</p> <p>Burned for energy recovery</p> | <p>New England Waste Services of Vermont, Inc. Airport Road Newport, VT 05855</p> <p>Turnkey Recycling and Environmental Enterprises 90 Rochester Neck Road P.O. Box 7065 Rochester NH 03839</p> |

| Authorized Waste | Primary Disposal Facility & Processing/Disposal Method | Other Disposal Facilities & Processing/Disposal Method |
|--|---|---|
| 10. Non-TSCA PCB contaminated solid wastes (cont.) | | <p>Interstate Waste Services Moretown Landfill 19 Kaiser Drive Waterbury, VT 05671</p> <p>Mt. Carberry Landfill 80 Hutchins St Berlin, NH 03570</p> <p>All of the above are landfills</p> |
| 11. Household non-hazardous wastes | <p><u>Liquids: same as #2 above</u></p> <p><u>Solids with BTU value (e.g., oil contaminated)</u> Maine Energy Recovery Company (MERC) 3 Lincoln Street Biddeford, ME 04005</p> <p>Burned for energy recovery</p> <p><u>C&D Solids for Recycling</u> Devens Recycling Center, LLC 45 Independence Drive Devens, MA 01434</p> <p>C&D Recycling</p> <p><u>Solids with no BTU value to Landfill</u> New England Waste Services of Vermont, Inc. Airport Road Newport, VT 05855</p> | <p><u>Liquids: same as #2 above</u></p> <p><u>Solids with no BTU value</u> Turnkey Recycling and Environmental Enterprises 90 Rochester Neck Road P.O. Box 7065 Rochester NH 03839</p> <p>Interstate Waste Services Moretown Landfill 19 Kaiser Drive Waterbury, VT 05671</p> <p>Mt. Carberry Landfill 80 Hutchins St Berlin, NH 03570</p> <p>All of the above are landfills</p> |

| Authorized Waste | Primary Disposal Facility & Processing/Disposal Method | Other Disposal Facilities & Processing/Disposal Method |
|---|--|---|
| <p>12. Empty used drums/containers (metal, plastic, other) and expended fire extinguishers</p> | <p>ENCO Industries, Inc. 4 Wilder Dr. #7 Plaistow, NH 03865</p> <p>Send drums/containers out for refurbishing or recycle/scrap based on condition</p> | <p>Berwick Iron & Metal Recycling 106 Route 236 Berwick, ME 03901</p> <p>Metal recycling</p> <p>New England Barrel Company, Inc. 326 Old Maple Avenue North Haven, CT</p> <p>Refurbishes or recycles/scraps drums/containers based on condition</p> |
| <p>13. Non-hazardous aerosols and other compressed gases (these waste gases may be classified as DOT Class 2, Division 2.2 (non-flammable))</p> | <p><u>Oxygen Cylinders</u> CEMCO 130 York St Auburn, NY 13021</p> <p>Recovers the gas for re-use and recycles the steel container</p> <p><u>Aerosols & Other Cylinders</u> Giant Resource Recovery 755 Industrial Road, Sumter, SC 29150</p> <p>Fuel blending & incineration</p> | <p>Heritage-WTI, Inc. 1250 Saint George Street East Liverpool, OH 43920</p> <p>SET Environmental, Inc. 5738 Cheswood Street Houston, TX 77087</p> <p>Both fuel blending & incineration</p> |
| <p>14. Non-hazardous DOT Class 6, Division 6.1 poisonous materials assigned to Packing Group II or III</p> | <p>Dependant on type of poison and whether a liquid or a solid. Generally, solids would follow the landfill list like #4 above (not repeated here). Liquids would go to either of United's CT facilities for fuel blending and shipment out for incineration:</p> | <p>See response in column to left</p> |

| Authorized Waste | Primary Disposal Facility & Processing/Disposal Method | Other Disposal Facilities & Processing/Disposal Method |
|---|--|--|
| 14. Non-hazardous DOT Class 6, Division 6.1 poisonous materials assigned to Packing Group II or III (cont.) | United Oil Recovery, Inc. * 136 Gracey Avenue Meriden, CT 06451 Bridgeport United Recycling, Inc. * 50 Cross Street Bridgeport, CT 06610 | |
| 15. Non-hazardous non-infectious waste from medical facilities | <u>Liquids: same as #2 above</u> <u>Solids with BTU value (e.g., oil contaminated)</u> Maine Energy Recovery Company (MERC) 3 Lincoln Street Biddeford, ME 04005 Burned for energy recovery <u>C&D Solids for Recycling</u> Devens Recycling Center, LLC 45 Independence Drive Devens, MA 01434 C&D Recycling <u>Solids with no BTU value to Landfill</u> New England Waste Services of Vermont, Inc. Airport Road Newport, VT 05855 | <u>Liquids: same as #2 above</u> <u>Solids with no BTU value</u> Turnkey Recycling and Environmental Enterprises 90 Rochester Neck Road P.O. Box 7065 Rochester NH 03839 Interstate Waste Services Moretown Landfill 19 Kaiser Drive Waterbury, VT 05671 Mt. Carberry Landfill 80 Hutchins St Berlin, NH 03570 All of the above are landfills |

| Authorized Waste | Primary Disposal Facility & Processing/Disposal Method | Other Disposal Facilities & Processing/Disposal Method |
|--|--|--|
| 16. Scrap plastic and metal (drums/containers, tanks, other) | ENCO Industries, Inc. 4 Wilder Dr. #7 Plaistow, NH 03865 Send drums/containers out for refurbishing or recycle/scrap based on condition | Berwick Iron & Metal Recycling 106 Route 236 Berwick, ME 03901 Metal recycling New England Barrel Company, Inc. 326 Old Maple Avenue North Haven, CT Refurbishes or recycles/scraps drums/containers based on condition |

* United Oil Recovery, Inc. owned and operated facility.

NOTE ON OVERALL TABLE: The above list is not exhaustive or exclusive. United Oil Recovery, Inc. (UOR) may ship the listed wastes both to listed facilities other than the primary and non-listed facilities. UOR provides this list as part of the permitting process and is not obligated to keep it up to date as an ongoing permit condition.

Section 9: Closure Cost Estimate

| TASK | UNIT PRICE | TOTAL COST |
|---|------------------------------------|--------------------|
| Transportation and disposal of 154 cubic yards of non-hazardous solid waste from the two full processing units; (at 17,000 pounds/30 cubic yards, equates to 43.6 tons) | \$90 per ton | \$3,924.00 |
| Transportation and disposal of 300 cubic yards of non-hazardous solid waste from the staging/storage areas; (at 15 tons/30 cubic yard roll-off, equates to 150 tons) | \$90 per ton | \$13,500.00 |
| Transportation and disposal of 74,100 gallons of non-hazardous oily wastewater from Tanks 3004 & 3005 (assumes tanks are full with 95% liquid & 5% sludge). | \$0.40 per gallon | \$29,640.00 |
| Transportation and disposal of 3,900 gallons of non-hazardous oily wastewater from Tanks 3004 & 3005 (assumes tanks are full with 95% liquid & 5% sludge). 3,900 gallons equates to 29.25 tons. | \$90 per ton | \$2,632.50 |
| Decontamination of structures and surfaces by pressure washing | \$10,000 | \$10,000.00 |
| Analysis (characterization), transportation, and treatment/disposal of 1,500 gallons of non-hazardous rinsewater | \$0.40 per gallon | \$600.00 |
| Concrete inspection (Loading/Offloading Area), Processing Units surface inspection, soil borings, and soil sampling (assumes 20 samples collected & 5 hours total labor) | \$25 per hour | \$125.00 |
| Excavation of 50 cubic yards soil (equates to 25 tons) | \$1,200 | \$1,200.00 |
| Analysis (characterization), transportation, and disposal of 25 tons contaminated soil (assume hazardous) | \$215 per ton | \$5,375.00 |
| Inspection and certification by a Professional Engineer (assume 40 hours) | \$3,000 | \$3,000.00 |
| | SUBTOTAL | \$69,996.50 |
| | 10% unforeseen contingency cost | \$6,999.65 |
| | TOTAL CLOSURE COST ESTIMATE | \$76,996.15 |

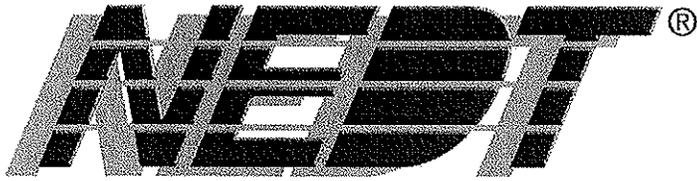
Note that since the Dock and the Back Operations Area are "shared" areas with Hazardous Waste permitted operations, that the full volume of the Dock (38,720 gallons) and the volume of hazardous waste allowed in the Back Operations Area (300 cubic yards) were assumed to be hazardous waste. Therefore, in the Solid Waste Closure Plan, the volume of solid waste staged at the Dock was assumed to be zero and only the difference of wastes allowed in the Back Operations Area was estimated above (600 cubic yards total permitted solid waste less 300 cubic yards permitted hazardous waste = 300 cubic yards used in above estimation).

Decontamination of the Dock surface is also covered in the Hazardous Waste Closure Plan. Soil sampling, excavation, transportation, and disposal of the Dock and Back Operations Area are also covered in the Hazardous Waste Closure Plan.

Section 10: Sources for Closure Cost Estimate Unit Prices

Provided in the table below are the tasks and unit prices used in Section 9. A third column has been substituted to indicate the source for the unit prices. Following this table and attached to the Closure Plan are the third party quotes and price sheets. The two entities that provided this information were a waste broker headquartered in New York state who has been in the waste business for over 25 years (Waste Technology Services or WTS, Inc.) and the text by publisher RS Means entitled "Environmental Remediation Cost Data-Unit Price" for use in estimating prices for environmental work. The cost data for this text was established based on over eight years of researching environmental projects/facilities from across the United States. Finally, UOR utilized its own experience in estimating two of the tasks that it specializes in performing in its field work (decontamination of surfaces by pressure washing and soil excavation).

| TASK | UNIT PRICE | SOURCE |
|---|-------------------|---------------------|
| Transportation and disposal of 154 cubic yards of non-hazardous solid waste from the two full processing units; (at 17,000 pounds/30 cubic yards, equates to 43.6 tons) | \$90 per ton | WTS quote |
| Transportation and disposal of 300 cubic yards of non-hazardous solid waste from the staging/storage areas; (at 15 tons/30 cubic yard roll-off, equates to 150 tons) | \$90 per ton | WTS quote |
| Transportation and disposal of 74,100 gallons of non-hazardous oily wastewater from Tanks 3004 & 3005 (assumes tanks are full with 95% liquid & 5% sludge). | \$0.40 per gallon | WTS quote |
| Transportation and disposal of 3,900 gallons of non-hazardous oily wastewater from Tanks 3004 & 3005 (assumes tanks are full with 95% liquid & 5% sludge). 3,900 gallons equates to 29.25 tons. | \$90 per ton | WTS quote |
| Decontamination of structures and surfaces by pressure washing | \$10,000 | NEDT quote |
| Analysis (characterization), transportation, and treatment/disposal of 1,500 gallons of non-hazardous rinsewater | \$0.40 per gallon | WTS quote |
| Concrete inspection (Loading/Offloading Area), Processing Units surface inspection, soil borings, and soil sampling (assumes 20 samples collected & 5 hours total labor) | \$25 per hour | RS Means cost sheet |
| Excavation of 50 cubic yards soil (equates to 25 tons) | \$1,200 | NEDT quote |
| Analysis (characterization), transportation, and disposal of 25 tons contaminated soil (assume hazardous) | \$215 per ton | WTS quote |
| Inspection and certification by a Professional Engineer (assume 40 hours) | \$3,000 | NEDT quote |



NEW ENGLAND DISPOSAL TECHNOLOGIES, INC.

March 23, 2011

United Oil Recovery, Inc.

47 Gracey Avenue
Meriden, CT 06451
Attn: Rick Baker

Dear Mr. Baker,

I am writing to provide you a cost estimate for the following jobs to be performed at your Newington, NH facility.

1. Confined space entry tank cleaning and decontamination of two 39,000 gallon each horizontal above-ground storage tanks (previously holding oily and non-oily wastewater). Surface cleaning of one concrete off-loading pad (approximately 5,500 square feet) and two in-ground processing units (previously holding oily solids/debris; totaling approximately 154 cubic yards).
2. Excavation of approximately 50 cubic yards of contaminated soil.
3. Professional Engineer oversight of your Solid Waste closure activities (estimated at 40 hours).

| Activity | Cost Estimate |
|---|---------------|
| 1. CSE tank cleanings and surface cleaning of pad/processing units (pressure washing) | \$10,000 |
| 2. Excavation of 50 CY soil | \$1,200 |
| 3. Professional Engineer review of Closure Plan and work oversight | \$3,000 |

I am providing this cost estimate based on the information you forwarded to me in your Solid Waste Closure Plan dated 1/21/11. Please feel free to contact me at (508) 234-4440 if you have any questions.

Sincerely,

New England Disposal Technologies, Inc.

A handwritten signature in cursive script that reads "Michael J. Robertson".

Michael J. Robertson
General Manager

www.NEDTinc.com

83 GILMORE DRIVE · SUTTON, MASSACHUSETTS 01590 · TEL: 508 / 234-4440 · FAX: 508 / 234-4441

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