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

Facility: Clean Harbors Environmental Services – Deer Park Facility
Date of Audit: October 7, 2013 – October 8, 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	7		
5. Safety history OSHA	8		
6. Regulatory compliance			
Air	7		
hazardous waste/materials	7		
water	10		
UW		X	
PCB	10		
Other (wastewater treatment)	7		
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	8		
Total Score:	**132**		
Average Score:	**8.8**		

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.

TUCSON/PIMA COUNTY
HOUSEHOLD HAZARDOUS WASTE PROGRAM

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

FACILITY AUDIT REPORT

Source Audit #: FA13-002 **Date:** 10-07-13 **Inspector(s):** Don Campbell
Frank Bonillas

Source: Clean Harbors Environmental Services

Location: 2027 Independence Parkway South, La Porte Texas, 77571

Arrival Time: 8:40 a.m.

Departure time: 6:00 p.m.

Photographs: Yes **Samples:** No

Reason for inspection: Facility Audit

Inspection Type: X **Announced** _____ **Unannounced**

GENERAL INFORMATION:

Name and title of official(s):	Mr. Luis A. Benavides, Compliance Specialist	281.930.2439
	Mr. Jesse L. Hicks, Senior Health & Safety Manager	281.930.2300 x.2412

Facility Description

Clean Harbors Environmental Services operates a hazardous waste treatment, storage, and disposal facility (TSDF) located in La Porte, Texas. The Deer Park 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 Stericycle Specialty Waste Solutions, Inc. and transported to the Clean Harbors Environmental Services TSDF located in Phoenix, Arizona. HHW materials are transported to the Phoenix facility for 10-day storage and Clean Harbors Environmental Services transports directly to the Deer Park facility. Waste materials shipped directly through Clean Harbors Environmental Services from the HHW Program and stored at the Phoenix facility can also be shipped to the Deer Park facility.

The Deer Park facility is located on Independence Parkway South, 1.5 miles north of Highway 225. It is located in a heavy industrial area. The facility perimeter is secured by fencing and gates. The property consists of 145 acres: 136 acres are in active use, 51 acres are for plant operations, 85 acres are for the south, north and east landfills, and 9 acres are not in active use, which includes unused land, undeveloped land, and buffer areas from neighboring facilities. The entrance and surrounding property is lush with vegetation and animals. Additional facility descriptive is included in the completed TSDF Audit Questionnaire Form.

The Deer Park facility incineration system consists of two incineration train units. Train 1 has a permitted thermal capacity of 180 MM BTU/hr and includes a 3.6 meter diameter slagging rotary kiln, a horizontal after burner, and a Loddby liquids burner. Train 2 has a permitted thermal capacity of 213.5 MM BTU/hr and includes a 4.4 meter diameter slagging rotary kiln, the Rotary Reactor (RR), and a vertical afterburner. Each train is equipped with an air pollution control system, which incorporates a Lurgi Venturi saturator, dual packed tower condensers, a Calvert collision scrubber, a mist eliminator, a wet electrostatic precipitator (WESP), and a selective catalytic reduction system for removal of NOx emissions. This facility also includes a landfill for disposal of delisted ash, a Stabilization and Encapsulation (S&E) facility, a process water treatment operation, and an analytical laboratory for waste analysis. Stack gas emissions from the rotary kiln incinerators are continuously monitored. The Texas Commission of Environmental Quality (TCEQ) monitors operations by conducting a variety of on-site inspections, the US EPA also inspects this facility every two years, and the Harris County Pollution Control Department inspects for wastewater discharge operations. The residual ash from the incinerators is delisted and disposed of on-site in a RCRA Subtitle D landfill. Ash failing land disposal restrictions are treated in the S&E operation to meet land disposal restrictions and landfilled on-site.

The Deer Park facility thermally treats liquid, sludge and solid non-hazardous and hazardous wastes. Typical waste streams include petroleum hydrocarbon contaminated soils, halogenated and non-halogenated organic (solvent) waste sludge and liquids, residues from the chemical process industry, PCB wastes, RCRA listed hazardous waste, contaminated process wastewaters, and chemical spill cleanups. A complete list of waste streams included in the Facility Audit: Deer Park, attachment 6. The rotary kiln units operate at 99.99999 percent destruction. This facility consists of a variety of chemical receiving and storage buildings, chemical tank farm, support buildings, administration buildings and a landfill. All facility components are described below as part of the facility walk-through inspection.

Facility Walk-through Inspection

Upon arrival strict security procedures are followed at the entrance by security personnel. We were required to sign in and watch a safety video. We were then issued badges and were directed to the administration building to meet with Mr. Luis Benavides 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.

Pre-shipment

Waste acceptance at the facility follows procedures set forth in the site's Waste Analysis Plan (WAP). The WAP is incorporated into the facility's RCRA Part B Permit. Prior to waste acceptance for shipment, profile and analytical data of the waste, the waste is reviewed for regulatory compliance, health and safety, and the facility's handling capabilities.

Waste Shipment Receiving

All incoming wastes are subject to a compliance and conforming load review and verification prior to acceptance or discharge to the plant. The compliance phase includes a review of the shipping documents, which targets the manifest, Land Disposal Restrictions (LDR) Certification, and re-verification of EPA waste codes and associated paperwork. The conforming load review ensures that the load conforms to the waste stream profile and that it can be processed safely and in compliance with current federal, state and facility permit requirements. Once both are met the discharge is made. Discharge generates documentation accompanied by a Waste Safety Sheet, along with the individual barcode labels for tracking and disposal planning.

Truck Scale

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

Sample Bays

After weighing, bulk shipments enter the Sample building, which consists of two (2) bays. Waste samples are taken and sent to the laboratory before accepting the waste. Tanker trucks and roll offs are tested for V.O.C.'s and radiation. Any truck that does not pass the radiation test is rejected. This area is also equipped to control leaking bulk containers. It is equipped with large carbon filters (blue cylinders) to capture fugitive emissions. This area was visually clear of any debris outside the bays.

Sumped Staging Area

Roll off containers that show signs of leaking material and those that fail the paint filter test are sent to this area for secondary containment. These containers bypass further storage procedures and are pumped directly into the incineration process. Operations are inspected daily. This area was visually clear of any debris outside the staging area.

North Tanker Truck Unloading Area/Railcar Unloading Area

This area is used to empty bulk truck shipments and railroad cars that contain hazardous and non- hazardous wastes. The trucks and railroad cars are pumped into compatible tank storage (tank farm) for later incineration. This area is sloped to contain any leaks or rain water runoff into a sump area. Sump contents are collected, tested and either sent to the wastewater treatment facility or directly to the afterburner for incineration.

Transformer Building

This building houses the Lab Pack area and Drum Transfer area. The lab pack area is used to unpack all accepted lab packs and repack them into smaller containers. The drum transfer area is used to transfer compatible liquid wastes into tanker trucks and then the tankers are transferred to the Tanker Truck unloading area. These tankers are directly fed into the incineration process. Incompatible wastes are sent straight to the incinerator from the tanker truck or rail car. All drums are shredded and fed into the incinerator. This building is also referred to as the PCB area. Fire extinguishers and eye wash/safety shower stations are placed throughout this building. SCBA's are also placed throughout the property. Inspection tags on safety equipment were clearly marked with the prior month's inspection date.

Receiving Warehouse

All drums, totes and boxes are received into this building. Each container is assigned a barcode label and tracked from receiving to incineration. Random waste samples are taken and sent to the on-site laboratory for analysis. This is done to insure the waste matches the profiles. Any waste that does not meet its profile is then re-profiled. Each container is then sent to the appropriate storage area. Acids are stored on one side of the building and bases are stored on the opposite side of the building. High hazard wastes are stored in the high hazards warehouse. The high hazards wastes are stored on racks 4 high. Both the Receiving Warehouse and High hazards warehouse were both well organized, visible signage placed in each area, all containers labeled, and no debris was visible. Fire extinguishers and five eye wash/safety shower stations are placed throughout this building. SCBA's are also placed throughout the property. Inspection tags on safety equipment were clearly marked with the prior month's inspection date.

Train 1

Train 1 is a 3.6 meter rotating kiln that was installed in 1985 and used for solids incineration. This kiln replaced the 2.8 meter kiln that was installed in1971. The kiln is fed through an elevator that lifts the drums and boxes up to the kiln level and drops waste materials into the kiln via a conveyor belt. The control room handles the rate of injection of waste into the kiln. Ash drops down from the kiln into roll offs that are barcoded and tested for TCLP. Ash is landfilled on-site if TCLP test results are satisfied. If the container does not pass TCLP, the entire contents of the container are re-incinerated. The hot air from the kiln is transferred up the air ducts and passes through a condenser. The air is fed into the afterburner and the recovered liquids are injected into the afterburner for incineration.

Train 2

Train 2 operates the same as Train 1and consists of a 4.4 meter slagging rotary kiln, a Rotary Reactor and vertical afterburner. Train 2 was on turn around due to the refractory brick being replaced. The rotary kiln was installed in 1988. Waste materials (feed stock) loading of this unit is handled using a clam shell system for unloading roll-off containers and dropping the waste materials into the kiln. This building is operated under negative pressure and intake air is fed into the incineration system.

Rotary Reactor

This Rotary Reactor was installed in 1989 as an addition to Train 2. This reactor is used as a bulk solids burner. This unit was also on turn around and inoperable at the time of the inspection.

Control Room

The control room maintains all facility operations pertaining to Train 1, Train 2 and the Rotary Reactor. The control room was neatly organized and clean.

On Site Emergency Response Team

The Deer Park Facility operates a volunteer based Emergency/Fire Response Team with over 40 volunteer members. Their team includes 10 Emergency Medical Technicians (EMT) and 2 fire trucks. This facility operates 24 hours a day and 7 days a week. This facility is also part of the Members Channel Industries Mutual Aid (CIMA). An emergency siren system is utilized to notify employees and the surrounding public/industry of emergencies. The siren system is tested daily. The volunteer members are trained per OSHA 1910.120, 1910.134, 1910.156N, NFPA 600, Channel Industries Mutual Aid, and ICS Standard Operating Procedures.

Container Storage and Capacities

The Clean Harbors Deer Park facility has the capacity to store 1, 291, 00 gallons in RCRA drums, 376,500gallons of PCB drums, 289,500 gallons in Tankers/Railcars, 1,575,397 gallons in Bins and 855,500 gallons. Clean Harbors Deer Park facility does not have any underground storage tanks.

Wastewater Treatment Area

Water utilized in the gas quenching operation (scrubbers) is treated on-site in the water treatment plant prior to reuse or discharge. Quench water is pumped to a primary neutralization tank for partial neutralization with a lime slurry. Final pH adjustment is accomplished in a secondary neutralization tank with caustic. The quench water then flows into two clarifiers where metal hydroxides settle out as sludge. Treated water flows from the clarifiers to the cooling towers and recycled back to the gas quenching system. All process water is eventually discharged to Tuckers Bayou, which flows adjacent to the facility and empties into the Houston Ship Channel. This process is permitted through the Texas Pollution Discharge Elimination System (TPDES) wastewater permit. This water is treated through pH adjustment, metal hydroxide precipitation, and the addition of a flocculent/coagulant to enhance metal precipitation through lamella separators. Before discharge, this water is polished (pH adjustment if required) and piped to the check tank, where it is sampled and lab analyzed to meet TPDES Wastewater Permit parameters.

Process Water Residuals

The resultant sludge generated from the flocculation and precipitation of metal hydroxides is pumped to a set of horizontal filter presses. Most of the remaining water is separated from the sludge producing a filter cake. This filter cake is stabilized and tested for all LDR treatment standards and placed in the on-site landfill.

Storm Water Management

Facility storm water is collected into three storage tanks using sloping and rain channels. Storm water is either directly incinerated by adding it to one of the kilns or treated in the waste water treatment system. Treated water may be discharged through one of four permitted outfalls. This facility follows a Stormwater Management Plan.

Subtitle D Landfill

The landfills are permitted to dispose of on-site generated residuals. There are three onsite landfills; the North landfill (closed), East landfill permit issued in June 2007, and the South Landfill (closed 1996). The East landfill is currently active but was temporarily blocked by rail cars. This landfill could only be observed from a distance and materials were actively being deposited. Materials deposited may include ash, filter cake, RCRA empty drums and hazardous/non-hazardous waste and must meet all applicable land disposal restrictions and CHDP permit requirements prior to placement in the on-site landfill. The closed landfills are capped and are equipped with a leachate collection system, storm water collection system/channels, and groundwater monitoring wells. Collected leachate is pumped to a collection tank, treated on-site and discharged through one of the permitted outfalls. No visible debris was observed in this area and field grass grows on its surface. Lush vegetation and trees grow around this facility.

S&E Facility Operations

Ash that fails TCLP after incineration must be stabilized in the S&E facility before placing in the landfill. Because this facility operates with strict safety requirements and employee decontamination upon exiting the operation, internal inspection was not possible. The perimeter of the S&E facility was well maintained and no visible emissions were observed.

Analytical Laboratory

The laboratory consists of 4 sections. The Receiving laboratory processes incoming load paperwork, samples bulk tankers and bins and performs a variety of physical and chemical characteristic analyses on incoming waste streams. The Metals Laboratory performs analyses on incoming waste streams and wastewater generated onsite, and also conducts the TCLP test for on-site generated wastes. The Wastewater Laboratory performs analyses required by the USEPA, TPDES and TCEQ permits such as oil and grease, pH, TSS, BOD and TOC. The Environmental Laboratory routinely performs volatile and semi-volatile organics screening by GC/MSD and PCB analysis. The laboratory is well maintained and organized. Samples and reagents were closed and visibly labeled.

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 Deer Park 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), TPDES permit and Stormwater Management Plan, and financial and insurance documents (attached).

A supplementary OSHA Standards for General Industry inspection questionnaire/checklist was also completed (attached). This facility has a Total Recordable Incident Rate (TRIR) of 0.815. The TRIR is based on 200,000 man hours and a TRIR less than 1 is excellent by OSHA Standards. A TRIR greater than 1 is considered "Suspect", which indicates too many employee injuries.

Applicable Deer Park facility permits listed in the Deer Park, TX Facility Audit Package (attached) previously submitted by Clean Harbors.

A review of previous regulatory inspections and compliance violations was completed. A summary of violations dating from July 2008 to the present is attached. The Deer Park facility has a variety of violations that have been satisfactorily resolved with the respective regulatory agencies.

A hazardous materials waste shipment were reviewed and verified to ensure shipment was properly received and processed.

Waste Records

Tucson/Pima County HHW Program
2440 W. Sweetwater Drive
Tucson, AZ 85705
Manifest: 005719206FLE
Waste Shipped: UN1950, Aerosols [Poison, each not exceeding 1 L capacity], 2.2 (6.1)
Date Shipped: 3/27/13
Date Received: 4/5/13
Date Processed: 9/29/13

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 Deer Park facility is closely monitored by the Texas Commission of Environmental Quality (TCEQ).

Don Campbell
Lead Household Hazardous Waste Technician

Frank Bonillas
Environmental Services Superintendent

TREATMENT

STORAGE

DISPOSAL

FACILITY

AUDIT QUESTIONNAIRE FORM

FOR: Clean Harbors, Deer Park, TX

LOCATED: 2027 Independence Parkway
La Porte, TX 77571

PHONE # 281-930-2439 FAX # 281-930-2314

CONTACT (S) Luis Benavides

AUDIT DATE (s)

October 7 - October 8, 2013

GENERAL INFORMATION

History of site:

Year current operation began 1971

Previous owner(s) dates 1969

Previous use : Non-Industrial Gulf Coast land

Environmental problems caused by: Not a superfund site. Lagoons abated.

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

Proximity to:

Residences: 2 mi.

Farmland N/A

Waterways: Tucker Bayou - 100' adjacent to property line.

Any waterways drinking water source ; distance: None

Wetlands None

Public facilities None - Industrial

Schools: 2 miles

Flood Plain : No ever flooded? No

Private Drinking water wells: None

Public Drinking water wells : ~~None~~ 2.5 miles

Wastes not accepted: listed on Facility Audit Rpt, Attach. C

Any future modifications planned? None

Life expenctancy: ~~Facility~~ - indefinite

landfill - 5 years

Any other off-site facilities utilized for additional treatment, disposal and/or recycling of H.W. generated by the facility? None

SITE DESCRIPTION

Size: 145 Acres

Topography: Coastal flatlands

Hydrogeology Chicot & Evangeline aquifers

Surface to water depth 300-500 ft & 620-1500+ feet

Run-on/run-off controls - collected using grading and sumps.

Prevailing winds S-SE

OSERVATIONS

Plant life health: Green grassy, bushtrees in surrounding areas

Animals: rodents

Liquids coming from plant N/A

Fencing, signs, condition: good

Air emissions: None.

Odors: Industrial odors

Noise: Industrial

Rail spur into facility: YES.

Emergency notification alarm for surrounding area: on-line emergency notification system. Channel 2 CIMA, sirens for internal shelter in place sirens around the community.

Facility consists of: Kilns and ancillary equipment, landfills

Other ancillarly operations including any non-hazardous operations? S & E facility, rail spur.

DESCRIPTION OF OPERATIONS

Current operations	permitted: Y	N	NA
Chemical treatment	—	—	—
Neutralization	—	✓	—
Oxidation	✓	—	—
Other (Wastewater treatment	✓	—	—
Physical treatment	—	—	—
Solidification/stabilization	✓	—	—

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

GENERAL FACILITY STANDARDS

SECURITY

Is facility's entry secure? Y
Are "Danger – Unauthorized Personnel Keep Out" signs easily observed? Y
Are they in Spanish also? N

DOCUMENTS

Are required documents on site? Y
Are training records retained for at least 3 years? Y
Do inspections include: inspector, date, observations, problems, corrections? Y

PERSONNEL TRAINING

Is training provided to applicable job duties? Y 40hr HAZWOPER
Does it include emergency response? Y
Is training program complete? Y Y
Is training given within 6 mos. Of hiring? Y
Are records maintained for 3 years? Y

IGNITIBLE, REACTIVE OR INCOMPATIBLE WASTES

Does plant meet:
"No Smoking" signs? Yes
Protected from ignition sources? Y
Proper handling? Y

OPERATING RECORD

Does it describe:
Description and quantity of each haz. waste? Y
Method and date of treatment storage or disposal? Y
Location of each waste within the facility? Y
Closure cost estimates? Y

PERSONNEL TRAINING

Who provides training? John McKinney, Training Instructor/Mgr.

Are they qualified? Yes

Is there initial classroom training that is site specific? Yes

How is understanding of material verified? Written and practical w/Supervisor

Does the new employee receive on the job training before going solo? Yes
Does the new hire supervisor sign off before going solo? Yes
What kind of training programs are provided to employees? General and job specific

How often are these programs offered as refreshers? Once per month for job specific.
Annual requirements: 8hr OSHA

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

GENERAL FACILITY STANDARDS

SECURITY

Is facility's entry secure? Y
Are "Danger – Unauthorized Personnel Keep Out" signs easily observed? Y
Are they in Spanish also? N

DOCUMENTS

Are required documents on site? Y
Are training records retained for at least 3 years? Y
Do inspections include: inspector, date, observations, problems, corrections? Y

Are mock drill held to exercise emergency procedures? Yes, once per year

LABORATORY

Does the facility have an analytical lab? Yes
% of containerized wastes tested? 10-15%
% of bulk liquid wastes tested? 10-15%

Lab analytical capabilities:

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

Equipment used:

AA (No)	✓ICP	& GCS (Gas Chromatography)
✓TCLP extraction	✓wet chemistry	

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

Lab manager's education? B.S. & Randolf-Jackson, Lab. Mgr.

Is third party lab used for any reason? Yes, Stormwater discharge & Stormwater discharge

EMERGENCY COMMUNICATIONS

Does the facility have an internal communication alarm system to warn employees? Yes
Describe? siren system

Communication equipment tested how often? weekly
What system is used to warn those off-site? CMA Channel 2, mail system.

How are emergency agencies summoned? Phone call & on-site volunteer Fire Dept.

Does the facility have trained first responders? Yes
What are they capable of doing? Swimlines, 1st aid, full response

What kind of PPE do they have available? Fire Engines, SCBA, Turnouts (Full Fire Dept - Volunteer)

What kind of fire control equipment is available?
2 Trucks, Portable fire extinguishers & fire watertank foam suppression (Nitrogen blanket foam)

Is there an adequate water supply?
Yes, 800,000 gallons

Have arrangements been made with local emergency response agencies? Yes, LEPC
Describe arrangements and with whom? LEPC

Has facility dealt with an emergency where response was necessary? NO

Was soil, groundwater, surface water or equipment contaminated? NO

Was proper remediation done? N/A
Approved?

Have any materials exceeded their RQ's for reporting" N/A

Was reporting done within required time limit? N/A

LOADING AND UNLOADING TRUCKS

Is there a no smoking policy? Yes
Are signs easily seen? Y

Is handbrake on while unloading or loading? Y – tankers disconnected from truck
Is a qualified person in attendance? Y

For flammable cargo:
Is engine off? Y
Grounding? Y (Tankers & railcars & drums transfer)

For corrosive cargo:
Nitric acid not stored above other materials? N
Manholes and valves closed? Y

Placarding of vehicle done according to 49 CFR requirements? Y

TRANSPORTATION

Does facility transport it's own wastes? Y (only on-site) * offsite & straight clean. Harbors Env. Not Deer Park
Describe type and number of vehicles? Yardmules – swaee tractor units
Bobtrucks

What states are vehicles permitted in? Texas – don't leave site

Are liability insurances met? Y

Any DOT citations, violations? N

Are drivers CDL trained? N — don't leave site.
Are drivers trained on how to deal with H.W. spill? Y
Who responds to remediate? Internal Hazmat team

Are vehicle inspection reports complete and available for review? Y

Are vehicles maintained in good condition? Y

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

If transportation is contracted out, does this facility audit the transporter? Y

SHIPPING/MANIFESTING

Does facility ship hazardous waste? Y
Examples of destinations? offe TSDF

Do facility personnel prepare material for shipment? Y

What is training and experience of these employees? Monthly modules & job specific

Are drums recycled? N
If not used again, what is done with containers facility receives? landfilled, shredded, incinerated.
If tripled rinsed, what happens to wastewaters? on-site incineration of wastewaters

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

Are shipping papers properly prepared by knowledgeable personnel? Y

IMPORT/EXPORT

Does facility import or export.hazardous waste? Y — import (Canada, Guam, MX, Puerto Rico)
N - export

If yes, from or to where?

What types of wastes are imported/exported? All waste codes.

Who transports? 3rd party.

DISCHARGES

Does this facility discharge to the AIR – WATER – SOIL

AIR:

Does facility maintain an Air Emissions Inventory? Y
Is site required to have a permits and controls? Y
TitleV – permit # 01566 date permitted: 11/12/2007
Minor source – state permit? N/A when was status determined? _____

Does facility have point source emissions? Y (incinerator); (boilers) ~~#~~

From hazardous waste? Y Used as fuel N disposal only Y
From non-hazardous waste? Y Used as fuel N disposal only Y

Other non-waste fuel sources? Nat gas for startups or fuel oil

Does the facility produce fugitive emissions? Y Source? tank farm
Does facility conduct ambient air sampling? N
If required, how often? N/A
Any exceedences? N/A

AIR POLLUTION CONTROL DEVICES:

Air washer
Catalytic incinerator
Dry filter
Fume scrubber
Y Scrubbers (name specific ones)
Y baghouse @ S+E
cyclone collector
Y electrostatic precipitator (WESP)
oil mist collector

Lurgi Venturi saturator
Dual Packed tower condenser

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

Does the facility have an incinerator(s)? # 2 (Kilns) For H.W. For non-H.W.
When was it permitted? 1988
Are there CEMs? Y
How often are they calibrated? weekly & drift testing - & quarterly & annual

Are permits and emission documentation on file? Y

Are there any future plans to change equipment and/or processes that might affect air quality? N/

Have there been any enforcement actions, consent decrees, fines, etc, against the facility? YES (listed on compliance history)

WASTEWATER

POTW

Does the facility discharge into a POTW? N
Is a permit and testing required? N/A Permit #_____ date:

Has the facility had any violations regarding illicit discharges? Y

Has the facility had any reportable discharges? N

Wastewater treatment permitted under TPDES - Permit 01429.

SEPTIC

Does the facility discharge into a septic field? N

Is the facility permitted to do so? N/A

INJECTION WELLS

Permit # N/A date:
Does the facility dispose of waste into injection wells? N

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:
Leachate
contaminated groundwater
Misc. wastes from labs, unloading/loading areas etc.

Contaminated stormwater from:

NPDES

SIC 4953

Is the facility permitted to discharge stormwater? Y # WQ 0001429000 date 10/12/2011
_____ date

Does the facility comply with all Sector K requirements? *

Has facility implemented a stormwater PPP? Y
Sampling requirements? Y
Outfalls sampled? # 002 003
Documentation and reporting?

Have there been any enforcement actions, consent decrees, fines, etc, against the facility? N.

LAND

Does the facility have a Subtitle D landfill? Y # 50089 Date 1988
Does the facility have a Subtitle C landfill? N # Date _____
Do these require air permits; Y (NSPS) Sampling? N

Is the Paint Filter Test used to prevent the acceptance of bulk liquids into landfills? Y
Is procedure in waste analysis plan and in operating record? Y

For Subtitle C landfills does the facility have:
A list of haz. wastes placed or to be placed in landfill? N/A
Location of each H.W. and type?
Control of particulate wind dispersal and
Run-on/run-off controls from a 25yr event? Describe:

Leachate collection system(s) /leak detection/inspections?
Weekly recorded amounts from each system sump?
Liner(s) /leak detectioninspections?
Cover system?
How are incompatibles placed so as not to cause a reaction?
Are containers at least 90% full or crushed?
Are lab-packs landfilled? I sufficient sorbent used?
Has an action leakage rate been proposed and response action plan?
Is the monofill 1/4mi. or more from drinking water source?
How will wastes and residues be removed at closure?

Waste Management plan for EPA ID# F021, 22, 23, 26, 27 addressing migration to ground and surface water?
Before placing treated waste on the landfill are tests performed to determine the concentration of TCLP constituents?
Are treated "listed" hazardous wastes placed on the landfill?
Are there any "closed" cells?

Surface Impoundments? N *Part 270.17*

Have inspections been documented weekly for:
Free board?(daily) Impoundment vegetation and dikes?(weekly
For each new unit (after May '85) does the SI comply with:
Two or more liners? Leachate collection?
Notification 60 days prior to receiving waste?
Certification by qualified engineer of integrity of dikes? N/A
Inspection of liner, leachate detection system etc.?

Run-on/run-off controls?

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

How will wastes and residues be removed at closure?

WASTE PILES? N *Part 270.18*

Has the facility listed the hazardous wastes placed in waste piles?
Is treatment done on the pile?
If yes, are procedures detailed, equipment used and residuals?

Inspection of liner, leachate, detection system etc.? N/A

Run-on/run-off controls?

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

How will wastes and residues be removed at closure?

Have there been any enforcement actions, consent decrees, fines, etc, against the facility?
If yes, when?

GROUNDWATER

Is the facility required to perform ground water monitoring? Y

Is groundwater already contaminated? N
If yes, was water contaminated by prior owner(s)? Y when detected? 1985

Or, was it contaminated by present facility? Y
Or required in case contamination occurs?

Is there a consent decree and or permit with regulatory agency? M, corrective action
What is required of you to remediate contamination? groundwater remediation system (pump-and-treat) Plan w/ TCEQ

How many wells? 157 Upgradient?
What does the system include: Groundwater Monitoring & Remediation Systems listed on Facility Addt. page 21.
How long before contamination is remediated? ~~###~~ continuous remediation
Does the groundwater monitoring system meet requirements? Yes, Phase II Corrective Action Plan

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

RCRA STORAGE REQUIREMENTS

TANK SYSTEMS *Subpart J* *(free liquids & outdoors or free liquids inside a building with permeable floor)*
What wastes codes are stored? listed on audit Pkg

Existing	number	total capacity	above or underground
Permitteed			
Interim status			
Accumulation			

Are tanks marked with contents? ~~#~~ N (Hazard. class only) Any state requirements? Y Tank #. and "Hazardous Waste"
Have existing tanks without sec. containment been assessed by IQRPE? N/A
Are record on file? All on Sec. Containment

Do tanks have secondary containment, required freeboard, (above ground) leak detection system? (underground), cathodic protection? Y
What make up the containment? (dikes,Berms, walls; how high)? concrete walls, >3 feet

Are annual leak detection tests none? Y

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

Are ignitable and reactive wastes rendered non hazardous or prevented from igniting or reacting before placing in a tank? Y

Is care taken to not cause tanks, ancillary equipment and secondary containment to rupture, leak, corrode or fail? Y — inspections

Have any leaks, ruptures or incompatible reactions occurred on any haz. waste storage or treatment tanks? N

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? Y

Is container area covered? Y

What kind of containers are accepted:
✓ 55g drums
✓ bins
✓ totes
other

What is max. number that can be stored? listed on audit pkg by type.

Are they stored in secondary containment? Y Bermed? Y

How high? 6' M Pallets in between? Y

How far apart? 2 feet

Are containers maintained in accordance with requirements
✓ Good condition
✓ Closed during storage
✓ Labeled properly
Additional state requirements N/A (Federal)
✓ Inspected weekly (daily)
✓ Inspections documented
✓ Compatible with waste

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

How are incompatibles separated? (barriers, distance) Berms

Are flammables 50' or more from property line? Y

What kind of fire suppression in storage area? Fire extinguishers
When last serviced? Sep.

What kind of spill control? (Sumps) Berms, sumps

What kind of personal safety equipment? safety shower eyewash, proper PPE, SCBAs

Is PPE appropriate for haz. waste being handled? Y

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 %?

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

Are these visually inspected at joint, seams, etc. at lease 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 maintainedper 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 #? Y
(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? Y

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) Y

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.) Y

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) Y

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

Is a semi-annual report submitted to the regional administrator and includes the items in 264.1065? Y

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.

N/A

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

N/A

Does facility have such a building? 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? Y Maintained on site? Y
Is it fully funded or funded through time? Y

Amended when necessary? Y

Is the amount of $ for closure based on "worst case closure" analysis? Y

Who made determinations? Y

Is annual cost adjusted for inflation? Y

If a landfill, does the postclosure include care and monitoring for 30 years? Y

Does it include the maximum permitted waste inventory? Y

Does it include third party labor costs? Y

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

Does it include the estimate of life of facility? Y

FINANCIAL ASSURANCE

Name and address of legal owner of facility? Y

Form of ownership? ✓

Ins. Certificates attached. 9.11 audit pkg.

List types of insurance held by facility. Multi-site under one policy?

Type	amount	carrier
Workman's comp.		
General liability		
Auto		
Environmental		
Off-site injury, property Damage, cleanup		
third party costs		

Any specific exclusions?

Is facility self-insured? N If yes, how funded?

Have any environmental claims been made for damages? N

Does the facility generate an annual financial report? Y

Is the company a private or public? Public

OSHA STANDARDS FOR GENERAL INDUSTRY
INSPECTION QUESTIONNAIRE

Has the facility ever had an OSHA inspection? Y

If yes, what was brought the inspection on? disgruntled employee - fall protection - forklift

Is a report available for review? Y

HAZARD COMMUNICATION

Do you have a written haz? com. Program? ✓
1910.1200 (b)(3)

Are all haz. chemicals used in the la labeled and maintenance areas? ✓
Are MSDSs available on all chemicals? ✓
Are MSDSs readily accessible during all work shifts? ✓
Are employees trained upon being hired? ✓
Are employees trained on labeling system, MSDSs and haz. info. Use? ✓ SDS / GHS
Are employees trained on how to protect from hazards including safety ✓
procedures, work practices, emergency procedures and PPE? ✓

COMPRESSED GASES
General requirements

1910.101
are cylinders properly labeled? ✓
Are cylinders inspected to determine their condition? ✓
Do cylinders have pressure relief valves and caps in good condition? ✓
Are cylinders properly secured and upright while stored or in use? ✓
Are cylinders with flammables stored away from ignition sources and grounded? ✓
Is adequate fir protection in place? ✓

FLAMMABLE AND COMBUSTIBLE HANDLING PROGRAM
1910.106
before placing in service were tank strength and tightness tested? ✓
Are flammables or combustibles stored in tanks? ✓
Is tank material compatible with liquids? ✓
Are tanks low, high or atmospheric pressure? ✓
Are tanks underground or above ground?
Do venting systems prevent buildup of pressure or vacuum? ✓
Are pipe joints liquid tight? ✓
Are underground Tanks built on 6" or more of inert material? N/A
Are on-ground foundations built to prevent settling and corrosion? ✓
Are there tanks inside buildings? NO

Are connections vapor and liquid tight? ✓
Are tanks provided with overflow protections? ✓
Types of alarms? ✓
Are tanks located in a flood plain? NO
If yes, what contingencies are there in place?
Are tanks in secondary containment?
Earthen? Concrete? Height of berm?
Are class 1 and class II liquids stored in storage cabinets? ✓
Do the amounts exceed 60 gallons? NO
Are the cabinets fire resistant? ✓
Is adequate ventilation (6X/hr) provided for storage rooms? ✓
How is it accomplished? Blowing.
How is dispensing of liquids done? (pump or self-closing faucet only)
Do storage rooms meet fire resistive rating? ✓
If within 50' of another building or property line, a fire rating of at least 2hrs. required.)
Does the floor design create secondary containment? ✓
Is there enough aisle space for emergency response? ✓
Is equipment used to transfer class I liquids used to transfer class II or III? ✓
Is static protection used where transfers of flammable vapors may accumulate? ✓
Where fire is likely to occur is there a fire extinguisher within 75ft.? ✓

SUBPART H: HAZ. WASTE OPERATIONS AND EMERGENCY RESPONSE
1910.120
Has a written safety and health program been developed for hazardous waste operations employees? (initial is 24hrs; 8hr annual) 40 hr - ERT (35 members) CIHA
Are instructors qualified? Yes
Is the plan available ore review by employees, OSHA etc.? ✓
Does it include a training program? ✓
Does it include a medical surveillance program? ✓
Does it include a decontamination program? ✓
Doe it include emergency response procedures for first responders? ✓
Are personnel trained on emergency procedures, recognition, evacuation, first aid, ✓
Response, equipment, PPE, decontamination etc. ERTS

SUBPART I - PERSONAL PROTECTION EQUIPMENT
1910.133
SOP's determine the PPE assessments and requirement.
Has a written hazard assessment been done of the workplace? ✓
Does the facility provide training on PPE, its proper use and maintenance? ✓
Are training records on each employee maintained? ✓
Do affected employees wear adequate eye protection? ✓
If respirators are necessary:
Are employees given a medical evaluation and are they under a respiratory protection program? ✓
Are the programs written? ✓
Does it include fit testing, proper maintenance and training? ✓
Annual

Do affected employees wear hand protection? ✓
Are gloves chosen carefully based on hazard? ✓

SUBPART Z – TOXIC AND HAZARDOUS SUBSTANCES

1910.1001
Do employees manage friable asbestos? NO All been abated.
Are employees provided with respirators? N/A
Is there a medical surveillance program? N/A
Is training provided/documented? Awareness.

1910.1003
Do employees handle any of the 13 carcinogen listed in subpart Z?

Alpha-Napthylamine	2-Acetylaminofluorene
Methyl chloromethyl ether	4-Dimethylaminoazo-benzene
3,3- Dichlorobenzidine (and its salts)	N-Nitrosodimethylamine
bis-Chloromethyl ether	beta-Propiolacetone
beta-Napthylamine	Ethyleneamine
4-Aminodiphenyl	Benzidine
4-Nitrobiphenyl	vinyl chloride

PCB's

Are these stored in a special area with the required signs bearing "cancer suspect agent" ? YES
Do containers bear "cancer suspect agent" labels? YES
Are authorized personnel trained in hazards, medical surveillance, decontamination, and emergency procedures etc.? ✓
Is there a medical surveillance program? ✓
Is there a respiratory program? ✓
Does the employer provide change rooms in regulated areas? ✓

Does the employer provide initial, semi-annual or annual exams to employees exposed over the arsenic action level (5ug/m3) at least 30 days/yr.? ✓

Are blood samples taken to measure lead and is follow-up sampling done when it exceeds the numerical criterion? (above 40ug/100g) ✓

Are employees exposed to cadmium? NO
If employees are exposed above action level, are they under med. surveillance? ✓
Are urine and blood taken by a physician for testing? ✓

Where employees are exposed above the PEL, does the employer implement a written program to reduce the exposure below the PEL through engineering and work practice controls? N/A
IH Programm in place

Are respirators and a resp. program provided? ✓
Are appropriate PPE and med. surveillance available? ✓

Is a med. surveillance program available where employees are exposed above the action level for more than 30 days? ✓

Similar requirements hold for 1,2-dibromo-3-chloropropane, acrylonitrile, ethylene oxide, formaldehyde, methylenedianiline, 1,3-butadiene? ✓

Are employee records maintained for 30 years after employee leaves? ✓ yes Forever.

SUBPART J – GENERAL ENVIRONMENTAL CONTROLS

Permit requiring confined spaces

1910.146

Does the facility have confined spaces that are entered? ✓ Kilns and afterburners Tanks – clean outs. maintenance

Before entry, is an evaluation performed? ✓

Does the facility have a confined entry program? ✓

Does the facility have instruments to measure O2, LEL, and toxics? ✓

Does the permit require an entry attendant? ✓

Is documented training maintained on site? ✓

Lockout/tagout

1910.147

Does the facility have such a program and training? ✓

Does the facility provide protective materials and hardware? Tags,locks,chains, etc.) ✓

SUBPART O – MACHINERY AND MACHINE GUARDING

1910.211

Do machines that create rotating parts, flying chips or sparks have guarding? ✓ pumps/fans

Does the point of operation guards comply with specific design, contraction, application and adjustment requirements? ✓

Do employees receive instruction before operating a power press? ✓

Have point of operation injuries occurred? ✓

If so, were they reported to OSHA within 30 days of occurrence? yes

Are pulleys less than 7 feet high, guarded? Many All higher than 7ft

SUBPART Q – WELDING, CUTTING AND BRAZING

1910.252

Is welding or cutting done in the facility? yes

Is this activity done near materials that may cause a fire? yes

Are fire suppressants near by ? yes sometimes

permit required.

in process of VPP cert.

Incidents Koln 1998 – smoke/fire (inside)

1990 – confined space (Nitrogen – O2 displaced in tank.

– small fires (Lithium)

If a moderate to major fire may occur, is a fire watch required? yes 1991 - major fire (poll. control equip)

Does the firewatcher have an extinguisher available and is he/she trained to fight fires and sound the alarm? yes

Do welders use eye protection? (helmets, sheilds for arc welding) yes

Are arc welders protected from UV radiation? ✓

Do they wear appropriate protective clothing? ✓

If welders work in confined space is ventilation and lifeline provided? yes

Is respiratory protection provided to welders working in toxic atmosphere? – NO – prevent exposures

Are cylinders kept away from sources of heat? ✓

Are cylinders kept upright and secured? ✓

Are labels not easily removed? ✓

HEARING CONSERVATION PROGRAM

Does the facility have a HCP? (Y) N — Initial employee testing
When was the program implemented? It evaluated

Is there a Noise Control Coordinator? (Y) N

Does the facility contract out the noise survey (Y) & N — Have both contract and in-house.

If N are the instruments calibrated and certified for accuracy at least annually? (Y) N

Where in the facility are the noise levels at or above 85dBA (TWA)? yes. — Signage on areas requiring ear protection

Have employees been notified? (Y) N

Have engineered and administrative controls been implemented? (Y) N

Are employees provided with proper hearing protection? (Y) N

Are areas above 90bBA posted? (Y) N

Are employees formally trained on the effects of noise and protection? (Y) N

Is it done annually and documented? yes

Are employees formally trained on the effects of noise and protection? (Y) N

Is it done annually and documented? (Y) N

Are hearing tests part of employment period medical records? (Y) N

Are annual updates done if exposed to 85dBA or above? yes

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) ERTS #HM613201 PHX Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	AZD982465757	1	(800) [illegible]-6804	005719206 FLE

GENERATOR

5. Generator's Name and Mailing Address Attn: Frank Bonillas
City of Tucson & Pima Cty Household Waste
2440 W Sweetwater Dr
Tucson, AZ 85705
[illegible]-650-3749
Generator's Phone:

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name [illegible] Specialty Waste Solutions, Inc
U.S. EPA ID Number [illegible]

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address Clean Harbors Env Svcs - PHX
1340 W Lincoln St
Phoenix, AZ 85007
Facility's Phone: (602) 462-1700 Ext
U.S. EPA ID Number AZD049318009

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. [illegible], Aerosols, Poison, each not exceeding 1 L capacity), 2.2 (6.1), ERG-126 3X55 DM	3	DM	50#	P	
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information Generator is HHW per 40 CFR 261.4(b)(1)
[illegible]

D2S129734

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name	Signature	Month	Day	Year
Don Campbell	Don Campbell	3	27	13

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

	Printed/Typed Name	Signature	Month	Day	Year
Transporter 1	Keith Rodgers	[signature]	3	27	13
Transporter 2					

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H141			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name	Signature	Month	Day	Year
J [illegible]	[signature]	4	5	13

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

HOUSEHOLD HAZARDOUS WASTE PROGRAM
Tucson/Pima County

Household Hazardous Waste

2440 West Sweetwater Dr - Tucson, AZ 85705-6921

Drum Shipment Summary

Date: March 27, 2013

Shipper: Stericycle

Manifest #: 121309

	Drum #	Profile #	Description	Weight (lbs)	Type	Size (gal)	Total Weight
1	12-486	133792-11	Liquid Pesticides	483	DF	55	
2	13-019	133792-11	Liquid Pesticides	449	DF	55	
3	13-029	133792-11	Liquid Pesticides	533	DF	55	1,465
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							

Total Weight Page 1 (lbs): **1465**

Submit Work Area Emissions Inventory Records

Today's Date: 03/27/2012

RN Number:	RN102184173	Current Emissions Inventory Year:	2011
Account Number:	HG0633R	Last Emissions Inventory Year:	2010
Site Name:	CLEAN HARBORS DEER PARK LLC	Emissions Inventory Status:	EXTRACTED
Organization Name:	CLEAN HARBORS DEER PARK LLC		

Emissions Inventory Records 1 to 1184 (This will open a new window)

CRITERIA EMISSIONS TOTALS

Class	Name	Annual (TPY)	Ozone (PPD)	SMSS (TPY)	EE (TPY)
CO	CARBON MONOXIDE EMISSIONS	4.5509	24.2739	0.0000	0.0000
NOX	OXIDES OF NITROGEN EMISSIONS	27.4069	149.8618	0.0000	0.0000
VOC	VOLATILE ORGANIC COMPOUND EMISSIONS	7.0950	38.5464	0.0000	0.0000
SO2	SULFUR DIOXIDE EMISSIONS	0.7199	3.9314	0.0000	0.0000
PM10	PM10 EMISSIONS	17.5547	96.2043	0.0000	0.0000
PM2.5	PM2.5 EMISSIONS	0.8707	6.7788	0.0000	0.0000
PB	LEAD EMISSIONS	0.0952	0.5217	0.0000	0.0000

Criteria emissions totals based on data loaded into STEERS by an authorized STEERS user.

I certify that the information submitted is complete and accurate to the best of my knowledge. By entering my password and pressing the "Confirm Submit" button, I agree that:

1. I am Luis A Benavides, the owner of the STEERS account ER026902.
2. I have the authority to submit this data on behalf of RN102184173, CLEAN HARBORS DEER PARK LLC.
3. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
4. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
5. I am knowingly and intentionally submitting 1184 records. I have personally examined the foregoing and am familiar with its content and the content of any attachments.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I do hereby certify that information reported in this inventory is true, accurate, and fully represents the emissions that occurred during the Emissions Inventory Reporting Year to the best of my knowledge.

Password: Do Not Submit

You do not have Submit authority.

Submit Work Area Emissions Inventory Records

Today's Date: 03/29/2013

RN Number:	RN102184173	**Current Emissions Inventory Year:**	2012
Account Number:	HG0633R	**Last Emissions Inventory Year:**	2011
Site Name:	CLEAN HARBORS DEER PARK LLC	**Emissions Inventory Status:**	EXTRACTED
Organization Name:	CLEAN HARBORS DEER PARK LLC		

Emissions Inventory Records 1 to 1646 **(This will open a new window)**

CRITERIA EMISSIONS TOTALS

Class	Name	Annual (TPY)	Ozone (PPD)	SMSS (TPY)	EE (TPY)
CO	CARBON MONOXIDE EMISSIONS	4.8530	64.4900	0.0000	0.0000
NOX	OXIDES OF NITROGEN EMISSIONS	21.8700	290.7000	0.0000	0.0000
VOC	VOLATILE ORGANIC COMPOUND EMISSIONS	6.8087	67.5560	0.0000	0.0000
SO2	SULFUR DIOXIDE EMISSIONS	0.7630	10.1100	0.0000	0.0000
PM10	PM10 EMISSIONS	18.0920	201.2515	0.0000	0.0000
PM2.5	PM2.5 EMISSIONS	13.4197	176.0918	0.0000	0.0000
PB	LEAD EMISSIONS	0.1000	1.3410	0.0000	0.0000

Criteria emissions totals based on data loaded into STEERS by an authorized STEERS user.

I certify that the information submitted is complete and accurate to the best of my knowledge. By entering my password and pressing the "Confirm Submit" button, I agree that:

1. **I am Luis A Benavides, the owner of the STEERS account ER026902.**
2. **I have the authority to submit this data on behalf of RN102184173, CLEAN HARBORS DEER PARK LLC.**
3. **I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.**
4. **I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.**
5. **I am knowingly and intentionally submitting 1646 records. I have personally examined the foregoing and am familiar with its content and the content of any attachments.**
6. **I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a federal environmental program and must be true and complete to the best of my knowledge.**
7. **I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.**
8. **Pursuant to Texas Health and Safety Code 382.0215(f), I do hereby certify that "No Emissions Events" were experienced at RN102184173 during the Emissions Inventory Reporting Year.**
9. **I do hereby certify that information reported in this inventory is true, accurate, and fully represents the emissions that occurred during the Emissions Inventory Reporting Year to the best of my knowledge.**

Password:

Do Not Submit

You do not have Submit authority.

Facility Audit Package

Clean Harbors Deer Park, LLC
2027 Independence Parkway South
La Porte, Texas 77571
281-930-2300

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I. INTRODUCTION

Since its inception in 1980, Clean Harbors Environmental Services, Inc. (CHES) has grown to become the leading environmental service provider and the largest hazardous waste disposal company in North America. CHES, the parent company of Clean Harbors Deer Park (CHDP), maintains a vast network of service centers and waste management, treatment, and disposal facilities. The company operates six incineration facilities, nine commercial landfills, six wastewater treatment operations, twenty TSDFs, six PCB management facilities, and two oil/used oil products recycling facilities; properties are located in 36 states, six Canadian provinces, Puerto Rico, and Mexico. CHES is North America's leading provider of secure, cost effective services that reduce the risk to customers and preserve and protect Earth's natural resources.

The site was established in 1971 and Clean Harbors acquired this facility from Safety-Kleen in 2002. This facility delivers state-of-the-future technological solutions for companies seeking the safe, responsible incineration of hazardous waste and industrial waste. The personnel at CHDP are committed to meeting all of your waste disposal needs.

History of Clean Harbors Deer Park, LLC

Year	Event
1969	Rollins Environmental Services purchased non-industrial Gulf Coast land
1971	Installation of 2.8 meter (diameter) rotary kiln
1974	Landfill operation (South)
1980	Installation of FOB Shredder System
1981	Received TSCA Letter of Authorization (First in USA)
1985	Installation of 3.6 meter slagging rotary kiln (replacing2.S m kiln)
1988	Received RORA Part Permit (First in USA)
1988	Installation of 4.4 meter slagging rotary kiln
1989	Installation of Rotary Reactor (bulk solid burner)
1989	Installation of shredder on front wall of 4.4 meter kiln
1990	MTR landfill operation (North)
1991	Installed glove boxes for cylinder gas disposal/drum liquid aspiration
1993	Stabilization & Encapsulation Facility on-line
1994	MTR landfill permitted (East)
1994	Industry of the Year - Deer Park Chamber of Commerce
1995	Awarded E.I. Digest for no Notice of Violations for the year
1996	Closure of South Landfill certified by TCEQ
1997	Acquired by Laidlaw Environmental Services, Inc.
1998	Merger with Safety-Kleen
2002	Acquired by Clean Harbors
2004	Installed Wet Electrostatic Precipitator Systems for MACT Compliance
2005	Development of the Comprehensive Performance Test (CPT)
2006	CPT was performed and submitted for Train I
2007	TCEQ request to lower the pressure drop & water flow rates for Train I USEPA request to lower the PCB operating temperature for Train I East Landfill permit issued in June
2008	TCEQ/USEPA issued a MACT Finding of Compliance for Train I East Landfill Cell 1 Operation began in February Dioxin/Furan testing performed on Train II Class 3 Permit Modification to lower RCRA operating conditions onTrains I and II

2009	TCEQ/USEPA issued a MACT Finding of Compliance for Train II Construction of East Landfill Cell 2 was certified by TCEQ
2010	Final closure of the North Landfill was completed
2011	CPT was performed and submitted for Trains I and II

Visiting the Deer Park Facility

Anyone wishing to audit/tour the Deer Park facility should arrange the visit with their appropriate Account Manager (AM) or Customer Service Representative (CSR) and have him or her schedule the appropriate arrangements. In order to ensure that the appropriate personnel and resources are available, please arrange the visit as far in advance as possible.

The Deer Park facility is a large industrial complex which requires appropriate attire for entry:

1) Long pants (no shorts or dresses)
2) Closed-toe shoes (steel-toe shoes not required)
3) Hard hats and safety glasses will be provided

All photos must be reviewed by Clean Harbors personnel.

If you require further information, please call the Environmental Compliance Department at 281-930-2300.

Directions to the facility from Houston Hobby Airport

Take I-45 North to Loop 610

Take Loop 610 East to Hwy 225 East (Pasadena/La Porte Hwy) – (Approximately 1-1.5 miles from I-45/Loop 610 Intersection)

Take Hwy 225 East approximately 9-10 miles (past Shell refinery/chemical complex)

Exit Independence Parkway South (Battleground Road) cross over Hwy 225 (left), traveling North on Independence Parkway South (Battleground Road)

Travel approximately 1-1.5 miles north.
Note: You will pass the Clean Harbors Ten Day Facility on your right (east side). Then you will also pass the Clean Harbors Purchasing Building on your left (west side).These two are not the Deer Park facility entrance; continue traveling north.

Facility entrance is located on the left (west side) situated between tank batteries of Intercontinental Terminals (ITC)

Turn left at Facility sign "Clean Harbors"

Proceed through ITC gate, turn left at visitors sign, prior to the railroad tracks and check in with the compliance guards in the visitors building. Once Health and Safety procedures are completed, the compliance guard will provide you with a visitors badge and will call the person you are scheduled to meet with.

Directions to the facility from George Bush Intercontinental Airport

Exit Airport to Hwy 59, and take Hwy 59 South to Beltway (Sam Houston Tollway)

Take Beltway East (approximately 15-19 miles)

Continue on Beltway 8 over the Houston Ship Channel Bridge (toll fee $2.00) and continue to Hwy 225.

Take Hwy 225 East approximately 9-10 miles (past Shell refinery/chemical complex)

Exit Independence Parkway South (Battleground Road) cross over Hwy 225 (left), traveling North on Independence Parkway South (Battleground Road)

Travel approximately 1-1.5 miles north.
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II. GENERAL INFORMATION

Parent Company – Clean Harbors Environmental Services, INC.

Clean Harbors Environmental Services. Inc.
42 Longwater Drive
P.O. Box 9149
Norwell, MA 02061-9149
781.792.5000
800.282.0058
Alan S. McKim, Chairman and Chief Executive Officer
Date Founded: 1980

Company Ownership Structure

Clean Harbors Environmental Services, Inc.
New York Stock Exchange: CLH

Corporation Standard Industrial Classification (SIC) Code with Description

4953 - Refuse Systems

North American Industry Classification System (NAICS) with Description

562211 – Hazardous Waste Treatment and Disposal

Dun & Bradstreet DUNS Number

Clean Environmental Services, Inc.: 157793539

Clean Harbors Deer Park, LLC

Clean Harbors Deer Park. LLC
2027 Independence Parkway South
La Porte, TX 77571
281.930.2300
USEPA I.D. Number: TXD055141378
State I.D. Number: 50089
Facility Midpoint: Latitude - 29° 43' 35" Longitude - 96° 05' 40"
General Manager – James East

Size

The total space is 145 acres. 136 acres are in active use. 51 acres are for plant operations and 85 acres are for the south, north, and east landfills. 9 acres are not in active use which includes unused land, undeveloped land, and buffer areas from neighboring facilities.

Site Access/Security

The facility is under a 24-hour surveillance system. Visitors are required to sign in to the receiving area, view a Safety Orientation Video, and are issued a visitor badge. The facility perimeter is totally fenced (hurricane fencing with three strand barbed wire) and posted with the appropriate notices around the perimeter.

Hours of Operation

24 hours/day; 7 days/week; 52 weeks/year

Number of Employees

Approximately 275

Liability, Closure and Post Closure Financial Documentation

See ATTACHMENT 1.

Principal Facility Contacts and Telephone Numbers

Senior Environmental Compliance Manager

281-930-2482

Environmental Compliance Specialist

281-930-2439

Insurance

Insurance Certificate(s) can be provided via our corporate offices specific to each generator/customer. The insurance carriers and coverage levels are current as of this writing and are subject to periodic review and modification, as warranted. Please contact your Account Specialist to request an insurance certificate. NOTE - you must have a valid contract with CH to obtain an insurance certificate in your name. See ATTACHMENT 1 for the Certificate of Insurance.

Adjacent Property Use

CH Deer Park is located in a heavily industrialized sector; adjacent land owners are petrochemical industries with further outlying areas also industrialized. There is no immediate Agricultural Land use. See ATTACHMENT 2 for a key and the map of the Adjacent Land Owners.

Water Sources

CH Deer Park Industrial Process Water is supplied by the City of Houston, Coastal Industrial Water Authority, (CIWA) via canal and pipeline from the Trinity River.

CH Deer Park Potable Water - private, permitted well screened in the Lower Chicot Aquifer located between 450 to *500* feet below grade, and is used only for shower/restroom water. This water is treated through filtration and chlorination. Drinking water is supplied through bottled water via an outside vendor.

City of Deer Park Residents - The Evangeline Aquifer is the closest drinking water supply located 2.5 miles directly south of the facility 620 to 1500+ feet below the surface.

Closest Sensitive Receptor

Park – San Jacinto State Park located one mile north of the facility

Residential area – one mile (approximate population is 30) three miles (approximate population is 50,000 for deer park)

Bayshore Hospital – 12 miles

Elementary school – two and half miles

Nearest Surface Water Resource and Use

Tucker's Bayou runs adjacent to CH Deer Park on the west end of the property fence line and is the industrial discharge point (TPDES) for the facility's treated wastewater. Tucker's Bayou empties into the Houston Ship Channel approximately one-mile

northwest of the facility. Tucker Bayou and the Houston Ship Channel are not used as sources for public water supply or for any recreational purposes.

Flooding

The site operates and maintains the facility to prevent washout of any hazardous waste by a 100-year flood. *40 CFR 264.18(b) (1).*

Regulatory and Compliance

Permit Type/Governing Agency	*Permit No.*	*Expiration Date*
RCRA Part B TCEQ - Austin	50089	01/18/2015
NSR Air Permit TCEQ – Austin	5064-N001	04/06/2021
Title V Air Permit TCEQ – Austin	O-1566	10/25/2012 (New Title V permit application submitted April 2012)
TPDES Permit[1] TCEQ – Austin	01429	10/12/2010
TSCA Authorization[2] EPA – Region VI (Dallas)	N/A	08/05/2002

[1]*USEPA-Region VI has transferred the NPDES permit rights to TCEQ for consolidation into the renewed TPDES Permit No. 1429. Renewal submitted and EPA and TCEQ are in the review process.*

[2]*Current TSCA Authorization remains in force awaiting approval of renewal application.*

See ATTACHMENT 3 for the cover pages of the currently issued permits.

Regulatory Authority in the State of Texas

The Texas Commission on Environmental Quality (TCEQ) is authorized to administer RCRA, CAA, and CWA regulations within the state. USEPA - Region VI administers TSCA regulations and the MACT regulation from the CAA.

Permit & Governing Agency	*Contact Person*	*Contact Information*
RCRA Part B Permit TCEQ - Austin	Mr. Vahab Haghighatian	512.239.6081
NSR Air Permit TCEQ – Austin	Mr. Tony Ionescu	512.239.1277
Title V Air Permit TCEQ – Austin	Mr. Jesse Chacon	512.239.1570
TPDES Permit	Mr. Yvonna Miramontes	512.239.4515

TCEQ – Austin		
TSCA Authorization and MACT Standards EPA – Region VI (Dallas)	Mr. Jim Sales	214.665.6796

Regulatory Agency Inspection Schedule

The TCEQ typically performs two major RCRA inspections of the facility per year. The first inspection normally occurs in the first quarter of the year and concentrates on all aspects of the RCRA permit. The second inspection usually occurs in the third quarter of the year and concentrates on groundwater monitoring. On an average, the facility is inspected approximately 6 times per year by regulatory agencies and 75-l00 times per year by customers/generators.

- RCRA (TCEQ) - 2 times/year
- TSCA (USEPA) – every 2 years
- Air (TCEQ) – minimum of once/year
- Wastewater (TCEQ) - varies
- TPDES (TCEQ/USEPA) - varies
- Wastewater (Harris County Pollution Control Department) unannounced; generally interested in water quality parameters under the TCEQ rules and permit limits.

Third Party Liability Suits Pending Against the Site

None

III. PLANT OPERATIONS

Incineration

CHDP utilizes state-of-the-art thermal treatment (incineration) technologies along with air pollution control technology to treat liquid, solid and gaseous hazardous wastes. Wastes are incinerated in an oxidizing atmosphere at temperatures high enough to achieve required destruction. The incineration system consists of two incineration train units. Train I has a permitted thermal capacity of 180 MM BTU/hr and includes a 3.6 meter diameter slagging rotary kiln, a horizontal after burner, and a Loddby liquids burner. Train II has a permitted thermal capacity of 213.5 MM BTU/hr and includes a 4.4 meter diameter slagging rotary kiln, the Rotary Reactor (RR), and a vertical afterburner. Each train is equipped with an air pollution control system which incorporates a Lurgi Venturi saturator, dual packed tower condensers, a Calvert collision scrubber, a mist eliminator, a wet electrostatic precipitator (WESP), and a selective catalytic reduction (SCR) system for removal of NOx emissions.

Sub-micron particulates, including heavy metals, are removed from the gas stream in each WESP by imparting a positive charge on the particles in an electric field, and then collecting the positively charged particulate on a grounded (negatively-charged) collection surface. The water is discharged from the WESP vessels in a blow-down tank and recycled or discharged to the wastewater treatment plant.

Two 1,350 horsepower variable frequency drive induced draft fans are also part of the incineration system. They accommodate the system static pressure introduced by the gas cleaning equipment (two WESP vessels in series and on SCR system per train) and

ductwork. Fan inlet dampers are provided, in addition to the fan, to accommodate the wide-ranging flow and pressure conditions.

The SCR equipment is installed downstream of the fans on each gas cleaning train and operated under positive pressure. The SCR system requires heating the flue gas to the 525 - 600°F range, and then injecting ammonia (NH3) as ammonium hydroxide (NH4OH; aqueous ammonia). The NH3 flue gas is then thoroughly mixed via a static mixer prior to it passing through a catalyst bed, where NOx is converted into nitrogen and water vapor.

Two separate individual stacks are downstream of the SCR equipment for discharging the clean flue gas to atmosphere.

Permitted Operational Limits

	TRAIN I		**TRAIN II**		
	3.6 Kiln	**Afterburner I**	**4.4 Kiln**	**Rotary Reactor**	**Afterburner II**
Maximum Waste Feed Rates (lbs/hr)	20,909	16,848	17,807	14,508	12,681
Maximum Temperature (°F)	NA*	NA*	2,374	1,580	2,240
Minimum Temp (°F)	1,661	1,846	1,627	914	1,785
Maximum Air Flow Rate (DSCFM)	N.A.	48,892	N.A.	N.A.	49,132
Maximum Combustion Zone Pressure	Negative relative to seal pressure	Negative relative to seal pressure	Negative relative to seal pressure	Negative relative to seal pressure	Negative relative to seal pressure
Maximum THC Concentration (ppm)	N.A.	10*	N.A.	N.A.	10*

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Process Flow Diagrams & Facility Plot Plan

ATTACHMENT 4

Incinerator Ash Tracking Prior to Landfill Deposition

Each collection bin is numbered and referenced. During the incineration process and the filling of a specific bin, waste stream numbers are tracked via barcode readings and manual entries. The ash generated is tracked. From this process, EPA waste codes can be managed from a point of analytical testing. Organic screening and TCLP metals are performed on residuals according to the protocol outlined in the waste acceptance plan.

Landfill Operations (Non-Commercial)

The CHDP landfills are permitted to dispose of onsite generated residuals. There are three onsite landfills: the North Landfill (closed), East Landfill (active), and the South Landfill (closed). Material must meet all applicable land disposal restrictions and CHDP permit requirements prior to placement in our on-site landfills.

The CHDP Stabilization and Encapsulation (S&E) Facility is a state-of-the-art facility. If necessary residual wastes streams generated in the incinerators are treated onsite to meet land disposal restrictions prior to land disposal. The facility is entirely enclosed in a building with dedicated bag houses to control particulate emissions and prevent storm water run-on. The entire facility has a welded HDPE underliner and leak detection system.

S&E Facility Operations

Materials required to be processed in the S&E Facility are placed into one of two receiving pits located inside the building. A track hoe positioned between the receiving pits transfers the material onto a vibrating grizzly which directs material to a shredder. A computer selects the appropriate recipe for the mix additives based on treatment standards required for the specific waste batch being processed. Additive mixtures are computer controlled, weighed, fed to the belt conveyor and moved with the waste to a pugmill for mixing. The pugmill has a capacity of 22 cubic yards and provides a minimum of 30 seconds of retention time with vigorous mixing by two chain-driven shafts.

Materials that are discharged from the pugmill are fed into a reversible shuttle conveyor which in turn unloads the waste product into the processed waste storage loading area pits. The waste is sampled and picked up by a front-end loader then placed into a bin located in the building loading area. A bin truck then transports the bins to a storage area. Bins of stabilized material are held in the 90-day storage area until TCLP results allow the treated waste to be placed in our on-site landfill.

Placement of Material in the Landfill

Material must meet all applicable land disposal restrictions and CHDP permit requirements, prior to placement in our on-site landfill. When material is placed in our on-site landfill it is leveled and compacted by a bulldozer or compactor. Documentation provides a record for each bins deposition and location in the landfill. A 3-dimensional XYZ grid system is used to place and locate material in the landfill. Lift thicknesses are generally twelve inches or less.

	East Landfill	North Landfill	South Landfill
Rated Capacity	658,000 cubic yards	815,000 cubic yards	1,500,000
Materials Deposited	Ash, filter cake, RCRA empty drums	Ash, filter cake, RCRA empty drums	Ash, filter cake, haz/non-haz waste
Landfill Status	Active non-commercial use	Closed	Closed

S&E Facility Washwater and Dust Collection

Washdown water resulting from regular building housekeeping activities is collected in sumps and is pumped to a process water tank where it can be used in future S&E batches. Air within the building is scrubbed through baghouse filters located on the roof. These baghouse filters are interval pulsating which knocks down particulate build-up and returns the particulate to the pugmill. A built-in interlock system allows the facility to operate only if the blowers are operating.

Water Treatment Operations (Non-Commercial)

Water utilized in the gas quenching operation is treated on-site in the water treatment plant prior to reuse in quench operations. Quench water is pumped to a primary neutralization tank for partial neutralization with a lime slurry. Final pH adjustment is accomplished in a secondary neutralization tank with caustic. The quench water then flows into two (2) clarifiers where metal hydroxides settle out as sludge. Treated water flows from the clarifiers to the cooling towers to be cooled and then recycled back to the gas quenching system for reuse in incineration process. A total of 20 million gallons per day are treated and a total of 1.5 million gallons per day are discharged.

All process water is eventually discharged (through TPDES permitted outfall) to Tuckers Bayou, which flows adjacent (northwest flow) to the facility and empties into the Houston Ship Channel. This water is treated through pH adjustment, metal hydroxide precipitation, and the addition of a flocculent/coagulant to enhance metal precipitation through lamella separators. This water is then polished (pH adjustment if required) and piped to the check tank. Upon receipt of lab analysis showing that water meets TPDES Wastewater Permit analysis parameters, the water is discharged into Tucker's Bayou.

Facility Outfalls

OUTFALL	TPDES
001	Process Water (Closed)
004	Process Water
002	Storm Water[1] (non-contact)
003	Storm Water[1] (non-contact)
101	Internal[2]
201	Internal[2]

[1] - Storm water; for undeveloped areas, non-active areas, and capped landfills.
[2] - Internal; outfall is regulated by TCEQ and serves as a point to sample/monitor water from organics unit (PACT - powder activated carbon treatment) prior to mixing in Outfall 001 check tanks. Should the sample result exceed the internal limits, this water can be re-circulated back to the water treatment facility, thereby preventing mixing of the check tanks.

Process Water Residuals (Filter Cake)

The resultant sludge generated from the flocculation and precipitation of metal hydroxides is pumped to a set of horizontal filter presses. Most of the remaining water is separated from the sludge producing a filter cake. This filter cake is stabilized and tested for all LDR treatment standards and placed in the on-site landfill.

Storm Water Management

Storm water is collected, inspected for potential contamination, and either transferred to one of three storm water storage tanks or incinerated. Under routine operations, this stormwater is treated in the water treatment facility using a PACT (activated carbon) system to remove any trace organics that may be present. The treated water is then discharged via our permitted TPDES Outfall 004. In the event of a large rainfall, the site may declare an emergency and discharge the stormwater directly through the permitted TPDES Outfall 002. The site follows a Stormwater Management Plan.

Leachate Management

All leachate collected from the on-site landfills is treated using a PACT (activated carbon) system. This includes groundwater collected per the Compliance Plan that addresses on-site groundwater contamination. The treated water is discharged via our permitted TPDES Outfall 004.

Commercial Availability

The water treatment facility is used solely for the treatment of onsite generated water. Commercial wastewaters are received and managed as a thermal oxidation stream (TOX) utilizing incineration technology.

Tanks and Piping

CHDP conducts a strict program of fugitive emissions monitoring and repair, consistent with TCEQ 28 MID, which is equivalent with MACT standards (i.e. quarterly monitoring, 200 ppm leak rate, directed maintenance, etc.). ATTACHMENT 5 - Tank Specifications

Container Storage Areas and Miscellaneous Units

CHDP receives waste daily all year round, but volumes can fluctuate from day-to-day and month-to-month. Approximately 152,000 tons are received annually by CHDP. The container storage areas are segregated so incompatible wastes can not be easily co-mingled. The following table provides the total storage capacity for drum and bulk containers:

Container Type	Capacity
RCRA drums	1,291,000 gallons
PCB drums	376,500 gallons
Tankers/Railcars	289,500 gallons
Bins	1,575,397 gallons
Tanks*	855,500 gallons

*CHDP does not have any under ground storage tanks.

See ATTACHMENT 5 - Container Storage Areas and Miscellaneous Units.

Training

Training at CHDP begins with an analysis of each job position. From this analysis, job descriptions and Standard Work Practices (SWPs) are developed. The content of all SWPs is validated through an employee participation process before any training commences and before the SWPs are finalized. Job-specific training is provided to employees whenever they are initially hired, change positions, and for recertification purposes (on a tri-annual basis).

Standard Work Practices provide the primary foundation for each job-specific training program. Additionally, CHDP has a process to modify SWPs when procedural/equipment changes occur and for annual SWP reviews.

Training records are stored and maintained on a relational database called TRIM® (Training Records Information Management). The database uses tables for entering employee, job, course, and instructor information. These tables are linked by identification codes. The entered data allows four (4) functions to be conducted:

- Records management, the recording and maintenance of employee job and training history;
- Curriculum development, the creation, management and application of job-specific training requirements;
- Class scheduling, the application of job training requirements and employee training history to schedule needed training;
- Report writing, querying and printing of training records and other training information in an organized format.

Typical reports that can be generated (although not limited to) are:

- Training delivered (by employee, by job, by course, or by instructor)
- Job and training history
- Training requirements (by employee or for the job)
- Class sign-up/Grading Sheets

The database is maintained on the facility network. This will allow the department managers and supervisors to view the training status of a particular employee or group of employees.

IV. TECHNICAL SERVICES

WASTE ACCEPTANCE

Pre-shipment

Waste acceptance at Clean Harbors Deer Park, LLC follows procedures set forth in the site's Waste Analysis Plan (WAP). The WAP is incorporated into the facility's RCRA Part B Permit. Prior to waste acceptance for shipment, profile, and analytical data of the waste, the waste is reviewed for regulatory compliance, health and safety, and the facility's handling capabilities. ATTACHMENT 6 - CHDP Acceptable/Unacceptable Waste Codes

Waste Shipment Receiving

All incoming wastes are subject to a compliance and conforming load review and verification prior to acceptance/discharge to the plant. The compliance phase of waste acceptance begins with a paperwork review of shipping documents for completeness and correctness. This targets the manifest, Land Disposal Restriction (LDR) Certification, and re-verification of EPA waste codes and associated paperwork. The next step of waste acceptance is the conforming load review. This entails radiological screening, sampling, container count verification, and fingerprint analysis.

The objective of this procedure is to ensure that the load is conforming to the waste stream profile and that it can be processed safely and in compliance with current federal, state, and facility permit requirements. After both issues (compliance/conformance) have been addressed and the waste stream approved for acceptance/process, the discharge is made. This entails generating waste discharge documentation accompanied by a Waste Safety Sheet (WSS), along with individual barcode labels (with unique serial numbers) for tracking and disposal planning.

Analytical Laboratory

The Laboratory is staffed and equipped to serve the needs of both the customer and the site. With the Technical Services Manager, QA/QC Specialist, Laboratory Supervisors and highly trained Chemists and Technicians, technical competence exists in the areas of physical and chemical characteristics, metals, wastewater, and organics analyses.

The Receiving Laboratory processes incoming load paperwork, samples bulk tankers and bins, and performs a variety of physical and chemical characteristic analyses on incoming waste streams. Analyses such as heat of combustion, scrub, halogens, ph, and % ash are just a few of the analytical parameters performed in this area. This laboratory also discharges all incoming loads to plant operations.

The Metals Laboratory performs analyses on incoming waste streams and wastewater generated on site using modern technology such as Inductively Coupled Plasma (ICP) and atomic absorption spectrophotometry. This laboratory also performs Toxicity

Characteristic Leaching Procedures (TCLP) on site-generated wastes, such as incineration residues placed in the site MTR landfill.

The Wastewater Laboratory performs analyses required by the USEPA, TPDES, and TCEQ permits such as oil and grease, ph, TSS, BOD and TOC. This laboratory also provides on-site analytical support for monitoring wastewater treatment processes.

The Environmental Laboratory routinely performs volatile and semi-volatile organics screening by GC/MSD and PCB analysis. Examples of samples analyzed include incoming wastes, incineration residues, and wastewater.

A laboratory Quality Assurance Program was established to ensure that each facility laboratory provides quality analytical data in agreement with the site's Waste Analysis Plan and the analytical methods referenced, defensibility of analytical results through the assessment of quality control data, and intercompany consistency through standardized procedures and training. The fundamental elements of the program include:

- Standardized documentation
- Standardized QA/QC and Analytical Procedures
- Performance Evaluation Samples
- Staff Training
- Laboratory Audits

Standardized Documentation

Standardized documentation is necessary if the goal of consistent laboratory procedures within the corporation is to be realized. Such documentation includes the following:

- Standard operating procedures for sampling
- Standard operating procedures for analytical methods
- Quality assurance/control procedures
- Data management and reporting procedures

Standardized QA/QC and Analytical Procedures

The bases for most of the analytical procedures used are EPA SW-846, Standard Methods for Wastewater Analysis, and ASTM methods. Calibration frequency, duplicate and spike frequency, data reduction and review, and etc are defined in the referenced methods and CH enforced through corporate procedures. Quality control techniques are employed to ensure that measurement processes are maintained within acceptable levels of accuracy and reproducibility.

Performance Evaluation Samples

The use of performance evaluation samples employed in "round robin" evaluations contribute to the objective assessment of a laboratory's analytical abilities. CHDP labs are engaged in EPA performance evaluation programs for DMR (Discharge Monitoring Reporting).

A quarterly "round robin" performance evaluation program which addresses commonly analyzed parameters and is administered by the CH corporate designated laboratory to further supplement the program.

External laboratories which provide analytical services to CH facilities must be able to demonstrate acceptable performance on EPA administered performance evaluations and/or those from state certification programs, when appropriate upon request. They may be required to participate in the CH audit program.

Participation will depend upon the scope of services provided. Acceptable performance on these evaluations is an important aspect of a laboratory's ability to defend the data which it generates.

Staff Training

CHDP trains stair both in procedural technique arid in understanding the basic needs and reasons for a quality program used for samples of incoming waste loads and plant generated wastes. Training is provided by qualified facility staff, CH personnel, or an instrument manufacture's representative. The training location may be on-site or at a manufacturer's location.

Laboratory Audits

The CHDP laboratories follow a laboratory quality assurance program administrated by the lab QA/QC Specialist. The lab QA/QC Specialist ensures that every area of laboratory operation remains in compliance with both federal and state guidelines for performing analyses.

CHDP facility laboratory audits utilize an audit checklist for on-site evaluations to promote consistency and structure. However, the audit extends beyond an operational checklist and includes the evaluation of all the elements in the Quality Assurance Program. In addition to routine audits conducted at the facility, an annual audit is conducted at each CH facility. Summary reports are provided to the audited facility and CH corporate.

Any external laboratory performing services for CH is audited by the facility for which the analytical services are rendered. These audits are accomplished through review of quality assurance documentation supplied by the external laboratory, historical performance evaluation results, and a site visit.

Geology and Groundwater

Geology

The Deer Park facility is located in the Gulf Coast Physiographic Province. This province is characterized as a flat, featureless plain, which extends inland 40 to 60 miles and generally parallels the present coastal shoreline. The region is characterized by sediments deposited by fluvial and near shore marine processes.

These natural processes are the same processes that are active in shaping the present shoreline. Formations in this region are part of the Cenozoic System, a deep sedimentary basin, which extends into the Gulf of Mexico.

The system encompasses sediment 6,000 to 7,000 feet in thickness, with the formations ranging from Eocene to Pleistocene in age. These formations dip generally toward the Gulf of Mexico at a rate of 20 to 30 feet/mile, increasing in thickness downdip. (see Figure 1)

Figure 1. STRATIGRAPHIC SECTION OF THE DEER PARK, TEXAS AREA

SYSTEM	SERIES	FORMATION		AQUIFER	
Quaternary	Holocene	Alluvium &		Chicot	Upper
	Pleistocene	Beaumont			Lower
		Lissie	Montgomery	Evangeline	
		Willis		Burkeville	
		Goliad		Jasper	
Tertiary	Pliocene	Fleming			
	Miocene				

Review of lithologic/textural descriptions from exploratory borings, monitoring well installation logs, and other such information indicates that the subsurface at the facility consists of sediments of the regional Beaumont Formation, with the surface soils consisting of mainly the Beaumont Clay. These sediments are generally highly-plastic clays, separated by interbedded, lenticular deposits of sandy clay, clayey silt, and silty sand. The silt and sand sediments represent periods of fluvial activity, whereas the clays are mainly of marginal-marine origin.

Based on differences in physical properties, the upper 140 to 150 feet of the subsurface can be divided into six distinct units. These units are referred to as Strata 1, 2, 3, 4, 5, and 6, in order of decreasing depth. Figure 2 on the next page provides general unit descriptions of these six strata.

Figure 2. STRATIAGRAPHY AND UNIT DESCRIPTIONS

UNIT	DESCRIPTION
STRATUM 1	GRAY AND TAN SILTY AND SANDY CLAY AND CLAY; interbedded lenticular deposits of clayey silt, sandy silt and clayey sand throughout; general downward coarsening; clays are firm to stiff; unit thickness is approximately 20 feet.
STRATUM 2	LIGHT GRAY AND RED MOTTLED CLAY; very stiff to hard; highly plastic; locally silty and sandy; few discontinuous sandy and clayey silt lenses in some areas; unit thickness is approximately 25 feet.
STRATUM 3	INTERBEDDED LENTICULAR DEPOSITS OF GRAY AND TAN CLAY, CLAYEY SILT, SILTY SAND, AND CLAYEY SAND; few thin seams of fine sand; unit thickness ranges 18 - 28 feet, averaging 22 feet.
STRATUM 4	RED AND LIGHT GRAY CLAY AND SANDY CLAY; interbedded lenticular deposits of clayey and silty sand and silt; lenses increase in occurrence toward base of unit; general downward coarsening; clays and sandy clays are still to hard; unit thickness is approximately 20 feet.
STRATUM 5	TAN SILTY SAND AND FINE SAND; interbedded lenticular sandy clay deposits; unit thickness is often greater than 50 feet.
STRATUM 6	GRAY AND BLACK CLAY; soft to very stiff; locally silty and sandy, Stratum 5/6 contact averages 117 feet below surface elevation.

Groundwater

Groundwater quality assessment activities were initiated in 1985, when chemical analyses of groundwater samples indicated contamination. Since then, extensive groundwater quality assessment studies and a RCRA Facility Investigation (RFI) have delineated the site's hydrogeology and groundwater make-up.

Regional geological studies indicate that the Chicot and Evangeline aquifers are regional sources for drinking water and industrial process water. These two aquifers are located at 300 to 500 and 620 to 1500+ feet below the surface. The facility has two industrial wells completed in the lower Chicot aquifer, and groundwater withdrawal is controlled by the Harris-Galveston County Coastal Subsidence District. Analytical results indicate no detectable contamination in these wells. The amount of groundwater pumped from these aquifers has no discernible hydraulic influence on shallow groundwater at the facility. Thick clay layers separate the deep drinking water from the monitored shallow sands.

Past activities at the Deer Park facility resulted in groundwater contamination in three subsurface layers (Strata 1, 3, and 5). The contaminants of concern are chlorobenzene and a number of volatile organics. As a result of this contamination, in October 1987, the Deer Park facility entered into an Administrative Agreed Order with the USEPA under

3008(h) of RCRA to perform corrective actions to close wastewater lagoons and an area of buried drums between the North and South Landfills, referred to as the Drum Remediation Area. The Corrective Action Plan called for implementation of Interim Corrective Measures; completion of a RCRA Facility Investigation (RFI); and a Corrective Measures Study. In 1988, when the TCEQ granted a Part B permit, the state stipulated that the site conduct an RFI. The regulators agreed that one RFI could be conducted to meet both federal and state requirements. The RFI Final Report was approved in June 1992.

Through implementation of the Interim Corrective Measures, Deer Park has undertaken numerous activities to remove and/or control the major sources of contamination at the site. All of the surface impoundments have been taken out of service, replaced with aboveground tanks, and closed. Most of these closures entailed excavation of contaminated materials from the impoundments and excavation of the adjacent and underlying soils to the first zone (Stratum 1). The closures also included the installation of groundwater control measures (French drains) in some units where residual contamination was found in the soils at the lowest point of excavation. Approximately 12-14 million pounds of waste and contaminated soils were excavated from the old Drum Remediation Area and incinerated. In addition to these source removal measures, a groundwater recovery system has been installed. Subsequently, pursuant to issuance of a Compliance Plan (No. CP-50089-001) by the TCEQ in 1988, these actions were labeled the Phase I Corrective Action.

Several areas, including former landfill cells and several former lagoons, may receive corrective action in the future. The Corrective Measures Study Report (March 1995), which has been approved by the EPA, proposed Phase II contaminant control and remediation activities, including construction of slurry walls and impermeable caps along with in-situ vapor extraction of source material.

In October 1995, upon review of the Phase II Corrective Action Plan (September 1995), which summarizes the results of the Phase I Corrective Action, the TCEQ agreed that (1) the Deer Park facility had demonstrated the effectiveness of the Phase I Corrective Action in controlling groundwater contamination and (2) the actions proposed in the Corrective Measures Study (referred to as the Phase II Corrective Action Plan) were not requested at the time.

The facility received the third renewal and update of its Compliance Plan in January 2005. The Plan requirements resulted in several projects. Contamination along the northwest property boundary was investigated with samples taken on neighboring property, with no contamination detected. A computer modeling exercise for remediation system efficiency resulted in recovery (remediation) wells along the northwest property boundary being shut-off and new recovery wells placed in the interior of the facility process area. The remediation pumping system draws polluted groundwater towards the interior of the facility and prevents contamination from migrating off-site.

The facility continues its groundwater monitoring program with a semi-annual sampling program conducted the second and fourth calendar quarters. The groundwater remediation system (pump-and-treat) operates continuously with contaminated water treated in the on-site wastewater treatment system. Reports are filed with the TCEQ semi-annually for operations conducted under the Compliance Plan, and annually for East Landfill detection monitoring. □

Summary

Clean Harbors Deer Park Groundwater Monitoring and Remediation System	
Depth to First Groundwater	8 - 25' below surface
Type/Classification	Unconfined (vadose zone)
Unsaturated Soil Permeability	10^{-5} - 10^{-6} cm/sec
Depth of Unsaturated Zone	8 - 15'
Depth to Usable Aquifer	400' (industrial water supply)
Regional Groundwater Flow Direction	N - NW
Confining Layers Above Aquifer	Yes
Distance to Nearest Fault	2 miles
Seismic Activity, USGS Zone	0
Groundwater Monitoring System Wells (Depth of wells 25' - 115')	157 (as of 4/1/2010)
Point of Compliance Wells	33
Background wells	3
Corrective Action Observation wells	59
Observation wells	10
Corrective Action System (remediation and recovery) Wells (includes 13 French drains)	28
East Landfill monitoring wells	24

V. ENVIRONMENTAL AFFAIRS

Environmental Philosophy

Clean Harbors is an organization committed to providing environmental security and protection to our customers in both the private and public sectors, to our employees, and to the communities in which we operate.

Each Clean Harbors employee will ensure that high standards of health, safety, and environmental protection are enforced and observed at all times. We will work closely with regulatory agencies and industry associations to develop and comply with sound environmental protection policies. We will act quickly to implement new environmental protection initiatives and will maintain a standard that surpasses our legal responsibilities.

We will recycle, reuse, and recover resources as an alternative to disposal wherever technically feasible and economically viable.

We will routinely conduct environmental audits of our operations and will act promptly to respond to any deficiencies we may find.

Our Board of Directors and executive management will monitor each operating unit and will ensure that these principles are maintained.

Functionality

It is the intent of the management of CHDP to ensure that we comply with all applicable environmental regulations and conditions specified in each of our permits. Standard Work Practices, Standard Operating Procedures, and specific monitoring programs are used to ensure that we maintain sound environmental practices. Our internal audit process ensures that we appropriately identify, report, and promptly resolve any environmental or permit non-conformances.

Facility Inspection Program

The CHDP facility employs an extensive facility inspection program. All areas of the facility are inspected daily or weekly. An overview of the program is available during a site visit.

Compliance History

Compliance History Summary - ATTACHMENT 7

VI. HEALTH AND SAFETY

Principles

CHDP is committed to the safety of its employees and surrounding community. Through continuous safety improvement, we strive to attain the highest standards of safety excellence. The following principles are the foundation of our program:

- All injuries and occupational illnesses can be prevented.
- Management is directly responsible for preventing injuries and illnesses.
- Safety is a condition of employment.
- Training is an essential element for a safe workplace.
- Deficiencies must be corrected promptly.
- It is essential to investigate all accidents and incidents.
- Safety off the job is important.
- It's good business to prevent illnesses and injuries.
- People are the most important element in the success of a Health and Safety Program.

Functionality

Clean Harbors strives to provide a safe workplace for its employees, contractor personnel and others who may be present on the premises. This is achieved through the Process Safety Management program, the maintenance of a Safety Procedures Manual, along with our Standard Work Practices and Standard Operating Procedures, which provide instructions for the preventative measures, safe work practices, and training and emergency response procedures necessary for maintaining a safe workplace.

Emergency Response Team

- Over 40 volunteer members
- 24 hour/ 7 day per week coverage
- 10 Emergency Medical Technicians (EMT)
- Member Channel Industries Mutual Aid (CIMA)
- Trained per OSHA 1910.120, 1910.134, 1910.156N, NFPA 600, Channel Industries Mutual Aid (CIMA), and ICS Standard Operating Procedures

OSHA 300 Information

	CY2012	CY2011	CY2010	CY2009
Hours worked/year	648,883	626,027	622,551	636,048
Lost Workday Cases	2	4	1	2
DART[a]	0.664	1.278	0.643	0.629
TRIR[b]	0.664	1.597	0.643	1.257
EMR[c]	0.59	0.51	0.53	0.53

a- Days Away Restricted or Transferred
b- Total Recordable Incident Rate
c- Experience Modification Rate

ATTACHMENT 1

Clean Harbors Environmental Services
2027 Independence Parkway South
LaPorte, TX 77571
281.930.2300
Fax 281.930.2316
www.cleanharbors.com

March 28, 2013

VIA FEDERAL EXPRESS

Mr. Mark Stoebner
Texas Commission on Environmental Quality
Revenue Section, Financial Assurance
MC-184 P.O. Box 13087
Austin, Texas 78711-3087

RE: Insurance Certificates
Clean Harbors Deer Park, LLC
RN 102184173
CN 601558802

Dear Mr. Stoebner:

Enclosed please find an original certificate of insurance reflecting the inflation increase for policy number ENC 5254601-2. This policy has an effective date of September 6, 2006 and an expiration date of September 6, 2013.

The inflated closure, post-closure, and corrective action cost estimates were calculated by multiplying the current cost estimates by the annual inflation factor 1.018. This inflation factor was obtained from the Texas Commission on Environmental Quality's website http://www.tceq.state.tx.us/admin_folder/financial_administration/revenue/annual_inflation_factors.html on March 5, 2013.

Closure:	$16,007,165.69 x 1.018 = $16,295,294.67
Post-closure:	$6,757,877.35 x 1.018 = $6,879,519.14
Corrective action:	$4,126,491.10 x 1.018 = $4,200,767.94

Should you have any questions please do not hesitate to contact me via email at Honohan.kevin@cleanharbors.com or telephone at 281-930-2482.

Sincerely:

Kevin Honohan
Clean Harbors Deer Park, LLC

xc: Mr. James Sales, USEPA Region VI, Federal Express

CERTIFICATE OF INSURANCE

Name and Address of Insurer (herein called the "Insurer"):	Steadfast Insurance Company 1400 American Lane Schaumburg, Illinois 60196
Name and Address of Insured (herein called the "Insured"):	Clean Harbors, Inc. Clean Harbors Deer Park, LLC 42 Longwater Drive Norwell, Massachusetts 02061
Facilities Covered:	EPA Identification No. TXD 055141378 I&HW Permit #50089 Permittee Name: Clean Harbors Deer Park, LLC Physical and mailing address: 2027 Independence Parkway South La Porte, TX 77571 Closure Costs: $16,295,294.67 Post Closure Costs: $6,879,519.14 Corrective Action: $4,200,767.94
Face Amount:	$27,375,581.75
Policy Number:	ENC 5254601-02
Effective Date:	September 6, 2006

The Insurer hereby certifies that it has issued to the Insured the policy of insurance identified above to provide financial assurance for closure, post closure, or corrective action for the facilities identified above. The Insurer further warrants that such policy conforms in all respects with the requirements of 30 Texas Administrative Code § 37.241 (relating to insurance), as applicable and as such regulations were constituted on the date shown immediately below. It is agreed that any provision of the policy inconsistent with such regulations is hereby amended to eliminate such inconsistency.

Whenever requested by the Executive Director of the Texas Commission on Environmental Quality, the Insurer agrees to furnish to the executive director a duplicate original of the policy listed above, including all endorsements thereon.

I hereby certify that the wording of this certificate is identical to the wording specified in 30 Texas Administrative Code § 37.341, as such regulations were constituted on the date shown immediately below.

Mark Brazell
Senior Underwriter
Authorized Representative of:

Steadfast Insurance Company
Administrative Officer
1400 American Lane
Schaumburg, IL 60196-1056

Signature of witness or notary:

Date: 3/27/13

Endorsement # 19 Steadfast Insurance Company

THIS ENDORSEMENT CHANGES THE POLICY. PLEASE READ IT CAREFULLY.

POLICY NO.	EFF. DATE OF POLICY	EXP. DATE OF POLICY	EFF. DATE OF END.	PRODUCER	ADD'L PREMIUM	RETURN PREMIUM
ENC 5254601-02	**09/06/2006**	**09/06/2013**	**03/26/2013**	**18251-000**	**N/A**	**N/A**

This endorsement is issued by the company named in the Declarations. It changes the policy on the effective date listed above at the hour stated in the Declarations.

NAMED INSURED: Clean Harbors, Inc.
ADDRESS: 42 Longwater Drive
Norwell, MA 02061

This endorsement modifies insurance provided by the following:

Closure and Post Closure Environmental Liability Insurance Policy

CLAIMS MADE AND REPORTED COVERAGE

This endorsement, effective 12:01 a.m. March 26, 2013 forms a part of Policy No. ENC 5254601-02 issued to CLEAN HARBORS, INC. by Steadfast Insurance Company.

THIS ENDORSEMENT CHANGES THE POLICY. PLEASE READ IT CAREFULLY.
This endorsement modifies insurance provided under the following:

CLOSURE/POST CLOSURE LOCATION SCHEDULE

In Consideration of premium paid, it is hereby agreed that endorsement #17 is deleted in its entirety and replaced by the following:

CLOSURE AND/OR POST CLOSURE POLICY

Section I., INSURING AGREEMENT, applies to the location(s) listed below, but solely as respects liability of the INSURED:

Location(s) owned, leased or operated by the INSURED:

1. 500 Independence Parkway South
La Porte, TX 77571
EPA ID No. TXD 982 290 140
Closure Cost: $5,728,463.00

2. 4303 Profit Drive
San Antonio, TX 78219
Closure Cost: $336,637.64

3. 2 miles North of Altair, west side of the Highway 71
Altair, TX 77412
EPA ID No. TXD 980 624 274
Closure Cost: $4,132,779.44
Post-Closure Cost: $6,856,857.03

4. 2027 Independence Parkway South
La Porte, TX 77571
EPA ID No. TXD 055 141 378
Closure Cost: $16,295,294.67
Post-Closure Cost: $6,879,519.14
Corrective Action: $4,200,767.94

Item 5 on the declarations page is amended to read:

Limit of Liability: $44,430,318.86

All other terms and conditions remain the same.

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

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	Y		GLO 9681229-06	11/1/2012	11/1/2013	EACH OCCURRENCE	$ 2,000,000
	X COMMERCIAL GENERAL LIABILITY						DAMAGE TO RENTED PREMISES (Ea occurence)	$ 100,000
	CLAIMS-MADE X OCCUR						MED EXP (Any one person)	$ 5,000
	X XCU						PERSONAL & ADV INJURY	$ 2,000,000
	X Contractual						GENERAL AGGREGATE	$ 3,000,000
	GEN'L AGGREGATE LIMIT APPLIES PER:						PRODUCTS - COMP/OP AGG	$ 2,000,000
	POLICY X PRO-JECT LOC							$
A	AUTOMOBILE LIABILITY	Y		BAP 6681231-06	11/1/2012	11/1/2013	COMBINED SINGLE LIMIT (Ea accident)	$ 5,000,000
	X ANY AUTO						BODILY INJURY(Per person)	$
	ALL OWNED AUTOS / SCHEDULED AUTOS						BODILY INJURY(Per accident)	$
	X HIRED AUTOS / X NON-OWNED AUTOS						PROPERTY DAMAGE (Per accident)	$
	X MCS-90							$
B	X UMBRELLA LIAB X OCCUR			AUC4275262-08	11/1/2012	11/1/2013	EACH OCCURRENCE	$ 10,000,000
	EXCESS LIAB CLAIMS-MADE						AGGREGATE	$ 10,000,000
	DED RETENTION $							$
A	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY Y/N	N/A		WC 9681232-06	11/1/2012	11/1/2013	X WC STATU-TORY LIMITS OTH-ER	
	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? N						E.L. EACH ACCIDENT	$ 2,000,000
	(Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below						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, Additonal Remarks Schedule, if more space is required)

See Attached:

CERTIFICATE HOLDER

-- For Reference Only --

CANCELLATION

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

AGENCY CUSTOMER ID: 076900

LOC#:

ADDITIONAL REMARKS SCHEDULE

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

ADDITIONAL REMARKS

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

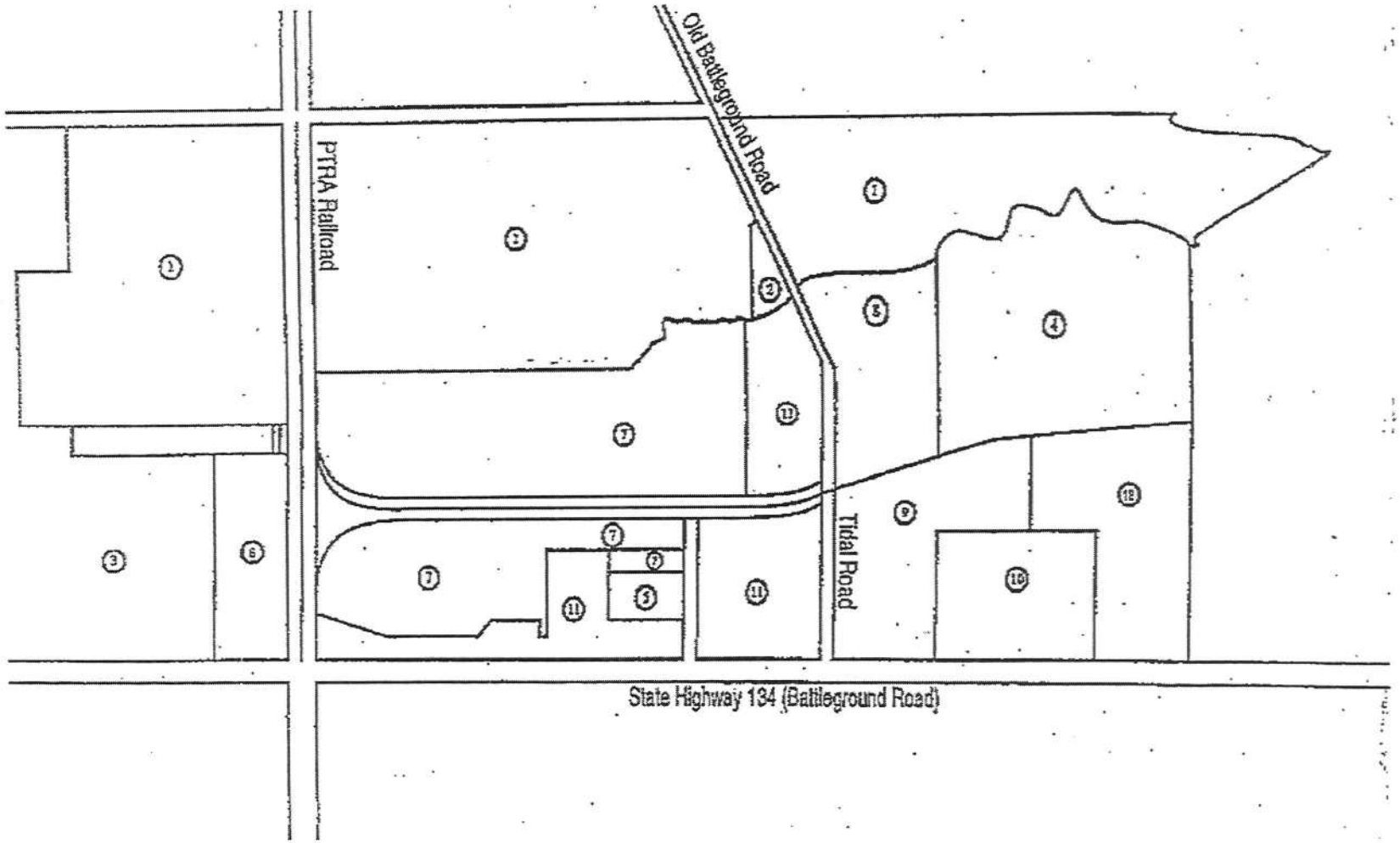
Environmental Impairment Liability
Policy Number: PLC-5834364-00
Carrier: Steadfast Insurance Company
Policy Period: 11/1/2012 - 11/1/2013
Limits:
$10,000,000 Each Claim
$10,000,000 Aggregate

ATTACHMENT
2

KEY FOR ADJACENT PROPERTY OWNERS

Property Owner	Address
1. Rohm & Haas Texas, Inc.	Highway 225 P. O. Box 672
2. Air Liquide America Corporation	2300 Tidal Road P. O. Box 7326
3. Dow-Hampshire Chemical Company	739 Independence Parkway S P. O. Box A
4. Mitsui & Co. (USA), Inc.	1000 Louisiana Suite 5700 Houston, Texas 77002
5. Clean Harbors Environmental Services, Inc.	2027 Independence Parkway S La Porte, Texas 77571
6. Clean Harbors Deer Park, LLC	2027 Independence Parkway S La Porte, Texas 77571
7. Clean Harbors Deer Park, LLC	2027 Independence Parkway S La Porte, Texas 77571
8. Global Octanes Corporation	2621 Tidal Road P. O. Box 190
9. Texas Molecular	2025 Independence Parkway S P. O. Box 1914
10. DSI Transport	2401 Independence Parkway S
11. Intercontinental Terminals, Inc.	1943 Independence Parkway S
12. PAKTANK	2759 Independence Parkway S

ADJACENT PROPERTY OWNERS MAP



ATTACHMENT
3

HAZARDOUS WASTE PERMIT NO. 50089
EPA ID. NO. TXD 055141378
ISWR NO. 50089

Texas Commission on Environmental Quality
Austin, Texas

PERMIT FOR INDUSTRIAL SOLID WASTE MANAGEMENT SITE issued under provisions of TEXAS HEALTH AND SAFETY CODE ANN. Chapter 361 (Vernon)

Name of Permittee:	Clean Harbors Deer Park, LP 2027 Battleground Road La Porte, Texas 77571
Site Owner:	Clean Harbors Deer Park, LP 2027 Battleground Road La Porte, Texas 77571
Registered Agent for Service:	U.S. Corporation Littlefield Building Austin, Texas 78701
Classification of Site:	Hazardous and Nonhazardous Class 1 and Class 2 Industrial Solid Waste Storage, Processing, and Disposal, Off-site, Commercial

The permittee is authorized to manage wastes in accordance with the limitations, requirements, and other conditions set forth herein. This permit is granted subject to the rules of the Commission and other Orders of the Commission, and laws of the State of Texas. This permit does not exempt the permittee from compliance with the Texas Clean Air Act. This permit will be valid until canceled, amended, modified or revoked by the Commission, except that the authorization to store, process and dispose of wastes shall expire midnight, 10 years after the date of renewal permit approval. This permit was originally issued on March 15, 1988.

All provisions in this permit stem from State and/or Federal authority. Those provisions marked with an asterisk (*) stem from Federal authority and will implement the applicable requirements of HSWA for which the Texas Commission on Environmental Quality has not been authorized. Those provisions marked with a double asterisk (**) stem from federal authority only.

ISSUED: JAN 18 2005

For The Commission

TPDES PERMIT NO. WQ0001429000
[For TCEQ office use only -
EPA I.D. No. TX0005941]

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
P. O. Box 13087
Austin, Texas 78711-3087

This supersedes and replaces TPDES Permit No. WQ0001429000, issued on October 12, 2007.

PERMIT TO DISCHARGE WASTES
under provisions of
Section 402 of the Clean Water Act
and Chapter 26 of the Texas Water Code

Clean Harbors Deer Park, LLC

whose mailing address is

2027 Independence Parkway South
La Porte, Texas 77571

is authorized to treat and discharge wastes from an industrial and hazardous waste treatment, storage, and disposal facility (SIC 4953)

located at 2027 Independence Parkway, south of Tidal Road, west of State Highway 134, and east of and adjacent to Tucker Bayou in the City of Deer Park, Harris County, Texas

from Outfall 001 and Outfall 003 to Tucker Bayou (above tidal); from Outfall 002 to Tucker Bayou portion of Houston Ship Channel (tidal); and proposed Outfall 004 directly to Houston Ship Channel in Segment No. 1006 Houston Ship Channel Tidal of the San Jacinto River Basin

only according to effluent limitations, monitoring requirements and other conditions set forth in this permit, as well as the rules of the Texas Commission on Environmental Quality (TCEQ), the laws of the State of Texas, and other orders of the TCEQ. The issuance of this permit does not grant to the permittee the right to use private or public property for conveyance of wastewater along the discharge route described in this permit. This includes, but is not limited to, property belonging to any individual, partnership, corporation, or other entity. Neither does this permit authorize any invasion of personal rights nor any violation of federal, state, or local laws or regulations. It is the responsibility of the permittee to acquire property rights as may be necessary to use the discharge route.

This permit shall expire at midnight on May 1, 2014.

ISSUED DATE: October 21, 2011

For the Commission

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
AIR QUALITY PERMIT

A PERMIT IS HEREBY ISSUED TO
Clean Harbors Deer Park, LLC
AUTHORIZING THE CONTINUED OPERATION OF
Hazardous Waste Incinerator
LOCATED AT **La Porte, Harris County, Texas**
LATITUDE 29° 43' 35" LONGITUDE 95° 5' 40"

1. **Facilities** covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code § 116.116 (30 TAC § 116.116)]

2. **Voiding of Permit.** A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1)the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least10 percent of the estimated total cost of the project up to a maximum of $5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC § 116.120(a), (b) and (c)]

3. **Construction Progress.** Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC § 116.115(b)(2)(A)]

4. **Start-up Notification.** The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify to the Office of Permitting and Registration the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC § 116.115(b)(2)(B)]

5. **Sampling Requirements.** If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC § 116.115(b)(2)(C)]

6. **Equivalency of Methods.** The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC § 116.115(b)(2)(D)]

7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction; comply with any additional recordkeeping requirements specified in special conditions attached to the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC § 116.115(b)(2)(E)]

8. **Maximum Allowable Emission Rates.** The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources--Maximum Allowable Emission Rates." [30 TAC § 116.115(b)(2)(F)]

9. **Maintenance of Emission Control.** The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification for upsets and maintenance in accordance with §§ 101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC § 116.115(b)(2)(G)]

10. **Compliance with Rules.** Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC § 116.115(b)(2)(H)]

11. This permit may be appealed pursuant to 30 TAC § 50.139.

12. This permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC § 116.110(c)]

13. There may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC § 116.115(c)]

14. Emissions from this facility must not cause or contribute to a condition of "air pollution" as defined in TCAA § 382.003(3) or violate TCAA § 382.085, as codified in the Texas Health and Safety Code. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.

PERMIT 5064

Date: April 6, 2011

For the Commission

FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO

Clean Harbors Deer Park, L.P.

AUTHORIZING THE OPERATION OF

Clean Harbors Deer Park
Refuse Systems

LOCATED AT

Harris County, Texas

LATITUDE 29° 43' 35" LONGITUDE 95° 5' 40"

Regulated Entity Number: RN102184173

This permit is issued in accordance with and subject to the Texas Clean Air Act (TCAA), Chapter 382 of the Texas Health and Safety Code and Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122), Federal Operating Permits. Under 30 TAC Chapter 122, this permit constitutes the permit holder's authority to operate the site and emission units listed in this permit. Operation of the site and emission units listed in this permit are subject to all additional rules or amended rules and orders of the Commission pursuant to the TCAA.

This permit does not relieve the permit holder from the responsibility of obtaining New Source Review authorization for new, modified, or existing facilities in accordance with 30 TAC Chapter 116, Control of Air Pollution by Permits for New Construction or Modification.

The site and emission units authorized by this permit shall be operated in accordance with 30 TAC Chapter 122, the general terms and conditions, special terms and conditions, and attachments contained herein.

This permit shall expire five years from the date of issuance. The renewal requirements specified in 30 TAC § 122.241 must be satisfied in order to renew the authorization to operate the site and emission units.

Permit No: O1566 Issuance Date: November 12, 2007

For the Commission

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

OCT 22 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Timothy F. Kent
Facility Compliance Manager
Clean Harbors Deer Park, LP
2027 Battleground Road
Deer Park, TX 77536

Dear Mr. Kent:

We are in receipt of your letter of May 12, 2003, requesting a modification to the Clean Harbors Deer Park, LP polychlorinated biphenyl (PCB) commercial storage and incinerator disposal approval of September 6, 2002. You requested that the approval be modified to include a new in-ground tank (Bulk Feed Tank T-201) to better control waste feeds so as to reduce or eliminate automatic waste feed cut-offs, and to provide a uniform waste feed stream to the Train 1 PCB incinerator. This tank will be considered ancillary equipment to the incinerator. We have reviewed your request, and hereby approve Bulk Feed Tank T-201 for PCBs. A new condition II. B. 6. has been added to the enclosed conditions approving the use of T-201.

This approval becomes effective on the date of this letter, and shall expire on the date that the United States Environmental Protection Agency (EPA) makes its final determination on the Clean Harbors re-authorization request. The determination will include an evaluation of the risk burn that will be conducted in conjunction with the Maximum Achievable Control Technology (MACT) test. Violation of 40 CFR Part 761, or any condition included as part of this approval, may subject Clean Harbors to enforcement action under the Toxic Substances Control Act (TSCA) and/or other applicable laws and regulations. Such action could result in termination, revocation, or modification of this approval. Furthermore, receipt of evidence that: (1) a misrepresentation of any material fact has been made in any Clean Harbors submittal; (2) all relevant facts have not been disclosed; or (3) the nature of the disposal has substantially changed from the effective date of this approval may constitute sufficient cause for termination, revocation or modification of this approval. The EPA reserves the right to add, modify or delete

ATTACHMENT
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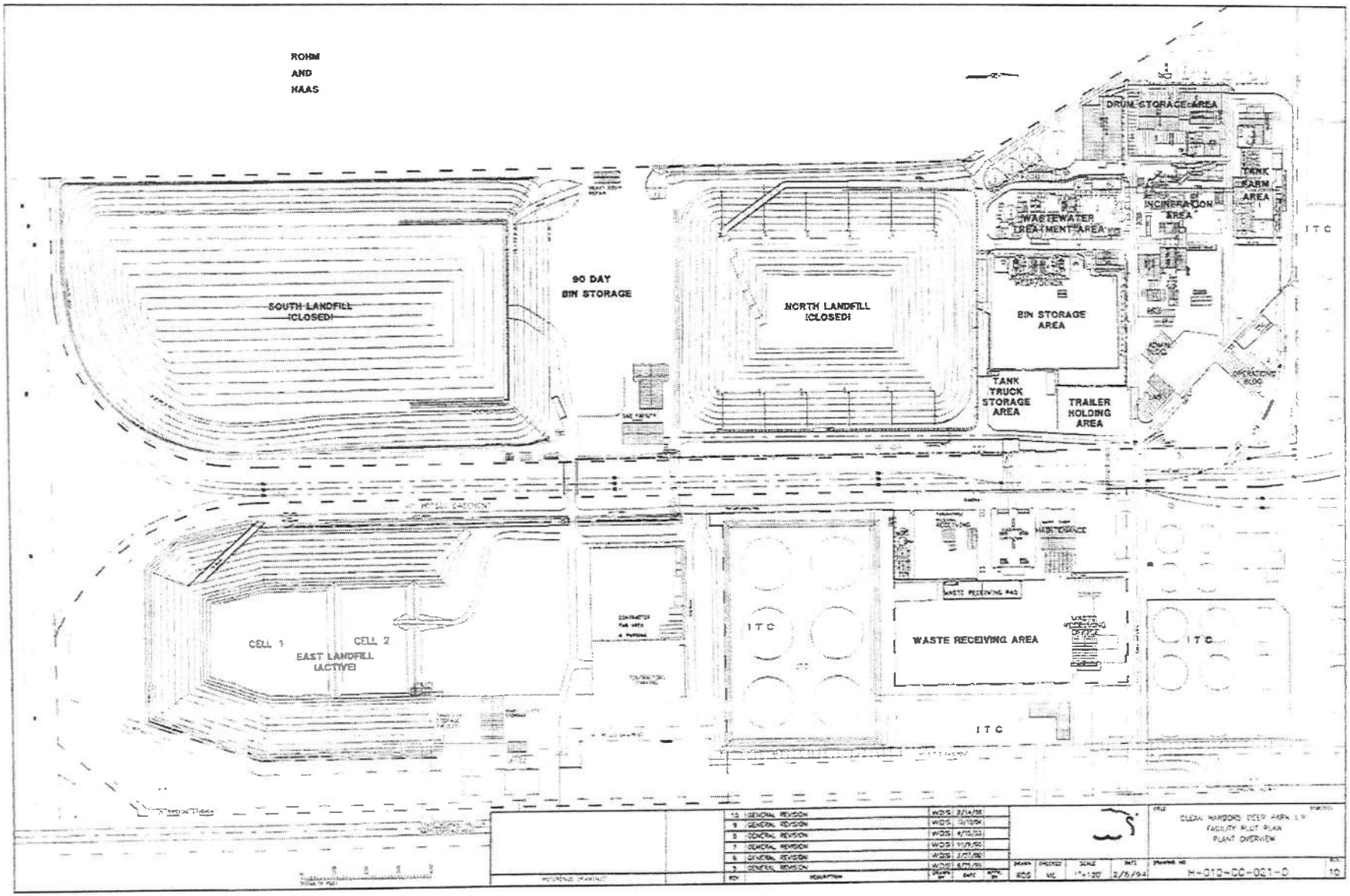
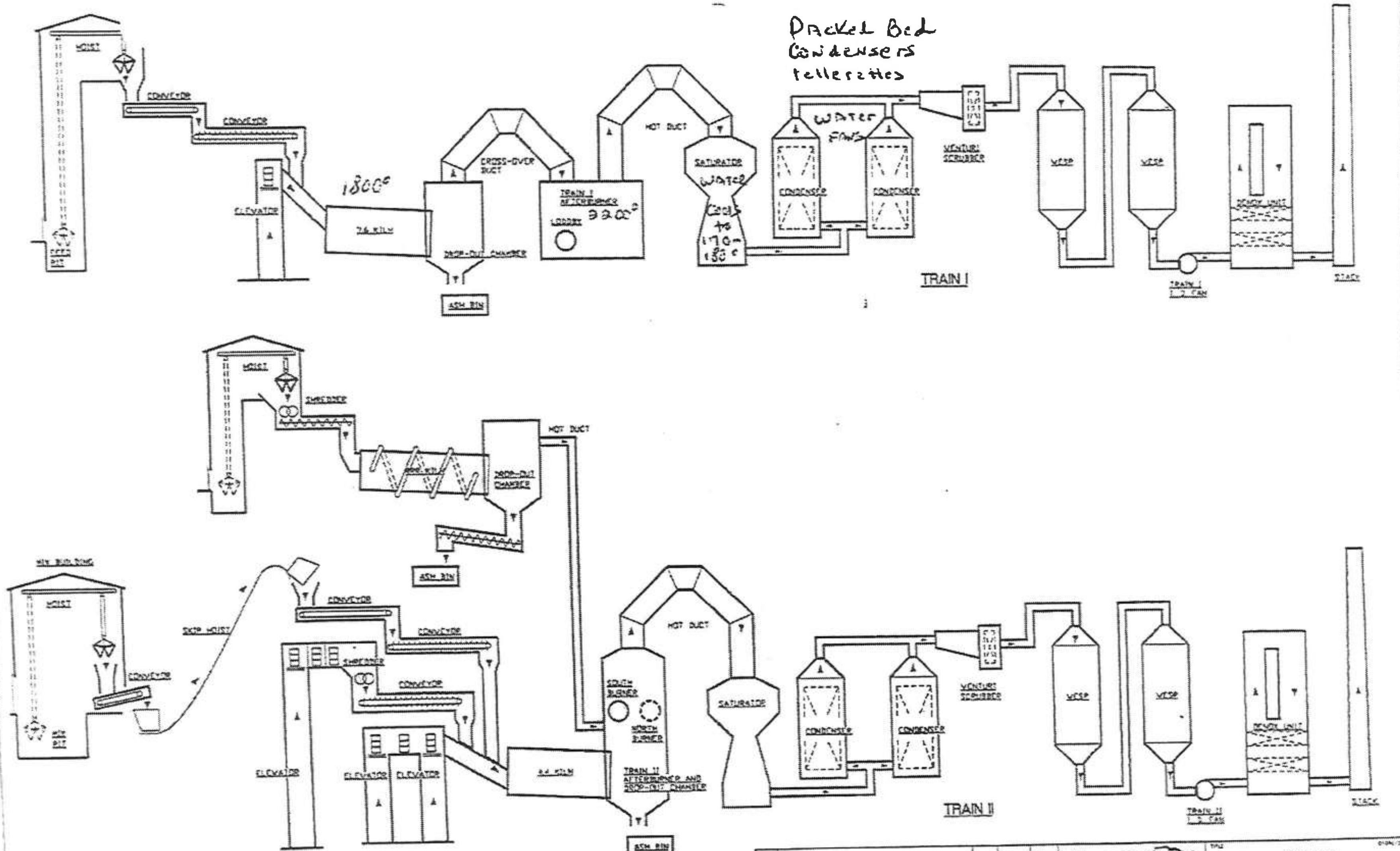

ROHM
AND
HAAS
DRUM STORAGE AREA
TANK FARM AREA
INCINERATION AREA
WASTEWATER TREATMENT AREA
90 DAY BIN STORAGE
SOUTH LANDFILL (CLOSED)
NORTH LANDFILL (CLOSED)
BIN STORAGE AREA
TANK TRUCK STORAGE AREA
TRAILER HOLDING AREA
ADMIN BLDG
OPERATIONS BLDG
MAINTENANCE
WASTE RECEIVING PAD
WASTE RECEIVING AREA
CELL 1
CELL 2
EAST LANDFILL (ACTIVE)
ITC
ITC
ITC
ITC
CLEAN HARBORS DEER PARK L.P.
FACILITY PLOT PLAN
PLANT OVERVIEW
H-010-CC-021-0

SITE PLAN
PROCESSING & ADMINISTRATION AREA
CleanHarbors
H-010-CC-030-0
ROADWAY
MAINT. SHOP
ELECTRICAL SUBSTATION
RECEIVING
ASPHALT ROAD



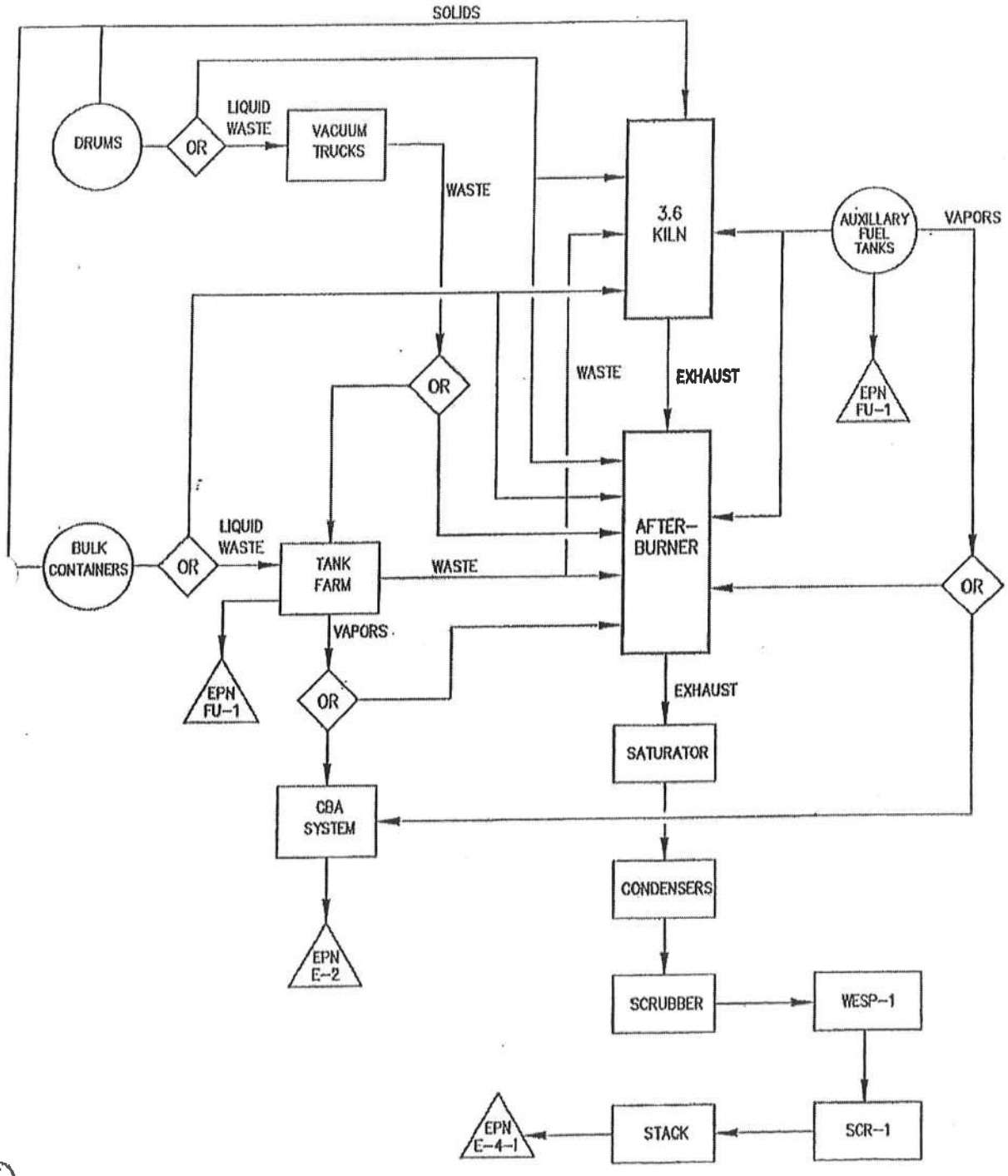
CleanHarbors

TRAIN I & II INCINERATION SYSTEMS

REV.	DESCRIPTION	DRAWN BY	DATE
1	GENERAL REVISION	WDS	5/21/02
0	ISSUED	WDS	12/19/00

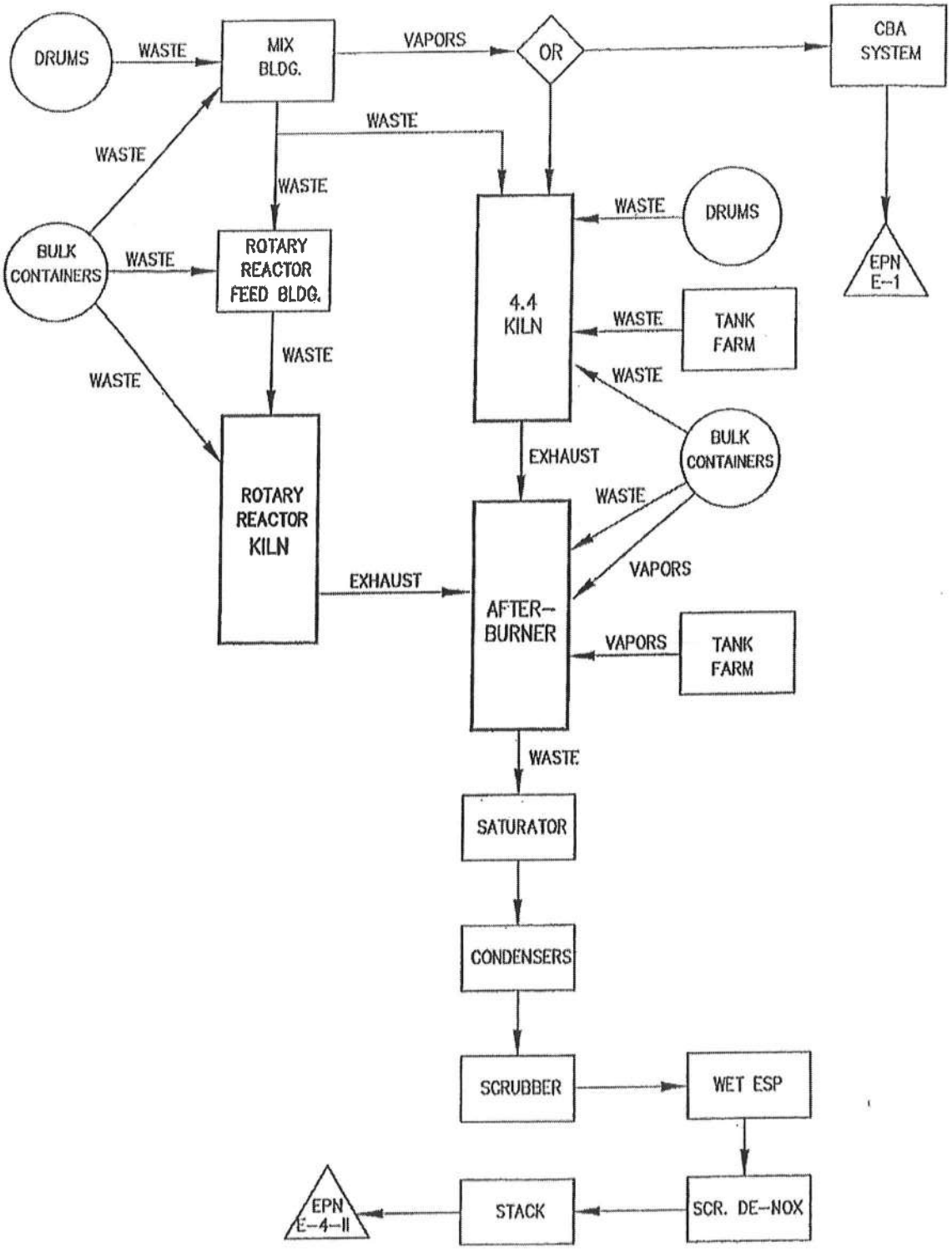
DRAWN	CHECKED	SCALE	DATE	DRAWING NO.	REV.
WDS		NTS	21/19/07	H-010-RE-123-C	1

TRAIN I INCINERATION SYSTEM



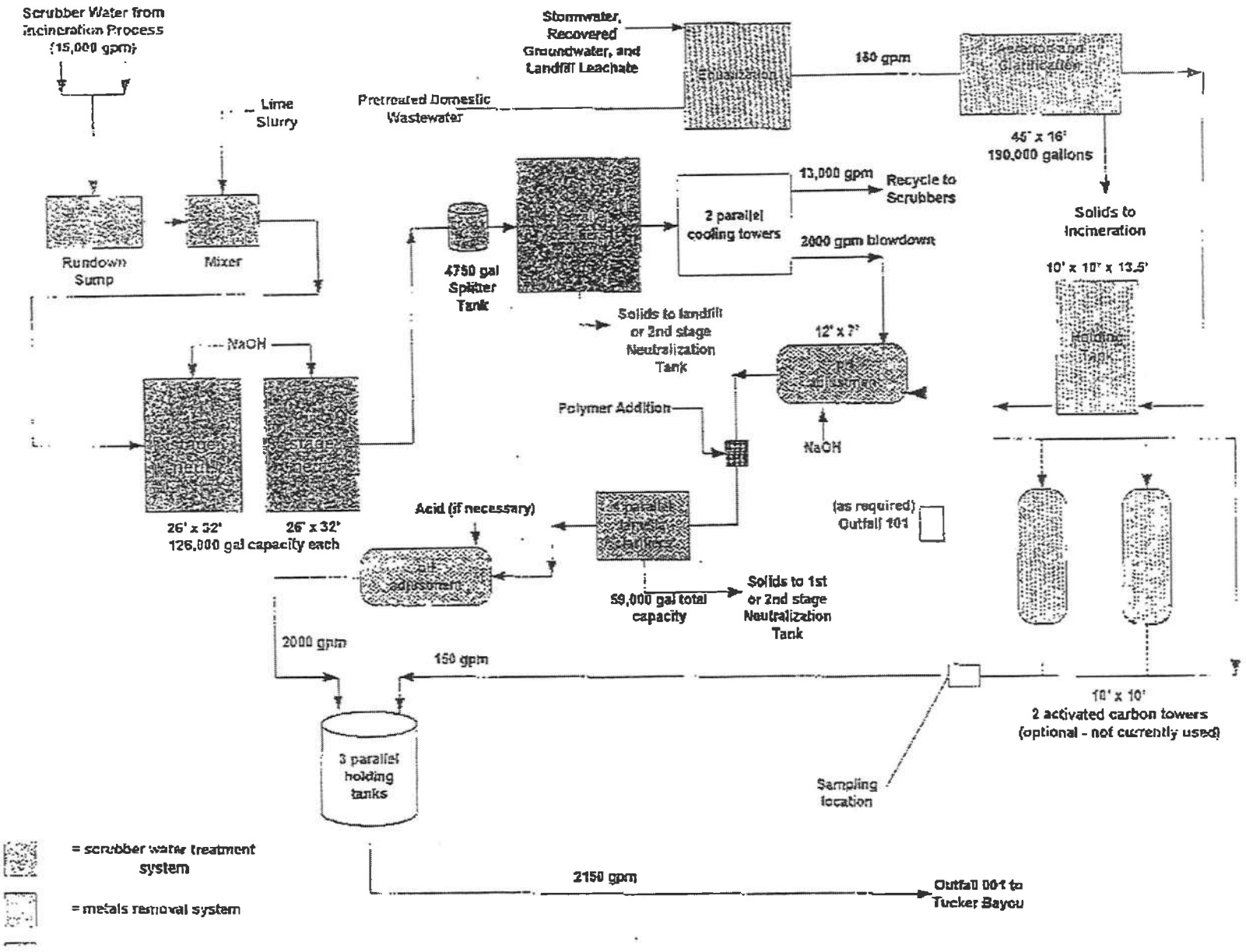
AIRPER1A

TRAIN II INCINERATION SYSTEM

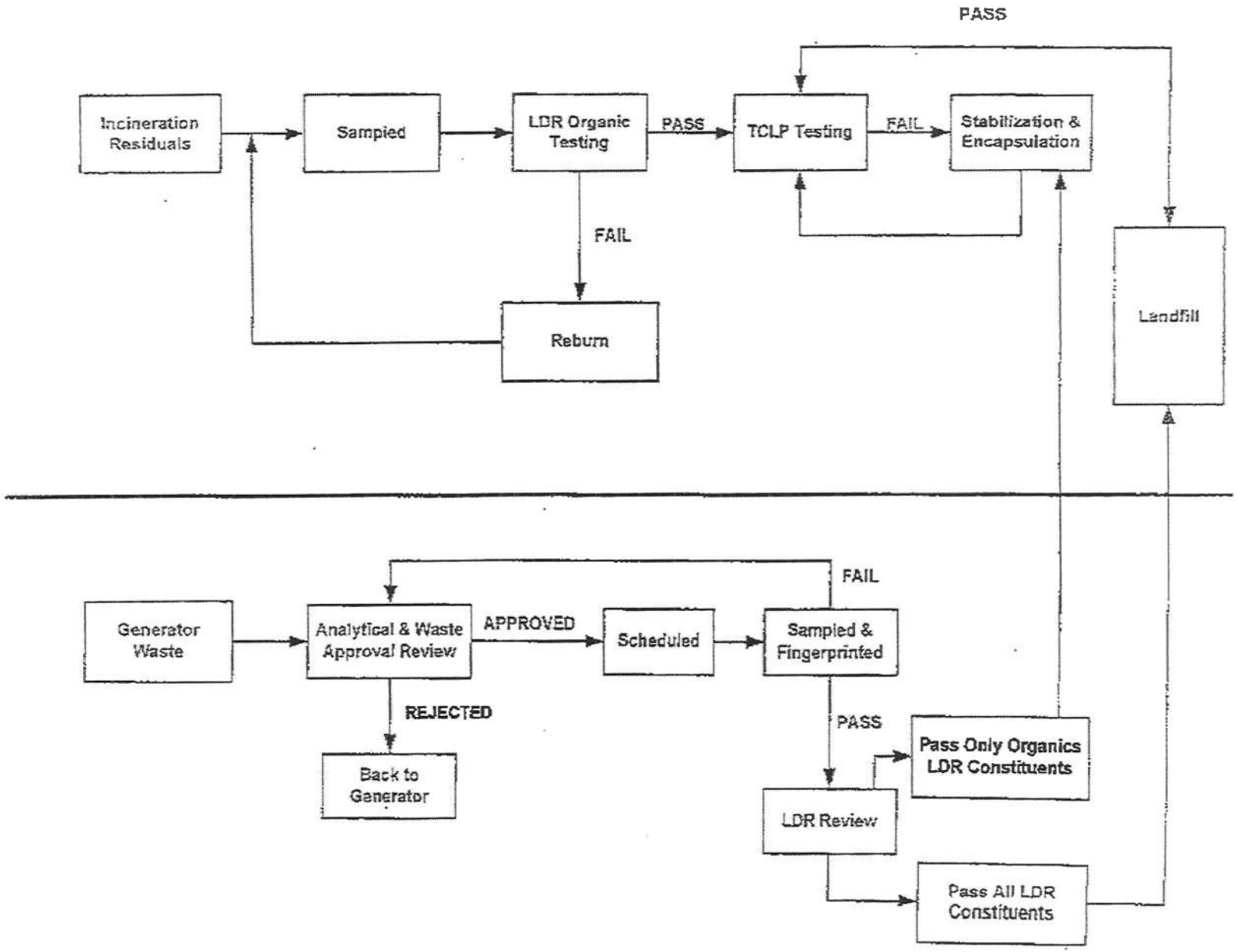


AIRPER5

CLEAN HARBORS DEER PARK, LP WASTEWATER TREATMENT SYSTEMS



LANDFILL FLOW DIAGRAM



ATTACHMENT
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TABLE V.B CONTAINER STORAGE AREAS

Permit Unit No.	*Container Storage Area*	*N.O.R. Unit #*	*WASTE NUMBER**	*Rated Capacity*	*Dimensions*	*STACKING HEIGHT*	*AISLE SPACING*	*Containment Volume (including rainfall for unenclosed areas) gallons*	*Unit will manage Ignitable,[1] Reactive,[1] or Incompatible[1] Waste (state all that apply)*
76a	DSP-1	36	101-107, 109-111	30,250 gal	30'x84.5' = 2535 sq ft	3 pallets	2 feet/4 feet**	6,084	Yes
76b	DSP-2	37	101-107, 109-111	37,060 gal	34'x114.25'=3885 sq ft	3 pallets	2 feet/4 feet**	13,088	Yes
76c	DSP-3	38	101-107, 109-111	113,870 gal	59.33'x125.62'=7453 sq ft	3 pallets	2 feet/4 feet**	13,991	Yes
76d	DSP-4	39	101-111	136,680 gal	irregular-4,708 sq ft	3 pallets	2 feet	15,198	Yes
76e	DSP-5	40	101-111	151,800 gal	irregular-6,993 sq ft	3 pallets	2 feet	28,137	Yes
76f	DSP-6	41	101-107, 109-111	170,000 gal	irregular-11,280 sq ft	3 pallets	2 feet	26,565	Yes
76g	DSP-7	42	101-111	19,800 gal	irregular-1,404 sq ft	3 pallets	2 feet	2,429	Yes
76h	Warehouse	43	101-111, 112	212,520 gal	irregular-12568 sq ft	4 pallets/racks	2 feet	64,761	Yes
77	Transformer/Drum handling Bldg.	34	101-111	163,980 gal	irregular-9,090 sq ft	3 pallets	2 feet	25,726	Yes
78	Container Storage Warehouse	7	101-107, 109-111	587,520 gal	22,963 sq ft	4 pallets/racks	2 feet/4 feet**	68,655	Yes
79[a]	Tank Truck Storage Pad	168	101-111	71,500 gal	irregular-6,954 sq ft	1 bin or trailer	2 feet	56,766	Yes
90	BSA-1[c]	69	103-108, 110,111	1,500 Cubic yds	75'x350'=26,250 sq ft	3 bins or 1 trailer	2 feet	None	Yes
91	BSA-2[c]	70	103-108, 110,111	4,650 Cubic yds	irregular-73,028 sq ft	3 bins or 1 trailer	2 feet	None	Yes
92	BSA-3[c]	71	103-108, 110,111	1,650 Cubic yds	101'x317'=32,017 sq ft	3 bins or 1 trailer	2 feet	None	Yes
101[b]	DSP-8	74	101-107, 109-111	23,700 gal	16.33'x87.91'=1,436 sq ft	3 pallets	2 feet	2,370	Yes
104	Front-line storage pad	035	101-111	60,500 gal	irregular-6,996 sq ft	1 bin or 1 trailer	2 feet	52,474	Yes
106	Waste Receiving Pad	167	103-107 110,111	212,100 gal	irregular-12,939 sq ft	1 bin or 1 trailer	2 feet	103,590	Yes

*Waste Numbers From Table IV.B, includes both on-site and off-site generated wastes.
** per NFPA Code

[a]Drummed or other containerized wastes (except wastes stored in tank trailers) shall be stored on Permit Unit No. 79 for a maximum of 90 days and only if waste containers remain on trailers until such time as the containers are transferred to another permitted treatment, storage, or disposal unit.

[b]Containerized waste shall only be placed into Permit Unit No. 101 while the Train I or Train II is operational and shall not be allowed to remain in Permit Unit No. 101 longer than 24 hours.

[c]All wastes must pass the paint filter test (EPA SW-846, Method 9095).

TABLE V.C TANKS AND TANK SYSTEMS

Permit Unit No.	*Tank*	*N.O.R. Unit #*	*Storage and/or Processing*	*Waste No.s*[1]	*Rated Capacity*[2]	*Dimensions*	*Containment Volume (including rainfall for unenclosed areas) Gallons*	*Unit Will Manage Ignitable, Reactive, or Incompatible Waste (State all that apply)*
09	T-1	84	STORE	101,102,108	20,000 g	12'x25'6"	418,721	YES
10	T-2	85	STORE	101,102,108	24,000 g	13'x25'6"	418,721	YES
11	T-11	86	STORE	101,102,108	15,000 g	10'x25'6"	418,721	YES
12	T-12	87	STORE	101,102,108	15,000 g	10'x25'6"	418,721	YES
13	T-18	88	STORE	101,102,108	24,000 g	13'x25'6"	418,721	YES
14	T-19	89	STORE	101,102,108	20,000 g	12'x25'6"	418,721	YES
15	T-20	90	STORE	101,102,108	7,000 g	7'7 ½"x22'0"	418,721	YES
16	T-21	91	STORE	101,102,108	7,000 g	7'7 ½"x22'0"	418,721	YES
17	T-27	92	STORE	101,102,108	14,600 g	11'6"x18'	418,721	YES
18	T-28	93	STORE	101,102,108	14,600 g	11'6"x18'	418,721	YES
19	T-31	94	STORE	101,102,108	27,000 g	12'x32'	418,721	YES
20	T-32	95	STORE	101,102,108	27,000 g	12'x32'	418,721	YES
21	T-60	96	STORE	101,102,108	100,000 g	25'x27'6"	418,721	YES
22	T-61	97	STORE	101,102,108	2000,00 g	33'x32'	418,721	YES
23	V-101	21	STORE	101,102,108	10,000 g	8'x29'8"	418,721	YES

TABLE V.C TANKS AND TANK SYSTEMS (CONT'D)

Permit Unit No.	*Tank*	*N.O.R. Unit #*	*Storage and/or Processing*	*Waste No.s*[1]	*Rated Capacity*[3]	*Dimensions*	*Containment Volume (including rainfall for unenclosed areas) Gallons*	*Unit Will Manage Ignitable, Reactive, or Incompatible Waste (State all that apply)*
24	V-103	22	STORE	101,102,108	10,500 g	8'x30'	418,721	YES
25	V-104	23	STORE	101,102,108	22,400 g	12'x26'	418,721	YES
26	V-105	98	STORE	101,102,108	22,400 g	12'x26'	418,721	YES
27	V-106	99	STORE	101,102,108	22,400 g	12'x26'	418,721	YES
28	V-107	100	STORE	101,102,108	22,400 g	12'x26'	418,721	YES
29	V-108	101	STORE	101,102,108	22,400 g	12'x26'	418,721	YES
30	V-109	102	STORE	101,102,108	21,000 g	10'x35'6"	418,721	YES
31	V-110	103	STORE	101,102,108	21,000 g	10'x35'6"	418,721	YES
37	T-29	109	STORE	101,102,108	6,400 g	7'3"x19'8"	27,590	YES
38	T-30	110	STORE	101,102,108	6,400 g	7'3"x19'8"	27.590	YES
39	T-70	111	STORE	101,102,108	22,200 g	10'4"x30'	418,721	YES
40	T-71	112	STORE	101,102,108	22,000 g	10'4"x30'	418,721	YES
41	T-72	113	STORE	101,102,108	22,000 g	10'4"x30'	418,721	YES
44	T-75	116	STORE	101,102,108	22,000 g	10'4"x30'	418,721	YES
45	T-76	117	STORE	101,102,108	22,000 g	10'4"x30'	418,721	YES

TABLE V.C TANKS AND TANK SYSTEMS (CONT'D)

Permit Unit No.	*Tank*	*N.O.R. Unit #*	*Storage and/or Processing*	*Waste No.s*[1]	*Rated Capacity*[3]	*Dimensions*	*Containment Volume (including rainfall for unenclosed areas) Gallons*	*Unit Will Manage Ignitable, Reactive, or Incompatible Waste (State all that apply)*
46	T-77	118	STORE	101,102,108	22,000 g	10'4"x30'	418,721	YES
87	T-1001-1	81	STORE/PROCESS	101-107, 109-111	75 yd^3	41.8'x10'x7.9'	128,902	YES
88	T-1001-2	82	STORE/PROCESS	101-107, 109-111	75 yd^3	41.8'x10'x7.9'	128,902	YES
89	T-1001-3	83	STORE/PROCESS	101-107, 109-111	75 yd^3	Irregular	128,902	YES
93	V-1204	121	STORE	101-105	13,500 g	12'x4'	30,661	NO
94[3]	T-1202	122	STORE/PROCESS	101-107, 109-111	125 yd^3	29.2'x19.5'x5.9'	Double Walled	NO
95[3]	T-1203	123	STORE/PROCESS	101-107, 109-111	125 yd^3	29.2'x19.5'x5.9'	Double Walled	NO
96[4]	T-1204	124	STORE/PROCESS	101-107, 109-111	350 yd^3	58'x60'x7.5'	NONE-no liquid	NO
107	T-201	Proposed	STORE/PROCESS	101-108. 110-111	7,198 g	Irregular	22,986	IGNITABLE
109	T-33	Proposed	STORE/PROCESS	101-107	21,000 g	12' x 24'	51,212	YES

1 – Waste Numbers From Table IV.B

2 – In accordance with permit Provision VII.A.

3 – Processing of wastes in Permit Units No. 94 or 95 is limited to a maximum of 60 working days annually, when Permit Unit No. 97 is out of service due to malfunction and/or regularly scheduled maintenance.

4 – No chemical or biological processing of wastes is authorized in Permit Unit No. 96.

TABLE V.K MISCELLANEOUS UNITS

Permit Unit No.	*Miscellaneous Unit*	*N.O.R. Unit #*	*Storage, Processing, and/or Disposal*	*Waste No.s*[1]	*Rated Capacity*	*Dimensions*	*Unit will manage Ignitable, Reactive, or Incompatible Waste (state all that apply)*
97	Pugmill B-1203	125	Process	101-107, 110, 111	22 yd^3	16'x8'x4.5'	No
99	Railcar Unloading Area	130	Storage, Process	101-105, 108	50,000 gal	120'x16'	Yes
100[2]	Rotary Reactor Feed Tower T-638	133	Storage	101-107, 109-111	7,575 gal	11.52'x11.09'x8.02'	Yes
102	Container QC Area	073	Storage	101-107, 109-111	75,000 gal	irregular	Yes
103	Direct Burn Area	131	Storage, Process	101-105, 108, 109	40,000 gal	4 irregular areas	Yes
105	PCB Shredder	015	Process	101-108, 110	3,945 gal	irregular	No
108	North Pad	171	Process	101-105, 108, 109	10,000 gal	irregular	Yes

[1]from Table IV.B, first column

[2] – Waste storage in Permit Unit No. 100 is permitted during operating shifts in which the Train II Incinerator Kiln is operating under normal conditions. Permit Unit No. 100 shall be maintained empty, as soon as practicable, at all other times.

ATTACHMENT
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TABLE IV.B WASTES MANAGED IN PERMITTED UNITS

No.	*Waste*	*EPA Hazardous Waste Numbers*	*TCEQ Waste Form Codes and Classification Codes*
1	Plant Refuse / Office Trash	None	9032
2	Lab Waste	All acceptable EPA waste numbers*	009H
3	PCB Contaminated Truck Washings	None	2191
4	Water Treatment Sludge (Filter Cake)	All acceptable EPA waste numbers except D001-D003*	504H
5	Leachate	F039	116H
6	Incinerator Ash	All acceptable EPA waste numbers except D001-D003*	303H
7	Lubricating Oil	None	2061
8	Hazardous Sludges – Tank Cleanouts	All acceptable EPA waste numbers*	695H
9	Spent Solvents	F001-F005	204H
10	Liquid, Listed Hazardous, Combustible, Flammable, Corrosive	F001-F005	219H
11	PCB Transformers	None	3961
12	Construction Debris	None	3903
13	PCB Contaminated PPE/Spill Cleanup	None	3941
14	PCB Contaminated Containers	None	3081
15	Scrubber Blowdown Process Wastewater	All acceptable EPA waste numbers except D001-D043*	115H
16	RCRA – Empty Crushed Drums	None	3081
17	PCB Coupling, Capacitors, Bushings	None	397H
18	Wooden Pallets	None	4882

TABLE IV.B WASTES MANAGED IN PERMITTED UNITS

No.	*Waste*	*EPA Hazardous Waste Numbers*	*TCEQ Waste Form Codes and Classification Codes*
19	Tellerettes	None	4031
20	Spent Carbon	D001	404H
21	Recovered Groundwater	F039	116H
22	Stabilized Incineration Residuals	All acceptable EPA waste numbers except D001-D043*	303H
23	Stormwater Runoff	None	1191
24	PCB Decontamination Water	None	1141
25	RCRA Decontamination Washwater (Active Landfill)	All acceptable EPA waste numbers except D001-D043*	114H
26	Construction Debris	None	3902
27	Contaminated Construction Debris	All acceptable EPA waste numbers*	319H
28	RCRA Decontamination Washwater (Mix Building)	All acceptable EPA waste numbers*	219H
29	Contaminated PPE, Spill Cleanup, Satellite Accumulation Waste	All Acceptable EPA waste numbers*	319H
30	Recovered Groundwater	None	1191
31	Tellerette Rinsate	All acceptable EPA waste numbers except D001-D003*	119H

TABLE IV.B WASTES MANAGED IN PERMITTED UNITS

No.	*Waste*[1]	*EPA Hazardous Waste Numbers*	*TCEQ Waste Form Codes and Classification Codes*
101	Inorganic Liquids	All permitted EPA waste numbers	H, 1, 2, 3
102	Organic Liquids	All permitted EPA waste numbers	H, 1, 2, 3
103	Water-based Sludges	All permitted EPA waste numbers	H, 1, 2, 3
104	Inorganic Sludges	All permitted EPA waste numbers	H, 1, 2, 3
105	Organic Sludges	All permitted EPA waste numbers	H, 1, 2, 3
106	Inorganic Solids	All permitted EPA waste numbers	H, 1, 2, 3
107	Organic Solids	All permitted EPA waste numbers	H, 1, 2, 3
108	PCB Wastes[2]	N/A	N/A
109	Contaminated Gases	All permitted EPA waste numbers	H, 1, 2, 3
110	Contaminated Soils	All permitted EPA waste numbers	H, 1, 2, 3
111	Incinerator Ash	All permitted EPA waste numbers	H, 1, 2, 3
112	Dioxin Wastes	F020, F021, F022, F023, F026, F027, F028	H, 1, 2, 3

[1]includes both on-site and off-site wastes
[2]PCB's or non-hazardous industrial solid waste contaminated only with PCB's

permittee has the appropriate permits and will accept the waste the generator is shipping. The permittee shall keep a copy of this written notice as part of the operating record. [40 CFR 264.12(b)]

[IV.B.]

3. The wastes authorized in Table IV.B. shall not contain any of the following:

   a. Polychlorinated biphenyls (PCBs), as defined by the EPA in regulations issued pursuant to the Toxic Substances Control Act under Title 40 Code of Federal Regulations (CFR) Part 761, unless the permittee is complaint with the federal requirements for PCB storage and processing as specified in 40 CFR Part 761;

   b. Radioactive wastes unless the permittee is authorized to store, process and dispose of these wastes in compliance with specific licensing and permitting requirements under Chapter 401 of the Texas Health and Safety Code and the rules of the Texas Commission on Environmental Quality or Texas Department of Health or Texas Railroad Commission, and/or any other rules of state or federal authorities;

   c. Explosive material, as defined by the Department of Transportation under 49 CFR Part 173;

   d. Dioxin-containing wastes, identified by EPA as F020, F021, F022, F023, F026, and F027 wastes in 40 CFR 261.31, except for storage only in authorized units;

   e. Municipal garbage;

   f. Special Waste from Health-Care Related Facilities subject to 25 TAC Chapter 1 and TAC Chapter 330 (except when processed immediately in Permit Units No. 03 or 04 only);

   g. Pyrophorics (except when processed immediately in Permit Units No. 03 or 04 only;

   h. Cyanide or sulfide compounds with ten (10) percent or greater concentrations of CN^- or S^- (except in lab packs, compressed cylinders, and liquid storage containers); or

   i. Liquid organic peroxides (except when stored for a period up to 14 calendar days in Permit Unit No. 77, as described in the application, or processed immediately in Permit Units No. 03 or 04 only);

4. Prior to accepting any additional wastes not authorized in Table IV.B, the permittee shall follow the permit amendment or modification requirements listed in 30 TAC Section 305.62 and 305.69.

5. The permittee may store wastes restricted under 40 CFR Part 268 solely for the purpose of accumulating quantities necessary to facilitate proper recovery, treatment, or disposal provided that it meets the requirements of 40 CFR 268.50(a)(2) including, but not limited to the following:

   a. Clearly marking each container to identify its contents and the date each period of accumulation begins;

SUBJECT: Waste Acceptance Based on EPA Waste Codes and Waste Constituents

EPA Waste Codes

Attachment 1 is a complete list of EPA waste codes that currently exist. All except the codes with "N" indicated on the left of the codes are acceptable for treatment or disposal at Cleanharbors Deer Park. The **unacceptable codes** are summarized below:

D003EX	F020	K061*	P015*	P113*	U151HM
D003UO	F021	K069NCS*	P065HMIRR*	P115*	U214*
D006CB	F022	K088*	P076	P119*	U215*
D008LB	F023	K106HM	P078	P120*	U216*
D009HM(inorg.)	F026	K161*	P087*	P196*	U217*
	F027	K173	P092HMIRR*	P205*	
	F028	K174			
		K175			
		K176			
		K181			

Some of these unacceptable codes may be received under special exemptions as indicated on Cleanharbors Deer Park Waste Receiving Report / Lab Notes for particular waste streams. If acceptable for receipt, a special suffix will be attached to the code for acceptance. Examples are:

AD=ADGAS Done ST=Storage Only
LP =Lab Pack Only and Compliance with 40 CFR §268.42 (c)
(Shown with * in the above list)

Waste Constituents Currently the only unacceptable waste constituent is "Dithiocarbamates".

EPA CODE SUBCATEGORY LEGEND

AN = Anhydrous	IR =	INCIN Residues	NRR =	Non-RMERC Residues
CB = Cadmium Battery	IRR =	INCIN or RMERC Residues	OR =	Other Reactives [40 CFR 261.23(a)(1)]
CS = Calcium Sulfate	LB =	Lead Acid Battery	RC =	Reactive Cyanide [40 CFR 261.23(a)(5)]
EX = Explosive *	LM =	Low Mercury (< 260 mg/kg)	RR =	RMERC Residues
HM = High Mercury (>/=260 mg/kg)	LQ =	Liquid >/= 10% TOC	RS =	Reactive Sulfide [40 CFR 261.23(a)(5)]
HY = Hydrated	NCS =	Non-Calcium Sulfate	TOC =	Total Organic Carbon
ICW = Ignitable Characteristic Waste	NIRR =	Non-Incineration or non-RMERC Residues	UO =	Unexploded Ordnance
			WR =	Water Reactive

* Subcategory based on 40 CFR §261.23(a)(6), (7), & (8)

Attachment

ATTACHMENT 7

Enforcement Action Summary Report

Facility *Deer Park*

Date Recieved	Agency	Enforcement Type	Alleged Violation	Proposed Penalty	Status	Resolution Date	Penalty Paid
7/7/2008	TCEQ	Notice of Non-Compliance	Data for POX and NPOX were not submitted for Outfall 002A	$0.00	Resolved		$0.00
		EA Number:	***Description of Resolution:***		Data submitted.		
9/2/2008	TCEQ	Notice of Violation	Failure to submit annual Title V certification report a Title V deviation report.	$0.00	Resolved		$4,760.00
		EA Number:	***Description of Resolution:***		Since the green certified mail receipt was not produced, TCEQ deemed that the reports were not submitted in a timely manner.		
1/30/2009	TCEQ	Notice of Non-Compliance	Failure to comply with effluent limits for POYNPOX at the 002 outfall.	$0.00	Resolved		$0.00
		EA Number:	***Description of Resolution:***		Permit language was clarified that POYNPOX are not required to be included in the DMR.		

2/9/2009	TCEQ	Warning Letter/Notice	Notice pertaining to self-reported data for POX/NPOX for the time period of 7/2007 to 6/2008. Failure to comply with permit effluent for purge able organic halides; failure to comply with other permit effluent limits during the period of 7/2007 thru 6/2008.	$0.00	Resolved 1/4/2012	$0.00
		EA Number:	***Description of Resolution:***		Permit was reopened and language modified to clarify the standards.	
3/19/2009	TCEQ	Penalty Notice	Failure to meet the TSS limit for the domestic treatment plant.	$0.00	Resolved	$0.00
		EA Number:	***Description of Resolution:***		Increased aeration	
3/19/2009	TCEQ	Penalty Notice	Failure to maintain a residual chlorine level of 1.0 mg/l a the exit of the STP.	$0.00	Resolved w/o Penalty	$0.00
		EA Number:	***Description of Resolution:***		Chlorine pump was repaired. Permit condition was removed.	
3/19/2009	TCEQ	Penalty Notice	Very few microorganisms in the aeration basin at the time of the inspection.	$0.00	Resolved w/o Penalty	$0.00
		EA Number:	***Description of Resolution:***		System was reseeded.	

4/4/2009	TCEQ	Notice of Violation	Some of the AVO records for NH3 have not been kept in date order.	$0.00	Resolved w/o Penalty		$0.00
		EA Number:		***Description of Resolution:***	Records reorganized.		
4/4/2009	TCEQ	Notice of Violation	Failure to cap an open end.	$0.00	Resolved w/o Penalty		$0.00
		EA Number:		***Description of Resolution:***	Report submitted		
4/4/2009	TCEQ	Notice of Violation	CEMS downtown report needs to be submitted as a separate report and not included in Subtitle DD semi-annual report.	$0.00	Resolved		$0.00
		EA Number:		***Description of Resolution:***	Submitted with operation reports		
4/8/2009	TX Commission on Environ. Quality	Notice of Violation	Failure to provide secondary treatment for domestic waste water treatment at domestic waste water treatment plant.; Failure to maintain compliance with permit effluent limits for chlorine at domestic waste water treatment plant; Failure to meet the effluent permit limit for Total Suspended Solids at the domestic waste water treatment plant.	$0.00	Resolved w/o Penalty	9/22/2009	$0.00
		EA Number:	WQ0001429-000	***Description of Resolution:***	Provided additional documentation to the TCEQ.		

3/21/2010	Harris County Pollution Control	Notice of Violation	Failure to maintain a chlorine effluent limit from the STP.	$0.00	Resolved w/o Penalty	$0.00
		EA Number:	***Description of Resolution:***		Permit amended to remove the condition	
5/27/2010	Harris County Public Health Dept.	Notice of Violation	Harris County Public Health & Environmental Services (HCPHES) collected samples from the sewer treatment plant on March 29, 2010. Analysis of these samples determined violations of discharge permit number WQ01429.The permit limit for chlorine is a minimum of 1.0 mg/l. On March 29, 2010 Chlorine concentration was 0.03 mg/l.	$0.00	Resolved w/o Penalty	$0.00
		EA Number:	***Description of Resolution:***		Permit condition removed	
5/27/2010	Harris County Public Health Dept.	Notice of Violation	Harris County Public Health & Environmental Services (HCPHES) collected samples from the sewer treatment plant on April 15, 2010. Analysis of these samples determined violations of discharge permit number WQ01429.The permit limit for chlorine is a minimum of 1.0 mg/l. On April 15, 2010 the Chlorine concentration was 0.17 mg/l.	$0.00	Resolved w/o Penalty	$0.00
		EA Number:	***Description of Resolution:***		Permit condition removed	

11/11/2010	TCEQ	Notice of Violation	The Excess Opacity Event occurred on September 18, 2010 at 13:27 and was reported on September 20, 2010 at 10:32. TCEQ has determined that the excess opacity event was not reported within 24 hours of discovery in violation of 30 TAC 101.201(e).	$0.00	Resolved w/o Penalty	3/17/2010	$0.00
		EA Number:		***Description of Resolution:***	Implemented a new procedure to ensure reporting within 24 hours. A written description of the corrective action taken was submitted to the TCEQ.		
2/3/2011	TCEQ	Notice of Violation	1) Failure to comply with effluent limitations for metals for the periods ending 10/31/10 and 11/30/10. 2) Failure to comply with other effluent parameters during the period of 12/2009-11/2010	$0.00	Resolved		$0.00
		EA Number:	893069	***Description of Resolution:***	Resolved by installing a new discharge pipeline		
2/16/2011	TCEQ	Notice of Violation	Issues resulting form November 18, 2010 - December 3, 2010 inspection, Alleged Violations: 1) Failed to update its Notice of Registration as required, 2) Failure to provide documentation of inspections. Alleged Areas of Concern: 1) Failure to mark a tank with the permit number, 2) Incorrect waste code entered on the Annual Waste Summary report, 3) Failed to maintain easily retrievable waste classification and determination documentation for on-site generated solid waste. All alleged violations have been resolved	$0.00	Resolved		$0.00
		EA Number:		***Description of Resolution:***	Documentation provided to TCEQ		

7/21/2011	TCEQ	Notice of Violation	Clean Harbors failed to prevent the processing of undisclosed dioxin forming compounds that were in a waste stream.	$6,700.00	Resolved	12/7/2011	$4,360.00
		EA Number:	2011-1348-IHW-E	***Description of Resolution:***	An administrative consent order with the payment of a civil penalty in the amount of $4,360.00 resolved this allegation.		
8/23/2011	TCEQ	Notice of Violation	Findings from Title V inspection by TCEQ; there were a number of open ended pipes found that were required to be capped	$0.00	Resolved w/o Penalty	8/23/2011	$0.00
		EA Number:	924373	***Description of Resolution:***	Lines were capped		
9/16/2011	TCEQ	Consent Administrative Order	Inability to comply with permitted effluent limits for cadmium, silver, nickel and zinc.	$23,900.00	Resolved	10/5/2011	$9,560.00
		EA Number:	2011-0253-IWD-E	***Description of Resolution:***	Pipeline to discharge effluent in Houston Ship Channel constructed		
11/7/2011	US EPA	Notice of Violation	1) Failure to develop and implement a Risk Management Plan management system, 2) Failure to provide adequate documentation of the worst case scenario, 3) Failure to Document That Respondent Considered a Range of Alternative Release Scenarios, 4) Failure to update the Process Hazard Analysis (PHA) at the appropriate frequency, 5) Failure to Make Operating Procedures Readily Accessible to Employees, 6) Failure to Update the Emergency Contact Information in a Timely Manner	$46,200.00	Resolved	4/17/2012	$39,200.00
		EA Number:	CAA-06-2012-3506	***Description of Resolution:***	Payment of a Civil Penalty		

9/5/2012	TCEQ	Notice of Violation	Failure to include the signature of the person making a determination to delay repairs on the form documenting the decision.	$0.00	Resolved w/o Penalty	9/5/2012	$0.00

EA Number:

Description of Resolution: Updated the form to include a signature line and retrained employees.

9/17/2012	TCEQ	Warning Letter/Notice	Failure to comply with the vanadium discharge limit for the monitoring periods ending 3/31/12 and 5/30/12	$6,000.00	Dismissed		

EA Number:

Description of Resolution: Recalculated the monthly averages and revised calculations all within discharge parameters. NOV withdrawn.