

**United Oil Recovery, Inc.
Solid Waste Operating Plan
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United Oil Recovery, Inc. Solid Waste Operating Plan

Introduction

Section VII of the Solid Waste Processing/Treatment Facility Application requires an Operating Plan in accordance with the requirements specified in the application and Env-Sw 1105.11. The Solid Waste regulatory requirements found in Env-Sw-500 are most applicable since the facility is a processing and treatment facility, however Env-Sw-400 also applies because a portion of the solid waste received at the site does not need processing and can simply be staged/stored prior to trans-shipment to an off-site disposal facility. Env-Sw-900 also applies because UOR proposes in this Application to accept and process some of the categories listed as “certain wastes” including asbestos, ash, and contaminated soils/media.

Section 1: Facility Identification

Facility Identification:

United Oil Recovery, Inc.
410 Shattuck Way
Newington, NH 03801
Rockingham county
Phone #s: (800) 345-4525 or (603) 431-2420
Fax #: (603) 431-3806
Acronym: UOR

Temporary Permit #: DES-SW-TP-97-018

Facility Type: Solid waste processing, treatment, storage, and transfer facility. Note that UOR also holds a hazardous waste transfer permit from NH DES and performs used oil, universal waste, and virgin product storage/handling activities (the latter currently performed by a third party) on-site.

Capacity of the Facility: The facility’s non-hazardous processing unit or mix pit is designed in 2 sections of equal dimensions. Based on their dimensions, each section can each hold up to 77 cubic yards or 154 cubic yards in total. Weight will vary depending on the density of the waste in the pit. UOR may store/stage up to 600-cubic yards in roll-offs or other portable tank units (e.g., frac tanks, vacuum boxes). This equates to a maximum of 20 full 30 cubic yard containers (or equivalent smaller containers to get to the 600 yard capacity). UOR may store/stage up to 38,720 gallons of solid waste in any combination of different size non-bulk and intermediate bulk containers on-site. The weight of such containers will vary based on the density of the waste/product stored. UOR may store up to 78,000 gallons oily and non-oily wastewater or used oil in Tanks 3004 & 3005. Each tank has a capacity of 39,000 gallons. The facility also stages/stores solidification material (e.g., pionite dust, sawdust) and scrap metal and empty containers (metal, plastic, other) for refurbishing/re-use. These are currently stored in Front Operations Area B (Area #8). There is no maximum storage capacities associated with these

materials. United Oil Recovery, Inc. has prepared the following table to show capacity/storage limits and locations stored on-site.

| Solid Waste (Waste # from Authorized Wastes list in Section 2) | Maximum Storage Capacity | Storage Container | Location(s) ** Area #s from Figure SW-1 |
|---|-------------------------------------|--|---|
| Oily and non-oily non-hazardous waste/debris (1,3,4,7,8,10,11,12,15) | 154 cubic yards | Two 77 cubic yard sections in the solid waste processing units | Solid Waste Processing Units (Area #3) |
| Any approved solid waste (1-16) | 600 cubic yards | Roll-offs or other portable tank units (e.g., frac tanks, vacuum boxes) of varying sizes | Front Operations Area A (Area #1), Back Operations Area (Area #6), or Hazardous Waste Transfer Dock (Area #s 2 & 5) |
| Any approved solid waste (1-16) | 38,720 gallons * | Non-bulk and intermediate bulk containers of varying sizes | Front Operations Area A (Area #1), Back Operations Area (Area #6), or Hazardous Waste Transfer Dock (Area #s 2 & 5) |
| Oily and non-oily wastewater (2,3) | 78,000 gallons | One of two 39,000 gallons tanks | Tanks 3004 & 3005 (Area #4) |

* When the hazardous waste storage dock is used, the full volume of hazardous and solid waste stored in trailers at the dock shall not exceed 38,720 gallons.

** The Back Operations Area may also be used to store up to 10 hazardous waste roll-offs or other portable tank units.

Facility Service Type: UOR services generators of wastes and products that need to process, treat, and/or dispose of them in an environmentally sound manner.

Facility Service Area: UOR primarily services generators from New England and New York, but on occasion may serve a generator from outside of this region.

Permittee & Operator Identification: Same as listed in Facility Identification above.

Property Owner Identification:

Sprague Energy
Two International Drive, Suite 200
Portsmouth, NH 03801
Phone #: (800) 225-1560 or (603) 431-1000

Section 2: Authorized and Prohibited Waste

Authorized Wastes: The following are solid wastes authorized to be received from off-site and processed, treated, and transferred at UOR. When an exemption from the New Hampshire Hazardous Waste Rules applies it is noted below.

1. Non-terne-plated hot-drained used oil filters (hazardous waste exemption found at Env-Hw 401.03 (b)(10))
2. Non-hazardous oily and non-oily wastewater (hazardous waste exemption for oily wastewater with $\leq 5\%$ oil found at Env-Hw 401.03 (b)(16)b; there is no specific exemption for non-oily wastewater)
3. Contaminated septic wastewater (contaminated with oil or other non-hazardous solid wastes not usually found in septic wastewater)
4. Industrial wastewater treatment plant sludge (not municipal sludge from POTWs)
5. Construction and demolition debris
6. Asbestos as regulated under Env-Sw 901 of the New Hampshire DES Solid Waste Rules
7. Ash as regulated under Env-Sw 902 of the New Hampshire DES Solid Waste Rules
8. Contaminated soils and media as regulated under Env-Sw 903 of the New Hampshire DES Solid Waste Rules
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
10. Non-TSCA PCB contaminated solid wastes
11. Household non-hazardous wastes (household hazardous wastes would be acceptable under the hazardous waste transfer permit)
12. Empty used drums/containers (metal, plastic, other) and expended fire extinguishers
13. Non-hazardous aerosols and other compressed gases (these waste gases may be classified as DOT Class 2, Division 2.2 (non-flammable))
14. Non-hazardous DOT Class 6, Division 6.1 poisonous materials assigned to Packing Group II or III
15. Non-hazardous non-infectious waste from medical facilities;
16. Scrap plastic and metal (drums/containers, tanks, other). Hazardous waste exemption for scrap metal found at Env-Hw 401.03 (a)(9).

Note that all the waste streams listed above must be non-hazardous wastes before they can qualify as an authorized solid waste.

Prohibited Wastes: The following are solids 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

controlled (non-public) roads to the border of the UOR facility. Vehicles accessing UOR then proceed to the facility.

As described elsewhere in this application, the facility does not operate transport vehicles, so information on specific vehicles and their capacities is not presented here. United Industrial Services, a division of UOR, does operate transport vehicles that use the facility, as do other third party waste transporters. Vehicles loading and off-loading solid wastes account for approximately 10-15 vehicles per day. The UOR facility is also accessed by hazardous waste vehicles (associated mainly with the transfer dock), vehicles associated with the used oil portion of the business, vehicles delivering virgin products, and the vehicles of vendors and employees.

Waste Acceptance and Rejection Procedures

Throughout this discussion, please reference Table 1 - Solid Waste Characterization & Verification Requirements and the three Solid Waste Process Flow Charts (which include acceptance and rejection procedures).

Profiling

United Oil Recovery, Inc. runs its solid waste operations at a facility that is also permitted for the 10 day transfer of hazardous waste. UOR performs its waste acceptance or rejection for solids wastes in the same manner as it does for hazardous wastes. An approval of solid waste for the facility is based on a waste characterization process. This process includes the completion of a profile form. A blank profile form is included as Attachment 1; (although the attached is UOR's form, other profile forms are acceptable as well). The profile form provides UOR with essential information regarding the generator and their waste stream. The waste profile form is signed and dated by the generator to certify its accuracy. Information to characterize the waste stream (i.e., determine whether or not it is hazardous or non-hazardous waste, assign appropriate federal or state waste codes, and assign proper DOT shipping information if required) can include laboratory analysis, MSDSs or product specification sheets, and generator process knowledge of the waste stream (e.g., when this data is not provided or when MSDS and generator knowledge is not adequate). Some of the waste streams that UOR handles may ultimately be land disposed, so it is important to determine if waste meets the regulatory land disposal restrictions. There are times when a sample and laboratory analysis is required to determine the status of a waste stream. UOR can provide this service for a waste generator. Once a solid waste is approved for acceptance into UOR, it is assigned an approval code and entered into UOR's database. This unique approval code will reference the profiling information that was developed for the waste stream. Generators are requested to re-certify each waste stream (approval code) profiled into UOR on an annual basis.

Asbestos-Specific Profile Forms

United Oil Recovery, Inc. will offer to contractors and generators partially completed asbestos specific profiles to aid in the initial waste characterization of this waste stream. A separate profile form for both friable and non-friable asbestos will be offered. The reasons for this are: first, contractors and generators who are involved with removal of this waste stream are likely not familiar with waste profile forms; second, much of the waste stream information that would be gathered for a specific asbestos profile will be similar to another asbestos profile; and third, since only a completed profile is required to initially characterize asbestos a partially completed

form would allow contractors/generators to deliver asbestos to the facility and complete the form on-site while delivering the waste. Therefore, much of the waste stream information can be pre-completed making the approval process quicker and easier. Information can still be added to the waste stream information if needed or desired. UOR will still request generator and contractor specific information (name, address, etc.) and require an authorized party to sign the form indicating the form representative.

Waste Analysis

Waste analysis is performed to determine if incoming wastes are acceptable in accordance with the facility's permits and technical capabilities. There are two categories of tests to be performed on incoming wastes.

1. Initial Waste Characterization (for waste streams proposed or initially to be accepted);
and
2. Waste Acceptance Verification (for waste streams being delivered to the facility).

The categories are described in more detail below.

Initial Waste Characterization

New wastes from a generator that are proposed to be accepted at the facility will have an initial characterization analysis. The only exception to this is the virgin materials (see "Generic Profiles" above). UOR will obtain a completed generator Waste Profile Form (Attachment 1), or equivalent, from the generator. As part of profiling the waste stream, the generator may supply an analysis of the waste stream and/or a representative sample, before it is accepted at the facility. The purpose of the Waste Profile Form is to obtain information about chemicals and processes used by the generator in order to determine potential constituents of concern in the generator's wastes and to define appropriate storage and treatment requirements.

Unless enough information can be obtained from the profile and supplementary information (e.g., MSDSs, previous analytical results), a sample of the generator's waste is provided with the generator's Waste Profile Form. UOR reviews the profile and supplementary information to determine if additional parameters beyond the acceptance profile are required for the initial sample. Results of the review are recorded on each Waste Profile Form. All initial samples are tested for constituents and parameters delineated on Table 1 (middle column). If analysis is provided by the generator to characterize the waste stream for UOR, it must include the constituents and parameters delineated in Table 1 (middle column). Any deficiencies in the supplied analysis will be completed by UOR using a representative sample provided by the generator.

Once complete, the laboratory results are reviewed and a comparison is made to the criteria in Table 1 (middle column) and State and Federal hazardous waste regulations to determine whether the waste can be accepted as a solid waste at UOR, and if so, under what category of waste.

Note that the New Hampshire hazardous waste rules list several exemptions where materials either are not considered hazardous wastes or are exempt from regulation as a hazardous waste. These exemptions may be used in characterizing a waste for acceptance as a solid waste into the

facility. The exemptions are found at Env-Hw 401.03. References to specific exemptions have been cited throughout the Operating Plan.

Generators are required to submit a new Waste Profile Form whenever the process generating the waste changes (including using different materials in the process), or whenever the waste acceptance verification indicates that the waste stream has changed. At a minimum, the facility will obtain an annual certification from the generator that the waste stream has not changed and remains as described on the profile. This is typically done through a letter to the generator.

Waste Acceptance Verification

Incoming solid wastes are subject to a verification process prior to acceptance. This process will include a review of the shipping paper to assure that the material to be received was shipped on a proper shipping document, with a proper shipping name, the quantity shipped and units, and other information. Other information reviewed on the shipping paper includes the presence of signatures, dates, EPA ID #s, and generator address and phone numbers. Shipping papers that may be used include a non-hazardous waste manifest, a bill-of-lading, or on occasion a hazardous waste manifest (this occurs typically when the generating state requires a manifest for a non-hazardous waste). UOR staff is trained on the use of shipping papers that accompany a waste stream. For receipt of solid waste both the Yard Manager and receiving office review the shipping paper.

Upon arrival at the site the waste stream itself is physically reviewed to assure that it meets its profiled parameters. Where containers are involved, they are unloaded from their vehicle(s), staged, counted, and visually inspected for their condition and proper markings. Bulk trucks are similarly inspected. Weights or volumes are reviewed. The waste itself is visually checked to assure that it matches what it was profiled for. A sample of the waste is then taken and analyzed per Table 1 (last column). The purpose of the waste verification analysis is to detect contaminants in the waste or any unusual or unexpected properties of a waste shipment. If there are no discrepancies and the waste verification analysis is acceptable, the facility signs the shipping paper accepting the shipment. The waste stream is then offloaded for on-site processing, treatment, or storage.

For waste streams to be offloaded either to Tanks 3004 or 3005 or the Processing Units (pits), the waste verification analytical is performed prior to placing the waste in these tanks or units. In this way a waste that does not meet initial visual or analytical requirements for acceptance does not enter a processing area. For materials to be placed in the Processing Unit, a rejection based on visual may still occur following analytical acceptance and placement in the units; (e.g., an unacceptable waste at the bottom of a container not visible until offloading). For all other waste streams not to be immediately processed (therefore staged or stored) a different procedure may be used. It may take anywhere from one hour to two business days to complete the verification analysis for acceptance. The reason for this is availability in the lab, other samples in the queue, waste arrival on-site late in the day or prior to a weekend, etc. It is unreasonable to hold a truck until a full waste verification analytical is complete and the shipping paper is accepted and signed. Instead, the facility will unload the waste in its original container and perform a shipping paper verification only. This consists of a drum/container count, quantity review, label review, and overall shipping paper review. If all information is acceptable, or if there is a paper discrepancy which is resolved, a copy of the shipping paper is provided to the

driver and the wastes are staged on-site. Samples are taken and run per Table 1 (last column). The shipment is received into the facility only after the full analytical verification is complete and acceptable. Then the shipping paper is signed as received and the wastes may be processed or simply continue to be staged/stored on-site. If the shipment is rejected, the wastes are either returned to the generator or shipped to an alternate facility (in their original shipping containers unless those were a cause for the rejection and re-packaging occurred).

Compositing of samples may be performed when multiple containers of the same waste is to be received. This is done only with intermediate bulk and non-bulk containers. A composite sample can be made by taking a small portion of each drum in the waste stream shipment to fill a sample jar. The sampling technician shall use his judgment in determining how many drums/containers shall be composited per sample jar. The sample jar would then be tested as specified in Table 1 (last column). Each drum/container may still be sampled separately and run for specific parameters only. This is typically done for constituents such as PCBs. It will be the Plant Manager's decision on whether or not to composite a waste stream shipped with multiple drums/containers.

Discrepancies & Rejections

If a waste stream does not meet its profiled parameters or was improperly shipped, UOR will take steps to rectify the situation. In the case of incorrect information on the shipping paper and a waste stream that is still acceptable for receipt at the facility, UOR will typically work out the required changes with the generator and transporter (and waste broker if involved). If a hazardous waste manifest is involved, formal procedures and sometimes a discrepancy report may be needed. If a waste stream was incorrectly shipped to the facility or is found to be unrepresentative of the way in which it was profiled, UOR will work with the generator (and waste broker if involved) to determine if the waste stream is still a candidate for solid waste processing, treatment, storage, or transfer from the facility. If it is determined not to be a candidate for the solid waste program at UOR, UOR will work with the generator (and/or broker) to determine what steps to take from there. The waste may still be received at the facility, but as a hazardous waste for processing through the 10 day transfer program. In some cases, the waste will not be a candidate for the facility at all and will need to be rejected. Rejection can be back to the generator's site or to an alternate facility. The original shipping paper is marked "rejected" with new shipping instructions. The shipment is either returned to the generator or sent to an alternate facility with the original shipping paper. In all of the above cases, the generator ultimately has to decide on how to process their waste stream.

The following are examples of discrepancies.

1. Variation in quantity (volume or weight) and/or units;
2. Incorrect number of drums/containers versus what is listed on the shipping paper; and
3. Waste description or waste code on shipping paper does not match waste material (visually or analytically).

Paperwork for discrepancies and rejections (shipping paper with discrepancy noted or copy of rejected shipping paper with rejected to location noted) will be filed on-site. The Receiving Office is responsible for this task.

Staff Involved in Approving & Accepting Wastes

The initial waste characterization (profiling) process is managed for UOR as a corporate entity by a Profiling Manager (based in Connecticut). The Newington Plant Manger, Shipping/Receiving Office, and Sales Representatives work closely with this individual to coordinate profiling of waste bound for the NH facility. The Sales Representatives are the staff who visit customer sites and gather much of the information needed as well as viewing the waste generation process and taking samples at the point of generation. For waste verification, the staff involved is strictly on-site individuals. These include the Plant Manager, Yard Manager, and Shipping/Receiving Office. The Sales Representatives will typically only be involved if a discrepancy is discovered where a waste stream needs to be altered to be accepted or needs to be rejected. The Sales Rep would typically be the individual contacting the generator (or their broker) to discuss the situation and alternatives. Provided at the bottom of Table 1 is a summary of the staff involved in both waste characterization and verification.

Incoming and Outgoing Waste Tracking

United Oil Recovery, Inc. tracks incoming and outgoing wastes through a combination of computer and hard-copy records. UOR operates a database system whereby inbound, outbound, and oil transfer reports can be run for a requested time period. The information in the database is based on the inbound or outbound shipping paper. Hard copies are kept of the shipping papers. Quantity, generator (or source for incoming), and destination facilities (for outgoing) are three key elements of the information that is tracked. The Shipping/Receiving Office holds the main responsibility for waste tracking. They rely on information from both the Yard and Plant Manager regarding processing on-site. Examples of inventory tracking reports are presented in Attachment 2. The examples include Inbound Bulk Loads, Inbound Drum/Container Loads, Outbound Loads, and Oil Transfers. For the Solid Waste permit, the last log would only be a reference for recovered oil transfers from Tanks 3004 & 3005 to the on-site Safety-Kleen tanks.

Storage Time and Capacity Limits

UOR will actively manage all solid wastes pursuant to the Solid Waste regulatory requirements of Env-Sw 102.03. Upon receipt, UOR identifies the type of waste by referencing its unique approval code and written description on the incoming shipping paper. The approval code will reference the waste's profiled information as well as shipping history. This information is available through UOR's computer system as well as through hard copy files. Labeling of incoming waste will typically be done at the generator site. The most common type of labels that will be on solid waste non bulk, intermediate bulk, and large containers such as roll-offs will be a non-hazardous waste (green) label or non-RCRA regulated (blue) label. Both these labels identify the waste generator information. If a label is not present upon arrival on-site, UOR will place an appropriate label on the container. Bulk liquid vehicles such as vacuum and tank trucks will be placarded for DOT purposes but will not contain waste labels, nor do they need to since vehicles such as these will not be stored on-site like containers will. Note that Tanks 3004 & 3005 are both labeled "Used Oil for Recycle" per the NH DES used oil rules. Solid wastes that will be processed, treated, stored, or transferred from the UOR facility are not putrescible and therefore there are no specific time limits for the storage of these materials. UOR will store or stage wastes to ensure that capacity limits are met at all times and in a manner that minimizes the risk of releases or accidents during storage/staging.

UOR shall abide by the following capacity limits for its solid waste facility.

Processing units (pits): The non-hazardous processing units (pits) are designed in 2 sections of equal dimensions. Based on their dimensions, each section can each hold up to 77 cubic yards or 154 cubic yards in total. Weight allowed will vary depending on the density of the waste in the pit. Practically, the pits will be managed in a manner such that overflow will not occur when materials are loaded, staged, and processed. Operators will assure that enough freeboard is maintained to allow for the addition of the solidification agent or additional solid waste.

Staging/storage in on-site roll-offs or other portable tank units: Between the Back Operations Area (Solid Waste Area #6), the Hazardous and Solid Waste Transfer Dock (Solid Waste Area #5), the Rear of Dock (Solid Waste Area #2), and the Front Operations Area A (Solid Waste Area #1), UOR has room to stage or store up to 600 cubic yards in roll-offs or other portable tank units (e.g., frac tanks, vacuum boxes). Average size of roll-offs are 30 cubic yards, but they can vary based on the event they were used for. For maximum capacity limits, UOR will not exceed 600 cubic yards in any combination of different size roll-offs or other portable tank units. For example, 30 full 20 cubic yard roll-offs are acceptable and the maximum limit. Note that this capacity does not include roll-offs and other portable tank units stored as part of the hazardous waste operations, although the Back Operations Area (shared storage area) can only stage/store a maximum combination of hazardous and/or solid wastes totaling 300 cubic yards.

Staging/storage in non-bulk containers and intermediate bulk containers: UOR has the ability to accept solids wastes in DOT and non-DOT containers. Containers are defined (by DOT) as units having a capacity of 119 gallons or less. Intermediate bulk containers (IBCs) are used for materials greater than 119 gallons and UOR can accept these as well. For solids these are typically cubic yard boxes and T-packs, but may also be totes. UOR may stage/store such containers in the same locations identified above for roll-offs or other portable tank units, although they are typically received via box truck or bulk trailer for immediate processing on-site versus storage. If storage/staging was needed, UOR will typically leave these containers in a trailer or truck to minimize exposure and the potential for accidental release. UOR has room to stage or store up to 704 containers and intermediate bulk containers. This is the capacity of 8 trailers at the dock each holding 88 containers maximum; (although staging/storage may occur in other locations besides the dock as indicated above). Note that the average container size is 55 gallons although smaller containers are handled as well (e.g., 30 gallon, 15 gallon, 5 gallon pails). IBCs are defined (by DOT) as being greater than 119 gallons; average size IBCs handled at UOR are 250-300 gallons. For maximum capacity purposes, UOR may stage/store up to 38,720 gallons of solid waste in any combination of different size non-bulk and intermediate bulk containers on-site. Note that the weight of such containers will vary based on the density of the waste/product stored. For maximum capacity limits, UOR will not exceed 38,720 gallons of solid waste in any combination of different size non-bulk containers and IBCs. For example, 500 full 55-gallon drums and 374 full 30-gallon drums are acceptable and the maximum limit. Note that this capacity does not include non-bulk containers and IBCs stored as part of the hazardous waste operations, although if solid wastes are stored on trailers at the dock, the maximum combined capacity of 38,720 gallons shall not be exceeded.

Storage of oily and non-oily wastewater or used oil in Tanks 3004 & 3005

UOR may store up to 78,000 gallons oily and non-oily wastewater or used oil in Tanks 3004 & 3005. Each tank has a capacity of 39,000 gallons.

UOR assures compliance with maximum quantities and locations for staging/storage by inspecting the facility (see Section 5) and through inventory tracking (discussed above).

Solid Waste Processing, Treatment, Bulking/Consolidation, Storage/Staging, and Transfer Procedures

UOR has provided Solid Waste Process Flow Charts (which include acceptance/rejection procedures) for three types of waste processing:

- Wastes Placed in Processing Units
- Liquids to Tanks 3004 & 3005
- On-Site Storage

One waste stream may have portions that undergo more than one of these processes. The three flow charts are presented at the end of Section 3.

General Operating Procedures

The following general operating procedures are followed for loading, unloading, bulking/consolidation, treatment (solidification), processing, storage/staging, and transfer of solid waste. Note that some of these procedures are specific to liquids and slurries that are pumpable and some are specific to solids and semi-solids that are not pumpable. Specific operating procedures per type of authorized waste are presented later in this section.

- Only trained and certified operators are permitted to process solid waste at United Oil Recovery, Inc. Certification is achieved through the state of New Hampshire program for solid waste operators.
- During processing and transfer, operators must be in constant attendance.
- The following precautions are taken to prevent spills:
 - The volume of product in the truck or container to be loaded/offloaded and available capacity are verified by the operator overseeing the operation.
 - Spill containment and cleanup material and emergency communications are available.
 - Wastes are loaded/offloaded in areas provided with spill containment.
 - UOR will follow its Contingency Plan (Section 6) for emergency response including spills.
- The identity of the product in containers or vehicles is confirmed prior to processing.
- Identity, quantity, and qualitative composition of product are checked against the shipping document and work order. These documents are revised if a correction is required.

- For drums or other containers, the quantity of drums/containers for each waste stream is verified against the shipping paper.
- Shipping paper to actual volume or disposition discrepancies are brought to the attention of the Plant Manager and handled accordingly.
- For containers, the conditions of the container and label are evaluated during unloading or transfer. Problems are corrected or brought to the attention of the Plant Manager.
- Personal protective equipment (PPE) for all waste processing operations shall be Level D minimally to include:
 - Work clothes
 - Safety glasses
 - Steel toe boots/shoes
 - Work gloves

An equivalent or higher level of PPE may be substituted for the above at the operator's or Plant Manager's discretion. A tyvek suit may be worn to prevent clothes from becoming soiled at the operator's discretion or if required by the Plant Manager. It is not anticipated that a higher level of PPE will be required for processing any of the solid waste authorized on-site. Other PPE such as chemical-resistant gloves, booties, and suits, respirators/cartridges, and goggles are available for use if needed.

General Loading/Unloading Procedures (may be done with any authorized solid waste)

Note that spill prevention procedures as outlined in the third bullet under *General Operating Procedures* above are also used for all loading/unloading operations.

Transfer by Pressure Unload - Bulk Solid

Used for transfer from vacuum trucks to other bulk trucks. Hose is connected to vehicle to be unloaded. Hose is either connected to the bottom valve of vehicle to be loaded using the same procedure or put into the dome cover or over the top in the case of a roll-off container or other portable tank unit. Valve of the receiving vehicle is opened if applicable. Valve of unloading vehicle is opened and transfer occurs. Hose is removed from product of receiving vehicle if applicable or valve of receiving vehicle is closed and valve connection cracked. Vacuum is applied to hose by unloading vehicle to empty hose. Hoses are disconnected and capped as previously described. Dome cover is secured, if applicable. Examples of wastes processed in this manner are liquids including oily and non-oily wastewater and solids including oil contaminated soils/debris.

Transfer by Vacuum Unload - Bulk Solid

Used for transfer to vacuum vehicles from other bulk vehicles. Hose is connected to vehicle to be loaded. Hose is either connected to the bottom valve of vehicle to be unloaded using the same procedure, or put into the dome cover or over the top in the case of a roll-off container or other

portable tank unit. Appropriate vacuum is achieved in the receiving vehicle. Valve of receiving vehicle is opened, if applicable. Valve of unloading vehicle is opened and transfer occurs. Hose is removed from tank of unloaded vehicle, if applicable, or valve of unloaded vehicle is closed and valve connection cracked. Vacuum is applied to hose by loading vehicle to empty hose. Hoses are disconnected and capped as previously described. Dome cover is secured, if applicable. Examples of wastes processed in this manner are liquids including oily and non-oily wastewater and solids including oil contaminated soils/debris.

Transfer - Small Containers to Larger Containers

Solids wastes received in small quantity containers will be opened by hand to be transferred from their small packaging to a larger container, such as a drum. This operation will be conducted in a secure area such that containment and safety can be maximized. Personnel performing this operation shall take precautions including wearing the proper personal protective equipment (see last bullet under *General Operating Procedures* above) to ensure that the operation is performed in a safe and environmentally sound manner. Examples of wastes processed in this manner are small volume containers of liquid or solid wastes.

Transfer and Consolidation of Waste Solids between Roll-Offs or Other Portable Tank Units

Solid wastes to be transferred between roll-offs or other portable tank units are done in a secure processing area. Roll-offs or other portable tank units are parked close to each other for ease of processing. Roll-offs or other portable tank units are inspected for integrity prior to processing. Items checked include closed, sealed, and locked doors and covers. If the roll-off to be loaded into is empty and the material to be loaded into it requires one, a liner is placed on the roll-off interior. Processing may involve using heavy equipment such as a backhoe or front-end loader. When processing is complete, tarps are placed on the roll-off(s) that contain waste and the roll-off(s) or other portable tank units are moved to another area of the facility for storage prior to transport off-site. Examples of wastes processed in this manner are large volume solids including oil contaminated soils/debris, construction and demolition waste, asbestos, ash, and sludge phases of non-hazardous solids.

Transfer of Sealed Drums or Other Containers from Truck to Truck

Alternative Number 1: Use of the Loading Dock: Truck to be unloaded is backed up to the loading dock and drums/containers are moved by drum dolly, forklift or other suitable equipment out of the unloading truck onto the dock. Loading truck is backed up to the dock and drums are loaded by moving the drum dolly, forklift or other suitable equipment onto the loading truck. When loading vehicles for staging at dock, DOT compatibility requirements of hazardous materials are followed.

Alternative Number 2: Trucks are backed up back-to-back and transfer is made using the drum dolly, forklift or other suitable equipment directly from the unloading truck to the loading truck.

Solid Waste Movement to Staging/Storage Areas

Solid wastes are delivered directly to the on-site area where they will be staged/stored (and possibly treated/processed or transferred off-site at a later time).

Solidification in Processing Units (Pits)

This procedure is used for solids with liquid content that will eventually be shipped off-site for either energy recovery or landfill disposal. Such materials include oily debris and wet sand or soil. Third party facilities require minimal moisture content to process these wastes. UOR eliminates moisture content by placing these wastes in the processing unit (or pit) and adding a solidification agent (such as pionite dust or sawdust). The solidification agent is mixed with the waste until the liquids are absorbed and an acceptable moisture content is attained. Heavy equipment such as a back hoe is used to perform the mixing. When complete, the solidified mixture is transferred to a roll-off (or other container) and staged/stored on-site until arrangements are made to transfer the material to a third party treatment/disposal facility. Note that solidification may also be performed directly in a roll-off container or dump truck if done in a safe and secure manner. This is not standard practice and should only occur if the pits are out of service for maintenance or another reason.

Staging/Storage of On-Site Containers (Roll-Offs, Frac Tanks, Vacuum Boxes and other Portable Tank Units, Non-Bulk and Intermediate Bulk Containers)

As presented earlier in this section, the staging and storage of materials is a key component of UOR's solid waste operations. Staging/storage areas include the Back Operations Area in the northern section of the site, the Hazardous Waste Transfer Dock and its paved entry and staging areas in the central portion of the site, the active operations area in the eastern portion of the site, and the unpaved land adjacent (west) of the hazardous waste dock (labeled Front Operations Area A on the figures). UOR shall stage/store solids wastes in these areas by transporting the container holding the waste to the area and locating it in a safe and secure manner. While being staged/stored, the waste container is subject to site inspections to assure that there are no releases or conditions that can lead to a release. Wastes stored in roll-offs are tarped when staged/stored in areas that are not covered. Wastes stored in other containers are kept sealed to prevent releases and the infiltration of precipitation.

Staging/Storage of Solidification Material

As discussed earlier, solidification material/agents are used in the processing units (pits) or roll-offs to solidify material with moisture/liquids content. Solidification agents (such as pionite dust and sawdust) are either stored in roll-offs or other containers on-site or directly on the ground.

Processing Procedures Specific to Authorized Solid Waste Streams

Authorized Solid Waste #1: Oil Filter Management in Processing Units (Pits)

Non-terne-plated hot-drained used oil filters are received by UOR to be managed in the processing units (pits). The generators of such filters must perform hot draining as required by regulations to drain oil from the filters prior to UOR receiving them on-site. If they are not hot drained, they are hazardous waste (NH Code NH01) and cannot be received by UOR under its Solid Waste permit; (they may be received as NH01 under the Hazardous Waste Transfer permit but may not be processed in the pits). The hazardous waste regulatory exemption for non-terne-plated hot-drained used oil filters is Env-Hw 401.03 (b)(10). The filters are loaded into the pit. They are allowed to further drain so that residual oil can be recovered. Recovered oil is pumped from the pit to one of the on-site tanks (either Tank 3004 or 3005) for storage, processing, and eventual recycling as a used oil. The drained filters are turned with heavy equipment to aid in the draining process. UOR must pump the liquid contents of the pit by the end of each operating

day. Pumps used are either a vacuum truck pump (portable) or the stationary pump located in the pump house adjacent to the Loading/Offloading Pad (Solid Waste Area #7). Filters removed from the pit are placed in a roll-off (or other containers) and staged on-site until they are shipped off-site for recycling/disposal. They may also be placed from the pit directly on a truck for immediate off-site shipment. Note that oil filters may also be received in sealed containers for storage on-site and eventual transfer off-site without processing in the pits. This is not a common occurrence.

Authorized Solid Waste #2: Oily and Non-Oily Wastewater

Oily and non-oily wastewater is received on-site to be stored either in Tank 3004 or 3005. It is received typically in bulk trucks, but may be received in containers as well. The bulk trucks arrive on-site and stage on the Loading/Offloading Pad (Solid Waste Area #7) or adjacent to it if there is a queue. Containers can be staged in any of the acceptable areas on-site. Once acceptable, the oily and non-oily wastewater is offloaded into one of the tanks. This is done in the following manner. The truck would back into a spot on the Loading/Offloading Pad. Directly adjacent to the Loading/Offloading Pad is the indoor pumphouse. A hose(s) are hooked up from the truck to the offloading line and an on/off switch controls the pump that delivers the waste to the chosen tank. The Yard Manager would only have to manually open certain valves to direct the waste to the correct tank. The two tanks are both manually gauged twice each day to determine their level heights (i.e., how much product they contain). They each have high level alarms that would audibly alert an operator when 90% height is reached. Once the product is in the tank, the only processing that will occur is separation of oil from water (if necessary) and movement of material into the tanks and between the tanks. Oil is recovered for recycling by first separating it from the aqueous phase. This is achieved in one of three ways. The first is gravity separation. If allowed to settle over time, lighter phased materials (oil) will settle out and rise to the top of the mixture. Second and third, heat (through a heat exchanger currently) or a demulsifier can be used to assist in the separation. Once separated from the aqueous phase, the recovered oils can be pumped to a truck or container for shipment off-site as a recycled fuel. A container may remain on-site in storage until arrangements are made to ship it off-site. The wastewater similarly gets pumped to a truck to be sent off-site for wastewater treatment. Please see Table 2 for facilities UOR ships to for these materials (currently facilities all owned and operated by UOR). If oily wastewater arrives on-site and is found to be >5% oil (through Waste Verification Analysis-see above) then the full waste stream is managed as a used oil through the NH DES Hazardous Waste Rules. Processing that occurs is exactly the same, but the waste itself is simply classified differently. Should an oily or non-oily wastewater be found to be a hazardous waste (through Waste Verification Analytical), it will follow the procedures for "Discrepancies & Rejections" and either be handled as a 10 day hazardous waste for transfer, or be rejected off-site to a hazardous waste facility. Note that oily and non-oily wastewater may also be received in sealed containers for storage on-site and eventual transfer off-site without processing through the tanks. This is not a common occurrence. Also note that Safety-Kleen currently operates part of the facility for used oil processing. Currently Tanks 3001, 3002, and 3003 are used for this purpose. Recovered oils from Tanks 3004 & 3005 are currently pumped to one of the Safety-Kleen operated tanks. This would be the equivalent of shipping it off-site to a used oil facility since at that point it would be managed by a third party.

Authorized Solid Wastes #3 & 4: Contaminated Septic Wastewater and Industrial Wastewater Treatment Plant Sludge

UOR may receive, solidify (if needed), and stage/store contaminated septic wastewater and industrial wastewater treatment plant sludge (filter cake) on-site. UOR shall follow the same procedures presented above under “Solidification in Processing Units (Pits)” and “Staging/Storage of On-Site Containers” for the management of these wastes on-site.

Contaminated septic wastewater is typically received to be processed as presented above under “Oily and Non-Oily Wastewater”. UOR is not in the business of pumping or receiving septic waste solids (like septic haulers would generate and ship direct to a POTW). UOR is involved when contamination occurs to a septic tank. Examples include oil or paint inadvertently pumped or discharged into a septic tank. The liquid or slurry generated is not acceptable to POTWs because they cannot handle the oil or paint contamination. At times these wastes are more solid than liquid. In these instances, UOR would solidify them in the processing units and stage/store them on-site until arrangements are made to ship them to an off-site treatment/disposal facility. Wastewater treatment plant sludges typically need solidification prior to shipment to an off-site disposal facility (most often a landfill).

Authorized Solid Waste #5: Construction and Demolition Debris Receipt, Bulking, Staging/Storage, and Transfer

UOR may receive, bulk/consolidate (if needed), and stage/store construction and demolition debris/waste on-site. Specific construction and demolition debris that UOR anticipates handling includes wood, bricks, concrete, metal and plastic piping, metal (e.g., steel, iron, aluminum) building products and parts (including beams and siding), roofing shingles and tar, sheetrock and wallboard, and other building materials/products associated with construction. These include both interior and exterior materials. The regulatory definition found at Env-Sw 102.42 for “Construction and demolition debris” is consistent with what UOR anticipates handling. The sources of these waste streams include construction and demolition professionals as well as UOR’s own Field Services Division. Debris may be from the residential, commercial, or industrial sectors. UOR shall follow the same procedures presented above under “Staging/Storage of On-Site Containers” for the management of these wastes on-site.

Authorized Solid Waste #6: Asbestos Receipt, Staging/Storage, and Transfer

United Oil Recovery, Inc. works with licensed asbestos abatement contractors, municipalities, and potentially homeowners to provide a staging and transfer location for asbestos generated in removal and clean-up work. UOR follows the requirements presented in the New Hampshire Solid Waste Rules Env-Sw-901 for the management of asbestos/asbestos waste, whether it is friable or not. UOR shall assure that asbestos wastes are managed to prevent the release of asbestos fibers to the environment. This may entail assuring that asbestos contractors possess the proper license to perform their work and assuring that friable asbestos is received in proper bag(s) or containers to keep fibers from becoming airborne. Storage of asbestos waste shall occur in the same areas presented earlier for the storage/staging of any solid waste (also shown on Figure SW-1). Containers shall be kept sealed when not in use to prevent precipitation or other weather conditions from disturbing the waste. Asbestos waste will be stored on-site and accumulated until a shipment is made to an authorized treatment/disposal facility. If it becomes necessary because of a damaged bag or container, UOR will process and treat asbestos waste per

one of the methods listed in Env-Sw-901.03 including spraying the material with water and/or covering with an encapsulant or sealant. It is not anticipated that this will occur frequently.

UOR will not be picking up asbestos at the point of generation. Therefore, it will be transported to the facility. Upon arrival, UOR will assure that the transporter has followed the requirements of Env-Sw-901.06 Transportation, Packaging and Labeling Requirements. Specifically UOR will check:

- The shipping paper to assure that the asbestos was identified and shipped correctly and that the volume/weight is accurate;
- The labeling of the bag/container to assure that it is proper per the regulations; and
- The type of packaging including the thickness of the bag being at least 6 mil polyethylene or equivalent; or liner (if bulk unwrapped asbestos waste is received) being at least 20 mil polyethylene or equivalent.

It is UOR's expectation that asbestos waste will be properly packaged (per Env-Sw-901) prior to delivery to UOR. If, upon delivery of asbestos waste to the facility, UOR finds that the packaging is not adequate, the contractor and/or UOR staff shall re-package the waste. UOR will stock empty containers and extra bags on-site. Asbestos loads outbound to an authorized disposal facility shall also be subject to Env-Sw-901.06. UOR shall assure that the transporter is following these regulatory requirements prior to shipment off-site.

Operators at UOR who will be involved in asbestos operations shall be trained to the EPA Asbestos Certification standard. This would include a 40 hour initial training class. This would allow the operators to participate in re-bagging, processing/treatment (Env-Sw-901.03(b)), and spill response of asbestos waste. Training shall follow the regulatory requirements of Env-Sw-901.08(a).

Asbestos staging/storage areas at United Oil Recovery, Inc. shall be provided with signage as required by Env-Sw-901.02(d)(4). Specifically the following areas shall contain signage:

- Front Operations Area A (Solid Waste Area 1);
- Rear of Dock (Solid Waste Area 2);
- Dock/Trailers (Solid Waste Area 5); and
- Back Operations Area (Solid Waste Area 6).

The signage shall read "DANGER-ASBESTOS WASTE STORAGE AREA-DUST, CANCER, AND LUNG DISEASE HAZARD-AUTHORIZED PERSONNEL ONLY" (or equivalent wording).

Other requirements found in Env-Sw-901.02(d) shall also be followed at UOR. UOR will ship to asbestos to an authorized disposal facility pursuant to Env-Sw-901.04(a). Currently, the three landfills that UOR will utilize are:

- Waste Management-Turnkey Landfill (Rochester, NH);
- Crossroads Landfill and Transfer Station (Norridgewock, ME); and
- Ontario County Landfill (Stanley, NY);

Note that other authorized facilities may be used as well.

UOR shall follow the other requirements of Env-Sw-901.04(b) when friable asbestos is being landfilled.

Authorized Solid Waste #7: Ash Receipt, Treatment/Processing, Staging/Storage, and Transfer
UOR may receive, solidify (if needed), and stage/store ash on-site. UOR shall follow the same procedures presented above under “Solidification in Processing Units (Pits)” and “Staging/Storage of On-Site Containers” for the management of ash wastes on-site. UOR follows the requirements presented in the New Hampshire Solid Waste Rules Env-Sw-902 for the management of ash waste. Note that pursuant to the Hazardous Waste Rules (Env-Hw 4012.03(b)(4)) the following types of ash are exempt from regulation under the hazardous waste rules: “Fly ash waste, bottom ash waste, slag waste, and flue gas emission control waste generated primarily from the combustion of coal or fossil fuels”. Another hazardous waste exemption that applies is Env-Hw 4012.03(b)(23): “Wood ash from the burning of wood products which is only hazardous due to the corrosivity characteristic as set forth in Env-Hw 403.04(b)(3)”. UOR will still follow its initial waste characterization and waste acceptance verification for ash (as listed in Table 1), but may use this exemption when applicable for the acceptable receipt of ash.

Authorized Solid Waste #8: Contaminated Soils/Media Receipt, Treatment/Processing, Staging/Storage, and Transfer

UOR may receive, solidify (if needed), and stage/store contaminated soils/absorbent media contaminated with liquids and considered non-hazardous. Examples of these wastes include soil, absorbents, sand, and debris contaminated with oil, grease, fats, and other petroleum products as well as other liquids not considered hazardous waste. UOR shall follow the same procedures presented above under “Solidification in Processing Units (Pits)” for soils/media that has liquid/moisture content that requires solidification and “Staging/Storage of On-Site Containers” for the management of contaminated soils/media on-site. UOR follows the requirements presented in the New Hampshire Solid Waste Rules Env-Sw-903 for the management of contaminated soils/media. Specifics include storage of these wastes in sealed containers and in areas/in a manner to prevent exposure to precipitation. Following any solidification needed, such wastes are staged/stored on-site until shipped to a third party facility for treatment or disposal. Wastes with adequate BTU value (e.g., those contaminated with oil) may be candidates for trash to energy facilities, pending availability and waste characteristics. If sending these wastes to facilities for reuse (Env-Sw-903.05), UOR shall follow the requirements of 903.05 including following the maximum contaminant concentrations listed in Table 900-1. Note that there are several exemptions under the Hazardous Waste Rules for spill absorbent material, soil, and debris. They are Env-Hw 401.03(b)(17),(18),(19), and (21). They are listed below.

- Env-Hw 401.03(b)(17) Spill absorbent materials, soil and debris from the cleanup of spills of virgin fuel oil and virgin lubricating products, provided that the spill absorbent, materials, soil and debris do not exhibit a hazardous waste characteristic as set forth in Env-Hw 403;

- Env-Hw 401.03(b) (18) Spill absorbent materials, soil and debris from the cleanup of used oil spills, provided the used oil was not previously mixed with any other hazardous wastes listed in Env-Hw 402, and provided the spill absorbent materials, soil or debris do not exhibit a hazardous waste characteristic as set forth in Env-Hw 403;
- Env-Hw 401.03(b)(19) Spill absorbent materials, soil and debris from the cleanup of spills of virgin gasoline, provided that the spill absorbent materials, soil and debris do not exhibit a hazardous waste characteristic as set forth in Env-Hw 403;
- Env-Hw 401.03(b)(21) Petroleum-contaminated media and debris that: a. Fail the test for the toxicity characteristic of hazardous waste codes D018 - D043 only, as set forth in Env-Hw 403.06; b. Are generated from releases of underground storage tanks subject to Env-Wm 1401; and c. Are subject to the corrective action regulations under Env-Or 600.

UOR will still follow its initial waste characterization and waste acceptance verification for these wastes (as listed in Table 1), but may use this exemption when applicable for the acceptable receipt of contaminated soils/media.

Authorized Solid Waste #9: Over the Counter and Prescription Pharmaceuticals Receipt and Transfer

UOR may receive and stage/store non-hazardous over the counter and prescription pharmaceuticals on-site. Controlled substances may not be received by UOR. Acceptable wastes are typically pharmaceuticals that have expired or are no longer needed as generated by households, pharmacies, and factories. UOR shall follow the same procedures presented above under "Staging/Storage of On-Site Containers" for the management of over the counter and prescription pharmaceutical wastes on-site. The labeling of the containers will be done at the generator's site prior to the transporter picking the waste up. Many of these wastes are characterized, profiled, packaged, and labeled by a lab pack technician on the generator's site. Many of these wastes are also placed in containers of 55 gallon size or less. UOR will confirm that the labels match the shipping papers prior to placing the container in storage. UOR will also check the DOT hazardous materials classification to assure that incompatible containers are not near each other. The hazardous waste transfer permit application contains an appendix on identifying and managing incompatible materials, mainly in use for the transfer dock; (Appendix 6F - Special Management Requirements for Ignitable, Reactive, and Incompatible Wastes). Since the transfer dock is the most likely area that pharmaceuticals are expected to be managed in, the same procedures for managing incompatible materials will be utilized. Note that NH DES has stated that approximately 10% of these wastes are hazardous and would be covered under our hazardous waste transfer permit, not the solid waste permit. NH DES has provided a list of hazardous waste pharmaceuticals and their associated waste codes for our reference. At times a container of these wastes may be bulked into another container, but this occurrence is not the norm and if it were to occur, the materials being combined would likely be the same waste in different original containers. If different wastes were to be bulked, UOR will determine the compatibility of the materials prior to processing. This would be done by checking each material's MSDS or specification sheet, contacting the generator or manufacturer of the material, contacting the lab pack technician/chemist (if one was involved in packaging this waste), consulting with one of UOR's chemists, and/or performing a bench test. UOR will not perform bulking of any wastes unless compatibility was determined to exist.

Authorized Solid Waste #10: Non-TSCA PCB Contaminated Solid Waste Receipt, Bulking/Consolidation, Staging/Storage, and Transfer

UOR may receive, process, stage/store, and transfer (as outlined above) solid wastes that are contaminated with non-TSCA PCBs. UOR shall follow the same procedures presented above under "Staging/Storage of On-Site Containers". Non-TSCA PCBs are defined as those less than 50 ppm that were not blended down from a known source of TSCA PCBs. Note that TSCA PCBs may be handled on-site through the hazardous waste transfer permit. PCBs can be found both in liquid oil and water and may be found in solids including wood and other flooring, concrete, caulking, and other equipment (typically when oil with PCBs has contaminated these materials).

Authorized Solid Waste #11: Household Non-Hazardous Waste Receipt, Bulking/Consolidation, Staging/Storage, and Transfer

UOR may receive, process, stage/store, and transfer non-hazardous solid wastes generated from households. UOR will not receive these wastes directly on-site from households or members of the general public. These items are typically generated or received as part of a household waste collection day or through a collection service offered by a municipality or region. Non-hazardous waste examples include latex paint, oil and oil contaminated debris, roofing tars, and non-hazardous automotive and maintenance fluids. Note that household hazardous wastes may be handled on-site through the hazardous waste transfer permit. In general, wastes from households are exempt from the Hazardous Waste Rules per Env-Hw 401.03(b)(1).

Authorized Solid Waste #12: Empty Used Drums/Containers and Expended Fire Extinguishers Receipt, Bulking/Consolidation, Staging/Storage, and Transfer

The hazardous waste regulations define empty containers in Env-Hw-401.03(h). This citation along with 401.03(b)(20) also both exempt them from the hazardous waste rules. Empty containers in Env-Hw-401.03(h) are typically referred to as RCRA empty. UOR will follow this regulatory requirement in determining that drums, other containers, and fire extinguishers are empty. This definition of empty shall be used for drums, containers, and fire extinguishers that held hazardous waste, non-hazardous waste, non-regulated waste, and virgin products. If UOR is emptying the container prior to processing it, a RCRA waste characterization would have been done on the waste itself to determine its nature.

Env-Hw-401.03(h)

... containers and inner liners shall be deemed empty under the following conditions:

- (1) For those containers or inner liners which have held hazardous waste other than compressed gas or acute hazardous waste identified in Env-Hw 402.04, when all wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, such as pouring, pumping, and aspirating, and:
 - a. No more than one inch of residue remains on the bottom of the container or inner liner; or
 - b. The amount of residue remaining in the container or inner liner is:
 1. No more than 3 percent by weight of the total capacity of the container if the container is less than or equal to 119 gallons in size; or
 2. No more than 0.3 percent by weight of the total capacity of the container if the container is greater than 119 gallons in size;

- (2) For those containers which have held a hazardous waste that is a compressed gas, when the pressure in the container approaches atmospheric pressure;
- (3) For those containers or inner liners which have held acutely hazardous waste, when:
- The containers or inner liner have been triple rinsed using a solvent capable of removing the commercial chemical product or manufacturing chemical intermediate;
 - The container or inner liner has been cleansed by another method that has been shown in the scientific literature, or by tests conducted by the generator, to achieve equivalent removal; or
 - In the case of a container, the inner liner that prevented contact of the commercial chemical product or manufacturing chemical intermediate with the container has been removed.

Authorized Solid Waste #13: Non-Hazardous Aerosols and Other Compressed Gas Cylinders (these waste gases may be classified as DOT Class 2, Division 2.2 (non-flammable))

Bulking/Consolidation, Staging/Storage, and Transfer

Compressed gases that are non-flammable may be accepted into UOR for staging/storage and eventual off-site transfer. Bulking and consolidation may occur as well, but no opening or draining of gases. These are gases such as non-hazardous aerosols (e.g., paints, solvents) coming in a variety of sizes and non-flammable cylinders (e.g., oxygen). UOR will receive these gases already in a container (e.g., drum size up to roll-off size), store them on-site (typically at the dock or in the Front or Back Operations Areas if in roll-offs), and then send them either to a recycling or incineration facility. Hazardous aerosols or other compressed gases (e.g., flammables such as propane or butane and aerosols containing hazardous solvents) would be covered under the hazardous waste transfer permit.

Authorized Solid Waste #14: Non-Hazardous DOT Class 6, Division 6.1 Poisonous Materials Assigned to Packing Group II or III Receipt, Staging/Storage, and Transfer

This is a minor waste category that UOR may come upon from time to time. It is called out in this permit mainly because it trips a unique DOT hazardous material class (Class 6, Division 6.1). One example of this waste stream is solidified isocyanate resins. Wastes in this category would be staged/stored on-site and shipped off-site for treatment/disposal.

Authorized Solid Waste #15: Non-Hazardous Non-Infectious Waste from Medical Facilities

Much of the solid waste that may fall into this category may also fall into one of the other 14 categories listed under "Authorized Wastes". Since it is being generated at a medical facility however (e.g., hospital, clinic, doctor's office, etc.) UOR felt that a separate category should be delineated.

Per Solid Waste Rule 904.01(b) the following materials generated at medical facilities may be considered non-infectious medical wastes:

- Gloves, gowns, underpads or any other materials that come in contact with patients, but not saturated with blood, body fluids or secretions, through routine examination or patient care.

UOR would also like to add to this list containers, packaging, or other equipment that have had no contact with blood, body fluids, clinical cultures, or other infectious agents.

Authorized Solid Waste #16: Scrap Plastic and Metal (Drums/Containers, Tanks, Other) Receipt, Staging/Storage, and Transfer

The hazardous waste exemption for scrap metal is found at Env-Hw 401.03 (a)(9). This category may include those materials from Solid Waste #12 once they received on-site and verified to be empty. This category also include virgin containers no longer suitable for use or being scrapped as well as scrap tanks and other equipment (e.g., piping). UOR will stage these scrap materials on-site prior to transporting them off-site for refurbishing, recycling, or scrap.

Note that for all of the above categories unless specified differently, bulking/consolidating may be performed as part of standard operations. This means that wastes may be moved from vehicle to vehicle in the same container or that the container may be opened and the waste moved into a different (oftentimes larger) storage container.

Note that procedures detailed above may change or alter based on new or different equipment, vehicles, or processing methods at the facility. Minor alterations will not be cause for these written procedures to be updated.

Managing Bypass Wastes

Bypass wastes that may be shipped into the facility as a mistake will be staged in a location that is safe and environmentally sound until arrangements can be made either to return the waste to the generator or ship it to a proper disposal facility. A set location for bypass wastes will not be provided in this plan. Instead it will be up to the judgment of the Plant Manager to determine the best place to store a particular bypass waste until arrangements can be made to remove it from the facility. The Plant Manager will base his decision on the type, size and quantity of the waste, compatibility of other stored wastes, storage area space, and safety/environmental concerns. UOR will follow the rejection procedure presented above in the subsection "Discrepancies & Rejections".

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 related materials, paint contaminants are fuels, paint related materials, or solvents) • Oil metals (As, Cd, Cr, Pb) if managing as a used oil | Visual to assure that physical/other description on profile matches <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 | Visual to assure that physical/other description on profile matches <ul style="list-style-type: none"> • % phases (water, sediment/solids) |
| 5. Construction and demolition debris | <ul style="list-style-type: none"> • Complete profile form • Possibly TCLP for constituents of concern based on point of generation (metals and/or organics may be needed) | Visual only to assure that physical/other description on profile matches |

| Authorized Waste | Initial Waste Characterization Analytical & Other Requirements | Waste Verification Analytical & Other Requirements |
|---|--|---|
| 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 |
| 10. Non-TSCA PCB contaminated solid wastes | <ul style="list-style-type: none"> Complete profile form PCBs (on solids) TCLP metals | Visual to assure that physical/other description on profile matches <ul style="list-style-type: none"> PCBs (on solids) |

| Authorized Waste | Initial Waste Characterization Analytical & Other Requirements | Waste Verification Analytical & Other Requirements |
|--|---|--|
| 10. Non-TSCA PCB contaminated solid wastes (cont.) | <ul style="list-style-type: none"> • 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> | <ul style="list-style-type: none"> • % 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 | <p>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> | <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 | <p>None</p> | <p>Visual to assure that physical/other description on profile matches; specifically checking that the drums/containers or fire extinguishers are empty</p> |
| 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. | <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 |
|---|---|--|
| 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 ≤ 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 #3 above | <u>Liquids:</u> same as #3 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>Metals reclamation</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>Devens Recycling Center, LLC 45 Independence Drive Devens, MA 01434</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>Devens Recycling Center, LLC 45 Independence Drive Devens, MA 01434</p> <p>Interstate Waste Services Moretown Landfill</p> |

| Authorized Waste | Primary Disposal Facility & Processing/Disposal Method | Other Disposal Facilities & Processing/Disposal Method |
|---|---|---|
| 4. Industrial wastewater treatment plant sludge (not municipal sludge from POTWs) (cont.) | <p>All of the above are landfills</p> | <p>19 Kaiser Drive Waterbury, VT 05671</p> <p>Mt. Carberry Landfill 80 Hutchins St Berlin, NH 03570</p> |
| 5. Construction and demolition debris | <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>Devens Recycling Center, LLC 45 Independence Drive Devens, MA 01434</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 |
|---|--|---|
| 6. Asbestos as regulated under Env-Sw 901 | Turnkey Recycling and Environmental Enterprises 90 Rochester Neck Road P.O. Box 7065 Rochester NH 03839 Landfill | Crossroads Landfill and Transfer Station 357 Mercer Road P.O. Box 629 Norridgewock, Maine 04957 Ontario County Landfill 1879 Rt. 5&20 Stanley, NY 14561 |
| 7. Ash as regulated under Env-Sw 902 | New England Waste Services of Vermont, Inc. Airport Road Newport, VT 05855 Landfill | Both of the above are landfills Turnkey Recycling and Environmental Enterprises 90 Rochester Neck Road P.O. Box 7065 Rochester NH 03839 Devens Recycling Center, LLC 45 Independence Drive Devens, MA 01434 Interstate Waste Services Moretown Landfill 19 Kaiser Drive Waterbury, VT 05671 Mt. Carberry Landfill 80 Hutchins St Berlin, NH 03570 |
| 7. Ash as regulated under Env-Sw 902 (cont.) | | All of the above are landfills |
| 8. Contaminated soils and media as regulated under Env-Sw 903 | New England Waste Services of Vermont, Inc. Airport Road | Turnkey Recycling and Environmental Enterprises 90 Rochester Neck Road |

| Authorized Waste | Primary Disposal Facility & Processing/Disposal Method | Other Disposal Facilities & Processing/Disposal Method |
|--|--|--|
| <p>8. Contaminated soils and media as regulated under Env-Sw 903 (cont.)</p> | <p>Newport, VT 05855 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>Both above are soil reclamation facilities using thermal treatment to reclaim soils</p> | <p>P.O. Box 7065 Rochester NH 03839</p> <p>Devens Recycling Center, LLC 45 Independence Drive Devens, MA 01434</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>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> | <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>Devens Recycling Center, LLC 45 Independence Drive Devens, MA 01434</p> <p>Interstate Waste Services</p> |

| Authorized Waste | Primary Disposal Facility & Processing/Disposal Method | Other Disposal Facilities & Processing/Disposal Method |
|---|--|---|
| 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 (cont.) | | <p>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> <p>Devens Recycling Center, LLC 45 Independence Drive Devens, MA 01434</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 |
|---|--|--|
| 11. Household non-hazardous wastes | <p><u>Liquids:</u> same as #3 above</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>Liquids:</u> same as #3 above</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>Devens Recycling Center, LLC 45 Independence Drive Devens, MA 01434</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> |
| 12. Empty used drums/containers (metal, plastic, other) and expended fire extinguishers | <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</p> |

| Authorized Waste | Primary Disposal Facility & Processing/Disposal Method | Other Disposal Facilities & Processing/Disposal Method |
|---|--|---|
| <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>drums/containers based on condition</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>United Oil Recovery, Inc. * 136 Gracey Avenue Meriden, CT 06451</p> <p>Bridgeport United Recycling, Inc. * 50 Cross Street Bridgeport, CT 06610</p> | <p>See response in column to left</p> |
| <p>15. Non-hazardous non-infectious waste from medical facilities</p> | <p><u>Liquids:</u> same as #3 above</p> <p><u>Solids with BTU value</u> (e.g., oil contaminated) Maine Energy Recovery Company (MERC)</p> | <p><u>Liquids:</u> same as #3 above</p> <p><u>Solids with no BTU value</u> Turnkey Recycling and Environmental Enterprises 90 Rochester Neck Road</p> |

| Authorized Waste | Primary Disposal Facility & Processing/Disposal Method | Other Disposal Facilities & Processing/Disposal Method |
|--|--|---|
| 15. Non-hazardous non-infectious waste from medical facilities (cont.) | <p>3 Lincoln Street Biddeford, ME 04005</p> <p>Burned for energy recovery</p> <p>Solids with no BTU value</p> <p>New England Waste Services of Vermont, Inc.</p> <p>Airport Road Newport, VT 05855</p> <p>Landfill</p> | <p>P.O. Box 7065 Rochester NH 03839</p> <p>Devens Recycling Center, LLC 45 Independence Drive Devens, MA 01434</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> |
| 16. Scrap plastic and metal (drums/containers, tanks, other) | <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>All of the above are landfills</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> |

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

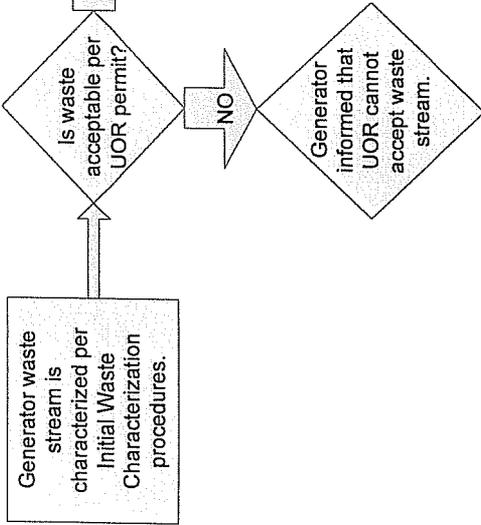
NOTE ON OVERALL TABLE: The above list is not exhaustive or exclusive. United Oil Recovery, Inc. (UOR) may ship the listed wastes both to listed facilities other than the primary and non-listed facilities. UOR provides this list as part of the permitting process and is not obligated to keep it up to date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

Section 3

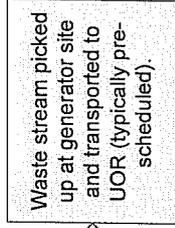
Solid Waste Process Flow Chart Wastes Placed in Processing Units

**Solid Waste Process Flow Chart
Wastes Placed in Processing Units
United Oil Recovery, Inc.
Newington, NH**

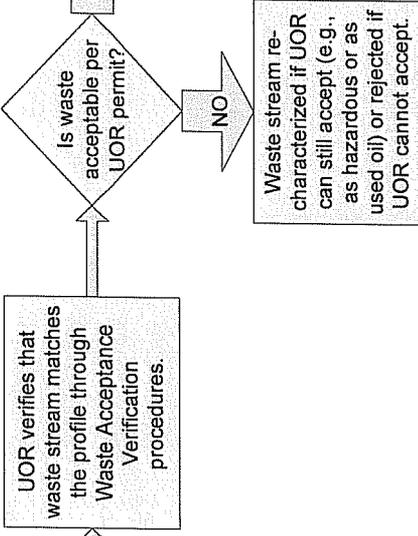
WASTE STREAM CHARACTERIZATION



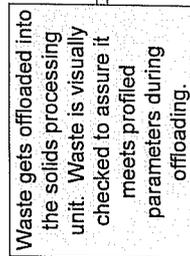
WASTE PICK UP & TRANSPORTATION



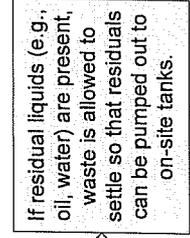
VERIFICATION



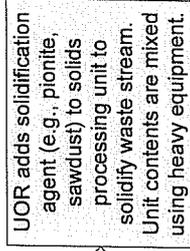
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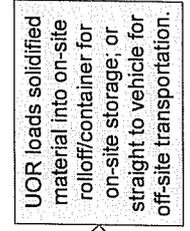
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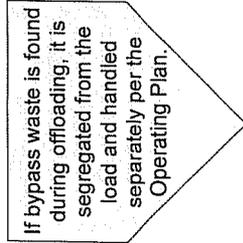
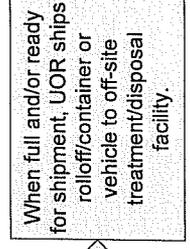
SOLIDIFICATION



STORAGE



OFF-SITE TRANSPORTATION

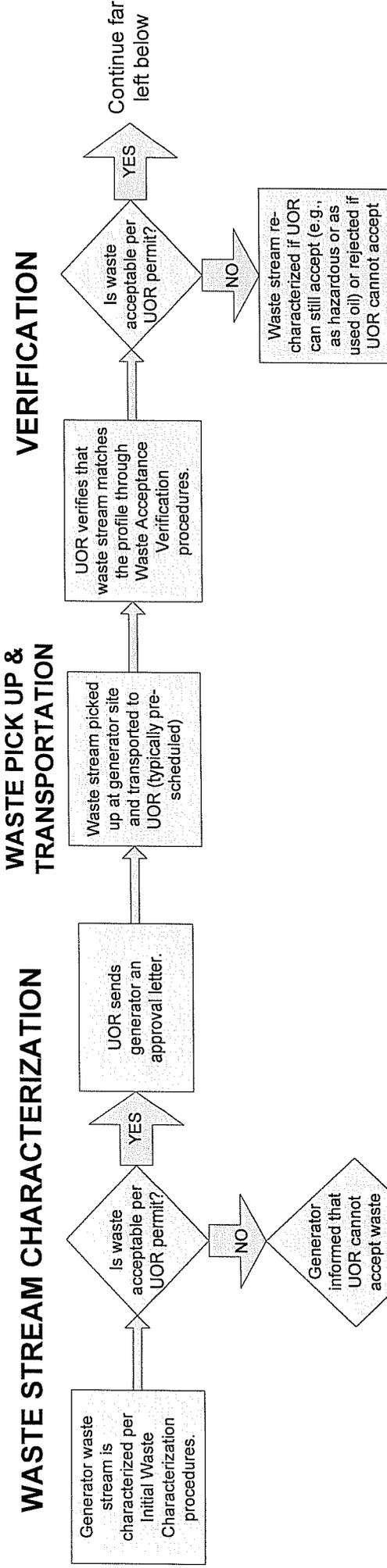


Note: Bulking and/or consolidation may occur with any Solid Waste while on-site.

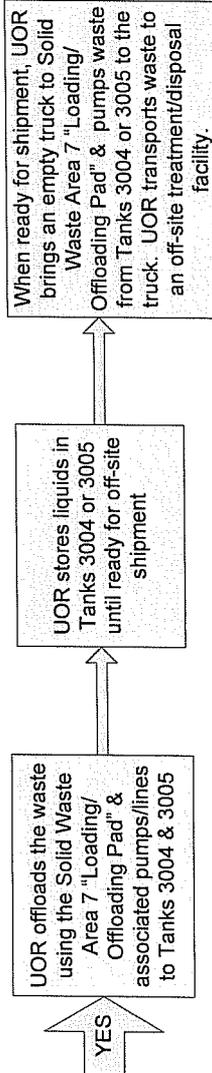
Section 3

Solid Waste Process Flow Chart Liquids to Tanks 3004 & 3005

Solid Waste Process Flow Chart
Liquids to Tanks 3004 & 3005
United Oil Recovery, Inc.
Newington, NH



OFFLOADING **STORAGE** **OFF-SITE TRANSPORTATION**



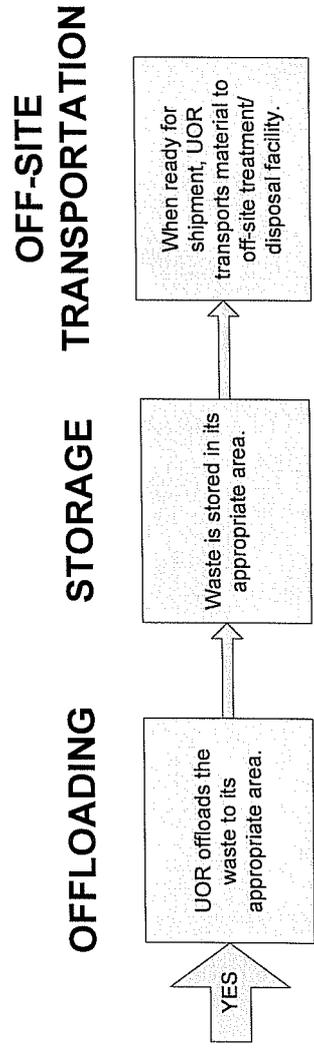
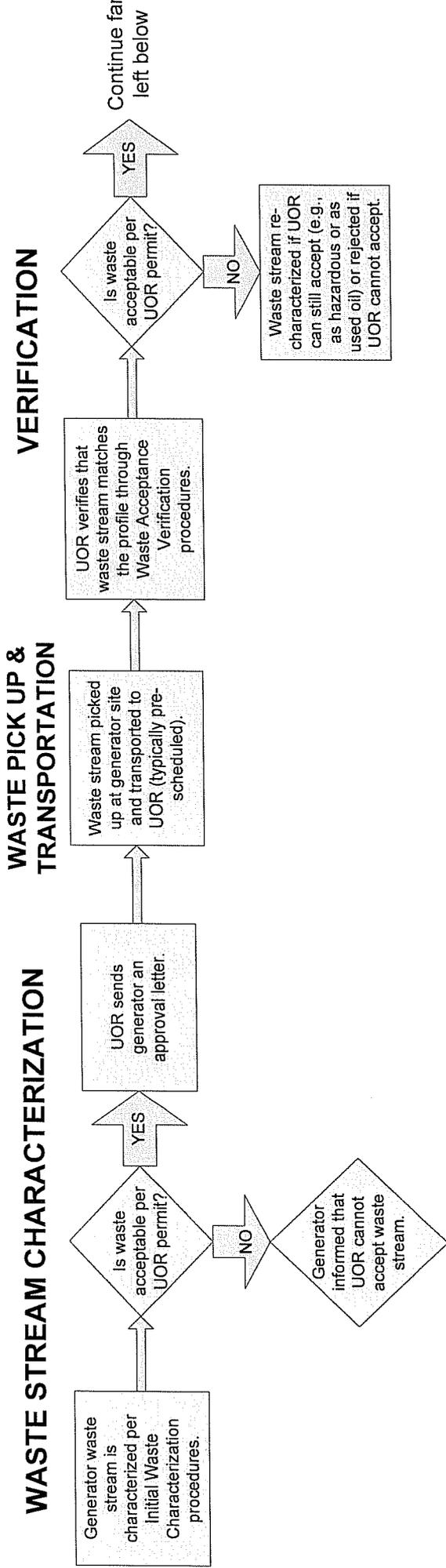
If bypass waste is found during offloading, it is segregated from the load and handled separately per the Operating Plan.

Note: Bulking and/or consolidation may occur with any Solid Waste while on-site.

Section 3

**Solid Waste Process Flow Chart
On-Site Storage**

Solid Waste Process Flow Chart
On-Site Storage
United Oil Recovery, Inc.
Newington, NH



Note: Bulking and/or consolidation may occur with any Solid Waste while on-site.

Section 4: Residual Waste Management Plan

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. The receiving facility will 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 ¹ and residual solids to a landfill or trash-to-energy plant ². 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. Currently the authorized facilities for these residual wastes are listed below.

¹ Facilities listed in last column under Authorized Waste #2 on Table 2 "Solid Waste Disposal Facilities Used"

² Facilities listed in last column under Authorized Waste #3 on Table 2 "Solid Waste Disposal Facilities Used"

Note: although not considered a residual waste, the recovered used oil is also sent to the facilities listed under footnote 1 above (UOR operated facilities).

Section 5: Facility Maintenance, Inspection, and Monitoring Plan

Introduction

The intent of the general inspection program is to detect equipment and overall facility malfunctions and deterioration, operator errors, and discharges which could cause or lead to a release of waste or materials potentially causing a threat to human health or the environment. The frequency of inspection is intended to detect and remedy any problem which might lead to such a release before a hazard results.

Responsibility

Inspections are conducted by the Facility Manager or his designee.

Inspection Checklist and Frequency of Inspection

Attachment 3 to this Operating Plan is an example of the daily and annual inspection logs. The log notes items to be inspected, the frequency of inspection, the types of problems to be looked for, and also has a place for the date and time of the inspection and the name of the inspector. In the event there is an item that needs repair or remedy, this repair will be noted on the log along with the date the repair was completed. The daily inspection log will have the information discussed on this list at a minimum; however, the format of the form may be changed and items may be added. Included in Attachment 3 for reference purposes are UOR's inspection logs from the Hazardous Waste Transfer Permit in order to show that some items are already covered in those logs. UOR will not repeat an inspection item on its solid waste log sheet if already covered on another log sheet. The inspection log is laid out by permitted Solid Waste Area along with a section for "General Facility" that includes specific wastes (asbestos and bypass).

Remedy of Problems Found During Inspection

United Oil Recovery, Inc. will remedy problems which could lead to an environmental or human health hazard as soon as possible after identification, in an effort to prevent such hazard. More minor problems noted during an inspection will be responded to in a timely manner, consistent with the magnitude of the problem. If a problem has already caused such hazard, or if such hazard is imminent, an action remedying the problem will be initiated as soon as the problem is noted.

Maintenance of Inspection Records

Completed inspection forms will be kept on-site for a period of three years from the date of inspection.

Application Items

Presented below is the list of items listed on the application form and how UOR shall inspect and maintain its facility based on the item.

- Spontaneous combustion – UOR does not accept solid wastes that may spontaneously combust.
- Other fire hazards – UOR shall inspect its facility to assure that safety and emergency equipment (including fire extinguishers) are available and in good working condition. UOR shall follow its Contingency Plan in the event of a fire that is not easily extinguished through the use of hand-held fire extinguishers.

- Vector production – UOR does not accept or store municipal or putrescible wastes on-site, therefore this item is not applicable.
- Generation of methane, hazardous and/or explosive gases – In terms of solid waste storage and processing, UOR does not accept gases that are flammable and may emit hazardous or explosive gases. Small containers of aerosols and fuel cylinders such as propane and butane may be accepted for processing under the Hazardous Waste Transfer Permit. Upon receipt, such containers would be inspected to assure that they are sealed and not leaking. They would then be stored in a secure location of the facility and inspected as part of the daily inspections. Following site storage, these materials will be shipped off-site for recycling/disposal.
- Odors – UOR does not accept or store municipal or putrescible wastes on-site, therefore this item is not applicable, although the facility will inspect for any foul odors when conducting its routine inspections.
- Dust – Since UOR is not a landfill, the generation of dust is minimal. Wastes are typically kept covered/sealed when they are not being processed/treated, limiting dust potential from these sources. UOR shall monitor the facility for dusty conditions as part of routine inspections. Authorized wastes with the potential to generate dust are ash, soils/media, and construction and demolition debris. These wastes are called out specifically on the log in terms of potential dust generation.
- Windblown litter – Since UOR is not a landfill this item is not applicable.
- Leachate – Since UOR is not a landfill this item is not applicable.
- Spills – UOR inspects for the release of wastes/materials and the potential conditions that can lead to a release. Spill response equipment is also regularly inspected. Please reference Attachment 3 for these line items. Note that inspection of emergency and spill response equipment was already part of the logs for the Hazardous Waste Transfer Permit so these line items were not repeated on the Solid Waste Facility – Daily Inspection Log. On-site locations of this equipment are indicated on Figure SW-1 with the label “Emergency and Other Equipment Storage”.

Section 6: Contingency Plan

United Oil Recovery, Inc. has prepared a Contingency Plan as part of its Hazardous Waste Transfer Facility permit. Emergencies and contingencies presented in that plan would be the same as for UOR's solid waste operations. UOR believes that for the sake of the operators and emergency responders, one complete plan should be used for the full facility. For that reason, UOR has simply copied the Contingency Plan as approved under its Hazardous Waste Transfer permit for use in this Application and added changes requested by the NH DES Solid Waste Bureau. Note that hazardous waste regulation citations were left in the plan although they do not apply to solid waste. Consequently, solid waste regulation citations are not in the attached plan.

For review purposes in this Application (and for the Hazardous Waste Bureau's review), UOR has highlighted information requested to be inserted by the NH DES Solid Waste Bureau.

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

1.0 PURPOSE (40 CFR 264.51)

This plan discusses contingency planning for United Oil Recovery, Inc.'s (UOR's) hazardous waste transfer and solid waste facility. It is provided as part of UOR's hazardous waste permit renewal application and solid waste application. It is a dual plan satisfying the requirements of both the NH DES hazardous and solid waste rules.

UOR also maintains a Spill Prevention, Control, and Countermeasure (SPCC) Plan for oil and other non-hazardous materials that are handled at the facility. The SPCC Plan provides emergency response planning and procedures for releases of oil or other hazardous materials.

The Contingency Plan and emergency procedures herein are designed to minimize hazards to human health and the environment from fires, explosions, and the unplanned sudden and non-sudden release of hazardous and solid waste constituents to the air, soil, or surface water. This includes solid waste asbestos spills and operator injuries.

UOR operations personnel are trained in the Contingency Plan and emergency procedures discussed in this document and will carry out its provisions as soon as possible if there is a fire, explosion, or release at the hazardous or solid waste transfer facility.

2.0 EMERGENCY COORDINATOR (40 CFR 264.55)

There will be at least one UOR emergency coordinator either on the facility premises or on call and able to be reached by either home phone or Nextel phone/radio. This person will be thoroughly familiar with the facility's Contingency Plan, operations and activities at the facility, the location and characteristics of waste handled, the location of records relating to the facility and the transfer facility layout. The designated Emergency Coordinator and his alternate have the authority to commit the resources needed to carry out the Contingency Plan.

Contact information of the Emergency Coordinator and his alternate is listed below:

| | NAME | HOME ADDRESS & PHONE | WORK ADDRESS & PHONE | NEXTEL 24 HOUR PHONE |
|--|------------------|---|--|---------------------------------|
| Emergency Coordinator | Dave Burditt | 5 Plum Street Exeter, NH 03833 (603) 773-5976 | 410 Shattuck Way Newington, NH 03801 (603) 431-2420 | (603) 396-0540 |
| Alternate Emergency Coordinator | Kris Fournier | 2 Donigans Way Barrington, NH 03825 (603) 335-0840 | 410 Shattuck Way Newington, NH 03801 (603) 431-2420 | (603) 396-0556 |

3.0 EMERGENCY NAMES, ADDRESSES, TELEPHONE NUMBERS (40 CFR 264.52(D))

Police, fire, and rescue personnel from Newington and other nearby towns can be contacted in an emergency by dialing **911**. In addition to the 911 emergency dispatch system, direct phone numbers for local, state, and federal authorities are provided in the following list of emergency contacts.

3.1 Main Emergency Numbers

| | | |
|------------|---|-----------------------|
| Fire: | Newington Fire Department | 911 or (603) 436-9441 |
| Police: | Newington Police Department | 911 or (603) 431-5461 |
| | NH State Police-Dispatch | (603) 271-3636 |
| Ambulance: | Newington Fire Department | 911 or (603) 436-9441 |
| Hospital: | Portsmouth Regional Hospital | (603) 436-5110 |
| | New Hampshire 24 hour State Emergency Response (State Police) | 911 or (800) 852-3411 |
| | NH DES Waste Management Division (Hazardous Waste) | 911 or (603) 271-3636 |
| | NH DES Solid Waste Management Bureau | (603) 271-3899 |
| | NH DES Groundwater Protection Bureau (Oil) | (603) 271-2925 |
| | | (603) 271-3644 |

3.2 Backup Numbers

| | | |
|------------|------------------------------|-----------------------|
| Fire: | Dover Fire Department | 911 or (603) 742-4646 |
| | Portsmouth Fire Department | 911 or (603) 427-1515 |
| Police: | Dover Police Department | 911 or (603) 742-4646 |
| | Portsmouth Police Department | 911 or (603) 427-1500 |
| Ambulance: | Portsmouth | 911 or (603) 427-1500 |

3.3 Spills

The National Response Center Shall Be Notified if a Reportable Quantity of a Hazardous Material is Released.

National Response Center (800) 424-8802

The U.S. Coast Guard shall be notified if a spill reaches the Piscataqua River.

Primary: U.S. Coast Guard Marine Sector Detachment Portsmouth NH (603) 433-7324

Secondary: U.S. Coast Guard Sector Northern New England (Portland ME) (207) 780-3675

4.0 EMERGENCY EQUIPMENT AND COMMUNICATION SYSTEMS (40 CFR 264.52(E))

The UOR facility is equipped with a hard-line telephone system. Employees also carry Nextel cellular telephones/2-way radios for internal and external communications.

Emergency equipment includes:

- Fire Hydrants – There are four hydrants connected to city water in the area. Two of these are newly installed and are the closest to the United facility. One is located just south of the facility inside the Sprague fence along Shattuck Way, and the other is just west of the facility on Shattuck Way.
- Fire Extinguishers – A minimum of four fire extinguishers, type ABC, are located at the Hazardous Waste Transfer Dock. At least two are located at ground level, and two are located on the surface of the transfer dock. Additionally, there are a minimum of 12 additional fire extinguishers, type ABC, at various locations throughout the facility. Fire extinguishers are checked on a monthly basis to make sure they are maintained in a full condition and to ensure that they remain in their set locations. UOR employs a contractor to have the fire extinguishers inspected and recharged on a regular basis.
- Fire Alarms – The UOR facility is equipped with both pull alarms and smoke/heat detectors. These alarms connect directly to the Newington Fire Department in addition to sounding an audible alarm. The Fire Department regularly checks these alarms.
- Spill control equipment, decontamination equipment, and personal protective equipment are all kept on site. UOR performs emergency response work for clients throughout New England and thus keeps a variety of emergency response equipment at the facility. This equipment includes items such as empty and overpack drums, personal protective equipment (suits, gloves, and boots of various materials to be selected depending on the chemical involved), respirators and cartridges, a 4-way confined space entry meter, sorbent pads and boom, Speedy Dry and other equipment normally associated with this sort of work. This equipment is stored in various locations at the facility. As part of operations, UOR may also have on-site a front-end loader, back hoe, roll-off containers, and a stockpile of sawdust or a similar sorbent material that can be used in an emergency response situation. A yard vacuum truck is also maintained on-site. The Inspection Program outlined in Appendix 6D (Inspection Program) insures that this inventory is kept well stocked. Additionally, this equipment is used frequently in UOR's clean up and remediation work with clients. Any broken or malfunctioning equipment is immediately repaired or replaced.
- The Emergency Response Guidebook published by the U.S. Department of Transportation, Research and Special Programs Administration is available for reference in the facility office and/or in transport vehicles.

5.0 EVACUATION PLAN (40 CFR 264.52(F))

Facility employees carry Nextel portable phones/2-way radios that are programmed to allow an emergency message to be broadcast to all Nextels. In the event an evacuation is

necessary, the Emergency Coordinator will determine the best location for employees to gather based on the location of the release, the wind direction, the path of emergency responders, etc. The Emergency Coordinator will broadcast the evacuation message on the Nextel system, telling employees which evacuation location they should gather at and the best route to get there. The two designated evacuation locations are the Equipment Storage Building and the parking area (shown on Figure NH-3). If an alarm is sounded, operations personnel shall cease all activities, secure any transfer operations in progress and proceed in an orderly manner to the closest usable evacuation location. They will wait at this location until they receive further instruction from the emergency coordinator or his designated alternate.

There is a gated entrance from Shattuck Way direct to the UOR facility that can be used in the event of an emergency to evacuate personnel or to allow entrance for emergency responders. The emergency coordinators carry a key to this gate.

6.0 ARRANGEMENTS WITH LOCAL AND STATE EMERGENCY RESPONSE PERSONNEL (40 CFR 264.52(C))

UOR has conducted tours of the transfer facility for representatives of the Newington Fire Department to familiarize them with the layout of the facility, the wastes handled at the facility, the places where facility personnel would normally be working, entrances to the facility, and possible evacuation routes.

Though the Newington, Portsmouth, and Dover Fire and Police Departments could respond in the event of an emergency, the Newington Fire and Police Departments provide the primary response. The Newington Fire Department has a mutual aid agreement with area towns through the Interstate Emergency Unit that provides support to the fire department as primary responder. The Newington Fire and Police Departments will be provided a copy of United Oil Recovery, Inc.'s Contingency Plan.

Portsmouth Regional Hospital will also receive a copy of this Contingency Plan so that they will be prepared to treat patients in an emergency situation.

7.0 EMERGENCY PROCEDURES (40 CFR 264.56)

Response activities shall be in conformance with 29 CFR 1910.120. In the event of a fire, explosion, or significant release, or the imminent danger of such situation, the Emergency Coordinator (or his alternate) shall:

7.1 Emergency Alert:

1. Using the Nextel system, notify facility personnel of the need to evacuate, specifying the evacuation location and the best route to access this location.
2. Notify the Fire Department, Police, State Emergency Response Team and/or Ambulance as appropriate. Phone numbers for the State and local emergency assistance agencies are listed in this Contingency Plan.
3. Identify the character, source, amount, and extent of any released materials.

4. Assess possible hazards to human health or the environment that may result from the emergency situation. In making this assessment, the Emergency Coordinator shall consider both direct and indirect effects, including hazardous gases or surface water runoff from the material used to control the fire or explosion. If such hazard is determined to exist, the Emergency Coordinator shall:
- Evaluate whether a local evacuation is advisable, and immediately notify the appropriate local authorities. The Emergency Coordinator will be available to help local officials decide whether local areas should be evacuated.
 - Immediately notify NH DES Waste Management Division (603-271-3899 for hazardous waste and 603-271-3644 for oil), the NH State Police (800-346-4009) and/or the National Response Center (800-424-8802). The notification shall include:
 - the name and telephone number of the reporter;
 - the name and address of the facility;
 - the time and type of incident;
 - the name and quantity of materials involved, if known;
 - the extent of injuries, if any; and
 - the possible hazards to human health or the environment outside the facility.

7.2 Contain the Problem:

- Cease all activities and if possible secure all transfer operations being conducted in the area of the emergency. After ceasing operations, monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment where appropriate.
- Make all reasonable attempts to contain the spill or extinguish the fire to prevent any further danger to persons or the environment, following the recommended procedures of the Emergency Response Guide, including donning appropriate personal protective equipment.
- If the release is outside of the Hazardous Waste Operations Area, immediately close the shut-off valves in the three stormwater drainage trenches.
- If the extent or location of the emergency prevents safely containing the spill or extinguishing the fire, isolate the problem to the extent possible until the Fire Department arrives.
- Upon the arrival of a Fire Department, advise the officer in command of the nature of the materials involved, unusual fire fighting or spill control techniques

and safety procedures. Provide the officer in command with any information that is requested pertaining to the materials and assist him as requested.

7.3 Follow-up Procedures:

Immediately after the emergency, the Emergency Coordinator shall:

- Provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.
- Ensure that incompatible waste does not come in contact with the released waste.
- Emergency equipment used during the emergency is cleaned up and readied for use or replaced before transfer operations resume in the affected area of the facility.
- Ensure that all hazardous waste has been cleaned up within 24 hours of the occurrence. If the hazardous waste discharge cannot be cleaned up with 24 hours of the occurrence, UOR will submit a clean up plan to the NH DES in accordance with Env-Hw 706.02.

Before resuming operations at the affected area of the facility, the owner/operator shall notify the appropriate state and local authorities that the release, fire, or explosion is remedied, and emergency equipment is again ready for use.

The owner/operator shall note in the facility's operating record the time, date, and details of any incident that requires implementing the Contingency Plan. He shall submit a written report of the incident to the NH DES within 15 days of the incident including the following information:

- the name, address, and telephone number of the owner/operator;
- the name, address, and telephone number of the facility;
- the date, time, and type of incident;
- the name and quantity of materials involved;
- the extent of injuries, if any; and
- an assessment of actual or potential hazards to human health of the environment if applicable; and

- the estimated quantity and disposition of recovered material that resulted from the accident.

It should be noted that minor releases and fires that can be extinguished with on-site extinguishers will not cause the full implementation of the Contingency Plan. The Emergency Coordinator or his alternate shall judge what level of implementation is appropriate based on the situation.

8.0 COPIES OF THE CONTINGENCY PLAN (40 CFR 264.53)

Copies of the Contingency Plan are maintained at the facility and have been submitted to the Newington Fire and Police Departments, Portsmouth Regional Hospital, and the NH DES Emergency Response Team.

9.0 AMENDMENT OF THE CONTINGENCY PLAN (40 CFR 264.54)

This plan will be reviewed and amended, if necessary, whenever the facility permit is revised, the plan fails in an emergency, the facility changes in some way that materially increases the potential for fires or releases of hazardous waste constituents, or changes occur affecting the response measures that are required in an emergency. It will also be amended if the list of emergency coordinators changes or the list of emergency equipment changes substantively.

Section 7: Employee Training Program

Because the United Oil Recovery, Inc. facility is also a hazardous waste transfer facility, UOR adheres to a training program to prepare persons to operate or maintain a hazardous waste management facility in a safe manner. The requirements of this training program provide ample training for operators to conduct hazardous as well as solid waste operations at the facility. In fact, it is often the same people who are conducting both operations. Specific to the solid waste operations, UOR operators are trained and certified per Solid Waste Rule Env-Sw-1600 "Solid Waste Facility Operator Training and Certification". The training and certification program is currently managed by the New Hampshire Department of Environmental Services. Because UOR operators can handle asbestos as well, they will train per EPA requirements to be an asbestos control professional.

In accordance with 29 CFR 1910.120 (OSHA Hazardous Waste Operations and Emergency Response regulations), personnel at United Oil Recovery, Inc. who are involved with hazardous waste operations will receive either 24 or 40 hours initial training and 8 hours of refresher training annually, thereafter.

Training Outline

The four elements of personnel training critical to safe hazardous and solid waste management, are as listed below.

Personnel Safety Training

- Hazards and characteristics of chemical/other wastes;
- Selection and use of protective clothing and equipment for emergency situations; and
- Health effects of chemicals in the work environment.

Emergency Planning

- Emergency response; and
- Contingency planning.

Facility Operations and Maintenance

- Hazard minimization through proper facility operations and maintenance.

Maintaining Records

- Regulatory compliance.

Personnel activities related to hazardous and solid waste are distinguished between routine day-to-day waste handling, storage, and treatment operations and emergency response activities in accordance with the Contingency Plan.

The training course encompasses the four elements listed previously for safe waste management. Emergency response training is conducted in accordance with the site-specific Contingency Plan. Personnel having a role in the Contingency Plan will be trained in his/her specific duties per the Contingency Plan. It is anticipated that some minimum level of training in emergency response procedures should be administered to all persons who will be on-site. In many cases this training

will be limited to evacuation procedures. Some individuals, however, must be trained in specific activities depending upon the type and extent of emergency; (e.g., reporting of the event to the proper individuals and departments, and implementation of mitigative measures).

Facility personnel involved in handling waste will be trained in aspects of hazardous and solid waste management pertinent to the facility. The Training Program is designed to provide facility personnel with the necessary background and perspective for the safe conduct of the facility's waste operations. This level of instruction is comprehensive and constitutes a detailed overview of pertinent aspects of hazardous materials and hazardous and solid waste management.

Training Staff

Either internal corporate/facility staff or a third party trainer will conduct initial and continuing training of personnel at UOR. An internal staff's requirements to be a trainer would be a minimum of 5 years experience in the environmental field (not necessarily with the company). A college degree with a major in a relevant topic (e.g., science, engineering, etc.) can be substituted for the experience on an individual basis. Examples of some internal staff who are capable of performing training are the corporate President or Vice President, corporate Environmental Director, corporate Field Services Manager, corporate EHS Manager, corporate Operations Manager, and facility Plant Manager. This list is not exhaustive. There are many qualified third party trainers who perform RCRA/OSHA training. The trainer's level of experience and background vary, but for the most part they are people who have worked in the waste or chemical industry or who were/are firefighters or other emergency responders. UOR does not have set criteria for choosing these trainers, other than a case-by-case judgment based on qualifications, reputation, and past training experience with UOR.

Safety and Other Training

OSHA 24 and 40 HAZWOPER training includes topics such as hazardous materials identification, personal protective equipment selection and use, respiratory protection including a respirator fit test, and basic toxicology. Operations and laboratory personnel (includes all staff except clerical) receive initial HAZWOPER training of 24 or 40 hours and an 8-hour annual refresher. Personnel who are involved in the shipping papers (clerical staff and possibly others) receive hazardous and non-hazardous waste manifest (i.e., RCRA and non-RCRA) and DOT training.

Contingency Planning

Personnel are trained in relevant aspects of the Contingency Plan for the facility. Special attention is placed on notifications, evacuations, and response to spills. UOR does not train employees in firefighting. The Contingency Plan is included as Section 6 of this Operating Plan. Please reference this section to view the contents of what would be taught during Contingency Plan training.

Facility Operations/Maintenance

New operations staff members train with experienced operators on-the-job to learn the various systems and equipment found at the facility. This training includes such tasks as unloading and transfer operations, drum handling, solidification in the processing units (pits), and product loading and transfer operations. The experienced operator and Plant Manager determine when

the new staff member has demonstrated adequate competence to work on his or her own. This will be done in concert with having the individual achieve his/her state Solid Waste Facility Operator Training and Certification and EPA asbestos certification if the person will handle asbestos.

Recordkeeping

Training records for current personnel will be kept on file until closure of the facility. Training records for former employees are kept on file for a minimum of three years from the date their employment terminated. Training records consist of a completion certificate for the 24 or 40-hour HAZWOPER course, an attendance sheet or certificate for the completion of an 8-hour HAZWOPER refresher course, a certificate certifying completion of Solid Waste Facility Operator Training, and an attendance sheet or other written record for all other trainings.

Section 8: Recordkeeping and Reporting

Much of the recordkeeping and reporting procedures have been presented within the previous sections based on the area discussed. In addition to these requirements, UOR shall prepare and submit to NH DES a Solid Waste Annual Report per Env-Sw-1105.13. The recordkeeping and reporting requirements found in the Solid Waste Rules (Env-Sw 1105.06, 1105.07, and 1105.09) shall be followed by United Oil Recovery, Inc.

Section 9: Public Benefit

Pursuant to Env-Sw-405.04 and 505.08, United Oil Recovery, Inc. shall meet the following requirements.

- Irrespective of the source of the waste, the amount of waste transferred to New Hampshire landfills and incinerators shall not exceed the quantity of waste that UOR receives annually from New Hampshire generators. UOR currently ships a minimal amount of waste to NH landfills or incinerators.
- UOR is not in the business of handling recyclable materials which would require separation and shipment to recycling facilities, thereby avoiding those materials ending up in a lined landfill with a leachate collection system.

UOR shall follow the requirements of Env-Sw-1105.12 Interactions with Districts. Specifically, UOR shall annually communicate with the Lamprey Regional Solid Waste Cooperative to assure that:

1. Operating requirements established for the facility are being met; and
2. Facility operations meet other relevant planning needs and requirements identified or established by the district (if any exist), to the extent allowed by the permit.

The communication may be provided by sending the district chairperson a copy of the facility's annual report with a cover letter identifying the purpose of the communication and soliciting a response by district officials concerning the requirements listed above. Other forms of communication may be used to satisfy the above requirements as well.

**United Oil Recovery, Inc.
Solid Waste Operating Plan**

Attachment 1

Waste Characterization Profile Form



UNITED OIL RECOVERY, INC.
136 Gracey Ave.
Meriden, CT 06451-(203) 238-6751

BRIDGEPORT UNITED RECYCLING, INC.
50 Cross Street
Bridgeport, CT 06610

UOR USE ONLY

New Update
Profile #
Sample Arrival Date

WASTE STREAM PROFILE SHEET

| GENERATOR | | CUSTOMER (BILLING ADDRESS) | |
|-------------------|--|----------------------------|----------------------------|
| Site Name | | Name | United Industrial Services |
| Address | | Address | Sales Rep Name |
| Mailing Name | | Contact | Phone # |
| Address | | Fax # | Fax # |
| TRANSPORTER | | | |
| Technical Contact | | Name | United Industrial Services |
| Shipping Contact | | Address | 136 Gracey Avenue |
| Phone # | | Contact | Meriden, CT 06451 |
| EPA ID # | | Phone # | 888-276-0887 |
| | | EPA ID # | CTD021816889 |

WASTE DESCRIPTION

| | | | | |
|--------------------------------------|---------------------------------------|-----|--|-------|
| Chemical & Physical State* | | pH | Please submit a one (1) quart representative sample of the waste stream. Describe the sampling method below. | |
| <input type="checkbox"/> Liquid | <input type="checkbox"/> Multilayered | 2-4 | 8-10 | Odor |
| <input type="checkbox"/> Semi-Liquid | <input type="checkbox"/> BIlayered | 4-6 | 10-12 | TSS |
| <input type="checkbox"/> Solids | <input type="checkbox"/> Single Phase | 6-8 | >12 | Color |

Process Description -

CHEMICAL CONSTITUENTS

| Petroleum Phase | Suspected Levels (UOR use only) | Actual Levels (UOR use only) | Aqueous Phase | Suspected Levels | Actual Levels (UOR use only) | Suspected Levels | Actual Levels (UOR use only) | This waste is: | RCRA Number(s) |
|-----------------|---------------------------------|------------------------------|---------------|------------------|------------------------------|------------------|------------------------------|--------------------------------------|----------------|
| PCBs | | | Copper (Cu) | | | Selenium (Se) | | RCRA Listed | |
| Halogens | | | Cadmium (Cd) | | | Mercury (Hg) | | State Regulated | |
| Solvents | | | Chromium (Cr) | | | Cyanide (CN) | | Non-Regulated | |
| Arsenic (As) | | | Lead (Pb) | | | Iron (Fe) | | Virgin Material | |
| Cadmium (Cd) | | | Nickel (Ni) | | | pH | | Notes & special handling information | |
| Chromium (Cr) | | | Silver (Ag) | | | Phenols | | | |
| Lead (Pb) | | | Zinc (Zn) | | | | | | |

Please list Specific Solvents:

| SHIPPING INFORMATION | |
|----------------------------------|----------------------------|
| DOT Hazard Class / Packing Group | DOT Regulated |
| DOT Shipping Name | UN/NA Number |
| Additional Description | Amount of Waste / Shipment |
| | Frequency of Shipment |
| | Non-Regulated |

The undersigned certifies that all above information is true and accurate to the best of his/her knowledge. The accompanying sample is representative of the waste stream described above. All potential hazards have been noted in the handling section. Shipments may not begin until this waste stream has been approved as treatable by United Oil Recovery, Inc. If at any time, the information above should change or if different shipments will cease until further approval is obtained from United Oil Recovery, Inc. The undersigned accepts full responsibility for any misrepresentation and any damage that the misrepresentation does to the client or reseller of United Oil Recovery, Inc. This will also certify that the waste stream described above does not contain Pesticides, Herbicides or any TSCA Polychlorinated Biphenyls (PCBs). It is understood by both the Generator and the Broker, that in the event of default of payment by the Broker, United and its affiliates reserve the right to pursue payment from the Generator.

FACILITY USE ONLY

| | |
|------------------|----------|
| Rec'd on | Rec'd By |
| Sample Container | |
| Approved By | |
| Comments | |
| M | B |

Signature X

Title X

Date: X

**United Oil Recovery, Inc.
Solid Waste Operating Plan**

Attachment 2

Examples of Inventory Tracking Reports

INBOUND BULK LOG

| PROFILE DESCRIPTION | APPROVAL CODES | SHIP/SAMPLE DATE | SAMPLE # | RECEIVED DATE | GENERATOR | QTY | UNIT | WASTE CODES | MANIFESTS | ON-SITE DESTINATION |
|------------------------------------|-----------------|------------------|------------|---------------|-------------------------------------|------|---------|-------------|---------------|---------------------|
| Fuel Oils (#2, 4, 6 or Diesel) | P041307036LH | 12/1/2010 | S120110097 | 12/1/2010 | Andover Newton Theological School | 670 | Gallons | MA98 | 000116298UIS | Tank: 3005 |
| Waste Engine Oil | P010408014CT | 12/1/2010 | S120110006 | 12/1/2010 | Ridgewood RI Gen LP (Phase 2) | 1260 | Gallons | None | UISA0208695 | Tank: 3005 |
| Mix Pit Solids | 1763HTP3RL | 12/2/2010 | S120210022 | 12/2/2010 | Environmental Compliance Corp. | 1799 | Gallons | MA01 | 000116321UIS | Pit: solids pit |
| Mix Pit Solids | 1763HTP3RL | 12/2/2010 | S120210175 | 12/2/2010 | Environmental Compliance Corp. | 1799 | Gallons | MA01 | 000116291UIS | Pit: solids pit |
| Cooling tower intake screen debris | P021408024SD | 12/2/2010 | S120210023 | 12/2/2010 | Newington Energy LLC | 100 | Gallons | None | UISA0311826 | Pit: solids pit |
| | P080707021LMSD, | | | | | | | | UISA0208694, | |
| Catch basin debris & water | P080707027LMSD | 11/30/2010 | S113010099 | 12/2/2010 | Prolerized N.E., dba Adv. Recycling | 212 | Gallons | None | UISA0208701 | Pit: solids pit |
| | P080707021LMSD, | | | | | | | | UISA0208694, | |
| Catch basin debris & water | P080707027LMSD | 11/30/2010 | S113010099 | 12/2/2010 | Prolerized N.E., dba Adv. Recycling | 200 | Gallons | None | UISA0208701 | Tank: 3005 |
| | | | | | | | | | 003763964FLE, | |
| Oily debris | 3547HSPMLMH | 12/1/2010 | S120110020 | 12/2/2010 | Safety-Kleen | 3100 | Gallons | None | 003845542FLE | Pit: solids pit |

INBOUND DRUM/CONTAINER LOG

| PROFILE DESCRIPTION | APPROVAL CODES | SHIP/SAMPLE DATE | SAMPLE # | RECEIVED DATE | DRUM # | GENERATOR | QTY | UNIT | MANIFESTS | WASTE CODES | ON-SITE DESTINATION |
|---------------------|----------------|------------------|------------|---------------|--------|----------------------------------|-----|---------|--------------|-------------|---------------------|
| Oil/solids | P111507022N45D | 11/30/2010 | S113010098 | 12/1/2010 | 130427 | Aggregate Industries | 55 | Gallons | UJSA03112938 | None | PIT solids pit |
| Waste newspaper ink | 0445KPT3 | 12/1/2010 | S120110041 | 12/1/2010 | 130481 | Globe Newspaper -North Billerica | 55 | Gallons | UJSA0311831 | None | PIT solids pit |
| Waste newspaper ink | 0445KPT3 | 12/1/2010 | S120110041 | 12/1/2010 | 130482 | Globe Newspaper -North Billerica | 55 | Gallons | UJSA0311831 | None | PIT solids pit |
| Waste newspaper ink | 0445KPT3 | 12/1/2010 | S120110041 | 12/1/2010 | 130483 | Globe Newspaper -North Billerica | 55 | Gallons | UJSA0311831 | None | PIT solids pit |
| Waste newspaper ink | 0445KPT3 | 12/1/2010 | S120110041 | 12/1/2010 | 130484 | Globe Newspaper -North Billerica | 55 | Gallons | UJSA0311831 | None | PIT solids pit |
| Waste newspaper ink | 0445KPT3 | 12/1/2010 | S120110041 | 12/1/2010 | 130485 | Globe Newspaper -North Billerica | 55 | Gallons | UJSA0311831 | None | PIT solids pit |
| Waste newspaper ink | 0445KPT3 | 12/1/2010 | S120110041 | 12/1/2010 | 130486 | Globe Newspaper -North Billerica | 55 | Gallons | UJSA0311831 | None | PIT solids pit |
| Waste newspaper ink | 0445KPT3 | 12/1/2010 | S120110041 | 12/1/2010 | 130487 | Globe Newspaper -North Billerica | 55 | Gallons | UJSA0311831 | None | PIT solids pit |
| Waste newspaper ink | 0445KPT3 | 12/1/2010 | S120110041 | 12/1/2010 | 130488 | Globe Newspaper -North Billerica | 55 | Gallons | UJSA0311831 | None | PIT solids pit |

OUTBOUND LOG

| PROFILE DESCRIPTION | APPROVAL CODES | SHIP DATE | QTY | UNIT | WASTE CODES | MANIFESTS | DESTINATION FACILITY |
|-------------------------------|--------------------------|-----------|------|---------|-------------|------------------------------|-------------------------------|
| Pit Sludge and Debris | P120909011 | 12/1/2010 | 3748 | Gallons | None | BOLA0150416 | NE Waste Services of VT, Inc. |
| Pit Sludge and Debris | P120909011 3203ELHLM, | 12/1/2010 | 3513 | Gallons | None | BOLA0150423 000116293UIS, | NE Waste Services of VT, Inc. |
| Non-Haz Waste Water | P061206001LM | 12/1/2010 | 1500 | Gallons | MA98 | 000116306UIS | Environmental Compliance Corp |
| Pit Sludge and Debris | P120909011 | 12/2/2010 | 3724 | Gallons | None | BOLA0150370370 | NE Waste Services of VT, Inc. |
| Oily solids | P112706005PT3 | 12/2/2010 | 3897 | Gallons | None | UISA0311778 | Maine Energy Recovery Company |
| Oily solids | P112706005PT3 | 12/2/2010 | 3862 | Gallons | None | UISA0311717 | Maine Energy Recovery Company |
| Pionite dust (virgin product) | P020707809 | 12/3/2010 | 2077 | Gallons | None | BOL1212769 | Bridgeport United Recycling |
| Pit Sludge and Debris | P120909011 | 12/3/2010 | 3831 | Gallons | None | BOLA0150427 | NE Waste Services of VT, Inc. |
| Oily solids | P112706005PT3 | 12/6/2010 | 3302 | Gallons | None | UISA0311801 | Maine Energy Recovery Company |
| Pionite dust (virgin product) | P020707809 | 12/7/2010 | 1199 | Gallons | None | BOL1213170 | Environmental Compliance Corp |
| Non-Haz Waste Water | P061206001LM | 12/7/2010 | 5000 | Gallons | MA98 | 000116324UIS | Environmental Compliance Corp |

OIL TRANSFERS

| Date | Transfer Tank | % Oil | % Water | % Rag | % Solids | Gallons Transferred | Safety-Kleen Receipt Tank |
|---------|---------------|-------|---------|-------|----------|---------------------|---------------------------|
| 1/5/11 | 3004 | 98 | 2 | 0 | 0 | 8157 | 3001 |
| 1/6/11 | 3004 | 98 | 2 | 0 | 0 | 10584 | 3003 |
| 1/13/11 | 3004 | 98 | 2 | 0 | 0 | 5543 | 3003 |
| 1/14/11 | 3004 | 98 | 2 | 0 | 0 | 7447 | 3001 |

**United Oil Recovery, Inc.
Solid Waste Operating Plan**

Attachment 3

**Solid Waste Facility
Daily and Annual Inspection Logs**

**United Oil Recovery, Inc. - Solid Waste Facility
Daily Inspection Log (page 1 of 3)**

Inspector's Name _____ Week of _____

Time of Inspection: Monday _____ Tuesday _____ Wednesday _____ Thursday _____ Friday _____

| Item | Types of Problems | Acceptable | | | | | Unacceptable | | | | | Observations - Date | Date & Nature of Repairs/Remediation |
|--|--|------------|---|---|----|---|--------------|---|---|----|---|---------------------|--------------------------------------|
| | | M | T | W | Th | F | M | T | W | Th | F | | |
| Solid Waste Area 1 | | | | | | | | | | | | | |
| Front Operations Area A | | | | | | | | | | | | | |
| Roll-Offs or Other Portable Tank Units (incl. frac tanks, vacuum boxes) & Drums/ Containers (incl. IBCs, totes, cubic yard boxes, T-packs) | Leaks, Spills, Corrosion, Deterioration, Open or Insecure Covers, Stored in Improper Location, Maximum Capacity Exceeded | | | | | | | | | | | | |
| Solid Waste Area 2 | | | | | | | | | | | | | |
| Rear of Dock | | | | | | | | | | | | | |
| Roll-Offs or Other Portable Tank Units (incl. frac tanks, vacuum boxes) & Drums/ Containers (incl. IBCs, totes, cubic yard boxes, T-packs) | Leaks, Corrosion, Deterioration, Open or Insecure Covers, Stored in Improper Location, Maximum Capacity Exceeded | | | | | | | | | | | | |
| Base/Foundation of Area | Leaks, Spilled Material, Asphalt Base or Berm Badly Broken or Potholed, Standing Water Impacting Waste Storage | | | | | | | | | | | | |
| Solid Waste Area 3 | | | | | | | | | | | | | |
| Processing Units (Pits) & Adjacent Loading/Offloading Areas | | | | | | | | | | | | | |
| Processing Units (Pits) | Too Much or Improper Waste in Units, Wastes Outside of Units | | | | | | | | | | | | |
| Oil Filter Processing | Oil Filters not Hot-Drained, Collected Oil Not Pumped by End of Each Business Day | | | | | | | | | | | | |

Repair problems immediately if a hazardous situation has occurred or is imminent. Otherwise, use best management practices in timing the repair.

United Oil Recovery, Inc. - Solid Waste Facility
Daily Inspection Log (page 2 of 3)

Inspector's Name _____ Week of _____

Time of Inspection: Monday _____ Tuesday _____ Wednesday _____ Thursday _____ Friday _____

| Item | Types of Problems | Acceptable | | | | | Unacceptable | | | | | Observations - Date | Date & Nature of Repairs/Remediation |
|---|---|---|---|---|----|---|--------------|---|---|----|---|---------------------|--------------------------------------|
| | | M | T | W | Th | F | M | T | W | Th | F | | |
| Solid Waste Area 4 Tanks 3004 & 3005 | | M | T | W | Th | F | M | T | W | Th | F | | |
| Tank Shells & Legs | Cracks, Corrosion, Deterioration | | | | | | | | | | | | |
| Pipes, Valves, Fittings, & Flanges | Leaks, Corrosion, Deterioration | | | | | | | | | | | | |
| High Level Alarms | Inoperative | | | | | | | | | | | | |
| Base/Foundation of Area | Spilled Material | | | | | | | | | | | | |
| Solid Waste Area 5 Dock/Vehicles | | INSPECTED ON HAZARDOUS WASTE INSPECTION LOGS | | | | | | | | | | | |
| Solid Waste Area 6 Back Operations Area | | INSPECTED ON HAZARDOUS WASTE INSPECTION LOGS | | | | | | | | | | | |
| Solid Waste Area 7 Loading/Offloading Pad | | INSPECTED ON HAZARDOUS WASTE INSPECTION LOGS | | | | | | | | | | | |
| Base/Foundation of Area | Leaks, Spilled Material, Concrete Base or Berm Badly Broken or Potholed | M | T | W | Th | F | M | T | W | Th | F | | |
| Equipment (hoses, pumps, connections) | Leaks, Corrosion, Deterioration, Inoperative | | | | | | | | | | | | |
| Solid Waste Area 8 Front Operations Area B | | INSPECTED ON HAZARDOUS WASTE INSPECTION LOGS | | | | | | | | | | | |
| General Storage Area | Improper Wastes Stored, Leaks/Spills, Other Environmental Conditions | M | T | W | Th | F | M | T | W | Th | F | | |
| Solidification Material | Dust Blowing, Mixing with Stormwater and Leaching, Not Properly Covered | | | | | | | | | | | | |

Repair problems immediately if a hazardous situation has occurred or is imminent. Otherwise, use best management practices in timing the repair.

**United Oil Recovery, Inc. - Solid Waste Facility
Daily Inspection Log (page 3 of 3)**

Inspector's Name _____ Week of _____

Time of Inspection: Monday _____ Tuesday _____ Wednesday _____ Thursday _____ Friday _____

| Item | Types of Problems | Acceptable | | | | | Unacceptable | | | | | Observations - Date | Date & Nature of Repairs/Remediation |
|--|---|------------|---|---|----|---|--------------|---|---|----|---|---------------------|--------------------------------------|
| | | M | T | W | Th | F | M | T | W | Th | F | | |
| General Facility | | | | | | | | | | | | | |
| Odor or Dusty Conditions (Authorized Wastes with potential to cause dust include ash, soils/media, and construction & demolition debris) | Presence of Odors or Dust | | | | | | | | | | | | |
| <u>Asbestos</u> Allowed for storage in: - Front Operations Area A - Rear of Dock - Dock/Trailers & - Back Operations Area | Not Stored in Permitted Location, Bags/Containers Not Sealed, Spills/Releases, Asbestos Handled by Untrained Staff, Signage Missing, Damaged, or Unreadable | | | | | | | | | | | | |
| Bypass Solid Wastes | Note Stored in Safe, Secure, or Environmentally Sound Location; Leaks, Spilled Material, Corrosion | | | | | | | | | | | | |

Repair problems immediately if a hazardous situation has occurred or is imminent. Otherwise, use best management practices in timing the repair.

Note that safety, emergency, and security equipment and systems are inspected as part of the Hazardous Waste Facility inspection logs.

SEE ATTACHED REFERENCE PAGE FOR AUTHORIZED SOLID WASTES, SOLID WASTES AREAS & WHICH WASTES ARE ALLOWED, & MAXIMUM CAPACITIES ALLOWED PER AREA

SOLID WASTE INSPECTION LOG REFERENCE PAGE

Authorized Solid Wastes:

1. Non-terne-plated hot-drained used oil filters
2. Non-hazardous oily and non-oily wastewater
3. Contaminated septic wastewater (contaminated with oil or other non-hazardous solid wastes not usually found in septic wastewater)
4. Industrial wastewater treatment plant sludge (not municipal sludge from POTWs)
5. Construction and demolition debris
6. Asbestos
7. Ash
8. Contaminated soils and media
9. Over the counter and prescription pharmaceuticals that are also non-controlled substances
10. Non-TSCA PCB contaminated solid wastes
11. Household non-hazardous wastes (household hazardous wastes would be acceptable under the hazardous waste transfer permit)
12. Empty used drums/containers (metal, plastic, other) and expended fire extinguishers
13. Non-hazardous aerosols and other compressed gases (these waste gases may be classified as DOT Class 2, Division 2.2 (non-flammable))
14. Non-hazardous DOT Class 6, Division 6.1 poisonous materials assigned to Packing Group II or III
15. Non-hazardous non-infectious waste from medical facilities
16. Scrap plastic and metal (drums/containers, tanks, other)

| Solid Waste Area | Maximum Solid Waste Storage Capacity | Authorized Solid Wastes Allowed in Area |
|---|---|--|
| Solid Waste Area 1 Front Operations Area A | 600 cubic yards plus excess if dock is not full | 1-16 |
| Solid Waste Area 2 Rear of Dock | 600 cubic yards plus excess if dock is not full | 1-16 |
| Solid Waste Area 3 Processing Units (Pits) & Adjacent Loading/Offloading Areas | 154 cubic yards (77 cubic yards per unit) | 1, 3, 4, 7, 8, 10, 11, 12, & 15 |
| Solid Waste Area 4 Tanks 3004 & 3005 | 78,000 gallons (39,000 gallons per tank) | 2 & 3 |
| Solid Waste Area 5 Dock/Trailers | 38,720 gallons | 1-16 |
| Solid Waste Area 6 Back Operations Area | 600 cubic yards plus excess if dock is not full | 1-16 |
| Solid Waste Area 7 Loading/Offloading Pad | None | 2 & 3 |
| Solid Waste Area 8 Front Operations Area B | None | 12 & 16 |

NOTES: 1. When the hazardous waste dock is used, the full volume of hazardous and solid waste stored in trailers/trucks at the dock shall not exceed 38,720 gallons.

2. The Back Operations Area may also be used to store up to 10 hazardous waste roll-offs or other portable tank units. Therefore the total in this area may be 600 cubic yards of combined hazardous and solid waste.

**United Oil Recovery, Inc. - Solid Waste Facility
Annual Inspection Log (page 1 of 1)**

Inspector's Name _____ Date _____

| Item | Types of Problems | Acceptable | Unacceptable | Observations - Date | Date & Nature of Repairs/Remediation |
|---|--|------------|--------------|---------------------|--------------------------------------|
| Solid Waste Area 3 Processing Units (Pits) Annual confined space entry and cleaning of each processing unit to inspect the structural integrity of the units including the oil resistant membrane | Membrane Worn or Missing In Spots Possibly Exposing the Concrete, Structural Damage From Weight or Heavy Equipment Use | | | | |

**Repair problems immediately if a hazardous situation has occurred or is imminent.
Otherwise, use best management practices in timing the repair.**

**United Oil Recovery, Inc.
Solid Waste Operating Plan**

Attachment 3

**Hazardous Waste Transfer Permit
Inspection Logs**

United Oil Recovery, Inc. - Daily Inspection Log (page 1 of 2)
Transfer Dock

Inspector's Name _____

Week of _____

Time of Inspection: Monday _____ Tuesday _____ Wednesday _____ Thursday _____ Friday _____

| Item | Types of Problems | Acceptable | | | | | | | Unacceptable | | | | | | | Observations - Date | Date & Nature of Repairs/Remediation | | |
|--|---|------------|---|---|----|---|---|---|--------------|----|---|---|---|---|----|---------------------|--------------------------------------|---|--|
| | | M | T | W | Th | F | M | T | W | Th | F | M | T | W | Th | | | F | |
| Transfer Dock - Hazardous & Solid Waste Staging/Storage | | | | | | | | | | | | | | | | | | | |
| Floor/Walls Inside Trailers | Leaks, Spilled Material | | | | | | | | | | | | | | | | | | |
| Staging Dock Outside of Trailers | Leaks, Spilled Material, Accumulated Liquid | | | | | | | | | | | | | | | | | | |
| Asphalt Base/Foundation | Leaks, Spilled Material, Accumulated Liquid | | | | | | | | | | | | | | | | | | |
| Staging Time (Drum Labels & Inventory) | >10 Calendar Days (hazardous waste only) | | | | | | | | | | | | | | | | | | |
| Storage Capacity | Exceeds 38,720 gallons (total hazardous and/or solid waste) | | | | | | | | | | | | | | | | | | |
| Sealing of Drums/Containers | Open or Insecure Covers | | | | | | | | | | | | | | | | | | |
| Drums/Containers | Leaks, Corrosion, Deterioration, Do Not Meet DOT Compatibility Requirements | | | | | | | | | | | | | | | | | | |

Repair problems immediately if a hazardous situation has occurred or is imminent. Otherwise, use best management practices in timing the repair.

United Oil Recovery, Inc. - Daily Inspection Log (page 2 of 2)
Back Operations Area, Security, & Safety/Emergency

Inspector's Name _____

Week of _____

Time of Inspection: Monday _____ Tuesday _____ Wednesday _____ Thursday _____ Friday _____

| Item | Types of Problems | Acceptable | | | | | Unacceptable | | | | | Observations - Date | Date & Nature of Repairs/Remediation |
|---|--|------------|---|---|----|---|--------------|---|---|----|---|---------------------|--------------------------------------|
| | | M | T | W | Th | F | M | T | W | Th | F | | |
| Back Operations Area Hazardous & Solid Waste Staging/Storage | | M | T | W | Th | F | M | T | W | Th | F | | |
| Roll-Offs or Other Portable Tank Units (incl. frac tanks, vacuum boxes) & Drums/Containers (incl. IBCs, totes, cubic yard boxes, T-packs) | Leaks, Corrosion, Deterioration, Open or Insecure Covers, Staging Time >10 Days (hazardous waste only) | | | | | | | | | | | | |
| Storage Capacity | Exceeds 600 cubic yards plus excess solid waste if dock is not full (maximum of 300 cubic yards hazardous waste) | | | | | | | | | | | | |
| Base/Foundation of Area | Leaks, Spilled Material | | | | | | | | | | | | |
| Security | | M | T | W | Th | F | M | T | W | Th | F | | |
| Facility Gate on Shattuck Way (not Sprague's) | Unlocked When Not In Use, Damaged | | | | | | | | | | | | |
| Safety & Emergency | | M | T | W | Th | F | M | T | W | Th | F | | |
| Evacuation Routes | Obstructed | | | | | | | | | | | | |

**Repair problems immediately if a hazardous situation has occurred or is imminent.
 Otherwise, use best management practices in timing the repair.**

United Oil Recovery, Inc. - Weekly Inspection Log (page 1 of 1)
Transfer Dock & Safety/Emergency

Inspector's Name _____

Date/Time of Inspection _____

| Item | Types of Problems | Acceptable | Unacceptable | Observations | Date & Nature of Repairs |
|--|---|------------|--------------|--------------|--------------------------|
| Transfer Dock | | | | | |
| Asphalt Base/Foundation | Cracks, Sprawling, Uneven Settlement, Wet Spots, Wear | | | | |
| 2 Stormwater Collection Tanks | Covers Not Sealed, Full, Leaks, Releases | | | | |
| 2 Collection Trenches | Not Flowing, Clogged | | | | |
| Safety & Emergency | | | | | |
| Eyewashes | Damaged, Missing, Not Accessible | | | | |
| Goggles/Glasses/Facemasks | Broken, Dirty, Out of Stock | | | | |
| Respirators/Cartridges | Broken, Dirty, Out of Stock | | | | |
| Overpack & Empty Drums | Out of Stock, Structural Damage | | | | |
| Telephone System | Power Failure, Inoperative | | | | |
| Direct Communication Devices (i.e., Nextels) | Operational | | | | |

Repair problems immediately if a hazardous situation has occurred or is imminent. Otherwise, use best management practices in timing the repair.

United Oil Recovery, Inc. - Monthly Inspection Log (page 1 of 1)
Security & Safety/Emergency

Inspector's Name _____ Date/Time of Inspection _____

| Item | Types of Problems | Acceptable | Unacceptable | Observations | Date & Nature of Repairs |
|---|---|------------|--------------|--------------|--------------------------|
| Security | | | | | |
| Floodlights | Operational | | | | |
| Warning Signs on Exterior Fences | Missing, Damaged, Overall Condition | | | | |
| Safety & Emergency | | | | | |
| Absorbent Material (e.g., Speedi Dri, sausage boom, pads) | Damaged, Out of Stock | | | | |
| Fire Extinguishers | Needs Recharge, Accessible, Seals/Tamper Indicators Intact, Tagged as Serviced Within Last Year | | | | |
| Gloves and Boots | Damaged, Out of Stock | | | | |
| First Aid Equipment | Damaged, Out of Stock | | | | |
| Shovels and Squeegees | Damaged, Out of Stock | | | | |
| Cloth and Tyvek Coveralls | Damaged, Out of Stock | | | | |
| 4-Way Confined Space Entry Meter | Inoperative | | | | |
| Vacuum Truck | Inoperative, No Vacuum | | | | |

Repair problems immediately if a hazardous situation has occurred or is imminent. Otherwise, use best management practices in timing the repair.