

TUCSON/PIMA COUNTY
HOUSEHOLD HAZARDOUS WASTE PROGRAM

ENVIRONMENTAL SERVICES
2440 W. Sweetwater Drive
Tucson, AZ. 85705

FACILITY AUDIT REPORT

Source Audit #: FA13-001

Date: 06-13-13

Inspector: F. Bonillas

Source: Clean Harbors

Location: 2247 S. Hwy 71, Kimball, Nebraska 69145

Arrival Time: 9:45 a.m.

Departure time: 6:00 p.m.

Photographs: Yes

Samples: No

Reason for inspection: Facility Audit

Inspection Type: Announced Unannounced

GENERAL INFORMATION:

Name and title of official(s): Ms. Jessica E. Grow, Compliance Specialist 308.235.8260
Mr. Curt W. Lock, Account Manager 408.451.5000

Facility Description

Clean Harbors Environmental Services operates a hazardous waste storage, treatment, and disposal facility (TSDF) located in Kimball, Nebraska. The Kimball facility is a RCRA-permitted, commercial facility for treatment, storage and disposal of hazardous waste. Household hazardous waste (HHW) materials collected by the Tucson/Pima County HHW Program are packaged and shipped through the Clean Harbors TSDF located in Phoenix, Arizona. HHW materials are transported to the Phoenix facility for 10-day storage or transported directly to the Kimball facility. Waste materials stored at the Phoenix facility can also be shipped to the Kimball facility.

The Kimball facility is located on Highway 71, five miles South of Interstate 80. It is located primarily among ranching and farmland. The facility perimeter is secured by fencing and gates. The property consists of 640 acres but the facility footprint is only 80 acres. The entrance and surrounding property is lush with vegetation and animals. Additional facility descriptive is included in the completed TSDF Audit Questionnaire Form.

The Kimball facility includes a fluidized-bed incinerator for thermal destruction of hazardous waste, a monofill for disposal of delisted ash, and an analytical laboratory for waste analysis. This facility also receives hazardous waste for temporary storage (90-day) that may be shipped to other TSDF facilities for off-site treatment. Stack gas emissions from the fluidized-bed incinerator are continuously monitored by the Nebraska Department of Environmental Quality (NDEQ) and monitor operations by conducting on-site inspections. The residual ash from the incinerator is delisted and disposed of on-site in a RCRA Subtitle C monofill. The Kimball facility is an Occupational Safety and Health (OSHA) Voluntary Protection Program (VPP) Merit participant. VPP Merit facilities embrace exemplary safety practices by both management and employees.

The Kimball facility thermally treats liquid, sludge and solid non-hazardous and hazardous waste. Typical waste streams include petroleum hydrocarbon contaminated soils, halogenated and non-halogenated organic (solvent) waste sludge and liquids, residues from the chemical process industry, paint residues, contaminated process wastewaters, and chemical spill cleanups. A complete list of waste streams included in Facility Audit: Kimball, NE. The fluidized-bed thermal oxidation unit operates at 99.99 percent destruction and the off gas is treated for acid gas, mercury, dioxin, and particulate removal. This facility consists of a variety of chemical receiving and storage buildings, chemical tank farm, support buildings, administration buildings, treatment systems, and a monofill. All facility components are identified by "Areas" and are described below as part of the facility walk-through inspection.

Facility Walk-through Inspection

Upon arrival, Ms. Jessica Grow, Compliance Specialist, assisted with security check-in and clearance. Strict security procedures are followed at the entrance by security personnel. Ms. Grow lead us to the administration building conference room to begin the audit interview. It was mutually decided to first complete the facility walk-through inspection to be followed by a review of facility documents and pertinent records.

Truck Scale

All trucks enter the Kimball facility through the security gate and are weighed at the truck scale. Bulk liquid trucks proceed to the Sample/Warming Bays and trucks carrying containerized on-bulk wastes proceed to the receiving warehouse docks or a separate concrete pad staging area.

Sample/Warming Bays (Area 20)

After weighing bulk shipments enter the Sample/Warming building, which consists of four (4) bays. Waste samples are taken and sent to the laboratory before accepting the waste. Because of the cold winter weather, truck loads may be warmed to assist in the sampling process. All samples are taken randomly. This area is also equipped to control leaking bulk containers. This area was visually clear of any debris outside the bays.

Truck Wash Bay (Area 20)

The truck wash bay is also located in Area 20. Trucks that need to be washed to remove waste materials from the exterior of the trucks or bulk containers are washed in this bay. Wash water is collected, sampled, and transferred for on-site incineration. A carbon absorption system collects fugitive volatile compounds from this bay, which is inspected weekly. Operations are inspected daily. This area was visually clear of any debris outside the bays.

Oxidizer Building (Area 57D)

The oxidizer building, consisting of fully enclosed metal walls and roof, is elevated above ground level but is fully built as a secondary containment area. Oxidizers are stored on two tall racks with additional secondary containment tubs under the stored drums and packages. This building is equipped with a fire suppression system and eye and shower safety stations on opposite ends of the building. Waste materials were properly labeled, neatly organized, no apparent waste collected inside the containment tubs, and no debris was observed throughout the buildings secondary containment. The fire suppression system and eye and shower safety stations are inspected monthly. Oxidizers are only temporarily stored at this facility for off-site treatment.

Characterization Laboratory (Area 57L)

A small fingerprinting laboratory located outside the oxidizer building consists of a modular building. This lab only analyzes random samples pulled from non-bulk containers/packages received. The working surfaces in this modular were dusty. It was recommended that more frequent housekeeping be implemented.

Waste Storage and Container Management (Area 57A & 57B)

Non-bulk containers are off-loaded from dock bays, manifests processed, and conformance/fingerprinting sampling is performed in this staging building. This metal building is fully enclosed and is a secondary containment building. North dock is for incoming waste and South dock is for outgoing waste. Additional dedicated grated sumps on the floor may collect spilled waste materials by hazard classes. Containers approved for storage are transferred to Area 57B, an adjacent compartment to this building, to be incinerated on-site. Non-conforming containers are held until manifest discrepancies or waste classifications are resolved. These buildings are equipped with eye and shower safety stations, warning signs and a fire suppression system. Storage racks are numbered by pH. Storage containers are properly labeled, well organized, no apparent waste spilled on floors or in containment system, and no debris was observed throughout the building. Upon visual inspection good housekeeping practices are employed. Ms. Grow indicated floors are mopped daily.

Thaw Building (Area 57F)

Frozen bulk waste containers are thawed in the building's bays. This metal building is fully enclosed and has sloped dedicated secondary containment sumps to collect spilled waste or wash water. Frozen containers are thawed prior to entering the shredding building but leaking containers are also handled and contained here for immediate transfer to the shredding building.

Stormwater/Groundwater Monitoring wells

The Kimball facility has 23 monitoring wells (deep and shallow) throughout the property to monitor the groundwater. A sampling plan has been established and no groundwater contamination has been detected. Annual rain fall in this area is minimal, only 3 inches were recorded in the previous quarter, but all rain water is directed into a sump system where it is sampled, recovered and fed into the thermal oxidizer. All exposed concrete areas which have contact with waste materials are sloped into the sump system. There are three outfall areas that can be sampled but because of the low rains only one (1) outfall produces enough run-off where samples are taken. The well heads are secured, covered and labeled.

Bulk & Non-bulk Waste Staging (Area 25)

Waste received and approved for incineration is temporarily staged and stored on a large concrete pad before entering the processing area (shredder). These materials are properly labeled. This area is well maintained. No visible debris or spills were noted.

Waste Processing Building (Area 55 – Shredder)

Solid waste streams (containers) are fed into the processing building through a conveyor system. The containers enter an elevator where they are transported/dropped into the top of the hopper. Other bulk materials may be directly dropped into the hopper using an overhead crane/clamshell. Containers/materials are shredded and metal separated. The shredded materials are transferred using the overhead crane/clamshell into 1 of 2 mixing concrete sumps. The materials are mixed with waste soils and saw dust to the desired consistency. This waste is then transferred onto roll off boxes for transfer to the incinerator. This building is operated under negative air pressure and the air is transferred through an air handling system and fed directly into the incinerator. Currently the metal is being shipped off-site to a hazardous waste landfill. A new process is being designed and permitted to recycle all metal on-site.

Bulk (Roll Off) Waste Staging/Storage (Area 50)

Waste materials from the shredder are staged and stored before entering the incinerator. This is a 90-day storage area.

Thermal Oxidation Unit (Area 45)

Waste materials from the roll off containers are placed onto a conveyor system using an overhead crane/clamshell leading to the top of the incinerator hopper. Air from the processing area enters on the side of the incinerator and the tank farm also feeds liquid wastes into the incinerator. The fluidized-bed incinerator media is a silica based molten media operated between 1400-1600 degrees and is continually operated with only semi annual shut downs for scheduled maintenance. The off-gas is treated through a spray dryer absorber with cooling water and lime to adjust the pH from an acidic state. Mercury and dioxins are also treated through the spray dryer. The gas then enters a 6 unit baghouse system to remove particulate matter (fly ash). The fly ash is conveyed to storage tanks for delisting testing. The exhaust treated gas is exhausted through the stack. No visual fugitive emissions were observed from Area 45 and no spills or leaks were observed from this area. The stack was only exhausting air and water moisture.

Tank Farm (Area 70)

The tank farm consists of eight (8) storage 20,000 gallon tanks. These tanks store hazardous waste and feed the incinerator. The tank farm is equipped with secondary containment. No apparent spills or liquid waste were observed in the secondary containment. Stormwater from the secondary containment is collected, stored, tested and fed through the incinerator.

Ash Day bins (Area 80)

Ash is stored in temporary bins while analytical results are completed for delisting. This is a dusty process.

Ash Stabilization and Storage Building (Area 85)

Ash from the day bins is consolidated/stored in this building. Bed media and stabilization products are also stored in this area. Delisted ash is consolidated into large bins that are transferred to the on-site monofill. Ash is kept moist to control fugitive emissions. Ash and bed media that fails delisting is stabilized and must be shipped off-site to a Subtitle C landfill in Colorado. Soil testing is performed regularly in five (5) locations around the ash processing areas. Two (2) sites are tested quarterly and all five (5) sites are tested every five (5) years.

Monofill

The monofill is permitted as a Subtitle C landfill but is operated as a Subtitle D landfill. Only delisted ash and bed media is landfilled on-site. The monofill has capacity for six (6) cells. Cell #1 has capacity of 87,000 gallons. This cell is filled and capped. Cells #2-6 have capacity of 127,000 gallons. Cells #2 and #4 are filled and capped. Cell #5 is currently in use. Cells #3 and #6 are not yet built. The cells in use are lined and are equipped with a leachate collection system. A daily alternative cover is used that cakes the ash surface to prevent wind blown emissions.

Evaporation Pond

A lined evaporation pond is operated for the recovered leachate from the monofill. Leachate is tested quarterly. Permit limits have not been exceeded. Sediment samples are also taken annually. Sediment meets permit limits. Two (2) groundwater wells are located in the monofill and pond areas.

Control Room

The control/clean room maintains all facility operations.

Analytical Laboratory (Area 10)

Process samples are tested in-house. The laboratory is NELAC accredited and audited every two (2) years. Compliance samples are not completed in-house. All compliance testing is completed by a 3rd party laboratory. Laboratory is well maintained and organized. Personnel were wearing required PPE.

Inspection Interview and Documents Review

An inspection interview and documents review was completed after the site walk-through. The Treatment, Storage, Disposal Facility (TSDF) Audit Questionnaire Form was completed (attached). Various Kimball Facility operating documents were reviewed, including the Part B RCRA Permit, Title V air permit, Personnel Training Plan and training records, Operations Inspection Plan and daily and monthly inspection check lists, Emergency Contingency Plan and updated emergency contact list, shipping documents (manifests), NPDES permit and stormwater pollution prevention plan (PPP), and financial and insurance documents (attached).

Applicable Kimball facility permits listed in completed Pre-Audit Questionnaire (attached) and Facility Audit: Kimball, NE (attached) previously submitted by Clean Harbors.

A review of previous regulatory inspections and compliance violations was completed. A summary of violations dating from April 2004 to the present is attached. The Kimball facility has a variety of violations that have been satisfactorily resolved with the respective regulatory agencies.

A hazardous materials waste shipment received by the Kimball facility was verified to ensure the shipment was properly received and the manifest was in order.

Waste Records

Tucson/Pima County HHW Program

2440 W. Sweetwater Drive

Tucson, AZ 85705

Manifest: NONHAZ121311A

Waste Shipped: Paint Sludge, UN1263, 3, PGIII

Date Shipped: 4/24/13

Date Received: 4/29/13

The documents review overall was satisfactory. The disposal document/manifest reviewed was confirmed. The walk-through inspection revealed no deficiencies with reference to applicable permit requirements. The Kimball facility is closely monitored by the Nebraska Department of Environmental Quality (NDEQ).



Frank Bonillas
ES Superintendent

TREATMENT

STORAGE

DISPOSAL

FACILITY

AUDIT QUESTIONNAIRE FORM

FOR: Kimball Ocean Harbors, Kimball, ME

LOCATED: 2277 South Highway 71
Kimball, ME 09145

PHONE # 308-235-8212 FAX #

CONTACT (S) Danielle Treadwell
Jessica Grow, Compliance Specialist

AUDIT DATE (S) June 13, 2013

GENERAL INFORMATION

History of site:

Year current operation began Pre-audit questionnaire
Previous owner(s) dates

Previous use: Farm/Ranch land

Environmental problems caused by: None

Describe problem and how remediation is being accomplished? n/A

Proximity to:

Residences: 1-mile

Farmland 1-mile

Waterways: 7-mile Lodge pool creek
12-mile Otter Reservoir / Recreation Pond.
Any waterways drinking water source; distance: On-site drinking water well
1-mile.

Wetlands None.

Public facilities 5-mile to town (Kimball)

Schools: 5-mile

Flood Plain: None ever flooded?

Private Drinking water wells: Farms nearby > 1 mile (~3 mile)

Public Drinking water wells: > 5 mile City owned.

Wastes not accepted:

Any future modifications planned? New tank farm for storage to consolidate for off site disposal. Hydropulper to mix sludge. Metals recycling of metals from shredder waste.

Life expectancy: 13 yrs left - 30 years total.

Any other off-site facilities utilized for additional treatment, disposal and/or recycling of H.W. generated by the facility?

Deer Trail Colorado, Subtitle C Haz waste landfill (Metals, Ash (faked), Sintered silica media (faked) for metals)

SITE DESCRIPTION

Size: 640 Acres - 80 Acres active.

Topography: Flat / farmlands - rolling hills

Hydrogeology No surface water / Ogallala and Brule aquifers

Surface to water depth 145'-short 185'-deep

Run-on/run-off controls All concrete is controlled and rainwater collected.

Prevailing winds NW to SW 3 outfalls under NPDES Permit.

OSERVATIONS

Plant life health: Good

Animals: Deer, rabbits, birds, rodents, snakes

Liquids coming from plant None

Fencing, signs, condition: Perimeter fencing w/ warning signs in good condition.

Air emissions: None

Odors: Industrial Odor

Noise: Normal

Rail spur into facility: None on-site.

Emergency notification alarm for surrounding area: Signs for on-site employees. Notification to Health Dept / Fire Dept / Police Dept.

Facility consists of: 640 Acres land w/ 80 Acres of active land.

Other ancillary operations including any non-hazardous operations?
On-site Subtitle C non-hazardous waste storage
Evap pond for leachate, Septic Pond for padwater.

DESCRIPTION OF OPERATIONS

Current operations	permitted:	<input checked="" type="radio"/> Y	<input type="radio"/> N	<input type="radio"/> NA
Chemical treatment			<input checked="" type="checkbox"/> X	<input type="checkbox"/>
Neutralization		<input type="checkbox"/>	<input checked="" type="checkbox"/> X	<input type="checkbox"/>
Oxidation		<input type="checkbox"/>	<input checked="" type="checkbox"/> X	<input type="checkbox"/>
Other		<input type="checkbox"/>	<input checked="" type="checkbox"/> X	<input type="checkbox"/>
Physical treatment		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Solidification/stabilization		<input checked="" type="checkbox"/> X	<input type="checkbox"/>	<input type="checkbox"/>

	<u>Y</u>	<u>N</u>	<u>N/A</u>
Incineration	<u>X</u>		
Evaporation (headwater only)	<u>X</u>		
Blending	<u>X</u>		
Sludge de-watering		<u>X</u>	
Biological treatment		<u>X</u>	
Landfilling C or D or both	<u>X</u>		
Waste piles		<u>X</u>	
Deep well injection		<u>X</u>	
Surface impoundment		<u>X</u>	
Solvent recovery (AA, BB, CC ?)		<u>X</u>	
Waste Oil Marketer		<u>X</u>	
Fuel blending (AA, BB, DD?)		<u>X</u>	
Radiologic (regulated)		<u>X</u>	
Bio-hazardous medical waste		<u>X</u>	
PCB's (less than 50 ppm)	<u>X</u>	<u>X</u>	
Drum storage	<u>X</u>		
Bulk liquid storage	<u>X</u>		
Transportation	<u>X</u>		
Transfer (specify if less than 10 days) yes	<u>X</u>		

GENERAL FACILITY STANDARDS

SECURITY

Is facility's entry secure? yes
 Are "Danger - Unauthorized Personnel Keep Out" signs easily observed? yes
 Are they in Spanish also? NO - only have some

DOCUMENTS

(Not required)
 Are required documents on site? yes
 Are training records retained for at least 3 years? yes
 Do inspections include: inspector, date, observations, problems, corrections? yes

PERSONNEL TRAINING

Is training provided to applicable job duties? Yes (All staff 40 hour)
Does it include emergency response? Yes (for employees required)
Is training program complete? Y
Is training given within 6 mos. Of hiring? Yes
Are records maintained for 3 years? Yes - indefinitely

IGNITIBLE, REACTIVE OR INCOMPATIBLE WASTES

Does plant meet:
"No Smoking" signs? Yes - designated areas only.
Protected from ignition sources? Yes.
Proper handling? Yes.

OPERATING RECORD

Does it describe:
Description and quantity of each haz. waste? Yes
Method a date of treatment storage or disposal? Yes - WIM web
Location of each waste within the facility? Yes.
Closure cost estimates? Yes
1.7M - plant site.
2.5M - monofill

PERSONNEL TRAINING

Who provides training? Training Mgr.
Are they qualified? Yes. - 20 yrs. exp.
Is there initial classroom training that is site specific? Most training is. Some site specific too.
How is understanding of material verified? Testing
Does the new employee receive on the job training before going solo? Yes, monthly or Annual refreshers
Does the new hire supervisor sign off before going solo?
What kind of training programs are provided to employees?
Inbound Energy Response } see attached list
How often are these programs offered as refreshers?
Monthly or Annual

Are mock drill held to exercise emergency procedures? *Weekly and Annual drills*

LABORATORY

Does the facility have an analytical lab? *Yes*
% of containerized wastes tested? *depends on Waste Stream and randomly selected.*
% of bulk liquid wastes tested? *100%*

Lab analytical capabilities:

- ✓ Paint filter test
- ✓ VOCs
- ✓ SVOCs
- ✓ BTUs
- ✓ Totals
- ✓ TCLPs
- ✓ PCB
- ✓ pH
- ✓ Conductivity
- ✓ Cyanide/sulfide screening
- ✓ Flashpoint
- ✓ total halogens
- ✓ % solvents
- ✓ S.G.

Equipment used:

- ✓ AA
- ✓ TCLP extraction
- ✓ ICP
- ✓ wet chemistry

Are SW 846 methods performed including QA/QC, holding time? *Yes*

Lab manager's education? *B.S / Experienced*

Is third party lab used for any reason? *Yes - for environmental monitoring 3rd party labs used*

EMERGENCY COMMUNICATIONS

Does the facility have an internal communication alarm system to warn employees? *Yes*
Describe? *Siren, PAs; 2 way radios*

Communication equipment tested how often? *Weekly / Annual*

What system is used to warn those off-site? *Notify by phone local authorities*

How are emergency agencies summoned? *Called by phone*

Does the facility have trained first responders? *Yes*
What are they capable of doing? *Full capacity response on-site and off-site service.*

What kind of PPE do they have available? *Up to level A. Fire and Police train on-site.*

What kind of fire control equipment is available? *Sprinklers, Foam Suppression, etc A-B Fire classes.*

Is there an adequate water supply? *Yes, well and water tank storage.*

Have arrangements been made with local emergency response agencies?

Describe arrangements and with whom? *Written Notes*

Yes
Fire, Police & HHS/SES.

Has facility dealt with an emergency where response was necessary?

Yes - small fires in shredder operations

(MDEQ also)

Was soil, groundwater, surface water or equipment contaminated?

NO

Was proper remediation done?

Approved?

N/A

Have any materials exceeded their RQ's for reporting?

NO

Was reporting done within required time limit?

N/A

LOADING AND UNLOADING TRUCKS

Is there a no smoking policy?

Yes - only in designated areas

Are signs easily seen?

Yes

Is handbrake on while unloading or loading?

Yes

Is a qualified person in attendance?

Yes

For flammable cargo:

Is engine off?

Yes

Grounding?

NO grounding - all metals contained. No consolidation @ this site.

For corrosive cargo:

Nitric acid not stored above other materials?

Correct - only in Oxy Bldg.

Manholes and valves closed?

N/A

Placarding of vehicle done according to 49 CFR requirements?

Yes

TRANSPORTATION

Does facility transport it's own wastes?

Yes and 3rd party transporters.

Describe type and number of vehicles?

*Trailers, Roll off trucks, 18-wheel trucks.
~ 120 vehicles daily.*

What states are vehicles permitted in?

All.

Are liability insurances met? *Yes*

Any DOT citations, violations? *None*

Are drivers CDL trained? *Yes*

Are drivers trained on how to deal with H.W. spill? *Basics to contain and notify*

Who responds to remediate? *Korball Safety - will determine response*

Are vehicle inspection reports complete and available for review? *Yes - not on-site. Corporate.*

Are vehicles maintained in good condition? *Yes*

Are cargo trucks used to transport <3000g. given hydrostatic or pneumatic tests after being in an accident, shell modified or out-of service for more than a year? *N/A*

If transportation is contracted out, does this facility audit the transporter? *Based on performance. No official audit program*

SHIPPING/MANIFESTING

Does facility ship hazardous waste? *Yes*

Examples of destinations? *Any Clean Harbors TSDF or SafetyKlean*

Do facility personnel prepare material for shipment? *Yes*

What is training and experience of these employees? *See training sheets.*

Are drums recycled? *NO*

If not used again, what is done with containers facility receives? *N/A*

If tripled rinsed, what happens to wastewaters? *N/A*

Are containers being shipped off-site properly labeled, in good condition and marked "this side up" for liquids? *Yes*

Are shipping papers properly prepared by knowledgeable personnel? *Yes*

IMPORT/EXPORT

Does facility import or export hazardous waste?

*Import from Canada (customs or clean harbors)
No exports.*

If yes, from or to where?

What types of wastes are imported/exported? All Classes.

Who transports? Both 3rd party & ocean carriers

DISCHARGES

Does this facility discharge to the AIR – WATER – SOIL

AIR:

Does facility maintain an Air Emissions Inventory? Yes

Is site required to have a permits and controls? Yes

Title V – permit # 03121-00 / date permitted: 8/6/2009

Minor source – state permit? N/A when was status determined? _____

Does facility have point source emissions? (incinerator): (boilers) N/A

From hazardous waste? Yes (blend) Used as fuel disposal only

From non-hazardous waste? No Used as fuel disposal only N/A

Other non-waste fuel sources? Natural Gas for start up

Does the facility produce fugitive emissions? Yes Source? Haul Road to monofill.

Does facility conduct ambient air sampling? Yes, TSP Watering road.

If required, how often? Quarterly / Semi Annual Metals as needed.

Any exceedences? No.

AIR POLLUTION CONTROL DEVICES:

Air washer

Catalytic incinerator

Dry filter

Fume scrubber

Scrubbers (name specific ones)

baghouse

cyclone collector

electrostatic precipitator

oil mist collector

Does the facility have boilers? Yes
What fuels are used? Nat. Gas
Does it meet emission limits for NOx, SOx etc.? Yes.

Does the facility have an incinerator(s)? # Yes For H.W. For non-H.W.
When was it permitted? 1995
Are there CEMs? Yes, daily
How often are they calibrated? Qtrly.

Are permits and emission documentation on file? Yes.

Are there any future plans to change equipment and/or processes that might affect air quality? Tanz Farm - Major modification to Title V Permit

Have there been any enforcement actions, consent decrees, fines, etc, against the facility? Yes,
WASTEWATER Dioxin Fines 2011 \$1200.
MDEQ

POTW

Does the facility discharge into a POTW? No
Is a permit and testing required? Permit # _____ date:

Has the facility had any violations regarding illicit discharges? N/A

Has the facility had any reportable discharges? N/A

SEPTIC

Does the facility discharge into a septic field? Yes
Is the facility permitted to do so? Not anymore / used to be in MDEQ

INJECTION WELLS

Permit # None date:
Does the facility dispose of waste into injection wells? No

If yes, does it dispose according to requirements? (casing depth, integrity testing, injection pressure, volume limits) N/A

Are the following processed prior to injection: N/A
Leachate
contaminated groundwater
Misc. wastes from labs, unloading/loading areas etc.

Contaminated stormwater from:

NPDES

SIC _____

Is the facility permitted to discharge stormwater? # NE0101892 date 1/1/2010
_____ date _____

Does the facility comply with all Sector K requirements? Yes.

Has facility implemented a stormwater PPP? Yes.

Sampling requirements? Yes

Outfalls sampled? # 3, 2x storm event

Documentation and reporting? Yes,

Have there been any enforcement actions, consent decrees, fines, etc, against the facility? NO.

LAND

Does the facility have a Subtitle D landfill? NO

Date _____

Does the facility have a Subtitle C landfill? # NE020338 Date 11/18/2009

Do these require air permits: (NSPS) • Sampling?

NO

Is the Paint Filter Test used to prevent the acceptance of bulk liquids into landfills? NO - not specific for ash

Is procedure in waste analysis plan and in operating record? N/A

For Subtitle C landfills does the facility have:

A list of haz. wastes placed or to be placed in landfill? Yes.

Location of each H.W. and type? Yes

Control of particulate wind dispersal and Yes

Run-on/run-off controls from a 25yr event? Describe: designed as such and lined.

Leachate collection system(s) /leak detection/inspections? Yes

Weekly recorded amounts from each system sump? daily/weekly

Liner(s) /leak detection inspections? Yes

Cover system? Yes, Alt cover and basic cover.

How are incompatibles placed so as not to cause a reaction? N/A

Are containers at least 90% full or crushed? N/A

Are lab-packs landfilled? NO I sufficient sorbent used? N/A

Has an action leakage rate been proposed and response action plan? Yes

Is the monofill 1/4mi. or more from drinking water source? Yes

How will wastes and residues be removed at closure? Will not be removed. planned to remain on-site indefinitely.

Or, was it contaminated by present facility?
Or required in case contamination occurs? N/A

Is there a consent decree and or permit with regulatory agency?
What is required of you to remediate contamination? N/A

How many wells? Upgradient?
What does the system include:

How long before contamination is remediated?
Does the groundwater monitoring system meet requirements?

How often is a report required to be submitted?
Have there been any enforcement actions, consent decrees, fines, etc, against the facility?

RCRA STORAGE REQUIREMENTS

TANK SYSTEMS Subpart J (free liquids & outdoors or free liquids inside a building with permeable floor)

What wastes codes are stored?

Existing	number	total capacity	above or underground
Permitted	<u>NEB 18 173513</u>	_____	_____
Interim status	_____	_____	_____
Accumulation	_____	_____	_____

Are tanks marked with contents? Yes Any state requirements? Yes - USEQ

Have existing tanks without sec. containment been assessed by IQRPE?
Are record on file?

Do tanks have secondary containment, required freeboard, (above ground) leak detection system? (underground), cathodic protection? Yes. - no underground tanks
What make up the containment? (dikes, Berms, walls; how high)? Metal tanks.

Are annual leak detection tests none? Yes

Are daily inspections of tanks and ancillary appurtenances documented? Yes.
Does ancillary equipment include monitoring equipment e.g. guages, leak detection equipment, cathodic protection? Yes

Are ignitable and reactive wastes rendered non hazardous or prevented from igniting or reacting before placing in a tank? No.

Is care taken to not cause tanks, ancillary equipment and secondary containment to rupture, leak, corrode or fail? *Yes*.

Have any leaks, ruptures or incompatible reactions occurred on any haz. waste storage or treatment tanks? *No*.

Was the emergency response plan put into affect? *N/A*
Was the contamination removed?
Was the notification to the proper agencies made within 24 hrs.?
Was a written plan submitted within 30 days?
Was system closed unless integrity OK?
Remove releases?
Certify major repairs within 7 days?

CONTAINERS

Does facility have a drum handling procedure? *Yes*.

Is container area covered? *Yes - except during staging for shredder process.*

What kind of containers are accepted:

- 55g drums
- bins
- totes
- other (AU)

What is max. number that can be stored? *Yes - see attachment*

Are they stored in secondary containment? *Yes Bermed? Sumps.*

How high? *Sumps* Pallets in between? *No*.

How far apart? *at least 2 feet*

Are containers maintained in accordance with requirements

- Good condition
- Closed during storage
- Labeled properly
- Additional state requirements
- Inspected weekly *daily*
- Inspections documented
- Compatible with waste

Is area and sumps in good shape? *Yes* Cracks no seal or liner

How are incompatibles separated? (barriers, distance) *distance and sumps*

Are flammables 50' or more from property line? *Yes*

What kind of fire suppression in storage area? *Separate systems as needed*
When last serviced?

What kind of spill control? *(Sumps)*

What kind of personal safety equipment? *PPE / eye wash / shower*

Is PPE appropriate for haz. waste being handled? *Yes - MSDS / Cotts*

INCINERATOR, BOILER, HAZARDOUS WASTE STORAGE, BLENDING OR DISPOSAL

N/A

AA – STANDARDS FOR PROCESS VENTS ASSOCIATED WITH DISTILLATION, FRACTIONATION, THIN FILM EVAPORATION, SOLVENT EXTRACTION OR AIR/STEAM STRIPPING OPERATIONS. EXEMPTION: VENTS ARE EQUIPPED WITH CAA APPROVED EMISSION CONTROLS.

Does facility reduce organic emissions by 95 weight %?

Does the facility have closed-vent systems and control devices (required)?

Are these visually inspected at joint, seams, etc. at least once/yr.?

What kind of system is used to burn off the emissions (boiler, thermal vapor incinerator, process heater, flare, catalytic vapor incinerator)?

Is carbon absorption system used?
How is saturation detected?

Does the system have a flow indicator of vent stream flow and CEM to monitor device operations?

Are these maintained per manufacture's specs?

Are inspection, repairs etc. documented?

BB – AIR EMISSIONS STANDARDS FOR EQUIPMENT LEAKS

The equipment to which these rules apply, are they clearly marked with the ID # and haz. waste management unit ID #? *Yes. - metal tags.*
(Pumps, valves, compressors, pressure relief devices, sampling connection systems, closed-vent systems and control devices that contact haz. waste with organics above 10% by weight)

Has a written method of compliance leak detection program been implemented? *Yes*

Does the inspection log include the requirements found in 264.1064 (d) when a leak is discovered? (dates and ID #, repair method, delay reason, etc) *Yes. - 3rd party Trihydro*
Monthly testing / Quarterly

Does the facility maintain a log with the requirements found in 264.1064 (g)? (list of equipment regs apply, ID #s, dates of compliance tests, etc.) *Yes*

Does the facility maintain a log with a list of ID #s for valves designated as unsafe to monitor and why plus a plan to monitor each valve? (h) *Yes*

Does the facility maintain a log per 264.1064 (I)? *Yes*

Is a semi-annual report submitted to the regional administrator and includes the items in 264.1065? *Yes.*
NDEA

CC – AIR EMISSION STANDARDS FOR TANKS, SURFACE IMPOUNDS, AND CONTAINERS SUBJECT TO SUBPARTS I, J, OR K. EXEMPTION – A WASTE MANAGEMENT UNIT EQUIPPED WITH AIR EMISSION CONTROLS IN ACCORDANCE WITH THE CAA 40 CFR PART 60, 61 AND 63.

Yes - comply.

DD – Owners or operators who store or treat hazardous wastes stored in containment buildings.

M/A Does facility have such a building? *NO* If yes continue

Is the building completely enclosed?

Do openings form a barrier against fugitive dust?

Is floor sealed?

Does the building have a barrier to prevent migration of hazardous waste constituents?

If liquids are stored, is there a liquid collection system? If yes describe.

Is there secondary containment? If yes:

Is there a leak detection system if primary barrier fails?

Is it sloped towards collection system?

How soon is liquid removed?

Is it chemically resistant to waste?

Have any conditions that could lead to a release of haz. waste been discovered?

If yes where the repairs and notifications made?

CLOSURE/POST CLOSURE

Is the plan complete? *Yes* Maintained on site? *Yes*

Is it fully funded or funded through time? *Yes.*

Amended when necessary? *Yes - annually and as needed.*

Is the amount of \$ for closure based on "worst case closure" analysis? *Yes*

Who made determinations? *Clean Harbors & Approved by NDEQ*

Is annual cost adjusted for inflation? *Yes.*

If a landfill, does the postclosure include care and monitoring for 30 years? *Yes*
Separate for mono & fill.

Does it include the maximum permitted waste inventory? *Yes*

Does it include third party labor costs? *Yes - All 3rd party*

Does it include off-site transportation and treatment for all hazardous wastes and residues? (washwater, rinsewater, ash, contaminated solids) *Yes*

Does it include the estimate of life of facility? *Yes.*

FINANCIAL ASSURANCE

Name and address of legal owner of facility? *Clean Harbors, Inc
42 Longwater Dr.
Morwell, MA 02061*

Form of ownership? Private (See Attachment)

List types of insurance held by facility. Multi-site under one policy? no

Type	amount		carrier
Workman's comp.	2,000,000	Each	Zurich Am. Ins. Co.
General liability	2,000,000 3,000,000	Each Agg.	Zurich Am.
Auto	5,000,000	Comb. single	Zurich Am.
Environmental	3,000,000 6,000,000	each Agg.	Steadfast Ins.
Off-site injury, property Damage, cleanup	10,000,000	each & Agg.	American Guarantee and Liability.
third party costs	"	each & Agg.	

Any specific exclusions? None.

Is facility self-insured? no If yes, how funded?

Have any environmental claims been made for damages? None.

Does the facility generate an annual financial report? Yes.

Is the company a private or public? Privately owned ;
Publicly traded.

**CITY OF TUCSON/ PIMA COUNTY HOUSEHOLD HAZARDOUS WASTE PROGRAM
Tucson Fire Department**

PRE-AUDIT QUESTIONNAIRE

Please complete the following pre-audit questionnaire **or provide the information in your own format** and return to:

Tucson/Pima County HHW Program
ATTN: Frank Bonillas, Program Coordinator
2440 W. Sweetwater Dr.
Tucson, AZ 85705-6921
TEL: 520-690-5749, FAX: 520-882-7709

A. General information.

Facility/Company Name: Clean Harbors Environmental Services, Inc.

Contact: Danielle Reader Telephone: 308-235-8212

Mailing Address: 2247 South Highway 71

City: Kimball State: NE Zip: 69145

Facility Address (if different): Same

City: _____ State: _____ Zip: _____

Parent Company (if applicable): Clean Harbors, Inc.

Mailing Address: 42 Longwater Drive

City: Norwell State: MA Zip: 02061

Years facility has been in operation: 20 **Current owner for** 18 **years.**

List previous owners and years of operation:

1987 – Farmers/Ranchers
1987 - 1989 – Waste Tech, Subsidiary of Bechtel Corp : Purchased site and did initial design and planning of the incinerator
1989 - 1995 – AMOCO Oil Company (later ECOVA) : AMOCO incinerator, originally constructed to incinerate AMOCO oil and chemicla waste from US operations
1995 – Present – Clean Harbors Environmental Services : Commercial hazardous waste incinerator

B. Insurance and financial information.

Please list your type of environmental insurance coverage and amounts, insurance carrier and insurance carrier rating. Attach copies of forms. List exclusions and/or additional riders if not on forms.

Type	Carrier	Policy#	Expiration	Amount of Limits
General Liability	Zurich American Insurance Co.	GLO 9681229-06	11-01-2013	\$2,000,000 Each Occurrence; \$3,000,000 General Aggregate
Auto Liability	Zurich American Insurance Co.	BAP 6681231-06	11-01-2013	\$5,000,000 Combined Single Limit
Excess Liability	American Guarantee and Liability Insurance Co.	AUC4275262-08	11-01-2013	\$10,000,000 Each Occurrence and Aggregate
Workers' Comp	Zurich American Insurance Co.	WC 9681232-06	11-01-2013	\$2,000,000 Each Accident
Environmental Impairment Liability	Steadfast Insurance	PLC-5834364-00	11-01-2013	\$3,000,000 Each Occurrence and \$6,000,000 Annual Aggregate

C. List the waste streams accepted by your facility and how they are processed.

Incoming Stream	Method of Handling	Throughput Quantity
Dry Solids	Shredding as required, storage and incineration	~18,700 tons/yr
Wet Solids	Storage and incineration	~1,300 tons/yr
Viscous Liquids	Storage and incineration	~15,000 tons/yr
Non-viscous liquids	Storage and incineration	~9,500 tons/yr
Direct feed liquid from tank trucks	Incineration	~650 tons/yr
Universal waste, and other non-processable wastes	Transfer in other containers	~44,000 Drums/yr
	Drums manifested to Kimball but subsequently shipped out	~27,000 Drums/yr

D. List processes and materials previously managed at your facility but no longer handled.

N/A

E. Describe the area surrounding the facility (near schools, rivers, other industries etc.).

The area surrounding Clean Harbors is ranching and agriculture land. The neared residential structure is approximately 1 mile from the facility.

F. List environmental permits and//or licenses held by your facility.

EPA ID #: NED981723513

State/Local ID #:

Regulatory Authority	Permitted Activity	Permit #	Effective Date	Expiration Date
NDEQ, RCRA	Treatment and Storage	NED981723513	06/01/2009	05/30/2014
NDEQ, Air	Incineration	03R1-001	08/06/2009	08/2014
NDEQ, NPDES	Storm water discharge (discharge to evaporation lagoons)	NE0127892	01/01/2010	12/13/2014
NDEQ, Solid Waste	Monofill	NE0203238	11/18/2009	11/17/2014
USDA	Soil Permit/contaminated soil acceptance	P330-09-0259	12/16/2012	12/16/2015

G. Are inspection records available for review? Yes No

Letter of Warning dated April 22, 2013 from the NDEQ as a result of a semi-annual compliance inspection. 1) Failure to keep a container holding hazardous waste closed 2) Failure to document that required training has been given to facility personnel.

Notice of Violation received August 30, 2012 from the EPA as a result of an annual compliance inspection. 1) Failure to close roll-off containers in storage. Hazardous waste was observed on the lips of several containers.

Letter of Warning dated April 30, 2012, from the NDEQ as a result of a semi-annual compliance inspection. 1) Failure to mark a miscellaneous unit with a tag number 2) Failure to clearly mark each container to identify its contents and the date each period of accumulation began 3) Failure to keep a container holding hazardous waste closed 4) Failure to label each satellite container with the words "Hazardous Waste" 5) Failure to keep satellite accumulation containers closed 6) Failure to mark each 90-day container with the words "Hazardous Waste" 7) Failure to mark the date upon which accumulation began on each container of hazardous waste.

Notice of Violation received August 9, 2011 from the EPA as a result of an annual compliance inspection. 1) five containers in storage were not in good condition or were open. 2) Secondary containment in Area 70 was found to contain cracks. 3) Open-ended line found in Area 50C 4) Daily inspections of tanks H150A/B were not inspected at proper location 4) North flange on top of TOU was puffing slightly 5) Compatibility tests were not conducted for all transfers of waste into storage tanks 6) T-enclosure in Area 50C was not being operated as tested due to openings.

Letter of Warning received May 4, 2011 from the NDEQ as a result of a semi-annual compliance inspection performed in March 2011: 1) Failure to mark each miscellaneous unit with a tag number. 2) Failure to calibrate a piece of monitoring equipment at the frequency specified in the permit. 3) Failure to keep a container of universal waste lamps closed. 4) Failure to report a fire within 15 days, the report was made in 24 days 5) Failure to submit a quarterly list of equipment that was out of service 6) Failure to amend the Contingency Plan when there was a change to the list of emergency coordinators.

Notice of Violation received 3/8/2011 from NDEQ-RCRA division for failure to meet dioxin emission limit in all three test conditions during an annual performance test. Facility re-tested in September 2011, which demonstrated compliance. No penalty assessed.

[Notice of Violation dated July 21, 2010 from the United States Environmental Protection Agency (EPA) following an inspection performed July 20 -21, 2010. 1) Hazardous waste containers not closed in Area 25. 2) No Subpart BB ID tags on hose for RR3113 to TOU. 3) Cracks in containment coating in Area 70 and seams in Area 25. 4) No written operating record to show the location and quantity of each hazardous waste in the facility. 5) Two torn super sacks of hazardous waste in Area 57B. 6) Separate incompatible hazardous waste from other materials. The issues were resolved without penalty after written response and corrective actions were documented.

Notice of Violation dated May 21, 2010 from the NDEQ following a RCRA inspection performed March 30- April 2, 2010. 1) Failure to mark each 90-day accumulation container of hazardous waste with the words "Hazardous Waste". 2) Failure to mark each 90-day accumulation container of hazardous waste with the date upon which each period of accumulation begins. 3) Failure to conduct daily inspections of container storage and staging areas 57A, 578 and 57C. 4) Failure to mark each miscellaneous unit with tag number identified in Appendix VII of the permit. 5) Failure to comply with the total maximum pumpable hazardous waste feed rate of 10,657 lb/hr based on a 60 minute rolling average. The issues were resolved without penalty after written response and corrective actions were documented.]

The NDEQ inspection conducted in June 2009 identified 7 violations and 6 areas of concern in a letter of warning (LOW) to the facility in August 2009. Violations and concerns included control of site access issues, lack of posted signage, satellite accumulation container issues, failure to mark units, failure to conduct tank inspections and other required daily storage area inspections, storage of wastes in areas without secondary containment, housekeeping issues, and other miscellaneous items. The facility responded to the LOW in October 2009, and later in October 2009 the NDEQ indicated that all violations and areas of concern from the June 2009 inspection had been fully addressed.

The NDEQ inspection conducted in September/October 2009 identified 5 violations and 7 areas of concern in a LOW to the facility in November 2009. Violations and concerns included missing labels, tank closure submission deficiencies, other reporting and documentation deficiencies related to secondary containment repairs, an auger leak, employee job titles inconsistencies with the training plan, and thoroughness of inspections. The facility responded to the LOW and in February 2010, the NDEQ indicated that all violations and areas of concern from the September/October inspection had been fully addressed.

Other historical inspection results from the last five years include:

October 21, 2008 – NDEQ Solid Waste Division conducted a comprehensive inspection of the monofill and monitoring wells, and inspected quarterly/annual reports, inspection records, operating data, monitoring data, and recordkeeping. NDEQ reported no significant findings for noncompliance

August 19 – 22, 2008 – U.S. EPA Region 7 conducted a rigorous RCRA facility inspection and related inspection reports, manifest records, operating data, calibration records, training records, required permit documents, and recordkeeping. EPA reported no significant findings for noncompliance.

April 15 – 17, 2008 – NDEQ conducted a RCRA facility inspection. A Notice of Violation was issued for storage of an unspent oxygen generator (self-reported), failure to inspect a hazardous waste container within 10 days, open work orders to repair cracks and unsealed seams in containment structures, and an improper date label on one container in the 90-day accumulation area. All issues were immediately addressed and resolved. NDEQ vacated the violation for an improper container date label and failure to inspect a container within 10 days. To date, no judgment or fine has been assessed for the remaining items.

September 25 – 27, 2007 – U.S. EPA Region 7 conducted a RCRA facility inspection. A Notice of Violation was issued for open storage containers, absent or cracked impervious coating in a containment area, unlabeled containers, and containers lacking hazardous waste determination. All issues were quickly corrected. [A consent order with a penalty of \$150,000 was issued in June 2010 related to these violations (see response to D43Ba below)]

April 26, 2007 – NDEQ Solid Waste Division conducted an inspection of the monofill, operating records, monitoring data, training records, inspection records, and quarterly/annual reports, and pumping records. NDEQ reported no significant findings for noncompliance.

April 3 – 6, 2007 – NDEQ conducted a RCRA facility inspection. NDEQ found the following deficiencies: 1) Area 40 did not have 2-foot aisle space; 2) failure to provide continued training for one individual; 3) failure to store/accumulate site-generated waste in a permitted storage or 90-day accumulation area; 4) direct feed system secondary containment concrete wall was spalled in three places; 5) calibration records not available for differential bed temperature for TE-307A; until 4/4/07), 6) failure to submit revised copies of the contingency plan to local agencies, state agencies, and local emergency response teams. All issues were immediately corrected.

It is unknown what if any penalties will be assessed by EPA as a result of six violations identified in the August 2011 annual inspection. The six violations identified by USEPA in a July 2010 NOV were resolved without penalty.

In June 2010 Clean Harbors agreed to pay a \$150,000 civil penalty to the United States to settle a series of alleged violations of hazardous waste regulations related to RCRA inspections of the facility by EPA in September 2007 and by the Nebraska Department of Environmental Quality in April 2008. See Attachment H-11 for the Consent Agreement and Final Order.]

An Expedited Settlement Agreement for failure to file a RMP update was completed on March 29, 2010 with a fine of \$1200. Plan was filed on time but lost in the EPA CDX system and was not certified.

A civil penalty fine of \$38,500 and a Supplemental Environmental Project (SEP) valued at \$233,000 were required by the Consent Agreement and Final Order with U.S. EPA Region 7-- resulted from the NOV issued after the April 8-10, 2004 US EPA inspection. The SEP, which involved removal of hazardous waste from Nebraska high schools, was completed in February, 2007.



Clean Harbors Environmental Services, Inc.
2247 South Highway 71
Kimball, Nebraska 69145
308.235.4012
www.cleanharbors.com

Sent via FedEx

November 8, 2012

Mr. Keith Powell
Nebraska Department of Environmental Quality
Suite 400, The Atrium
1200 "N" Street
Lincoln, Nebraska 68509

Re: Environmental Impairment Liability

Dear Mr. Powell:

Enclosed please find the Environmental Impairment Liability certificate for the Clean Harbors Environmental Services, Inc. Kimball Facility.

If you have any questions, please contact me at (308) 235-8212 or by email.

Sincerely,

A handwritten signature in black ink that reads "Danielle Reader". The signature is fluid and cursive, with a long horizontal line extending to the right.

Danielle Reader
Sr. Compliance Manager
readerd@cleanharbors.com

HAZARDOUS WASTE FACILITY CERTIFICATE OF INSURANCE

1. Name of Insurer: Steadfast Insurance Company
Address of Insurer: 1400 American Lane
Schaumburg, Illinois 60196

hereby certifies that it has issued liability insurance covering bodily injury and property damage to:

Name of Insured: Clean Harbors Environmental Services, Inc.
Address of Insured: Highway 71, 5 miles South of Kimball
Kimball, Nebraska 69145

in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at (see below) for SUDDEN ACCIDENTAL OCCURRENCES. The limits of liability are \$3,000,000 each occurrence and \$6,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number PLC 5834364-00, issued on November 1, 2012. The effective date of said policy is November 1, 2012.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

- (a) Bankruptcy or insolvency of the Insured shall not relieve the Insurer of its obligations under the policy;
- (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f);
- (c) Whenever requested by the Director of the Nebraska Department of Environmental Quality, the Insurer agrees to furnish to the Department a signed duplicate original of the policy and all endorsements;
- (d) Cancellation of the insurance, whether by the Insurer, the Insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, will be effective only upon written notice by certified mail and only after the expiration of 60 (sixty) days after a copy of such written notice is received by the Director of the Nebraska Department of Environmental Quality;
- (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Director of the Nebraska Department of Environmental Quality.

NAME OF FACILITY	ADDRESS OF LOCATION	EPA IDENTIFICATION NUMBER
Clean Harbors Environmental Services, Inc.	Highway 71, 5 miles South of Kimball Kimball, NE 69145	NED981723513

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.



Mark Brazell
Senior Environmental Underwriter
Authorized Representative of Steadfast Insurance Company
100 High Street
Boston, MA 02110

Authorized Representative of:
Steadfast Insurance Company
Administrative Officer
1400 American Lane
Schaumburg, IL 60196-1056



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY) 10/29/2012

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER Willis of Massachusetts, Inc. c/o 26 Century Blvd. P. O. Box 305191 Nashville, TN 37230-5191	CONTACT NAME: PHONE (A/C. NO. EXT): 877-945-7378	FAX (A/C. NO.): 888-467-2378	
	E-MAIL ADDRESS: certificates@willis.com		
INSURED Clean Harbors Environmental Services, Inc. and its affiliates 42 Longwater Drive Norwell, MA 02061	INSURER(S) AFFORDING COVERAGE		NAIC #
	INSURER A: Zurich American Insurance Company		16535-002
	INSURER B: American Guarantee and Liability Insuranc		26247-003
	INSURER C: Catlin Specialty Insurance Company		15989-000
	INSURER D:		
	INSURER E:		

COVERAGES

REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN. THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

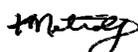
INSR LTR	TYPE OF INSURANCE	ADD'L INSRD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	GENERAL LIABILITY <input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR <input checked="" type="checkbox"/> XCU <input checked="" type="checkbox"/> Contractual GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input checked="" type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC	Y		GLO 9681229-06	11/1/2012	11/1/2013	EACH OCCURRENCE \$ 2,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 100,000 MED EXP (Any one person) \$ 5,000 PERSONAL & ADV INJURY \$ 2,000,000 GENERAL AGGREGATE \$ 3,000,000 PRODUCTS - COMP/OP AGG \$ 2,000,000 \$
A	AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS <input checked="" type="checkbox"/> NON-OWNED AUTOS <input checked="" type="checkbox"/> MCS-90	Y		BAP 6681231-06	11/1/2012	11/1/2013	COMBINED SINGLE LIMIT (Ea accident) \$ 5,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
B	<input checked="" type="checkbox"/> UMBRELLA LIAB <input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DED RETENTION \$			AUC4275262-08	11/1/2012	11/1/2013	EACH OCCURRENCE \$ 10,000,000 AGGREGATE \$ 10,000,000 \$
A	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? <input type="checkbox"/> Y <input checked="" type="checkbox"/> N (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below		N/A	WC 9681232-06	11/1/2012	11/1/2013	<input checked="" type="checkbox"/> WC STATUTORY LIMITS <input type="checkbox"/> OTHER E.L. EACH ACCIDENT \$ 2,000,000 E.L. DISEASE - EA EMPLOYEE \$ 2,000,000 E.L. DISEASE - POLICY LIMIT \$ 2,000,000
C	Contractors Pollution Liability			CPV-671802-1113CPL	11/1/2012	11/1/2013	\$10,000,000 Each Claim \$10,000,000 All Claims \$ 250,000 Self-Insured Retention

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (Attach Acord 101, Additional Remarks Schedule, if more space is required)

See Attached:

CERTIFICATE HOLDER

CANCELLATION

-- For Reference Only --	SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS. AUTHORIZED REPRESENTATIVE 
--------------------------	--



ADDITIONAL REMARKS SCHEDULE

AGENCY Willis of Massachusetts, Inc.		NAMED INSURED Clean Harbors Environmental Services, Inc. and its affiliates 42 Longwater Drive Norwell, MA 02061	
POLICY NUMBER See First Page		EFFECTIVE DATE: See First Page	
CARRIER See First Page	NAIC CODE		

ADDITIONAL REMARKS

**THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM,
 FORM NUMBER: 25 FORM TITLE: CERTIFICATE OF LIABILITY INSURANCE**

Environmental Impairment Liability
 Policy Number: PLC-5834364-00
 Carrier: Steadfast Insurance Company
 Policy Period: 11/1/2012 - 11/1/2013
 Limits:
 \$10,000,000 Each Claim
 \$10,000,000 Aggregate

Facility Audit: Kimball, NE



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1.0 General Company Information

Introduction

Clean Harbors is North America's leading provider of environmental, energy and industrial services serving over 50,000 customers, including a majority of the Fortune 500 companies, thousands of smaller private entities and numerous federal, state, provincial and local governmental agencies.

Within Clean Harbors Environmental Services, the company offers Technical Services and Field Services. Technical Services provide a broad range of hazardous material management and disposal services including the collection, packaging, recycling, treatment and disposal of hazardous and non-hazardous waste. Field Services provide a wide variety of environmental cleanup services on customer sites or other locations on a scheduled or emergency response basis.

Within Clean Harbors Energy & Industrial Services, the company offers Industrial Services and Exploration Services. Industrial Services provide industrial and specialty services, such as high-pressure and chemical cleaning, catalyst handling, decoking, material processing and industrial lodging services to refineries, chemical plants, pulp and paper mills, and other industrial facilities. Exploration Services provide exploration, rental, oil and gas field services, and directional boring services to the energy sector serving oil and gas exploration, production, and power generation.

Headquartered in Norwell, Massachusetts, Clean Harbors has more than 175 locations, including over 50 waste management facilities, throughout North America in 38 U.S. states, seven Canadian provinces, Mexico and Puerto Rico. The Company also operates international locations in Bulgaria, China, Sweden, Singapore, Thailand and the United Kingdom. For more information, visit www.cleanharbors.com.

2.0 Facility Information

Facility Overview

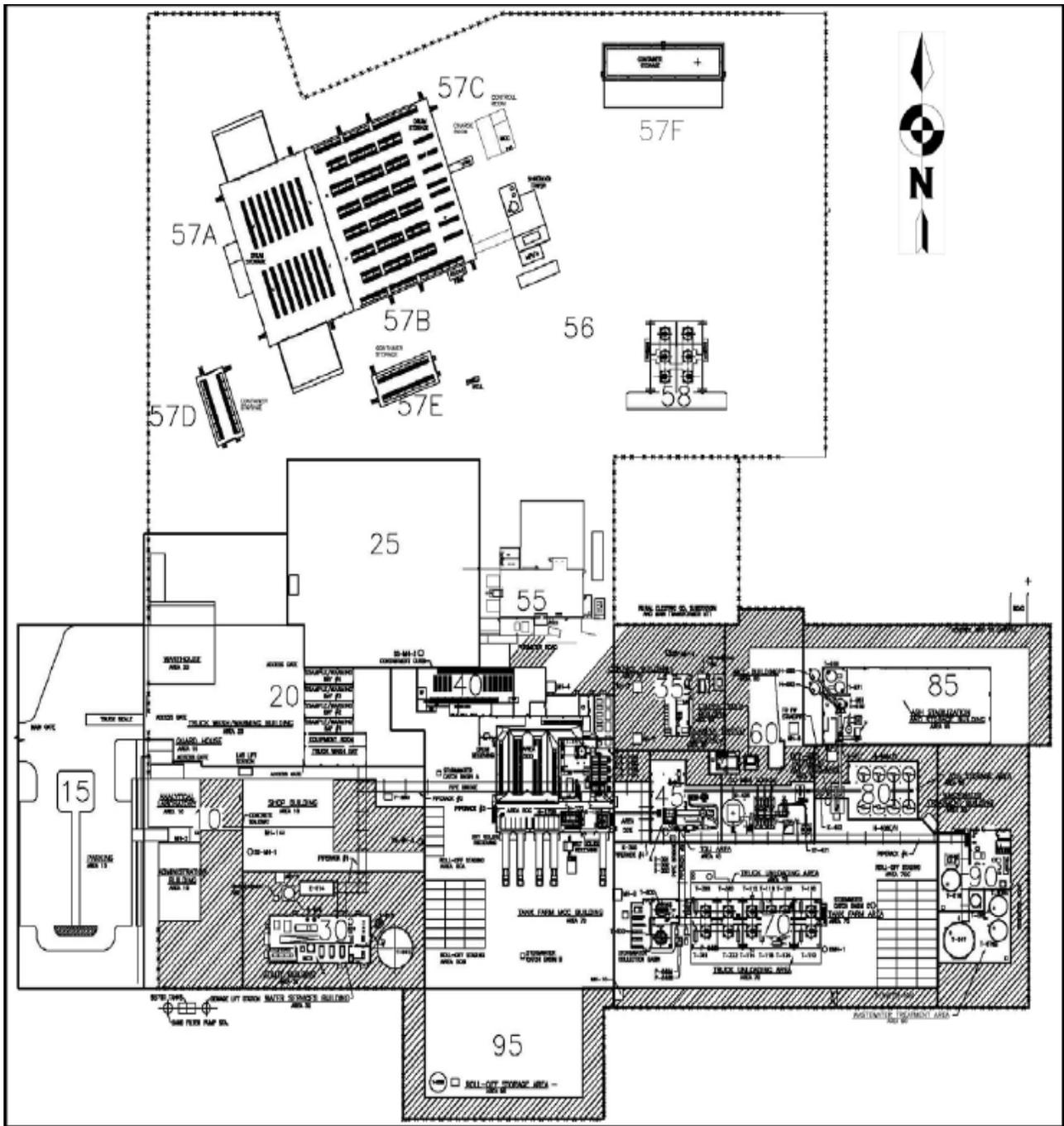
Clean Harbors Environmental Services, Inc., a subsidiary of Clean Harbors, Inc. headquartered in Norwell, Massachusetts, owns and operates a hazardous waste storage, treatment and disposal facility located in Kimball, Nebraska. The Kimball facility is a RCRA-permitted, commercial facility for treatment, storage and disposal of hazardous waste. The site includes a fluidized-bed incinerator for thermal destruction of hazardous waste, a monofill for disposal of delisted ash, and an analytical laboratory for waste analysis. The Nebraska Department of Environmental Quality (NDEQ) continuously monitors operations and stack gas emissions via computer link. The advanced design of the Kimball Facility ensures maximum destruction efficiency of waste. The residual ash from the incinerator is "delisted," meaning it no longer is regulated as a hazardous waste under RCRA. No other commercial incineration facility in the United States is currently authorized to delist ash. Delisted ash is disposed of onsite in a dedicated monofill. Although the ash is nonhazardous, the monofill has been constructed to meet RCRA Subtitle C requirements.

Health & Safety

In 2007, the facility received Voluntary Protection Program (VPP) Merit status by the Occupational Safety and Health Administration's (OSHA). Typically, VPP Merit facilities demonstrate a strong safety culture from both management and employees who ensure a safe and healthful workplace environment. Additionally, facilities that are awarded the certification have occupational injury and illness incidence rates below the state and national averages for companies within the same standard industry classification.

Facility Name	Clean Harbors Environmental Services, Inc.
Location	2247 South Highway 71 Kimball, NE 69145
County	Kimball
Facility Owner	Clean Harbors of Braintree, Inc. 1 Hill Avenue Braintree, MA 02184
Property Owner	Clean Harbors of Braintree, Inc. 1 Hill Avenue Braintree, MA 02184
Facility I.D. No.	NED981723513
Permit Type	The Kimball facility is a RCRA-permitted, commercial facility for treatment, storage and disposal of hazardous waste.
Waste Description	Most organic and inorganic waste
Services Provided	Storage/Transfer Incineration

Facility Site Plan



Facility History

The facility was designed and constructed by Waste-Tech Services, Inc., a subsidiary of Amoco Corporation, in 1993. In 1994, the subsidiary name was changed to Ecova Corporation. Clean Harbors purchased the facility from Ecova Corporation in May of 1995. Prior to 1993, the site was utilized for agricultural purposes.

Site Characterization

The facility is located on grassland south of the town of Kimball. The facility location is moderately rolling ground, free of overhead and underground obstructions. The topography of the local area surrounding the facility consists of alternating ridges and basins with numerous dry drainages that experience flows only during heavy precipitation and snow melt. The local elevation varies generally from 4,795 to 4,896 feet with the lowest areas located in the drainage. The largest and nearest local surface water body is Lodgepole Creek located 7 miles north of the facility. An onsite water well is used to supply make-up water to facility processes. Stormwater runoff from uncontained, non-process areas flows to drainage north and south of the facility which flows to Sand Draw, an intermittent flow drainage to the north and east of the facility.

Land uses within one-half mile of the facility boundary consist of rangeland for livestock and wildlife forage. Surface soils are generally high in calcium carbonates and are not suited for dry land farming uses. The facility and the surrounding buffer area amount to 640 acres. The active, hazardous waste management portion of the facility encompasses approximately 15 acres of formally unimproved rangeland. No residences or structures exist within one-half mile of the facility.

Security

The Kimball facility is surrounded by fences to control access. Additional security procedures and equipment include telephones, portable/fixed floodlights, and hand-held two-way radios. Access by visitors, contract workers, and waste/general delivery truck drivers is restricted and controlled by facility security personnel. The main entrance is manned twenty-four hours a day, 365 days a year. Truck drivers are restricted to vehicle inspection, staging or unloading areas while at the facility. Personal vehicles are parked in the lot outside the facility's security fence, and away from hazardous waste management areas.

Signs are legible from a distance of at least 25 feet, will and are posted at all gates and along the perimeter fence, at 200-foot intervals around the entire facility. At least one sign is visible from all angles of approach to the facility. All signs are located at eye level (approximately 5 feet) to ensure that they are visible. All signs are written in English, English is the predominant language in the area.

Directions to Facility

Facility Address:

Clean Harbors Environmental Services, Inc
5 Miles South of Kimball on Highway 71
2247 South Highway 71
Kimball, Nebraska 69145
(308) 235-4012

NOTE: The most convenient airport to fly into is the Denver International Airport. Shuttle flights can be arranged from Denver to Cheyenne or Scottsbluff, which are about an hour closer to Kimball, but generally this will not save any travel time. Total travel miles are 150. Travel time should be about 2.5 hours. If snow or severe weather is expected, a four-wheel drive rental car is recommended. It is also recommended to get a rental car map as Kimball can be seen on most maps.

From the Denver airport:

- Take Pena Boulevard out of the airport
- Take Tower Road north to 120th Street.
- Take a left onto 120th going west to Route 76 East.
- Continue on 76 to Ft. Morgan (about 75 miles) to 52 north.
(NOTE. After Ft. Morgan there are no gas stations until Kimball)
- When 52 North ends, take 14 east.
- Continue on 14 east for about 5 miles.
- Take 71 north to Kimball.
- Incineration facility will appear on your right.

A slightly longer route on a more traveled and larger highway is:

- Take Pena Boulevard out of the airport
- Pena will take you to 70 East from the airport.
- Take 70 to 25 North to Cheyenne.
- Take 80 East from Cheyenne to Kimball Exit, Route 71.
- Follow 71 south about 5 miles.
- Incinerator will appear on your left.

3.0 Operating Licenses and Permits

Permit Summary

The Nebraska Department of Environmental Quality (NDEQ) for the storage and treatment of hazardous waste permits the Kimball Facility.

Permit Type	Issuing Agency	Permit Number	Expiration Date
RCRA	NDEQ	NED981723513	5-31-2014
Air	NDEQ	03R1-001	8-5-2014
NPDES	NDEQ	NE0127892	6/30/2009*
Solid Waste	NDEQ	NE0203238	11-14-2014
Soil	USDA	P330-09-00259	12/16/2012

*extended awaiting approval

Principal Operating Licenses/Permits

Copies of existing permits which detail types of waste management licensed capacities and waste types accepted are available for inspection upon request at the site. Selected permit pages may be attached at the end of this audit under Appendix 10.0.

Facility/Agency Contacts

The list of contacts below can provide additional information regarding Clean Harbors Environmental Services, Inc., Kimball Facility operations or compliance:

Facility Contacts	
Primary Point of Contact <i>Mr. Mike Webb</i> <i>Senior Facility Compliance Manager</i> (308) 235-8207	Secondary Point of Contact Mr. Jared Hunsaker, <i>General Manager</i> (308) 235-8207
Regulatory Agency Contacts	
Ms. Siew Kour, NDEQ (RCRA) Permit Writer Suite 400, The Atrium 1200 "N" Street Lincoln, Nebraska 68509 (402) 471-3386	Ms. Debra Kennedy (RCRA) U.S.E.P.A. Region 7 901 N. 5 th Street Kansas City, Kansas 66101 (913) 551-7628
Mr. Brian Gorman, NDEQ (RCRA) Inspector Suite 400, The Atrium 1200 "N" Street Lincoln, Nebraska 68509 (402) 471-3386	Ken Herstowski (Air) U.S.E.P.A. Region 7 901 N. 5 th Street Kansas City, Kansas 66101 (913) 551-7631
Mr. Clark Smith, NDEQ (AIR) Suite 400, The Atrium 1200 "N" Street Lincoln, Nebraska 68509 (402) 471-2189	Mr. Gerald Gibson, NDEQ (Solid Waste) Suite 400, The Atrium 1200 "N" Street Lincoln, Nebraska 68509 (402) 471-0098
Mr. John Flint , NDEQ (NPDES) 4500 Ave, I, Room 129 Scottsbluff, NE 69363 (308) 632-0544	

4.0 Waste Acceptance

Waste Analysis

The Waste Analysis Plan for the facility outlines pre-qualification and on-site acceptance analysis requirements.

Pre-Qualification

Prior to acceptance and treatment of a specific waste, a Waste Material Profile Sheet must be submitted to and approved by Clean Harbors prior to any waste shipment. The waste profile can be completed and submitted online on Clean Harbors' website at www.cleanharbors.com. A sample of the waste is analyzed for the following characterization parameters: ash content, viscosity, ignitability, density, total halogens, corrosivity, dioxin, water reactivity and a metals screen. The facility will determine acceptability based on the waste profile and sample characterization results.

Once the waste material is accepted for treatment/disposal, this information becomes part of the permanent record in the generator's file and the waste may be scheduled for shipment.

Wastes Accepted by the Kimball Facility

The Kimball facility is permitted to accept a wide variety of characteristic and listed hazardous waste for storage and/or treatment. Wastes accepted may be stored and treated onsite or transferred to an authorized offsite waste treatment storage or disposal facility. More specific information on the types of hazardous waste that may be accepted at the facility is provided below.

Ignitable Wastes

The Kimball facility may accept wastes for storage or treatment that exhibit the characteristic of ignitability (i.e., flash point less than or equal to 140 degrees Fahrenheit) and carry the D001 waste code.

Corrosive Wastes

The Kimball facility may accept wastes for storage or treatment that exhibit the characteristic of corrosivity and carry the D002 waste code.

Under certain conditions, the incineration of chloride or sulfur containing wastes will generate acid gas. Therefore, concentrations of chlorides and sulfur in wastes fed to the system are analyzed before the waste is incinerated. Feedrates of these parameters are maintained within the permit limits. Any acid gases resulting from the incineration of these wastes are removed by the off-gas treatment and discharge system before discharge of the gases to the environment.

Reactive Wastes

The Kimball facility may accept for storage or treatment wastes that exhibit the characteristic of reactivity and carry the D003 waste codes subject to the limitations described in this section. The Kimball facility may accept wastes with listed waste codes for reactive organic compounds or hydrazide derivatives. The Kimball facility may accept these wastes for treatment only if the waste is commingled with other wastes onsite at the generator's site or the Kimball facility and the commingled waste does not exhibit the characteristics of reactivity. The waste codes that are in this category are:

- P068, P105, P112
- U023, U086, U098, U099, U103, U109, U133

The Kimball facility may accept the above waste codes for storage and subsequent offsite treatment and/or disposal without performing any commingling to render the waste non-reactive.

Explosive Reactive Wastes

The Kimball facility may accept wastes which carry the waste code for an explosive compound, but have been commingled prior to arrival onsite such that the commingled waste does not exhibit explosive characteristics as defined by 40 CFR 261.23 (a) (6), (7), and (8). The Kimball facility will not accept shock sensitive wastes.

Potential explosive reactivity is determined on waste streams through performance of an oxidizer screen and evaluation of a flame test. Waste streams with positive (violent) reactions occurring in both screening tests are not accepted for treatment without quantitative determination of explosive reactivity by further waste analysis. The waste codes in this category are:

- D003
- K044, K045, K046, K047
- P063, P074, P095, P098, P099, P101, P112
- U133, U234

Wastes Exhibiting the Toxicity Characteristic

The Kimball facility may accept for storage or treatment wastes, which exhibit the Toxicity Characteristic and carry the waste codes D004 through D043.

Inorganic Metal Bearing Hazardous Waste

Inorganic metal bearing hazardous waste (IMBHW) has been defined as hazardous waste carrying any of the following characteristic or listed waste codes:

- D004, D005, D006, D007, D009, D010, D011;
- F006, F007, F008, F009, F010, F011, F012, F019;
- K002, K003, K003, K004, K005, K006, K007, K008, K061, K069, K071, K100, K106;

- P010, P011, P012, P013, P015, P029, P074, P087, P099, P104, P113, P114, P115, P119, P120, P121; and
- U032, U145, U151, U204, U205, U216, U217

Inorganic metal bearing hazardous waste (IMBHW) may not be accepted for incineration unless one (1) of the following six (6) criteria is met:

1. The waste contains hazardous organic constituents or cyanide at levels above the Universal Treatment Standards in 40 CFR 268.48;
2. The waste consists of organic, debris-like materials (e.g., wood, paper, plastic, cloth, etc.) contaminated with an IMBHW;
3. The waste contains greater than or equal to 5,000 BTU/LB as generated;
4. The waste is co-generated with wastes for which combustion is the required method of treatment;
5. The waste is subject to a federal or state requirement necessitating reduction of organics; or
6. The waste contains greater than 1% total organic carbon (TOC).
7. Labpacks containing one or more of the IMBHW waste codes may be incinerated without meeting one of the six (6) exemption criteria provided they are shipped using the alternative labpack treatment standard (40 CFR 268.42(c)) and none of the waste codes listed in 40 CFR 268, Appendix IV are present.

Gaseous Wastes

The Kimball facility may not accept for incineration gaseous wastes in compressed cylinders. The Kimball facility may accept wastes with these waste codes only if the gaseous compounds are dissolved or commingled with other wastes. The waste codes in this category are:

- P031, P033, P056, P063, P076, P078, P095, P096
- U029, U045, U075, U115, U135

The Kimball facility may accept the above waste codes for storage and subsequent offsite treatment and/or disposal without dissolving or commingling the gaseous compounds with other wastes.

Wastes with Treatment Methods other than Incineration

The Kimball facility may accept for incineration certain wastes with waste codes that list stabilization as the treatment method. These wastes are only accepted as commingled wastes in a form acceptable for incineration. The waste codes in this category are:

- K062
- U214, U215

Prohibited Wastes

The following materials are not accepted for storage or thermal treatment at the Kimball facility:

- PCBs (greater than 50 ppm);
- Hazardous Waste Listed as F020, F021, F022, F023, F026, F027, and F028;
- Radioactive Waste Materials;
- Class A and B Explosives as defined by 40 CFR 261.23(a)(6)-(8);
- Shock Sensitive Waste Materials; and Biologically Infectious Waste Materials.

On-Site Analysis/Acceptance

With each delivery of approved waste, a sample is taken from the load and tested to determine whether the waste is the same as the previously submitted sample. The sample is analyzed for the following parameters: physical description (phases/layers, color, physical state), density, corrosivity, free liquids, flowability, cyanide and sulfide screen, compatibility tests, radioactivity, water reactivity, ignitability and dioxin (suspected waste streams only).

If this analysis differs significantly from the advance sample, the waste will be deemed non-conforming. All non-conforming wastes are further analyzed to determine the best treatment alternatives, whether on-site handling at an adjusted price or transshipment to an alternative treatment facility. The customer is contacted regarding any non-conforming waste and given the option for alternate handling or return of their waste. On-specification shipments are processed with one or more of the storage or treatment operations previously identified.

5.0 Waste Storage

A wide variety of wastes not acceptable for on-site treatment can be received for consolidation and transfer to other Clean Harbors' sites or select audited and approved non company-owned sites. The facility includes storage areas for tanks and containers meeting all RCRA requirements.

Storage Capacities and Containment Volumes for Non-Bulk Containers Receiving, Storage and Staging Areas are shown in the table below.

Area	Drum/Bulk	Solid Capacity (cubic yards)	Liquid Capacity (gal)	55-Gallon Drum Equivalents (liquid)
25	Both	5,760	190,000	3,454
40	Drums	193	39,000	709
50A	Both (solid only)	360	N/A	N/A
50B	Both (solid only)	1,260	N/A	N/A
50D	Drums	254	51,480	936
50E	Bulk (liquid only)	N/A	11,820	Bulk Container Only
57A	Both	366	73,920	1,344
57B	Both	1333	269,280	4,896
57C	Both	103	20,790	378
70C	Both (solid only)	2,970	N/A	N/A
85	Both (solid only)	396	N/A	N/A
95	Both	4,050	290,800	5,287

Container Storage Areas

The Main Site Areas located outdoors and are equipped with secondary containment, meeting the regulatory requirements found in 40 CFR 264.175. Those areas that do not have collection sumps are only used to accommodate containers of ash/residue or waste containing no free liquids.

The non-contact areas are designed so that the pavement is sloped to direct storm water to surface drains. These drains are connected to a collection pipe system, which directs the storm water to a central sump. The water is pumped from the sump to a storm water holding tank.

Area 95 has been designed and constructed to provide 115,754 gallons (15,473 cubic feet) of secondary containment capacity. This containment capacity includes containment for 10% of the

volume of all containers stored within this area or the volume of the largest container, precipitation from a 25-year, 24-hour event, and firewater.

Area 25 has been designed and constructed to provide 120,600 gallons (16,123 cubic feet) of secondary containment capacity. This containment capacity includes containment for 10% of the volume of all containers stored within this area or the volume of the largest container, precipitation from a 25-year, 24-hour event, and firewater.

The contact area pavement of Area 95 and Area 25 is sloped to direct storm water to surface drains. The water is pumped from each collection sump to a storm water holding tank.

The total storage capacity for the Main Site Areas, Area 95 and Area 25 is 8,724 tons of hazardous waste.

Area 40 has been designed for the storage of up to 1,200 non-bulk containers. The area has been designed and constructed to provide 18,274 gallons of secondary containment capacity. This containment capacity includes containment for 10% of the volume of all containers stored within this area as well as for the precipitation resulting from a 24-hour, 25 year precipitation event.

The Warehouse storage area (Area 57B) contains three-tiered storage racks for bulk/non-bulk container storage. The racks provide enough height for one pallet per tier. Containers may be stacked on the pallet and then shrink wrapped provided that the containers are less than 55 gallons and the height of the stacked containers is less than or equal to the height of a 55-gallon drum. The racks provide stability and even load distribution for stacking of pallets. The storage racks along with the aisle spacing within the storage areas provide the clearance necessary to store or receive a single pallet without disturbing the palletized containers located above, below, or next to it. This rack storage design minimizes the container handling requirements when a single container pallet needs to be removed for processing, repackaging, or shipment.

The Shredder Staging Area (Area 57C) will be used to stage containers for processing in the dual shredder tower proposed for future construction. The Shredder Staging Area is split into 12 staging rows. It is not anticipated that incompatible materials will be stored in Area 57C at the same time. If the facility finds it necessary to do so, the incompatible materials will be placed on containment pallets sized to contain the largest container of the pallet.

In Area 57A, each of the 16 receiving rows where sampling occurs have contain a grate-covered sump designed to contain sixteen 330 gallon totes (or equivalent) plus fire water.

In Area 57B, each tier of racks has a metal containment pan at the bottom that holds 360 gallons and extends 8 inches beyond the edge of the rack to collect potential leaks from the stored containers.

Railcar Transfer

The facility has the ability to receive and ship railcars of liquid and/or solid hazardous waste via the Clean Harbors facility located in Sterling, Colorado. The Sterling facility meets all RCRA requirements for a transfer facility and is permitted by the Colorado Department of Public Health

and Environment. Solid hazardous waste containers may also be received by rail at the rail siding in Kimball, approximately 5 miles north of the facility.

6.0 Process Description

Blend Analysis

Prior to incineration, each separate waste feed stream is analyzed for the following feed control parameters:

- Total Halogen Content;
- Total Sulfur Content;
- Metallic Constituent Analysis (Sb, As, Ba, Be, Cd, Cr, Pb, Hg, Ni, Se, Ag, Tl, Va)
- This data is used to monitor the parameters that limit the feedrate to the TOU.

Incineration

The Kimball facility waste treatment system is a fluidized bed hazardous waste incinerator consisting of a combustion system, feed systems, an ash handling system, and an air pollution control (APC) system. Stack gases are sampled and analyzed by a Continuous Emissions Monitoring System (CEMS). The incineration system is controlled by a computerized distributed control system (DCS) which monitors and records process and CEMS parameters. The DCS initiates an Automatic Waste Feed Cutoff (AWFCO) prior to a permitted parameter exceeding its permit limit. The high-temperature destruction of hazardous and industrial waste destroys up to 99.99 percent of all hazardous constituents.

Combustion System

The combustion system and ancillary equipment are called the Thermal Oxidation Unit (TOU). The TOU is a rectangular fluidized bed incinerator consisting of three separate zones called the primary combustion chamber (PCC), the secondary reaction chamber (SRC), and the prequench chamber. The TOU is lined with refractory and has inside dimensions of 7.5 feet wide by 15 feet long by 59 feet high. The cross-section area of the TOU is 112.5 square feet.

The PCC is the fluidized bed portion of the TOU. The auxiliary fuel, fluidizing air, and the four main waste feeds are introduced into the system and are thermally oxidized in the PCC. The SRC allows additional reaction time for complete combustion of the off gases from the PCC.

The prequench chamber consists of the top 16 feet of the TOU. The prequench chamber cools and conditions the combustion gases exiting the TOU prior to entering the off-gas treatment system. Water is atomized into the combustion gases to cool the gases to a temperature ranging from 950° F to 1300° F.

Blended fuel oil is used as an auxiliary (nonwaste) fuel for the TOU. Twelve auxiliary fuel oil nozzles are located around the PCC, which inject fuel oil directly into the fluidized bed. Fuel oil is injected only after the bed temperature has been increased to acceptable levels using preheated fluidizing air.

Waste Feed Systems

The TOU is capable of treating materials from five waste feed systems:

- Energetic Liquids
- Leanwater
- Dry Solids
- Wet Solids
- Direct Feed

Air Pollution Control (APC) System

The TOU's APC equipment includes the following equipment:

- Spray dryer absorber (SDA)
- Powdered activated carbon (PAC) injection system
- Fabric filter

Spray Dryer/Absorber (SDA)

The purpose of the SDA is to condition the gases for the fabric filter, to neutralize acid gases, and to collect and remove gas-borne ash and dried salts. The design inlet and outlet temperatures are approximately 1100° F and 400° F respectively.

Off-gases flow down through the SDA and are sprayed with a lime slurry that provides evaporative cooling of the off-gas. Neutralization of the acid gases is achieved through absorption and reaction with the lime. The lime slurry is injected in the SDA through a rotary atomizer. The lime slurry flow rate is controlled to meet acid gas neutralization and gas cooling requirements. Dried salts and ash collect in the bottom of the SDA and are removed through a rotary valve and discharge screw to the ash conveyor.

Powdered Activated Carbon Injection System

Powdered activated carbon (PAC) is injected into the off-gases exiting the SDA prior to entering the fabric filter. The PAC system is designed to control flue gas emissions by mixing activated carbon with the flue gas. The PAC system consists of a storage container, rotary valve, volumetric feeder, venturi eductor, and an air blower used to convey the carbon.

Fabric Filter

The fabric filter is a modular design with six independent filter banks operating in parallel. The filter bags are designed to remove particles from the gas stream as it flows through the bags. Short blasts (pulse jets) of compressed air are blown into each bag to dislodge and remove the ash and carbon particulate adhering to the outside of the filter bags. The particles are collected in the baghouse hoppers and are transferred to the ash conveyor through rotary valves and discharge screws.

Continuous Emissions Monitoring System (CEMS)

The permanently installed CEMS monitors the stack gases for the following parameters:

- Carbon monoxide, CO
- Oxygen, O₂
- Sulfur dioxide, SO₂
- Nitrogen oxides, NO_x
- Opacity
- Particulate

A sample of the stack gas is continuously withdrawn through a sample extraction and conditioning system and transported to the analyzers. The carbon monoxide analyzer is a nondispersive infrared type. Both a paramagnetic and a fuel cell analyzer monitor oxygen. The sulfur dioxide analyzer is an ultraviolet type. A chemiluminescent-type analyzer determines nitrogen oxide concentrations in the stack. Stack opacity is monitored using a double pass chopped beam light system. Particulate is monitored using Triboelectric instrumentation.

7.0 Closure Plan

A comprehensive facility closure plan has been developed in accordance with RCRA requirements and is available at the site for inspection upon request. A Certificate of Insurance guarantees financial assurance for closure.

8.0 Insurance

Clean Harbors and its subsidiaries maintain General Liability and Automobile Liability insurance with aggregate limits of \$30,000,000. The Company purchases Environmental Impairment Liability insurance for its' waste facilities with limits of \$30,000,000 insuring the Company against liability for sudden and accidental occurrences from the time waste is picked up from a customer, while being handled at the Company's treatment and transfer facilities, through its delivery to a disposal site. See attached copy of Certificate of Liability Insurance.

Clean Harbors purchases an insurance program for Closure (Post-Closure and Corrective Action where so required) in amounts that meet regulatory requirements.

Clean Harbors' Casualty Insurance Program Summary

Policy	Limits of Liability
Workers Compensation & Employer's Liability	Statutory \$1,000,000 Each Accident
Business Automobile Liability (Includes MCS-90 Endorsement)	\$1,000,000 Each Occurrence \$5,000,000 MCS-90
Comprehensive General Liability	\$1,000,000 Each Occurrence \$3,000,000 Aggregate
Excess (Umbrella) Liability (Follow Form)	\$30,000,000 Each Occurrence \$30,000,000 Aggregate
Wharfingers Liability	\$10,000,000 Any one Vessel/Any one Accident
Contractor's Pollution Liability (Off-Site)	\$10,000,000 Each Occurrence \$10,000,000 Aggregate
Protection and Indemnity	\$1,000,000 Each Occurrence/Any one Vessel
Environmental Impairment Liability (Coverage for Clean Harbors Facilities)	\$3,000,000 Each Occurrence \$6,000,000 Aggregate
Excess Pollution Liability (Sudden and Accidental Occurrences)	\$30,000,000 Each Occurrence \$30,000,000 Aggregate
Total coverage for Pollution incidences that occur during transportation related activities	\$30,000,000 Limit

For more detail concerning Clean Harbors' coverage, please contact the Clean Harbors Risk Management Department at (781) 792-5000.

Facility Closure Certificate

<http://clark.cleanharbors.com/tt/sl.ashx?z=219847c5&dataid=640&ft=1>

Certificate of Liability Insurance

<http://clark.cleanharbors.com/tt/sl.ashx?z=219847c5&dataid=98&ft=1>

9.0 Financial Information

Financial information on Clean Harbors and its subsidiaries are available from the Clean Harbors website in the Investor Relations section.

http://www.cleanharbors.com/investor_relations/investment_materials.html

10.0 Appendix

If applicable, supporting facility documentation will follow.



**CITY OF TUCSON/PIMA COUNTY HOUSEHOLD HAZARDOUS
WASTE PROGRAM AUDIT RATING WORKSHEET**

Facility: Clean Harbors Environmental Services – Kimball Facility
Date of Audit: June 13, 2013

Category	Y	N	NA	Not Rev.
1. Does the facility have the required insurance?	X			
2. Does the facility have the required permits?	X			
NPDES	X			
AIR	X			
TSDF	X			
IWW			X	
PCB			X	
UW			X	
DOT	X			
	Rating	N/A		Not Rev.
3. Financial history	10			
4. Compliance history	8			
5. Safety history OSHA	10			
6. Regulatory compliance				
Air	8			
hazardous waste/materials	8			
water	10			
UW		X		
PCB		X		
Other				
7. Fire	8			
8. Documentation	10			
9. Written plans	10			
10. Facility Maintenance	10			
11. Env. Consciousness	10			
12. Liability actions	10			
13. Community risk	9			
	Total Score: 121			
	Average Score: 9.3			

Notes

1. Rating scale is 1 to 10, with 10 the best rating.
2. N/A = Not Applicable.
3. Not Rev. = Not Reviewed
4. An average score of 5 or less requires a re-visit of the facility before use and approval can be given.