

HAZARDOUS WASTE FACILITY PERMIT

In compliance with the provisions of the Vermont Waste Management Act, as amended,
(10 V.S.A. Chapter 159)

**ENPRO Services of Vermont, Inc.
54 Avenue D
Williston, Vermont 05495**

is authorized to operate a hazardous waste storage facility at the above location in accordance with the conditions and requirements set forth in this permit.

This permit shall become effective on the date of signing.

Signed this 29th day of SEPTEMBER, 2010

Justin G. Johnson, Commissioner
Department of Environmental Conservation

By _____


George Desch, Director
Waste Management Division
Department of Environmental Conservation
103 South Main Street/West Building
Waterbury, Vermont 05671-0404

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**State of Vermont
Agency of Natural Resources**

HAZARDOUS WASTE FACILITY PERMIT

**10 V.S.A. Chapter 159
Vermont Hazardous Waste Management Regulations § 7-504**

Applicant: ENPRO Services of Vermont, Inc.
54 Avenues D
Williston, Vermont

EPA ID No: VTR000517052

Facility: ENPRO Services of Vermont, Inc.
54 Avenues D
Williston, Vermont

Permit Period: Ten (10) years from date of signing

FINDINGS OF FACT

1. ENPRO Services of Vermont, Inc., (hereafter called EVI), operates a hazardous waste storage facility located at 54 Avenue D, Williston, Vermont. The land on which the EVI facility is located, including the 18,000 square foot building improvement, is owned by DAC III, LLC.
2. Wastes from businesses and organizations in New England and beyond are shipped to and temporarily stored at the EVI facility. In addition to managing hazardous waste, EVI manages non-hazardous waste and waste that is exempted or conditionally exempted from regulation under the Vermont Hazardous Waste Management Regulations (VHWMR), and is authorized by EPA as a commercial storer of PCB waste under the Toxic Substances Control Act. A description and drawings of the EVI facility are provided in **Appendix B** of this permit.
3. The facility currently operated by EVI began operating as a hazardous waste storage facility under a permit issued to Pollution Solutions of Vermont, Inc., on July 12, 1989, and renewed on February 28, 1995. On February 26, 1998, that permit was transferred to Heritage Environmental Services, Inc. Although the original permit was scheduled to expire on February 27, 2000, through the submittal of a timely and administratively complete renewal application by Heritage Environmental Services, Inc., the permit issued on February 28, 1995, was continued in full force and effect pursuant to 3 V.S.A. § 814(b) and VHWMR § 7-504(h).

4. This permit governs the management and storage of hazardous waste pursuant to 10 V.S.A. Chapter 159 and the VHWMR, non-hazardous waste and waste that is exempted or conditionally exempted from regulation under the VHWMR at the EVI facility.
5. **EVI** has submitted information determined by the Agency to be equivalent to a RCRA Facility Assessment (RFA) and RCRA Facility Investigation (RFI). This information is included in the administrative record for **EVI** within the Waste Management Division's Sites Management Section file # 91-1097. This information describes whether any releases or likely releases have occurred.
6. At this time, there is no known release of hazardous constituents to the environment at the EVI facility and, in accordance with 40 CFR Part 264 Subparts F and S, no corrective action, as referenced in **Section 11** of this permit, is necessary at this time.

CONDITIONS

Section 1: General Conditions

- 1.1 For the purposes of this permit, the terms used herein shall have the same meaning as those in the VHWMR and 40 CFR Parts 124, 264, 266, 268 and 270, unless this permit specifically states otherwise. Where terms are not defined in the VHWMR, 40 CFR, or the permit, the meaning associated with such terms shall be defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.
- 1.2 As used in this permit, the term "permit" has the same meaning as "certification" as used in the VHWMR and 10 VSA § 6606.
- 1.3 As used in this permit, the term "Director" means:

Division Director - Waste Management Division
Department of Environmental Conservation
Vermont Agency of Natural Resources
- 1.4 As used in this permit, the term "waste" means hazardous waste, non-hazardous waste and waste that is exempted or conditionally exempted from regulation under the VHWMR.
- 1.5 "Secretary" means the Secretary of the Vermont Agency of Natural Resources or his or her duly authorized representative. When implementing the provisions of **10 V. S. A. §§ 6608a and 6608b** relating to economic poisons and low-level radioactive wastes, the term Secretary includes the Secretary of Agriculture, Food & Markets and the Commissioner of Health.
- 1.6 "RCRA" means Resource Conservation and Recovery Act (RCRA) of 1976, (42 USC 6901 et seq.).

- 1.7 Unless otherwise specified, when reference is made to a specific subchapter, section or subsection of the VHWMR, the reference is to the VHWMR which became effective October 15, 2006.
- 1.8 **EVI** shall maintain compliance with the VHWMR as amended. **EVI** shall modify the permit according with **Condition 2.5** if an amendment to the VHWMR results in conflict between the permit and the amended VHWMR.
- 1.9 The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, such a determination shall not have any effect on the validity of the remainder of the permit, or on the application of the provision to other circumstances.
- 1.10 The permit does not convey any property rights of any sort, or any exclusive privilege.
- 1.11 This permit is not transferable to any person except after notice to the Secretary. The Secretary may require modification or revocation and reissuance of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under **40 CFR § 270.40**.
- 1.12 **EVI** shall comply with all applicable statutes, rules, and regulations of any federal, state, or local authority as may be amended. This permit shall not be a shield to the continued conformance to regulatory requirements. .
- 1.13 The Secretary may require EVI to establish and maintain an information repository at any time, based on the factors set forth in **40 § CFR 124.33(b)**. The information repository will be governed by the provisions in **40 CFR §§ 124.33(c) through (f)**.
- 1.14 All waste received by the EVI facility, including any hazardous waste, non-hazardous waste and waste that is exempted or conditionally exempted from regulation under the VHWMR, shall be managed according to the terms of this permit, as renewed and modified.
- 1.15 For all waste received by the EVI facility that is subject to the **VHWMR § 7-204(1)** “fuel-to-fuel” exemption EVI must:
 - (a) Evaluate the waste to verify that the waste contains “recoverable” fuel content (i.e., at least 1% fuel);
 - (b) Verify that waste information profiles associated with the waste identifies the potential fuel-to-fuel exempt status of the waste;
 - (c) Segregate the waste within the facility (or have an inventory system capable of identifying all fuel-to-fuel waste and its location within the facility);
 - (d) Mark containers to identify the “fuel-to-fuel exempt” status of the waste; and
 - (e) Maintain records that, at a minimum, contain the information required under VHWMR § 7-204(1)(3).

Section 2: Duration, Modification and Renewal of Permit

- 2.1 This permit shall be effective for 10 years from the date of signing.
- 2.2 If **EVI** wishes to continue an activity regulated by this permit after the expiration date of this permit, **EVI** must apply for and obtain a new permit.
- 2.3 **EVI** shall submit a new application at least 180 days before the expiration date of this permit, unless permission for a later date has been granted by the Secretary.
- 2.4 This permit and all conditions will remain in effect beyond the permit's expiration date, if **EVI** has submitted a timely, administratively complete application for a renewed permit, and, through no fault of **EVI**, the Secretary has not issued a new permit. Permits continued under this section remain fully effective and enforceable.
- 2.5 If any of the causes for modification found in **VHWMR §7-507(e)** apply, **EVI** shall seek a permit modification prior to making physical alterations or operational changes. Class I modifications for which prior approval is not required under **40 CFR § 270.42** may be implemented without prior notice or approval by the Secretary if notice of the modification is submitted to the Director within seven (7) calendar days after the change is put into effect.
- 2.6 This permit may be modified, revoked and reissued, or terminated for cause. The filing of a request by **EVI** for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

Section 3: Compliance and Enforcement

- 3.1 **EVI** shall allow the Secretary, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:
 - (a) Enter at reasonable times upon the **EVI** premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
 - (d) Sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by RCRA, any substances or parameters at any location.
- 3.2 **EVI** shall give advance notice to the Director of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. **EVI** may not treat, store, or dispose of hazardous waste in any modified portion of the facility except as provided in **40 CFR § 270.42**, until:

- (a) **EVI** has submitted to the Director by certified mail or hand delivery a letter signed by **EVI** and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and
 - (b) (i) The Director has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or
(ii) Within 15 days of the date of submission of the letter in paragraph (a) of this condition, **EVI** has not received notice from the Director of his or her intent to inspect, prior inspection is waived and **EVI** may commence treatment, storage, or disposal of hazardous waste.
- 3.3 Notwithstanding any other provisions of this permit, enforcement actions may be brought pursuant to **10 V.S.A. Chapters 159, 201, and 211**.
- 3.4 It shall not be a defense for **EVI** in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- 3.5 Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under 10 V.S.A. Chapters 159, 201, or 211, or Sections 3008(a), 3008(h), 3013, or 7003 of the Resource Conservation and Recovery Act (RCRA) of 1976, (42 USC 6901 et seq.) or § 106(a), 104 or 107 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980 (42 U.S.C. 9601 et seq.), or any other law providing for protection of public health or the environment.
- 3.6 In the event that the land on which the facility is located is transferred to a new owner, any actions or inactions of the land owner, or refusal by the land owner to provide access to **EVI** or the Secretary, shall not be a defense for **EVI** for any non-compliance with this permit or the VHWMR.

Section 4: Duties of the Permit Holder

- 4.1 **EVI** must comply with all conditions of this permit, except that **EVI** need not comply with the conditions of this permit to the extent and for the duration such noncompliance is authorized in an emergency permit. Any permit noncompliance, except under the terms of an emergency permit, constitutes a violation of the appropriate Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- 4.2 In the event of noncompliance with the permit, **EVI** shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment.
- 4.3 **EVI** shall furnish to the Secretary, within a reasonable time, any relevant information which the Secretary may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. **EVI** shall

also furnish to the Secretary, upon request, copies of records required to be kept by this permit.

- 4.4 **EVI** shall give notice to the Director as soon as possible of any planned physical alterations or additions to the permitted facility.
- 4.5 The Contingency Plan contained in **Appendix G** of this permit shall be reviewed and, if necessary amended, whenever:
 - (a) This permit is amended;
 - (b) The plan fails in an emergency;
 - (c) The facility changes (in its design, construction, operation, maintenance or other circumstances) in a way that materially increases the potential for fires, explosions, or the release of a hazardous waste or its constituents, or changes the response to an emergency;
 - (d) The list of emergency coordinators changes; or
 - (e) The list of emergency equipment changes.
- 4.6 **EVI** shall submit a copy of the Contingency Plan, and all amendments of that plan, to the local police department, fire department, hospital(s) and any other state or local emergency service provider(s) that may be called upon in the event of an emergency. A record of transmittal of the Contingency Plan to each service provider named above shall be maintained at the facility at all times.
- 4.7 **EVI** shall attempt to maintain emergency service arrangements with the state and local authorities specified in **Condition 4.6**. If any of these authorities decline to enter into such an arrangement, **EVI** must document this refusal in the facility operating record.
- 4.8 **EVI** shall retain copies of all reports required by the terms and conditions of this permit and records of all data used to complete its permit application for at least three (3) years from the date of the report or the submission of the application. This retention period and other retention periods required by the terms and conditions of this permit shall be automatically extended during the pendency of any unresolved enforcement action involving **EVI**.
- 4.9 **EVI** shall maintain a written operating record, either at the facility or at an alternative location approved by the Secretary, which includes all applicable requirements of **40 CFR § 264.73** and any additional requirements listed in **Appendix B** of this permit. The information contained in the written operating log shall be maintained, as it becomes available, in the operating record until facility closure is completed in accordance with **Section 9** of this permit.
- 4.10 **EVI** shall maintain the following personnel documents and records at the facility:
 - (a) A listing of the job title for each position at the facility related to hazardous waste management and the name of the employee filling that position;
 - (b) A written job description for each position listed above which includes the requisite skill, education, or other qualification, and duties of employees assigned to the position;

- (c) A written description of the employee training required for each position listed in **Appendix H** of this permit; and
 - (d) Records verifying that the employee training program contained in **Appendix H** of this permit has been presented to, and completed by, appropriate facility personnel.
- 4.11 Training records on current personnel shall be kept until facility closure is completed in accordance with **Section 9** of this permit. Training records on former employees shall be kept for at least three (3) years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the company.
- 4.12 **EVI** shall follow the waste analysis procedures contained in **Appendix C** of this permit.
- 4.13 Prior to accepting waste from a source, **EVI** shall follow the waste approval process described in the Waste Analysis Plan contained in **Appendix C** of this permit. At a minimum, the waste approval process shall identify for each waste all of the information necessary for shipment to, and acceptance by, an appropriate treatment, storage and disposal facility. In addition, the waste approval process shall be followed in the event that **EVI** is notified or has reason to believe that the process generating the waste has changed.
- 4.14 All sampling, monitoring, and/or analysis performed in relation to activities covered by this permit shall be performed according to the appropriate method specified in the edition of "Test Methods for Evaluating Solid Waste, SW-846, Standard Methods of Wastewater Analysis", or an equivalent method, such as those developed by the American Society for Testing and Materials (ASTM) incorporated in the VHWMR by reference or approved by EPA through rulemaking or by the Agency in writing.
- 4.15 **EVI** shall document the name(s), address(es), and telephone number(s) of any consultant(s) and/or laboratory(ies) retained by **EVI** to perform sampling, monitoring, and/or analysis required by the Waste Analysis Plan contained in **Appendix C** of this permit..
- 4.16 **EVI** shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, the certification required by **40 CFR § 264.73(b)(9)**, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the sample, measurement, report, certification, or application. This period may be extended by request of the Secretary at any time. **EVI** shall maintain records from all ground-water monitoring wells and associated ground-water surface elevations, for the active life of the facility, and for disposal facilities for the post-closure care period as well.

Records for monitoring information shall include:

- (a) The date, exact place, and time of sampling or measurements;
- (b) The individual(s) who performed the sampling or measurements;
- (c) The date(s) analyses were performed;
- (d) The individual(s) who performed the analyses;
- (e) The analytical techniques or methods used; and

- (f) The results of such analyses.
- 4.17 **EVI** shall submit to the Director, upon request, the results of all sampling and/or tests or other data generated pursuant to **Section 11** (Corrective Action) of this permit.
- 4.18 **EVI** shall provide written information regarding waste quantities, types, and locations at the facility, to state and local authorities (including SERCs and LEPCs) and first responders for the purpose of emergency preparedness and prevention, and to place a copy of this information in the facility's operating record, as well as to update such information as necessary, and provide the updates to state and local authorities and first responders. The written information shall also describe the layout of the facility, locations where personnel normally work, and entrances and possible evacuation routes.

Section 5: Facility Design and Operation

- 5.1 **EVI** shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by **EVI** to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.
- 5.2 **EVI** shall design, maintain and operate the facility in a manner which minimizes the possibility of a fire, explosion, or any unplanned, sudden or non-sudden release of a hazardous waste or hazardous waste constituents to air, soil, surface waters or groundwater which could threaten human health or the environment. At a minimum, **EVI** shall maintain and operate the facility in accordance with the preparedness and prevention procedures contained in **Appendix F** of this permit.
- 5.3 **EVI** shall immediately carry out the provisions of the Contingency Plan contained in **Appendix G** of this permit whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.
- 5.4 Spills, leaks, drips and other discharges which occur as a result of the storage, loading, transfer, or other handling of waste shall be immediately cleaned up and collected by appropriate means. Any spill debris generated from such events shall be managed in accordance with this permit and the VHWMR.
- 5.5 **EVI** shall inspect the facility for malfunctions and deterioration, operator errors, and discharges which may be causing, or may lead to, release of hazardous waste constituents to the environment, or a threat to human health. **EVI** shall conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment. At a minimum, **EVI** shall follow the facility inspection schedules contained in **Appendix F** of this permit.

- 5.6 **EVI** shall remedy any deterioration or malfunction of equipment or structures which the inspection reveals on a schedule which ensures that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action shall be taken immediately in accordance with the Contingency Plan contained in **Appendix G** of this permit.
- 5.7 Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.
- 5.8 Hazardous waste treatment, storage, or disposal activities other than those specified in this permit are prohibited.
- 5.9 **EVI** may receive from off-site, store and/or transfer for disposal only those hazardous wastes specified in **Appendix A** of this permit.
- 5.10 **EVI** shall store and/or transfer for disposal waste only in those areas specified in **Appendix D** of this permit.
- 5.11 The maximum quantity of waste that may be stored in the facility at any point in time is 2,353 55-gallon drums or its equivalent.
- 5.12 **EVI** shall maintain aisle space between rows of containerized wastes stored at the facility that is sufficient to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment. In no circumstance shall the aisle space be less than 24 inches wide.
- 5.13 **EVI** shall stack containerized wastes no greater than two high. When containers are stacked, the containers on the second tier must be palletized (e.g., placed on a pallet that typically measures 4' x 4') and secured with banding.
- 5.14 **EVI** shall manage all containerized and bulk liquid waste stored at the facility in accordance with the procedures contained in **Appendix D** of this permit.
- 5.15 **EVI** shall maintain at the facility the equipment identified listed **Appendix G** of this permit.
- 5.16 **EVI** shall prevent the unknowing entry of, and minimize the possibility for unauthorized entry of, persons or livestock onto any portion of the facility. **EVI** shall maintain security devices and warning signs in accordance with the Security Plan contained in **Appendix F** of this permit.
- 5.17 Any work plans developed for the purposes of closure, post-closure, or corrective action shall be approved by the Secretary prior to implementation.
- 5.18 **EVI** shall manage the two 1,000 gallon aboveground double-wall poly tanks in accordance with the procedures contained in **Appendix D** of this permit.

Section 6: Reporting Requirements

- 6.1 All applications, reports, or information submitted to the Director shall be signed and certified in accordance with **VHWMR § 7-108**.
- 6.2 All reports, notifications, and submissions required by this permit shall be sent by certified mail with shipment tracking and receipt documentation, or given to:
- Division Director, Waste Management Division
Vermont Agency of Natural Resources
103 South Main Street - West Building
Waterbury, Vermont 05671-0404*
- 6.3 Monitoring results shall be reported at the intervals specified elsewhere in this permit.
- 6.4 Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.
- 6.5 Reporting noncompliance.
- (a) **EVI** shall orally report any noncompliance which may endanger health or the environment immediately upon discovery of the noncompliance, including:
- (i) Information concerning release of any hazardous waste that may cause an endangerment to public drinking water supplies.
 - (ii) Any information of a release or discharge of hazardous waste or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility.
- (b) The description of the occurrence and its cause shall include:
- (i) Name, address, and telephone number of the owner or operator;
 - (ii) Name, address, and telephone number of the facility;
 - (iii) Date, time, and type of incident;
 - (iv) Name and quantity of material(s) involved;
 - (v) The extent of injuries, if any;
 - (vi) An assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable; and
 - (vii) Estimated quantity and disposition of recovered material that resulted from the incident.
- (c) A written submission shall also be provided within 5 days of the time **EVI** becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent

reoccurrence of the noncompliance. The Secretary may waive the five day written notice requirement in favor of a written report within fifteen days.

- 6.6 If a significant discrepancy in a manifest is discovered, **EVI** must attempt to reconcile the discrepancy. If not resolved within fifteen days, **EVI** must submit a letter report, including a copy of the manifest, to the Director.
- 6.7 An unmanifested waste report must be submitted to the Director within 15 days of receipt of unmanifested waste.
- 6.8 A biennial report must be submitted by March 1st of each even numbered year covering facility activities during the previous odd numbered calendar year. The biennial report shall be submitted electronically in file and data formats compatible with the BRState software.
- 6.9 **EVI** shall report all instances of noncompliance not reported under **conditions 6.3, 6.4, and 6.5** of this permit, at the time monitoring reports are submitted. The reports shall contain the information listed in **condition 6.5** of this permit.
- 6.10 Where **EVI** becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Director, it shall promptly submit such facts or information.

Section 7: Waste Transport

- 7.1 **EVI** shall comply with the manifest requirements of VHWMR Subchapter 7.
- 7.2 Any hazardous waste removed from the facility shall be transported by a Vermont-permitted hazardous waste transporter, in accordance with 10 V.S.A. § 6607a and the VHWMR, to an appropriate facility.
- 7.3 **EVI** shall not accept any shipment of hazardous waste which is not accompanied by a manifest, unless the waste is both generated and delivered by a conditionally exempt generator who is exempt from the manifest requirements pursuant to **VHWMR Section 7-306(c)(3)**.
- 7.4 **EVI** shall notify the Director and the EPA Region I RCRA Import/Export Coordinator, in writing, at least four weeks in advance of the date **EVI** expects to receive hazardous waste from a non-U.S. source, as required by **40 CFR § 264.12(a)** and **VHWMR § 7-706**. Notice of subsequent shipments of the same waste from the same foreign source in the same calendar year is not required.

Section 8: Personnel Training

- 8.1 All **EVI** personnel involved in the handling of hazardous waste shall successfully complete a program of classroom instruction or on-the-job training that prepares them to perform their

hazardous waste management duties. This introductory training shall be conducted in accordance with the Training Plan contained in **Appendix H** of this permit.

- 8.2 All **EVI** personnel shall complete their introductory training within six (6) months after the date of their employment at the facility. An employee may not work in an unsupervised position until completing the introductory training program.
- 8.3 All **EVI** personnel involved in the handling of hazardous waste shall take part in an annual training program which includes a review of the introductory training program. This annual training shall be conducted in accordance with the Training Plan contained in **Appendix H** of this permit.

Section 9: Facility Closure

- 9.1 **EVI** shall close the facility in a manner that eliminates threats to human health or the environment due to the post-closure escape of a hazardous waste or its constituents, directly or through leachate or surface run-off, or the escape of waste decomposition products to the ground or surface waters or ambient air. At a minimum, closure shall be conducted in accordance with the Closure Plan contained in **Appendix I** of this permit. The Closure Plan shall be amended whenever changes in operations or facility design affect the plan or when there is a change in the expected year of closure.
- 9.2 **EVI** shall maintain a written estimate of the cost of closing the facility and shall amend that estimate whenever there is an amendment to the existing Closure Plan contained in **Appendix I** of this permit. Any amended closure cost estimate shall be equal to the cost of closing the facility at the point in the facility's operating life when the extent and manner of its operation would make closure the most expensive, as indicated in the Closure Plan.
- 9.3 **EVI** shall annually adjust the closure cost estimate for inflation according to applicable requirements of **40 CFR 264.142(b)**.
- 9.4 **EVI** shall notify the Director in writing of its intent to close the facility at least six (6) months prior to the date on which it expects to begin final closure.
- 9.5 Within three (3) months after receiving the final volume of hazardous waste, **EVI** shall remove all waste from the facility in accordance with the Closure Plan contained in **Appendix I** of this permit. Within six (6) months after receiving the final volume of waste at the facility, **EVI** shall complete all closure activities in accordance with the Closure Plan.
- 9.6 Facility closure shall not be considered to have been completed until:
 - (a) **EVI** and an independent Vermont-licensed professional engineer have provided written certification that the closure has been completed in accordance with the provisions of the Closure Plan; and
 - (b) The Secretary has inspected the facility;
 - (c) The Secretary has given written approval of the closure.

Section 10: Financial Requirements

- 10.1 **EVI** shall maintain liability coverage for claims arising from sudden accidental occurrences, which occur as a result of the operations of the facility, that cause injury to persons and property in an amount of at least one million dollars (\$1,000,000) per occurrence with an annual aggregate of at least two million dollars (\$2,000,000) until closure of the facility has been completed. This liability coverage must be equivalent to the coverage held by **EVI** at the time of issuance of this permit, as evidenced by the documents included in **Appendix I** of this permit.
- 10.2 **EVI** shall demonstrate liability coverage for claims arising from sudden accidental occurrences in the amount of at least \$1 million per occurrence, with an annual aggregate of at least \$2 million, exclusive of legal defense costs. This liability coverage shall be demonstrated using one of the financial assurance instruments specified in **40 CFR 264.147(a)**. Documentation of proof of insurance shall be included in **Appendix I** of this permit.
- 10.3 **EVI** shall establish financial assurance as required by **40 CFR 264.143**. Financial assurance shall be in at least the amount required by **Conditions 9.2 and 9.3** of this permit.
- 10.4 **EVI** shall maintain financial assurance for closure of the facility until closure has been certified in accordance with **40 CFR 264.115** and the Director approves the release of the financial instrument in accordance with **40 CFR 241.143(i)**.
- 10.5 Any changes in the financial assurance mechanism must be approved by the Secretary.
- 10.6 **EVI** must notify the Director by certified mail of the commencement of any voluntary or involuntary proceeding under the United States Bankruptcy Code (Title 11, U.S. Code), naming the owner or operator as debtor, within 10 days after commencement of the proceeding.
- 10.7 In the event of the bankruptcy of or suspension of issuing authority of the trust fund trustee or trustee institution issuing any surety bond, letter of credit or insurance policy required by this permit, **EVI** must establish other financial assurance or liability coverage within 60 days after the event and in accordance with **Condition 10.5** of this permit.

Section 11: Corrective Action

- 11.1 If **EVI** determines that hazardous waste or hazardous materials have been released to the environment at the facility or that there is a likelihood of a release of hazardous waste or hazardous materials to the environment, then **EVI** shall immediately notify the Director of any such release, and comply with the applicable requirements of the **VHWMR § 7-105**.
- 11.2 In the event of a release at the facility, **EVI** shall report the release to the Director and conduct an assessment of the release in accordance with **VHWMR § 7-105**. Information submitted must be sufficient to determine whether further investigation is necessary.

- 11.3 Corrective action may be required beyond the facility's boundary if the Secretary determines that it is necessary to protect human health and the environment.

APPENDICES

APPENDIX A	PART A APPLICATION
APPENDIX B	FACILITY DESCRIPTION
APPENDIX C	WASTE ANALYSIS PLAN
APPENDIX D	PROCESS INFORMATION
APPENDIX E	GROUNDWATER MONITORING
APPENDIX F	PROCEDURES TO PREVENT HAZARDS
APPENDIX G	CONTINGENCY PLAN
APPENDIX H	PERSONNEL TRAINING PLAN
APPENDIX I	CLOSURE PLAN AND FINANCIAL ASSURANCE
APPENDIX J	CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS
APPENDIX K	SUBPART BB AND CC STANDARDS
APPENDIX L	EVI Letter Dated January 12, 2010 Regarding Withdrawal of the EVI Solid Waste Certification Application

PART A APPLICATION

ENPRO Services of Vermont, Inc.
54 Avenue D
Williston, Vermont 05495

VTR000517052

<p>MAIL THE COMPLETED FORM TO: The Appropriate EPA Regional or State Office.</p>	<p>United State Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM</p>		
<p>1. Reason for Submittal (See instructions on page 25)</p>	<p>Reason for Submittal:</p> <p><input type="checkbox"/> To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities.)</p> <p><input type="checkbox"/> To provide subsequent notification (to update site identification information)</p> <p><input type="checkbox"/> As a component of First RCRA Hazardous Waste Part A Permit Application.</p> <p><input checked="" type="checkbox"/> As a component of Revised RCRA Hazardous Waste Part A Permit Application (1999 Permit Renewal Application, Revision I, April 2007)</p> <p><input type="checkbox"/> As a component of the Hazardous Waste Report.</p>		
<p>2. Site EPA ID Number (See instructions on page 26)</p>	<p>EPA ID Number: VTR000517052</p>		
<p>3. Site Name (See instruction on page 26)</p>	<p>Name: ENPRO SERVICES OF VERMONT, INC.</p>		
<p>4. Site Location Information (See instructions on page 26)</p>	<p>Street Address: 54 AVENUE D</p>		
	<p>City, Town, or Village: WILLISTON</p>	<p>State: VERMONT</p>	
	<p>County Name: CHITTENDEN</p>	<p>Zip Code: 05495</p>	
<p>5. Site Land Type (See instructions on page 26)</p>	<p>Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>		
<p>6. North American Industry Classification System (NAICS) Code(s) for the Site (See instructions on page 26)</p>	<p>A. 562211</p>		<p>B.</p>
	<p>C.</p>		<p>D.</p>
<p>7. Site Mailing Address (See instruction on page 27)</p>	<p>Street or P.O. Box: 54 AVENUE D</p>		
	<p>City, Town, or Village: WILLISTON</p>		
	<p>State: VERMONT</p>		
	<p>Country: USA</p>	<p>Zip Code: 05495</p>	
<p>8. Site contact Person (See instructions on page 27)</p>	<p>First Name: Jeff</p>	<p>MI:</p>	<p>Last Name: Baker</p>
	<p>Phone Number: 802-860-1200</p>		<p>Phone Number Extension:</p>
<p>9. Legal Owner and Operator of the Site (See instructions on pages 27 and 28)</p>	<p>A. Name of Site's Legal Owner: DAC III, LLC</p>		<p>Date Became Owner (mm/dd/yyyy) 12/04/2007</p>
	<p>Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>		
	<p>Name of Site's Operator: ENPRO SERVICES OF VERMONT, INC.</p>		<p>Date Became Operator (mm/dd/yyyy) 08/20/2007</p>
	<p>Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>		

10. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. See instructions on page 28 to 32)

A. Hazardous Waste Activities

1. Generator of Hazardous Waste

(choose only one of the following three categories)

- a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.) of non-acute hazardous waste; or
- b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.) of non-acute hazardous waste; or
- c. CESQG: Less than 100 kg/mo (220 lbs./mo.) of non-acute hazardous waste

In addition, indicate other generator activities (check all that apply)

- d. United States Importer of Hazardous Waste
- e. Mixed Waste (hazardous and radioactive) Generator

For items 2 through 6, check all that apply:

- 2. Transporter of Hazardous Waste**
- 3. Treater, Storer, or Disposer of Hazardous Waste (at your site)** Note: A hazardous waste permit is required for this activity.
- 4. Recycler of Hazardous Waste (at your site)** Note: A hazardous waste permit may be required for this activity.
- 5. Exempt Boiler and/or Industrial Furnace**
 - a. Small Quantity On-site Burner Exemption
 - b. Smelting, Melting, and Refining Furnace Exemption
- 6. Underground Injection Control**

B. Universal Waste Activities

1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste generated and/or accumulated at your site. (check all boxes that apply):

		Generated	Accumulated
a. Batteries		<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Pesticides		<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Thermostats		<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Lamps		<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Other (specify)	Mercury Devices	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Other (specify)	PCB	<input type="checkbox"/>	<input type="checkbox"/>
	Lamp Ballast	<input type="checkbox"/>	<input type="checkbox"/>
g. Other (specify)	CRTs	<input type="checkbox"/>	<input type="checkbox"/>

2. Destination Facility for Universal Waste

Note: A hazardous waste permit may be required for this activity

C. Used Oil Activities

- 1. Used Oil Transporter – Indicate Type(s) of Activity(ies)
 - a. Transporter
 - b. Transfer Facility
- 2. Used Oil Processor and/or Re-refiner – Indicate Type(s) of Activity(ies)
 - a. Processor
 - b. Re-refiner
- 3. Off-Specification Used Oil Burner
- 4. Used Oil Fuel Marketer – Indicate Type(s) of Activity(ies)
 - a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
 - b. Marketer Who First Claims the Used Oil Meets the Specifications

11. Description of Hazardous Wastes (See instructions on page 33)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

See Part A included.						

United State Environmental Protection Agency
HAZARDOUS WASTE PERMIT INFORMATION FORM

1. (See instructions on page 35)	First Name: David	MI: A.	Last Name: Cowie
	Phone Number: 802-860-1200		Phone Number Extension:
2. Facility Permit Contact Mailing Address (See instruction on page 35)	Street or P.O. Box: 54 AVENUE D		
	City, Town, or Village: WILLISTON		
	State: VERMONT		
	Country: USA	Zip Code: 05495	
3. Legal Owner Mailing Address and Telephone Number (See instruction on page 36)	Street or P.O. Box: 599 Avenue D		
	City, Town, or Village: WILLISTON		
	State: VERMONT		
	Country: USA	Zip Code: 05495	Phone Number 802-864-5830
4. Operator Mailing Address and Telephone Number (See instruction on page 36)	Street or P.O. Box: 54 AVENUE D		
	City, Town, or Village: WILLISTON		
	State: VT		
	Country: USA	Zip Code: 05495	Phone Number (802) 860-1200
5. Facility Existence Date (See instructions on page 36)	Facility Existence Date (mm/dd/yyyy) 1989		

6. Other Environmental Permits (See instructions page 36)

A. Permit Type (Enter Code)	B. Permit Number												C. Description
R	V	T	R	0	0	0	5	1	7	0	5	2	VERMONT-ISSUED – EFFECTIVE 08/20/2007

7. Nature of Business (Provide a brief description; see instructions on page 37)

ENPRO Services of Vermont, Inc. is a container and tank storage facility for hazardous, Vermont-regulated, and non-hazardous solid wastes.

8. Process Codes and Design Capacities (See instructions on page 37)

- (2) PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in item 9.
- (2) PROCESS DESIGN CAPACITY – For each code entered in column A, enter the capacity of the process.
- (2) AMOUNT – Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
- (2) UNIT OF MEASURE – For each amount entered in column B(1), enter the code in column B(2) from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

C. PROCESS TOTAL NUMBER OF UNITS – Enter the total number of units used with the corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	<u>Disposal:</u>				
D79	Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day	T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
D80	Landfill	Acre-feet; Hectare-meter; Acres; Cubic Meters; Hectares; Cubic Yards	T82	Lime Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
D81	Land Treatment	Acres or Hectares	T83	Aggregate Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T84	Phosphate Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards	T85	Coke Oven	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
D99	Other Disposal	Any Unit of measure Listed Below	T86	Blast Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S01	<u>Storage:</u> Container	Gallons; Liters; Cubic Meters or Cubic Yards	T87	Smelting, Melting or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S02	Tank Storage	Cubic Meters or Cubic Yards	T88	Titanium Dioxide Chloride Oxidation Reactor	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S03	Waste Pile	Cubic Yards or Cubic Meters	T89	Methane Reforming Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S04	Surface Impoundment Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T90	Pulping Liquor Recovery Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S05	Drip Pad	Gallons; Liters; Acres; Cubic Meters; Hectares; or Cubic Yards	T91	Combustion Device The Recovery of Sulfur Values From Spent Sulfuric Acid	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S06	Containment Building Storage	Cubic Yards or Cubic Meters	T92	Halogen Acid Furnaces	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S99	Other Storage	Any Unit of Measure Listed below	T93	Other Industrial Furnaces Listed in 40CFR §260.10	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
T01	<u>Treatment:</u> Tank Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour	T94	Containment Building-Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
T02	Surface Impoundment Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour	X01	<u>Miscellaneous (Subpart X):</u> Open Burning/Open Detonation Mechanical Processing	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour	X02		Thermal Unit
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Day; Liters Per Hour; or Million Btu Per Hour	X03	Geologic Repository	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per hour
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; Btu per Hour; or Million Btu Per Hour	X04	Other Subpart X	Short Tons Per Day; Btu Per Hour; or Million Btu Per hour
			X99		Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
					Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons.....	G	Short Tons Per Hour.....	D	Cubic Yards.....	Y
Gallons Per Hour.....	E	Metric Tons Per Hour.....	W	Cubic Meters.....	C
Gallons Per Day.....	U	Short Tons Per Day.....	N	Acre.....	B
Liters.....	L	Metric Tons Per Day.....	S	Acre-feet.....	A
Liters Per Hour.....	H	Pounds Per Hour.....	J	Hectares.....	Q
Liters Per Day.....	V	Kilograms Per Hour.....	R	Hectares – meter.....	F
		Million Btu Per Hour.....	X	Btu Per Hour.....	I

10. Description of Hazardous Wastes (See instructions on page 37)

- (2) EPA HAZARDOUS WASTE NUMBER – Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- (2) ESTIMATED ANNUAL QUANTITY – For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE – For each quantity entered in column B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

(2) PROCESSES

(2) . PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

- (2) Enter the first two as described above.
- (2) Enter "000" in the extreme right box of item XIV-D(1).
- (2) Use additional sheet, enter line number from previous sheet, and enter additional code(s) in item XIV-E.

- (2) .PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in item 10.D(2) or in Item 10.E(2).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- (2) Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and /or dispose of the waste.
- (2) In column A of the next line, enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- (2) Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	(2) EPA HAZAR D WAST E NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESS												
				(1) PROCESS CODES (Enter code)										(2) PROCESS DESCRIPTION (If a code is not entered in D(1))		
X 1	K 0 5 4	900	P	T	0	3	D	8	0							
X 2	D 0 0 2	400	P	T	0	3	D	8	0							
X 3	D 0 0 1	100	P	T	0	3	D	8	0							
X 4	D 0 0 2															Included with above

10. Description of Hazardous Wastes (Continued; use additional sheets as necessary)													
Line Number	A. EPA Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity of Waste	C. UNIT OF MEASURE (Enter Code)	D. PROCESSES									(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
				(1) PROCESS CODES (Enter code)									
1	D001	560,000	G	S	0	1							
2	D002	570,000	G	S	0	1							
3	D003	93,000	G	S	0	1							
4	D004	377,000	G	S	0	1							
5	D005	475,000	G	S	0	1							
6	D006	464,000	G	S	0	1							
7	D007	568,000	G	S	0	1							
8	D008	561,000	G	S	0	1							
9	D009	90,000	G	S	0	1							
10	D010	190,000	G	S	0	1							
11	D011	565,000	G	S	0	1							
12	D012	458,000	G	S	0	1							
13	D013	458,000	G	S	0	1							
14	D014	458,000	G	S	0	1							
15	D015	458,000	G	S	0	1							
16	D016	89,000	G	S	0	1							
17	D017	458,000	G	S	0	1							
18	D018	187,000	G	S	0	1							
19	D019	89,000	G	S	0	1							
20	D020	458,000	G	S	0	1							
21	D021	187,000	G	S	0	1							
22	D022	89,000	G	S	0	1							
23	D023	395,000	G	S	0	1							
24	D024	458,000	G	S	0	1							
25	D025	89,000	G	S	0	1							
26	D026	458,000	G	S	0	1							
27	D027	458,000	G	S	0	1							
28	D028	556,000	G	S	0	1							
29	D029	458,000	G	S	0	1							
30	D030	458,000	G	S	0	1							
31	D031	458,000	G	S	0	1							
32	D032	458,000	G	S	0	1							
33	D033	458,000	G	S	0	1							

10. Description of Hazardous Wastes (Continued; Additional Sheet)														
Line Number	A. EPA Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity of Waste	C. UNIT OF MEASURE (Enter Code)	D. PROCESSES										(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
				(1) PROCESS CODES (Enter code)										
34	D034	458,000	G	S	0	1								
35	D035	556,000	G	S	0	1								
36	D036	556,000	G	S	0	1								
37	D037	458,000	G	S	0	1								
38	D038	556,000	G	S	0	1								
39	D039	556,000	G	S	0	1								
40	D040	556,000	G	S	0	1								
41	D041	458,000	G	S	0	1								
42	D042	458,000	G	S	0	1								
43	D043	458,000	G	S	0	1								
44	F001	456,000	G	S	0	1								
45	F002	556,000	G	S	0	1								
46	F003	556,000	G	S	0	1								
47	F004	89,000	G	S	0	1								
48	F005	556,000	G	S	0	1								
49	F006	185,000	G	S	0	1								
50	F007	93,000	G	S	0	1								
51	F008	6,000	G	S	0	1								
52	F009	6,000	G	S	0	1								
53	F010	6,000	G	S	0	1								
54	F011	6,000	G	S	0	1								
55	F012	6,000	G	S	0	1								
56	F019	6,000	G	S	0	1								
57	F020	6,000	G	S	0	1								
58	F021	6,000	G	S	0	1								
59	F022	6,000	G	S	0	1								
60	F023	6,000	G	S	0	1								
61	F024	6,000	G	S	0	1								
62	F025	6,000	G	S	0	1								
63	F026	6,000	G	S	0	1								
64	F027	6,000	G	S	0	1								
65	F028	6,000	G	S	0	1								
66	F032	6,000	G	S	0	1								
67	F034	55,000	G	S	0	1								

10. Description of Hazardous Wastes (Continued; Additional Sheet)												
Line Number	A. EPA Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity of Waste	C. UNIT OF MEASURE (Enter Code)	D. PROCESSES								(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
				(1) PROCESS CODES (Enter code)								
68	F035	87,000	G	S	0	1						
69	F037	6,000	G	S	0	1						
70	F038	6,000	G	S	0	1						
71	F039	6,000	G	S	0	1						
72	K001	6,000	G	S	0	1						
73	K002	6,000	G	S	0	1						
74	K003	6,000	G	S	0	1						
75	K004	6,000	G	S	0	1						
76	K005	6,000	G	S	0	1						
77	K006	6,000	G	S	0	1						
78	K007	6,000	G	S	0	1						
79	K008	6,000	G	S	0	1						
80	K009	6,000	G	S	0	1						
81	K010	6,000	G	S	0	1						
82	K011	6,000	G	S	0	1						
83	K013	6,000	G	S	0	1						
84	K014	6,000	G	S	0	1						
85	K015	6,000	G	S	0	1						
86	K016	6,000	G	S	0	1						
87	K017	6,000	G	S	0	1						
88	K018	6,000	G	S	0	1						
89	K019	6,000	G	S	0	1						
90	K020	6,000	G	S	0	1						
91	K021	6,000	G	S	0	1						
92	K022	6,000	G	S	0	1						
93	K023	6,000	G	S	0	1						
94	K024	6,000	G	S	0	1						
95	K025	6,000	G	S	0	1						
96	K026	6,000	G	S	0	1						
97	K027	6,000	G	S	0	1						
98	K028	6,000	G	S	0	1						
99	K029	6,000	G	S	0	1						
100	K030	6,000	G	S	0	1						
101	K031	6,000	G	S	0	1						
102	K032	6,000	G	S	0	1						

10. Description of Hazardous Wastes (Continued; Additional Sheet)													
Line Number	A. EPA Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity of Waste	C. UNIT OF MEASURE (Enter Code)	D. PROCESSES									(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
				(1) PROCESS CODES (Enter code)									
103	K033	6,000	G	S	0	1							
104	K034	6,000	G	S	0	1							
105	K035	6,000	G	S	0	1							
106	K036	6,000	G	S	0	1							
107	K037	6,000	G	S	0	1							
108	K038	6,000	G	S	0	1							
109	K039	6,000	G	S	0	1							
110	K040	6,000	G	S	0	1							
111	K041	6,000	G	S	0	1							
112	K042	6,000	G	S	0	1							
113	K043	6,000	G	S	0	1							
114	K044	6,000	G	S	0	1							
115	K045	6,000	G	S	0	1							
116	K046	6,000	G	S	0	1							
117	K047	6,000	G	S	0	1							
118	K048	6,000	G	S	0	1							
119	K049	6,000	G	S	0	1							
120	K050	6,000	G	S	0	1							
121	K051	6,000	G	S	0	1							
122	K052	6,000	G	S	0	1							
123	K060	6,000	G	S	0	1							
124	K061	6,000	G	S	0	1							
125	K062	6,000	G	S	0	1							
126	K069	6,000	G	S	0	1							
127	K071	6,000	G	S	0	1							
128	K073	6,000	G	S	0	1							
129	K083	6,000	G	S	0	1							
130	K084	6,000	G	S	0	1							
131	K085	6,000	G	S	0	1							
132	K086	6,000	G	S	0	1							
133	K087	6,000	G	S	0	1							
134	K088	6,000	G	S	0	1							
135	K093	6,000	G	S	0	1							
136	K094	6,000	G	S	0	1							
137	K095	6,000	G	S	0	1							

10. Description of Hazardous Wastes (Continued; Additional Sheet)													
Line Number	A. EPA Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity of Waste	C. UNIT OF MEASURE (Enter Code)	D. PROCESSES									(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
				(1) PROCESS CODES (Enter code)									
138	K096	6,000	G	S	0	1							
139	K097	6,000	G	S	0	1							
140	K098	6,000	G	S	0	1							
141	K099	6,000	G	S	0	1							
142	K100	6,000	G	S	0	1							
143	K101	6,000	G	S	0	1							
144	K102	6,000	G	S	0	1							
145	K103	6,000	G	S	0	1							
146	K104	6,000	G	S	0	1							
147	K105	6,000	G	S	0	1							
148	K106	6,000	G	S	0	1							
149	K107	6,000	G	S	0	1							
150	K108	6,000	G	S	0	1							
151	K109	6,000	G	S	0	1							
152	K110	6,000	G	S	0	1							
153	K111	6,000	G	S	0	1							
154	K112	6,000	G	S	0	1							
155	K113	6,000	G	S	0	1							
156	K114	6,000	G	S	0	1							
157	K115	6,000	G	S	0	1							
158	K116	6,000	G	S	0	1							
159	K117	6,000	G	S	0	1							
160	K118	6,000	G	S	0	1							
161	K123	6,000	G	S	0	1							
162	K124	6,000	G	S	0	1							
163	K125	6,000	G	S	0	1							
164	K126	6,000	G	S	0	1							
165	K131	6,000	G	S	0	1							
166	K132	6,000	G	S	0	1							
167	K136	6,000	G	S	0	1							
168	K140	6,000	G	S	0	1							
169	K141	6,000	G	S	0	1							
170	K142	6,000	G	S	0	1							
171	K143	6,000	G	S	0	1							
172	K144	6,000	G	S	0	1							

10. Description of Hazardous Wastes (Continued; Additional Sheet)													
Line Number	A. EPA Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity of Waste	C. UNIT OF MEASURE (Enter Code)	D. PROCESSES									(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
				(1) PROCESS CODES (Enter code)									
173	K145	6,000	G	S	0	1							
174	K147	6,000	G	S	0	1							
175	K148	6,000	G	S	0	1							
176	K149	6,000	G	S	0	1							
177	K150	6,000	G	S	0	1							
178	K151	6,000	G	S	0	1							
179	K156	6,000	G	S	0	1							
180	K157	6,000	G	S	0	1							
181	K158	6,000	G	S	0	1							
182	K159	6,000	G	S	0	1							
183	K160	6,000	G	S	0	1							
184	K161	6,000	G	S	0	1							
185	K169	6,000	G	S	0	1							
186	K170	6,000	G	S	0	1							
187	K171	6,000	G	S	0	1							
188	K172	6,000	G	S	0	1							
189	P001	6,000	G	S	0	1							
190	P002	6,000	G	S	0	1							
191	P003	6,000	G	S	0	1							
192	P004	6,000	G	S	0	1							
193	P005	6,000	G	S	0	1							
194	P006	6,000	G	S	0	1							
195	P007	6,000	G	S	0	1							
196	P008	6,000	G	S	0	1							
197	P009	6,000	G	S	0	1							
198	P010	6,000	G	S	0	1							
199	P011	6,000	G	S	0	1							
200	P012	6,000	G	S	0	1							
201	P013	6,000	G	S	0	1							
202	P014	6,000	G	S	0	1							
203	P015	6,000	G	S	0	1							
204	P016	6,000	G	S	0	1							
205	P017	6,000	G	S	0	1							
206	P018	6,000	G	S	0	1							
207	P020	6,000	G	S	0	1							

10. Description of Hazardous Wastes (Continued; Additional Sheet)														
Line Number	A. EPA Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity of Waste	C. UNIT OF MEASURE (Enter Code)	D. PROCESSES										(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
				(1) PROCESS CODES (Enter code)										
208	P021	6,000	G	S	0	1								
209	P022	6,000	G	S	0	1								
210	P023	6,000	G	S	0	1								
211	P024	6,000	G	S	0	1								
212	P026	6,000	G	S	0	1								
213	P027	6,000	G	S	0	1								
214	P028	6,000	G	S	0	1								
215	P029	6,000	G	S	0	1								
216	P030	6,000	G	S	0	1								
217	P031	6,000	G	S	0	1								
218	P033	6,000	G	S	0	1								
219	P034	6,000	G	S	0	1								
220	P036	6,000	G	S	0	1								
221	P037	6,000	G	S	0	1								
222	P038	6,000	G	S	0	1								
223	P039	6,000	G	S	0	1								
224	P040	6,000	G	S	0	1								
225	P041	6,000	G	S	0	1								
226	P042	6,000	G	S	0	1								
227	P043	6,000	G	S	0	1								
228	P044	6,000	G	S	0	1								
229	P045	6,000	G	S	0	1								
230	P046	6,000	G	S	0	1								
231	P047	6,000	G	S	0	1								
232	P048	6,000	G	S	0	1								
233	P049	6,000	G	S	0	1								
234	P050	6,000	G	S	0	1								
235	P051	6,000	G	S	0	1								
236	P054	6,000	G	S	0	1								
237	P056	6,000	G	S	0	1								
238	P057	6,000	G	S	0	1								
239	P058	6,000	G	S	0	1								
240	P059	6,000	G	S	0	1								
241	P060	6,000	G	S	0	1								
242	P062	6,000	G	S	0	1								

10. Description of Hazardous Wastes (Continued; Additional Sheet)													
Line Number	A. EPA Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity of Waste	C. UNIT OF MEASURE (Enter Code)	D. PROCESSES									(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
				(1) PROCESS CODES (Enter code)									
243	P063	6,000	G	S	0	1							
244	P064	6,000	G	S	0	1							
245	P065	6,000	G	S	0	1							
246	P066	6,000	G	S	0	1							
247	P067	6,000	G	S	0	1							
248	P068	6,000	G	S	0	1							
249	P069	6,000	G	S	0	1							
250	P070	6,000	G	S	0	1							
251	P071	6,000	G	S	0	1							
252	P072	6,000	G	S	0	1							
253	P073	6,000	G	S	0	1							
254	P074	6,000	G	S	0	1							
255	P075	6,000	G	S	0	1							
256	P076	6,000	G	S	0	1							
257	P077	6,000	G	S	0	1							
258	P078	6,000	G	S	0	1							
259	P081	6,000	G	S	0	1							
260	P082	6,000	G	S	0	1							
261	P084	6,000	G	S	0	1							
262	P085	6,000	G	S	0	1							
263	P087	6,000	G	S	0	1							
264	P088	6,000	G	S	0	1							
265	P089	6,000	G	S	0	1							
266	P092	6,000	G	S	0	1							
267	P093	6,000	G	S	0	1							
268	P094	6,000	G	S	0	1							
269	P095	6,000	G	S	0	1							
270	P096	6,000	G	S	0	1							
271	P097	6,000	G	S	0	1							
272	P098	6,000	G	S	0	1							
273	P099	6,000	G	S	0	1							
274	P101	6,000	G	S	0	1							
275	P102	6,000	G	S	0	1							
276	P103	6,000	G	S	0	1							
277	P104	6,000	G	S	0	1							

10. Description of Hazardous Wastes (Continued; Additional Sheet)													
Line Number	A. EPA Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity of Waste	C. UNIT OF MEASURE (Enter Code)	D. PROCESSES									(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
				(1) PROCESS CODES (Enter code)									
278	P105	6,000	G	S	0	1							
279	P106	6,000	G	S	0	1							
280	P107	6,000	G	S	0	1							
281	P108	6,000	G	S	0	1							
282	P109	6,000	G	S	0	1							
283	P110	6,000	G	S	0	1							
284	P111	6,000	G	S	0	1							
285	P112	6,000	G	S	0	1							
286	P113	6,000	G	S	0	1							
287	P114	6,000	G	S	0	1							
288	P115	6,000	G	S	0	1							
289	P116	6,000	G	S	0	1							
290	P118	6,000	G	S	0	1							
291	P119	6,000	G	S	0	1							
292	P120	6,000	G	S	0	1							
293	P121	6,000	G	S	0	1							
294	P122	6,000	G	S	0	1							
295	P123	6,000	G	S	0	1							
296	P127	6,000	G	S	0	1							
297	P128	6,000	G	S	0	1							
298	P185	6,000	G	S	0	1							
299	P188	6,000	G	S	0	1							
300	P189	6,000	G	S	0	1							
301	P190	6,000	G	S	0	1							
302	P191	6,000	G	S	0	1							
303	P192	6,000	G	S	0	1							
304	P194	6,000	G	S	0	1							
305	P196	6,000	G	S	0	1							
306	P197	6,000	G	S	0	1							
307	P198	6,000	G	S	0	1							
308	P199	6,000	G	S	0	1							
309	P201	6,000	G	S	0	1							
310	P202	6,000	G	S	0	1							
311	P203	6,000	G	S	0	1							
312	P204	6,000	G	S	0	1							

10. Description of Hazardous Wastes (Continued; Additional Sheet)												
Line Number	A. EPA Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity of Waste	C. UNIT OF MEASURE (Enter Code)	D. PROCESSES								(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
				(1) PROCESS CODES (Enter code)								
313	P205	6,000	G	S	0	1						
314	U001	369,000	G	S	0	1						
315	U002	369,000	G	S	0	1						
316	U003	6,000	G	S	0	1						
317	U004	6,000	G	S	0	1						
318	U005	6,000	G	S	0	1						
319	U006	6,000	G	S	0	1						
320	U007	6,000	G	S	0	1						
321	U008	6,000	G	S	0	1						
322	U009	6,000	G	S	0	1						
323	U010	6,000	G	S	0	1						
324	U011	6,000	G	S	0	1						
325	U012	87,000	G	S	0	1						
326	U014	6,000	G	S	0	1						
327	U015	6,000	G	S	0	1						
328	U016	6,000	G	S	0	1						
329	U017	6,000	G	S	0	1						
330	U018	6,000	G	S	0	1						
331	U019	6,000	G	S	0	1						
332	U020	6,000	G	S	0	1						
333	U021	87,000	G	S	0	1						
334	U022	6,000	G	S	0	1						
335	U023	6,000	G	S	0	1						
336	U024	6,000	G	S	0	1						
337	U025	6,000	G	S	0	1						
338	U026	6,000	G	S	0	1						
339	U027	6,000	G	S	0	1						
340	U028	6,000	G	S	0	1						
341	U029	6,000	G	S	0	1						
342	U030	6,000	G	S	0	1						
343	U031	372,000	G	S	0	1						
344	U032	6,000	G	S	0	1						
345	U033	6,000	G	S	0	1						
346	U034	6,000	G	S	0	1						
347	U035	6,000	G	S	0	1						

10. Description of Hazardous Wastes (Continued; Additional Sheet)													
Line Number	A. EPA Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity of Waste	C. UNIT OF MEASURE (Enter Code)	D. PROCESSES									(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
				(1) PROCESS CODES (Enter code)									
348	U036	6,000	G	S	0	1							
349	U037	6,000	G	S	0	1							
350	U038	6,000	G	S	0	1							
351	U039	6,000	G	S	0	1							
352	U041	6,000	G	S	0	1							
353	U042	6,000	G	S	0	1							
354	U043	6,000	G	S	0	1							
355	U044	6,000	G	S	0	1							
356	U045	6,000	G	S	0	1							
357	U046	6,000	G	S	0	1							
358	U047	6,000	G	S	0	1							
359	U048	6,000	G	S	0	1							
360	U049	6,000	G	S	0	1							
361	U050	6,000	G	S	0	1							
362	U051	6,000	G	S	0	1							
363	U052	6,000	G	S	0	1							
364	U053	6,000	G	S	0	1							
365	U055	6,000	G	S	0	1							
366	U056	3,000	G	S	0	1							
367	U057	6,000	G	S	0	1							
368	U058	6,000	G	S	0	1							
369	U059	6,000	G	S	0	1							
370	U060	6,000	G	S	0	1							
371	U061	6,000	G	S	0	1							
372	U062	6,000	G	S	0	1							
373	U063	6,000	G	S	0	1							
374	U064	6,000	G	S	0	1							
375	U066	6,000	G	S	0	1							
376	U067	6,000	G	S	0	1							
377	U068	6,000	G	S	0	1							
378	U069	6,000	G	S	0	1							
379	U070	6,000	G	S	0	1							
380	U071	6,000	G	S	0	1							
381	U072	6,000	G	S	0	1							
382	U073	6,000	G	S	0	1							

10. Description of Hazardous Wastes (Continued; Additional Sheet)													
Line Number	A. EPA Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity of Waste	C. UNIT OF MEASURE (Enter Code)	D. PROCESSES									(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
				(1) PROCESS CODES (Enter code)									
383	U074	6,000	G	S	0	1							
384	U075	6,000	G	S	0	1							
385	U076	6,000	G	S	0	1							
386	U077	6,000	G	S	0	1							
387	U078	6,000	G	S	0	1							
388	U079	6,000	G	S	0	1							
389	U080	6,000	G	S	0	1							
390	U081	6,000	G	S	0	1							
391	U082	6,000	G	S	0	1							
392	U083	6,000	G	S	0	1							
393	U084	6,000	G	S	0	1							
394	U085	6,000	G	S	0	1							
395	U086	6,000	G	S	0	1							
396	U087	6,000	G	S	0	1							
397	U088	6,000	G	S	0	1							
398	U089	6,000	G	S	0	1							
399	U090	6,000	G	S	0	1							
400	U091	6,000	G	S	0	1							
401	U092	6,000	G	S	0	1							
402	U093	6,000	G	S	0	1							
403	U094	6,000	G	S	0	1							
404	U095	6,000	G	S	0	1							
405	U096	6,000	G	S	0	1							
406	U097	6,000	G	S	0	1							
407	U098	6,000	G	S	0	1							
408	U099	6,000	G	S	0	1							
409	U101	6,000	G	S	0	1							
410	U102	6,000	G	S	0	1							
411	U103	6,000	G	S	0	1							
412	U105	6,000	G	S	0	1							
413	U106	6,000	G	S	0	1							
414	U107	6,000	G	S	0	1							
415	U108	185,000	G	S	0	1							
416	U109	6,000	G	S	0	1							
417	U110	6,000	G	S	0	1							

10. Description of Hazardous Wastes (Continued; Additional Sheet)													
Line Number	A. EPA Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity of Waste	C. UNIT OF MEASURE (Enter Code)	D. PROCESSES									(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
				(1) PROCESS CODES (Enter code)									
418	U111	6,000	G	S	0	1							
419	U112	6,000	G	S	0	1							
420	U113	6,000	G	S	0	1							
421	U114	6,000	G	S	0	1							
422	U115	6,000	G	S	0	1							
423	U116	6,000	G	S	0	1							
424	U117	6,000	G	S	0	1							
425	U118	6,000	G	S	0	1							
426	U119	6,000	G	S	0	1							
427	U120	6,000	G	S	0	1							
428	U121	6,000	G	S	0	1							
429	U122	87,000	G	S	0	1							
430	U123	6,000	G	S	0	1							
431	U124	6,000	G	S	0	1							
432	U125	6,000	G	S	0	1							
433	U126	6,000	G	S	0	1							
434	U127	6,000	G	S	0	1							
435	U128	6,000	G	S	0	1							
436	U129	6,000	G	S	0	1							
437	U130	6,000	G	S	0	1							
438	U131	6,000	G	S	0	1							
439	U132	6,000	G	S	0	1							
440	U133	6,000	G	S	0	1							
441	U134	3,000	G	S	0	1							
442	U135	6,000	G	S	0	1							
443	U136	6,000	G	S	0	1							
444	U137	6,000	G	S	0	1							
445	U138	6,000	G	S	0	1							
446	U140	6,000	G	S	0	1							
447	U141	6,000	G	S	0	1							
448	U142	6,000	G	S	0	1							
449	U143	6,000	G	S	0	1							
450	U144	6,000	G	S	0	1							
451	U145	6,000	G	S	0	1							
452	U146	6,000	G	S	0	1							

10. Description of Hazardous Wastes (Continued; Additional Sheet)														
Line Number	A. EPA Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity of Waste	C. UNIT OF MEASURE (Enter Code)	D. PROCESSES										(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
				(1) PROCESS CODES (Enter code)										
453	U147	6,000	G	S	0	1								
454	U148	6,000	G	S	0	1								
455	U149	6,000	G	S	0	1								
456	U150	6,000	G	S	0	1								
457	U151	6,000	G	S	0	1								
458	U152	6,000	G	S	0	1								
459	U153	6,000	G	S	0	1								
460	U154	554,000	G	S	0	1								
461	U155	6,000	G	S	0	1								
462	U156	6,000	G	S	0	1								
463	U157	6,000	G	S	0	1								
464	U158	6,000	G	S	0	1								
465	U159	6,000	G	S	0	1								
466	U160	6,000	G	S	0	1								
467	U161	369,000	G	S	0	1								
468	U162	6,000	G	S	0	1								
469	U163	6,000	G	S	0	1								
470	U164	6,000	G	S	0	1								
471	U165	6,000	G	S	0	1								
472	U166	6,000	G	S	0	1								
473	U167	6,000	G	S	0	1								
474	U168	6,000	G	S	0	1								
475	U169	6,000	G	S	0	1								
476	U170	6,000	G	S	0	1								
477	U171	6,000	G	S	0	1								
478	U172	6,000	G	S	0	1								
479	U173	6,000	G	S	0	1								
480	U174	6,000	G	S	0	1								
481	U176	6,000	G	S	0	1								
482	U177	6,000	G	S	0	1								
483	U178	6,000	G	S	0	1								
484	U179	6,000	G	S	0	1								
485	U180	6,000	G	S	0	1								
486	U181	6,000	G	S	0	1								
487	U182	6,000	G	S	0	1								

10. Description of Hazardous Wastes (Continued; Additional Sheet)													
Line Number	A. EPA Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity of Waste	C. UNIT OF MEASURE (Enter Code)	D. PROCESSES									(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
				(1) PROCESS CODES (Enter code)									
488	U183	6,000	G	S	0	1							
489	U184	6,000	G	S	0	1							
490	U185	6,000	G	S	0	1							
491	U186	6,000	G	S	0	1							
492	U187	6,000	G	S	0	1							
493	U188	185,000	G	S	0	1							
494	U189	6,000	G	S	0	1							
495	U190	6,000	G	S	0	1							
496	U191	6,000	G	S	0	1							
497	U192	6,000	G	S	0	1							
498	U193	6,000	G	S	0	1							
499	U194	6,000	G	S	0	1							
501	U196	87,000	G	S	0	1							
502	U197	6,000	G	S	0	1							
503	U200	6,000	G	S	0	1							
504	U201	6,000	G	S	0	1							
505	U202	87,000	G	S	0	1							
506	U203	6,000	G	S	0	1							
507	U204	6,000	G	S	0	1							
508	U205	6,000	G	S	0	1							
509	U206	6,000	G	S	0	1							
510	U207	6,000	G	S	0	1							
511	U208	6,000	G	S	0	1							
512	U209	6,000	G	S	0	1							
513	U210	6,000	G	S	0	1							
514	U211	6,000	G	S	0	1							
515	U213	369,000	G	S	0	1							
516	U214	6,000	G	S	0	1							
517	U215	6,000	G	S	0	1							
518	U216	6,000	G	S	0	1							
519	U217	6,000	G	S	0	1							
520	U218	6,000	G	S	0	1							
521	U219	6,000	G	S	0	1							
522	U220	369,000	G	S	0	1							
523	U221	6,000	G	S	0	1							

10. Description of Hazardous Wastes (Continued; Additional Sheet)												
Line Number	A. EPA Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity of Waste	C. UNIT OF MEASURE (Enter Code)	D. PROCESSES								(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
				(1) PROCESS CODES (Enter code)								
524	U222	6,000	G	S	0	1						
525	U223	6,000	G	S	0	1						
526	U225	185,000	G	S	0	1						
527	U226	369,000	G	S	0	1						
528	U227	55,000	G	S	0	1						
529	U228	369,000	G	S	0	1						
530	U234	6,000	G	S	0	1						
531	U235	6,000	G	S	0	1						
532	U236	6,000	G	S	0	1						
533	U237	6,000	G	S	0	1						
534	U238	98,000	G	S	0	1						
535	U239	87,000	G	S	0	1						
536	U240	6,000	G	S	0	1						
537	U243	6,000	G	S	0	1						
538	U244	6,000	G	S	0	1						
539	U246	6,000	G	S	0	1						
540	U247	6,000	G	S	0	1						
541	U248	6,000	G	S	0	1						
542	U249	6,000	G	S	0	1						
543	U271	6,000	G	S	0	1						
544	U277	6,000	G	S	0	1						
545	U278	6,000	G	S	0	1						
546	U279	6,000	G	S	0	1						
547	U280	6,000	G	S	0	1						
548	U328	6,000	G	S	0	1						
549	U353	6,000	G	S	0	1						
550	U359	6,000	G	S	0	1						
551	U364	6,000	G	S	0	1						
552	U365	6,000	G	S	0	1						
553	U366	6,000	G	S	0	1						
554	U367	6,000	G	S	0	1						
555	U372	6,000	G	S	0	1						
556	U373	6,000	G	S	0	1						

10. Description of Hazardous Wastes (Continued; Additional Sheet)													
Line Number	A. EPA Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity of Waste	C. UNIT OF MEASURE (Enter Code)	D. PROCESSES									(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
				(1) PROCESS CODES (Enter code)									
557	U375	6,000	G	S	0	1							
558	U376	6,000	G	S	0	1							
559	U377	6,000	G	S	0	1							
560	U378	6,000	G	S	0	1							
561	U379	6,000	G	S	0	1							
562	U381	6,000	G	S	0	1							
563	U382	6,000	G	S	0	1							
564	U383	6,000	G	S	0	1							
565	U384	6,000	G	S	0	1							
566	U385	6,000	G	S	0	1							
567	U386	6,000	G	S	0	1							
568	U387	6,000	G	S	0	1							
569	U389	6,000	G	S	0	1							
570	U390	6,000	G	S	0	1							
571	U391	6,000	G	S	0	1							
572	U392	6,000	G	S	0	1							
573	U393	6,000	G	S	0	1							
574	U394	6,000	G	S	0	1							
575	U395	6,000	G	S	0	1							
576	U396	6,000	G	S	0	1							
577	U400	6,000	G	S	0	1							
578	U401	6,000	G	S	0	1							
579	U402	6,000	G	S	0	1							
580	U403	6,000	G	S	0	1							
581	U404	6,000	G	S	0	1							
582	U407	6,000	G	S	0	1							
583	U408	6,000	G	S	0	1							
584	U409	6,000	G	S	0	1							
585	U410	6,000	G	S	0	1							
586	U411	6,000	G	S	0	1							
587	VT01	6,000	G	S	0	1							
588	VT02	50,000	G	S	0	1	S	0	2				
589	VT03	6,000	G	S	0	1	S	0	2				

10. Description of Hazardous Wastes (Continued; Additional Sheet)													
Line Number	A. EPA Hazardous Waste No. (Enter Code)	B. Estimated Annual Quantity of Waste	C. UNIT OF MEASURE (Enter Code)	D. PROCESSES									(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
				(1) PROCESS CODES (Enter code)									
590	VT06	6,000	G	S	0	1							
591	VT08	6,000	G	S	0	1	S	0	2				
592	VT11	6,000	G	S	0	1							
593	VT20	6,000	G	S	0	1							
594	VT99	50,000	G	S	0	1	S	0	2				

11. Map (See instructions on page 38)
Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

12. Facility Drawing (See instruction on page 39).
All existing facilities must include a scale drawing of the facility (see instructions for more detail).

13. Photographs (See instructions on page 39)
All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

14. Comments
 Multiple waste codes are assigned to wastes due to regulatory implications of the mixture and derived-from rules at 40 CFR 261. Therefore, the wastes could contain any combination of the waste codes in this document.

SECTION B
FACILITY DESCRIPTION

1.0 GENERAL DESCRIPTION

ENPRO Services of Vermont, Inc. (“EVI”) operates a commercial hazardous waste storage facility (North American Industrial Classification System Code 562211) located one mile east of the Burlington Airport, 2 miles north of Route 89 Exit 12, and 4 miles west of the town center of Williston, in Chittenden County, Vermont. The facility is located in the Whitcomb Industrial Park. A site location map is included **Section I Appendix A** and was obtained from the US Geological Survey 7.5 Minute Quadrangle Map (Essex Junction and Burlington) dated 1948 and photo revised in 1987.

EVI is permitted to store up to 129,415 gallons of hazardous waste; materials containing polychlorinated biphenyls (PCBs) regulated by TSCA; and solid wastes received from a wide variety of off-site sources. In general, hazardous and solid wastes managed at the EVI facility include: solids, liquids, gases and sludges; contaminated soils and debris; organic wastestreams such as inks, paints, solvents and other hydrocarbons; contaminated waters and leachate; lab packs; and treatment residues. The hazardous wastes managed at the EVI facility are identified in **Section A** of this permit.

In general, the hazardous waste management capabilities of the EVI facility include:

- Storage of hazardous waste in containers and two 1,000-gallon poly tanks
- Consolidation of hazardous wastes for transportation
- Bulking of hazardous waste for transportation
- Storage and off-site transfer of wastes to third party treatment, storage, and disposal facilities
- Depacking and repackaging of laboratory chemicals

EVI is authorized by EPA (see **Section I/Appendix K** of this permit) to store PCBs generated from a wide variety of off-site sources. EVI anticipates storing small PCB articles, PCB containers, PCB waste, and remediation waste, and PCB containing oil. EVI may store PCB materials with greater than 50 parts per million PCB content. EVI is permitted to store 5,500 gallons of materials containing PCB's at concentrations subject to regulation at 40 CFR Part 761.

The EVI facility includes the following waste management units and areas:

1.1 Container Storage Areas (Cells)

EVI stores hazardous waste, PCB materials, and non-hazardous solid waste (e.g., latex paints, household hazardous waste) in a variety of U.S. Department of Transportation approved container types. Containerized wastes are stored in eleven different “storage cells,” as determined by waste type and compatibility. All of the container storage cells are located inside the facility building. Hazardous and solid wastes are stored in the storage cells designated as B-1 through B-6, C-1, C-2, and D-1 through D-6. PCB

materials subject to regulation at 40 CFR Part 761 are only stored in storage cells D-2 and D-5; EVI may also store hazardous and solid wastes in these cells, but will not store PCB wastes in any other cells. A facility diagram illustrating the container storage cell layout, office areas and other areas where wastes are not managed is included in **Figure B-5** of this section.

Storage cell A-1 is used primarily to stage wastes that are received from off-site (i.e., to verify waste information and conduct Level 1 waste analysis), and to prepare wastes for shipment off-site. EVI also maintains two 1,000 gallon poly tanks in storage cell A-1.

1.2 Tanks

EVI utilizes two 1,000 gallon poly tanks that are compatible and suitable for the wastes stored in them (only wastes identified by the VT02, VT03, VT08 codes, and compatible non-hazardous waste waters identified by the VT99 code are stored in the two tanks). Both tanks are located in Cell A-1 (see **Figure B-5** of this section).

1.3 Outdoor Loading Dock and Containment Structures, and Waste Handling Equipment

EVI utilizes an outdoor concrete loading dock and two outdoor secondary containment structures for the purposes of loading and unloading transportation vehicles (see **Figure B-5** of this section). In addition, EVI utilizes waste handling equipment to facilitate the movement of wastes within the facility. This equipment includes metal rollers in each storage cell and portable ramps to move containerized waste from Cell A-1 to other cells.

2.0 GENERAL MAP REQUIREMENTS

Following is a description of each drawing/map provided in this section (See the "Facility Maps" table at the end of this section).

2.1 Topographic Map

A topographic map was prepared for the EVI facility in 2007. The map is entitled "**Figure B-1 - EVI - Topographic Map.**" The scale of the map shown is 1 inch equals 200 feet with 20-foot contour intervals. The vertical datum of the map is based on the National Geodetic Vertical Datum (NGVD) established in 1929. The topographic map includes the EVI property and extends 1,000 feet beyond the facility boundaries.

2.2 Floodplain

The FIRM Flood Insurance Rate Map entitled "**Figure B-2 - EVI - 100-Year Flood Plain**" provides data identifying areas prone to flooding in the vicinity of the EVI facility. Active management areas of the facility are not located in the 100-year floodplain.

2.3 Surface Waters/Surrounding Land Use/Legal Boundaries

The drawing entitled "**Figure B-3 - EVI - Surface Waters and Surrounding Land Use**" shows surface waters (creeks and surface impoundments) and surrounding land uses (industrial, commercial, undeveloped, and residential) based on aerial photography of the facility and surrounding area. The legal boundaries of the property are also provided on the drawing.

2.4 Buildings and Structures; Loading and Unloading and Facility Security

The drawing entitled "**Figure B-4 - EVI - Buildings and Structures, Loading and Unloading, Facility Security, and Internal Roads**" shows the location of existing and proposed major buildings and structures at the facility including loading and unloading facilities. There are no internal roads or perimeter fences at the facility. The drawing entitled "**Figure B-5 - EVI - RCRA Units Subject to Permit**" designates the hazardous waste management units at the facility. Security is discussed further in **Section F** of this permit.

2.5 Fire Controls, Sewers, Potable Water, and Natural Gas

The drawing entitled "**Figure B-6 - EVI - Fire Controls, Sewers, Potable Water, and Natural Gas**" shows the location of water mains and fire control system (excluding portable fire extinguishers identified in the Contingency Plan); storm sewers; potable water service; and natural gas facilities in the vicinity of the EVI facility. There are no sanitary sewers at the facility. Sanitary wastes are managed in an on-site septic system.

2.6 Solid Waste Management Units

The Drawing entitled "**Figure B-7 - EVI - Solid Waste Management Units, Monitor Wells, and Boreholes**" shows the location of solid waste management units at the facility.

2.7 Wind Rose

A wind rose from the Burlington Airport is provided on the drawing entitled "**Figure B-8 - EVI - Wind Rose.**" The wind rose provided is for the year 1989.

Additional map requirements for Land Disposal Facilities are not applicable because there are no land disposal facilities at the EVI facility.

3.0 SEISMIC AND FLOODPLAIN STANDARDS

3.1 Seismic Standard

The EVI facility is not located in a political jurisdiction identified as seismically active per 40 CFR Part 264, Appendix VI.

3.2 Floodplain Standard

The most recent FIRM Flood Rate Insurance Map (500043 0001 B, Panel Number 1 of 12 dated March 2, 1981) entitled "Figure B-2 - EVI - 100-Year Flood Plain" indicates that no active waste management areas of the EVI facility are located within the 100- or 500-year flood boundaries. There are no drainage or flood control barriers.

4.0 TRAFFIC INFORMATION

EVI provides commercial waste storage services. Third-party vehicles enter and leave the facility each day from public thoroughfares. No traffic control signs or signals have been installed specifically for the EVI facility. Vehicular traffic hauling waste to and from the facility consists of box trucks, tanker trucks, drum trailers, and other typical over-the-road commercial hauling equipment. Approximately twenty waste hauling vehicles enter and leave the facility per day.

External roads at the facility are covered with asphalt pavement with an aggregate subgrade or concrete pavement. Roads are adequate for the imposed loads of the vehicles present at the facility. There are no internal roads at the facility.

5.0 OPERATING RECORD

EVI will maintain a facility operating record that, at a minimum, includes the information specified in the following table for the specified timeframes (retention periods).

OPERATING RECORD REQUIREMENTS	RETENTION PERIOD
Description and the quantity of each hazardous waste received, and the method and date(s) of its treatment storage and disposal as required by 40 CFR Part 264 Appendix I	Until closure of the facility
The location of each hazardous waste within the facility and the quantity at each location, including cross references to manifest document numbers if accompanied	Until closure of the facility

OPERATING RECORD REQUIREMENTS	RETENTION PERIOD
by a manifest	
Records documenting personnel training that include job titles for each position, written job descriptions, a description of the type and amount of introductory and continuing training required, and records documenting that the training and experience required have been given to and been completed by facility personnel per 40 CFR Part 264.16.	Until closure of the facility for current employees. Records for former employees must be kept for a period of three years from the date the employee last worked at the facility.
Waste analysis records and documentation:	
264.13 General Waste Analysis	Until closure of the facility
264.17 General Requirements for Ignitable, Reactive, or Incompatible Wastes	Until closure of the facility
264.314 Not applicable to the facility	Not applicable to this facility
264.341 Not applicable to the facility	Not applicable to the facility
264.1034 Test Methods and Procedures (40 CFR Part 264 Subpart AA)	Not applicable to the facility
264.1063 Test Methods and Procedures (40 CFR Part 264 Subpart BB)	Until closure of this facility
264.1083 Waste Determination Procedures (40 CFR Part 264 Subpart BB)	Until closure of this facility
268.4(a) Not applicable to the facility	Not applicable to this facility
268.7 Waste analysis and recordkeeping Level II and III analysis, by-passed containers, sampling/analysis of 1/500 containers, annual review of Level III analyses and procedure, storm water (outdoor containment structures) analyses	Until closure of the facility
The contingency plan and all amendments, and summary reports and details of all incidents that require implementation of the facility contingency plan as specified in 40 CFR Part 264.56(i)	Until closure of the facility
Documentation of local, state and federal officials or Agencies that refuse to enter into the arrangements Described in the Contingency Plan	Until closure of the facility
Records and results of all general facility inspections as required by Section F of this permit and 40 CFR Part	Three years from the date of the inspection

OPERATING RECORD REQUIREMENTS		RETENTION PERIOD
264.15(d)		
Monitoring, testing, or analytical data and corrective action where required by 40 CFR Parts:		
Subpart F of Part 264	Releases from Solid Waste Management Units	If applicable, until closure of the facility
264.19	Construction Quality Assurance Program	Not applicable to this facility
264.191	Assessment of Tank Systems Integrity (Subpart J)	Until closure of the facility
264.192	40 CFR 264.192(g) Written Certification Statements for the Design and Installation of New Tank Systems or Components	Until closure of the facility
264.193	Containment and Detection of Releases (Subpart J)	Until closure of the facility
264.195	Inspections (Subpart J)	Until closure of the facility
264.222		
264.223	Surface Impoundments	Not applicable to this facility
264.226		
264.252		
264.253	Waste Piles	Not applicable to the facility
264.254		
264.276		
264.278	Land Treatment	Not applicable to this facility
264.280		
264.302		
264.303	Landfills	Not applicable to this facility
264.304		
264.309		
264.347	Incinerators	Not applicable to this facility
264.602	Miscellaneous Units	Not applicable to this facility
264.1034 (c) – (f)	Subpart AA Test Methods and Procedures	Not applicable to this facility
264.1035	Subpart AA Recordkeeping requirements	Not applicable to this facility

OPERATING RECORD REQUIREMENTS	RETENTION PERIOD
264.1063 Subpart BB Test Methods and (d) – (i) Procedures	Until closure of the facility
264.1064 Subpart BB Recordkeeping requirements Tank repairs	Until closure of the facility
264.1082 – Subpart CC Recordkeeping 264.1090	Until closure of the facility
Notices to generators as specified by 40 CFR Part 264.12(b) for off-site facilities	3 years from the date the waste accepted for shipment
All closure cost estimates required under 40 CFR Part 264.142, all versions of the facility Closure Plan, and Records of all off-site shipments during closure	Until closure of the facility
A certification no less than annually that the permittee has a program in place to reduce the volume and toxicity of hazardous waste that the permittee generates to the degree determined economically practicable; and the proposed method of treatment, storage, and disposal is that practicable method currently available to the permittee which minimizes the present and future threat to human health and the environment.	Until closure of the facility
Copies of all plans submitted in accordance with 10 V.S.A., § 6629 (Toxic Use Reduction and Hazardous Waste Reduction Plan)	Until closure of the facility
Copies of the notice(s), and the certification and demonstration if applicable, required by the generator or the owner or operator under 40 CFR Part 268.7 and 268.8 for treatment and storage of restricted waste. This includes copies of notices, certifications, restricted waste determinations whether by knowledge of the waste, testing, or supporting data and other documentation as required by 40 CFR Part 268.7(a)(5)	Until closure of the facility
Records demonstrating the storage of hazardous waste at the facility that was necessary for a period beyond one year which was for the purpose of accumulation of such quantities of hazardous waste necessary to facilitate proper recovery, treatment or disposal. These records shall be required beginning when storage has been for a period of one year.	Until closure of the facility

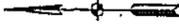
OPERATING RECORD REQUIREMENTS	RETENTION PERIOD
Hazardous waste manifests for shipments received and accepted by the facility.	Until closure of the facility
Certifications as required by 40 CFR 264.196(f)	Until closure of the facility
TSD as a generator requirements:	
Uniform hazardous waste manifests	3 years from the date the waste was accepted by the initial transporter
A copy of each biennial report and manifest exception report	3 years from the due date of the report
Records of test results, waste analyses, or other determinations made in accordance with 40 CFR Part 262.11 (hazardous waste determination)	3 years from the date the waste was last sent to on-site or off-site treatment, storage, or disposal.
Notification of intent to export hazardous waste	3 years from the date the hazardous waste was accepted by the initial transporter
Copy of each EPA Acknowledgement of Consent to export hazardous waste	3 years from the date the hazardous waste was accepted by the initial transporter
Copy of each confirmation of delivery of the hazardous waste from the consignee of an exported shipment of hazardous waste	3 years from the date the hazardous waste was accepted by the initial transporter
Copy of each annual report prepared for exports of hazardous waste.	3 years from the due date of the report
Copy of records required under Vermont Hazardous Waste Management Regulations section 7-204(1)(3) for all "fuel-to-fuel" wastes shipped off-site from the EVI facility	3 years from the date fuel-to-fuel waste is shipped off-site

The retention period for all records required under this permit, the Vermont Hazardous Waste Management Regulations and 40 CFR Parts 262, 264, 265, and 268 are extended automatically during the course of any unresolved enforcement action regarding the facility or as requested by the administrator.

LIST OF DRAWINGS/FACILITY MAPS

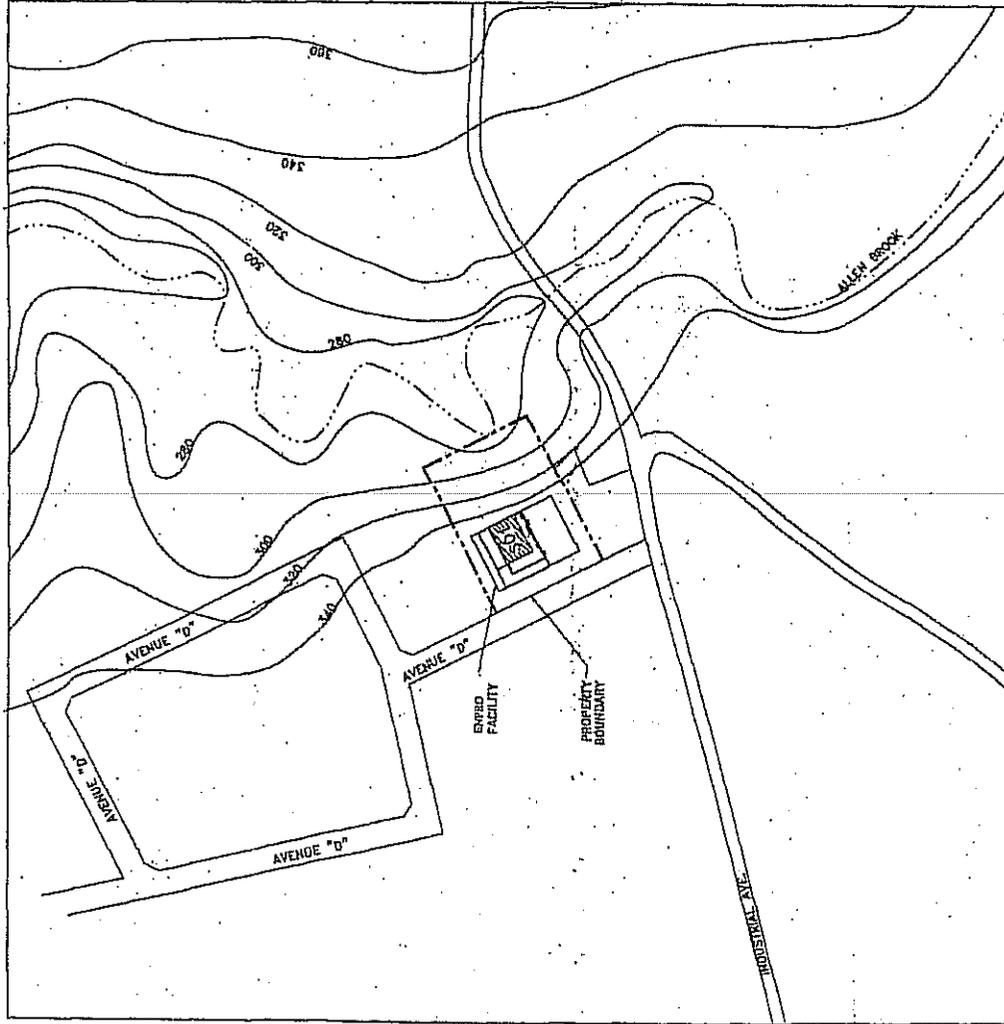
Drawing Source	Title	Drawing Number	Revision Date
EVI	Figure B-1 - Topographic Map	R6082032	May 31, 2007
EVI	Figure B-2 - 100-Year Flood Plain	TOPO2	May 31, 2007
EVI	Figure B-3 - Surface Waters and Surrounding Land Use	R6082032	May 31, 2007
EVI	Figure B-4 - Building and Structures, Loading and Unloading, Facility Security, and Internal Roads	R6082032	May 31, 2007
EVI	Figure B-5 - RCRA Units Subject to Permit	Q5281622	May 31, 2007
EVI	Figure B-6 - Fire Controls, Sewers, Potable Water, and Natural Gas	R6082032	May 31, 2007
EVI	Figure B-7 - Solid Waste Management Units, Monitor Wells, and Boreholes	Q5281622	May 31, 2007
EVI	Figure B-8 - Wind Rose	NA	May 31, 2007

NORTH

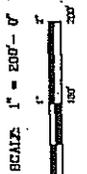


NOTES:

1. BASE MAP IS A COMPOSITE COMPILED FROM AERIAL PHOTOGRAPH, VERMONT. BASE MAP - KERRY CORNER, SHEET NO. 100216, SERIES 5000, 1939. SCALE 1:5000
 2. VERMONT GAS SYSTEM, INC. PROJ. NO. 100216, SERIES 5000, 1939. DATE: MARCH 12, 1968.
 3. USGS TOPO MAPS - ESSEX JUNCTION, VT. & BURLINGTON, VT. QUADRANGLES
 4. KREBS & LANSENG CONSULTING ENGINEERS, INC. WATCOUR INDUSTRIAL PARK, FINAL PLAN, DATED MAY 1984
 5. KREBS & LANSENG CONSULTING ENGINEERS, INC. REM CORP WASTE-WATER SYSTEM, DATED OCT. 1984
2. SEE SECTION "D" OF PERMIT APPLICATION FOR DETAILS OF REGULATED UNITS.
3. THERE ARE NO KNOWN DRINKING WATER WELLS WITHIN 0.25 MILES



- LEGEND
- STREAM/INTERMITTENT STREAM
 - - - PROPERTY BOUNDARY
 - 340 — CONTOUR LINE (20 FT INTERVAL)



REVISIONS

ENPRO Services of Vermont, Inc.
WALLTON, VERMONT

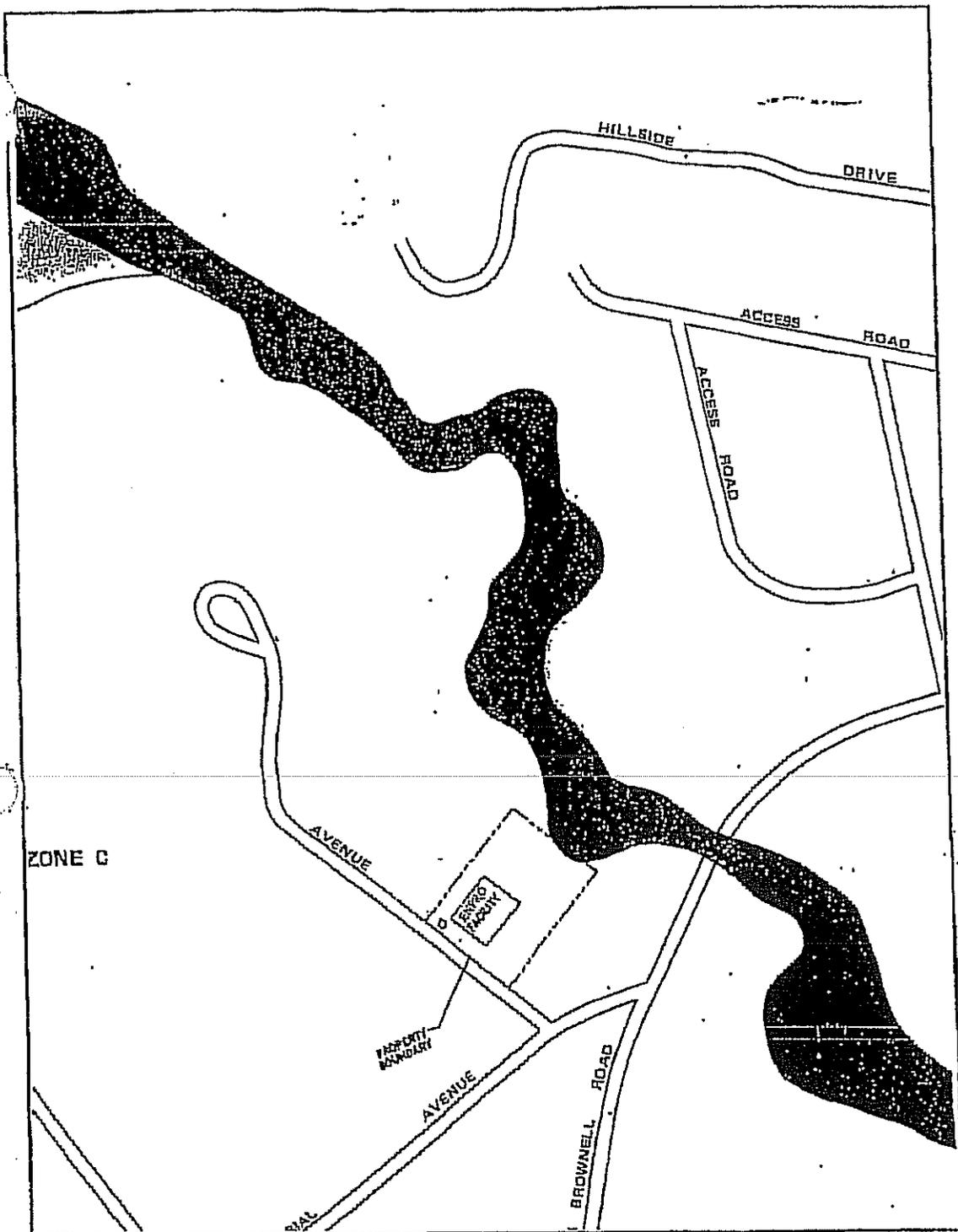


ENPRO Services of Vermont, Inc.

TOPOGRAPHIC MAP

DRAWN BY JAC	DATE 04/11/87	PROJ. NO. 22032	FIG. NO.
APPROVED BY CH	SCALE 1" = 200'		R0002032

Plans B-1

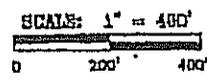


NORTH

Figure B-2

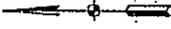
NOTES:

- 1. SOURCE OF DRAWING: FIRM MAP, WILLISTON, VERMONT, PANEL 1 of 12
- 2. ZONE A - 100 YEAR FLOOD ELEVATION



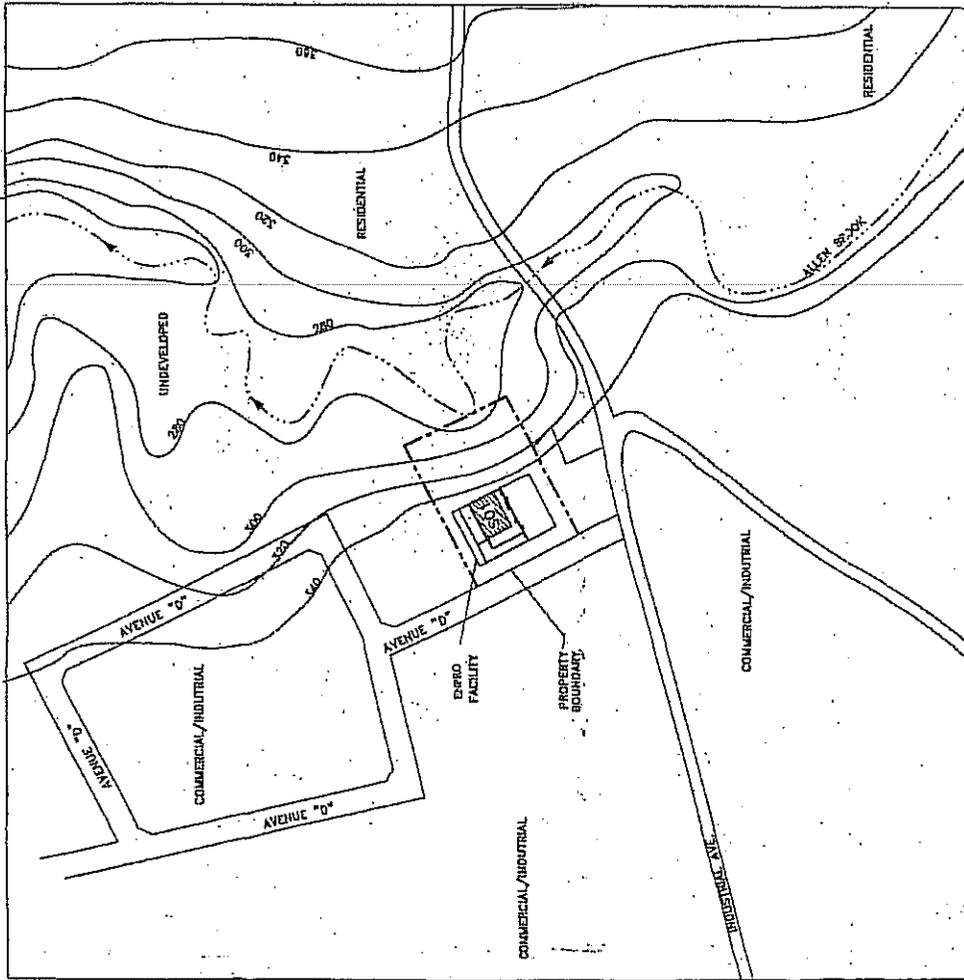
ENPRO Services of Vermont, Inc. Williston, Vermont		
100 YEAR FLOOD PLAN		
DRAWN BY: JHC		DATE: 5/31/97
APP. BY: CJ		SCALE: 1/5000
JOB NO. 96002		DWG. T0902
ENPRO Services of Vermont, Inc.		

NORTH

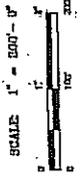


NOTES:

1. BASE MAP IS A COMPOSITE COMPILED FROM:
AERIAL PHOTOGRAPH, VERMONT DEPARTMENT OF CONSERVATION, SERIES 3000, 1968. SCALE 1:5000
 2. VERMONT GAS SYSTEM, INC. PROJ. NO. 7701, MARCH 1984 & PROJ. NO. 5, MARCH 12, 1988.
 3. USGS TOPO MAPS--ESEX JUNCTION, VT. & BURLINGTON, VT. QUADRANGLES
 4. KERBS & LANSING CONSULTING ENGINEERS, INC. WHITCOMB INDUSTRIAL PARK, FINAL PLAN, DATED MAY 1984.
 5. KERBS & LANSING CONSULTING ENGINEERS, INC. WELLSVILLE WATER SYSTEM, DATED OCT. 1984.
2. SEE SECTION "D" OF PERMIT APPLICATION FOR DETAILS OF REGULATED SPITS.
 3. LAND USE DESIGNATION BASED ON AERIAL PHOTOGRAPHY EXPOSED IN SPRING 1988.



- LEGEND
- STREAM/INTERMITTENT STREAM
 - - - - - PROPERTY BOUNDARY
 - 340
 - 20 FT INTERVAL
 - FLOW DIRECTION



REVISIONS

NO.	DATE	DESCRIPTION

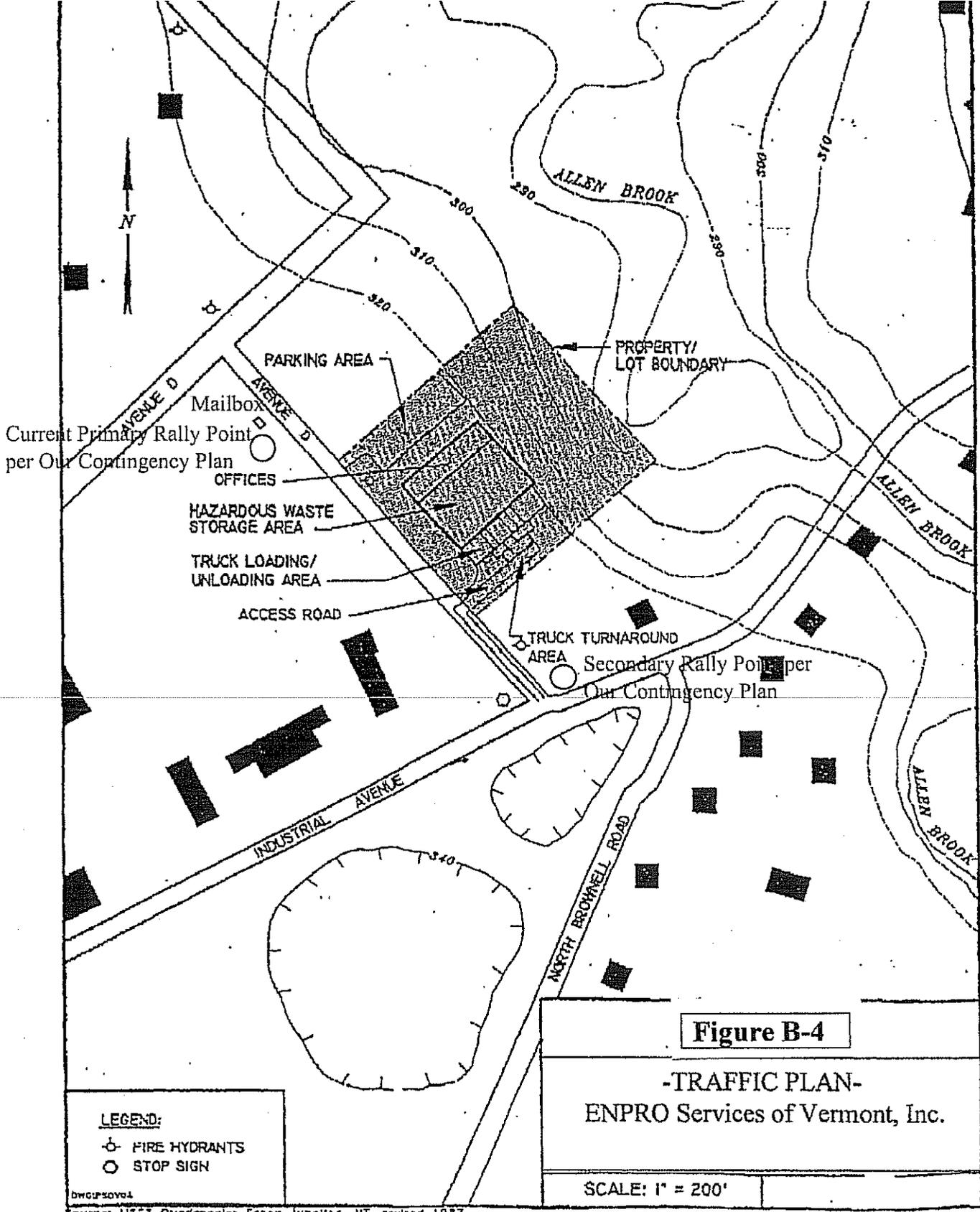


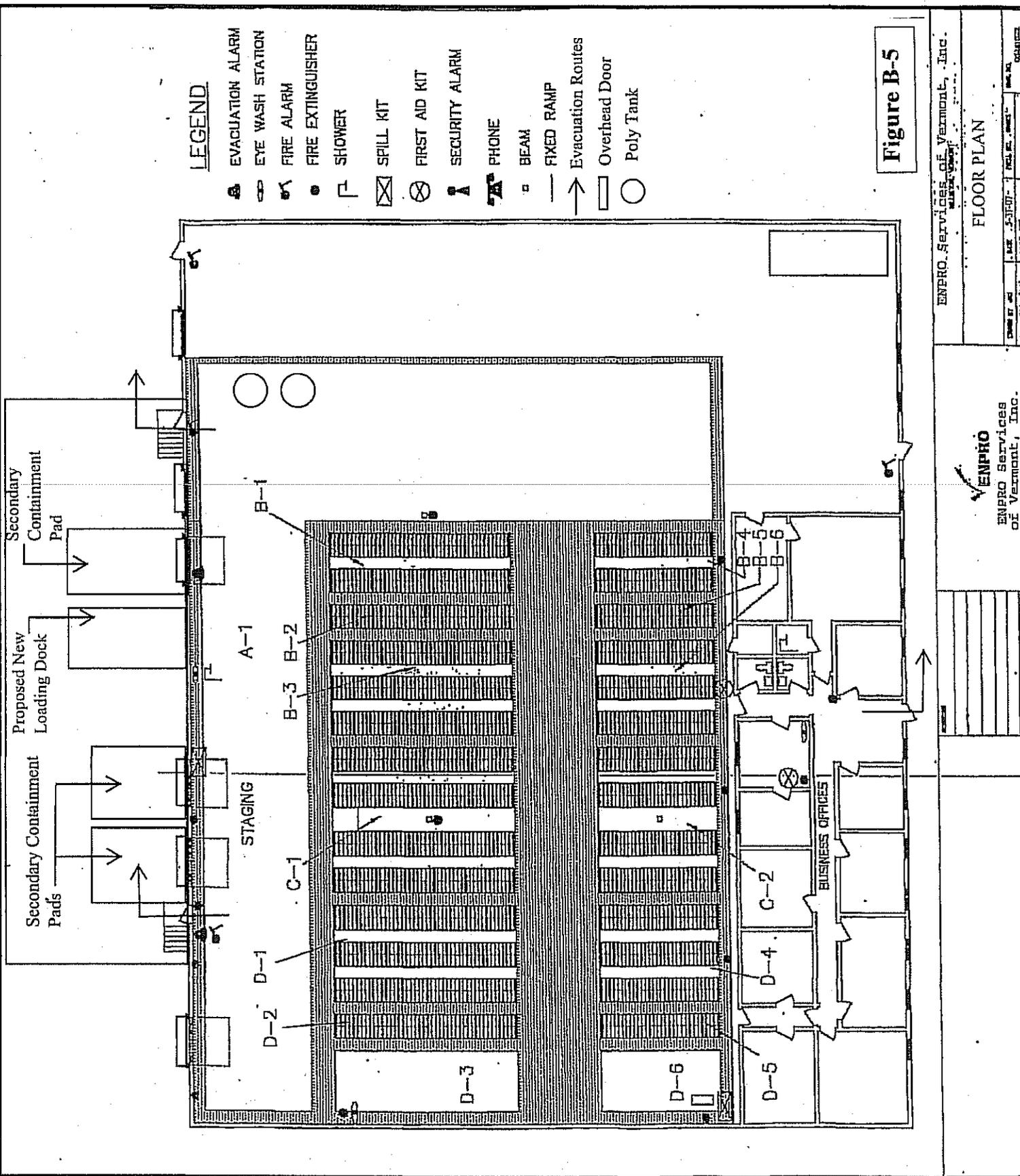
ENPRO Services of Vermont, Inc.

ENPRO Services of Vermont, Inc.
WELLSVILLE, VERMONT

SURFACE WATERS AND SURROUNDING LAND USE

DESIGNED BY: JAC	DATE: 04-18-1987	PROJ. NO. 2332	DWG. NO. R5082032
APPROVED BY: CJI	SCALE: 1" = 200'		





LEGEND

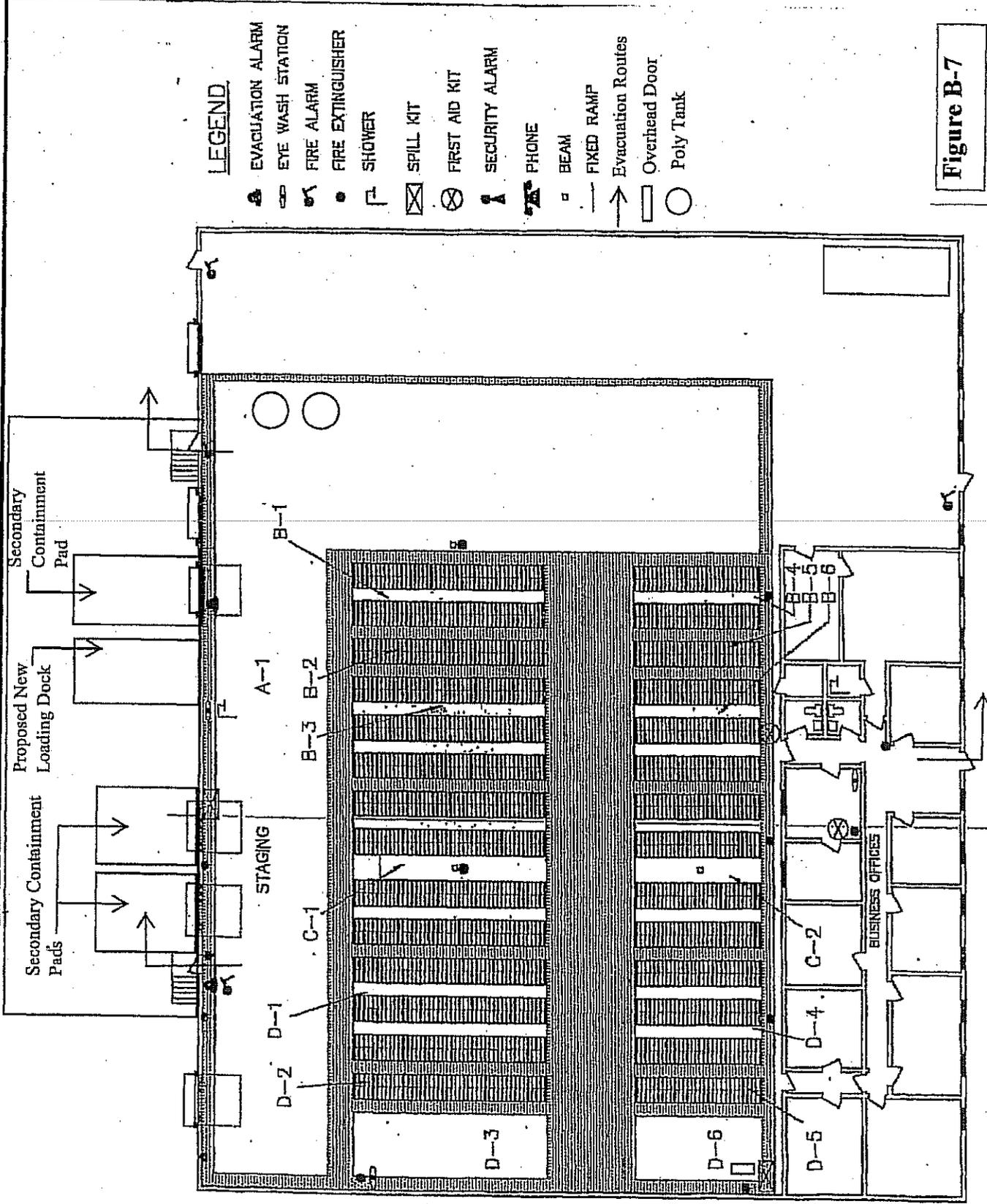
- EVACUATION ALARM
- EYE WASH STATION
- FIRE ALARM
- FIRE EXTINGUISHER
- SHOWER
- SPILL KIT
- FIRST AID KIT
- SECURITY ALARM
- PHONE
- BEAM
- FIXED RAMP
- Evacuation Routes
- Overhead Door
- Poly Tank

Figure B-5

ENPRO Services of Vermont, Inc.
 1000 ...
 ...
 ...

ENPRO
 ENPRO Services
 of Vermont, Inc.

FLOOR PLAN



LEGEND

- EVACUATION ALARM
- EYE WASH STATION
- FIRE ALARM
- FIRE EXTINGUISHER
- SHOWER
- SPILL KIT
- FIRST AID KIT
- SECURITY ALARM
- PHONE
- BEAM
- FIXED RAMP
- Evacuation Routes
- Overhead Door
- Poly Tank

Figure B-7

ENPRO
ENPRO Services of Vermont, Inc.

FLOOR PLAN

ENPRO Services of Vermont, Inc.

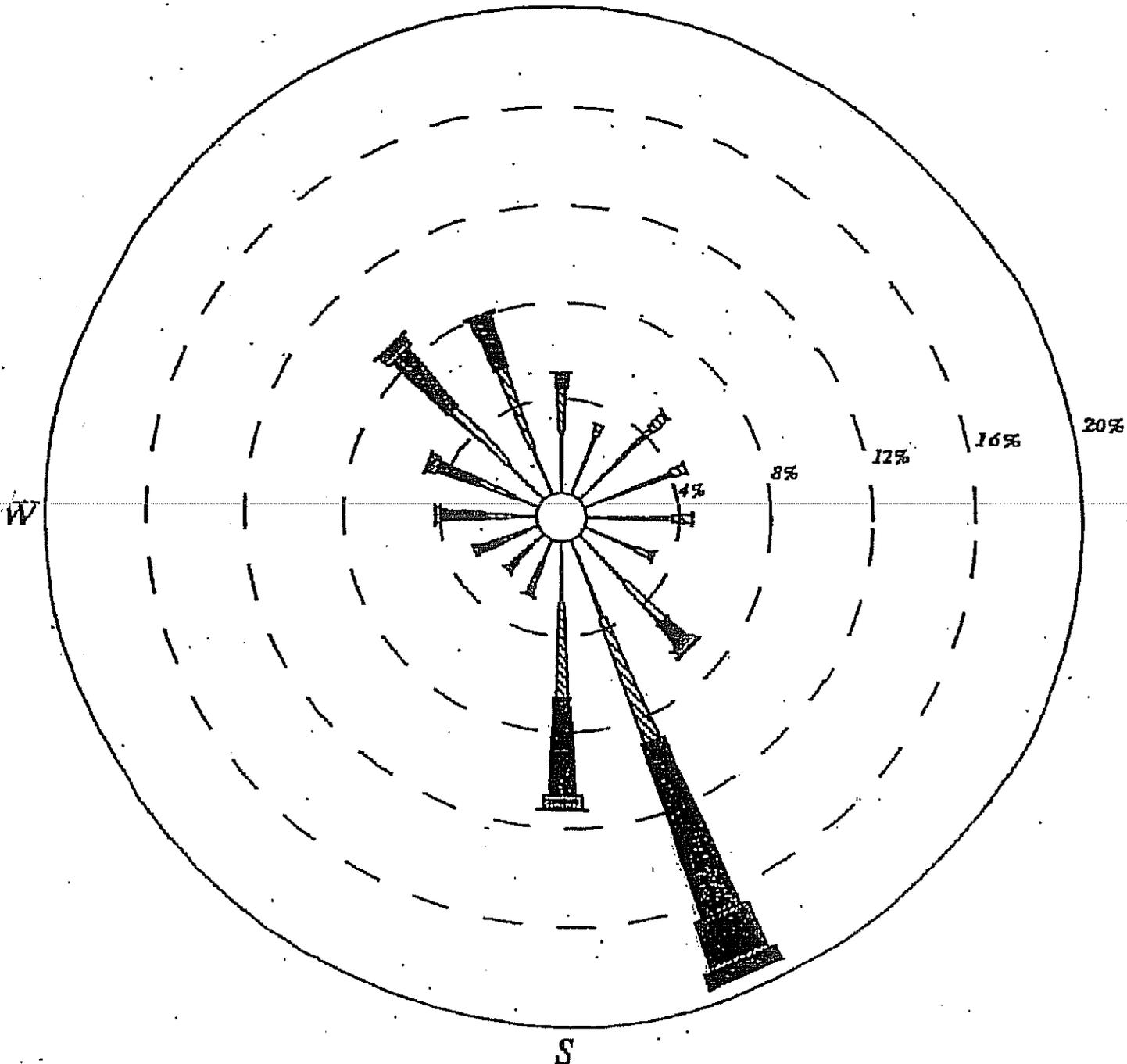
1. There are no monitoring wells or boreholes

Wind Rose

Burlington, VT 1989

January 1-December 31; Midnight-11 PM

N

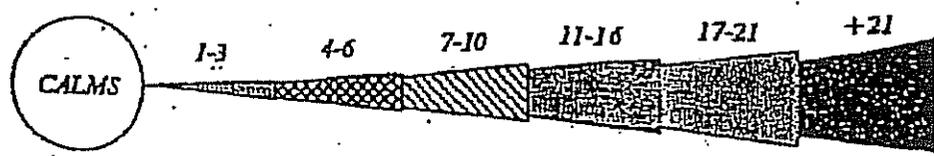


CALM WINDS 2.07%.

WIND SPEED (KNOTS)

Figure B-8

NOTE: Frequencies indicate direction from which the wind is blowing.



Hazardous Waste Facility Permit
ENPRO Services of Vermont, Inc.
EPA ID No. VTR000517052
Waste Analysis Plan
September 2010

SECTION C
WASTE ANALYSIS PLAN

1.0 GENERAL OVERVIEW

Pursuant to 40 CFR 270.14 (b)(3), a hazardous waste management facility is required develop and follow a Waste Analysis Plan (WAP) that meets the requirements of 40 CFR 264.13 (b) and (c). This waste analysis plan establishes the following:

- The procedures for qualifying, accepting and analyzing the contents of each waste container managed at ENPRO Services of Vermont, Inc. (“EVI”).
- The parameters for which each waste will be analyzed and the rationale for selecting these parameters.
- The test methods used to test for each parameter.
- The methods used to obtain a representative sample of waste to be analyzed.
- The frequency at which analysis of waste will occur to ensure that waste is characterized accurately.
- The waste analyses and supplemental information that hazardous waste generators or their authorized agent (customers) will supply.

Emphasis is placed upon obtaining accurate information about the chemical and physical makeup of each waste received by EVI. This information, which is to be detailed in a waste-specific Waste Information Profile (WIP) maintained as part of the facility record, may be based on the generator knowledge of the waste and/or chemical and physical analyses of a representative sample of the waste.

EVI accepts “containerized” and “bulk” waste for storage prior to consolidation and/or shipment off-site (see **Section D** of this permit). Wastes managed by EVI may be regulated under the Resource Conservation and Recovery Act (RCRA), the Toxic Substances Control Act (TSCA), Superfund (CERCLA), and Vermont’s Hazardous Waste Management Regulations (VHWMR). EVI accepts wastes in a variety of physical forms, including liquids, sludges, solids, and compressed gases. For the purposes of this WAP, “containerized” waste is waste managed in containers that can be moved manually or with a forklift (e.g., U.S. Department of Transportation (“U.S. DOT”) approved shippable containers, drums, pails, bags, boxes, pallets, ton sacks, flasks, cylinders). “Bulk waste” is received and shipped in accordance with applicable U.S. DOT regulations.

EVI also accepts “lab packs” which are containers that hold a variety of chemicals, products or

small quantities of laboratory samples. Each lab pack container is prepackaged in accordance with applicable U.S. DOT regulations that are based on compatibility, content, and size of individual samples. An inventory-packing list accompanies each lab pack container and identifies, among other things, the content, quantity and size of each container within the lab pack, and applicable RCRA and Vermont hazardous waste code(s). See **Appendix B** of this permit for an example Lab Pack form.

EVI also accepts “bulk or consolidation packs” that are containers that hold one type of material (e.g., paints). Each bulk or consolidation pack container is prepackaged in accordance with applicable U.S. DOT regulations.

2.0 WASTE PREQUALIFICATION PROCEDURES

All waste accepted by EVI must be approved through the prequalification process. As described below, the prequalification process requires completion of a Waste Information Profile (WIP) by the generator or their authorized agent, and review and approval of the WIP by EVI.

2.1 Waste Information Profile (“WIP”)

A WIP must be completed, signed and submitted by the waste generator or the generator’s authorized agent for each waste received by EVI. Each WIP is reviewed by EVI to determine if EVI can accept the waste. The hazardous waste codes that may be accepted at EVI are listed in **Section A** of this permit. The EVI WIP form is included in **Appendix A** of this section. A generator may use a different WIP form, provided the form is reviewed by EVI and found to be equivalent to the EVI form.

Based on the information provided in the WIP, an EVI Supervisor or Senior Waste Technician may either approve the WIP or determine that additional information is necessary prior to approving the waste. A WIP shall not be approved if any pertinent section of a WIP is omitted; an inconsistency is identified on the WIP (e.g., acidic solution with pH 14); the generator does not provide sufficient information about the waste generating process and/or materials used in the process; or there is any reason to suspect that a waste contains a listed hazardous waste, exhibits a hazardous waste characteristic, or meets a Vermont hazardous waste listing (i.e., “VT” codes).

In the event that a WIP is not approved, additional information (e.g. MSDS) must be provided or the waste must be analyzed before the WIP can be approved by EVI. In general, chemical and/or physical analyses are performed to resolve any hazardous waste determination questions that cannot be resolved using “generator knowledge.” The WIP shall document the use of generator knowledge and/or analysis in making a hazardous waste determination. All supporting documentation must be included with the copy of the WIP maintained at the EVI facility. Any completed WIP for waste that is unused “product” material, with the exception of household-generate wastes and waste contained

within labpacks, must include a Material Safety Data Sheet. In all cases, if the EVI Supervisor or Senior Waste Technician is not confident that a waste has been characterized accurately, he or she shall not approve the WIP.

Upon approval of a WIP, the EVI Supervisor or Senior Waste Technician shall ensure that the applicable “process code” and “approval code” information is added to the top of the WIP form.

Each WIP must be reviewed by the generator or the generator’s authorized agent on an annual basis. Following this review, the generator or authorized agent must provide a signed statement to EVI that either certifies the waste generating process and the chemical and physical characteristics of the waste remain unchanged or specifies any changes to the waste or generating process. If a signed certification statement is not returned to EVI, the WIP will be canceled.

2.2 Determination of Outbound Designated Facility

As part of the prequalification process following WIP approval, the EVI Supervisor or Senior Waste Technician also selects a designated facility to which EVI will likely ship the waste after the waste has been received by the EVI facility. Selection of the designated facility is based on the WIP, assigned RCRA and Vermont hazardous waste codes, any applicable land-disposal restriction regulations, generator request/requirement, and any requirements or restrictions of the designated facility’s permit or license. Upon selection of a designated facility, approved waste may be scheduled for transport and delivery to EVI.

2.3 Lab Pack Waste

In addition to the prequalification requirements described in sections 1.1 and 1.2, above, for each lab pack waste stream, the EVI Supervisor or Senior Waste Technician must review and approve a packing list compiled for each lab pack container using the Lab Pack Contents Form (see **Appendix B** of this section). If any incompatible or unacceptable material is listed on the Lab Pack Contents Form, the generator or generator’s agent is given the option of either properly repacking that material or having the lab pack container rejected by EVI.

3.0 WASTE RECEIVING PROCEDURE

When a shipment of waste (containerized waste, bulk waste, and/or lab packs) arrives at the EVI facility, an EVI Supervisor or Senior Waste Technician is responsible for either receiving or rejecting the waste upon completing the following procedure:

- Review the manifest or shipping paper for accuracy and completeness
- Unload containers to the EVI waste receiving area (i.e., Cell A-1)
- Check container labels for completeness and consistency with the WIP
- Check the condition of each container and verify that it is U.S. DOT-approved
- Verify that each container type is consistent with the information on the WIP, manifest and waste stored therein
- Assign a unique container number to each container using the facility computer system, and affix a sticker marked with that unique number to the container
- Perform the Level I waste analysis procedure described below
- If applicable, perform the Level II and Level III waste analysis procedures described below

3.1 Level I Analysis:

The EVI Supervisor or Senior Waste Technician will open and inspect each container and bulk load in the waste receiving areas (i.e., Cell A-1 for containers, and within the outdoor secondary containment bays for bulk loads). With the exception of multiple containers of the same waste (i.e., waste described by the same WIP and that appear consistent upon visual inspection), Lab Packs, and other “non-sampleable” wastes (e.g., fluorescent lamps, batteries, PPE), a sample will be collected from each container and bulk load in accordance with the facility’s Sampling SOP (see **Appendix C** of this section) for the purpose of performing Level I analysis. In the case of multiple containers of the same waste, each container will be opened to visually confirm consistency of the waste, but one sample will be collected from one of every ten containers received. For lab packs, the content of each container is compared to the Lab Pack Contents Form.

Upon opening each container, the waste will be visually compared to information on the container label, manifest, and WIP. For liquids and semi-solids, a thief/tube will be used to check for layering and, if applicable, to determine the approximate percentage of each layer. The collected sample will be evaluated for the following properties:

- % Liquid, % Solid, % Sludge content (by EVI-1 method)
- Color (EVI-1)
- Viscosity (EVI-1)
- pH (EVI-2), except for solid and non-aqueous wastes

If the evaluation of waste properties indicates that the waste is potentially ignitable, EVI will screen the waste for flash point utilizing a bench-top screening procedure (EVI-5). Waste streams that are potentially subject to flash point screening include: non-lab pack wastes, non-virgin products, and liquid wastes that are not already characterized as exhibiting the characteristic of ignitability (D001).

The results of the visual inspection and sample evaluation will be compared to the WIP.

If the Level I analysis identifies a discrepancy with the WIP, EVI will immediately contact the generator or the generator's agent and attempt to resolve the discrepancy.

Any waste that does not conform to the WIP will be quarantined in Cell A-1. If the discrepancy is resolved by contacting the generator, the waste will be moved to an appropriate storage cell by the end of the work shift. If the discrepancy can not be resolved by the generator, EVI will follow the Level II procedure below, and the waste will remain quarantined in Cell A-1.

Level 1 analysis is documented using the Level I QA/QC report (see Appendix F of this section).

3.2 Level II Analysis:

If the Level I analysis identifies a discrepancy with the WIP, and the discrepancy cannot be resolved by the generator, then EVI will perform Level II analysis of the waste, reject the waste back to the generator, or ship the waste to an alternate treatment, storage, or disposal facility. EVI will make every effort to resolve the discrepancy and accept the waste. Vermont's Waste Management Division will be notified of any wastes rejected back to Vermont generators. Level II analysis includes the following tests, as appropriate:

- pH
- Water Reactivity
- Reactive Sulfide Spot Test
- Ignitability
- Reactive Cyanide Spot Test
- Oxidizer Screen
- Specific Gravity
- % Suspended Solids
- Chlorine Spot Test
- Polychlorinated Biphenyl (PCB) Screen
- Flash Point
- Free Liquids/Paint Filter Test
- RCRA 8 metals
- Volatile Organics
- Any other parameter deemed necessary

Any waste that is subject to Level II analysis will be quarantined in Cell A-1 until the discrepancy with the WIP is resolved.

Level II analysis will be subcontracted to an independent state certified or NELAC laboratory that uses ASTM and/or SW-846 analytical and test methods. The results of all Level II analyses will be documented in a log (see **Appendix G** of this section) maintained as part of the facility operating record

3.3 Level III Analysis:

EVI will select and analyze waste samples received at the facility as follows:

The contents of one out of every 500 containers of waste (including solid and non-hazardous waste) received by EVI will be sampled and tested according to this Level III analysis procedure. EVI's container tracking system will be used to identify every 500th container received by EVI in sequential order. In the event that the contents of the 500th container cannot be sampled (e.g., batteries, CRTs, lamps, lab packs, etc.), or is verified to be either an unused "product" material (MSDS available) or household hazardous waste, EVI will count forward (i.e., 501st, 502nd, etc.) until a container of waste is located that can be sampled. EVI will document the unique container number(s) of each waste container that is by-passed in the facility operating record along with the rationale for by-passing each container.

On an annual basis, EVI will review the Level III analysis procedure and the previous year's Level III analysis results (i.e., testing data) to ensure that a variety of waste types and customers have been, and will continue to be, represented. This annual review will be documented in the facility operating record. Any potential changes to the Level III analysis procedure that are identified by EVI based on this review should also be documented in the facility operating record.

Once a container is identified for the purpose of conducting Level III analysis, the EVI Supervisor or Senior Waste Technician will collect a sample in accordance with EVI's SOP (see **Appendix C** of this section). In addition to completing Level I analysis and documenting the physical description of the waste, the following parameters will be tested, as appropriate:

- pH
- Water Reactivity
- Reactive Sulfide Spot Test
- Ignitability
- Reactive Cyanide Spot Test
- Oxidizer Screen
- Specific Gravity
- % Suspended Solids
- Chlorine Spot Test
- Polychlorinated Biphenyl (PCB) Screen
- Flash Point
- Free Liquids/Paint Filter Test
- RCRA 8 metals
- Volatile Organics

- Any other parameter deemed necessary

Level III analyses will be subcontracted to an independent state certified or NELAC laboratory that will use ASTM and SW-846 analytical and test methods.

A record of all Level II and Level III analysis will be maintained by EVI for each waste sampled/analyzed, as part of the facility operating record. The Level II and Level III record will include:

- A copy of the chain of custody document (see **Appendix E** of this section)
- Copies of all applicable analytical and test results and lab reports including the results of the Level I analysis
- A copy of the original (incoming) manifest
- A copy of the original WIP
- Documentation of any discrepancies identified by the Level I, II or III analysis
- If applicable, a copy of any written or correspondence with the generator related to resolving a WIP discrepancy and documentation of relevant conversations with the generator regarding same.
- If applicable, copies of any written correspondence with the generator and Vermont Waste Management Division related to resolving a manifest discrepancy and documentation of relevant conversations with the generator or Vermont Waste Management Division regarding same.
- If applicable, a copy of the revised WIP
- The completed Level II/Level III QA/QC checklist (see **Appendix G** of this section)

If a WIP is determined to be inaccurate through Level II or Level III analyses, the EVI Supervisor or Senior Waste Technician will review for accuracy all other WIPs corresponding to wastes generated by the generator who submitted the inaccurate WIP.

3.4 Final Acceptance and Placement of Waste in Storage

Upon verification that a containerized waste or bulk waste is consistent with the corresponding WIP, the waste will be moved from the receiving area (Cell A-1) to an appropriate storage cell. Movement to an appropriate storage cell shall occur within 36 hours of off-loading waste from the transport vehicle, excluding weekends and holidays. Any waste that does not conform to the corresponding WIP will be quarantined in Cell A-1 until the discrepancy is resolved with the generator. Upon resolution of the discrepancy, the waste will be moved to an appropriate storage cell by the end of the work shift.

4.0 OUTBOUND WASTE SCREENING PROCEDURES

Containerized wastes that are compatible materials, supplemental fuels, used oil, or wastewater may be consolidated into bulk transportation vehicles at the EVI facility (see **Section D** of this permit). Prior to transferring waste into a bulk transport vehicle, the EVI Supervisor or Senior Waste Technician will review all applicable WIPs, test for compatibility (see method EVI-12); for supplemental fuels, EVI will also test for PCBs.

Waste that is bulked on-site for outbound shipments will be tracked using the Bulk Consolidation Tracking Sheet (see **Appendix D** of this section). Upon completion, this waste tracking form will be maintained with the facility copy of the outbound manifest as part of the facility operating record.

Bulk transport vehicles may be kept on-site for a maximum of 72 hours from the time/date when waste is first loaded onto the vehicle. All bulk transport vehicles will be located within secondary containment throughout loading (and/or unloading) operations.

5.0 MANIFEST DISCREPANCIES

When a manifest discrepancy is discovered for a shipment received by EVI, EVI will attempt to resolve the discrepancy with the generator. If the discrepancy is not resolved within 15 days, EVI will submit a letter to the Vermont Waste Management Division in accordance with Section 7-704(g)(3) of the VHWMR.

6.0 UNKNOWNNS

EVI does not accept “unknown” wastes. All wastes received by EVI, must be approved prior to shipment to the EVI facility. In the event that an unknown waste is left at the EVI facility during off hours, EVI will immediately contact the Vermont Waste Management Division. Following consultation with the Vermont Waste Management Division, EVI will attempt to identify the waste using Level I and/or Level II analyses for the purpose of EVI accepting the waste, or preparing the waste for shipment to an appropriate off-site facility.

7.0 WASTE SAMPLING

Procedures for collecting representative samples are identified below. Collected samples will either be returned to their original container or consolidated with compatible materials prior to shipment off-site for proper disposal. Any “waste” material generated by sampling activities is either returned to the original waste container or EVI will utilize a new container.

7.1 Sampling Methods

The methods and equipment used for sampling waste vary with the form and consistency of the waste to be sampled. EVI will select the most appropriate representative sampling methods, techniques, devices, and containers from those included/described in either the EPA document “Test Methods for Evaluating Solid Wastes” (SW-846) or the “American Society for Testing and Materials” (ASTM) standards. A representative sample is defined as a sample exhibiting average properties of the whole waste.

EVI standard operating procedures designed to protect worker health and ensure worker safety while sampling the variety of waste types received by the EVI facility are included in **Appendix C** of this section.

7.2 Sample Tracking Documentation

All sampling will be performed by EVI personnel.

Samples collected for on-site Level I analysis will be documented utilizing the Level I QA/QC report (see **Appendix F**).

All Level II and III sampling will be documented utilizing the “Sample Record” log and the “Level II/Level III QA/QC Checklist” included in **Appendix G** of this section. Chain-of-custody forms (see **Appendix E** of this section) are used for tracking Level II and Level III samples sent for off-site laboratory analyses and testing.

7.3 Sampling Personnel

Sampling is performed in the waste receiving area (Cell A-1) by the EVI Supervisor or Senior Waste Technicians.

7.4 Sample Labels

Labels are affixed to each sample container prior to, or at the time of, sampling. At a minimum, the labels include the following information, if applicable:

- Generator name
- Common name of waste
- Name of sample collector
- Date of collection
- Unique container number
- WIP/waste stream number

A unique container number sticker, that matches the unique container number assigned to the original waste container, is also affixed to sample containers used for Level II and III analyses.

8.0 PARAMETERS AND RATIONALE

The following table summarizes the analytical parameters and rationales used to determine the general and specific characteristics of a waste stream. ASTM and SW-846 are used as guidelines in developing the following analytical methods:

PARAMETER	METHOD	RATIONALE FOR SELECTION
Physical Description	EVI-1	Used to determine the general characteristics of the waste stream. This facilitates subjective comparison of the sample waste with prior descriptions. EVI personnel check for color, general form, layering, and consistency.
pH Screen	EVI-2	Required of all water-bearing liquid, solid, and semi-solid waste streams to determine the corrosivity of the waste. The apparent pH of non-aqueous wastes will also be performed.
Water Reactivity	EVI-3	Used to determine whether the waste has a potential to react with water to generate heat, flammable gases, or other products. The test does not apply to wastes already in contact with excess water.
Reactive Sulfides Screen (Spot Test)	EVI-4	Used to indicate whether the waste produces hydrogen sulfide upon acidification below pH 2. It is not required if the pH of the waste is <6 or if the waste is not water-soluble. Wastes containing sulfides with concentrations less than 500 ppm are considered non-reactive
Ignitability	EVI-5	Indicates the fire-producing potential of the waste and determines whether the waste is RCRA-ignitable. This test will be applied to all wastes liquids, solids, and sludges that are selected for analysis.
Reactive Cyanides Screen (Spot Test)	EVI-6	Indicates whether the waste produces hydrogen cyanide upon acidification below a pH of 2. It is not required for wastes with pH <6 or if the waste is not water-soluble. Wastes that contain cyanide at concentrations less than 250 ppm are considered non-reactive.
Oxidizer Screen	EVI-7	A general qualitative test used to determine if a waste is an oxidizer. Oxidizers have the potential to react with a wide range of wastes and therefore often need to be segregated.

PARAMETER	METHOD	RATIONALE FOR SELECTION
Specific Gravity	EVI-8	Used in conjunction with other test data to determine probable characteristics of materials and their conformance to the WIP.
Percent Suspended Solids	EVI-9	Used in assessing the feasibility of wastewater treatment.
Chlorine (Spot Test)	EVI-10	Indicates if the material is chlorinated. Information is used to check conformance to the WIP, as well as disposal options.
Polychlorinated Biphenyls Screen	EVI-11	Determines PCB content in order to verify WIP information and assess applicability under TSCA.
Compatibility Testing	EVI-12	Prior to a waste being commingled with other wastes, it is tested to verify compatibility. Liquid or sludge wastes are combined to assess their compatibility. Solid waste compatibility is determined based on generator-provided information and records of bulk materials previously received and/or currently stored.
Total RCRA 8 Metals	EVI-13	Determines if the concentration of arsenic, barium, cadmium, chromium, lead, mercury, silver and selenium exceeds the limits in 40 CFR 261.24.
Total RCRA characteristic Volatile Organics	EVI-14	Determines if the waste is potentially listed (e.g., contains a volatile organic compound potentially used as a solvent) and if the concentration of any volatile organic compound exceeds the limits in 40 CFR 261.24.

9.0 TEST METHODS

The test methods used to confirm that waste received by EVI conforms to the corresponding WIP are described below.

EVI-1: Physical Description

The waste is sampled, visually inspected, and its physical appearance is recorded, the description is to include:

- color
- physical state (% solid, % sludge, % liquid)
- layers (single, bi-layered, multi-layered)
- presence of freestanding liquid using SW846-9095 as a guideline (Paint Filter Liquids Test)

If necessary, a Coliwasa tube or thief/tube is to be used to check for layering and to determine the approximate percentage of each layer and approximate percentage of solid, sludge, and liquid.

EVI-2: pH Screen

The pH of a solid is measured by placing 20 grams of sample into a cup. 20 milliliters (ml) of deionized water is added and the mixture is stirred for 30 seconds. The pH of the slurry is then taken and recorded using SW846-9040 and SW846-9041 as guidelines. The pH of liquids and sludges is taken using SW846-9040 and SW846-9041 as guidelines.

EVI-3: Water Reactivity

The water reactivity of a liquid or solid is determined by adding approximately 3 mL of water to 0.1 mL of liquid or 0.1 gram of solid. The mixture is observed to detect heating (more than 15° C temperature rise) or turbulent gas evolution (more than 10% of the mixture volume). If the mixture reacts as described above, the test is considered positive. If the addition of water causes the material to be considered reactive under any definition of 40 CFR 261.23 and Section 7-207 of the VHWMR, the material is considered water-reactive.

EVI-4: Reactive Sulfides Screen (Spot Test)

2 to 4 drops of the material are placed on a spot plate. Then, a strip of lead-acetate paper moistened with 1 drop of water is placed over the spot plate cavity containing the waste. Next, 2 to 3 drops of 3M HCl is added. Black PbS forms in the paper after 0.5 to 1 minute if sulfide is present. The threshold limit of this method is around 4 PPM sulfide.

EVI-5: Ignitability

The ignitability screen is determined by placing the sample in a 125 to 250 mL cup. The cup is covered and allowed to stand for at least five minutes. After five minutes the cover is removed and a flame is placed near the opening of the cup. If a flash occurs, the ignitability screen is considered positive. If no flash is observed, a small amount is placed on the end of a spatula and heated over a flame. If the material ignites and sustains a flame for 10 seconds, the result is Negative B (per industry standard). If the sample does not sustain a flame for 10 seconds or ignite, the result is Negative C. A closed cup flash test will be used to determine flash point of any Negative B material.

EVI-6: Reactive Cyanides Screen (Spot Test)

Cyanide is determined by placing 2 to 4 drops or a small spatula tip of the sample on a spot plate. Two drops of water are then added to the waste. Next, one drop of chloramine-T solution followed by one drop of pyridine-barbituric acid solution is added to the waste. If the solution turns dark red or carmine after 10 to 30 seconds, this is a positive response.

The presence of cyanide can be detected above 60 ppb in aqueous samples (3 drop size) and 10 ppm in solid samples (1 gram size).

Reagents:

- Chloramine-T solution: 1 gram of Chloramine-T is dissolved in 100 ml of distilled water.
- Pyridine-barbituric acid: 1.5 g of barbituric acid is mixed with 5 mL of water and 7.5 mL of pyridine. The mixture is treated with 1.5 mL of concentrated HCl and diluted to 25 mL.

EVI-7: Oxidizer Screen

The method used is a qualitative examination for the presence of oxidizing materials in liquid, sludge, and solid samples.

- Liquids and Sludges

The procedure for liquid and sludge waste consists of wetting a strip of KI-Starch paper in HCl. The wetted strip is then dipped into the sample. The color change is then noted. If the color turns light brown to dark purple or black, then the result is interpreted as positive, and the waste is managed as an oxidizer. The color is indicative of the type of oxidizer present.

- Solids

The procedure requires that 2 mL of deionized water be added to 11 grams of sample. The mixture is then stirred for 30 seconds. A strip of KI-starch paper is wetted in HCl and then dipped into the slurry. The color change of the KI paper is then noted. If the color turns light brown to dark purple or black, then the result is interpreted as positive and the waste is managed as an oxidizer. The light brown color is indicative of nitric acid while the purple/black color results from the presence of peroxides.

EVI-8: Specific Gravity

The Specific Gravity of a liquid is determined by weighing 10 mL of the sample (at room temperature) and dividing this value by 10. The alternate method of using a hydrometer may be used if sufficient sample is present.

EVI-9: Percent Suspended Solids

Total suspended solids are determined by bringing the sample pH to approximately 3 using 10% sulfuric acid. A determination of the sample's pumpability is made without stirring. The sample must not gel or turn to sludge. The sample is centrifuged for five minutes and the percent solids are calculated.

EVI-10: Chlorine (Spot Test)

A small amount of the sample is placed in a test tube. Litmus paper is placed over the sample as heat is applied. A red coloration of the paper indicates the presence of chlorine. An additional test is done by placing a small amount of the material in a flame on a wire loop. A green color indicates the presence of chlorine.

EVI-11: Polychlorinated Biphenyls Screen

Method SW846-8082 is used to determine PCB content.

EVI-12: Compatibility Testing

Prior to a waste being commingled with other wastes, it is tested to verify compatibility. A representative sample of the waste is mixed with a representative sample of the wastes to be commingled. This is done under controlled conditions by personnel trained regarding chemical reactions.

Representative portions of the wastes to be commingled are mixed together at the same measured temperature to verify compatibility. For example, if a partially full container is to be consolidated into another partially full container, a representative sample is drawn from both containers, the samples are mixed. The mixture is then observed for the following:

- Evolution of gas characterized by bubbling or foaming
- Heat release evidenced by a temperature increase of more than 15 degrees over the measured temperature
- Polymerization of the mixture to an un-pumpable viscosity within 30 minutes
- Miscibility or the formation of layers
- Precipitate formation
- Emulsification

If any of these conditions are observed, the wastes are considered incompatible.

EVI-13: RCRA 8 Metals (totals with digestion)

- Liquids

Methods SW846-6010/7470

- Solids

Methods SW846-6010/7471

EVI-14: Volatile Organic Compounds (totals)

- Liquids

Volatile Organic Compounds – Method SW846-8260C

- Solids

Volatile Organic Compounds (with extraction) – Methods SW846-5035/8260

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APPENDIX A

Example Waste Information Profile (WIP) Form

Waste Information Profile Form



ENPRO Services of Maine, Inc.
 106 Main Street
 S. Portland, ME 04106
 Phone: 207.799.0850 Fax: 207-799-5565
 MED019051069

ENPRO Services of Vermont, Inc
 54 Avenue D
 Williston, VT 05495
 Phone: 802.923.1950 Fax: 802-860-7202
 VTR000517052

Profile #: _____ **Process Code:** _____ **Approval Code:** _____

1. Generator Information:			
Generator Name: _____			
Mailing Address: _____			
City: _____		State: _____ Zip: _____ Phone: _____	
Site Address: _____			
City: _____		State: _____ Zip: _____	
Technical Contact: _____		Phone: _____	
Site EPA ID: _____		NAICS Code: _____	
2. Billing Information:			
Customer Name: _____			
Address: _____			
City: _____		State: _____ Zip: _____	
Billing Contact: _____		Email: _____	
Phone: _____		Fax: _____	
3. Waste Description:			
Common Name of Waste: _____			
Process Generating Waste: _____			
4. Physical & Chemical Properties			
Color: _____ Odor <input type="checkbox"/> None <input type="checkbox"/> Mild <input type="checkbox"/> Strong Describe: _____			
Flash <input type="checkbox"/> <100	BTU/lb	<input type="checkbox"/> Solid	Free Liquids? <input type="checkbox"/> Yes <input type="checkbox"/> No
Point (F°) <input type="checkbox"/> ≥100-140	<input type="checkbox"/> <2000	<input type="checkbox"/> Liquid	_____ % Solids _____ % Liquids
<input type="checkbox"/> ≥140-200	<input type="checkbox"/> 2,000-6,000	<input type="checkbox"/> Sludge	Will waste dump out of drums? <input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> >200	<input type="checkbox"/> >6,000-10,000	<input type="checkbox"/> Semi-solid	Is the waste pumpable? <input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> N/A	<input type="checkbox"/> >10000	<input type="checkbox"/> Powder	Debris?(List type in Section 7) <input type="checkbox"/> Yes <input type="checkbox"/> No
	<input type="checkbox"/> N/A	<input type="checkbox"/> Gas	Is the waste dusty? <input type="checkbox"/> Yes <input type="checkbox"/> No
Specific Gravity	Viscosity	pH	Other Components
<input type="checkbox"/> < 0.8 (Light oil)	<input type="checkbox"/> Low (Water)	<input type="checkbox"/> ≤ 2.0	Total cyanides (ppm) _____
<input type="checkbox"/> 0.8-1.0 (Water based)	<input type="checkbox"/> Med (Pump on)	<input type="checkbox"/> >2.0-5	Total sulfides (ppm) _____
<input type="checkbox"/> > 1.0 (Chlorinated Solvents)	<input type="checkbox"/> High (Molasses)	<input type="checkbox"/> >5-9	PCBs (ppm) _____
<input type="checkbox"/> N/A	<input type="checkbox"/> N/A	<input type="checkbox"/> >9-12.49	Total Halogens /HOC (%) _____
		<input type="checkbox"/> ≥ 12.5	Total VOC (ppm) _____
5. Hazardous Properties: (Check all that apply)			
<input type="checkbox"/> None	<input type="checkbox"/> Radioactive	<input type="checkbox"/> Pyrophoric	<input type="checkbox"/> Oxidizer
<input type="checkbox"/> Water Reactive	<input type="checkbox"/> Dioxins	<input type="checkbox"/> Explosive	<input type="checkbox"/> Medical Waste/Infectious
<input type="checkbox"/> Shock Sensitive	<input type="checkbox"/> Air Reactive	<input type="checkbox"/> Reactive Cyanide	<input type="checkbox"/> Reactive Sulfide
<input type="checkbox"/> Asbestos	<input type="checkbox"/> Benzene NESHP	<input type="checkbox"/> Pesticide/Herbicide	<input type="checkbox"/> Peroxide Forming Compound
6. Regulatory Status (Check all that apply)			
Y N			
<input type="checkbox"/> <input type="checkbox"/> USEPA Hazardous Waste per 40 CFR 261 (If yes list codes) _____			
<input type="checkbox"/> <input type="checkbox"/> Do any state waste codes apply? (If yes list codes) _____			
<input type="checkbox"/> <input type="checkbox"/> Is this waste subject to land ban restrictions ?			
Is this a <input type="checkbox"/> wastewater <input type="checkbox"/> non wastewater			
<input type="checkbox"/> <input type="checkbox"/> If DOO1-D043, are any underlying hazardous constituents (UHC) present			
<input type="checkbox"/> <input type="checkbox"/> Does this waste contain VOC's ≥ 500 ppm (subpart CC)			
Form Code		Source Code	

APPENDIX B

Example Lab Pack Contents Form

APPENDIX C

Standard Operating Procedures for Opening and Sampling Containers

APPENDIX C

Sampling Standard Operating Procedures (“SOP”)

1.1.1 Sampling of Containers

Coliwesas, tubes, drum thieves, and corers are examples of the devices used to sample containers. Samples are taken from locations displaced both vertically and horizontally throughout the waste. For liquids (or liquids with precipitated solids), the sample collector uses a Coliwasa or equivalent. The sampling device is inserted into the container from the top and is pushed down slowly until the bottom of the container is reached. The device is sealed to retain the contents. The contents of the sampling device are then transferred to a polyethylene or glass bottle that is labeled with waste identification information.

A corer or equivalent device is used to sample containers that are solid in nature. These containers are generally filled with dirt and sludges. Several areas from the container are sampled and composited into a jar in order to ensure a representative sample. The sample collector removes a sample that uniformly represents the waste composition of the container (i.e., all layers and phases are represented in the sample).

1.1.2 Sampling of Bulk Material

Bulk solids are sampled using a simple random sampling strategy. The bulk solids container, usually a roll-off box or a dump trailer, is divided into sections. A corer is used in each section to draw a sample from as deep as possible. On occasion, a shovel is used to access lower levels of a bulk container. The samples are composited together so that there is one sample that represents that particular bulk solids shipment.

Bulk liquids are sampled using a Coliwasa or similar device that can sample vertical anomalies. Each compartment of tanker truck is sampled. Compartment samples from the same generator and waste stream will not be composited prior to analysis.

Tank trucks without manways are sampled through a valve. The valve is flushed prior to the sample being drawn.

1.1.3 Debris

Debris is sampled as much as possible; however, not all wastes are amenable to sampling (e.g., universal waste batteries, CRTs, lamps or ballasts, lab packs, etc.). A container of debris often contains a wide variety of materials. For example, it may contain spill absorbent, Tyvek suits, rubber booties, gloves, and paper towels. It may be difficult to obtain a representative sample.

In virtually all situations, debris has one thing in common: non-hazardous materials are contaminated with very small to trace amounts of organic and inorganic hazardous constituents.

1.1.4 Frozen Waste

EVI will not sample waste that is frozen. The container will remain in the receiving area until the waste can be sampled.

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APPENDIX D
Waste Tracking Log

APPENDIX E

Example Chain of Custody Form

APPENDIX F

Example Level I QC Analysis Sheet

Level I QA/QC Report

Date: _____

Time: _____

Initials: _____

Manifest Number: _____

Waste Information Profile (WIP) Number: _____

Number of Drums in Batch: _____

Profile Description of Waste: _____

Description of Waste (Observed): _____

Physical Characteristics/Screen Results: _____

% Liquids	
% Solids	
% Sludge	
Color	
Viscosity	
pH	
Flash Point	
% Fuel*	

Perform a visual inspection on each waste container, including covers and closure devices. Check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position:

Acceptable Unacceptable

If "Unacceptable", explain corrective actions taken:

*Waste containing less than 1% fuel can not be managed under the VHWMR Section 7-204(l) "fuel-to-fuel" exemption (i.e., the waste does not contain a recoverable amount of fuel)

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APPENDIX G

Level II/III Sample Record Log & QA/QC Check List

EVI Level II/III QA/QC Checklist

Sample Date: _____

Generator: _____

Waste Stream (WIP) #: _____

Drum #: _____

If not the 500th container, justification for bypassing: _____

Results of Level II/III Analysis:

Documents to be included in Level II/III WAP file:

1. Copy of Original Manifest _____
2. Copy of Original WIP _____
3. Copy of Level I QA/QC Report _____
4. Original Chain of Custody _____
5. Analytical Results _____

Additional documentation to be included in Level II/III WAP file (if applicable):

1. Revised WIP _____
2. Manifest Discrepancy Letter _____
3. Correspondence with Generator/Customer _____

SECTION D
PROCESS INFORMATION

1.0 INTRODUCTION

ENPRO Services of Vermont, Inc. (“EVI”) owns and operates a commercial waste management facility in Williston, Vermont, where both hazardous and non-hazardous wastes (“waste” or “wastes”) are stored in containers and two 1,000 gallon poly tanks (see **Appendix G** of this section for detailed information on the tanks). EVI does not manage waste in surface impoundments, waste piles, landfills, drip pads or miscellaneous units. EVI also does not operate an incinerator. This section describes the waste management areas of the EVI facility, and how wastes are managed at EVI.

All wastes received at the EVI facility are approved and accepted in accordance with the Waste Analysis Plan (see **Section C** of this permit). The wastes that EVI is permitted to accept are listed in the Part A permit application (i.e., EPA Form 8700-23) included in **Section A** of this permit. After being accepted, all wastes are placed in secondary containment cells (storage cells) located within the EVI facility building.

Some containerized wastes are removed from storage and bulked into roll-off containers (solids) or tank trucks (liquids) for shipment off-site. Other containerized wastes are shipped off-site in the same containers they were received in.

2.0 GENERAL CONTAINER STORAGE AREA INFORMATION

2.1 Facility Overview

The EVI facility consists of one building that includes offices, a laboratory, 15 designated hazardous waste storage cells, an area designated for storing non-regulated materials (e.g., supplies, RCRA-empty drums), and loading docks. The storage cells, which are identified as A-1, B-1, B-2, B-3, B-4, B-5, B-6, C-1, C-2, D-1, D-2, D-3, D-4, D-5, D-6, have a total combined containment volume of 24,570 gallons.

Drug Enforcement Agency (“DEA”) seized hazardous and non-hazardous wastes are stored in a self-contained storage unit maintained in storage cell A-1. The DEA storage unit meets DEA security requirements and is designed with an internal secondary containment system that meets 40 CFR 264.175 requirements (see **Appendix D** of this section for a drawing of the DEA storage unit).

A cabinet designed for storing reactive waste is maintained in storage cell D-6 (see **Appendix E** of this section for a drawing of the “reactives storage cabinet”). Figure

D-1 (see **Appendix A** of this section) identifies the locations of the DEA storage unit and reactivities storage cabinet within the EVI facility.

Non-hazardous wastes are stored in appropriate storage cells.

Storage cell A-1 is used primarily as a temporary staging and processing area for inbound and outbound containerized wastes, a lab pack processing area, a staging area for bulking operations, and on rare occasions an area for off-loading bulk transport vehicles into containers. Two 1,000 gallon poly tanks are used for bulking operations and on occasion for temporarily storing waste off-loaded from bulk transportation vehicles. Only wastes identified by the VT02, VT03, VT08 codes, and compatible non-hazardous waste waters identified by the VT99 code are stored in the two 1,000 gallon poly tanks.

Containers are moved from cell A-1 to an appropriate storage cell or an outbound vehicle, or the contents of the containers are bulked (e.g. into a roll-off, tank truck, or the 1,000 gallon poly tanks). While in storage cell A-1, wastes are managed in accordance with U.S. Department of Transportation (U.S. DOT) compatibility requirements (see **Appendix B** of this section).

2.2 Control of Run-on and Run-off

All wastes are stored inside the EVI building. Some wastes managed by EVI are consolidated (bulked) into bulk containers (e.g. roll-off container) or transport vehicles which are kept closed/tarped except when waste is being added to them. Wastes managed by EVI are therefore not accessible to precipitation and run-on from weather events.

Transport vehicles and roll-off containers used for bulking operations are located outside of the EVI building (in the vicinity of the loading dock) within secondary containment structures. EVI monitors the accumulation of precipitation and run-on into these secondary containment structures to prevent overflow. Accumulated run-on and precipitation is removed periodically and shipped off-site to a proper facility. If there is any reason to believe that collected water is contaminated with hazardous constituents, the water is analyzed/tested for the "RCRA 8" (toxicity characteristic) metals, volatiles, pH and any other likely potential hazardous waste characteristic or contaminant. In addition, a representative sample is collected and analyzed on a semi-annual basis, to verify that a release of hazardous material has not occurred. Documentation of this analysis is included in the facility operating record.

EVI plans to install a roof/canopy over the outdoor secondary containment structures and loading dock area. The roof/canopy will protect the loading dock area and containment structures from precipitation. Runoff from the roof/canopy will be diverted away from the containment structures. Prior to construction of the loading dock and roof/canopy, EVI will submit detailed engineering drawings to the Vermont's Waste Management Division for review/approval. EVI will obtain all the necessary local permits from the Town of Williston prior to initiating work on the roof/canopy structure. A drawing that depicts the location of the proposed roof/canopy and the loading dock area is included in **Appendix F** of this section.

2.3 Description of Containers and Tanks

EVI utilizes containers that meet U.S. DOT specifications for all hazardous materials as defined by 49 CFR 171. In addition, EVI verifies that containers received from off-site meet U.S. DOT standards. All containers are compatible with waste stored in them.

EVI also utilizes two 1,000 gallon poly tanks (see **Appendix G** of this section) that are compatible and suitable for the wastes stored in them (i.e., Only wastes identified by the VT02, VT03, VT08 codes, and compatible non-hazardous waste waters identified by the VT99 code are stored in the two 1,000 gallon poly tanks).

2.4 Description of Container Storage Area

The container storage area is 100-feet wide by 70-feet long (Drawing #Q5281622 is provided as **Figure D-1/Appendix A** of this section). This area is divided into 15 storage cells designated as A-1, B-1, B-2, B-3, B-4, B-5, B-6, C-1, C-2, D-1, D-2, D-3, D-4, D-5, D-6. Several cells are fitted with roller conveyors that serve to facilitate container movement and protect stored containers from contacting spilled liquids.

All storage cells are constructed of concrete that is no less than 12-inches thick at any one point, and surrounded by containment curbing at a height of 6 inches. The concrete storage cells are inspected (see **Section F** of this permit) and maintained to ensure they are kept free of cracks and gaps, and sufficiently impervious to contain leaks and spills until such time that any leaked/spilled material is detected and removed. Only compatible wastes are stored within each individual storage cell.

While at the EVI facility, all transport vehicles holding waste are located within secondary containment structures, and all transport vehicles holding "ignitable" or "reactive" waste are located a minimum of 50' from all property lines.

2.5 Containment System and Storage Volume

Table D-1, below, details the capacity of each storage cell as follows. For each storage cell (column 1), the length of the cell (column 2) is multiplied by the cell width (column 3) and depth (column 4) to determine the gross volume of the cell in cubic feet (column 5). Column 6 identifies the number of 10-foot roller sections in each cell, and column 7 identifies the total volume displaced by the rollers in each cell by multiplying the number of roller sections by the 1.72 ft³ displacement volume of a roller section. Column 8 identifies the total number of 55-gallon drums that can physically fit on the floor area of each storage cell, while column 9 identifies the calculated displacement volume of these drums (Note: 55-gallon drums were used for calculation purposes). Column 10 identifies the maximum number of temporary ramps (these ramps are used to move containers from cell A-1 to other storage cells). Column 11 identifies the total net containment volume. Columns 12 and 13 identify the maximum number of 55-gallon drum equivalents and the total volume of waste (i.e., drum equivalents multiplied by 55) that can be stored in each cell. Containers are presumed to be filled with liquid waste for the purposes of determining containment and storage capacity (i.e., a 55-gallon drum is presumed to contain 55-gallons of liquid waste).

**TABLE D-1
 SUMMARY OF MAXIMUM STORAGE AND CONTAINMENT VOLUMES**

1	2	3	4	5	6	7	8	9	10	11	12	13
Containment Areal	Length (ft)	Width (ft)	Depth (ft)	Gross Volume (ft ³)	Roller Sections (#)	Roller Displacement (ft ³)	Drum Displacement (#)	Drum Displacement (ft ³)	Ramp Displacement (ft ³)	Net Containment Volume (gal)	Max 55 Gallon drums	Max. Gallons
A-1	NA	NA	0.5	1790	0	0	182	286	34	11000	753	41,415
B-1	30	10	0.5	150	6	10.3	0	0	0	1040	120	6,600
B-2	30	4	0.5	60	3	5.2	0	0	0	410	60	3,300
B-3	30	16	0.5	240	9	15.5	0	0	0	1680	180	9,900
B-4	20	10	0.5	100	4	6.9	0	0	0	700	80	4,400
B-5	20	4	0.5	40	2	3.4	0	0	0	270	40	2,200
B-6	20	16	0.5	160	6	10.3	0	0	0	1120	120	6,600
C-1	30	24	0.5	360	12	20.6	0	0	0	2480	240	13,200
C-2	20	24	0.5	240	8	13.7	0	0	0	1690	160	8,800
D-1	30	16	0.5	240	9	15.5	0	0	0	1680	180	9,900
D-2	30	4	0.5	60	3	5.2	0	0	0	410	60	3,300
D-3	30	10	0.5	150	0	0	60	94	0	420	120	6,600
D-4	20	16	0.5	160	6	10.3	0	0	0	1120	120	6,600
D-5	20	4	0.5	40	2	3.4	0	0	0	270	40	2,200
D-6	20	10	0.5	100	0	0	40	63	0	280	80	4,400
TOTALS										24,570	2,353	129,415

Notes:

1. The Column 11 calculation assumes maximum number of 55-gallon containers stacked two levels high that will fit in the storage area.
2. Conversion factor: 1 cubic foot = 7.48 gallons

3.0 CONTAINER MANAGEMENT PRACTICES

3.1 Container Handling Practices

Any container holding waste must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.

3.1.1 Closed Containers

Any container holding waste will be kept closed during storage, except when it is necessary to add or remove waste.

3.1.2 Conditions of Containers

If a container holding waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, EVI will transfer the waste from this container to a container that is in good condition.

3.1.3 Transporting Containers

Containers are moved within the EVI facility utilizing equipment such as forklifts, Bobcats equipped with drum tipping attachments, drum dollies, and lab carts. Employees are trained in the proper use of this equipment and techniques for moving containers to ensure that the containers do not rupture or leak.

3.1.4 Aisle Spacing

To accommodate inspections and the unobstructed movement of material handling and emergency response equipment, aisle space of at least two feet is maintained between rows of containers. Aisle space may be greater than two feet.

3.1.5 Container Stacking

Waste containers may be stacked no greater than two high. When containers are stacked, the containers on the second tier must be palletized (i.e., placed on a pallet that typically measures 4' x 4') and secured with banding.

3.2 Transferring waste from bulk transportation vehicles to containers

On rare occasions, EVI may off-load waste from bulk transport vehicles to U.S. DOT approved containers for storage in the EVI facility. Bulk transport vehicles will be located within concrete secondary containment structures when waste is being off-loaded. Any pumps, fittings, hoses, and hose gaskets used in the off-loading process will be constructed of material compatible with the material being unloaded. To prevent overfilling containers and to ensure that spills do not occur during off-loading operations, EVI personnel will visually monitor all waste transfer operations until completion. When flammable materials are being transferred to containers, the bulk transportation vehicle, transfer equipment and receiving containers will be kept grounded.

Organic emissions that may be generated when wastes are transferred to containers are controlled by attaching an activated carbon filter to the small bung opening on top of the container.

3.3 Transferring waste from containers to bulk transportation vehicles

3.3.1 Bulking liquids (i.e., loading tanker trucks)

Prior to transferring and consolidating liquid waste from containers into bulk transportation vehicles (i.e., tankers), all waste to be consolidated will be tested for compatibility according to the compatibility testing procedure included in the Waste Analysis Plan (see **Section C** of this permit). Bulk transport vehicles will be located within the concrete secondary containment structures throughout loading operations. The transportation vehicles, pumps, fittings, hoses, and hose gaskets will be constructed of material compatible with the material being transferred. Bulk liquid transport vehicles will be equipped with external gauges to allow visual monitoring of the liquid level within the vehicle tank. When flammable materials are being loaded, the bulk transportation vehicle, transfer equipment and receiving containers will be kept grounded throughout loading operations.

3.3.2 Bulking solids (i.e., loading roll-off containers, dump trucks and dump trailers)

Roll-off containers, dump trucks, dump trailers and any other bulk solids transportation container or vehicle will be located within concrete secondary containment structures throughout loading operations. Bulk containers will be equipped with liners that are compatible with any waste material placed in

them. Prior to bulking containers of waste into a bulk solids transportation container or vehicle, each container to be bulked will be weighed, and the gross weight of all bulked wastes will be tallied to ensure that U.S. DOT weight restrictions are met by the fully loaded bulk container or vehicle. Containers of waste to be bulked are typically moved using equipment such as forklifts and Bobcats equipped with drum tippers. After being emptied, containers are righted over the bulk container before being brought back to the loading dock. EVI personnel will visually monitor bulking operations to ensure that the bulk container or vehicle is not overfilled.

3.4 Lab packs

Lab packs are only stored in cells D-3 and D-6, along with other compatible wastes. Lab packs are essentially “double-contained” by design (i.e., a lab pack consists of smaller containers stored within a larger container) and, therefore, further segregation is not required.

Any de-packing or repackaging of lab pack containers may only occur within permitted storage cells. Any packing material removed from lab pack containers is handled in accordance with applicable regulations. Compatible lab pack wastes may be consolidated into a larger container.

3.5 Inspection of Container Storage Areas

EVI conducts daily inspections of container storage areas for the presence of leaking containers and the deterioration of containers and the containment system caused by corrosion or other factors. Inspection logs are maintained as part of the facility operating record. The container storage area inspection procedures, including the EVI inspection checklists, are included in the Procedures to Prevent Hazards section of this permit (see **Section F**).

3.6 Spills and Leaks

Spilled or leaked waste will be removed immediately upon detection by pumping or use of absorbents. A list of spill control equipment is included in the Contingency Plan (see **Section G** of this permit).

3.7 Compatibility

Incompatible wastes/materials will not be placed in the same container or storage cell. A compatibility chart is included as Figure D-2 in **Appendix C** of this section.

Containers of incompatible wastes are separated by concrete berms or the use of other secondary containment devices.

Wastes will not be placed in unwashed containers or tanks that previously held an incompatible waste or material. All wastes are placed in containers that are constructed of materials compatible with the wastes to be stored in them. Only wastes identified by the VT02, VT03, VT08 codes, and compatible non-hazardous waste waters identified by the VT99 code are stored in the two 1,000 gallon poly tanks.

3.8 Container Tracking System

3.8.1 Container Marking and Labeling

Containerized wastes stored within the permitted container storage areas will have the following information either marked on them or affixed to them:

- A completed hazardous waste, universal waste, used oil or a non-hazardous waste label, as appropriate
- An internal tracking label
- If applicable, the date placed in storage for the purpose of meeting Land Disposal Restriction requirements

Lab packs will have a packing list affixed to the outside container that identifies the contents of the lab pack.

All containers of waste shipped off-site are marked and labeled in accordance with applicable U.S. DOT regulations.

3.8.2 Electronic Tracking System

All containers of waste received at the EVI facility are tracked using an electronic tracking system from the time of receipt until shipment off-site. If the electronic system is inoperable, waste containers will be tracked manually.

3.8.3 Container Information Recorded in the Facility Operating Record

The following information is recorded in the facility operating record for each container of waste:

- EVI-assigned container number
- Waste Information Profile (WIP) number
- Uniform hazardous waste manifest number (incoming manifest)
- If applicable, hazardous waste codes (all applicable codes may not be all included on all container tracking documents; all applicable codes are included on WIPs)
- Date of Receipt at the EVI facility
- Date of sampling conducted according to the Waste Analysis Plan included in **Section C** of this permit
- Type of container
- Size, volume or weight of container
- Free liquids present?
- Storage location (i.e, storage cell)

4.0 TANK MANAGEMENT PRACTICES

4.1 Tank Assessment, Installation Inspection and Tightness Test

EVI maintains two 1,000 gallon aboveground double-wall poly tanks in storage cell A-1 for storing wastes identified by the VT02, VT03, VT08 hazardous waste codes, and compatible non-hazardous waste waters identified by the VT99 code. A written assessment, reviewed and certified by a qualified Professional Engineer (“PE”), in accordance with 40 CFR §270.11(d), the applicable requirements of 40 CFR §264.192(a), and Section 7-108 of the Vermont Hazardous Waste Management Regulations, attesting that the tanks have sufficient structural integrity and are acceptable See **Appendix G** of this section for tank design information and the PE assessment.

Prior to placing the tanks in use, the tanks will be tested for tightness, and a qualified Professional Engineer will inspect the tanks according to the applicable requirements of 40 CFR §264.192(b). If a tank is found not to be tight, all repairs necessary to remedy the leak(s) will be completed prior to the tank being placed into use.

4.2 General Operation

Waste is not placed in the tanks if that waste could cause the tank or the containment system to rupture, leak, corrode, or otherwise fail. EVI uses the following controls and practices to prevent spills and overflows from tanks and containment systems:

- (1) Prior to adding waste to a tank (i.e., either from containers or, on rare occasions, from bulk vehicles), the liquid level in the tank will be determined using a measuring stick. The volume of waste in the tank will then be determined using a liquid level conversion chart maintained in the vicinity of the tank.
- (2) At all times, EVI will maintain a minimum of 1 foot of freeboard in each tank to prevent overfilling.
- (3) Both tanks are double-walled and will be located within storage cell A-1 which is secondarily contained.

4.3 Inspections

EVI inspects both tanks each operating day using the inspection checklist included as Appendix A in **Section F** of this permit. At a minimum, these daily inspections will ensure that the tanks are being operated according to their design, and evaluate the construction materials and the area immediately surrounding the tanks to detect corrosion, releases of waste, and signs of releases of waste (e.g., wet spots).

The completed inspection checklists are maintained as part of the facility operating record.

4.4 Tracking

All waste that is bulked into the tanks is tracked using the Bulk Consolidation Tracking Sheet (see **Section C** of this permit). Upon completion, this waste tracking form will be maintained with the facility copy of the outbound manifest as part of the facility operating record.

4.5 Response to Leaks or Spills

- 4.5.1 If a leak or spill from a tank is discovered, or a tank is found to be unfit for use, EVI will immediately remove the tank from use and:

- Determine the cause of the release.
- If necessary, notify/report according to the requirements of the Contingency Plan (see **Section G** of this permit).
- Within 24 hours after detection of the leak or, if the EVI demonstrates that it is not possible, at the earliest practicable time, remove as much of the waste from the tank as is necessary to prevent further release of waste and to allow inspection and repair of the tank.
- If the material released was to a secondary containment system, all released materials will be removed within 24 hours or in as timely a manner as is possible to prevent harm to human health and the environment.
- Immediately conduct a visual inspection of the release and, based upon that inspection:
 - (1) Prevent further migration of the leak or spill to soils or surface water; and
 - (2) Remove, and properly dispose of, any visible contamination of the soil or surface water.

4.5.2 Return to service

If the cause of the release was a spill that did not damage the integrity of the tank, EVI will return the tank to use as soon as the released waste is removed and repairs, if necessary, are made. If the cause of the release was a leak from the tank into the secondary containment system, the tank will be repaired prior to returning the tank to use. If EVI does not satisfy these requirements, the tank will be closed according to the requirements of the Closure Plan included in **Section I** of this permit.

If the repair of a tank is extensive (*e.g.*, installation of an internal liner; repair of a ruptured primary containment or secondary containment vessel), the tank will not be returned to use until EVI obtains a certification by a qualified Professional Engineer in accordance with 40 CFR §270.11(d) and 7-108 of the Vermont Hazardous Waste Management Regulations, that the repaired tank is capable of handling hazardous wastes without release for the intended life of the tank. This certification will be placed in the facility operating record and maintained until closure of the facility.

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APPENDIX A

Container Storage Area Drawing

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APPENDIX B
U.S. DOT COMPATIBILITY CHART

HAZARDOUS MATERIALS LOAD AND SEGREGATION CHART

COMPATIBILITY TABLE FOR CLASS 1 (EXPLOSIVE) MATERIALS														CLASS 1 EXPLOSIVE PLACARDS																																			
COMPATIBILITY GROUP	COMPATIBILITY TABLE FOR CLASS 1 (EXPLOSIVE) MATERIALS													CLASS 1 EXPLOSIVE PLACARDS																																			
	A	B	C	D	E	F	G	H	J	K	L	N	S	DIVISIONS 1.1, 1.2 & 1.3	DIVISION 1.4																																		
A		X	X	X	X	X	X	X	X	X	X	X	X	 <p style="font-size: small;">The Division number and compatibility group are printed in black ink where the '1' is shown. Placard any quantity of Division number 1.1, 1.2 or 1.3 material.</p> <p style="font-size: x-small;">Division Numbers and Compatibility Group</p> <table style="font-size: x-small; width: 100%;"> <tr><td>1.1A</td><td>1.2B</td><td>1.2L</td></tr> <tr><td>1.1B</td><td>1.2C</td><td>1.3C</td></tr> <tr><td>1.1C</td><td>1.2D</td><td>1.3F</td></tr> <tr><td>1.1D</td><td>1.2E</td><td>1.3G</td></tr> <tr><td>1.1E</td><td>1.2F</td><td>1.3H</td></tr> <tr><td>1.1F</td><td>1.2G</td><td>1.3J</td></tr> <tr><td>1.1G</td><td>1.2H</td><td>1.3K</td></tr> <tr><td>1.1J</td><td>1.2J</td><td>1.3L</td></tr> <tr><td>1.1L</td><td>1.2K</td><td></td></tr> </table>	1.1A	1.2B	1.2L	1.1B	1.2C	1.3C	1.1C	1.2D	1.3F	1.1D	1.2E	1.3G	1.1E	1.2F	1.3H	1.1F	1.2G	1.3J	1.1G	1.2H	1.3K	1.1J	1.2J	1.3L	1.1L	1.2K		 <p style="font-size: small;">The compatibility group is printed in black ink, where the '1' is shown. Placard 454 kg (1001 lbs.) or more of 1.4 Explosives.</p> <p style="font-size: x-small;">Compatibility Group</p> <table style="font-size: x-small; width: 100%;"> <tr><td>B</td></tr> <tr><td>C</td></tr> <tr><td>D</td></tr> <tr><td>E</td></tr> <tr><td>F</td></tr> <tr><td>G</td></tr> <tr><td>S</td></tr> </table>	B	C	D	E	F	G	S
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1.1B	1.2C	1.3C																																															
1.1C	1.2D	1.3F																																															
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F	X	X	X	X	X		X	X	X	X	X	X	4/5																																				
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J	X	X	X	X	X	X	X	X		X	X	X	4/5																																				
K	X	X	X	X	X	X	X	X	X		X	X	4/5																																				
L	X	X	X	X	X	X	X	X	X	X	1	X	X																																				
N	X	X	3	3	3	X	X	X	X	X	X	X	4/5																																				
S	X	4/5	4/5	4/5	4/5	4/5	4/5	4/5	4/5	4/5	X	4/5	4/5																																				

§177.848 (g) Instructions for using the compatibility table for Class 1 (explosive) materials are as follows:

- (1) A blank space in the Table indicates that no restrictions apply.
- (2) The letter "X" in the Table indicates that explosives of different compatibility groups may not be carried on the same transport vehicle.
- (3) The numbers in the Table mean the following:
 - (i) "1" means an explosive from compatibility group L, and only be carried on the same transport vehicle with an identical explosive.
 - (ii) "2" means any combination of explosives from compatibility groups C, D, or E is assigned to compatibility group E.
 - (iii) "3" means any combination of explosives from compatibility groups C, D, or E with those in compatibility group N is assigned to compatibility group D.
 - (iv) "4" means §177.835(g) when transporting detonators.
 - (v) "5" means Division 1.4S fireworks may not be loaded on the same transport vehicle with Division 1.1 or 1.2 (Class A explosive) materials.
 - (vi) "6" means explosive articles in compatibility group G, other than fireworks and those requiring special stowage, may be stowed with articles of compatibility groups C, D and E, provided no explosive substances are carried in the same vehicle.
 - (7) Except as provided in paragraph (3) of this section, explosives of the same compatibility group but of different divisions may be transported together provided that the whole shipment is transported as though its entire contents were of the lower numerical division (i.e., Division 1.1 being lower than Division 1.2). For example, a mixed shipment of Division 1.2 (Class A explosive) materials and Division 1.4 (Class C explosive) materials, both of compatibility group D, must be transported as Division 1.2 (Class A explosive) materials.
 - (8) When Division 1.5 (blasting agent) materials, compatibility group D, are transported in the same freight container as Division 1.2 (Class A explosive) materials, compatibility group D, the shipment must be transported as Division 1.1 (Class A explosive) materials, compatibility group D.

HAZARDOUS MATERIALS SHIPPING PAPERS

TO: consignee carrier destination state	FROM: origin origin vehicle number	HAZARD CLASS	I.D. Number	Packing Group	WEIGHT (net or gross)	RATE	LABELS REQUIRED (by exception)
--	--	---------------------	--------------------	----------------------	---------------------------------	-------------	--

Generally, whenever a hazardous material is transported its description must appear on the shipping paper.

The description must adhere to these requirements:

1. If a hazardous material and a non-hazardous material are described on the same shipping paper, the hazardous material must be:
 - a. listed first
 - b. shown in a contrasting color (highlighted on a reproduction)
 - c. identified with an "X" or "RC" before the proper shipping name in the column marked "HM"
2. Entry must be legible and printed in English.
3. Unless specifically authorized or required, the description may not contain codes or abbreviations.
4. Additional information must follow the basic description.
5. If more than one page is required, the first page must indicate such, for example, "page 1 of 4."
6. Shipping paper must show an emergency response telephone number, if required.
7. Shipping paper must contain shipper's certification, if required.

A shipping description must include:

1. proper shipping name (column 2, Hazardous Materials Table)
2. hazard class or division (column 3, Hazardous Materials Table)
3. identification number (column 4, Hazardous Materials Table)
4. packing group (column 5, Hazardous Materials Table)
5. except for empty packages, the total quantity, including unit for measurement, of the hazardous material.

§172.505 PLACARDING FOR SUBSIDIARY HAZARDS





(a) Each transport vehicle, freight container, portable tank, unit load device, or rail car that contains a poisonous material subject to the "Poison-Inhalation Hazard" shipping description of §172.203(m)(3) must be placarded with a POISON INHALATION HAZARD or POISON GAS placard, as appropriate, on each side and each end, in addition to any other placard required for that material in §172.504. Duplication of the POISON INHALATION HAZARD or POISON GAS placard is not required.

(b) In addition to the RADIOACTIVE placard which may be required by §172.504(e) of this subpart, each transport vehicle, portable tank or freight container that contains 454 kg (1001 pounds) or more gross weight of fissile or low specific activity uranium hexafluoride shall be placarded with a CORROSIVE placard on each side and each end.

(c) Each transport vehicle, portable tank, freight container or unit load device that contains a material which has a subsidiary hazard of being dangerous when wet, as defined in §173.124 of this subchapter, shall be placarded with DANGEROUS WHEN WET placards on each side and each end, in addition to the placards required by §172.504.

(d) Hazardous materials that possess secondary hazards may exhibit subsidiary placards that correspond to the placards described in this part, even when not required by this part (see also §172.519(b)(4) of this subpart).

APPENDIX C
RCRA Compatibility

Examples of Potentially Incompatible Waste

Many hazardous wastes, when mixed with other waste or materials at a hazardous waste facility, can produce effects which are harmful to human health and the environment, such as (1) heat or pressure, (2) fire or explosion, (3) violent reaction, (4) toxic dusts, mists, fumes, or gases, or (5) flammable fumes or gases.

Below are examples of potentially incompatible wastes, waste components, and materials, along with the harmful consequences which result from mixing materials in one group with materials in another group. The list is intended as a guide to owners or operators of treatment, storage, and disposal facilities, and to enforcement and permit granting officials, to indicate the need for special precautions when managing these potentially incompatible waste materials or components.

This list is not intended to be exhaustive. An owner or operator must, as the regulations require, adequately analyze his wastes so that he can avoid creating uncontrolled substances or reactions of the type listed below, whether they are listed below or not.

It is possible for potentially incompatible wastes to be mixed in a way that precludes a reaction (e.g., adding acid to water rather than water to acid) or that neutralizes them (e.g., a strong acid mixed with a strong base), or that controls substances produced (e.g., by generating flammable gases in a closed tank equipped so that ignition cannot occur, and burning the gases in an incinerator).

In the lists below, the mixing of a Group A material with a Group B material may have the potential consequence as noted.

Group 1–A

Acetylene sludge

Alkaline caustic liquids

Alkaline cleaner

Alkaline corrosive liquids

Alkaline corrosive battery fluid

Caustic wastewater

Lime sludge and other corrosive alkalis

Lime wastewater

Lime and water

Spent caustic

Group 1–B

Acid sludge

Acid and water

Battery acid

Chemical cleaners

Electrolyte, acid

Etching acid liquid or solvent

Pickling liquor and other corrosive acids

Spent acid

Spent mixed acid

Spent sulfuric acid

Potential consequences: Heat generation; violent reaction.

Group 2–A

Aluminum

Beryllium

Calcium

Lithium

Magnesium

Potassium

Sodium

Zinc powder

Other reactive metals and metal hydrides

Group 2–B

Any waste in Group 1–A or

1–B

Potential consequences: Fire or explosion; generation of flammable hydrogen gas.

Group 3–A

Alcohols

Water

Group 3–B

Any concentrated waste in Groups 1–A or 1–B

Calcium

Lithium

Metal hydrides

Potassium

SO_2Cl_2 , SOCl_2 , PCl_3 , CH_3SiCl_3

Other water-reactive waste

Potential consequences: Fire, explosion, or heat generation; generation of flammable or toxic gases.

Group 4–A

Alcohols

Aldehydes

Halogenated hydrocarbons

Nitrated hydrocarbons

Unsaturated hydrocarbons

Other reactive organic compounds and solvents

Group 4–B

Concentrated Group 1–A or 1–B wastes

Group 2–A wastes

Potential consequences: Fire, explosion, or violent reaction.

Group 5–A

Spent cyanide and sulfide solutions

Group 5-B

Group 1-B wastes

Potential consequences: Generation of toxic hydrogen cyanide or hydrogen sulfide gas.

Group 6-A

Chlorates

Chlorine

Chlorites

Chromic acid

Hypochlorites

Nitrates

Nitric acid, fuming

Perchlorates

Permanganates

Peroxides

Other strong oxidizers

Group 6-B

Acetic acid and other organic acids

Concentrated mineral acids

Group 2-A wastes

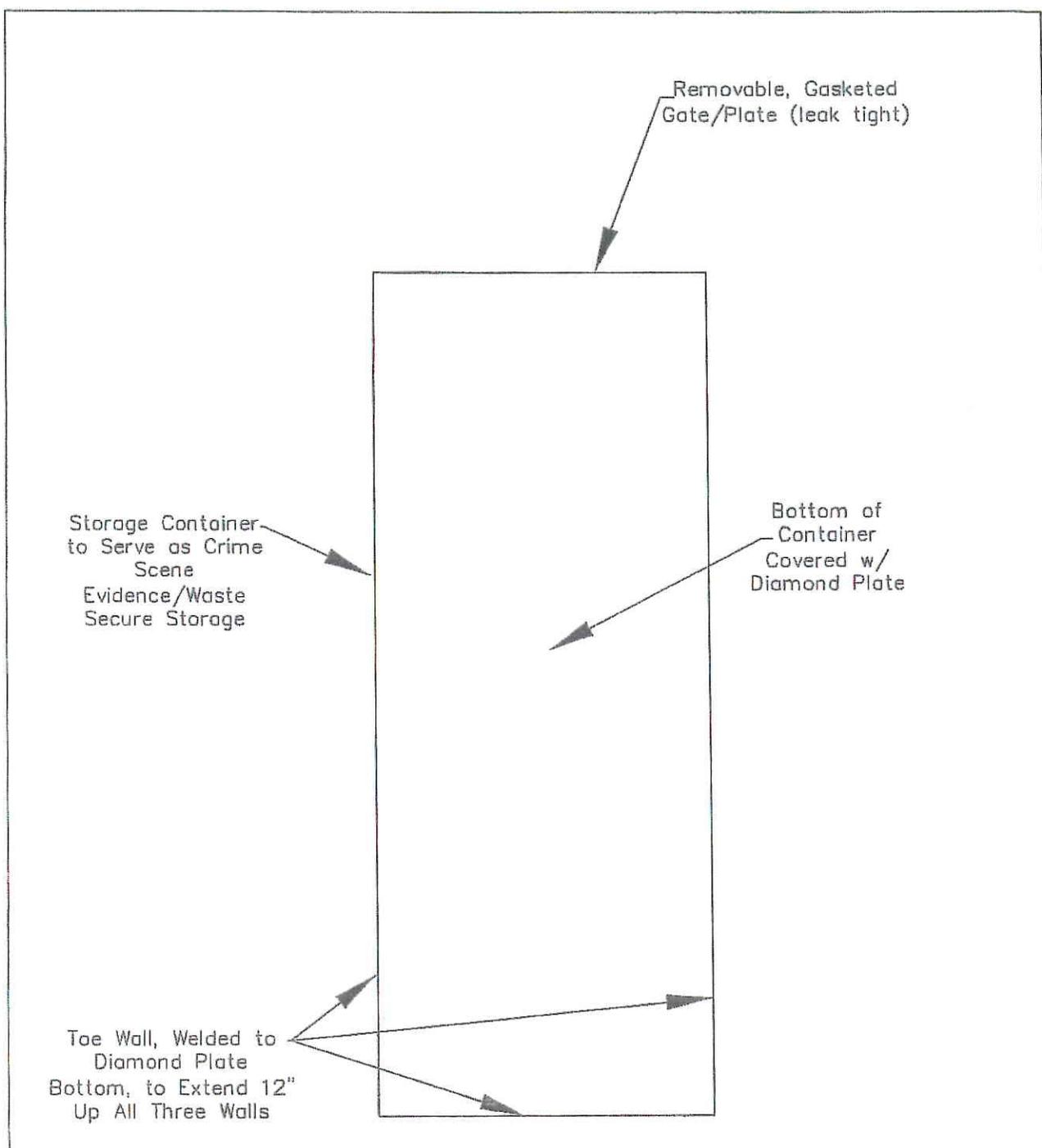
Group 4-A wastes

Other flammable and combustible wastes

Potential consequences: Fire, explosion, or violent reaction.

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APPENDIX D
DEA STORAGE UNIT



Storage Container
to Serve as Crime
Scene
Evidence/Waste
Secure Storage

Removable, Gasketed
Gate/Plate (leak tight)

Bottom of
Container
Covered w/
Diamond Plate

Toe Wall, Welded to
Diamond Plate
Bottom, to Extend 12"
Up All Three Walls

Note:
Spill Containment
volume, with 12" toe
wall, is approximately
1200 gallons

ENPRO Services, Inc.	
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Figure 2 - Secure Storage Container	
Scale: Not to Scale	Date: Dec. 27, 2007
Rev:	Drawn By: RTL
N:\EMI\securedstoragecontainer.dwg	

the size, kind and amount of transportation related equipment necessary to perform the movement of hazardous waste from an authorized removal site to storage and disposal. The contractor shall provide hazardous waste response vehicles dedicated for the purpose of transporting hazardous waste. Response vehicles shall have separate compartments; one compartment for the response crew and one for the hazardous waste. The compartments shall be separated by an industry standard partition.

C.6.10.1 Reserved

C.6.10.2 The Contractor shall provide a 24-hour per day, 7-day per week, 365-day per year, manned telephone number to comply with DOT Regulations and shall include this telephone number on the manifest in box #4 unless otherwise designated by a state requirement.

C.6.10.3 All Contractor vehicles used to transport hazardous waste shall be currently licensed, permitted, or otherwise registered in accordance with federal, state or local laws. The Contractor shall also be responsible for all license, permit and registration fees associated with compliance with the transportation requirements. All DEA contracted vehicles and trailers shall be enrolled in a scheduled maintenance/service program, which provides periodic preventive maintenance, services and checks. In addition, documented evidence of vehicle and trailer scheduled maintenance/services shall be maintained with the vehicle and trailers at authorized response sites and during DEA clandestine waste transportation.

C.6.10.4 The Contractor shall have and maintain no less than a satisfactory safety rating issued by the U.S. Department of Transportation, Federal Highway Administration. The Contractor shall provide copies of renewals to the COTR within 10 days of receipt. *(Copies of existing ratings shall be submitted with the offeror's proposal.)*

C.6.11 Authorization to Handle Hazardous Waste:

The Contractor must be authorized in writing by DEA to handle hazardous waste seized at authorized removal sites that may contain quantities of controlled substances and listed chemicals controlled by federal law, seized at a clandestine drug laboratory by DEA or by state, local, or other Federal law enforcement agencies at an authorized removal site. Any and all such hazardous waste removed from any authorized removal site during the contract period shall remain under the law enforcement exemption from registration, per Title 21 of the Code of Federal Regulations (CFR) 1301.24(a)(1); until final disposal. The provisions of 21 CFR 1301.26(a) (1) applies to activities conducted within the United States and does not include the exportation of controlled substances to other countries. No such hazardous waste containing controlled substances shall be exported to another country. Exportation of any other waste stream shall meet all Environmental Protection Agency (EPA) export requirements and will require written approval from the Contracting Officer's Technical Representative (COTR) prior to exportation.

The Contractor shall not order, supply, analyze, or in any other way conduct

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controlled substance transactions with any DEA registrant unless the Contractor is registered to conduct those activities.

The Contractor shall comply with all physical security requirements no later than 30 days after award of the contract. If any of these requirements cannot be completed within the 30-day period, a written request for an extension of the time limit shall be submitted to the COTR for approval. The request shall explain the need for an extension and provide the anticipated date of compliance. A hazardous waste storage facility shall not be used under any circumstances, until all of the physical security requirements are met and the facility has been approved in writing by the COTR.

C.6.12 Storage of Hazardous Waste. Special consideration is required regarding the secure handling and storage of seized listed chemicals, waste containing controlled substances, and clandestine drug laboratory apparatus.

Any hazardous waste removed from an authorized removal site during the contract period and held by the Contractor, shall remain under the law enforcement exemption per Title 21 of the Code of Federal Regulations (CFR) 1301.24(a)(1) until final disposal.

The Contractor shall provide a secure storage area that meets all federal, state, and local requirements for storage of all RCRA hazardous waste. The area where DEA waste is accumulated must be protected from weather, fire, physical damage and vandals. Hazardous waste must be managed so hazardous waste, or hazardous waste constituents, cannot escape by gravity into soil, into surface water or groundwater, or into drains or sewers and fugitive emissions are not in violation of the air quality provisions. In addition to the waste requirements for accumulation areas, the contractor shall notify the local fire department and their insurance company of the types of waste being stored onsite. The contractor shall be responsible for all licenses, permits, and registration fees associated with compliance with the storage requirements.

The Contractor shall ensure that all hazardous waste is handled as expeditiously as possible. Any and all controlled substances in the Contractor's possession shall be destroyed as soon as possible or as directed by the Case Agent or DEA Representative. Storage time shall not exceed the provisions of the permit for the storage facility.

C.6.13 Physical Security Requirements for Storage of Hazardous Waste. The Contractor shall provide protection against unauthorized access to hazardous waste that is seized at authorized removal sites. The following protective measures are mandatory at all structures and facilities used to store hazardous waste.

- The Contractor shall designate in writing a person who shall be responsible for the physical security and protection of hazardous waste at each storage facility. A copy of the designation shall be maintained at the specified site.
- The perimeter shall be protected to prevent unauthorized entry. The perimeter fence or wall used shall be not less than six (6) feet high, with out-rigged, three-strand barbed wire atop.

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Section C

- If the structure is on a perimeter property line (s), the walls of the structure shall be no less than standard warehouse construction.
- Any and all doors, windows, or other openings shall be protected to prevent unauthorized entry.
- Any and all openings in the perimeter fencing, wall, or building shall be lockable.
- Any and all perimeter fences or walls must be securely attached to the building, or attached to a 3 inch diameter steel fence post filled with concrete, securely buried at least 3 feet in the ground with at least a one-foot diameter concrete anchor, close enough to the building to prevent access between the building and the fence post.
- Any and all access to locks shall be controlled by a written key control and security policy. The Contractor's security policy shall restrict access to necessary management and operating personnel. Additionally, the Contractor shall meet a combination of at least two of the following three physical security requirements before starting work on this contract:
 1. Within the perimeter fencing, a structure or structures designated for storage of hazardous waste shall be lockable and included in the key control policy. For purposes of this contract, "structure" is defined as an area enclosed by metal, masonry, or metal wire screen mesh that extends from true floor slab to true ceiling slab. If used, metal wire screen mesh must meet ASTM Standard A569 for flattened carbon steel, 9-gauge, 3/4 inch center-to-center of short way, diamond pattern.
 2. Within the perimeter fencing, a structure or structures designated for storage of hazardous waste shall have installed an electric intrusion detection system that will provide a signal to a Grade AA supervised, standard secure line (non-encrypted) service at a central monitoring station, with a response time of no less than 15 minutes upon attempted unauthorized entry. Procedures shall be in place to respond and determine if unauthorized access has occurred.
 3. Within the perimeter fencing, a structure or structures designated for storage of hazardous waste shall have installed a closed circuit video monitoring system that provides coverage of all hazardous waste. The closed circuit monitoring system shall be capable of recording all entry into the area at all times. Videotapes shall be maintained for a period of fourteen days. Un-reviewed tapes shall be reviewed no less than once each 48 hours.

C.6.14 Treatment and Disposal: The Contractor shall perform all treatment and disposal services in compliance with federal, state and local treatment and disposal regulations and in accordance with this contract.

The Contractor shall select a Waste Management option from Section C.5, which renders the hazardous waste unusable and unrecoverable, which minimizes the short-term and long-term liability for DEA. Treatment or disposal options other than those listed in Section C.5 must be authorized, in writing, by the COTR prior to using any

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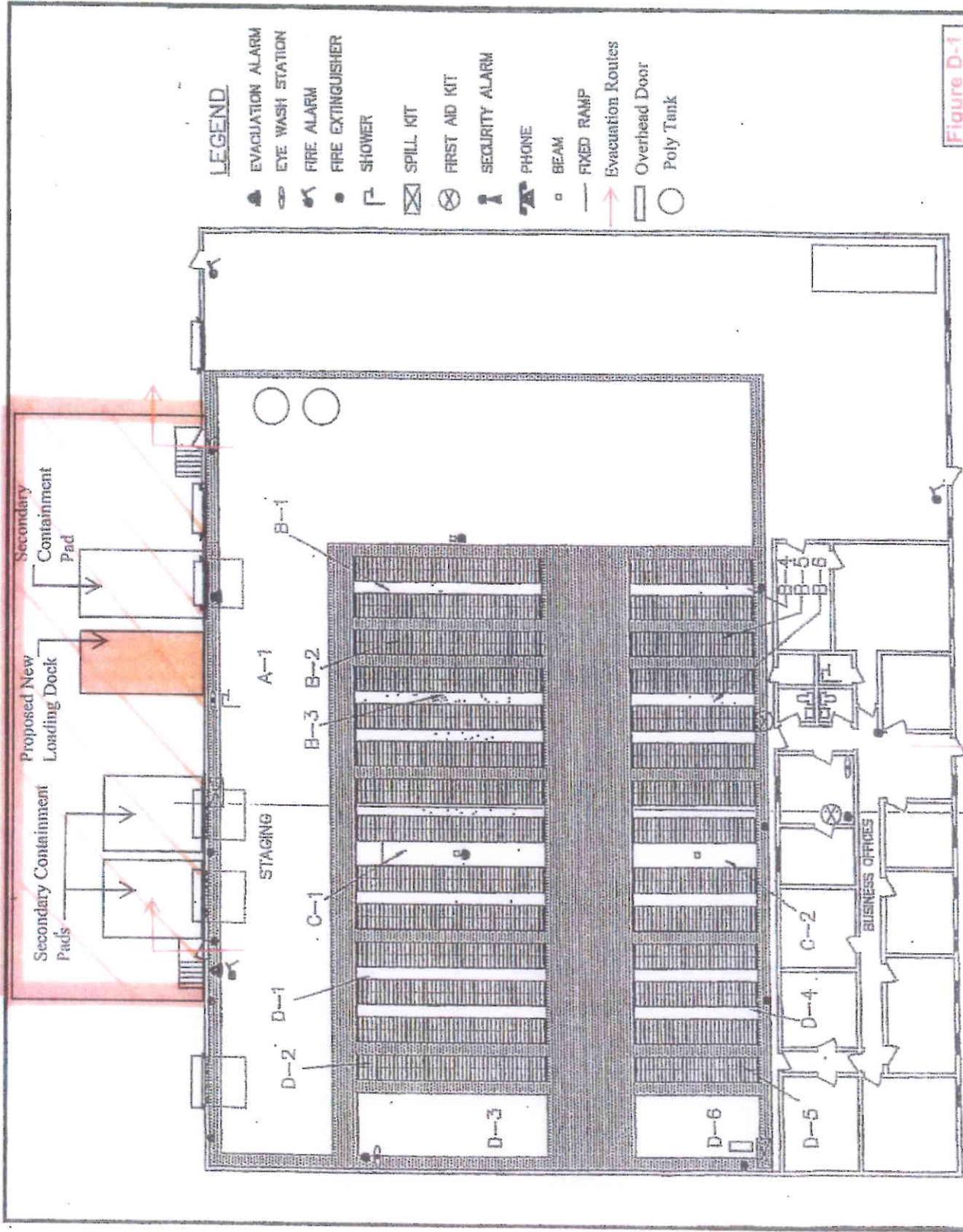
APPENDIX E
REACTIVE STORAGE CABINET

Reactive Storage Cabinet
ENPRO Services of Vermont, Inc.
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Williston, VT



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APPENDIX F
ROOF/CANOPY AND LOADING DOCK DRAWING



LEGEND

- ▲ EVACUATION ALARM
- ☹ EYE WASH STATION
- 🔥 FIRE ALARM
- 🧯 FIRE EXTINGUISHER
- 🚿 SHOWER
- ☒ SPILL KIT
- ⊕ FIRST AID KIT
- 🚪 SECURITY ALARM
- ☎ PHONE
- ◻ BEAM
- FIXED RAMP
- ➔ Evacuation Routes
- ◻ Overhead Door
- Poly Tank

Figure D-1

ENPHO Services of Vermont, Inc.
 FLOOR PLAN
PROPOSED CANOPY & LOADING DOCK
 DRAWN BY: [Name] DATE: [Date] SCALE: [Scale] SHEET NO.: [Number] OF [Total] SHEETS

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 of Vermont, Inc.

Hazardous Waste Facility Permit
ENPRO Services of Vermont, Inc.
EPA ID No. VTR000517052
Process Information
September 2010

APPENDIX G
1,000 GALLON TANKS

April 2, 2010

Mr. Steve Simoes
Vermont Dept. of Environmental Conservation
Hazardous Waste Management Program
One South Building
103 South Main Street
Waterbury, Vermont 05671-0401

**RE: ENPRO Services of Vermont, Inc
Williston, VT - Tank Assessment Letter
54 Avenue D, Williston, VT 05495
CoreStates Project #: ENP-11446**

Dear Mr. Simoes:

CoreStates Group (CoreStates) has completed an assessment of the two (2) 1000-gallon double walled poly aboveground storage tanks (AST) (tank 1 primary serial # V-08-01920 secondary serial # V-08-01921 and tank 2 primary serial # V-08-02073 secondary serial # V-08-01413), manufactured by Poly Processing Company for proposed use at ENPRO's storage facility located at 54 Avenue D, Williston Vermont. Please see details listed below.

During the period between March 2 and March 5, 2010, CoreStates inspected and witnessed a hydrostatic test of the proposed tanks at the ENPRO Services Inc Vehicle Maintenance Facility located at 2 Cary Avenue, Newburyport, MA. Initially the tanks were visually inspected for any signs of damage or stress. They appeared to be in good condition and showed no signs of damage or stress (see attached photos). Following the visual inspection, the primary tanks were filled with water and the level was monitored for a period of 24 hours. There were no visual signs of any leaks and the level remained constant in both tanks during the monitoring period. The interstitial space on both tanks was then filled with water. Shortly after filling the interstitial space, one of the seals on the bellow assembly for both tanks was leaking. ENPRO ordered new bellow assemblies for both tanks. The new assemblies were installed and tanks were re-tested between March 24 and March 26, 2010. The primary and secondary were each monitored for a period of 24 hours. There were no visual signs of any leaks and the level remained constant during the monitoring period.

CoreStates reviewed a letter issued by the tank manufacturer dated March 3, 2010 (attached). Per the manufacturer, the tanks were manufactured from XLPE (high density cross-linked polyethylene). The tank manufacturer has confirmed and approved the tanks for use with the products identified in the letter provided by ENPRO dated March 3, 2010 (attached).

Based on my review of the referenced information, to the best of my knowledge and professional judgment, the AST's are constructed of materials that are compatible with the waste(s) to be placed in the tank system and meet all requirements for their intended use, in accordance with all applicable federal, state and local requirements and/or guidelines.

Also, in addition to the double walled construction of the tanks, they will be located inside the facility within a concrete containment area. Per my conversations with the facility personnel, the entire floor is sealed with a chemical resistant coating and is inspected on a regular basis for cracks in the coating and normal wear and tear. Additionally, daily inspections of the containment area and tanks are conducted and the appropriate inspection logs are maintained on-site (attached). Photos of the proposed location for the tanks have been attached for your reference.

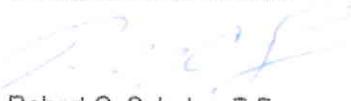
In addition, after reviewing the facility floor plan (attached) detailing the location of the proposed AST's and representative photos of the storage area, I feel that the base is capable of providing support to the AST's, is resistant to pressure gradients above and below the system, and is capable of preventing failure due to settlement, compression, or uplift as so outlined in Title 40 part 264.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions, comments or concerns, please do not hesitate to contact the undersigned at (978) 462-5788.

Sincerely,

CORE STATES GROUP



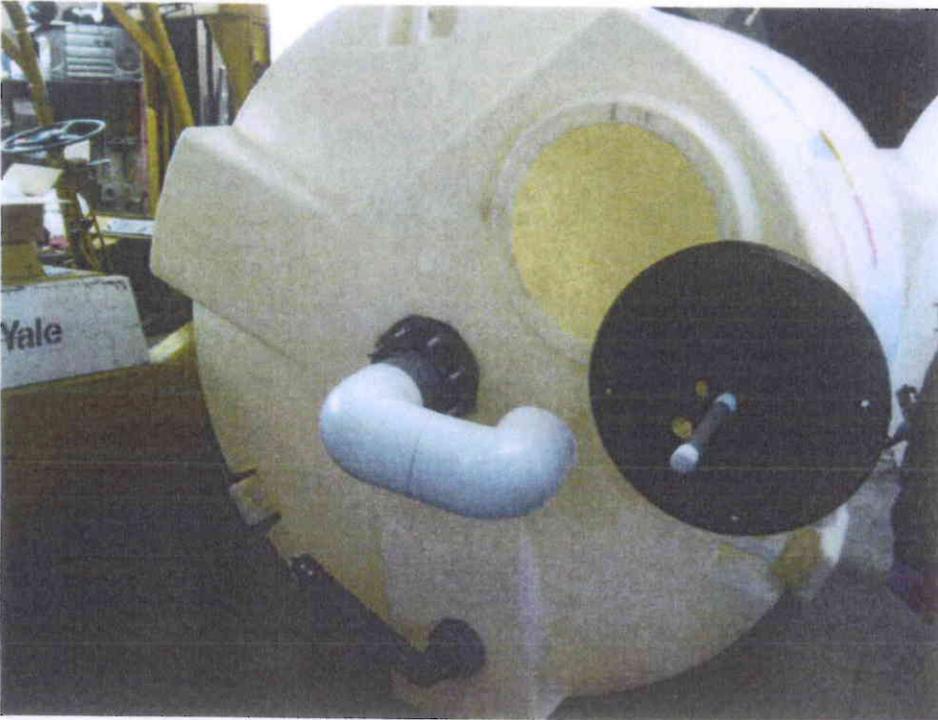
Robert C. Schuler, P.E.
Manager



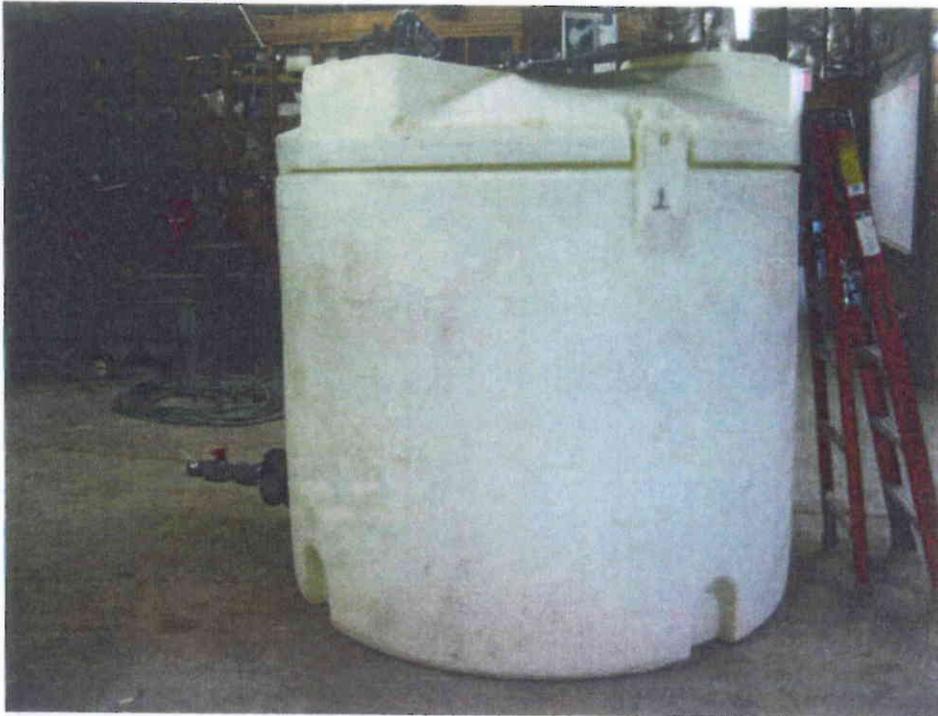
**Existing Tank #1: 1,000 – Gallon Double Walled
Above Ground Storage Tank**



**Existing Tank #2: 1,000 – Gallon Double Walled
Above Ground Storage Tank**



Hydrostatic Testing of Tanks #1 & #2: 1,000 – Gallon Double Walled Above Ground Storage Tanks



Proposed Location of Two 1,000 – Gallon Double Walled
Above Ground Storage Tanks





Mr. Robert Schuler, P.E.
Core States Group
One Harris Street
Newburyport, MA 01950

Subject: Tank Assessment- Two Double Wall 1,000 Gallon Poly Aboveground Storage Tanks (ASTs)

Dear Mr. Schuler

Pursuant to your request regarding the above referenced subject, ENPRO Services of Vermont, Inc. ("EVI") plans to utilize the following double wall storage tanks:

SERIAL NUMBER	TANK NUMBER	DESCRIPTION
V-08-01920	1	Primary
V-08-01921	1	Secondary
V-08-02073	2	Primary
V-08-01413	2	Secondary

The tank manufacturer, Poly Processing Company, have reviewed the intended use of these tanks and has provided written correspondence indicating the types of waste materials that these tanks may be used for storage (See Exhibit 1).

These two (2) Aboveground Storage Tanks AST's will be utilized to store oily (petroleum based) waste waters, non-petroleum water miscible oils, water based paints (e.g. latex) and other aqueous based waste waters that are compatible with these tanks, as described in (Exhibit 2 Compatibility Chart).

If you have any further questions, please do not hesitate to contact me.

Sincerely,

Date

3/5/2010

Daniel F. Trafford
Senior Project Manager
ENPRO Services Inc.
12 Mulliken Way
Newburyport, MA 01950

ENPRO Services, Inc.

31 Waldron Way, Portland, ME 04103
(207) 878-3031 - FAX (207) 878-3043

12 Mulliken Way, Newburyport, MA 01950
(978) 465-1595 - FAX (978) 465-2050

www.enpro.com

Types of liquid waste types that may be stored in the 1,000 gallon poly tanks

1. Oily (petroleum based) waste waters
2. Non petroleum based water miscible oils
3. Water based latex paints
4. Aqueous based waste water with a pH > 2.0 and < 12.5 and flash point > 140 F
5. Storm water, groundwater, surface water and municipal water that may contain trace contaminants below the "Regulatory level" (see below)

Contaminant	Regulatory Level (mg/L)
Arsenic	5.0
Barium	100.0
Benzene	0.5
Cadmium	1.0
Carbon tetrachloride	0.5
Chlordane	0.03
Chlorobenzene	100.0
Chloroform	6.0
Chromium	5.0
o-Cresol	⁴ 200.0
m-Cresol	⁴ 200.0
p-Cresol	⁴ 200.0
Cresol	⁴ 200.0
2,4-D	10.0
1,4-Dichlorobenzene	7.5
1,2-Dichloroethane	0.5
1,1-Dichloroethylene	0.7
2,4-Dinitrotoluene	³ 0.13
Endrin	0.02
Heptachlor (and its epoxide)	0.008
Hexachlorobenzene	³ 0.13
Hexachlorobutadiene	0.5
Hexachloroethane	3.0
Lead	5.0
Lindane	0.4
Mercury	0.2
Methoxychlor	10.0
Methyl ethyl ketone	200.0

Nitrobenzene	2.0
Pentachlorophenol	100.0
Pyridine	³ 5.0
Selenium	1.0
Silver	5.0
Tetrachloroethylene	0.7
Toxaphene	0.5
Trichloroethylene	0.5
2,4,5-Trichlorophenol	400.0
2,4,6-Trichlorophenol	2.0
2,4,5-TP (Silvex)	1.0
Vinyl chloride	0.2

EXHIBIT 1



POLYPROCESSING
SOLUTIONS, SIMPLIFIED.

March 3, 2010

Northeast Fluid Control
348 Park Street Suite 105 East
North Reading MA, 01864

Re: Chemical Compatibility and Testing Requirements for Double Wall Storage Tanks sold to Enpro Services, Inc. The tanks were manufactured from XLPE, gaskets are EPDM and bolts are 316 SS.

Serial No. Tank 1 Primary/V-08-01920
Serial No. Tank 1 Secondary/V-08-01921
Serial No. Tank 2 Primary/V-08-02073
Serial No. Tank 2 Secondary/V-08-01413

See attached form indicating compatibility of the tanks listed and factory compatibility chart. Polyprocessing recommends a 24 hour hydro test prior to usage.

Thank you,

Jason Porter
Customer Support
Poly Processing Company

P.O. Box 4150 * Monroe, LA 71211-4150
Office: (318) 343-7565 * Fax: (318) 343-9679 * www.polyprocessing.com

	YES	NO	N/A
1. Oil (petroleum based) waste waters	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Non petroleum based water miscible oils	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Water based latex paints	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

EXHIBIT 2

CHEMICAL RESISTANCE GUIDE

CHEMICAL	RESIN TYPE	SPECIFIC GRAVITY RATING	FITTING MATERIAL	GASKET MATERIAL	BOLT MATERIAL
Acetic Acid ≤ 80%	XLPE	1.9	PP	EPDM	316SS
Aluminum Sulfate	XLPE	1.65	PVC/CPVC	EPDM	316SS
Calcium Carbonate	XLPE	1.9	PVC/CPVC	EPDM	316SS
Calcium Chloride	XLPE	1.65	PVC/CPVC	EPDM	Titanium
Citric Acid	XLPE	1.65	PVC/CPVC	EPDM	316SS
Deionized Water	XLPE	1.65	PVC/CPVC	EPDM	316SS
Ethylene Glycol	XLPE	1.35	PVC/CPVC	EPDM	316SS
Ferric Chloride	XLPE	1.65	PVC/CPVC	EPDM	Titanium
Ferric Sulfate	XLPE	1.65	PVC/CPVC	EPDM	Titanium
Ferrous Chloride	XLPE	1.9	PVC/CPVC	EPDM	Titanium
Ferrous Sulfate	XLPE	1.65	PVC/CPVC	EPDM	Titanium
Hydrochloric Acid ≤ 37%	XLPE with OR-1000™	1.9	PVC/CPVC	EPDM	C-276
Hydrofluoric Acid	XLPE	1.9	PP	Viton®	C-276
Hydrofluosilicic Acid	XLPE	1.9	PVC/CPVC	EPDM	C-276
Hydrogen Peroxide	XLPE	1.9	PVC/CPVC	Viton®	316SS
Magnesium Chloride 30%	XLPE	1.65	PVC/CPVC	EPDM	Titanium
Phosphoric Acid > 50%	XLPE	1.9	PVC/CPVC	Viton®	C-276
Phosphoric Acid ≤ 50%	XLPE	1.9	PVC/CPVC	Viton®	316SS
Potable Water	HDPE	1.35	PVC/CPVC	EPDM	316SS
Potassium Hydroxide	XLPE	1.9	PVC/CPVC	EPDM	C-276
Sodium Bisulfite	XLPE	1.65	PVC/CPVC	EPDM	316SS
Sodium Carbonate	XLPE	1.35	PVC/CPVC	EPDM	Titanium
Sodium Chlorite	XLPE	1.9	PVC/CPVC	Viton® GF	316SS
Sodium Hydroxide 50%	XLPE	1.65	PVC/CPVC	EPDM	316SS
Sodium Hypochlorite 9%–15%	XLPE with OR-1000™	1.9	PVC/CPVC	EPDM/Viton®	Titanium
Sulfuric Acid ≥ 93%	XLPE with OR-1000™	2.2	PVC/CPVC	Viton®	316SS
Sulfuric Acid 80%–92%	XLPE with OR-1000™	2.2	PVC/CPVC	Viton®	C-276
Sulfuric Acid < 80%	XLPE	1.9	PVC/CPVC	Viton®	C-276

* For more resistance information, including details on other chemicals, visit www.polyprocessing.com and access our Chemical Resistance Online Guide.

Temperature: Product temperature is limited to 100 degrees F. For temperatures from 100 to 150 degrees F, contact Customer Service.

MATERIAL DESCRIPTIONS

Fitting materials:

- PP (Polypropylene) - light, durable pipe or fitting material with outstanding chemical resistance
- PVC (Polyvinyl Chloride) - stronger, more rigid pipe or fitting material with excellent chemical resistance
- CPVC (Chlorinated Polyvinyl Chloride) - stronger, more rigid pipe or fitting material with higher temperature rating

Gasket materials:

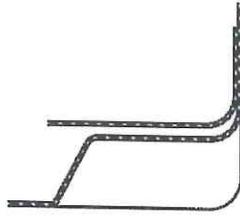
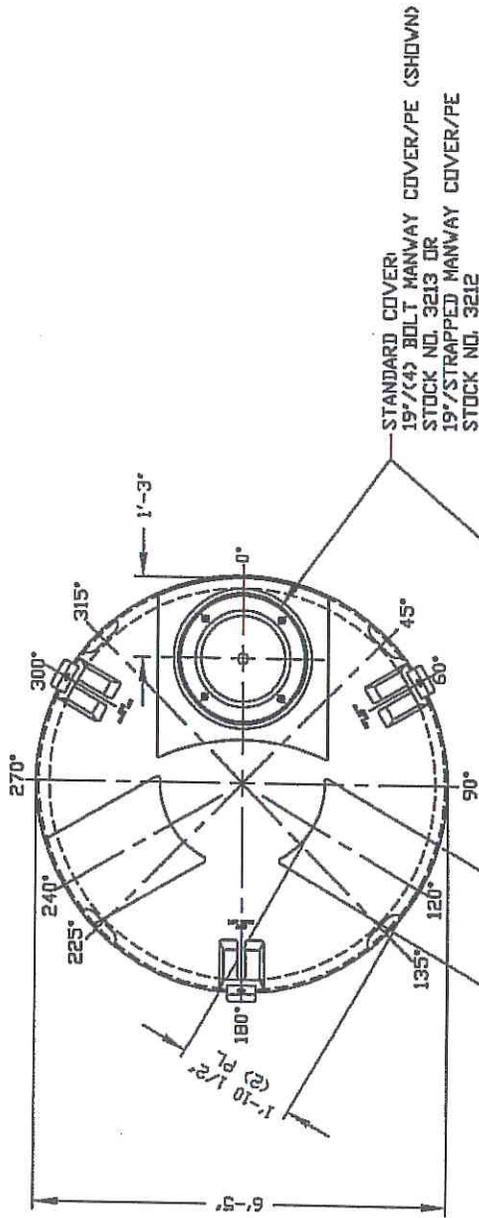
- EPDM (ethylene propylene diene monomer) - good abrasion and tear resistance with excellent chemical resistance
- Viton® (fluorocarbon) - broader temperature and chemical resistance
- Viton® GF/GORE-TEX® - highest temperature resistance

Bolt materials:

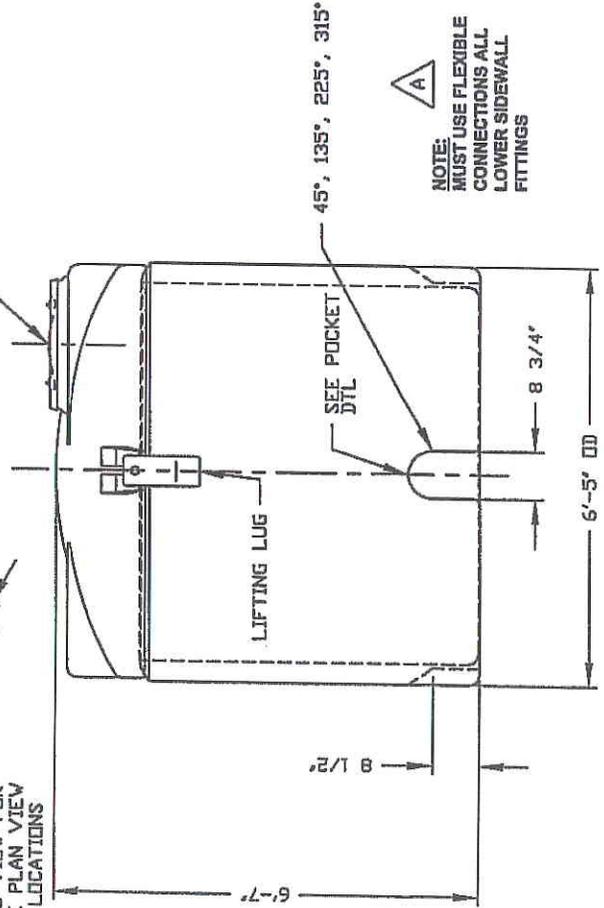
- 316SS (stainless steel type 316) - common alloy used in many storage applications
- Titanium - strong as steel, but half the weight
- C-276 (Alloy C-276) - broader chemical resistance for more difficult storage applications

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 COPY ISSUED ON _____



NOTE: LUGS & POCKETS ROTATED INTO VIEW FOR CLARITY. SEE PLAN VIEW FOR DEGREE LOCATIONS



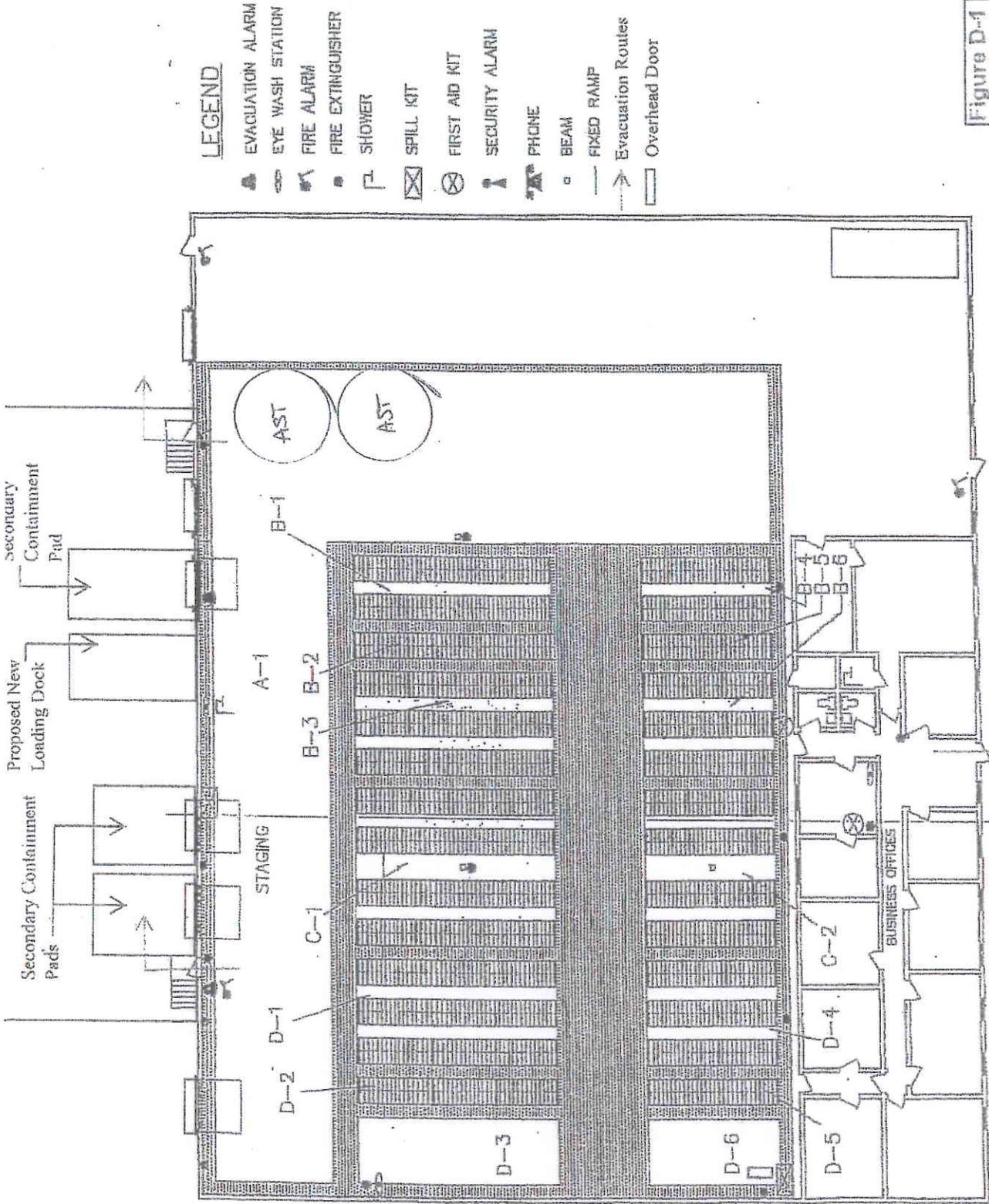
- NOTES:
 1. THIS IS A COMPUTER GENERATED DWG. DO NOT REVISE BY HAND.
 2. DIMENSIONS WILL VARY ±3% DUE TO VARIATIONS IN MULTIPLE MOLDS & CONDITIONS PREVALENT DURING MANUFACTURE & USAGE.
 3. FOR INNER TANK DTLS SEE COMPUTER FILE NO. 2001000, TITLE '1000 GALLON INNER SAFE-TANK' FOR OUTER TANK DTLS SEE COMPUTER FILE NO. 2101200, TITLE '1000 GALLON OUTER SAFE-TANK/1200 GALLON OPEN TOP TANK.'

CALCULATED CAPACITIES/ VOLUME IN U.S. GALLONS	
TANK DESIGN CAPACITY	VOL/TOTAL VOL
INNER	1016
OUTER	1215
	N/A
	1215

CONFIDENTIAL PROPERTY OF
 POLY PROCESSING COMPANY
 NOT FOR REPRINT OR USE
 WITHOUT PERMISSION

DWG TITLE: 1000 GALLON SAFE-TANK ASSEMBLY

SCALE: 1/2"=1'-0"	Central Region	DR: J. BRAUGH
DATE: 1/28/02	POLY PROCESSING Company	CHK: J. BRANTLEY
SHEET: 1 OF 1		REV: 2001000A
COMPUTER FILE		REV: A



LEGEND

- ▲ EVACUATION ALARM
- EYE WASH STATION
- ☒ FIRE ALARM
- FIRE EXTINGUISHER
- ☒ SHOWER
- ☒ SPILL KIT
- ⊗ FIRST AID KIT
- ⚡ SECURITY ALARM
- ☎ PHONE
- BEAM
- FIXED RAMP
- ➔ Evacuation Routes
- ▭ Overhead Door

Figure D-1

ENPRO Services of Vermont, Inc.
 1000 State Street, Suite 100
 Montpelier, VT 05602
 PHONE 802-249-1111 FAX 802-249-1112

FLOOR PLAN



SECTION E
GROUNDWATER MONITORING

Pursuant to 40 CFR Section 264.90(a), ENPRO Services of Vermont, Inc., (EVI) is not subject to groundwater monitoring requirements of 40 CFR Section 264.92. The EVI facility is permitted to store hazardous wastes in containers and tanks, and does not manage hazardous waste in waste piles, landfills, surface impoundments, or land treatment units.

SECTION F
PROCEDURES TO PREVENT HAZARDS

1.0 FACILITY DESIGN AND OPERATION

The ENPRO Services of Vermont, Inc., (EVI) facility is designed, constructed, maintained, and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous constituents to air, soil, or surface water which could threaten human health or the environment.

2.0 SECURITY

All waste storage areas of the EVI facility are located within a secure building. The typical operating hours of the facility are between the hours of 7:30 a.m. and 5:00 p.m. Access to the building by unauthorized persons is limited to a single "main" door that leads to a staffed reception area. Visitors are required to sign-in upon entering the EVI facility and must be accompanied by authorized EVI personnel while on-site. All other points of access to the building are secured by either being kept locked or supervised by EVI personnel. Visitors are required to sign-out upon leaving the facility.

During hours of non-operation, all entrances and exits are locked and the alarm systems are engaged.

The fire alarm system automatically notifies the Williston fire department. The security alarm is monitored by a private security company who notifies the primary emergency coordinator (or his/her alternate) in the event the system is activated.

The EVI fire alarm system consists of:

- Four zone fire panel
- Pull stations (for fire alarm) located near exit doors
- Audible fire alarm horn
- Fixed temperature heat detectors
- Smoke detectors

The EVI security alarm system consists of:

- Eight zone security, key pad, siren driver, transformer, battery back-up
- Passive infrared motion sensors
- Intercom speakers
- Sensor door contacts

Each door leading to waste management areas of the EVI facility has a sign with the legend, "Danger Hazardous Waste Storage Area-Unauthorized Personnel Keep Out," which is legible from a distance of at least 25 feet. The legend is printed in English, which is the predominant language in the area surrounding the facility.

3.0 INSPECTION SCHEDULE

In order to prevent a release of hazardous waste constituents to the environment and a threat to human health, EVI personnel shall inspect the EVI facility according to the schedule included in **Table F-1** (Daily/Weekly Inspection Schedule) and **Table F-2** (Monthly/Annual Inspection Schedule) included in **Appendix A** of this section. In general, EVI's inspection program covers:

Unit	Types of Problems	Frequency
Safety and emergency equipment (e.g., spill kits)	Inventory depletion	Daily
Operating and structural equipment	Deterioration, cracks, gaps, etc.	Daily
Aisle space	Inadequate aisle space, blocked rows	Daily
Containers and two 1,000 gallon poly tanks	Leaking/deterioration	Daily
Monitoring equipment	Malfunction, calibration drift	Monthly, annual
Security devices, safety monitors	Malfunction, calibration drift	Monthly, annual
Containers and equipment used for hazardous waste containing volatile organic compounds	Emission leaks (per 40 CFR 264 Subpart BB and CC-See Section O)	Daily, annually

Any deterioration or malfunction of equipment or structures revealed during an inspection will be corrected such that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action will be taken immediately.

EVI will record inspections in a log (i.e., Tables F-1 and F-2) that is maintained for at least three years as part of the facility operating record.

4.0 REQUIRED EQUIPMENT

All facility communications and alarm systems, fire protection equipment, spill control equipment, and decontamination equipment is tested and maintained as necessary to assure proper operation in time of emergency.

4.1 Communication Equipment

Internal communications and alarm systems used to provide immediate emergency instruction to the facility are described in the Evacuation Plan included in the Contingency Plan (see **Section G** of this permit). An "all-building" page can be announced from any telephone at the EVI facility. Telephones capable of making external calls are located throughout the facility

Whenever hazardous waste is being poured, mixed, spread, or otherwise handled, all EVI personnel involved in the operation have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee.

If there is ever just one employee on the premises while the facility is operating, he or she has immediate access to a telephone capable of summoning external emergency assistance.

4.2 Emergency Equipment

A list of emergency equipment (e.g., fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment) is included in **Appendix C** of the Contingency Plan (**Section G** of this permit).

4.3 Sprinkler Suppression System

The EVI facility is equipped with an automatic sprinkler system that has water supplied in adequate volume and pressure to meet local fire code requirements.

5.0 REQUIRED AISLE SPACE

EVI maintains sufficient aisle space within all waste storage areas (i.e., storage cells) of the facility. Aisle space is maintained to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, or decontamination equipment to any area of the facility.

6.0 ARRANGEMENTS WITH LOCAL AUTHORITIES

EVI has made arrangements to familiarize local police, fire departments, state emergency response teams, emergency response contractors, equipment suppliers and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances the facility, and possible evacuation routes. EVI has also made arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility

If state or local authorities should decline to enter into such arrangements, EVI will document the refusal in the facility operating record.

7.0 PREVENTIVE PROCEDURES, STRUCTURES, AND EQUIPMENT

7.1 Loading, Unloading and Container Handling Operations

Waste loading, unloading and handling procedures wastes are described in the Process Information section (**Section D**) of this permit. All containers of waste are moved using specialized equipment designed to that purpose.

7.2 Run-off, Run-on

Since all waste is stored within containment cells inside the EVI facility, run-on into and run-off from these waste storage areas does not occur. Refer to **Section D** of this permit for a description of how run-on that accumulates in the outdoor secondary containment structures used for transport vehicles and closed/tarped bulk containers (e.g. roll-off container) during bulking operations is managed.

7.3 Power Failures

In the case of a power failure, the facility may have to cease operations, but there would be no threat of a release or endangerment to human health or the environment. The various locations of emergency lighting units within the EVI facility are identified in the Contingency Plan (see **Section G** of this permit).

7.4 Personnel Protective Equipment

EVI attempts to prevent employee exposure to hazardous waste constituents through the use of engineering controls (e.g., ventilation), maintaining standard operating procedures for waste handling, and providing appropriate personal protective equipment. A list of emergency equipment is included in the Contingency Plan (see **Section G** of this permit).

7.5 Minimize Release to the Atmosphere

Releases of hazardous constituents to the atmosphere are minimized by the fact that all wastes are stored in closed containers within the EVI facility. In addition, transport vehicles and bulk containers used for bulking operations (e.g. roll-off containers) are kept closed and are managed in accordance with DOT requirements.

8.0 IGNITABLE, REACTIVE AND INCOMPATIBLE WASTE

8.1 Prevention of Ignition or Reaction

Smoking is allowed in designated outdoor areas only. "NO SMOKING" signs are posted throughout the facility. Any work that involves open flames or other sources of heat (e.g., welding, cutting, etc.) must be accompanied by an EVI-issued hot work permit, pursuant to OSHA 29 CFR 1917.152 standards. Incompatible wastes are segregated, as described in the Process Information section (**Section D**) of this permit.

8.2 General Handling Precautions

The procedures to be followed prior to mixing different waste streams together are specified in the Process Information section (**Section D**) of this permit.

8.3 Management of Containers

Containers of ignitable or reactive waste are located at least 50 feet (15 meters) from the facility's property line (see **Section D** of this permit). Incompatible wastes and materials are not placed in the same container or in unwashed containers that previously held incompatible wastes (see **Section D** of this permit). Inspection and monitoring of containers in accordance with 40 CFR 264, Subpart CC is addressed in the Subpart CC Inspection and Monitoring Plan (**Section O** of this permit).

8.4 Management of Tanks

Ignitable, reactive and incompatible wastes/materials are not managed in the two 1,000 gallon poly tanks maintained at the EVI facility. Only wastes identified by the VT02, VT03, VT08 and VT99 waste codes are stored in the two 1,000 gallon poly tanks.

The 40 CFR 264, Subpart CC inspection and monitoring requirements for tanks are not applicable (i.e., oily water wastes only).

APPENDIX A

TABLE F-1

ENPRO SERVICES OF VERMONT, INC. DAILY / WEEKLY INSPECTION SCHEDULE		Insp Type		Date:	Time:	
		<input type="checkbox"/> Daily	<input type="checkbox"/> Weekly	Name of Inspector:		
				Signature of Inspector:		
Specific Item	Types of Problems	Inspection Frequency	Observations Comments	Action Req'd and Schedule	Date Action Completed	= Pass
Container storage areas	Evidence of spills; cracks; wear; corrosion; other	Daily				
Containers	Leaks; ruptures; corrosion; structural defects	Daily				
Container placement	Inadequate aisle space; No stacking higher than 2 drums	Daily				
Tanks	Evidence of spills; cracks; wear; corrosion; other	Daily				
Tanks Secondary Containment	Leaks; ruptures; corrosion; structural defects	Daily				
Sealing of containers	Open lids or bungs	Daily				
Spill Kits	Missing; not fully stocked	Daily / after each use				
Truck bays; load/unload containment area	Evidence of spills; cracks; wear; corrosion; other	Daily				
Segregation of incompatible wastes	Storage of incompatible wastes in same area	Daily				
Telephone system	Power failure; malfunction	Daily use				
Public address	Power failure; malfunction	Daily use				
Unused Drums & Pails	Low inventory; wrong type	Weekly				
Emergency showers & eye wash stations	Low/no water pressure; clogged	Weekly				
Self contained breathing apparatus	Low air pressure; deteriorated or missing parts; cylinder past	Weekly / after each				
Fire extinguishers	Needs recharging; missing; wrong type	Weekly / after each				

TABLE F-2

ENPRO SERVICES OF VERMONT, INC. MONTHLY/ANNUAL INSPECTION SCHEDULE		Insp Type		Date:	Time:	
		<input type="checkbox"/> Monthly	<input type="checkbox"/> Annual	Name of Inspector:		
				Signature of Inspector:		
Specific Item	Types of Problems	Inspection Frequency	Observations Comments	Action Req'd and Schedule	Date Action Completed	= Pass
Door locks	Malfunction	Monthly				
Heat sensors	Power failure; malfunction	Monthly				
Ventilation Hoods	Blockage; low flow; fan inoperable	Monthly				
Emergency Lighting	Battery low; malfunction	Monthly				
Spark Proof Flash Light	Missing; not charged; bad bulb	Monthly				
Warning Signs	Missing; obstructed	Monthly				
Neutralizing Agent	Missing; low inventory	Monthly				
Direct reading instruments, Oxygen meter, PID meter	Out of calibration, sensor depleted, low battery, missing, damaged	Monthly				
Medical & first aid supply	Low inventory, missing items	Monthly				
Booms and pads	Missing, low inventory	Monthly				
Clay Absorbents	Missing, low inventory	Monthly				
Spark proof shovels	Missing	Monthly				
Diesel compressor	Will not start, dead battery, spark plugs fouled, low fuel	Monthly				
Security System alarm	Malfunction, turned off	Annual				
Fire & Evacuation alarms	Power failure, malfunction	Annual				
Containers - If on-site > 1 year and contains > 500 ppm volatile organic compounds	Perform visual inspection of covers & closure devices. Check for visible cracks, holes, gaps, or other open spaces into interior of container when the cover and closure devices are secured in the closed position	Annual				

SECTION G
CONTINGENCY PLAN

1.0 INTRODUCTION

This contingency plan ("Plan") is designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.

The provisions of this plan are carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

2.0 EMERGENCY COORDINATORS

At all times, there is at least one employee either on the ENPRO Services of Vermont, Inc., (EVI) facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. The emergency coordinator is thoroughly familiar with all aspects of this plan, all operations and activities at the facility, the location and characteristics of waste handled by EVI, the location of all records within the facility, and the facility layout. In addition, the emergency coordinator has the authority to commit the resources needed to carry out the contingency plan.

During an emergency, the emergency coordinator takes all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include stopping operations, collecting and containing release waste, and removing or isolating containers.

If the facility stops operations in response to a fire, explosion, or release, the emergency coordinator monitors for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

The emergency coordinators are as follows:

EMERGENCY COORDINATORS

Primary

Jeff Baker
321 Dorset Street
So. Burlington, VT 05403

Alternate

Jeff Frederick
272 Carroll Hill Road
Fairfax, VT 05454

Telephone Numbers

Office (802) 860-1200
Cell (802) 366-0534
Home (802) 863-7828

Office (802) 860-1200
Cell (978) 815-5671
Home (802) 849-9819

3.0 EMERGENCY PROCEDURES

3.1 Emergency Response Procedures

In response to an imminent or actual emergency situation (i.e., in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility), the facility employee who first becomes aware of this type of situation, implements the emergency response procedures included in **Appendix B** of this section. Spill Reporting Guidelines are included in **Appendix C** of this section.

3.2 Evacuation Procedure

Whenever an imminent or actual emergency situation arises and a need to evacuate personnel from the facility is determined, the emergency coordinator initiates the following evacuation procedures by voice communication, PA system, and/or by the activation of the facility evacuation alarm. (Note: Facility personnel are trained in emergency evacuation action procedures, evacuation routes, and reassembly points). The Williston Fire Department is notified in the event that a facility evacuation occurs. The emergency coordinator will immediately notify the Williston Fire Department and the Vermont State Police if evacuation of local areas may be advisable.

In an emergency, all persons are to be evacuated from the facility and assembled on the lawn across Avenue D (next to the USPS mailbox). All employees leaving the building will assemble in this area. Employees should not leave the assembly area, nor should they leave the scene in their vehicles without the permission of the emergency coordinator. Supervisors must ensure all personnel are accounted for. The primary evacuation route is through the front of the building for office personnel and through the bay doors in the storage area (See map included in **Appendix E** of this section). Secondary routes would be through the front office area entrance (See **Appendix E**).

Exits and evacuation maps are clearly marked and posted throughout the facility.

EVI conducts evacuation drills once annually according to the Personnel Training Plan (**Section H** of this permit).

3.3 Reporting

If the emergency coordinator determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside the facility or the Contingency Plan is implemented, the emergency coordinator reports his/her findings as follows:

- Immediately notify the Williston Fire Department/Police at (802) 878-2200/ (802) 878-6611, ENPRO Services, Inc., and , and will be available on site to assist the appropriate officials in decisions pertaining to evacuation of local areas
- Immediately notify the Department of Public Safety, (800) 641-5005

- Immediately notify appropriate state or local agencies and contractors with specific response roles (see **Appendix A** for a list of emergency contacts)
- Notify the National Response Center, (800) 424-8802, with the following information:
 - (i) Caller's name and telephone number
 - (ii) Facility name, address and telephone number
 - (iii) Time and type of incident
 - (iv) Name (type) and quantity of material(s) involved, to the extent known
 - (v) Extent of any injuries, if any
 - (vi) Possible hazards to human health or the environment outside the facility
- Ensure that non-emergency personnel from the facility do not leave the designated assembly area or return to the scene of the emergency without obtaining permission from designated response personnel.

3.4 Emergency Equipment

The emergency equipment located at the EVI facility is listed in **Appendix D** of this section. Any equipment used during the initial response to an emergency or other remediation efforts, is checked, cleaned, replaced and otherwise made fit for its intended use prior to the resumption of operations. The emergency coordinator is responsible for verifying emergency preparedness by arranging for the repair and/or replacement of equipment as deemed necessary after inspection.

3.5 Post-Emergency Procedures

Immediately after an emergency, the emergency coordinator provides for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.

The emergency coordinator must ensure that, in the affected area(s) of the facility:

1. No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and
2. All emergency equipment listed in **Appendix D** is cleaned and fit for its intended use before operations are resumed.
3. Note in the facility operating record the time, date, and details of any incident that requires implementing the contingency plan (the form included in **Appendix F** of this section is used to document implementation of the contingency plan). Within 10 days after the incident, a copy of completed form is submitted to the Director of the Vermont Waste Management Division.

4.0 ARRANGEMENTS

The facility has made the following arrangements, as appropriate, for the types and quantities of wastes handled at his facility (See **Appendix H** of this section) and the potential need for the services of these organizations:

1. Arrangements to familiarize the Williston police and fire departments, and emergency response contractor (e.g., ENPRO Services, Inc.) with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to the facility, and possible evacuation routes;
2. The Williston Police and Fire Departments are designated as the primary emergency authority; EVI has an agreement with ENPRO Services Inc. to provide emergency response services to support the primary emergency authorities;
3. Agreements with County and State of VT emergency response teams; VT Department of Environmental Conservation Emergency Management, VT Department of Public Safety and Chittenden Emergency Planning Committee; and
4. Arrangements to familiarize Fletcher Allen Health Care with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

Where State County or local authorities decline to enter into such arrangements, this refusal is documented in the facility operating record.

The contact information for the above local, county, state, federal and private emergency response officials/contractors is included in **Appendix A** of this section.

5.0 PLAN DISTRIBUTION

A copy of the contingency plan and all revisions to the plan is:

- (a) Maintained at the facility; and
- (b) Submitted to the Williston police and fire departments, Fletcher Allen Health Care, and State and local emergency response teams that may be called upon to provide emergency services (See **Appendix G** of this section).

6.0 PLAN AMENDMENTS

The contingency plan is reviewed, and immediately amended, if necessary, whenever:

- (a) The facility permit is revised;
- (b) The plan fails in an emergency;

(c) The facility changes – in its design, construction, operation, maintenance, or other circumstances – in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;

(d) The list of emergency coordinators changes; or

(e) The list of emergency equipment changes.

APPENDIX A

EMERGENCY COORDINATORS/CONTACTS

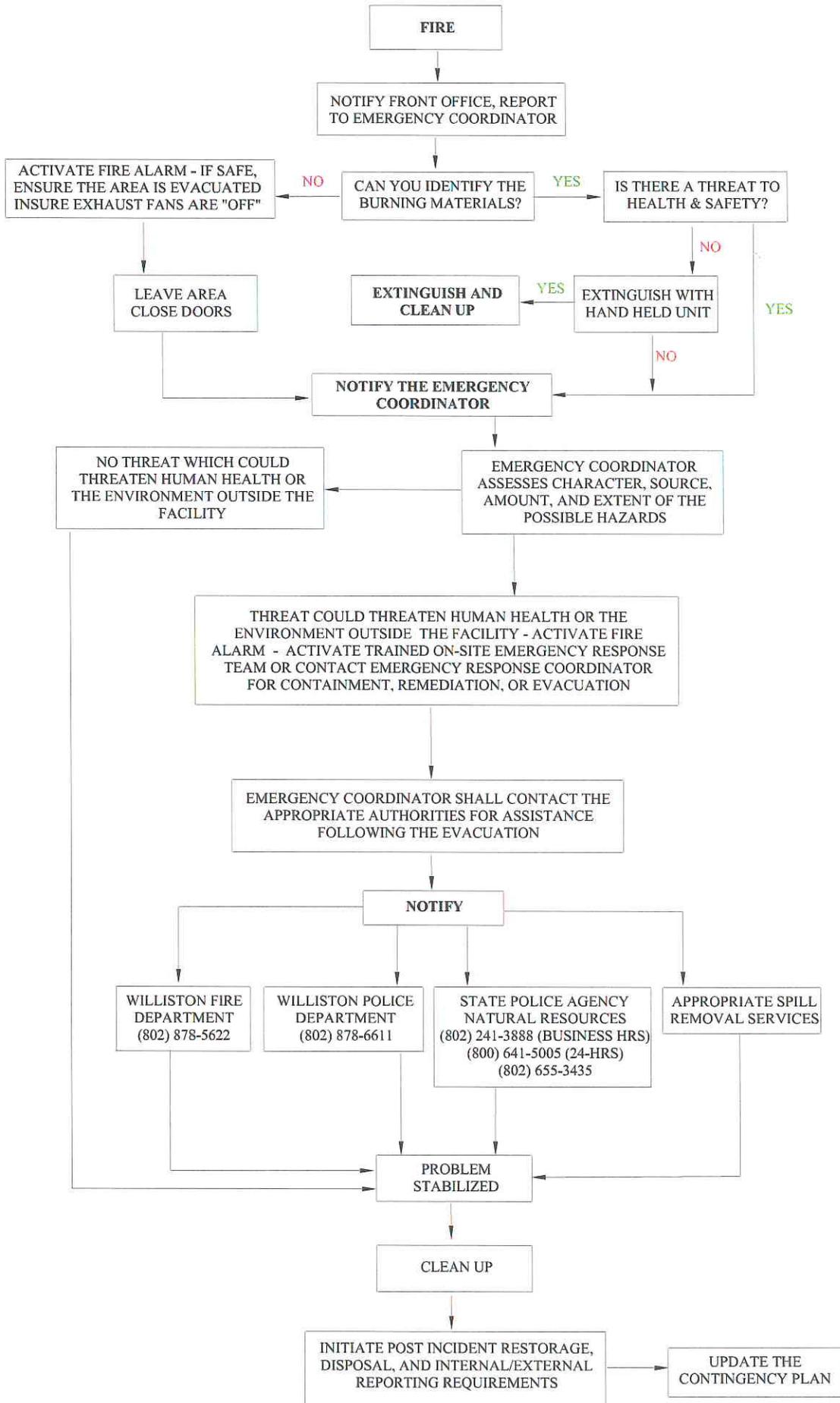
APPENDIX A

EMERGENCY COORDINATORS/CONTACTS	Telephone Numbers
Primary Emergency Coordinator	
Jeff Baker 321 Dorset Street So. Burlington, VT 05403	Office (802) 860-1200 Cell (802) 366-0534 Home (802) 863-7828
Alternate Emergency Coordinator	
Jeff Frederick 272 Carroll Hill Road Fairfax, VT 05454	Office (802) 860-1200 Cell (978) 815-5671 Home (802) 849-9819
Emergency Response Contractor	
ENPRO Services, Inc. 2 Flynn Ave Burlington, VT 05401	(800) 966-1102 (24-hours)
Emergency – Fire, Police, Ambulance (911)	
Chittenden Emergency Planning Committee	(802) 656-5405
Williston Fire Department	(802) 878-5622
Williston Police Department	(802) 878-6611
Department of Environmental Conservation; Waste Management Division	(802) 241-3888
Vermont Department of Public Safety (24-hours)	(800) 641-5005
State Police	(802) 655-3435 or (802) 878-7111
National Response Center	(800) 424-8802
Chemtrec	(800) 424-9300
Fletcher Allen Health Care	(802) 656-2345

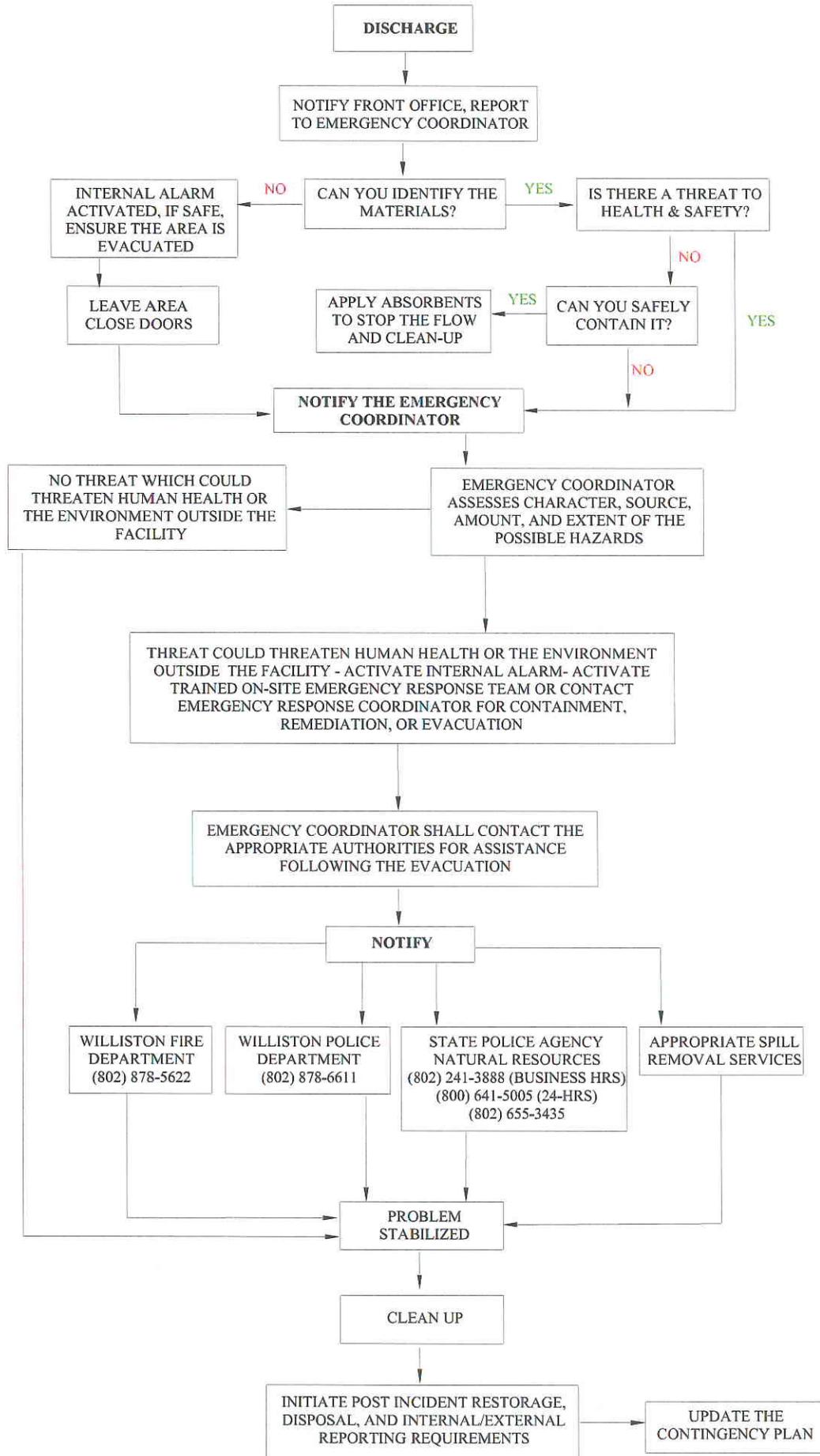
APPENDIX B

FIRE AND DISCHARGE PROCEDURE FLOW CHARTS

APPENDIX B - FIRE PROCEDURES FLOW CHART



APPENDIX B - DISCHARGE PROCEDURES FLOW CHART



APPENDIX C
SPILL REPORTING GUIDELINES

APPENDIX C - SPILL REPORTING GUIDELINES

Determine extent/quantity of release and immediately contact the Waste Management Division (Monday- Friday 7:45 AM-4:30 PM) or the Department of Public Safety, Emergency Management Division if:

- ~ A discharge of hazardous waste or release of a hazardous material exceeds 2 gallons;
- ~ A discharge of hazardous waste, or release of hazardous material is ≤ 2 gallons and poses a potential or actual threat to human health or the environment: or
- ~ A discharge of hazardous waste, or release of hazardous material equals or exceeds its corresponding reportable quantity under CERCLA, as specified under 40 CFR 302.4

APPENDIX D
EMERGENCY EQUIPMENT

APPENDIX D- Emergency Equipment

The equipment described below is available for emergency response use by employees who have taken a 40-hour OSHA training course in Hazardous Waste Operations and Emergency Response.

Pads, Booms, and Speedi-Dri. Pads, booms, and Speedi-Dri will be used to limit the flow of spilled material and localize the response effort. They will be deployed in front of the spill. These materials may also be used to absorb spilled liquids. If contaminated, the material will be disposed of as hazardous waste. These materials are available in the spill kits and in the equipment supply area.

Tyveks, Yellow and White. White Tyveks are available for use in response situations where minimal protection to the individual and his clothing is required. These items are stored in the equipment supply area. Yellow chemically resistant Tyveks are available for use in response to emergencies when more protection is required. These garments offer protection to the individual and his clothing. Yellow Tyveks are part of the proper attire where Level B protection is required. Tyveks are available in the spill kits and the equipment supply area.

Gloves. Gloves are available for emergency response procedures. This form of protection must be used whenever the potential for direct skin contact exists when handling hazardous waste or hazardous materials. Gloves are to be selected according to the chemicals spilled. It is recommended that surgical gloves be worn under outer gloves to provide additional protection. A glove selection chart is posted in the facility. Gloves are available in the spill kits and in the equipment supply area.

Boots. Disposable boots are to be used when protective footwear is required beyond that which the employee is already wearing. Disposable boots are available in the spill kits and in the equipment supply area. If additional protection is required heavy duty chemical resistant boots are available in the equipment storage area.

Goggles & Safety Glasses. Goggles or safety glasses are to be worn at all times in the facility. Goggles are to be used when the potential for dust, debris, and splashes warrants more protection than is afforded by safety glasses. Use of full-face respirators and SCBA equipment may supplant the requirements for the use of goggles. Additional goggles and safety glasses are available in the spill kits, and in the equipment supply area.

Spark-Proof Shovels. Spark-proof shovels are available for use in cleaning up contaminated absorbent materials and hazardous waste. In addition to the shovels in use throughout the facility, spark proof shovels are available in the equipment storage area.

Containers & Liners. Pails, drums, boxes and specialty containers are available for storage of contaminated debris and hazardous waste resulting from emergency response activities. Overpack drums are available to provide secondary containment for leaking drums and are located in the drum storage area and at the spill kit locations. 6 mm drum liners are available in the spill kits and in the equipment storage area to prevent materials from reacting with their containers.

Sample Vials. Sample vials and jars are available in the equipment storage area and will be used when the precise chemical nature of the spill debris is unknown.

pH Paper. pH paper is available for use when the corrosivity of spill debris is in question. The pH paper is available in the equipment supply area and the QC area.

Labels. Labels are to be used to identify any containers used to store hazardous waste, including contaminated debris following an emergency. Labels are available in the QC area and in the equipment supply area.

Face Shields. Face shields may be used in place of safety goggles. Face shields are stored in the equipment storage area.

Hard Hats. Hard hats are available for use when the potential for an overhead hazard exists. Hard hats are stored in the equipment storage area.

Acid Suits. Acid suits are available for use in response to acid spills. The suits are stored in the equipment supply area.

SCBA. SCBA are available for use in any situation that is potentially immediately dangerous to life and health, including situations where the chemical hazard is unknown, or where confined space entry may be required. Both SCBA's are available in the changing room. Use of the "buddy system" is mandatory.

Flashlight. A spark-proof flashlight is available for use when portable illumination is required. This light is stored in the operations manager's office (center office – facility side).

Explosion-Proof Vacuum, Drum Head Vacuum, Broom, and Dust Pans. These items may be used to clean up hazardous debris resulting from a spill. They are stored in the equipment storage area.

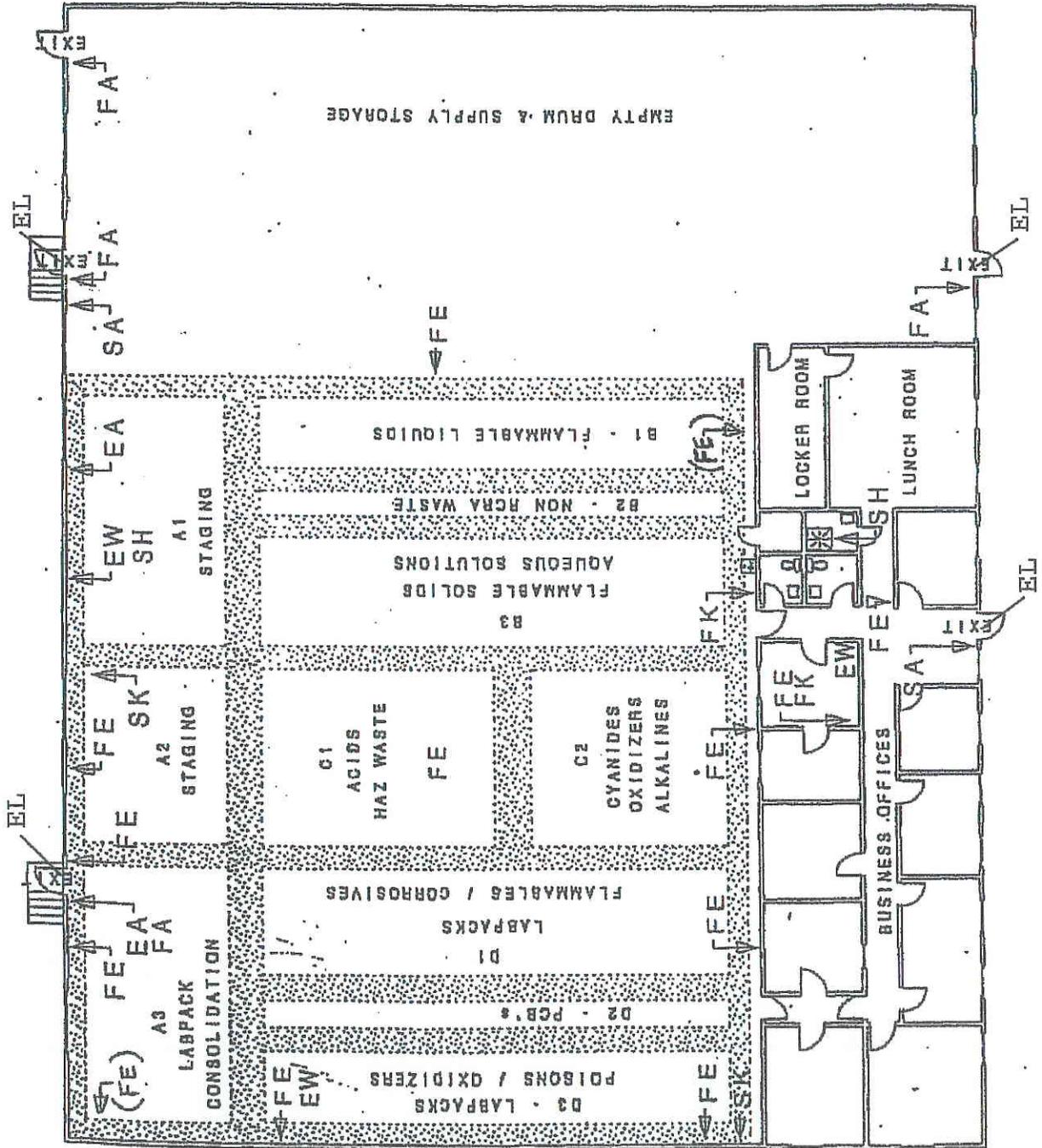
Hazard Identification Tape. This tape is available for marking an area where emergency response operations are ongoing. The tape may be used to limit access to such an area. Hazard Identification Tape is located in the equipment storage area.

Direct Reading Instruments. Direct reading instruments are available for analyzing an environment where a spill has occurred. These devices include a combustible gas meter to detect the presence and level of explosive gases in the environment and a photo-ionization detector for measuring ionization potential.

List of Emergency Equipment

Unit	Location
Fire extinguisher, ABC, 20 lbs.	Left of truck bay door 6
Fire extinguisher, ABC, 20 lbs.	Wall between D-3 and A
Fire extinguisher, ABC, 20 lbs.	Wall by D-6
Fire extinguisher, ABC, 20 lbs.	Office wall next to management access
Fire extinguisher, ABC, 20 lbs.	C-1 middle
Fire extinguisher, ABC, 20 lbs.	Truck bay wall opposite D-1
Fire extinguisher, D, 30 lbs.	Left of truck bay door 5
Fire extinguisher, ABC, 20 lbs.	Between truck bay door 4 and 5
Fire extinguisher, ABC, 20 lbs.	Beam B-1
Fire extinguisher, ABC, 5 lbs.	Reception area
Fire extinguisher, ABC, 20 lbs.	Office wall near C-2
Fire extinguisher, ABC, 20 lbs.	Office wall near B-4
Fire extinguisher, ABC, 10 lbs.	Lab near sink
Pads, booms, and speedi-dry	Supply racks
Tyveks	PPE supply shelf
Gloves	PPE supply shelf
Disposable boots	PPE supply shelf
Goggles and safety glasses	PPE supply shelf
Spark-proof shovels	Supply storage area
Containers & liners	Supply storage area/supply trailer
Face shields	PPE supply shelf
Hard hats	Supply storage area/conference room
Drum vacuum, broom & dust pans	Supply storage area
Hazard identification tape	Supply storage area
SCBA	Changing room
Flashlight	Operation manager's office
Direct reading instruments	Lab/Supply storage area

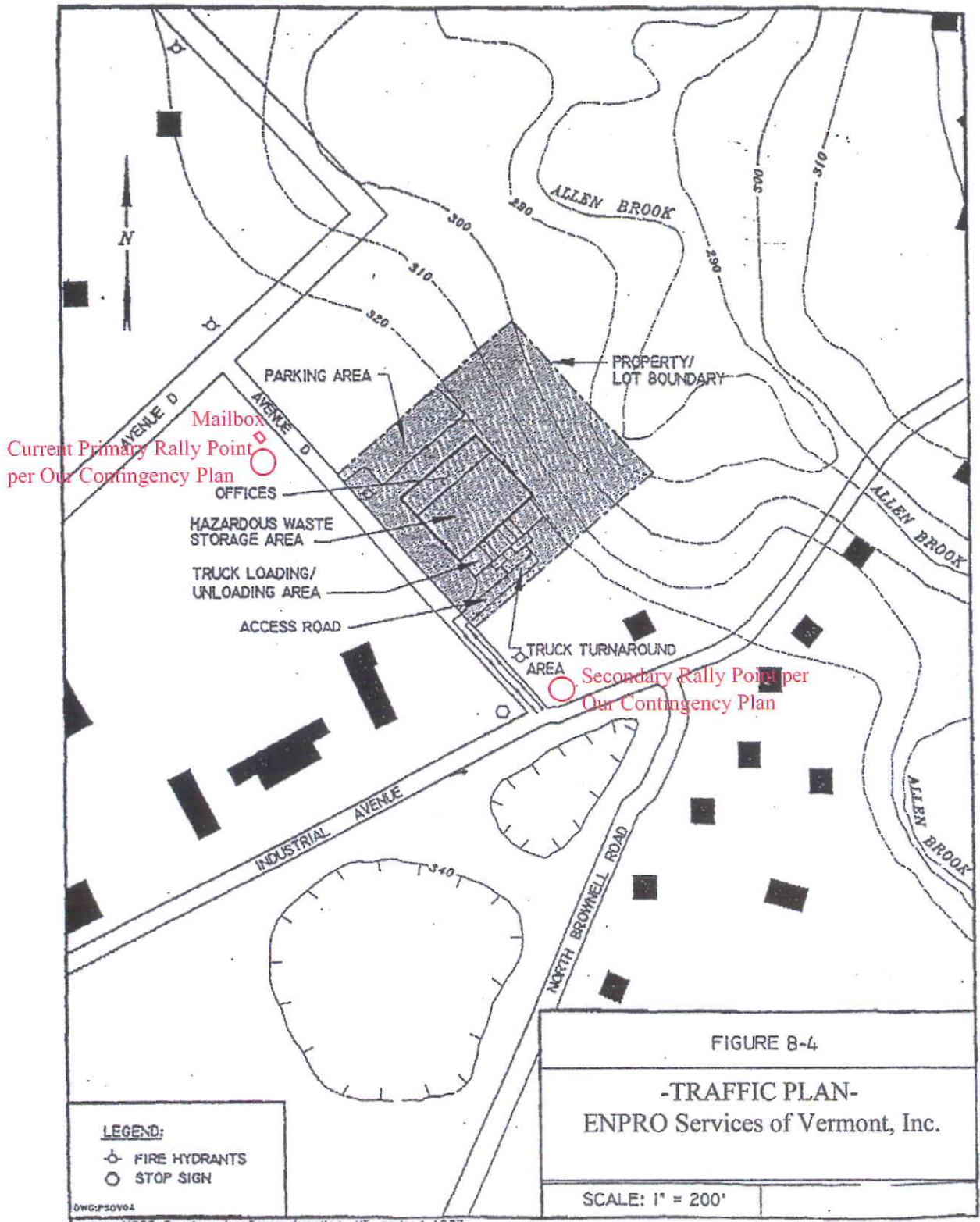
- LEGEND**
- EA - EVACUATION ALARM
 - EW - EYE WASH STATION
 - FA - FIRE ALARM
 - FE - FIRE EXTINGUISHER
 - FK - FIRST AID KIT
 - PH - TELEPHONE
 - SA - SECURITY ALARM
 - SH - SHOWER
 - SK - SPILL KIT
 - EL - EMERGENCY LIGHTING



APPENDIX E

SITE MAPS AND
EVACUATION ROUTES

APPENDIX E- SITE MAPS AND EVACUATION ROUTES



○ Evacuation Assembly Location

Appendix E

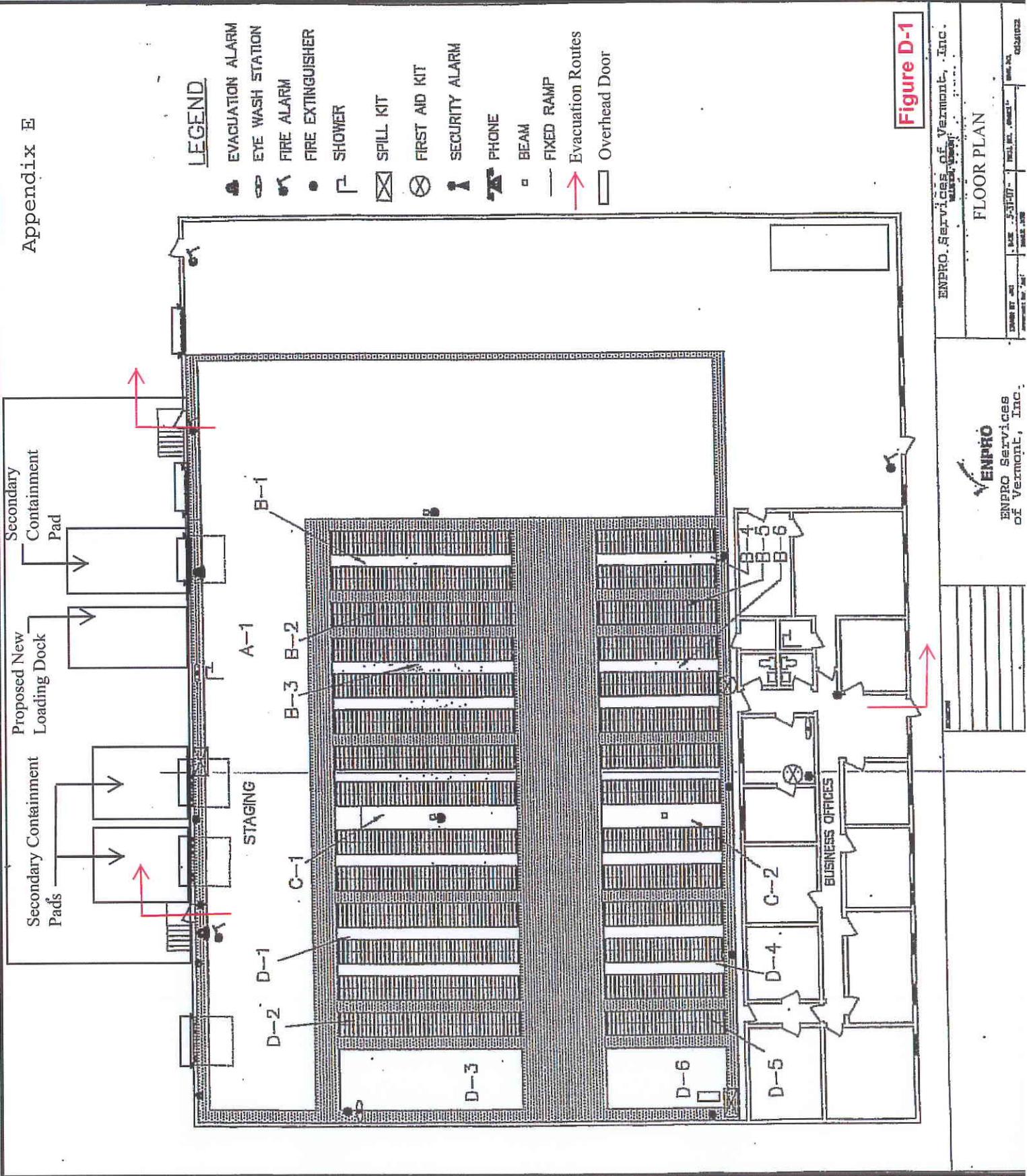


Figure D-1

ENPRO Services of Vermont, Inc.
 ENPRO Services of Vermont, Inc.
 FLOOR PLAN

ENPRO
 ENPRO Services of Vermont, Inc.

ENPRO Services of Vermont, Inc.
 ENPRO Services of Vermont, Inc.
 ENPRO Services of Vermont, Inc.

APPENDIX F

IMPLEMENTATION OF
CONTINGENCY PLAN FORM

APPENDIX F
Implementation of the Contingency Plan Form

(1) Name, address, and telephone number of operator and facility:

Operator and Facility Name	Operator's and Facility's Address	Operator's and Facility's Telephone number
ENPRO Services of Vermont, Inc.	54 Avenue D Williston, VT 05495	802-860-1200

(2) Name, address, and telephone number of facility contact person familiar with incident:

Name of Contact	Contact's Address	Contact's Telephone number

(3) Date, time, and type of incident:

Date and Time of Incident	Type of Incident

(4) Name and quantity of material(s) involved:

Name of Material Involved in the Incident	Quantity of Material

(5) The extent of injuries, if any;

--

- (6) An assessment of actual or potential hazards to human health or the environment, where this is applicable:

- (7) Estimated quantity and disposition of recovered material that resulted from the incident.

APPENDIX G
CONTINGENCY PLAN DISTRIBUTION LIST

APPENDIX G

CONTINGENCY PLAN DISTRIBUTION LIST

Jeff Baker ENPRO Services of Vermont, Inc. 54 Avenue D Williston, VT 05495
Jeff Frederick ENPRO Services of Vermont, Inc. 54 Avenue D Williston, VT 05495
Williston Fire Department Chief, Ken Morton 7900 Williston Road Williston, VT 05495
Williston Police Department Chief, Bart Chamberlain 7878 Williston Road Williston, VT 05495
Vermont State Police 2777 St. George Road Williston, VT 05495
Vermont Department of Public Safety Attn: Director of Emergency Management 103 South Main Street Waterbury, VT 05671
Mr. Steve Simoes Waste Management Division Vermont Department of Environmental Conservation 103 South Main Street - West Office Bldg. Waterbury, VT 05671
Local Emergency Planning Committee (LEPC #1) c/o Chittenden County Regional Planning Commission (CCRPC) 30 Kimball Avenue, Suite 206 South Burlington, VT 05403
Fletcher Allen Health Care Attn: Risk Management 111 Colchester Avenue Burlington, VT 05401

Mr. David Cowie
12 Mulliken Way
Newburyport, MA 01950

ENPRO Services, Inc.
Emergency Response Contractor
2 Flynn Ave
Burlington, VT 05401

Director
Waste Management Division
103 South Main Street, West Building
Waterbury, Vermont 05671-0404

APPENDIX H
TYPICAL WASTE INVENTORY

APPENDIX H

TYPICAL WASTE INVENTORY

DESCRIPTION	LOCATION/ BAY NOS.	NO. OF UNITS	TYPICAL UNIT DESCRIPTION
FLAMMABLE LIQUIDS/SOLVENTS	B1, B2, B3, B4	647	55 GALLON
FLAMMABLE SOLIDS	B5, B6	235	55 GALLON
ALKALINES	C1	353	55 GALLON
ACIDS	C2	235	55 GALLON
CLASS 9	D1	265	55 GALLON
LABPACKS- ALL TYPES OF WASTES "REACTIVES" CABINET	D3, D6	518	55 GALLON
PCB'S	D5	100	55 GALLON
OILY WASTE WATERS	A1	2 x 1,000	STORAGE TANKS
MIXTURE OF ALL ITEMS DESCRIBED ABOVE AND DEA WASTES (CONTROLLED SUBSTANCES)	A1	716	55 GALLON

SECTION H
PERSONNEL TRAINING PLAN

1.0 INTRODUCTION

The purpose of this Personnel Training Program is to describe training provided to all ENPRO Services of Vermont, Inc. (EVI) employees with waste management duties. Additional training may be provided to meet other regulatory requirements or internal needs.

2.0 JOB TITLES, JOB DESCRIPTIONS and REQUIRED TRAINING

The job descriptions and training requirements for the various EVI positions with associated waste management duties are described below.

2.1 Supervisor

2.1.1 *Job Description (as related to waste management)*

1. Conducts duties in a safe and compliant manner
2. Supervises senior waste technicians and waste technicians
3. Assigns work as necessary to maintain a functional and compliant facility
4. Interacts with environmental agencies and prepare/maintain documents required for compliance and/or maintained as part of the facility record
5. Oversees and approves waste information profile (“WIP”) approvals
6. Provides guidance to senior waste technicians and waste technicians on the proper management of waste materials
7. May arrange and schedule off-site waste shipments
8. May prepare wastes for off-site shipment
9. May conduct inspections in accordance with Section F of this permit
10. May conduct or schedule waste management training of EVI employees
11. Oversees implementation of the Waste Analysis Plan (Section C of this permit)
12. Oversees and may perform waste sampling, movement of waste into cells

2.1.2 *Requisite Skill, Education, or Other Qualifications*

1. High school diploma or equivalent
2. College education preferred
3. Previous experience in hazardous waste field preferred
4. Management experience preferred

2.1.3 *Initial Training*

1. Overview of RCRA, TSCA, Vermont Hazardous Waste Management Regulations and EVI’s Hazardous Waste Facility Certification
2. Overview of Hazardous Waste, Universal Waste and Used Oil Regulations
3. Waste Analysis Plan
4. Contingency Plan
5. Outgoing Manifest Procedures
6. Incoming Manifest Review

7. Container Management and Storage Area Standards
8. Satellite Accumulation Standards
9. Preparedness and Prevention
10. Land Disposal Restrictions
11. Non-Hazardous Solid Waste

2.1.4 *Annual Training*

1. Overview of EVI's Hazardous Waste Facility Certification
2. Waste Analysis Plan
3. Contingency Plan
4. Outgoing Manifest Procedures
5. Incoming Manifest Review
6. Container Management and Storage Area Standards
7. Satellite Accumulation Standards
8. Preparedness and Prevention
9. Land Disposal Restrictions
10. Non-Hazardous Solid Waste

2.2 Senior Waste Technician

2.2.1 *Job Description (as related to waste management)*

1. Conducts duties in a safe and compliant manner
2. Supervises waste technicians
3. Reports to the supervisor
4. May participate in WIP approval
5. Provides instruction to waste technicians on the proper management of waste materials
6. May receive waste from off-site
7. May prepare waste for off-site shipment
8. May sample, analyze (Level I), handle, or transfer waste
9. May maintain equipment used for the sampling, analysis, handling, and transfer of waste
10. May conduct inspections pursuant to Section F of this permit

2.2.2 *Requisite Skill, Education, or other Qualifications*

1. High school diploma or equivalent
2. College education preferred
3. Previous experience in hazardous waste field preferred.
4. Management experience preferred.

2.2.3 *Initial Training*

1. Overview of RCRA, TSCA, Vermont Hazardous Waste Management Regulations and EVI's Hazardous Waste Facility Certification
2. Overview of Hazardous Waste, Universal Waste and Used Oil Standards
3. Waste Analysis Plan
4. Contingency Plan

5. Outgoing Manifest Procedures
6. Incoming Manifest Review
7. Container Management and Storage Area Standards
8. Satellite Accumulation Standards
9. Preparedness and Prevention
10. Land Disposal Restrictions
11. Non-Hazardous Solid Waste

2.2.4 *Annual Training*

1. Overview of EVI's Hazardous Waste Facility Certification
2. Waste Analysis Plan
3. Contingency Plan
4. Outgoing Manifest Procedures
5. Incoming Manifest Review
6. Container Management and Storage Area Standards
7. Satellite Accumulation Standards
8. Preparedness and Prevention
9. Land Disposal Restrictions
10. Non-Hazardous Solid Waste

2.3 Waste Technician

2.3.1 *Job Description (as related to waste management)*

1. Conducts duties in a safe and compliant manner
2. Reports to senior waste technician or supervisor
3. Performs duties as assigned by supervisor or senior waste technician
4. May be responsible for maintaining various required facility records
5. May sample, analyze (Level I), handle, or transfer hazardous waste
6. May prepare hazardous wastes for off-site shipment
7. May maintain equipment used for the sampling, analysis, handling, treatment, or transfer of waste
8. May conduct inspections in accordance with Section F of this permit
9. May review WIPs with Senior Waste Technician or Supervisor

2.3.2 *Requisite Skill, Education, or other Qualifications*

1. High school diploma or equivalent.

2.3.3 *Initial Training*

1. Overview of RCRA, TSCA, Vermont Hazardous Waste Management Regulations and EVI's Hazardous Waste Facility Certification
2. Overview of Hazardous Waste, Universal Waste and Used Oil Standards
3. Waste Analysis Plan
4. Contingency Plan
5. Outgoing Manifest Procedures
6. Incoming Manifest Review
7. Container Management and Storage Area Standards
8. Satellite Accumulation Standards

9. Preparedness and Prevention
10. Land Disposal Restrictions
11. Non-Hazardous Solid Waste

2.3.4 *Annual Training*

1. Contingency Plan
2. Container Management and Storage Area Standards
3. Outgoing Manifest Completion
4. Incoming Manifest Review
5. Non-Hazardous Solid Waste

3.0 TRAINING CONTENT, FREQUENCY, AND TECHNIQUES

3.1 Training Content

Outlines for each of the initial and annual training topics (modules) are included in Appendix A of this section.

3.2 Training Frequency

Initial training will be provided to each employee with waste management duties within six months of the employee's start date or transfer to a different job description. These employees will be supervised until such time that initial training has been completed.

Annual training on each topic will be completed within approximate 12-month intervals (plus or minus three months). Annual training on each topic will be conducted at least once per calendar year.

3.3 Training Techniques

EVI occupies a unique niche in the waste management industry and believes that its training needs may not be adequately addressed by standardized training offered by "outside" contracted instructors. Consequently, EVI typically provides "in-house" training for facility-specific topics and only utilizes outside instructors for comprehensive and "refresher" trainings (e.g., RCRA/TSCA overview, OSHA 40-hour HAZWOPER, 8-hour refresher). In-house training is better suited to the various levels of experience possessed by EVI employees, Vermont-specific regulatory requirements, and the specific waste management situations that may be encountered by EVI employees.

Training may be provided "face-to-face" by a qualified instructor (e.g., EVI Supervisor, Senior Waste Technician or an outside consultant that is familiar with EVI's operations and hazardous waste facility certification) in a classroom setting, or using prepared media (e.g., video or workbooks). Proficiency examinations or quizzes may be used to evaluate training effectiveness.

4.0 TRAINING FOR EMERGENCY RESPONSE

All EVI employees whose job titles and descriptions are provided in paragraph 2.0 of this section receive training on EVI's Contingency Plan (Section G of this permit), Preparedness and Prevention procedures (Section F of this permit), and the OSHA 1910.120 40-hour HAZWOPER and 8-hour refresher trainings. In the event of an emergency, these employees are thereby trained to ensure that they are able to respond effectively until such time that local emergency responders arrive at the facility. At a minimum, emergency response training will familiarize EVI personnel with emergency procedures, emergency equipment, and emergency systems (including procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment, key parameters for automatic waste feed cut-off systems, communication and alarm systems, response to fires or explosions, response to groundwater contamination incidents, and shutdown of operations, as applicable).

5.0 DOCUMENTATION OF EMPLOYEE TRAINING

All employee training will be documented (per 40 CFR 264.16(d) and (e)). **Appendix B** of this section contains a typical document for the purpose of providing recordkeeping of completed training modules

APPENDIX A
TRAINING MODULES

WASTE ANALYSIS PLAN TRAINING MODULE

1. General overview
2. Waste Prequalification Procedures
 - Waste Information Profile (“WIP”) forms
 - Identification of Outbound Disposal Options
 - Lab Packs
3. Waste Receiving Procedures:
 - Level I Testing
 - Level II Testing
 - Level III Testing
4. Waste Acceptance Procedures
5. Outbound Waste Consolidation Procedures
6. Manifest Discrepancies
7. Proper Handling of Unknowns
8. Waste Sampling Procedures
9. Testing Methods
10. Proper Completion of forms/documents

OVERVIEW OF RCRA, TSCA, APPLICABLE VERMONT DEC REGULATIONS AND EVI HAZARDOUS WASTE FACILITY CERTIFICATION

TRAINING MODULE 1.

EPA RCRA regulations: 40 CFR 260-268

EPA TSCA regulations: 40 CFR 761

Vermont Hazardous Waste Management Regulations (Subchapters 1-9)

Overview of EVI's Hazardous Waste Facility Certification:

- SECTION A – PART A APPLICATION
- SECTION B – FACILITY DESCRIPTION
- SECTION C – WASTE ANALYSIS PLAN
- SECTION D – PROCESS INFORMATION
- SECTION E – GROUNDWATER MONITORING
- SECTION F – PROCEDURES TO PREVENT HAZARDS
- SECTION G – CONTINGENCY PLAN
- SECTION H – PERSONNEL TRAINING PLAN
- SECTION I – CLOSURE PLAN
- SECTION J – CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS
- SECTION K – OTHER FEDERAL LAWS
- SECTION L – PART B CERTIFICATIONS
- SECTION M – RESEARCH, DEVELOPMENT, AND DEMONSTRATION PERMITS
- SECTION N – 40 CFR 264, SUBPART AA AND BB
- SECTION O – 40 CFR 264, SUBPART CC
- SECTION P – DISCLOSURE STATEMENT

HAZARDOUS WASTE, UNIVERSAL WASTE AND USED OIL TRAINING MODULE

1. Hazardous Waste Exemptions
 - a. Subchapter 2; 7-203- Conditional Exemptions
 - b. Subchapter 2; 7-204- Recycling Exemptions

2. Lists of Hazardous Waste
 - a. Non-specific sources (F-list)
 - b. Specific sources (K-list)
 - c. Commercial Chemical Products (U- and P-lists)
 - d. Mixture and Derived-from Rules

3. Characteristics of Hazardous Waste
 - a. Ignitability
 - b. Corrosivity
 - c. Reactivity
 - d. Toxicity

4. Vermont Listed Hazardous Wastes (7-211)
 - a. VT01 - PCB's (equal to or greater than 50 ppm)
 - b. VT02 – Wastes containing greater than 5% Petroleum Distillates
 - c. VT03 - Water Miscible Metal Cutting and Grinding Fluid
 - d. VT06 - Pesticidal Wastes and Obsolete Pesticidal Products
 - e. VT08 - Waste Ethylene Glycol Solutions (greater than 700 ppm)
 - f. VT20 - Corrosive Solids
 - g. VT99 - Nonhazardous Wastes Shipped on a Hazardous Waste Manifest

5. Vermont Universal Wastes (Subchapter 9)
 - a. Batteries
 - b. Pesticides
 - c. Mercury Thermostats
 - d. PCB Lamp Ballasts
 - e. Lamps
 - f. Mercury-Containing Devices
 - g. Cathode Ray Tubes

6. Used Oil Management Standards (Subchapter 8)

CONTINGENCY PLAN TRAINING MODULE

1. Actions of facility personnel in response to hazardous waste emergencies
 - a. Spills/leaks/releases
 - b. Fires
 - c. Explosions
 - d. Response to groundwater contamination incidents
 - e. Key parameters for automatic waste feed cut-off systems
 - f. Shutdown of operations

2. Arrangements made with local authorities
 - a. Fire/police departments
 - b. State and local response teams
 - c. Contractors
 - d. Hospitals/ambulance services

3. Emergency coordinators
 - a. List of names, home addresses, office and home telephone numbers
 - b. Must be competent and have authority to commit resources
 - c. At least one emergency coordinator must be on-site or on-call

4. Emergency equipment list
 - a. Location
 - b. Physical description
 - c. Outline of capabilities
 - d. Procedures for inspecting, repairing, and replacing emergency equipment

5. Evacuation Plan
 - a. Signals
 - b. Routes
 - c. Alternate routes

**OUTGOING MANIFEST COMPLETION
TRAINING MODULE**

1. General Uniform Manifest Regulations
2. Steps to Manifest Completion

INCOMING MANIFEST REVIEW TRAINING MODULE

1. General Information
 2. Procedure for review of incoming manifests
 3. Procedures to make any changes:
 - a) Manifest discrepancies:
 - Significant discrepancy definition
 - Rejections
 - Container residues
 - Discrepancy resolution/reporting
 - b) Minor changes (i.e. change does not meet a “discrepancy” as defined by 7-704 (g))
-

CONTAINER MANAGEMENT AND STORAGE STANDARDS TRAINING MODULE

1. Containers must be in good condition.
2. Containers must be compatible with the waste.
3. Containers containing hazardous waste must be labeled or marked clearly with the words "Hazardous Waste." Containers containing Vermont-regulated waste must be labeled or marked clearly with the applicable Vermont code.
4. Containers must be marked with the accumulation start date / LDR start date.
5. Containers must be closed except when adding or removing waste.
6. Containers must be managed to avoid damage and releases.
7. Incompatible wastes are not to be placed in the same container.
8. Ignitable/reactive wastes must be 50 feet from the property line.
9. "No Smoking" signs must be posted in areas where there are ignitable/reactive wastes.
10. Incompatible wastes are to be separated or protected from each other by means of a dike, berm, wall, or separated by sufficient distance.
11. Adequate aisle space is to be maintained between rows of containers.
12. Inspect container accumulation and storage areas and emergency equipment as required by permit.
13. Containers may be stacked two-high, but must be palletized and banded.

SATELLITE ACCUMULATION OF HAZARDOUS WASTE TRAINING MODULE

1. Satellite Accumulation Points
 - a. Areas "at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste."
 - b. Satellite accumulation points are not subject to the 90-day accumulation standards that apply to central accumulation/storage areas.

2. Requirements
 - a. Wastes must be placed in containers that are in good condition.
 - b. Wastes must be compatible with the containers.

 - c. Containers must always be closed, unless wastes are being added or removed.
 - d. Containers must be marked with the words "Hazardous Waste" or other words that identify the contents of the containers.
 - e. Accumulation limit of 55-gallons of hazardous waste (1 qt. of acutely hazardous waste) per satellite area.
 - f. Containers must be marked with the accumulation start date when "excess accumulation" begins (when the container is filled to capacity).
 - g. Full containers must be moved to 90-day accumulation area within 3 days after being filled to capacity.

**PREPAREDNESS AND PREVENTION
TRAINING MODULE**

1. Maintenance and operation of the facility so as to minimize the possibility of fire, explosion, or unplanned release.
 2. Provision of certain requirement equipment:
 - a. Internal communications or alarm system;
 - b. Telephone or two-way radio;
 - c. Portable fire extinguishers, fire control equipment, spill control and decontamination equipment; and
 - d. Water at adequate volume and pressure.
 3. Testing and maintenance of equipment
-
4. Access to communications or alarm system
 5. Aisle space required to allow emergency response.

LAND DISPOSAL RESTRICTIONS TRAINING MODULE

1. Determine, for each hazardous waste generated, whether it is currently subject to the land disposal restrictions.
2. Determine, at the point of generation, all applicable waste codes (listings and characteristics), the category (wastewater or non-wastewater), appropriate subcategories (if any) for each restricted waste and underlying hazardous constituents, as applicable.
3. Determine all applicable treatment standard(s) and any prohibition level(s) for each restricted waste. Treatment standards typically distinguish between wastewaters and non-wastewaters.
4. Determine, through specified analytical techniques or knowledge of the waste, whether the treatment standard has been achieved. Analysis is either on a total constituent basis or on a TCLP extract.
5. Comply with storage time limitations (1 year presumptive maximum - permitted storage facilities or 90 days - generator/accumulators).

6. Comply with prohibitions on evaporation and/or dilution of restricted wastes as a substitute for adequate treatment. Comply with prohibitions on switching wastes from wastewater to non-wastewater forms.
7. Prepare notifications, demonstrations, and certifications required for offsite waste management:
 - a. When sending wastes off-site for treatment, notify treatment facility of waste codes and category, and specify subcategory and underlying hazardous constituents as applicable.
 - b. When sending offsite any wastes that meet BDAT concentration levels or have been treated by the specified technology, provide a notice and certification that the waste meets the applicable treatment standards.
 - c. When sending offsite any wastes subject to extensions or variances, provide a notice stating that the waste is not currently subject to the land disposal restrictions.
 - d. For restricted waste excluded/exempted from regulation subsequent to the point of generation, place a notice in the files identifying such wastes, along with their ultimate disposition.
8. Maintain copies of all notices, certifications, demonstrations, waste analysis data, and other documentation (for knowledge of waste-based determinations) for at least five (5) years from the date the waste was last sent to onsite or offsite treatment, storage, or disposal. Document where restricted waste was treated, stored, or disposed of (applies to both off-site and on-site management).

**NON-HAZARDOUS SOLID WASTE
TRAINING MODULE**

1. Types and Definitions of Non-Hazardous Solid Wastes Managed at EVI
2. Special Requirements for Conditionally Exempt Wastes
3. Special Requirements for Household Hazardous Wastes

APPENDIX B- Training Document

TRAINING DOCUMENT

Name: _____ Date: _____

(Print)

TRAINING SESSION/SEMIAR TITLE: _____

DESCRIPTION OF PROGRAM: _____

IN-HOUSE TRAINING PROGRAM [] OUTSIDE AGENCY PROGRAM []

SPONSORING AGENCY: _____

LENGTH OF SESSION: _____ (IN HOURS)

PRINCIPAL INSTRUCTOR(S): _____

YOUR PARTICIPATION: INSTRUCTOR [] PARTICIPANT []

I certify that I have trained in the above subject matter and have had the opportunity to ask questions, and that those questions have been answered to my satisfaction.

EMPLOYEE SIGNITURE: _____

INSTRUCTOR SIGNITURE: _____

SECTION I
CLOSURE PLAN

1.0 INTRODUCTION

ENPRO Services of Vermont, Inc. ("EVI") operates a commercial hazardous waste storage facility at 54 Avenue D in the Whitcomb Industrial Park in Williston, Vermont. EVI has prepared this closure plan, including a cost estimate for all closure activities, in accordance with EVI's Hazardous Waste Storage Facility Permit, Vermont Hazardous Waste Management Regulations (VHWMR) Sections 7-309(c) and 7-504(e), 40 CFR Part 264 Subpart G (facility closure) and Section 264.197 (tank closure), and 40 CFR Part 761.

This closure plan will be implemented in the event that final closure of the entire facility becomes necessary. In the event that closure of individual hazardous waste management units or areas of the facility becomes necessary, EVI will implement those provisions of this closure plan that are applicable to the unit(s) being closed. Such partial closures may be necessary due to decommissioning of tanks or equipment, changes in regulatory requirements, modifications of operations, or replacement of permitted units or portions of permitted units during the operating life of the facility. Partial closure of a portion of a hazardous waste management unit would proceed in the same manner described herein for final closure of the entire unit, with respect to removal of inventory and residues, as well as decontamination of equipment and structures and verification sampling and analysis. The closure activities discussed herein are intended to achieve clean closure of the facility or the unit(s) being closed.

2.0 FACILITY DESCRIPTION

The EVI facility is a commercial industrial hazardous and solid waste storage facility (North American Industrial Classification System Code 562211) located one mile east of the Burlington Airport, 2 miles north of Route 89 Exit 12, and 4 miles west of the town center of Williston, in Chittenden County, Vermont. The facility is located in the Whitcomb Industrial Park. A site location map is included as Appendix A of this section and was obtained from the US Geological Survey 7.5 Minute Quadrangle Map (Essex Junction and Burlington) dated 1948 and photo revised in 1987.

EVI is permitted to store up to 129,415 gallons of hazardous waste; materials containing polychlorinated biphenyls (PCBs) and solid wastes received from a wide variety of off-site sources. In general, hazardous and solid wastes managed at the EVI facility include: solids, liquids, gases and sludges; contaminated soils and debris; organic wastestreams such as inks, paints, solvents and other hydrocarbons; contaminated waters and leachate; lab packs; and treatment residues.

In addition, EVI is authorized by EPA (see Appendix K of this section) to store PCBs generated from a wide variety of off-site sources. EVI anticipates storing small PCB articles, PCB containers, PCB waste, and remediation waste, and PCB containing oil. EVI may store PCB materials with greater than 50 parts per million PCB content. EVI is permitted to store 5,500 gallons of materials containing PCB's at concentrations subject to regulation at 40 CFR Part 761.

2.1 Container Storage Areas (Cells)

EVI stores hazardous waste, PCB materials, and non-hazardous solid waste (e.g., latex paints, household hazardous waste) in a variety of U.S. Department of Transportation approved container types. Containerized wastes are stored in eleven different "storage cells," as determined by waste type. All of the container storage cells are located inside the facility building. Hazardous and solid wastes are stored in the storage cells designated as B-1 through B-6, C-1, C-2, and D-1 through D-6. PCB materials subject to regulation at 40 CFR Part 761 are only stored in storage cells D-2 and D-5; EVI may also store hazardous and solid wastes in these cells, but will not store PCB wastes in any other cells. A facility diagram illustrating the container storage cell layout, office areas and other areas where wastes are not managed is included as **Appendix B** of this section.

Storage cell A-1 is used primarily to stage wastes that are received from off-site (i.e., to verify waste information and conduct Level 1 waste analysis), and to prepare wastes for shipment off-site. EVI also maintains two 1,000 gallon poly tanks in storage cell A-1.

2.2 Tanks

EVI utilizes two 1,000 gallon poly tanks that are compatible and suitable for the wastes stored in them (i.e., only wastes identified by the VT02, VT03, VT08, and compatible non-hazardous waste waters identified by the VT99 waste codes are stored in the two tanks). Both tanks are located in Cell A-1 (see **Appendix B** of this section).

2.3 Outdoor Loading Dock and Containment Structures, and Waste Handling Equipment

EVI utilizes an outdoor concrete loading dock and two outdoor secondary containment structures for the purposes of loading and unloading transportation vehicles (see **Appendix B** of this section). In addition, EVI utilizes waste handling equipment to facilitate the movement of wastes within the facility. This equipment includes metal rollers in each storage cell and portable ramps to move containerized waste from Cell A-1 to other cells.

2.4 Wastes Accumulated at the Facility

The hazardous wastes managed at the EVI facility (and, if applicable, the US EPA and Vermont hazardous waste codes associated with those wastes) are identified in **Section A** of this permit. EVI also accumulates PCB waste at the facility in compliance with the facility's EPA/TSCA authorization (see **Appendix K** of this section).

3.0 CLOSURE PLAN AND CLOSURE PERFORMANCE STANDARD

The purpose of this plan is to identify the steps necessary to perform partial and/or final closure of the EVI facility. Until closure is completed and certified, a copy of the original approved closure plan, and all approved revisions of that plan, will be maintained as part of the EVI facility operating record.

3.1 Summary of Closure

EVI plans to “clean close” the entire permitted facility during final closure, and does not anticipate “partial closure” of individual hazardous waste management units (i.e., container storage cells). Facility closure will be performed following the procedure identified in Section 6 of this plan.

3.2 Closure Plan Modification

EVI will modify this closure plan whenever:

- There are any changes in operating plans or facility design that materially effect the closure plan;
- There is a change in the expected time frame of closure; or,
- In conducting closure activities, unexpected events require a modification of the closure plan.

In order to modify this closure plan, EVI will submit a written request to the Vermont Department of Environmental Conservation, Waste Management Division Director. Any written request for modification of the closure plan will include a copy of the amended plan with all changes clearly identified (e.g., underline / strikeout). The request will be submitted for approval at least 60 days prior to the proposed change in facility design or operation, or no later than 60 days after an unexpected event has occurred which has affected the closure plan. If an unexpected event occurs during the closure period, the request for modification will be made no later than 30 days after the unexpected event. In addition, a verbal notification will be made to the Waste Management Division Director within 24 hours after an unexpected event has occurred which affects the plan. The verbal notification will be followed by the written request.

3.3 Closure Performance Standard

EVI will close the facility, individual hazardous waste management units, and/or equipment in a manner that:

- Minimizes the need for further maintenance;
- Controls, minimizes, or eliminates to the extent necessary to be protective of human health and the environment, the escape of hazardous waste, hazardous

constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground, surface water or atmosphere;

- Complies with the closure requirements specified in 40 CFR Part 761, 40 CFR Part 264 Subpart G for container storage cells and other waste management areas/structures, and 40 CFR Section 264.197 for the two 1,000 poly gallon tanks.

The following sections describe the procedures to meet the closure performance standard for the EVI facility.

4.0 NOTIFICATION OF PARTIAL OR FINAL CLOSURE

In accordance with 40 CFR 264.112(d) and VHWMR 7-504(e), EVI will notify the Waste Management Division Director in writing at least 45 days prior to the date on which partial or final closure activities are expected to begin. The 45-day notice period is appropriate because no surface impoundment, waste pile, land treatment, or landfill units requiring an earlier notification are present at the EVI facility. EVI has not predicted any date upon which the facility would cease operation and undergo final closure. As final closure is not expected prior to expiration of the permit, the expected year of final closure is not required, per 40 CFR 264.112(b)(7) and VHWMR 7-504(e). EVI has, for the financial assurance mechanism, identified a closure date of 2040 (thirty years from the present). EVI may initiate partial closure of specific hazardous waste management units or portions of units as described herein.

In accordance with 40 CFR 761.65(e)(6), EVI, as a commercial storer of PCB waste, will notify the Regional Administrator of the U.S. EPA in writing at least 60 days prior to the date on which final closure of the PCB storage areas of the facility are expected to begin.

5.0 ESTIMATE OF MAXIMUM INVENTORY AT CLOSURE

The maximum potential inventory of waste, including all hazardous waste, at the EVI facility at the time of closure is 129,415 gallons, or the equivalent of 2,353 55-gallon containers (see **Appendix F** of this section). This maximum potential inventory is the sum of the maximum allowed capacities of the container storage cells (waste stored in the two 1,000 gallon poly tanks is included in the maximum capacity of Cell A-1 where the tanks are located). Included within the maximum potential waste inventory is the maximum allowed PCB material inventory of 100 55-gallon containers (5,500 gallons).

As stated in section 10, below, waste inventory disposal costs assume a worst case/"most-expensive" situation. The disposal cost for the maximum potential waste inventory of each container storage cell is calculated based on the most expensive-to-dispose-of hazardous waste that may be stored in each respective cell.

6.0 CLOSURE OF EQUIPMENT, CONTAINERS AND TANKS

An independent third-party will be hired by EVI to perform all closure activities.

6.1 Closure Procedure

The container storage cells, the two 1,000 gallon poly tanks, the outdoor loading dock and containment structures used for transportation-related waste handling activities, and moveable equipment (e.g. rollers, ramps, fork trucks, pumps, hoses, drum dollies hand tools) will be closed in accordance with the Vermont Hazardous Waste Generator and Facility Closure Guidance (dated May 2005) as follows:

Step 1

The entire inventory of waste (including all hazardous wastes) stored in hazardous waste management units (i.e. the container storage cells and tanks) will be removed and transported to a permitted facility in accordance with the applicable requirements of the Vermont Hazardous Waste Management Regulations, the U.S. Department of Transportation regulations, EPA TSCA regulations, and 40 CFR Part 268 (Land Disposal Restrictions). Records of all off-site shipments will be maintained as part of EVI's facility operating record.

Step 2

Rollers and ramps will be removed from each storage cell and placed in Cell A-1. Each storage cell and the outdoor containment structures will then be inspected and any residues observed in those storage cells or containment structures will be removed utilizing a broom and dust pan or shovel (solids) or a pump (liquids), placed into suitable U.S. DOT-approved containers, and properly characterized to determine if it exhibits a hazardous waste characteristic or is regulated as a Vermont-listed hazardous waste. After being characterized, all residues will be shipped to a properly permitted facility (see **Appendix D** of this section).

Step 3

A silicone caulk sealant will be applied, as necessary, to fill any cracks or gaps observed in the container storage cells to minimize the potential of a release of decontamination water ("rinsate") to the environment. Absorbent spill booms or other similar equipment may also be used to surround areas being cleaned to contain rinsate generated during the decontamination process.

Step 4

The container storage cells, the two 1,000 gallon poly tanks, the outdoor loading dock and containment structures, and movable equipment will be decontaminated using a pressure wash/rinse process.

All waste management units and equipment will be prepared for pressure washing by applying an appropriate cleaning agent in accordance with the manufacturer's instructions and recommendations (e.g., the cleaning agent may either be left undisturbed to begin dissolving surface contaminants or scrubbed into the surface). A high-pressure / low-volume washer will then be used to remove contaminants and cleaning agent residues from the units and equipment. The resulting rinsate from each waste management unit will be segregated in containers, and any rinsate resulting from the decontamination of a waste management unit found to contain hazardous waste debris or liquid during Step 2 of this procedure must be analyzed to determine if it exhibits a hazardous waste characteristic or is regulated as a Vermont-listed hazardous waste. Any rinsate that EVI determines to be hazardous waste will be shipped off-site in accordance with the VHWMR.

All non-hazardous rinsate will be transferred to a vacuum tank truck. A representative sample will be collected from each vacuum tank truck and analyzed to determine if it exhibits a hazardous waste characteristic or is regulated as a Vermont-listed hazardous waste. Upon receipt of the analytical results, the rinsate will be shipped off-site to a properly permitted facility.

EVI will work from the back of the facility towards the front to keep rinsate from re-contaminating areas that were previously decontaminated.

After the rollers and ramps have been pressure washed/rinsed in storage Cell A-1, that equipment will be placed on poly in the empty drum and dry storage area of the building. Cell A-1 will then be decontaminated as described in this step.

Non-disposable clean-up and sampling equipment will also be decontaminated as described in this step.

Step 5

An independent Vermont-licensed professional engineer will inspect each waste management unit, the loading dock and outdoor containment structures, the two 1,000 gallon poly tanks, and all movable equipment to determine if the surfaces of these areas/equipment are "clean surfaces." A "clean surface" is a surface that, when viewed without magnification, is free of all visible hazardous waste, except for residual staining caused by waste consisting of light shadows, slight streaks or minor discolorations. Any area that does not meet the "clean surface" criteria will be decontaminated again by repeating Step 4.

Step 6

EVI will either collect PCB swipe samples for all moveable equipment and non porous surfaces to determine if EPA TSCA "clean closure" criteria are met. Bulk concrete samples will be collected from the outdoor loading dock and containment structures, the waste staging area (storage Cell A-1), and Cells D-2 and D-5 in accordance with **Appendix E and J** of this section, and analyzed for PCBs. If the testing results for the PCB swipe or concrete samples exceed limits

specified in **Appendix C** of this section, Step 4 will be repeated as necessary. Detailed PCB sampling and analyses procedures are included as **Appendix L** of this section.

Alternatively, unit / structure components (e.g., concrete) may be removed and disposed of at an off-site facility permitted to receive them. Any material that is removed and sent off-site for disposal will meet the requirements for disposal of contaminated debris in accordance with applicable provisions of 40 CFR Part 268, prior to actual disposal. PCB materials would be considered PCB remediation waste in accordance with applicable revisions of 40 CFR 761.

This procedure complies with 40 CFR 761.79(c).

Step 7

Personal protective equipment, contaminated debris (e.g., boom) miscellaneous disposable clean-up supplies (e.g. brooms) and disposable sampling equipment will be containerized to determine if it exhibits a hazardous waste characteristic or is regulated as a Vermont-listed hazardous waste. Upon receipt of the analytical results, this waste will be shipped off-site to a properly permitted waste management facility.

Step 8

An independent professional engineer licensed in Vermont and an authorized EVI representative will certify that closure is completed in accordance with the specifications of the this plan (See **Appendix H** of this plan). The professional engineer will certify closure in accordance with Section 7-309(c) of the VHWMR.

After decontamination and certification of closure are complete, the facility or affected permitted units and associated equipment will be considered “closed” and no longer regulated as waste management units.

6.2 Clean-Closure Criteria

Appendix C of this section provides the criteria for establishing clean closure for the facility under the VHWMR and TSCA. EVI will utilize “Option 1” of the Vermont Hazardous Waste Generator and Facility Closure Guidance (May 2005, Page 7), as the criteria for “clean closure.” In addition, for Cells D-2 and D-5 (i.e. PCB storage areas) In addition, in order to consider Cells D-2 and D-5 clean closed and available for unrestricted use pursuant to EPA TSCA requirements, swipe sample (non-porous) results must be less than 10 $\mu\text{g}/100 \text{ cm}^2$ PCBs and concrete floor sample (porous) results must be less than 1 milligram/kilogram. PCBs.

6.3 Management of Closure Wastes

All wastes removed from the EVI facility during closure will be managed and shipped off-site in compliance with EVI’s Hazardous Waste Storage Facility

Permit; the VHWMR; EPA TSCA regulations, and U.S. DOT regulations. EVI will use only properly permitted transporters and facilities for the treatment, storage, or disposal of any wastes generated during closure.

Off-site shipments of hazardous and/or PCB wastes from EVI will be accompanied by a uniform hazardous waste manifest. If applicable, Land Disposal Restriction notices will accompany the shipments in accordance with 40 CFR Part 268. Wastes will be properly described, packaged, marked, and labeled per the applicable U.S. DOT regulations found at 49 CFR Parts 171-179.

7.0 CLOSURE SCHEDULE

Within 90 days after receiving the known final volume of hazardous waste in a specific hazardous waste management unit (partial closure) or at the entire facility (final closure), EVI will remove all wastes remaining in units undergoing closure in accordance with this plan.

In accordance with 40 CFR Part 761, EVI will notify the EPA Regional Administrator at least 60 days prior to the date on which final closure (PCB units) is expected to begin. In addition, EVI will initiate closure activities within 30 days after the date on which EVI received the final quantities of PCB waste.

An anticipated schedule for final closure of the EVI facility is provided in Appendix G .

8.0 EXTENSION FOR CLOSURE

Although not anticipated, EVI may propose modifications to the approved closure plan or otherwise petition the VT Waste Management Division Director to obtain approval for a longer closure period according to the requirements of 40 CFR 264.113 (a) [incorporated by reference through VHWMR 7-504(e)] and 40 CFR Part 761.65 which allow approval of a longer period for removal of the final volume of wastes, provided that EVI complies with all applicable requirements for requesting a permit modification, and demonstrates that:

- the activities required to comply with this time period will, of necessity, take longer than the allotted time to complete; or
- the waste management unit or facility has the capacity to receive additional wastes; and,
- there is a reasonable likelihood that EVI or another person will recommence operation of the waste management unit or the facility within one year; and,
- closure of the waste management unit or facility would be incompatible with continued operation of the site; and,
- EVI has taken and will continue to take all steps to prevent threats to human health and the environment, including compliance with all applicable permit requirements.

Within 180 days after receiving the known final volume of waste at a specific waste management unit (partial closure) or at the entire facility (final closure), EVI will complete closure activities in accordance with the approved closure plan. Although not anticipated, EVI may propose modification to the approved closure plan or otherwise petition the VT Waste Management Division Director to obtain an extension to the closure period. Closure regulations found at 40 CFR 264.113 (b) [incorporated by reference through VHWMR 7-504(e)] and 40 CFR 761.65 (e)(6) allow for approval of an extension to the closure period provided that EVI complies with all applicable requirements for requesting a permit modification, and demonstrates that:

- The partial or final closure activities required to comply with the closure plan will of necessity, take longer than one hundred eighty (180) days to complete; or
- The waste management unit or facility has the capacity to receive additional wastes; and,
- There is a reasonable likelihood that EVI or another person will recommence operation of the unit within 1 year; and,
- Closure of the waste management unit or facility would be incompatible with continued operation of the site; and,
- EVI has taken and will continue to take steps to prevent threats to human health and the environment, including compliance with applicable permit requirements.

The demonstration with respect to the extension of the 90-day period will be made at least 30 days prior to the expiration of the 90-day period allowed for removal of all wastes from the unit or facility. The demonstration with respect to extension of the 180-day period will be made at least 30 days prior to the expiration date for completion of closure activities.

9.0 CERTIFICATION OF CLOSURE

The following sections describe the certification process and documents that will be prepared following completion of the closure process.

9.1 Closure Certification

Within 60 days after completion of partial or final closure, EVI will submit to the VT Waste Management Division Director by registered mail, a certification that the waste management unit or facility, as applicable, has been closed in accordance with the approved closure plan and the provisions of Section 7-309(c) of the VHWMR. The certification will be signed by an appropriate authorized signatory of EVI and by an independent professional engineer licensed in the State of Vermont. Documentation supporting the independent professional engineer's certification will be furnished to the VT Waste Management Division Director upon request. Certification language will conform to the requirements of Section 7-108 of the VHWMR current at the time of closure. An example of closure certification language is provided in **Appendix H** of this section.

9.2 Closure Report

A closure report will be submitted to the VT Waste Management Division Director to document that facility closure was completed in accordance with the provisions of Section 7-309(c) of the VHWMR. The closure documentation report will include the following:

- A chronological summary of closure activities
- A description of the wastes removed during the closure period
- The volume of waste removed during the closure period
- The method(s) of waste handling and transport for all wastes shipped during the closure period
- Copies of uniform hazardous waste manifests and other shipping documents for all wastes shipped during the closure period
- A summary of the sampling and analysis methods utilized
- Photographs
- Copies of analytical results
- Closure certification statement (see Section 9.1)
- A request for release from the financial assurance requirement

10.0 CLOSURE COST ESTIMATE

The estimated costs for closure of the waste management units (i.e., container storage cells, tanks), the loading dock and outside containment structures, and movable equipment at the EVI facility are itemized in **Appendix F** of this section. The total estimated cost for the closure of the container storage and staging areas is \$ 581,658.00 in March 2010 dollars. The closure cost estimate was compiled utilizing estimates obtained from independent third-party transportation, treatment, and disposal firms. Portions of this closure cost estimate may be applicable in the event of partial closure of individual waste management units.

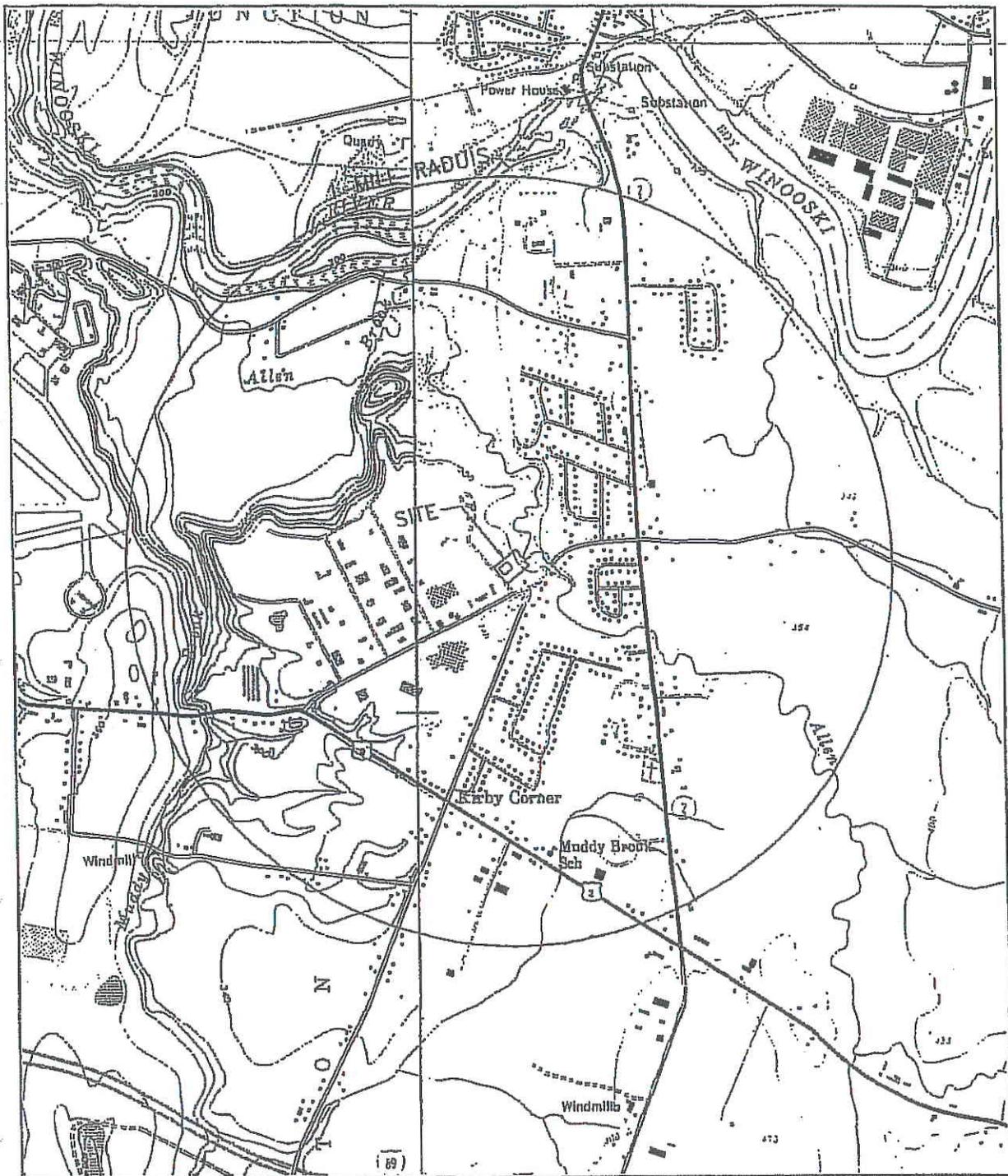
This closure cost estimate will be modified within 30 days after a revision has been made to the closure plan, which increases the cost of closure, as required. The total closure cost estimate will be updated annually in accordance with the guidelines provided at 40 CFR 264.142(b) [incorporated by reference through VHWMR 7-504(e)] and 40 CFR 761.65 (g).

11.0 FINANCIAL ASSURANCE AND INSURANCE

EVI has established an irrevocable standby letter of credit as the financial assurance mechanism for facility closure (see **Appendix I** of this section). This financial assurance will be updated to cover any changes to the closure cost estimate in the most recent approved closure plan and on an annual basis, in accordance with 40 CFR 264.142. Specifically, the letter of credit will be updated to include the final closure cost estimate for closure of the facility.

EVI maintains insurance for sudden, accidental, and gradual occurrences as required by 40 CFR Part 264.147. Evidence of insurance has been provided to the Vermont Waste Management Division Director (see **Appendix I** of this section).

APPENDIX A
SITE LOCATION MAP



FACILITY LOCATION
 LAT: N47°27'40"
 LON: W73°07'08"

SCALE: 1" = 2000'
 0 1000' 2000'

NOTES:

1. THERE ARE NO INJECTION WELLS AT THE FACILITY.
2. THERE ARE NO KNOWN DRINKING WATER WELLS WITHIN 0.25 MILES OF THE FACILITY.

REF: USGS 7.5 MINUTE SERIES
 VERMONT - ESSEX JUNCTION,
 BURLINGTON QUARRANGLES

NORTH



VERMONT



Figure 1

ENPRO Services of Vermont, Inc.
 Shelton, Vermont

SITE LOCATION MAP
 SHOWING 1 MILE RADIUS

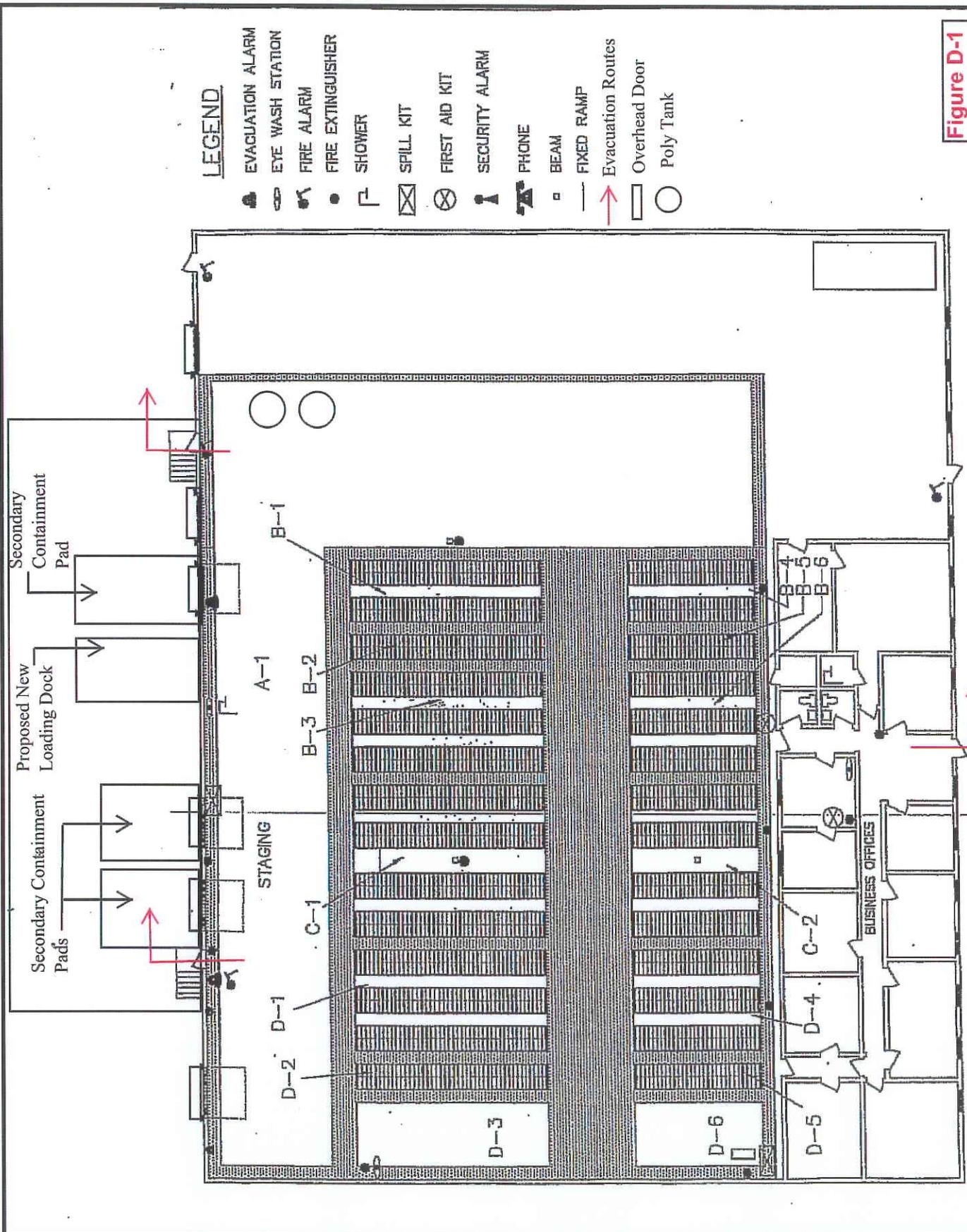
DRAWN BY: JNG
 APP. BY: ILB
 JOB NO. 02032

EVI

DATE: 5-31-07
 SCALE: 1" = 2000'
 DRW: TDF02

ENPRO Services of Vermont, Inc.

APPENDIX B
FLOOR PLAN



LEGEND

- EVAUATION ALARM
- EYE WASH STATION
- FIRE ALARM
- FIRE EXTINGUISHER
- SHOWER
- SPILL KIT
- FIRST AID KIT
- SECURITY ALARM
- PHONE
- BEAM
- FIXED RAMP
- Evacuation Routes
- Overhead Door
- Poly Tank

Figure D-1

ENPRO Services of Vermont, Inc.
 1000 Rte. 100, Vergennes, VT 05491
 PHONE: 802-249-1111 FAX: 802-249-1112
 WWW: WWW.ENPRO.COM

ENPRO
 ENPRO Services of Vermont, Inc.

FLOOR PLAN

APPENDIX C
CLEAN CLOSURE CRITERIA

CLEAN CLOSURE CRITERIA

Type of Sample	Analyte or Criteria	Type of Surface	Regulatory Program	Closure Criteria
Visual	A "clean surface" is a surface that when viewed without magnification, is free of all visible hazardous waste, except for residual staining caused by waste consisting of light shadows, slight streaks or minor discolorations.	Epoxy Coated Concrete	RCRA	An independent Vermont-licensed professional engineer will inspect each storage cell, the inside of each storage tank, the loading dock and outdoor containment structures to determine if these areas are "clean surfaces."
Visual	A "clean surface" is a surface that when viewed without magnification, is free of all visible hazardous waste, except for residual staining caused by waste consisting of light shadows, slight streaks or minor discolorations.	Steel Rollers, Ramps and Non-Disposable Equipment	RCRA	An independent Vermont-licensed professional engineer will inspect the rollers, ramps and non-disposable equipment, to determine if these areas are "clean surfaces."
Bulk	Polychlorinated Biphenyls	Epoxy Coated Concrete	TSCA	1 Milligram/Kilogram for reuse without restriction from a composite sample representing 100 square feet.
Swipe	Polychlorinated Biphenyls	Walls, Ceiling, and Support Structures	TSCA	10 µg/100 cm ² for reuse without restriction for assessment purposes
Swipe	Polychlorinated Biphenyls	Laboratory Surfaces	TSCA	10 µg/100 cm ² for reuse without restriction for assessment purposes
Swipe	Polychlorinated Biphenyls	Moveable Equipment	TSCA	10 µg/100cm ² or decontamination in accordance with 40 CFR Part 761.79(c) for reuse without restriction

APPENDIX D
ANALYTICAL PARAMETERS

Characteristic of ignitability (D001)

(a) A solid waste exhibits the characteristic of ignitability if a representative sample of the waste has any of the following properties:

(1) It is a liquid, other than an aqueous solution containing less than 24 percent alcohol by volume and has flash point less than 60 °C (140 °F), as determined by a Pensky-Martens Closed Cup Tester, using the test method specified in ASTM Standard D 93-79 or D 93-80 (incorporated by reference, see §260.11), or a Setaflash Closed Cup Tester, using the test method specified in ASTM Standard D 3278-78 (incorporated by reference, see §260.11).

(2) It is not a liquid and is capable, under standard temperature and pressure, of causing fire through friction, absorption of moisture or spontaneous chemical changes and, when ignited, burns so vigorously and persistently that it creates a hazard.

(3) It is an ignitable compressed gas.

(i) The term "compressed gas" shall designate any material or mixture having in the container an absolute pressure exceeding 40 p.s.i. at 70 °F or, regardless of the pressure at 70 °F, having an absolute pressure exceeding 104 p.s.i. at 130 °F; or any liquid flammable material having a vapor pressure exceeding 40 p.s.i. absolute at 100 °F as determined by ASTM Test D-323.

(ii) A compressed gas shall be characterized as ignitable if any one of the following occurs:

(A) Either a mixture of 13 percent or less (by volume) with air forms a flammable mixture or the flammable range with air is wider than 12 percent regardless of the lower limit. These limits shall be determined at atmospheric temperature and pressure. The method of sampling and test procedure shall be acceptable to the Bureau of Explosives and approved by the director, Pipeline and Hazardous Materials Technology, U.S. Department of Transportation (see Note 2).

(B) Using the Bureau of Explosives' Flame Projection Apparatus (see Note 1), the flame projects more than 18 inches beyond the ignition source with valve opened fully, or, the flame flashes back and burns at the valve with any degree of valve opening.

(C) Using the Bureau of Explosives' Open Drum Apparatus (see Note 1), there is any significant propagation of flame away from the ignition source.

(D) Using the Bureau of Explosives' Closed Drum Apparatus (see Note 1), there is any explosion of the vapor-air mixture in the drum.

(4) It is an oxidizer. An oxidizer for the purpose of this subchapter is a substance such as a chlorate, permanganate, inorganic peroxide, or a nitrate, that yields oxygen readily to stimulate the combustion of organic matter (see Note 4).

(i) An organic compound containing the bivalent -O-O- structure and which may be considered a derivative of hydrogen peroxide where one or more of the hydrogen atoms have been replaced by organic radicals must be classed as an organic peroxide unless:

(A) The material meets the definition of a Class A explosive or a Class B explosive, as defined in §261.23(a)(8), in which case it must be classed as an explosive,

(B) The material is forbidden to be offered for transportation according to 49 CFR 172.101 and 49 CFR 173.21,

(C) It is determined that the predominant hazard of the material containing an organic peroxide is other than that of an organic peroxide, or

(D) According to data on file with the Pipeline and Hazardous Materials Safety Administration in the U.S. Department of Transportation (see Note 3), it has been determined that the material does not present a hazard in transportation.

(b) A solid waste that exhibits the characteristic of ignitability has the EPA Hazardous Waste Number of D001.

Note 1: A description of the Bureau of Explosives' Flame Projection Apparatus, Open Drum Apparatus, Closed Drum Apparatus, and method of tests may be procured from the Bureau of Explosives.

Note 2: As part of a U.S. Department of Transportation (DOT) reorganization, the Office of Hazardous Materials Technology (OHMT), which was the office listed in the 1980 publication of 49 CFR 173.300 for the purposes of approving sampling and test procedures for a flammable gas, ceased operations on February 20, 2005. OHMT programs have moved to the Pipeline and Hazardous Materials Safety Administration (PHMSA) in the DOT.

Note 3: As part of a U.S. Department of Transportation (DOT) reorganization, the Research and Special Programs Administration (RSPA), which was the office listed in the 1980 publication of 49 CFR 173.151a for the purposes of determining that a material does not present a hazard in transport, ceased operations on February 20, 2005. RSPA programs have moved to the Pipeline and Hazardous Materials Safety Administration (PHMSA) in the DOT.

Note 4: The DOT regulatory definition of an oxidizer was contained in §173.151 of 49 CFR, and the definition of an organic peroxide was contained in paragraph 173.151a. An organic peroxide is a type of oxidizer.

[45 FR 33119, May 19, 1980, as amended at 46 FR 35247, July 7, 1981; 55 FR 22684, June 1, 1990; 70 FR 34561, June 14, 2005; 71 FR 40259, July 14, 2006]

Characteristic of corrosivity (D002)

(a) A solid waste exhibits the characteristic of corrosivity if a representative sample of the waste has either of the following properties:

(1) It is aqueous and has a pH less than or equal to 2 or greater than or equal to 12.5, as determined by a pH meter using Method 9040C in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication SW-846, as incorporated by reference in §260.11 of this chapter.

(2) It is a liquid and corrodes steel (SAE 1020) at a rate greater than 6.35 mm (0.250 inch) per year at a test temperature of 55 °C (130 °F) as determined by Method 1110A in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication SW-846, and as incorporated by reference in §260.11 of this chapter.

(b) A solid waste that exhibits the characteristic of corrosivity has the EPA Hazardous Waste Number of D002.

[45 FR 33119, May 19, 1980, as amended at 46 FR 35247, July 7, 1981; 55 FR 22684, June 1, 1990; 58 FR 46049, Aug. 31, 1993; 70 FR 34561, June 14, 2005]

Characteristic of reactivity (D003)

(a) A solid waste exhibits the characteristic of reactivity if a representative sample of the waste has *any* of the following properties:

(1) It is normally unstable and readily undergoes violent change without detonating.

(2) It reacts violently with water.

(3) It forms potentially explosive mixtures with water.

(4) When mixed with water, it generates toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment.

(5) It is a cyanide or sulfide bearing waste which, when exposed to pH conditions between 2 and 12.5, can generate toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment.

(6) It is capable of detonation or explosive reaction if it is subjected to a strong initiating source or if heated under confinement.

(7) It is readily capable of detonation or explosive decomposition or reaction at standard temperature and pressure.

(8) It is a forbidden explosive as defined in 49 CFR 173.51, or a Class A explosive as defined in 49 CFR 173.53 or a Class B explosive as defined in 49 CFR 173.88.

(b) A solid waste that exhibits the characteristic of reactivity has the EPA Hazardous Waste Number of D003.

[45 FR 33119, May 19, 1980, as amended at 55 FR 22684, June 1, 1990]

Toxicity characteristic.

(a) A solid waste (except manufactured gas plant waste) exhibits the characteristic of toxicity if, using the Toxicity Characteristic Leaching Procedure, test Method 1311 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication SW-846, as incorporated by reference in §260.11 of this chapter, the extract from a representative sample of the waste contains any of the contaminants listed in table 1 at the concentration equal to or greater than the respective value given in that table. Where the waste contains less than 0.5 percent filterable solids, the waste itself, after filtering using the methodology outlined in Method 1311, is considered to be the extract for the purpose of this section.

(b) A solid waste that exhibits the characteristic of toxicity has the EPA Hazardous Waste Number specified in Table 1 which corresponds to the toxic contaminant causing it to be hazardous.

Table 1 —Maximum Concentration of Contaminants for the Toxicity Characteristic

EPA HW No.¹	Contaminant	CAS No.²	Regulatory Level (mg/L)
D004	Arsenic	7440-38-2	5.0
D005	Barium	7440-39-3	100.0
D018	Benzene	71-43-2	0.5
D006	Cadmium	7440-43-9	1.0
D019	Carbon tetrachloride	56-23-5	0.5
D020	Chlordane	57-74-9	0.03
D021	Chlorobenzene	108-90-7	100.0
D022	Chloroform	67-66-3	6.0
D007	Chromium	7440-47-3	5.0
D023	o-Cresol	95-48-7	⁴ 200.0

D024	m-Cresol	108-39-4	⁴ 200.0
D025	p-Cresol	106-44-5	⁴ 200.0
D026	Cresol		⁴ 200.0
D016	2,4-D	94-75-7	10.0
D027	1,4-Dichlorobenzene	106-46-7	7.5
D028	1,2-Dichloroethane	107-06-2	0.5
D029	1,1-Dichloroethylene	75-35-4	0.7
D030	2,4-Dinitrotoluene	121-14-2	³ 0.13
D012	Endrin	72-20-8	0.02
D031	Heptachlor (and its epoxide)	76-44-8	0.008
D032	Hexachlorobenzene	118-74-1	³ 0.13
D033	Hexachlorobutadiene	87-68-3	0.5
D034	Hexachloroethane	67-72-1	3.0
D008	Lead	7439-92-1	5.0
D013	Lindane	58-89-9	0.4
D009	Mercury	7439-97-6	0.2
D014	Methoxychlor	72-43-5	10.0
D035	Methyl ethyl ketone	78-93-3	200.0
D036	Nitrobenzene	98-95-3	2.0
D037	Pentachlorophenol	87-86-5	100.0
D038	Pyridine	110-86-1	³ 5.0
D010	Selenium	7782-49-2	1.0
D011	Silver	7440-22-4	5.0
D039	Tetrachloroethylene	127-18-4	0.7
D015	Toxaphene	8001-35-2	0.5
D040	Trichloroethylene	79-01-6	0.5
D041	2,4,5-Trichlorophenol	95-95-4	400.0
D042	2,4,6-Trichlorophenol	88-06-2	2.0
D017	2,4,5-TP (Silvex)	93-72-1	1.0
D043	Vinyl chloride	75-01-4	0.2

¹Hazardous waste number.

²Chemical abstracts service number.

³Quantitation limit is greater than the calculated regulatory level. The quantitation limit therefore becomes the regulatory level.

⁴If o-, m-, and p-Cresol concentrations cannot be differentiated, the total cresol (D026) concentration is used. The regulatory level of total cresol is 200 mg/l.

**Hazardous Waste Code Vermont Listed Hazardous Waste Hazard
VT02**

Waste containing greater than 5% by weight of petroleum distillates with melting points of less than 100oF, including but not limited to kerosene, fuel oil, hydraulic oils, lubricating oils, penetrating oils, tramp oils, quenching oils, and crankcase and automotive oils.

VT03

Note: Certain recycled or treated water-miscible metal cutting and grinding fluid wastes are exempted under § 7-203(l).

(T)

Pesticidal wastes and obsolete pesticidal products not specifically listed in subchapter 2.

VT06

Note: Certain pesticides managed in accordance with the universal waste management standards of subchapter 9 are exempted under § 7-203(s).

(T)

Waste ethylene glycol and solutions containing greater than 700 parts per million of ethylene glycol (e.g., coolants, antifreeze).

VT08

Note: Spent ethylene glycol and water-based ethylene glycol solutions that are recycled for reuse are exempted under § 7-204(i).

(T)

VT11 Wastes determined to be hazardous pursuant to § 7-213 or § 7-216. (I,T,C,R,H)

VT20

A solid material that when mixed with an equal weight of distilled water causes the liquid fraction of the mixture to exhibit the properties of the corrosivity characteristic as specified in § 7-206(a)(3).

(C,R)

N/A

For PCB swipes and bulk samples:

PCBs
Aroclor 1016
Aroclor 1221
Aroclor 1232
Aroclor 1242
Aroclor 1248
Aroclor 1254
Aroclor 1260

APPENDIX E
SAMPLING ANALYSIS

SAMPLING AND ANALYSES

Sample Type	General Location	Parameters	Methods	Estimated Investigative Samples		Field Quality Assurance Quality/ Control Samples						Estimated Totals	
				Number	Total	Matrix Duplicates		Matrix Spike Duplicates		Blanks			
						Number	Total	Number	Total	Number	Total		
Rinse Samples	Storage Bays	"Clean surface"	Visual										
	Rollers, ramps and Non-disposable equipment	"Clean surface"	Visual										
	Loading Dock and outdoor containment structures	"Clean surface"	Visual										
Swipe Samples	Laboratory	Polychlorinated Biphenyls	8082	2	2	1	1	1	1	1	1	1	5
	Warehouse Walls, Ceiling, Equipment	Polychlorinated Biphenyls	8082	8	8	1	1	1	1	1	1	1	11
	Breakroom, Office Area	Polychlorinated Biphenyls	8082	2	2	0	0	0	0	0	0	0	2
Bulk Samples	Storage Bays D-2 & D-5	Polychlorinated Biphenyls	8082	5	5	0	0	0	0	0	0	0	5
	Staging Area	Polychlorinated Biphenyls	8082	47	47	4	4	2	2	1	1	1	54
	Loading Dock	Polychlorinated Biphenyls	8082	6	6	1	1	1	1	1	1	1	9
	Laboratory Floor	Polychlorinated Biphenyls	8082	1	1	0	0	0	0	0	0	0	1

PCB SAMPLES

LOCATION	Dimensions	Area	Number of Samples
Bay D-2	30' x 4'	120 FT2	3
Bay D-5	20' x 4'	80 FT2	2
Staging Area	"L" shape:		
	Area 1: 18' x 122'		26
	Area 2: 24' x 68'		21
Loading dock	9.76' x 53'	512 FT2	6
Lab Floor	7' x 10'	70 FT2	1
	TOTAL		59

APPENDIX F
CLOSURE COST ESTIMATE

WASTE INVENTORY TRANSPORTATION AND DISPOSAL

DESCRIPTION	LOCATION/ CELL NOS.	NO. OF UNITS OR QUANTITY (see note #3)	UNIT DESCRIPTION	UNIT COST	TOTAL COST
FLAMMABLE LIQUIDS/SOLVENTS	B1, B2, B3, B4	647	55 GALLON	\$40.00	\$25,880.00
FLAMMABLE SOLIDS/INCINERATION	B5, B6	235	55 GALLON	\$95.00	\$22,325.00
ALKALINES	C1	353	55 GALLON	\$150.00	\$52,950.00
ACIDS	C2	235	55 GALLON	\$150.00	\$35,250.00
CLASS 9/RCRA LANDFILL	D1	265	55 GALLON	\$105.00	\$27,825.00
LABPACKS	D2, D3, D4, D6	518	55 GALLON	\$325.00	\$168,350.00
PCB'S	D5	100	55 GALLON	\$300.00	\$30,000.00
DECONTAMINATION FLUIDS (See note #2)	N/A	12,285 GALLONS	BULK	\$0.10	\$1,228.50
DECONTAMINATION SOLIDS/PPE/MISC	N/A	3	55 GALLON	\$125.00	\$375.00
				*SUBTOTAL (2006)	\$ 364,183.50
(See note #1)				2010 SUBTOTAL	\$ 422,828.65

* Notes:

1. Waste transportation and disposal quotes obtained in 11/06 and updated to 2010 costs utilizing the U.S. government implicit price deflator factor: $112.726/134.305 = 16.1\%$ increase
2. "Containment fluids" volume is calculated utilizing the 50% of the maximum containment volume of all the permitted storage cells- 24,570 gallons x 0.50 (See Section D)
3. "Bay A-1" (receiving area) inventory incorporated in Bays B-D inventory, as follows:

DESCRIPTION	LOCATION/ BAY NOS. & QUANTITY	PERCENT %	PERCENT A-1 ASSIGNED	NO. OF UNITS FROM FROM A-1	TOTAL QUANTITY
FLAMMABLE LIQUIDS/SOLVENTS	B1, B2, B3, B4 440 x 55's	440/1600 27.5%	27.5% of 753= 207	207 x 55's	647
FLAMMABLE SOLIDS/INCINERATION	B5, B6 160 x 55's	160/1600 10%	10% of 753= 75	75 x 55's	235
ALKALINES	C1 240 x 55's	240/1600 15%	15% of 753= 113	113 x 55's	353
ACIDS	C2 160 x 55's	160/1600 10%	10% of 753= 75	75 x 55's	235

CLASS 9/RCRA LANDFILL	D1 180 x 55's	180/1600 11.25%	11.25% of 753= 85	85 x 55's	265
LABPACKS (see note #1)	D2, D3, D4, D6 380 x 55's	N/A	See note 1	138 x 55's	518
PCB'S	D5 40 x 55's	Max allowed per TSCA approval-100 total	Max allowed per TSCA approval- 60	60 x 55's	100
TOTALS	1600 x 55's	100%	100%	753 x 55's	2353

Note(s):

1. "Labpack" inventory assigned from Bay A-1: Total A-1 inventory (753) minus Bay nos. B1,B2,B3,B4,B5,B6,C1,C2,D1,D5 (615)= 138 x 55's

VERMONT WASTE TAX:

TAX RATE 1	537,072 POUNDS	\$ 0.03/POUND	\$16,112.16
TAX RATE 2	537,072 POUNDS	\$ 0.01/POUND	\$ 5,370.75
		SUBTOTAL	\$21,482.91

TRANSPORTATION OF WASTE MATERIALS:

BULK DECONTAMINATION FLUIDS	3 BULK TRIPS	\$ 1,540.00/TRIP	\$ 4,620.00
VAN TRAILER LOADS OF RCRA WASTES	30 VAN TRAILER LOADS	\$ 1,000.00/TRIP	\$ 30,000.00
		SUBTOTAL	\$ 34,620.00

DECONTAMINATION AND SAMPLE COLLECTION:

DECONTAMINATION/SAMPLING LABOR-RCRA UNITS	5 CREW & EQUIPMENT DAYS	\$ 2,500.00/DAY	\$ 12,500.00
DECONTAMINATION/SAMPLING LABOR-TSCA UNITS	5 CREW & EQUIPMENT DAYS	\$ 2,500.00/DAY	\$ 12,500.00
		SUBTOTAL	\$ 25,000.00

LABORATORY SAMPLES/ANALYSIS:

SWIPE SAMPLES FOR PCB'S	18 SAMPLES	\$ 52.50/SAMPLE	\$ 945.00
CONCRETE SAMPLES FOR PCB'S	69 SAMPLES	\$ 72.00/SAMPLE	\$ 4,968.00
RINSATE (2 x 55 gallon drums and 3 tank trucks)	5 SAMPLES	\$ 839.00	\$ 4,195.00
SOLIDS FROM DECONTAMINATION/PPE	3 SAMPLES	\$ 1,580.00	\$ 4,740.00
		SUBTOTAL	\$ 14,848.00

CERTIFICATION/PROFESSIONAL SERVICES:

RCRA CERTIFICATION	1 LUMP SUM	\$ 5,000.00	\$ 5,000.00
TSCA CERTIFICATION	1 LUMP SUM	\$ 5,000.00	\$ 5,000.00
		SUBTOTAL	\$ 10,000.00

SUBTOTAL: \$ 528,780.00

TEN PERCENT CONTINGENCY FEE: \$ 52,878.00

TOTAL ESTIMATED CLOSURE COST (2010 DOLLARS): \$ 581,658.00

APPENDIX G
CLOSURE SCHEDULE

**Anticipated Final Closure Schedule
ENPRO Services of Vermont, Inc.**

Task	Days																			
	0	15	30	45	60	75	90	105	120	135	150	165	180	195	210	225	240	255	270	
1. Notify EPA of intent to close.	*																			
2. Receive final volume of waste.																				
3. Remove waste in storage for off-site disposal.																				
4. Decontaminate permitted units and appurtenances. Containerize decontamination liquids.																				
5. Sample, analyze, characterize, and dispose of decontamination fluids.																				
6. Perform inspections of decontaminated facilities. (Independent Engineer or his representative will be present or will perform these activities.) Repeat procedures as necessary.																				
7. Conduct soil borings, sample, and analyze, if necessary.																				
8. Excavate and dispose of contaminated soil and/or concrete, if necessary.																				
9. Perform verification sampling and analysis and site restoration. (Independent Engineer.)																				
10. Complete closure activities.																				
11. Certify closure and submit certification of closure to EPA. (Independent Engineer)																				*

* = submittal to EPA

APPENDIX H
CLOSURE CERTIFICATION STATEMENT

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

US EPA ID Number: VTR000517052

EVI Services of Vermont, Inc.

_____	_____	_____
Signature of Responsible Officer	Title	Date
_____	_____	_____
Signature of VT. Licensed P.E.	Registration Number	Date

APPENDIX I
FINANCIAL ASSURANCE AND
INSURANCE DOCUMENTS

**Banknorth, N.A.**

Date: March 7, 2003

TD Banknorth, N.A.
17 New England Executive Park
1st Floor
Burlington, MA 01803**IRREVOCABLE STANDBY LETTER OF CREDIT NUMBER 20002163****BENEFICIARY**State of Vermont - Agency of Natural Resources
c/o Mr. Peter Marshall
103 S. Main Street, West Office Building
Waterbury, VT 05671**CUSTOMER**ENERO Services of Vermont, Inc.
54 Avenue D
Williston, VT 05495
Attn: David A. Cowie, President

Gentlemen:

We hereby amend our Irrevocable Standby Letter of Credit Number 20002163
Amendment Number 1

- Delete the following statement: (2) Your signed statement reading as follows: "I certify that the amount of the draft is payable pursuant to regulations issued under authority of the Resource Conservation and Recovery Act of 1976 as amended."
- Insert the following statement: (2) Your signed statement reading as follows: "I certify that the amount of the draft is payable pursuant to regulations issued under authority of the Resource Conservation and Recovery Act of 1976 and the "Toxic Substance Control Act as amended."
- Delete the following statement: We certify that the above wording of this Letter of credit is identical to the wording specified in 40 C.F.R. § 264.151 (d) as such regulations were constituted on the date shown immediately below.
- Insert the following statement: We certify that the above wording of this Letter of credit is identical to the wording specified in 40 CFR § 264.151 (d) and in 40 CFR 761.65 (g) (4) (referencing 40 CFR 264.151 (d) as such regulations were constituted on the date shown immediately below. oik

**PAGE 2 OF AMNEDMENT TO IRREVOCABLE
STANDBY LETTER OF CREDIT NUMBER 20002163**

All demands for payment and all other communications to the Bank relative to this Letter of Credit shall be in writing and addressed and presented to TD Banknorth, N.A., International Banking, 17 New England Executive Park, 1st Floor, Burlington, MA 01803.

All other terms and conditions remain unchanged. This amendment is considered an integral part of the Letter of Credit and must be attached thereto.

This amendment is subject to the Uniform Customs and Practice for Documentary Credits, 2007 Revision, International Chamber of Commerce Publication No. 600

TD Banknorth N.A.

By: 

G. Thomas Maslin

Its:

Vice President

Please address all inquiries related to the contents of this item to the above address, Attn: International Banking, Standby Letter of Credit Dept., or by calling: Tom Maslin @ (781) 229-7139, Mila Kaminsky @ (781) 229-7140 or John Amuzzini @ 781-229 7141. Our Fax # (781) 229-7127

STANDBY TRUST AGREEMENT

STANDBY TRUST AGREEMENT, the "Agreement," entered into as of October 30 2007, by and between ENPRO Services of Vermont, Inc., a Maine Corporation, the "Grantor," and TD Banknorth, a national bank, the "Trustee."

WHEREAS, the State of Vermont Agency of Natural Resources (hereinafter referred to as "Agency"), an agency of the State of Vermont, and the United States Environmental Protection Agency, "EPA," an agency of the United States Government, has established certain regulations applicable to the Grantor, requiring that an owner or operator of a hazardous waste management facility shall provide assurance that funds will be available when needed for closure and/or post-closure care of the facility;

WHEREAS, the Grantor has elected to establish a trust to provide all or part of such financial assurance for the facilities identified herein;

WHEREAS, the Grantor, acting through its duly authorized officers, has selected the Trustee to be the Trustee under this Agreement, and the Trustee is willing to act as Trustee; and

NOW, THEREFORE, the Grantor and the Trustee agree as follows:

Section 1. Definitions. As used in this Agreement:

- (a) The term "Grantor" means the owner or operator who enters into this Agreement and any successors or assigns of the Grantor.
- (b) The term "Trustee" means the Trustee who enters into this Agreement and any successor Trustee.

Section 2. Identification of Facilities and Cost Estimates. This Agreement pertains to the facilities and cost estimates identified on attached Schedule A.

Section 3. Establishment of Fund. The Grantor and the Trustee hereby establish a trust fund, the "Fund," for the benefit of the Agency and EPA. The Grantor and the Trustee intend that no third party have access to the Fund except as herein provided. The Fund is established initially as consisting of the property, which is acceptable to the Trustee, described in Schedule B attached hereto. Such property and any other property subsequently transferred to the Trustee is referred to as the Fund, together with all earnings and profits thereon, less any payments or distributions made by the Trustee pursuant to this Agreement. The Fund shall be held by the Trustee, IN TRUST, as hereinafter provided. The Trustee shall not be responsible nor shall it undertake any responsibility for the amount or adequacy of, nor any duty to collect from the Grantor, any payments necessary to discharge any liabilities of the Grantor established by the Agency and/or EPA.

Section 4. Payment for Closure and Post-Closure Care. The Trustee shall make payments from the Fund as the Secretary of the Agency of Natural Resources for the State of Vermont (hereinafter referred to as "Secretary") and/or the EPA Regional Administrator (hereinafter referred to as "Administrator") shall direct, in writing, to provide for the payment of the costs of closure and/or post-closure care of the facilities covered by this Agreement. The Trustee shall reimburse the Grantor or other persons as specified by the EPA Regional Administrator from the Fund for closure and post-closure expenditures in such amounts as the EPA Regional Administrator shall direct in writing. In addition, the Trustee shall refund to the Grantor such amounts as the EPA Regional Administrator specifies in writing. Upon refund, such funds shall no longer constitute part of the Fund as defined herein.

Section 5. Payments Comprising the Fund. Payments made to the Trustee for the Fund shall consist of cash or securities acceptable to the Trustee.

Section 6. Trustee Management. The Trustee shall invest and reinvest the principal and income of the Fund and keep the Fund invested as a single fund, without distinction between principal and income, in accordance with general investment policies and guidelines which the Grantor may communicate in writing to the Trustee from time to time, subject, however, to the provisions of this Section. In investing, reinvesting, exchanging, selling, and managing the Fund, the Trustee shall discharge his duties with respect to the trust fund solely in the interest of the beneficiary and with the care, skill, prudence, and diligence under the circumstances then prevailing which persons of prudence, acting in a like capacity and familiar with such matters, would use in the conduct of an enterprise of a like character and with like aims; *except that:*

- (i) Securities or other obligations of the Grantor, or any other owner or operator of the facilities, or any of their affiliates as defined in the Investment Company Act of 1940, as amended, 15 U.S.C. 80A-2.(a), shall not be acquired or held, unless they are securities or other obligations of the Federal or a State government;
- (ii) The Trustee is authorized to invest the Fund in time or demand deposits of the Trustee, to the extent insured by an agency of the Federal or State government; and
- (iii) The Trustee is authorized to hold cash awaiting investment or distribution uninvested for a reasonable time and without liability for the payment of interest thereon.

Section 7. Commingling and Investment. The Trustee is expressly authorized in its discretion:

- (a) To transfer from time to time any or all of the assets of the Fund to any common, commingled, or collective trust fund created by the Trustee in which the Fund is eligible to participate, subject to all of the provisions thereof, to be commingled with the assets of other trusts participating therein; and

- (b) To purchase shares in any investment company registered under the Investment Company Act of 1940, 15 U.S.C. 80a-1 et seq., including one which may be created, managed, underwritten, or to which investment advice is rendered or the shares of which are sold by the Trustee. The Trustee may vote such shares in its discretion.

Section 8. Express Powers of Trustee. Without in any way limiting the powers and discretions conferred upon the Trustee by the other provisions of this Agreement or by law, the Trustee is expressly authorized and empowered:

- (a) To sell, exchange, convey, transfer, or otherwise dispose of any property held by it, by public or private sale. No person dealing with the Trustee shall be bound to see to the application of the purchase money or to inquire into the validity or expediency of any such sale or other disposition;
- (b) To make, execute, acknowledge, and deliver any and all documents of transfer and conveyance and any and all other instruments that may be necessary or appropriate to carry out the powers herein granted;
- (c) To register any securities held in the Fund in its own name or in the name of a nominee and to hold any security in bearer form or in book entry, or to combine certificates representing such securities with certificates of the same issue held by the Trustee in other fiduciary capacities, or to deposit or arrange for the deposit of such securities in a qualified central depository even though, when so deposited, such securities may be merged and held in bulk in the name of the nominee of such depository with other securities deposited therein by another person, or to deposit or arrange for the deposit of any securities issued by the United States Government, or any agency or instrumentality thereof, with a Federal Reserve bank, but the books and records of the Trustee shall at all times show that all such securities are part of the Fund;
- (d) To deposit any cash in the Fund in interest-bearing accounts maintained or savings certificates issued by the Trustee, in its separate corporate capacity, or in any other banking institution affiliated with the Trustee, to the extent insured by an agency of the Federal or State government; and
- (e) To compromise or otherwise adjust all claims in favor of or against the Fund.

Section 9. Taxes and Expenses. All taxes of any kind that may be assessed or levied against or in respect of the Fund and all brokerage commissions incurred by the Fund shall be paid from the Fund. All other expenses incurred by the Trustee in connection with the administration of this Trust, including fees for legal services rendered to the Trustee, the compensation of the Trustee to the extent not paid directly by the Grantor, and all other proper charges and disbursements of the Trustee shall be paid from the Fund.

Section 10. Annual Valuation. The Trustee shall annually, at least 30 days prior to the anniversary date of establishment of the Fund, furnish to the Grantor and to the appropriate Secretary and Administrator a statement confirming the value of the Trust. Any securities in the Fund shall be valued at market value as of no more than 60 days prior to the anniversary date of establishment of the Fund. The failure of the Grantor to object in writing to the Trustee within 90 days after the statement has been furnished to the Grantor and the Secretary and Administrator shall constitute a conclusively binding assent by the Grantor, barring the Grantor from asserting any claim or liability against the Trustee with respect to matters disclosed in the statement.

Section 11. Advice of Counsel. The Trustee may from time to time consult with counsel, who may be counsel to the Grantor, with respect to any question arising as to the construction of this Agreement or any action to be taken hereunder. The Trustee shall be fully protected, to the extent permitted by law, in acting upon the advice of counsel.

Section 12. Trustee Compensation. The Trustee shall be entitled to reasonable compensation for its services as agreed upon in writing from time to time with the Grantor.

Section 13. Successor Trustee. The Trustee may resign or the Grantor may replace the Trustee, but such resignation or replacement shall not be effective until the Grantor has appointed a successor trustee and this successor accepts the appointment. The successor trustee shall have the same powers and duties as those conferred upon the Trustee hereunder. Upon the successor trustee's acceptance of the appointment, the Trustee shall assign, transfer, and pay over to the successor trustee the funds and properties then constituting the Fund. If for any reason the Grantor cannot or does not act in the event of the resignation of the Trustee, the Trustee may apply to a court of competent jurisdiction for the appointment of a successor trustee or for instructions. The successor trustee shall specify the date on which it assumes administration of the trust in a writing sent to the Grantor, the Secretary and Administrator, and the present Trustee by certified mail 10 days before such change becomes effective. Any expenses incurred by the Trustee as a result of any of the acts contemplated by this Section shall be as provided in Section 9.

Section 14. Instructions to the Trustee. All orders, requests, and instructions by the Grantor to the Trustee shall be in writing, signed by such persons as are designated in the attached Exhibit A or such other designees as the Grantor may designate by amendment to Exhibit A. The Trustee shall be fully protected in acting without inquiry in accordance with the Grantor's orders, requests, and instructions. All orders, requests, and instructions by the Secretary and/or Administrator to the Trustee shall be in writing, signed by the Secretary and/or Administrator, or their designee(s), and the Trustee shall act and shall be fully protected in acting in accordance with such orders, requests, and instructions. The Trustee shall have the right to assume, in the absence of written notice to the contrary, that no event constituting a change or a termination of the authority of any person to act on behalf of the Grantor or the Agency and/or EPA hereunder has occurred. The Trustee shall have no duty to act in the absence of such orders, requests,

and instructions from the Grantor and/or the Agency and/or EPA, except as provided for herein.

Section 15. Notice of Nonpayment. The Trustee shall notify the Grantor and the appropriate Secretary and Administrator, by certified mail within 10 days following the expiration of the 30-day period after the anniversary of the establishment of the Trust, if no payment is received from the Grantor during that period. After the pay-in period is completed, the Trustee shall not be required to send a notice of nonpayment.

Section 16. Amendment of Agreement. This Agreement may be amended by an instrument in writing executed by the Grantor, the Trustee, and the appropriate Secretary and Administrator, or by the Trustee and the appropriate Secretary and Administrator if the Grantor ceases to exist.

Section 17. Irrevocability and Termination. Subject to the right of the parties to amend this Agreement as provided in Section 16, this Trust shall be irrevocable and shall continue until terminated at the written agreement of the Grantor, the Trustee, and the Secretary and Administrator, or by the Trustee and the Secretary and Administrator, if the Grantor ceases to exist. Upon termination of the Trust, all remaining trust property, less final trust administration expenses, shall be delivered to the Grantor.

Section 18. Immunity and Indemnification. The Trustee shall not incur personal liability of any nature in connection with any act or omission, made in good faith, in the administration of this Trust, or in carrying out any directions by the Grantor or the Secretary and/or Administrator issued in accordance with this Agreement. The Trustee shall be indemnified and saved harmless by the Grantor or from the Trust Fund, or both, from and against any personal liability to which the Trustee may be subjected by reason of any act or conduct in its official capacity, including all expenses reasonably incurred in its defense in the event the Grantor fails to provide such defense.

Section 19. Choice of Law. This Agreement shall be administered, construed, and enforced according to the laws of the State of Vermont.

Section 20. Interpretation. As used in this Agreement, words in the singular include the plural and words in the plural include the singular. The descriptive headings for each section of this Agreement shall not affect the interpretation or the legal efficacy of this Agreement.

In Witness Whereof the parties have caused this Agreement to be executed by their respective officers duly authorized and their corporate seals to be hereunto affixed and attested as of the date first above written: The parties below certify that the wording of this Agreement is identical to the wording specified in 40 C.F.R. 264.151(a)(1) as such regulations were constituted on the date first above written.

ENPRO Services of Vermont, Inc.

By: David A. Cowie
Signature of Grantor

David A. Cowie
Name of Grantor Printed or Typed

President
Title of Grantor

Attest:

Kath J. [Signature]
Signature

NOTE: ENPRO Services of Vermont, Inc. does not use a corporate seal.

State of MASS.
County of MIDDLESEX

On this 1st day of November, 2007, before me personally came DAVID A. COWIE to me known, who, being by me duly sworn, did depose and say that he/she resides at Newbury MA [city, state]; that he/she is President [title] of ENPRO Services of Vermont, Inc., the corporation described in and which executed the above instrument; that he/she knows the seal of said corporation; that the seal affixed to such instrument is such corporate seal; that it was so affixed by order of the Board of Commissioners of said corporation, and that he/she signed his/her name thereto by like order.

[Signature]
Signature of Notary Public

GERISE JALELIAN
NOTARY PUBLIC
Commonwealth of Massachusetts
My Commission Expires
August 31, 2012

My Commission Expires: _____
My County of Residence is: MIDDLESEX

Kelly A Ross

Signature of Trustee

Kelly A. Ross, APT + Weather Advisor

Name of Trustee Printed or Typed

TD Banknorth, N.A.

Title of Trustee

Attest:

Lisa Northrup
Signature

State of Vermont
County of Orleans

The foregoing instrument was acknowledged before me this 30th day of October, 2007, by Kelly A Ross [name of person acknowledged].

Lisa Northrup
Signature of Notary Public

Signature of Notary Public

Lisa Northrup

Name of Notary Public PRINTED

My Commission Expires: 2/10/11

SCHEDULE A

IDENTIFICATION OF FACILITY AND CLOSURE COST ESTIMATE

NAME OF FACILITY: ENPRO Services of Vermont, Inc.

ADDRESS: 54 Avenue D, Williston, Vermont

EPA IDENTIFICATION NUMBER: [To Be Assigned]

CURRENT CLOSURE COST ESTIMATE: \$314,747.00

SCHEDULE B

PROPERTY INITIALLY CONSTITUTING THE FUND

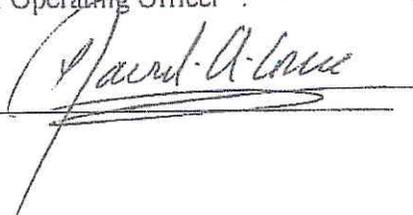
THIS TRUST IS NOT CURRENTLY FUNDED.

EXHIBIT A

GRANTOR'S DESIGNEES FOR SIGNING WRITTEN
INSTRUCTIONS TO THE TRUSTEE

DAVID A. COWIE, Chief Operating Officer . President

Specimen Signature: *

A handwritten signature in cursive script, appearing to read "David A. Cowie", is written over a horizontal line. A vertical line descends from the end of the signature.



Banknorth, N.A.

TD Banknorth, N.A.
17 New England Executive Park
1st Floor, Mail Stop: MA197-13
Burlington, MA 01803

IRREVOCABLE STANDBY LETTER OF CREDIT

Date of Issue: November 5, 2007
Date of Expiry: November 4, 2008
Letter of Credit Number 20002163
Issuer: TD Banknorth, N.A.

BENEFICIARY

State of Vermont - Agency of Natural Resources
c/o Mr. Peter Marshall
103 S. Main Street, West Office Building
Waterbury, VT 05671

CUSTOMER/APPLICANT

ENPRO Services of Vermont, Inc.
54 Avenue D
Williston, VT 05495
Attn: David A. Cowie, President

Dear Sir or Madam:

We hereby establish our Irrevocable Standby Letter of Credit Number 20002163 in your favor, at the request and for the account of ENPRO Services of Vermont, Inc., for the facility located at 54 Avenue D, Williston, Vermont, in the aggregate amount of Three Hundred Fourteen Thousand Seven Hundred Forty-Seven and 00/100 United States Dollars (US\$314,747.00) available upon presentation of:

- (1) Your sight draft, bearing reference to this Letter of Credit Number 20002163, and
- (2) Your signed statement reading as follows: "I certify that the amount of the draft is payable pursuant to regulations issued under authority of the Resource Conservation and Recovery Act of 1976 as amended."

This Letter of Credit is effective as of November 5, 2007, and shall expire on November 4, 2008, later, but such expiration date shall be automatically extended for a period of one year on that date and on each successive expiration date, unless, at least 120 days before the current expiration date, we notify both you and ENPRO Services of Vermont, Inc. by certified mail that we have decided not to extend this Letter of Credit beyond the current expiration date. In the event you are so notified, any unused portion of the credit shall be available upon presentation of your sight draft for 120 days after the date of receipt by both you and ENPRO Services of Vermont, Inc., as shown on the signed return receipts.

PAGE 2 OF IRREVOCABLE STANDBY LETTER OF CREDIT NUMBER 20002163

Whenever this Letter of Credit is drawn on under and in compliance with the terms of this credit, we shall duly honor such draft upon presentation to us, and we shall deposit the amount of the draft directly into the ENPRO Services of Vermont, Inc., Irrevocable Standby Trust Agreement dated October 30, 2007, in accordance with your instructions.

Drawings hereunder are to be directed to TD Banknorth, N.A., c/o International Dept., 17 New England Executive Park, 1st Floor, Burlington, MA 01803. Unless otherwise instructed herein, all inquiries regarding this transaction may be addressed/directed to G. Thomas Maslin at (781) 229-7139. Please include our reference number in all correspondence or have it available when you telephone.

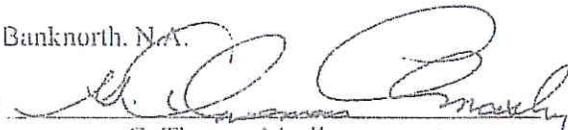
We hereby agree with you that drafts drawn under and in compliance with the terms and conditions of this letter of credit will be duly honored. Drafts drawn hereunder must be marked "Drawn under TD Banknorth, N.A., Irrevocable Standby Letter of Credit No. 20002163 dated November 5, 2007".

Except as otherwise specified herein, the letter of credit is subject to the Uniform Customs and Practice for Documentary Credits (2007, Revision), International Chamber of Commerce, Publication No. 600.

We certify that the above wording of this Letter of credit is identical to the wording specified in 40 C.F.R. § 264.151 (d) as such regulations were constituted on the date shown immediately below.

TD Banknorth, N.A.

By:

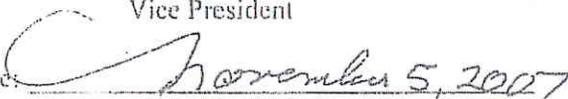


G. Thomas Maslin

Its:

Vice President

Date:



Please address all inquiries related to this item to the above address, Attn: International Banking, Standby Letter of Credit Dept., or by calling: Tom Maslin @ (781) 229-7139, Mila Kaminsky @ (781) 229-7140 or John Amazzini @ 781-229 7141. Our Fax # (781) 229-7127

**Hazardous Waste Facility
Certificate of Liability Insurance**

Named Insured: **ENPRO Services of Maine, Inc.**
Address: **106 Main Street, South Portland, Maine 04106**

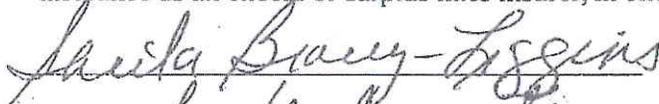
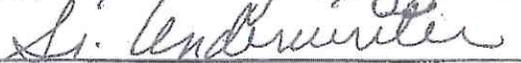
Carrier: **American International Specialty Lines Insurance Company**
Coverage: **General Liability – Pollution Legal Liability**
Policy Number: **EG 1951120**

1. American International Specialty Lines Insurance Company of 70 Pine Street, New York, NY hereby certifies that it has issued liability insurance covering bodily injury and property damage to ENPRO Services of Maine, Inc. in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at (BPA Number VTR000517052), ENPRO Services of Maine, 106 Main Street, South Portland, ME 04106 for "sudden" and "non-sudden accidental occurrences". The limits of liability are \$3,000,000 "each occurrence" and \$6,000,000 "annual aggregate", exclusive of legal defense cost. The coverage is provided under policy number EG1951120, issued on August 1, 2007. The effective date of said policy is August 1, 2007.
2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:
 - (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
 - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
 - (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA) and ANR Secretary, the Insurer agrees to furnish to the Regional Administrator and ANR Secretary a signed duplicate original of the policy and all endorsements.

**Hazardous Waste Facility
Certificate of Liability Insurance**

- (d) Cancellation of the insurance, whether by the insurer, the insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is received by the Regional Administrator of the EPA and ANR Secretary, Region(s) in which the facility is Located.
- (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator of the EPA and ANR Secretary, Region in which the facility is located.

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

American International Specialty Lines Insurance Company
70 Pine Street, New York, New York 10270

**Hazardous Waste Facility
Certificate of Liability Insurance**

Named Insured: **ENPRO Services of Vermont, Inc.**
Address: **54 Avenue D, Williston, VT 05495**

Carrier: **American International Specialty Lines Insurance Company**
Coverage: **General Liability – Pollution Legal Liability**
Policy Number: **EG 1951120**

1. American International Specialty Lines Insurance Company of 70 Pine Street, New York, NY hereby certifies that it has issued liability insurance covering bodily injury and property damage to ENPRO Services of Vermont, Inc. in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at (EPA Number VTR000517052), ENPRO Services of Vermont, 54 Avenue D, Williston, Vermont 05495 for "sudden and non-sudden accidental occurrences". The limits of liability are \$3,000,000 "each occurrence" and \$6,000,000 "annual aggregate", exclusive of legal defense cost. The coverage is provided under policy number EG1951120, issued on August 1, 2007. The effective date of said policy is August 1, 2007.
2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:
 - (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
 - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
 - (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA) and ANR Secretary, the Insurer agrees to furnish to the Regional Administrator and ANR Secretary a signed duplicate original of the policy and all endorsements.

**Hazardous Waste Facility
Certificate of Liability Insurance**

- (d) Cancellation of the insurance, whether by the insurer, the insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is received by the Regional Administrator of the EPA and ANR Secretary, Region(s) in which the facility is Located.
- (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator of the EPA and ANR Secretary, Region in which the facility is located.

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

Shirley Bracey Leggett
S. Linderwiler

American International Specialty Lines Insurance Company
70 Pine Street, New York, New York 10270

APPENDIX J
PCB CONCRETE SAMPLING

REGION I, EPA-NEW ENGLAND

DRAFT STANDARD OPERATING PROCEDURE FOR SAMPLING CONCRETE IN THE FIELD



U.S. EPA-NEW ENGLAND
Region I
Quality Assurance Unit Staff
Office of Environmental Measurement and Evaluation

Prepared by: **Alan W Peterson**
Quality Assurance Chemist

Date: 12/30/97

Reviewed by: **Andrew Beliveau**
Senior Technical Specialist

Date: 12/30/97

Approved by: **Nancy Barmakian**
Branch Chief

Date: 12/30/97

Region I, EPA New England

Standard Operating Procedure for Sampling Concrete in the Field

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Region I, EPA New England

Standard Operating Procedure for Sampling Concrete in the Field

1.0 Scope and Application

The following Standard Operating Procedure (SOP) describes a concrete sampling technique which uses an impact hammer drill to generate a uniform, finely ground, powder which is easily homogenized, extracted and analyzed. This procedure is primarily geared at providing enough sample for one or two different analyses at a time. That is, the time required to generate sufficient sample for a full suite of analyses may be impractical. The concrete powder is suitable for all types of environmental analyses, with the exception of volatile compounds, and may be analyzed in the field or at a fixed laboratory. This procedure is applicable for the collection of samples from concrete floors, walls, and ceilings.

The impact hammer drill is far less labor intensive than previous techniques using coring devices, or hammers and chisels. It allows for easy selection of sample location and sample depth. Not only can the project planner control the depth to sample into the concrete, from surface samples (0 - ½ inch) down to a core of the entire slab, but the technique can also be modified to collect samples at discrete depths within the concrete slab.

Another issue with concrete sampling is the fact that the amount of time spent drilling translates into the weight of sample produced. Thus, to maximize sampling time, it is important to know the minimum amount of sample required for each analysis. To do this, the project planner should take the following steps: 1) Use the Data Quality Objective (DQO) process and familiarity with the site to develop the objectives of the sampling project and the depth(s) of sample to be collected. 2) Review the site history and any previous data collected to determine possible contaminants of concern. 3) Establish the action levels for those possible contaminants and determine the appropriate analytical methods (both field and/or fixed laboratory) to meet the DQOs of the project. 4) Based on the detection limits of these methods, determine the amount of sample required for each analysis and the total sample weight required for each sample location (including quality control samples).

As with any environmental data collection project, all aspects of a concrete sampling episode should be well thought out, prior to going out in the field, and thoroughly described in a Quality Assurance Project Plan (QAPP). The QAPP should clearly state the DQOs of the project and document a complete Quality Assurance/Quality Control program to reconcile the data generated with the established DQOs. For more information on these subjects, refer to EPA documents QA/R-5, EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations, and QA/G-4, Guidance for the Data Quality Objective Process.

2.0 Method Summary

A one-inch diameter carbide drill bit is used in a rotary impact hammer drill to generate a fine concrete powder suitable for analysis. The powder is placed in a sample container and homogenized for field or fixed laboratory analysis. The procedure can be used to sample a single depth into the concrete, or may be modified to sample the concrete at distinctly different depth zones. The modified depth sampling procedure is designed to minimize any cross contamination between the sampling zones. If different

sampling depths are required, two different diameter drill bits and a vacuum sampling apparatus are employed.

3.0 Health and Safety

Eye and hearing protection are required at all times during sample drilling. A small amount of dust is generated during the drilling process. Proper respiratory protection and/or a dust control system must be in place at all times during sampling.

4.0 Interferences and Potential Problems

Since this sampling technique produces a finely ground uniform powder, physical matrix effects from variations in the sample consistency (i.e., particle size, uniformity, homogeneity, and surface condition) are minimized. Matrix spike analysis of a sample is highly recommended to monitor for any matrix related interferences.

As stated in Section 1.0 above, this sampling procedure is not recommended for volatile organic compound (VOC) analysis. The combination of heat generated during drilling and the exposure of a large amount of surface area will greatly reduce VOC recovery. If low boiling point semi-volatile compounds (i.e., naphthalene) are being analyzed, then the drill speed should be reduced to minimize heat build-up.

5.0 Equipment and Supplies

5.1 Single Depth Concrete Sampling

- 5.1.1 Rotary impact hammer drill
- 5.1.2 1-inch diameter carbide drill bits
- 5.1.3 Stainless steel scoopulas
- 5.1.4 Stainless steel spoonulas (for collecting sample in deeper holes, >2-inches)
- 5.1.5 Rectangular aluminum pans (to catch concrete during wall and ceiling sampling)
- 5.1.6 Gasoline powered generator (if alternative power source is required)

5.2 Multiple Depth Sampling (in addition to all the above)

- 5.2.1 ½ inch diameter carbide drill bits
- 5.2.2 Vacuum/sample trap assembly (see Section 7.2 and Figure 1)
 - 5.2.2.1 Vacuum pump
 - 5.2.2.2 2-hole rubber stopper
 - 5.2.2.3 Glass tubing (to fit stopper)
 - 5.2.2.4 Large glass test tubes, or Erlenmeyer flasks, for sample trap (several are suggested)
 - 5.2.2.5 Polyethylene tubing for trap inlet (Tygon tubing may be used for the trap outlet)
 - 5.2.2.6 Pasture pipets
 - 5.2.2.7 Pipe cleaners
 - 5.2.2.8 In-line dust filter (glass fiber filter, or equivalent)

6.0 Sample Containers, Preservation, and Storage

Concrete samples must be collected in glass containers for organic analyses, and may be collected in either glass or plastic containers for inorganic analyses. In general, a 2-ounce sample container with Teflon-lined cap (wide-mouth jars are preferred) will hold sufficient volume for most analyses. A 2-ounce jar can hold roughly 90 grams sample. Note, samples which require duplicate and/or matrix spike/matrix spike duplicate analyses may require a larger sample container, or additional 2-ounce sample containers.

Organic samples are to be shipped on ice and maintained at 4EC (∇ 2EC) until the time of extraction and analysis. Inorganic samples may be shipped and stored at room temperature. Refer to 40 CFR Part 136 for guidelines on analysis holding times.

To maintain sample integrity, chain-of-custody procedures must be implemented at the time of sampling to 1) document all sample locations and associated field sample identification numbers, 2) document all quality control samples taken, including field duplicates, split samples for confirmatory analyses, and PE samples, and 3) document the transfer of field samples from field sampler to field chemist or fixed laboratory.

7.0 Procedure

7.1 Single Depth Concrete Sampling

Lock a 1-inch diameter carbide drill bit into the impact hammer drill and plug the drill into an appropriate power source. (A gasoline generator will be needed if electricity is not available.) For easy identification, sample locations may be pre-marked using a crayon or a non-contaminating spray paint. (Note, the actual drilling point must not be marked.) Depending on the appearance of the sample location, or the objectives of the sampling project, it may be desired to wipe the concrete surface with a clean dry cloth prior to drilling. All sampling decisions of this nature should be noted in the sampling logbook. Begin drilling in the designated location. Apply steady even pressure and let the drill do the work. Applying too much pressure will generate excessive heat and dull the drill bit prematurely. The drill will provide a finely ground concrete powder that can be easily collected, homogenized and analyzed. Having several decontaminated impact drill bits on hand will help expedite sampling when numerous sample locations are to be drilled.

Sample Collection

A ½-inch deep hole (using a 1-inch diameter drill bit) generates about 10 grams of concrete powder. Based on this and the action levels for the project, determine the sampling depth, and/or the number of sample holes to be composited, to generate sufficient sample volume for all of the required analyses. (Note, with the absorbency of concrete, a ½-inch deep hole can be considered a surface sample.)

A decontaminated stainless steel scoopula can be used to collect the sample. The powder can either be collected directly from the surface of the concrete and/or the concrete powder can be scraped back into the hole and the less rounded back edge of the scoopula can be used to collect the sample. For holes greater than 2-inches in depth, a stainless steel spoonula will make it easier to collect the sample from the bottom of the hole.

To ensure collection of a representative sample when multiple analyses are required, a concrete sample should always be collected and homogenized in a single container and then divided up into the individual containers for the various analyses or split samples. This is particularly important when sample holes are deep, or when several holes are drilled adjacent to each other to form a sample composite.

Wall and Ceiling Sampling

A team of two samplers will be required for wall and ceiling sampling. The second person will be needed to hold a clean catch surface (i.e., an aluminum pan) below the drill to collect the falling powder. For wall samples, a scoopula, or spoonula, can be used to collect remaining concrete powder from within the hole. For ceiling holes, it may be necessary to drill the hole at an angle so the concrete powder can fall freely in the collection pan (and avoid falling on the drill). Another alternative might be to use the chuck-end of the drill bit and punch a hole through the center of the collection pan. The drill bit is then mounted through the pan and into the drill. Thus, the driller can be drilling straight up while the assistant steadies the pan to catch the falling dust. As a precaution, it may be advantageous to tape a piece of plastic around the drill, just below the chuck, to avoid dust contaminating the body of the drill and entering the mechanical vents. (Note, the plastic should deflect dust from the drill, but be loose enough underneath to allow for proper ventilation.)

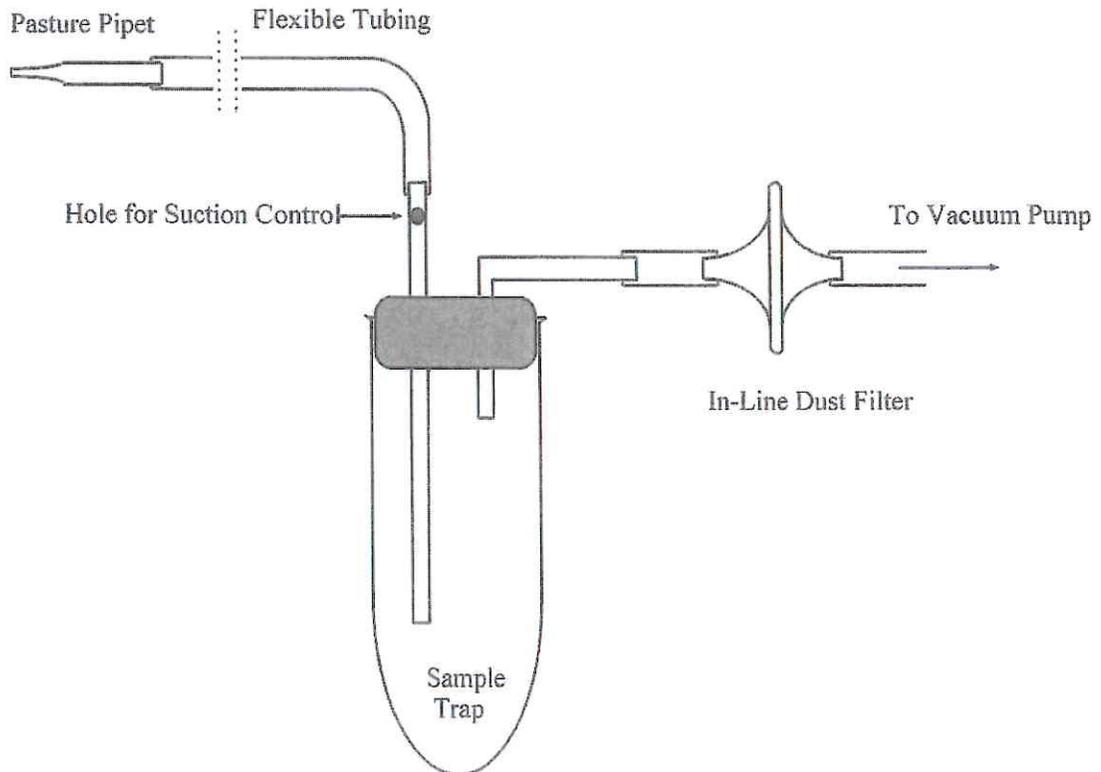
7.2 Multiple Depth Concrete Sampling

The above method for concrete sampling can also be used to collect samples from different depths within the concrete. To do this, two different sized drill bits (i.e., ½ inch and 1 inch) and a simple vacuum pump with a vacuum trap assembly is required (see Figure 1). First, the 1 inch drill bit is used to drill to the first level and the concrete sample is collected as described in Section 7.1. The vacuum pump is then turned on and the hole is cleaned out using the vacuum trap assembly. The drill bit is then changed to the ½ inch bit and the next depth is drilled out (the ½ inch bit is used to avoid contact with the sides of the first hole). A clean tube or flask is placed on the vacuum trap, and the sample from the second drilling is collected. To go further, the 1 inch drill is used to open up the hole to the second level, the hole is cleared, and then the ½ inch drill is used again to go to a third level, etc. Note, the holes and concrete surface should be vacuumed thoroughly to minimize any cross-contamination between sample depths.

Vacuum Trap Design and Clean-out

The trap presented in Figure 1 is a convenient and thorough way for collecting and removing concrete powder from drilled holes. The trap system is designed to allow for control of the suction from the vacuum pump and easy trap clean-out between samples. Note, by placing a hole in the inlet tube (see Figure 1), a finger on the hand holding the trap can be used to control the suction at the sampling tip. Thus, when this hole is left completely open, there will be no suction, and the sampler can have complete control over where and what to sample. To change-out between samples the following steps should be taken: 1) The pasture pipet and piece of polyethylene tubing at the sample inlet should be replaced with new materials, 2) the portion of the rubber stopper and glass tubing that was in the trap should be wiped down with a clean damp paper towel (wetted with deionized water) and then dried with a fresh paper towel, 3) a clean pipe cleaner should be drawn through the glass inlet tube to remove any concrete dust present, and 4) the glass tube or flask used to collect the sample should be swapped out with a clean decontaminated sample trap. Having several clean tubes or flasks on hand will facilitate change-out between samples.

Figure 1



7.3 Decontamination Procedure

Necessary supplies for decontamination include: two small buckets, a scrub brush, potable water, deionized water, a squirt bottle for the deionized water, and paper towels. The first bucket contains a soap and potable water solution, and the second bucket contains just potable water. Place all used drill bits and utensils in the soap and water bucket. Scrub each piece thoroughly using the scrub brush. Note, the concrete powder does cling to the metal surfaces, so care should be taken during this step, especially with the twists and curves of the drill bits. Next, rinse each piece in the potable water bucket, and follow with a deionized water rinse from the squirt bottle. Place the deionized water rinsed pieces on clean paper towels and individually dry and inspect each piece. Note, all pieces should be dry prior to reuse.

8.0 Field Documentation

All Site related documentation and reports generated from concrete sampling should be maintained in the central Site file. If personal logbooks are used, legible copies of all pertinent pages must be placed in the Site file.

8.1 Field Logbooks

All field documentation should be maintained in bound logbooks with numbered pages. If loose-leaf logsheets are used to document site activities, extra care should be taken in keep track of all logsheets.

The original copy of all logsheets should be maintained in the central Site file. Note, all sample locations must be documented by tying in their location to a detailed site map, or by using two or more permanent landmarks. The following information should be documented in the field logbooks:

- X Site name and location,
- X EPA Site Manager,
- X Name and affiliation of field samplers (EPA, Contractor company name, etc.),
- X Sampling date,
- X Sample locations and IDs,
- X Sampling times and depths, and
- X Other pertinent information or comments

8.2 Sample Labeling and Chain-of-Custody

8.2.1 Sample Labels

Sample labels will be affixed to all sample containers. Labels must contain the following information:

- X Project name,
- X Sample number, and/or location
- X Date and time of sampling,
- X Analysis,
- X Preservation, and
- X Sampler's name.

8.2.2 Chain-of-Custody

All samples must be traced from collection, to shipment, to laboratory receipt and laboratory custody. The Chain-of-Custody (COC) Record is a multi-part form that is initiated as samples are acquired and accompanies a sample (or group of samples) as they are transferred from person to person. The COC form is signed by all individuals responsible for sampling, sample transport, and laboratory receipt. (Note, overnight deliver services, often used with sample transport, are exempt from having to sign the COC form. However, copies of all shipping invoices must be kept with the COC documentation.) One copy of the COC is retained by the field sampling crew, while the original (top, signed copy) and remaining carbonless copies are placed in a zip-lock bag and taped to the inside lid of the shipping cooler. If multiple coolers are required for a sample shipment to a single laboratory, the COC need only be sent with one of the coolers. The COC should state how many coolers are included with the shipment. All sample shipments to different laboratories require individual COC forms. The original COC form accompanies the samples until the project is complete, and is then kept in the permanent project file. A copy of the COC is also kept with the project manager, the laboratory manager, and attached to the data package.

8.2.3 Custody Seal

The Custody seal is an adhesive-backed label which is also part of the chain-of-custody process. The custody seal is used to prevent tampering with the samples after they have been collected in the field and sealed in coolers for transit to the laboratory. The Custody seals are signed and dated by a sampler and affixed across the opening edges of each cooler containing samples. Clear packing tape should be wrapped around the cooler, and over the Custody seal, to secure the cooler and avoid accidental tampering with the Custody seal.

9.0 **Quality Assurance and Quality Control (QA/QC)**

A solid QA/QC program is essential to establishing the quality of the data generated so that proper project decisions can be made. The following are key quality control elements which should be incorporated into a concrete sampling and analytical program.

9.1 **Equipment Blanks**

An equipment blank should be performed on decontaminated drill bits and collection utensils at a frequency of 1 per 20 samples or 1 per day, whichever is greater. To prepare the equipment blank, place the decontaminated drill bit and utensils in a large clean stainless steel bowl. Pour sufficient deionized water into the bowl to fill all of the required sample containers. Next, stir the drill bit and utensils in the bowl with a clean utensil to thoroughly mix the blank. Finally, decant off the equipment blank into the sample containers. Note, a clean funnel may help to pour off the equipment blank into the containers.

9.2 **Field Duplicates**

Field duplicates are samples collected adjacent to each other (collocated) at the same sample location (not two aliquots of the same sample). Field duplicates not only help provide an indicator of overall precision, but measure the cumulative effects of both the field and analytical precision, and also measure the representativeness of the sample. Field duplicates must be prepared and analyzed at a frequency of 1 per 20 samples or 1 per non-related concrete matrix, whichever is greater. An example of a non-related concrete matrix might be the investigation of two different types of chemical spills.

Calculate the Relative Percent Difference (RPD) between the sample and its duplicate using Equation 1.

$$RPD = \frac{|S - D|}{\frac{(S + D)}{2}} \times 100$$

Equation 1

Where:

S = Original sample result
 D = Duplicate sample result

The following general guidelines have been established for field duplicate criteria:

- X If both the original and field duplicate values are \geq practical quantitation limit (PQL), then the control limit for RPD is # 50%,
- X If one or both values are $<$ PQL, then do not assess the RPD.

If more rigorous field duplicate criteria are needed to achieve project DQOs, then that criteria should be documented in the project QAPP.

If the field duplicate criteria specified above are not met, then flag that target element with an "*" on the final report for both the original and field duplicate samples. Report both the original and field duplicate analyses; do not report the average. Field duplicate samples should be indicated on the sample ID. For example, the sample ID can contain the suffix "FD".

9.3 Laboratory Duplicates

Laboratory duplicates are two aliquots of the same sample that are prepared, homogenized and analyzed in the same manner. (Note, proper sample homogenization is critical in producing meaningful results.) The precision of the sample preparation and analytical methods is determined by performing a laboratory duplicate analysis. Laboratory duplicates can be prepared in the field and submitted as blind samples, or the laboratory can be requested to perform the laboratory duplicate analysis. In the case of laboratory prepared duplicates, the field sampling team must be sure to provide sufficient sample volume. Laboratory duplicates must be prepared and analyzed at a frequency of 1 per 20 samples or 1 per non-related concrete matrix, whichever is greater.

Calculate the RPD between the sample and its duplicate using Equation 1. The following general guidelines have been established for laboratory duplicate criteria:

- X If both the original and laboratory duplicate values are \geq PQL, then the control limit for RPD is # 25%,
- X If one or both values are $<$ PQL, then do not assess the RPD.

If duplicate criteria are not met, then flag that target element with an "*" on the final report for both the original and duplicate samples. Report both the original and duplicate analyses; do not report the average.

9.4 Matrix Spike/Matrix Spike Duplicate Samples

Matrix spike/matrix spike duplicate samples (MS/MSDs) are two additional aliquots of a sample which are spiked with the appropriate compound(s) or analyte(s) of concern and then prepared and analyzed along with the original sample. (Note, proper sample homogenization, prior to spiking, is critical in producing meaningful results.) MS/MSDs help evaluate the effects of sample matrix on the analytical methods being used. The field sampling team must provide sufficient sample volume such that the field or fixed laboratory can prepare and analyze MS/MSDs at a frequency of 1 per 20 samples or 1 per non-related concrete matrix, whichever is greater.

Calculate the recovery of each matrix spike compound or analyte using Equation 2.

Equation 2

$$MSR = \frac{SSR - SR}{SA} \times 100$$

Where,

MSR = Matrix Spike Recovery, SA = Spike Added
 SSR = Spiked Sample Result, SR = Sample Result

Calculate the relative percent difference (RPD) between the recoveries of each compound or analyte in the matrix spike and matrix spike duplicate using Equation 3.

Equation 3

$$RPD = \frac{|MSR - MSR_D|}{\frac{(MSR + MSR_D)}{2}} \times 100$$

Where,

MSR = Matrix Spike Recovery
 MSR_D = Matrix Spike Duplicate Recovery

9.5 Performance Evaluation Samples

In accordance with the EPA Region I Performance Evaluation Program Guidance, performance evaluation (PE) samples should be submitted for each type of analysis to be performed in the field or by the fixed laboratory performing full protocol EPA methods. PE samples provide information on the quality of the individual data packages. PE samples are certified standard reference materials (SRMs) from a source other than that used to calibrate the instrument. If both field and fixed laboratories are being used to analyze samples, at least one solid PE sample should undergo both field analysis and confirmatory full protocol EPA method analysis to facilitate data comparability. A copy of the certified values for the SRM must be submitted with the final data packages to facilitate data evaluation.

9.6 Data Verification and Validation

All field data and supporting information (including chain-of-custody) that is collected during a concrete sampling episode should be verified daily, by a person other than that performing the work, to check for possible errors.

During the project planning process, a plan for data validation should be established for all data, both for field and fixed laboratories. All data must be validated to assure that it is of a quality suitable to make project decisions. For help in developing a data validation program refer to Region I, EPA New England, Data Validation Functional Guidelines for Evaluating Environmental Analyses.

9.7 Audits

9.7.1 Internal Audits

As part of the Quality Assurance/Quality Control Program for any sampling project, a series of internal audit checks should be instituted to monitor and maintain the integrity of the sample collection process. Timely internal reviews will insure that proper sampling, decontamination, chain-of-custody and quality control procedures are being followed. Also, the internal audit review is there to monitor any corrective actions taken, and/or institute corrective actions that should have been taken and were not. All corrective actions taken must be documented in an appropriate logbook, and if any corrective actions impact the final data reported, then they must also be documented in the final report narrative. The results of all internal audits must be documented in a report, and copies of the report issued to the Project Manager and the Quality Assurance Manager. The original copy of any audit report must remain with the main project file and be available for review.

9.7.2 External Audits

The Agency reserves the right to perform periodic field audits to ensure compliance with this SOP.

10.0 References

- 1) Guidance for the Data Quality Objective Process, QA/G-4, EPA/600/R-96/055, September 1994.
- 2) EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations, QA/R-5, Interim Final, October 1997.
- 3) Guidance for the Preparation of Standard Operating Procedures for Quality-related Operations, QA/G-6, EPA/600/R-96/027, November 1995.
- 4) Region I, EPA-New England Data Validation Functional Guidelines for Evaluating Environmental Analyses, July 1996.
- 5) EPA Region I Performance Evaluation Program Guidance, July 1996.
- 6) U.S. EPA Code of Federal Regulations, 40 CFR, Part 136, Appendix B, Revised as of July 1995.

APPENDIX K
PCB AUTHORIZATION



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

***CERTIFIED MAIL
RETURN RECEIPT REQUESTED***

MAY 16 2008

David A. Cowie, President
ENPRO Services of Vermont, Inc.
Whitcomb Industrial Park
54 Avenue D
Williston, Vermont 05495

Re: Commercial Storage of PCBs
EPA ID. No VTR 000 517 052

Dear Mr. Cowie:

The United States Environmental Protection Agency-New England (EPA) has determined that ENPRO Services of Vermont, Inc., 54 Avenue D, Williston, Vermont (ENPRO) meets the requirements of 40 CFR § 761.65(d)(6) to qualify for an exemption from the requirement to obtain approval as a commercial storer of PCB waste under the Toxic Substances Control Act, Section 6(e), 15 USC § 2605(e), and 40 CFR § 761.65(d).

This determination is based on the following findings:

1. The facility is permitted by the State of Vermont under the state's RCRA program, to operate as a hazardous waste storage facility and the certification for the facility was transferred to ENPRO by the State of Vermont Department of Environmental Conservation (VTDEC) on August 20, 2007;
2. The closure plan dated April 2008 is substantially equivalent to the closure plan requirements under 40 CFR §§ 761.65(d) through (g);
3. The closure cost estimate and financial assurance demonstration account for maximum PCB inventories;
4. The applicant has submitted relevant information bearing upon its qualifications to engage in the business of commercial storage of PCBs, as detailed in 40 CFR § 761.65(d)(3); and,

5. The applicant has certified that ENPRO is in compliance with 40 CFR § 761.65(b) and/or (c)(7), as required by 40 CFR § 761.65(d)(3).

Based upon these findings, EPA hereby exempts ENPRO from separate TSCA approval for the commercial storage of PCB waste, in accordance with 40 CFR § 761.65(d)(6) subject to the following conditions:

1. The RCRA certification upon which this exemption has been based must be in effect at all times. Upon expiration or revocation of the RCRA certification, this exemption will no longer be in effect. Any further PCB waste storage activity would then require separate TSCA approval.
2. This exemption applies to the storage areas identified as "D-2", "D-5", "Loading Dock", and "Staging Area" on Figure 2 of the Closure Plan.
3. The total inventory of PCB wastes stored at the facility shall not exceed one hundred 55-gallon drums or the volumetric equivalent thereof.
4. ENPRO must comply with all applicable federal, state and local regulations, including EPA's PCB Spill Cleanup Policy under 40 CFR Part 761, Subpart G (which applies to spills less than 72 hours old), during the cleanup, storage, handling, and disposal of all PCB waste.
5. Required submittals shall be mailed to:

Kimberly N. Tisa, PCB Coordinator
United States Environmental Protection Agency
1 Congress Street, Suite 1100 - CPT
Boston, Massachusetts 02114-2023
Telephone: (617) 918-1527
Facsimile: (617) 918-0527

6. This exemption is granted to ENPRO and is not transferable without prior written authorization from the EPA Regional Administrator or his designee. Furthermore, ENPRO shall notify EPA in writing prior to any departure from, changes, or modifications to the RCRA certification, warehousing design, closure plan, or financial assurance. Based on EPA's review of this information, EPA may require ENPRO to obtain a separate approval under TSCA as a commercial storer of PCB waste in the event that EPA determines that ENPRO no longer meets the exemption qualifications.

7. Any departure from the conditions of this exemption without prior, written authorization from EPA may result in the initiation of revocation, suspension or termination proceedings, as well as enforcement under TSCA.
8. Upon notice of revocation of this exemption, ENPRO shall have 30 days to initiate closure in accordance with the closure plan approved under the RCRA certification. No additional PCB wastes may be accepted by ENPRO after EPA's notice of revocation of this exemption.

Should you have any questions regarding this matter, please contact Kimberly Tisa in our Office of Site Remediation and Restoration at (617) 918-1527.

Sincerely,

Handwritten signature of Robert W. Varney in cursive, with the words "Acting for" written in a smaller, less legible script to the right of the main signature.

Robert W. Varney
Regional Administrator

cc: S. Simoes, VTDEC
File

APPENDIX L
PCB SAMPLING

Concrete Floors

For verification purposes, EVI will conduct bulk sampling at the loading dock, the staging area, storage cells D-2 and D-5 and the laboratory floor. These areas are shown Appendix B. The sampling will be conducted utilizing the U.S. EPA Region I "Draft Standard Operating Procedure For Sampling Concrete In The Field" guidance document or as otherwise revised (see Appendix J).

A square-based grid, with a grid interval of 5 feet (1.5 meters), will be superimposed over the areas that that need to be sampled. The sampling points within the selected grid will be appropriately marked or identified on the concrete floor with unique identifying numbers showing the actual grid location number as well as unique composite sample identification.

Moveable Equipment

Moveable equipment utilized for managing PCB's may be decontaminated in accordance with 40 CFR Part 761.79(c) or may be sampled and analyzed in accordance with 40 CFR Part 761 Subpart P, in lieu of following the decontamination procedures specified at 40 CFR Par 761.79(c). For the purposes of this closure plan, moveable equipment is defined as hand tools, the container roller system including supporting structures, fork trucks, and equipment that can be physically removed from the facility, assuming this equipment had the possibility of contacting PCB's during facility operations.

Laboratory

In addition, EVI will collect two swipe and one bulk samples for PCBs from the on-site laboratory in order to assess whether or not PCB's are present in an unregulated area of the facility. The countertops meet the definition of a non-porous surface and the floor meets the definition of a porous surface. One wipe sample will be collected on the countertop used to prepare samples for analysis, one bulk sample will be collected on the floor of the laboratory, and one wipe sample will be collected on the countertop near the gas chromatograph used to test samples for PCB's.

Other Areas of the Facility

EVI does not anticipate PCBs being tracked into other areas (e.g., office areas, break room, etc.) or being present on the walls and ceiling of the storage warehouse as the containers storing PCB materials are not opened at the Williston facility except for the purpose of sampling or inspection. EVI will, however, conduct an assessment of these areas as part of the closure process by collecting PCB swipe samples to document that PCBs have not been tracked to these areas and any "positive" results indicating PCB's are present, will then be "bulk sampled" pursuant to Appendix J procedures. In the event that PCBs are identified at concentrations above the unrestricted use concentration for PCB bulk samples, EVI will include those areas in the decontamination process. Swipe samples will be collected from the walls of the warehouse, from the ceiling of the warehouse, and from the floor of the break room. An estimated 8 swipe samples will be collected from these areas of the facility.

Verification Sampling and Analysis

This section describes the procedures for collection of swipe, rinse water, and concrete floor verification sampling and analysis. Sample collection and handling activities will be performed by trained personnel in accordance with the procedures specified in this section. Appendix E summarizes the sampling program for closure of the facility including the sample types, analysis parameters, locations, and estimated number of samples including quality assurance/quality control samples. Laboratory analysis will follow the USEPA SW-846 Methods specified in the closure plan or other comparable USEPA SW-846 Methods adopted by the testing laboratory at the time of closure.

Swipe Sampling and Analysis

The following procedure will be used to verify PCB decontamination procedures conducted on the ceiling, floors, and walls surrounding the container storage area and staging area. Samples will be collected in accordance with established sampling criteria for conducting swipe-sampling events. Swipe sample locations will be determined by implementing an appropriate grid-sampling scheme, per 40 CFR Part 761 Subpart N and by randomly selecting the sample locations. Swipe samples will be collected from the ceiling and walls of the facility, from laboratory non-porous surfaces, in the break room, and as an alternate to 40 CFR 761.79(c), from moveable equipment.

Following the decontamination activities, the first step will be to conduct all PCB wipe sampling. Wipe samples will be taken by applying a suitable solvent (hexane, for example) to a gauze pad.

The gauze pad, pre-moistened at the laboratory, will be rubbed thoroughly over a 100 cm² surface area to obtain the sample. The 100-cm² area will be delineated using the template. Once the gauze has been wiped, the gauze pad is placed into a clean laboratory-provided sample jar. The jar will be capped, labeled, and placed into a cooler to maintain sample integrity. Chain of custody documentation will be initiated and accompany the sample to the laboratory. Wipe samples will be analyzed for PCBs using SW-846 Method 8082.

A dedicated one-time-use template will be used for the collection of each wipe sample. After each use, the template will be discarded. In addition, sampling personnel will wear clean latex gloves during the collection of each sample. Gloves will be changed prior to collection of each sample.

Bulk Sampling

The following procedure will be used to verify PCB decontamination procedures conducted on the concrete flooring of the container storage cells and other waste management areas. Samples will be collected in accordance with established sampling criteria for conducting bulk sampling. Bulk sampling will be the last of the three verification samples to be collected.

After constructing the grid system, concrete samples will be collected. Concrete samples will be collected using a hammer drill with a bit that is nominally 1 inch in diameter. The bit will be drilled into the concrete to a depth of 0.5 inches in accordance with EPA Region I "Draft" Standard Operating Procedure For Sampling Concrete In the Field" (See

Appendix J). The concrete material will be removed with small scoops or a vacuum system at each sample location. Once the samples have been collected in the center of each grid location, they will be composited following procedures specified in 40 CFR 761.289 (compositing samples). Up to a maximum of 9 sub-samples will be collected for each composite sample in accordance 40 CFR 761.283. The composite sample will represent an area that is 2 grid intervals in width and length. An equal volume from each sub-sample will be collected and thoroughly mixed with the other 8 sub-samples for a total of 9 sub-samples. Compositing of samples may be performed in the field. Alternatively, the laboratory selected for analysis may prepare the composite samples for analysis. Once samples are collected, caps will be screwed tightly onto containers. A sample label will be completed using a water-resistant marker. Samples will be transported to the laboratory and stored prior to analysis, if necessary, under refrigeration. Chain-of-custody documentation will be maintained for the samples. Once a composite sample is prepared, the sample will be extracted and analyzed for PCB's.

Quality Assurance/Quality Control Samples

Quality Assurance/Quality Control ("QA/QC") samples will be collected in the same manner as any other sample. The QA/QC samples will be managed, handled, and documented as they would for "actual" samples. For matrix spike/matrix spike duplicates ("MS/MSD"), matrix duplicates, and blanks, samples will be placed in the same type of containers as the samples. Efforts will be made to ensure that MS/MSD, duplicates, and blanks are handled in the same manner as the actual samples.

Blanks

Field Blank - Clean, unused tap water exiting the pressure washing device will be collected in new sample containers with appropriate preservatives, labeled, and submitted as a comparison sample. Tap water will be used as a comparison sample because tap water will be used to clean and rinse the units undergoing closure. Trace constituents that are present in the comparison sample may also be present in the final rinse sample obtained to verify proper decontamination. The presence of constituents in the tap water as generated by the rinsing equipment, not generated by EVI's waste management activities, could falsely indicate that residues remain in the final rinse. Thus, the presence of hazardous constituents in the tap water sample, as determined analytically when compared with the final rinse samples, would indicate that such constituents were not caused by waste management activities, and unneeded repetitions of the cleaning procedures would be avoided. The tap water sample will be analyzed for the same constituents (organic and inorganic), using the same analytical methods specified for rinse water samples in Table 1.

Trip Blank – In addition, deionized water will be placed in appropriate sample containers and transported with other water samples as a trip blank. The deionized water sample will be submitted as a blank for analysis with other water samples. The trip blank will be analyzed for the volatile organic constituents, using the same analytical methods specified for rinse water samples.

Matrix Duplicates – Matrix duplicates will be collected at the rate of 1 in 10 and will be analyzed to check for sampling and analytical reproducibility.

MS/MSD – MS/MSD data provides information regarding the effect of the sample matrix on the digestion and measurement methodology. EVI will collect 1 MS/MSD for every 20 or fewer investigative samples of a given matrix.

SECTION J

**CORRECTIVE ACTION FOR
SOLID WASTE MANAGEMENT UNITS**

At this time, there is no known release of hazardous constituents to the environment at the EVI facility, and in accordance with 40 CFR, Part 264, Subparts F and S, no corrective action, as referenced in Part 11 of this Permit, is necessary at this time.

J. CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS

J-1 Solid Waste Management Units

Solid Waste Management Units ("SWMUs") are located at the ENPRO Services of Vermont, Inc., (EVI) facility. The types of SWMUs present at the facility include the following:

- Container storage areas

J-1 (a) Characterize the Solid Waste Management Unit

Table J-1 provides a description for each SWMU. Information provided for each SWMU on Table J-1 includes the following:

- Description of the unit
- Location of each existing or closed unit on a map
- Location of engineering drawings for each unit in permit application
- Dimensions and materials of construction
- Dates of operation
- Description of wastes placed in each unit
- Quantity or volume of waste, if known

The drawing entitled, "Figure J-1 - EVI – RCRA Units Subject to Permit" provides the location of each existing or former unit at the facility.

J-1 (b) No Solid Waste Management Units

This section is not applicable to this permit application.

J-2 Releases

The Solid Waste Management Units at this facility are the Hazardous Waste Management Units permitted at this facility. There are no other known Solid Waste Management Units or releases from the Solid Waste Management Units at the facility. Determination of releases is based on operator knowledge and daily inspection records for the facility.

J-3 Schedule of Implementation RCRA Facility Investigation

The facility is not subject to the corrective action requirements under RCRA.

Hazardous Waste Facility Permit
ENPRO Services of Vermont, Inc.
EPA ID No. VTR000517052
SUBPART BB AND CC OF 40 CFR PART 264
September 2010

SECTION K

SUBPART BB AND CC OF 40 CFR PART 264

**AIR EMISSION STANDARDS
FOR EQUIPMENT, TANKS, SURFACE IMPOUNDMENTS, AND
CONTAINERS - INSPECTION AND MONITORING PLAN**

1.0 INTRODUCTION/APPLICABILITY

This Inspection and Monitoring Plan specifies the procedures that ENPRO Services of Vermont, Inc., (EVI) follows to maintain compliance with the Air Emission Standards for Equipment, Tanks, Surface Impoundments, and Containers (Subparts BB and CC of 40 CFR Part 264), hereinafter referred to as "Subpart BB and CC." This document summarizes the requirements for labeling equipment, inspection and monitoring, equipment repairs, recordkeeping, and reporting under Subparts BB and CC.

Since EVI is not permitted to treat or store hazardous waste in surface impoundments, and may only store oily waste waters identified by the VT02, VT03, VT08 codes, and compatible non-hazardous waste waters identified by the VT99 code, in the two 1,000 gallon poly tanks., these units are not discussed in this document.

EVI does manage equipment and containers subject to the Subpart BB and CC air emission standards in the container storage areas of the facility. Subpart CC standards are applicable to containers in which hazardous wastes are managed with the following exceptions:

1. Subpart BB air emission standards apply to equipment used to transfer hazardous waste containing greater than 10% organics from containers into transport vehicles, utilizing pumps. These pumps are labeled, identifying this equipment as being utilized for greater than 10% organic based hazardous waste. This equipment, that contains or contacts hazardous waste with an organic concentration of at least 10 percent by weight, is utilized for less than 300 hours per calendar year and is therefore excluded from the requirements of 40 CFR §§264.1052 through 264.1060;
2. Containers in which only hazardous waste with an average volatile organic concentration of less than 500 ppmw is managed;
3. Containers in which only hazardous waste that meets applicable organic hazardous constituent treatment standards under the land disposal restrictions is managed; and
4. Containers with a design capacity of less than or equal to 0.1m³ (approximately 26 gallons).

The provisions of this plan also do not apply to products or virgin materials not regulated as hazardous waste, non-hazardous wastes, or used oils.

2.0 DEFINITIONS

The following definitions as specified in Subpart CC apply to this document:

Average volatile organic concentration or average VO concentration - The mass-weighted average volatile organic concentration of a hazardous waste as determined in accordance with the requirements of 40 CFR 264.1083 of Subpart CC (Waste Determination Procedures).

Closure Device - A cap, hatch, lid, plug, seal, valve, or other type of fitting that blocks an opening in a cover such that when the device is secured in the closed position it prevents or reduces air pollutant emissions to the atmosphere. Closure devices include devices that are detachable from the cover (e.g., a sampling port cap), manually operated (e.g., a hinged access lid or hatch), or automatically operated (e.g., a spring-loaded pressure relief valve).

Container - Any portable device in which a material is stored, transported, disposed of, or otherwise handled.

Cover - A device that provides a continuous barrier over the hazardous waste managed in a unit to prevent or reduce air pollutant emissions to the atmosphere. A cover may have openings (such as access hatches, sampling ports, gauge wells) that are necessary for operation, inspection, maintenance, and repair of the unit on which the cover is used. A cover may be a separate piece of equipment, which can be detached and removed from the unit, or a cover may be formed by structural features permanently integrated into the design of the unit. An example of a cover is a lid on a drum.

In light material service - The container is used to manage a material for which both of the following conditions apply: The vapor pressure of one or more of the organic constituents in the material is greater than 0.3 kilopascals (kPa) (approximately 4.35×10^{-2} psi) at 20°C; and the total concentration of the pure organic constituents having a vapor pressure greater than 0.3 kPa (approximately 4.35×10^{-2} psi) at 20°C is equal to or greater than 20 percent by weight.

No detectable organic emissions - No escape of organics to the atmosphere as determined using the procedure specified in 40 CFR 265.1084(d) of Subpart CC (i.e., by an instrument reading less than 500 parts per million by volume (ppmv) above the background level when measured in accordance with the requirements of Method 21 (Appendix A), and by no visible openings or defects in the device or system such as rips, tears, gaps, etc.).

Point of waste origination - When the facility owner/operator is the generator of the hazardous waste, the point of waste origination means the point where a solid waste produced by a system, process, or waste management unit is determined to be a hazardous waste as defined in 40 CFR Part 261. When the facility owner/operator is not the generator of the hazardous waste, the point of waste origination means the point where the facility accepts delivery or takes possession of the hazardous waste.

Volatile organic concentration, or VO concentration - The fraction by weight of the volatile organic compounds contained in a hazardous waste expressed in terms of parts per million (ppmw) as determined by direct measurement or by knowledge of the waste in accordance with the requirements of 40 CFR 264.1083 of Subpart CC (Waste Determination Procedures). For the purpose of determining the VO concentration of a hazardous waste, organic compounds with a Henry's law constant value of at least 0.1 mole-fraction-in-the-gas-phase/mole-fraction-in-the-liquid-phase (0.1 Y/X) (which can also be expressed as 1.8×10^{-6} atmospheres/gram-mole/m³) at 25 degrees Celsius must be included. Appendix VI of Subpart CC includes a list of compounds known to have a Henry's law constant value less than the cutoff level (i.e., those that are not included in the VO concentration determination).

3.0 CONTAINERS

40 CFR 264.1086 specifies three (3) levels of air emission controls for containers depending on the size of the container, the types of wastes managed, and how the wastes are managed. These control levels and EVI's container management procedures are specified in this section.

3.1 Container Level 1 Standards (see 40 CFR 264.1086(c))

EVI will manage the following types of containers in accordance with Container Level 1 standards:

1. **Containers with a design capacity greater than 0.1 m³ (approximately 26 gallons) and less than or equal to 0.46 m³ (approximately 119 gallons)** - Such containers may include, but not be limited to, 30-, 55-, and 80-gallon drums. Most containers managed by EVI fall into this category.
2. **Containers with a design capacity greater than 0.46 m³ (approximately 119 gallons) that are not "in light material service" (see Section 2.0 - Definitions)** - Containers of this size are called "bulk containers" by USDOT and include, but are not limited to, intermediate bulk containers (tote tanks), tank trucks, railcars, and rolloff boxes. Containers of this size for which a

determination regarding "in light material service" status has not been made will be managed in accordance with Container Level 2 standards (see Section 3.2).

Where applicable, EVI will comply with Container Level 1 standards using one of the following control methods specified by 40 CFR 264.1086(c)(1):

1. The container will meet applicable USDOT hazardous material packaging regulations. This will be EVI's primary method of complying with Container Level 1 standards.
2. Alternatively, the container will be equipped with a cover and closure devices that form a continuous barrier over the container openings such that when the cover and closure devices are secured in the closed position there are no visible holes, gaps, or other open spaces (e.g., a lid on a drum, a suitably secured tarp on a roll-off box, or a bulk cargo container equipped with a screw-type cap). The container, cover, and closure devices will be composed of suitable materials to minimize exposure of the hazardous waste to the atmosphere and to maintain the equipment integrity for as long as the container is in service. Factors to be considered in selecting the materials of construction and designing the cover and closure devices shall include organic vapor permeability and the effects of contact with the hazardous waste or its vapor managed in the container. All containers subject to these air emission standards will be managed inside the EVI facility. Therefore, the effects of outdoor exposure are not applicable.

3.2 Container Level 2 Standards (see 40 CFR 264.1086(d))

EVI will manage the following types of containers in accordance with Container Level 2 standards:

1. **Containers with a design capacity greater than 0.46 m³ (approximately 119 gallons) that are "in light material service"** - Containers of this size are called "bulk containers" by USDOT and include, but are not limited to, intermediate bulk containers (tote tanks), tank trucks, railcars, and rolloff boxes.
2. **Containers with a design capacity greater than 0.46 m³ (approximately 119 gallons) for which a determination has not been made regarding their status as "in light material service."**

Where applicable, EVI will comply with Container Level 2 standards using one of the following control methods specified by 40 CFR 264.1086(d)(1):

1. Containers subject to Container Level 2 standards at EVI will meet applicable USDOT hazardous material packaging regulations, as allowed by 40 CFR 264.1086(d)(1)(i). This will be EVI's primary method of complying with Container Level 2 standards.
2. Alternatively, EVI may choose to use a non-DOT specification packaging and perform organic vapor monitoring in accordance with Method 21 of 40 CFR Part 60, Appendix A, or use a container that has been demonstrated within the preceding 12 months to be vapor-tight by using Method 27 of 40 CFR Part 60, Appendix A. This method of compliance with Container Level 2 standards will only be used in very limited cases where the container is not to be shipped off-site.

3.3 Container Level 3 Standards (see 40 CFR 264.1086(e))

Containers with a design capacity greater than 0.1 m³ (approximately 26 gallons) used for stabilization of hazardous waste are subject to the Container Level 3 standards. Since EVI does not perform stabilization of Subpart CC-regulated hazardous wastes in containers, the Container Level 3 standards are not specified in this document.

3.4 Container Management Procedures

Whenever hazardous waste subject to Subpart CC is in a container, all covers and closure devices for that container will be installed, secured, and maintained in the closed position except in the following situations:

1. A container is empty (see Section 7-203(j) of the Vermont Hazardous Waste Management Regulations).
2. A closure device or cover may be opened to add waste or other material to the container. If the container is filled in one continuous operation, the closure devices must be secured in the closed position and the cover installed promptly upon conclusion of the filling operation. If the container is filled in discrete quantities or batches, the closure devices must be promptly secured in the closed position and the covers installed upon either: the container

being filled to its final fill level; the completion of a batch loading after which no additional material will be added within 15 minutes; the person performing the loading operation leaving the immediate vicinity of the container; or the shutdown of the process generating the material added to the container, whichever occurs first.

3. A closure device or cover may be opened to remove waste from the container. If the waste is removed in discrete quantities or batches, but the container is not RCRA-empty, the closure devices must be secured in the closed position and cover installed promptly upon completion of a batch removal after which no additional material will be removed within 15 minutes, or the person performing the unloading leaves the immediate vicinity of the container, whichever comes first.
4. A closure device or cover may be opened when access inside a container is needed to perform routine activities other than transfer of waste. Following completion of the activity, the closure device must be promptly secured in the closed position and the cover reinstalled.
5. Opening of a spring-loaded pressure-vacuum relief valve, conservation vent, or similar type of pressure relief device which vents to atmosphere during normal operations for the purpose of maintaining the container's internal pressure in accordance with the container's design specifications, such as during loading or diurnal temperature fluctuations (see 40 CFR 264.1086(c)(3)(iv) for details). The device must be designed to operate with no detectable organic emissions when closed.
6. Opening of a safety device to avoid unsafe conditions.

Transfers of hazardous wastes subject to Subpart CC into or out of containers subject to Container Level 2 standards will minimize exposure of the waste to the atmosphere, to the extent practical, considering the physical properties of the waste and good engineering and safety practices applicable to the hazards of the material.

4.0 INSPECTION AND MONITORING SCHEDULE

Containers at EVI that are subject to Subpart CC standards will be inspected and monitored in accordance with the requirements of 40 CFR 264.1088, and the following schedule.

Containers managed under the Container Level 1 standards, or under the Container Level 2 standards meeting applicable USDOT packaging requirements - Perform a visual inspection of these hazardous waste containers, including covers and closure devices. Check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position. ORGANIC VAPOR MONITORING IS NOT REQUIRED FOR CONTAINERS MEETING APPLICABLE USDOT PACKAGING REQUIREMENTS. Perform these visual inspections in accordance with the following schedule:

1. **Initial visual inspection** - at the time the containers are first accepted (i.e., prior to signing the manifest); and for containers generated on-site at the time hazardous waste subject to Subpart CC is added to the container. Refer to Section C, Appendix F of this permit (Level I QA/QC Report).
2. **Annual visual inspection (at least once every 12 months)** - only for containers that remain at the facility for one (1) year or more. Refer to Section F, Appendix A of this permit (Table F-2).

EVI will not manage hazardous waste subject to Subpart CC in containers that do not meet USDOT packaging requirements.

5.0 INSPECTION AND MONITORING PROCEDURES

5.1 Inspection Procedures

EVI will visually inspect containers subject to Subpart CC and their covers and closure devices as follows:

1. View the entire container, its cover and closure devices (e.g., bungs, valves, caps, etc.) for evidence of any defect that could result in air pollutant emissions.
2. Defects include, but are not limited to, visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure

devices are secured in the closed position. In addition, visible vapor or liquid leakage may indicate a leak is present.

3. Note any visible evidence of any defect and immediately report such observations to the Supervisor or Senior Waste Technician for repair in accordance with Section 6.0.

5.2 Monitoring Procedures

Since EVI only manages hazardous waste subject to Subpart CC in DOT specification packaging, monitoring is not conducted.

6.0 REPAIRS

When a defect is detected by either a visual inspection, as described in Section 5.1, or by leak detection monitoring, as described in Section 5.2, repair the container in the following manner:

1. The first attempt at repairing a container will be no later than twenty-four (24) hours after the defect is detected.
2. Repair the container as soon as possible, but no later than five calendar days after detection of the defect.
3. If repair of the defect cannot be completed within five calendar days, then remove the hazardous waste from the container and do not use the container to manage hazardous waste until the defect is repaired.

7.0 RECORDKEEPING

Record and maintain the information described in this section in accordance with 40 CFR 264.1050 (f) and 264.1089. EVI will maintain the records specified in this section in the facility operating record for a minimum of three years. These records include the documentation of the initial visual inspections and annual inspections described in paragraph 4.0, above, and documentation of hours of service per calendar year for pumps (See Section C, Appendix D of this permit).

For containers exempted from Subpart CC because they hold only wastes with an average volatile organic concentration of less than 500 ppmw, or for which volatile organics have been destroyed or removed, EVI will maintain the following records:

1. For wastes with an average volatile organic concentration of less than 500 ppmw, information used for each waste determination in the facility operating record. If analytical results are used, record the date, time and location of each sample.
2. For wastes treated to remove volatile organics, the identification number of the incinerator, boiler, or industrial furnace in which the waste was treated.
3. For wastes that are exempt because they meet applicable organic treatment standards under the land disposal restrictions (LDR) (40 CFR 265.1083(c)(4)), EVI already maintains LDR notifications as required by 40 CFR 268.7. These records are not required by Subpart CC, but can be used to document these determinations.

8.0 REPORTING

In the event that EVI manages hazardous waste containing volatile organics > 500 PPM in containers that do not meet U.S. DOT requirements, EVI will submit a written report to Regional Administrator and Vermont's Waste Management Division Director within 15 calendar days of the time that the facility becomes aware of the occurrence. The written report will contain the EPA identification number, facility name and address, a description of the noncompliance event and the cause, the dates of the noncompliance, and the actions taken to correct the noncompliance and prevent recurrence of the noncompliance. The report will be signed and dated by an authorized representative.

SECTION L
WITHDRAWAL OF SOLID
WASTE APPLICATION



January 12, 2010

Mr. George Desch, Director
Waste Management Division
Vermont Department of Environmental Conservation
103 South Main Street, West Office Building
Waterbury, VT 05671-0404

Dear Mr. Desch:

Pursuant to our recent discussions concerning the role of the Vermont Department of Environmental Conservation (DEC), Solid Waste Management Program's role in permitting waste management activities at ENPRO Services of Vermont, Inc. (EVI) facility located in Williston, Vermont, EVI hereby requests withdrawal of its Solid Waste Certification application submitted on January 16, 2007.

Withdrawal of the application is based on our understanding that EVI may continue to accept and store solid waste at its permitted hazardous waste management facility located in Williston provided all wastes accepted by the facility (i.e., solid and hazardous wastes) are managed in accordance with EVI's hazardous waste storage facility certification, as renewed and modified

If you have any questions, please do not hesitate to contact me. Thank you for your assistance in streamlining this renewal application process.

Sincerely,

ENPRO Services of Vermont, Inc.

David A. Cowie
President

ENPRO Services of Vermont, Inc.

54 Avenue D, Williston, VT 05495
(802) 860-1200 - FAX (802) 860-7202

www.tsdf.com