Qualifications and Audit Package

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VEOLIA
ENVIRONMENTAL SERVICES

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Veolia Environmental Services Company Information

Veolia Environnement

Veolia Environnement operates the environmental services business, with operations in more than 48 countries. Veolia Environnement provides environmental management services, including water treatment and system operation, waste management and recovery, and energy services and power generation to a wide range of public authorities and industrial, commercial and residential customers. Veolia Environnement is the only company to provide total integrated environmental services including:

- Water
- Waste Management
- Energy Services

Key Facts

- # 1 Worldwide in Environmental Services
- Net sales > $38 Billion in 2012
- Water: 41% of Revenue
- Waste: 31% of Revenue
- Energy: 26% of Revenue
- 222,000 employees
- Operations in over 48 countries

Web site: http://www.veolia.com

Veolia Environmental Services Worldwide

Veolia Environmental Services, the waste management division of Veolia Environnement, is the world's second largest waste management company, with over 70,000 employees in 33 countries. The company generated revenues of $12 billion in 2012.

Veolia Environmental Services is the only company that handles all forms of waste, at every step in the waste management process. We manage liquid and solid, non-hazardous and hazardous waste, from collection to disposal and recycling, for both the public and private sectors.

Key Facts

- No. 2 provider of waste services worldwide
- 2012 revenues of $12.6 billion
- 763 Treatment facilities
- Established in 33 countries
- 800,000 customers worldwide;
- 70,000 employees in 33 countries

Web Site: http://www.veolia-proprete.com

Veolia Environmental Services North America

With over $1.8 billion in revenues in 2011, Veolia Environmental Services North America continues to innovate in order to maintain leadership in its ever-expanding business sector. The main components of our strategy are to treat waste and turn it into usable resources, to promote sustainable development through our work, to communicate and participate in public strategy, and to extend our presence around the world. Our services to industrial, commercial and governmental customers include:

- Technical solutions (hazardous waste and regulated waste management)
- Industrial cleaning & maintenance

Key Facts

- # 1 in industrial cleaning services
- # 2 in regulated waste management
- $800 Million in revenue in 2012
- Approximately 120 locations across the United States, Puerto Rico and parts of Canada (British Columbia and Ontario)
- 5,500 employees
- Established in U.S. in 1984

Web Site: www.veoliaes.com

Veolia Environmental Services Service Offering

Veolia Environmental Services North America provides its services primarily to the industrial and commercial sectors from approximately 120 service locations in the U.S., Puerto Rico and parts of Canada. These services are provided through two complimentary business units:

Technical Solutions

Veolia ES Technical Solutions, L.L.C. provides a complete range of services for industrial and municipal customers needing to dispose of hazardous and regulated waste. Capabilities include labor services on customers' sites, permitted and secure incineration, fuels blending, recycling of solvents and acids, lighting and electronic waste recycling, and low-level radioactive and mixed waste solutions.

Key Facts

- Regional and national service offering
- Serving US, Puerto Rico
- 1,600 employees
- Facilities:
  - 2 incineration facilities
  - 15 company operated TSDF's
  - 37 (10) day in transit facilities
  - 4 fuels blending facilities
  - 4 electronics recycling facilities

Industrial Services

For more than 30 years, Veolia ES Industrial Services has been providing industrial cleaning, mechanical and maintenance services and environmental waste management solutions. Veolia ES Industrial Services is the largest provider of industrial cleaning services in North America.

- Regional and national service offering
- 30-plus years specialized industry experience
- 4,500 employees in US and Canada
- Facilities:
  - Over 100 service locations in US and Canada, including site-based operations

Veolia ES Technical Solutions, L.L.C.

Key Facts:

Company Legal Name:	Veolia ES Technical Solutions, L.L.C. Previous names were Onyx Environmental Services, L.L.C.
Parent Offices:	Veolia Environmental Services North America Corp.
	200 East Randolph Drive, Suite 7900 Chicago IL, 60601 www.VeoliaES.com
Headquarters:	Veolia ES Technical Solutions, L.L.C. 700 East Butterfield Road Suite 201 Lombard, IL 60148 T: (630) 218-1500 F: (630) 627-2983
Duns #:	08-218-4156
FEIN#:	36-4287998 (VESNA 36-4394814)
Date of Incorporation:	State of Delaware 03/24/99
Employees:	1600
Officers:	Jim Bell, President & CEO Doug Berg, Treasurer and CFO Rob Wlezien, Vice President Sales & Marketing Bob Cappadona, Vice President Field Operations, Western Region Paul McShane, Vice President Field Operations, Eastern Region Greig Siedor, Vice President Legal Bob Garner, Vice President, Compliance and Quality Michael Loeffel, Vice President, Human Resources
Insurance Brokers:	Marsh, Inc.
Insurance Company:	American International Group
Toll Free Number:	(800) 556-5267
Web site:	http://www.veoliaes.com

Electronics Recycling Timeline

- **Jan. 1983- Founding company incorporated in State of WI**
- **Feb. 1993- Superior Services is formed through the consolidation of 22 companies**
- **Feb. 1993- Superior offers lamp recycling services**
- **Feb. 1994- Superior offers mercury retort services**
- **Dec. 1997- Superior acquires Dynex, Inc. Greendale, WI St. Paul, MN**
- **July 1999- Vivendi Environment Acquires Superior**
- **Oct. 1999- Superior acquires Recyclights, Inc. Bloomington, MN Columbus, OH, Lakeland and Tallahassee, FL**
- **Oct. 1999- Superior acquires P3, Inc. Plant City, FL**
- **Nov. 1999- Superior acquires Quick Silver, Inc., Tampa, FL**
- **April 2000- Superior acquires Global Recycling Technologies, Inc. Stoughton, Massachusetts**
- **May 2000- Superior acquires Salesco Systems USA, Inc. Phoenix, Arizona**
- **Jan. 2003- Superior Special Services changes name to Onyx Special Services, Inc. The Electronics Recycling Division is the largest lamp recycler in the country.**
- **Jan. 2005- The Electronics Recycling Division becomes legally Onyx Environmental Services, L.L.C.**
- **July 2006- Onyx Environmental Services, L.L.C. becomes Veolia ES Technical Solutions, L.L.C.**

Electronics Service Offerings

Veolia Environmental Services (VES) offers solutions for both large and small quantities of lighting and electronic waste. Whether customers participate in our "Bulk" recycling or "RECYCLEPAK®" prepaid recycling program, both are assured environmental compliance, liability protection and timely and responsive service. Our turnkey recycling programs include packaging, transportation, tracking documents, and waste processing, and recycling certificates for customers throughout the United States.

Mercury-Bearing Lamps	
Straight fluorescent	U-tubes
Circular lamps	Compacts
HIDs	VHO power grooves
Shielded/coated	Ultra violets

Mercury Waste	
Thermometers	Thermostats
Relays	Manometers
Ignitron tubes	Flow meters
Rectifiers	Gas pressure regulators

PCB and Non-PCB Lamp Ballast	
Magnetic and Dimmable Fluorescent Ballasts	CFL Ballasts
Pulse Start Metal Halide Ballasts	Mercury Lamp Ballasts
Standard Metal Halide Ballasts	Electronic HID Ballasts
High and Low Pressure Sodium Ballasts	PCB and Non-PCB Ballasts

Batteries	
Alkaline	Nickel metal hydride
Mercury	Zinc carbonaire
Lithium	Nickel cadmium
Carbon zinc	Silver oxide
Magnesium	Lead acid/gel cell

PCB and Non-PCB Electronic Waste	
Transformers	Capacitors
Switches	Debris and oil
Cable	Bushings

Computers and Electronic Equipment	
Cathode ray tubes (CRTs)	PCs, mainframes, peripherals
Telephone systems	Generators
Medical equipment	Wire
Office equipment	Motors

VES also offers a full range of packaging for smaller quantities of lighting and electronic waste. Our RECYCLEPAK® program was designed was designed to handle small quantities of lamps, TSCA-exempt PCB and Non-PCB lamp ballast, dry cell batteries, mercury thermostats and computer CRTs. Contact your customer service or sales representative for additional details or visit www.prepaidrecycling.com for more information.

Corporate Programs and General Operations

Facility/Corporate Compliance Programs

VES maintains support systems, which assure safe and compliant handling of PCBs, hazardous, and toxic waste during all company operations. These activities include implementation of the waste analysis and materials testing plan, waste disposal plan, personnel training plan, inspection plan, occupational health and safety plan, emergency/contingency plan, SPCC plan, and closure plans. The contingency plan is required to assure safeguarding of public health and the environment. The company compliance programs are outlined as follows:

The Facility Compliance Program:

- Facility inspections
- Facility personnel training
- Compliance with licenses, permits and applicable regulatory laws
- Maintenance of records and documents
- Compliance management plans
- Manifests
- Internal records
- Health surveillance
- Facility monitoring

The Corporate Compliance Program:

- Permit procurement
- External facility regulatory auditing
- Internal regulatory auditing, QA/QC of compliance programs
- Regulatory report submission
- Regulatory interpretation, guidance and policies
- Development and implementation of health and safety policies and procedures

The Transportation Compliance Program:

- US DOT driver training
- Maintenance of log books
- Transport operating report submissions, where required
- Fuel tax reporting and permitting
- Transportation permit applications and renewals
- Form use (e.g. manifests)

Services and General Operations

VES PCB, Ballast, Mercury and Lamp Recycling Operations operate from four nationwide locations. Permits, approvals, and specific site information are located in **Appendix A-D.** Service summaries provided are as follows:

VES Location	Permits and Approvals for Processing
Port Washington, WI	Lamps and Mercury Retort
West Bridgewater, MA	PCB Ballast, Lamps and Mercury Retort
Tallahassee, FL	Lamps and Mercury Retort
Phoenix, AZ	PCB Transformers/Equipment, PCB Ballasts, Lamps and Mercury Retort

Each VES location provides:

- Waste analysis and materials testing.
- Federal, state and local regulatory analysis.
- Delivery of empty waste storage containers.
- Loading and transportation of waste storage containers.
- Manifest, bills of lading, and labels where applicable.
- Recycling services as detailed above.
- Disposal of regulated liquid and solid waste to US EPA-approved facilities.
- Resale of metals, glass, plastics and valued material generated from recycling process.
- Tracking documents and Certificates of Recycling, Destruction, and/or Disposal.

Corporate Office:

Veolia ES Technical Solutions, L.L.C.
Electronics Recycling
1275 Mineral Springs Drive,
Port Washington, WI 53074
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Fax: (262) 284-3775

Branch Offices:

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Telephone: (602) 233-2955
Fax: (602) 415-3030

Veolia ES Technical Solutions, L.L.C.
Electronics Recycling
90 Pleasant Street
West Bridgewater, MA 02379
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Fax: (774) 296-6040

Veolia ES Technical Solutions, L.L.C.
Electronics Recycling
342 Marpan Lane,
Tallahassee, FL 32305
Telephone: (866) 877-8299
Fax: (850) 878-3349

Waste Acceptance / Tracking System

System Description

Veolia Environmental Services (VES) facilities and branch offices are equipped with IBM-compatible computers inter-linking sales and customer data tracking software. The software permits VES customer representatives to access and evaluate state and local regulations, survey transport/cost options, track customers' project status and prepare specifications, cost estimates, proposals and quotations. It also assures appropriate and timely response and follow-up in all these matters. VES facilities are also equipped with computers utilizing proprietary software programs to track the handling of a generator's waste from its source to its final disposition. Transportation, waste analysis, process, waste streams, metals and glass recovery and disposal data as well as dates, time, unit counts, weights, volume measurements, etc. are all accumulated by the system and used to produce generator reports.

Initial Waste Evaluation / Acceptance

Specific waste evaluation and acceptance procedures are employed by VES to qualify a generator's waste for acceptance and to ascertain RCRA and TSCA status quantity, weight, aging, chemical, physical and metals yield data necessary to in turn determine:

- Federal and State regulatory status or requirements
- Method of containerization
- Appropriate container labels / placards
- Method of loading / transportation
- Appropriate shipping documents
- Disposal method for glass and metals
- Disposal method for phosphor / mercury
- Cost and subsequent pricing

To complete the evaluation, VES obtains basic information from the generator regarding the material to be recycled. From this information the material will be assigned to the appropriate waste category as defined in the VES Waste Acceptance program. Based on the type of material the generator of the waste may be required to complete and sign a waste stream profile sheet for evaluation prior to the acceptance of the material. Since the majority of materials recycled by VES are manufactured articles, VES typically does not require samples of wastes. However, in some cases where the waste characteristics are not readily quantifiable, a representative sample, material safety data sheet, manufacturer's model number or other manufacturer's data, which will satisfactorily characterize the waste, will be required, at VES's discretion, prior to acceptance by VES. A Customer Service Representative will convey the decision as to acceptance or rejection, special stipulations for acceptance, etc., to the customer by telephone or in writing subsequent to the evaluation.

Pre-Shipment Waste Handling Procedures

Upon receipt of a credit account verification or completion of an alternate agreement as to method of payment, and receipt by VES of a signed quotation, proposal or purchase order, VES will notify the customer of such receipt and the following will occur:

In advance of the desired collection date, the customer will contact VES's logistics group to request pick up of the material or, in the case of delivery by the customer, the may notify the facility in advance of the intended delivery date. Before collection or delivery occurs, the customer will provide the VES with the following information:

- Type and quantity of containers
- Material classification(s)
- Scaled or estimated weight(s) and/or counts
- Date(s) accumulation began
- Labels, placards and markings on containers
- Generator's USEPA ID number
- Generator's state ID number, if applicable
- Transporter ID numbers, dates and times, if the delivery is arranged by the customer.

VES will create a customer file, work specification and a work order number to be assigned to each shipment. The work specification concerning transportation, recycling, processing, disposal and special handling required will be entered into VES's waste tracking systems and distributed to VES's sales, logistics, production, accounting and technical personnel. The appropriate Federal or State manifest, non-hazardous waste manifest or bill–of–lading and container ID and label sets will be completed to the extent possible and either express-mailed to the customer prior to scheduled shipment or sent to accompany the transport vehicle.

Post-Shipment Waste Handling Procedures

Upon arrival of a shipment at a VES facility, the following sequence of events occurs:

1. The truck is directed to the receiving dock where VES logistics and technical personnel compare shipping documents and material description against the material profile sheets, work specifications, and the material actually received.
2. All containers are visually inspected and further screened, if deemed necessary using portable mercury analyzers or other methods deemed appropriate for the waste type. Samples may also be collected and submitted to an off-site laboratory for additional analysis.
3. If the shipment conforms to the material profile and work specifications, the shipping document is signed and the truck unloaded. Copies of the bills-of-lading or manifests are then forwarded to the generator and customer, if they are not the same, within the time frame specified in the regulations. Should VES reject any portion or all of a shipment the shipment will be returned to the generator or another site selected by the generator, on the same truck.
4. Upon off-loading, each container is weighed and placed into the process or into a storage area pending processing. A VES receiving record is executed to record all pertinent information.
5. Dependent on the type of material the shipment will be processed on a batch or per container basis and tracked as appropriate thereafter.

Reporting and Record-Keeping

VES is held to specific record-keeping and reporting requirements dependent upon location by local, state and federal regulations. VES maintains records in accordance with all applicable permits and operating agreements, documenting the receipt of waste, including quantity, source (generator and/or transporter), date and time received, the amount of waste in storage and the types of recovered materials, products and waste from processing which are shipped from VES's facilities. The company will retain in its possession all records, document reports and data related to its operation for at least three years.

Training / Health / Safety

Employee Training Policy

All new company personnel are required to satisfactorily complete occupational safety training prior to assignment to work stations or groups. Such training is conducted by VES personnel and includes major topics such as:

- Specific characteristics of hazardous chemicals and waste with emphasis on mercury.
- The general purpose and scope of community and employee right-to-know laws.
- The intent and scope of RCRA and TSCA.
- Recommended transportation, handling and storage procedures for hazardous chemicals and waste with emphasis on mercury.
- Emergency response procedures and site-specific contingency plans.
- Operation of waste reduction, material recovery and metals refining equipment.
- Identification of unsafe operating conditions and utilization of personal protective equipment.
- Spill control and loss prevention methods.
- OSHA regulations for general employee safety.

Employees working within RCRA permitted storage areas are required to undergo 24 hours of formal training starting at their date of employment or the date of their assignment to that task. If on-the-job training is utilized to accomplish specialized training during this initial period, the employee will neither be permitted nor assigned to work in any unsupervised position until he or she has completed the training outlined above.

Health Surveillance

VES will conduct a complete health surveillance program addressing the four major areas of pre-employment physical examinations, employment physical examinations at hire, annual physical examinations during employment and exit physical examinations at termination of employment. VES contracts for health surveillance services utilizing locally approved medical centers supervised by a national occupational medicine provider.

Facility Inspections

Inspections are conducted by VES personnel on a routine basis and recorded on appropriately designed checklists Exceptions to standard conditions are corrected immediately. Inspection frequencies are based upon maximum deterioration rates and realistic probabilities that any given equipment malfunction or failure will impact human health or the environment. Areas subject to spills such as loading/off-loading; waste reduction, recycling and storage areas are inspected daily. VES's facility inspection plans were developed to address the types of problems associated with both the materials VES handles and the equipment used in their related processes. The general classifications of equipment covered in these plans are as follows:

- Monitoring equipment
- Logistics control equipment
- Recycling processing equipment
- Laboratory equipment
- Spill & decontamination equipment
- Material handling equipment
- Storage bins, conveyors & feed chutes
- Storage & containment systems
- Safety equipment
- Fire protection equipment
- Security equipment
- Structures

Safety Program

A major element of VES's Hazard Reduction Program is the emphasis on personnel safety and the assurance of safe practices. VES provides copies of safety policies and procedures to all employees. Training pertaining to employee safety is generally conducted as outlined previously. Additional safety meetings are conducted periodically and as needed. Personal protective equipment is maintained and provided by VES to all personnel required to use the equipment. Basic equipment includes:

Safety glasses, hearing protection, safety-toe boots, Tyvek disposable coveralls, Nitrile gloves, cut resistant gloves and sleeves and appropriate respiratory protection that may include dust masks, cartridge respirators or supplied air respirators.

Emergency equipment includes:

- ABC dry chemical fire extinguishers located throughout the facilities, including office areas.
- Spill control and clean-up materials maintained within the warehouse areas.
- First aid and basic medical supplies.

Contingency Plan/SPCC Plan

Contingency plans have been prepared for each facility. SPCC plans have been prepared for each facility subject to the SPCC planning requirements. The contingency plan describes the planned, organized and coordinated course of action personnel will follow in the event of a threat of or actual incident of fire, explosion, spill or other release of hazardous material(s) which could threaten human health or the environment. Various sections of the plan address:

- Personnel/tasks
- Emergency response procedures
- Control procedures
- Post-emergency procedures
- Incident reporting
- Emergency equipment

- Evacuation Plan

The plans identify at least two emergency coordinators who are authorized to commit resources necessary to expediently and effectively implement the plans. The following public assistance facilities/agencies have been identified and are an integral part of the emergency plan:

- National Response Center
- EPA
- State Regulatory Agencies
- Local Fire Department
- Local Police Department
- Local Hospital

Fire/evacuation drills are conducted at random times throughout the year. Copies of VES's contingency and SPCC plans can be provided to prospective customers upon request.

Process Descriptions

Lamp Recycling Process:

Although there are variations between the equipment used at each facility all lamp-recycling processes utilize a dry separation process. Each machine is capable of processing 20,000 to 40,000 4-foot lamps per 8-hour shift with an asset recovery rate of approximately 100%. Of total bulb weight, roughly 96% is recovered as glass, 2% as aluminum, less than 2% as phosphor powder and less than 1% as mercury for refining. Routine monitoring of mercury values in all recovered materials, through TCLP and total mercury testing techniques, is standard operating procedure. The system utilizes dry crushing, dry separation and dry filtration operations. Lamps are brought into the recycling area on wrapped pallets, within cardboard boxes or lamp fiber drums. The lamps are brought to the lamp feed staging area where they enter the recycling process. In-feed to the process consists of manually opening the packaged containers and placing the lamps into the feed mechanism. The lamps are conveyed into a chamber where a breaker performs an initial particle size reduction of the lamps. Broken lamp pieces are then crushed to achieve a greater particle size reduction and transferred to a primary separator to separate the larger components (aluminum end caps). The remaining components are then further separated generating three process streams, glass cullet, glass fines, and phosphor powder.

The Vapor Collection System is designed to control mercury vapor and dust emissions from the process. The vapor collection system is comprised of a bag house/cartridge filter equipped with a series of particulate filters, an air compressor for filter back purge, and an activated carbon vessel. The system draws mercury vapor and dust from the process equipment into the bag house. The filter arrangement is designed to trap 99.99% of air-borne particles measuring 0.5 microns or larger. Dust accumulates in containers located underneath the bag house. The air stream leaving the bag house then passes through a sulfur-impregnated carbon vessel to further remove mercury vapors. Each stack is monitored using a real-time mercury vapor-monitoring instrument in accordance with facility's specific operating permit/plan.

Environmental Controls

Environmental controls are required because of the toxicity of mercury. Mercury is a contaminant when introduced into the atmosphere, the soil or groundwater. The following controls are installed to minimize the hazard associated with handling of the lamps during the process: If lamps are broken in shipment, particulates, which may work their way out of shipping containers, are containerized for processing through the lamp recycling equipment. A portable Jerome mercury vapor analyzer is used to monitor mercury vapor concentrations in the air throughout the workplace, on a daily basis. Flow diagrams are available in the facility specific section.

Mercury Recovery Retort Operations

Systems Capacity

System capacity is dependent on the type of material being processed. VES can operate 24 hours a day, seven days per week to meet customer needs. VES's processing capacity is approximately 1000-Cu. Yd per year.

Process Description

All materials received are manually inspected. Preprocessing steps recover valuable non-contaminated recyclables such as glass, metals, and plastics. The remaining contaminated mercury debris is then retorted under vacuum. Retort time, temperature and cycle are dependent upon the composition of material to be retorted. Mercury from the retort operations is collected in a system tank and from this tank, 76-pound or metric ton mercury flasks are filled. Mercury is accumulated and shipped to a mercury supply house for purification and packaged for resale.

Environmental and Safety Controls

The processing room is kept under negative pressure relative to ambient. This is done to prevent the release of mercury vapor to the environment. A Jerome mercury monitoring system is in place to gauge mercury levels in the process room, and the process air scrubbing systems. Operational parameters are monitored. The company recognizes and fully appreciates the high levels of liability exposure associated with virtually every kind of business in today's world. It also recognizes its responsibility to its customers to minimize their ultimate liability, as well as its own. Accordingly, it has taken a number of carefully considered measures to accomplish this:

- In-house liability prevention responsibility is designated to oversee all aspects of liability exposure reduction, to assure well-organized and consistent accident response procedures and to assure a proper level of written record keeping, particularly concerning inspection and testing.
- Sales agreements and other documents are carefully worded so as to minimize liability exposure.
- Pollution Legal Liability insurance coverage is an integral part of the company's liability insurance program.

Waste and Materials Analysis Plan

The Waste and Material Analysis Plan outlines procedures for sampling and analysis of metals, glass and mercury/phosphor components derived solely from processed fluorescent, as well as the mercury retort operations. The plan provides a framework for routine analysis of all process materials and waste streams, beginning with sampling objectives and continuing through QA/QC protocol and final analysis of laboratory data. The plan is available upon request.

Laboratory Analysis

Subcontracted laboratories provide analytical services to the Mercury Retort Operations to perform the following:

- Pre-qualification of customer waste, as needed
- Subsequent fingerprinting of waste shipments to determine conformity, as needed
- Post-analysis of process waste materials to determine mercury content
- Post-analysis of recovered materials to determine mercury content
- Metal alloy identification impurity
- Identification of non-conforming waste materials

When required, pre-qualification analysis (TCLP) usually is completed within 3 weeks of receipt of sample, profile sheet and other necessary paperwork. All analyses are subcontracted to state-certified laboratories.

Ballast Processing Operations

Types of Ballast Waste and Containers Accepted

VES will accept ballast in appropriate UN specification drums or boxes. Upon arrival at the facility, all containers are inspected. Any container that is leaking or damaged will be immediately re-containerized or over packed.

Waste Storage

PCB ballasts scheduled for either processing or disposal are stored in secondary containment. Each containment area is designed to accommodate drummed and palletized waste and has an internal containment capacity of greater than 25% of the total capacity of the storage area. Placement of containers within the containment systems is done in such a way as to facilitate inspection and to provide access for emergency equipment in case a container is found to be leaking. All aisles are designed to accommodate, without difficulty, the movement of fire fighting, spill control and decontamination equipment and personnel.

Ballast Recycling System Capacity

VES's total processing capacity is 5,700 ballasts per day or 28,500 ballasts per week. The maximum feed rate is 350 ballasts per hour, regardless of the types or grouping of the ballast. The specific equipment currently in use limits the capacity.

As market demand increases, additional capacity will be provided by installation of more equipment to expand capacity of both the PCB waste reduction process and metals recovery lines.

Ballast Recycling Process Description

In-feed to the process consists of whole lamp ballast in drums. Before any processing operations occur the ballast are placed into a freezer. The temperature achieved in the freezing operation causes the potting compound inside the ballast to become brittle, aiding in the separation of the potting compound from the remainder of the ballast. Non-leaking ballast are supplied to a primary operator who shears the ends off the ballast. The base of the ballast is then manually separated from the cover and the contents ballast removed. The contents consist of three main components, the capacitor, the transformer section, and the potting compound. The potting compound and the capacitors are containerized for shipment to an off-site TSCA approved facility.

The transformer sections and metal casings proceed to a process area where additional potting compound is manually removed. The additional potting compound is combined with potting compound previously removed from ballast. Ballast casings are then decontaminated using a physical removal process. The decontaminated casings are next tested to ensure the effectiveness of the decontamination procedure. After analytical results have been received documenting that the casings have been sufficiently decontaminated, the casings are sold as scrap metal. The transformer sections are separated into two categories of material, wire windings and transformer cores. The wire windings are either manually or chemically decontaminated, depending on the facility. The decontaminated wires are also tested to ensure the effectiveness of the decontamination procedure. After analytical results have been received documenting the wires have been sufficiently decontaminated, the wire is sold as a scrap metal.

Ballast Waste Disposal

The processes involved in the recycling of lamp ballast generate a number of residual waste streams. Each waste stream is characterized based upon the chemical and physical composition of the waste and the process generating the waste. All wastes derived from the processing of PCB containing lamp ballast are managed as TSCA regulated wastes.

Metals

VES produces three grades of non-ferrous secondary "scrap" metals. These are prepared and packaged for sale in accordance with specifications developed by the Institute of Scrap Recycling Industries (ISRI).

Laboratory Analysis

VES contracts with outside laboratories, which typically perform analysis, such as:

- Profiling of various types and groups of lamp ballast

- Subsequent screening to determine conformity
- Identification of non-conforming materials and wastes
- Drum residues
- Contamination of equipment, fixtures, building, floor, etc.
- Waste stream characterization
- Metal alloy identification, purity and PCB contamination

In conjunction with contracted laboratories, VES maintains a strict quality control program to ensure sample integrity. The program objective integrates laboratory-related tasks such as source selection, sampling, sample preservation, analysis and testing, and all data generated there from, to be accurate and precise as well as representative of project goals. The program mandates and ensures defensible evidence of, proper documentation of unbroken custody, trace ability and adherence to applicable protocols.

PCB Transformer/Equipment Recycling Operations

Overview

Since December 15, 1994 our PCB Commercial Storage and Recycling Facility has been operating in Phoenix, Arizona under formal approval issued by the USEPA, Region IX. Under the terms of the Commercial Storage approval, Veolia Environmental Services (VES) is authorized to accept and store for disposal PCB items, including transformers, bushings, capacitors, ballast, miscellaneous articles, debris, liquids, and PCB mixtures. Under the terms of the Alternate Disposal Technology Approval (ADTA), and the EPA PCB Disposal Amendments Final Rule (PCB Mega-rule) issued August 28, 1998, VES is authorized to recycle PCB contaminated equipment.

Waste Storage and Process Area

All of the equipment areas and processing locations incorporate continuous welded steel spill-containment floors, curbs, splash guards and other trade fixtures to isolate and prevent PCB contaminated materials escaping the processing room and equipment areas.

Waste Acceptance Parameters

VES has established waste analysis and materials testing procedures used to qualify a generator's PCB waste for acceptance and to ascertain quantity, weight, aging, chemical, physical and metals yield data necessary to determine:

- State regulatory requirements
- Method of containerization
- Appropriate container labels
- Method of loading/transportation
- Appropriate shipping documents
- Disposal method of non-recyclables
- Disposal method of oil/PPE
- Cost and subsequent pricing

Laboratory analytical verification and material profiles are required for all PCB equipment >50ppm. Additionally, VES may require MSDS sheets and/or manufacturer brochures prior to waste acceptance. Once approved, material profile sheets must be approved by one of the following VES staff prior to shipment to a VES facility:

- Corporate Waste Approvals Manager, or
- Environmental, Safety, and Health Manager

Process Overview

PCB Transformers/Equipment is received in the Phoenix location's loading dock 2 or 3 and placed in containment for inspection. Hazardous waste manifests/shipping papers are inspected and compared to material profiles to ensure waste acceptance compliance. PCB verification forms are reviewed to affirm PCB concentration. Material shipped to the facility without analytical paperwork will be placed on hold and subsequently tested for PCB concentration at an additional cost to the generator. Once material is approved for receipt, it is then assigned a unique container number with VES' computerized waste tracking system.

PCB & Non PCB Electrical Equipment

At VES, PCB containing electrical equipment is systematically drained, flushed, and mechanically disassembled with environmental integrity and maximum metal recovery being the goal. PCB containing materials including oils, debris, and rinsate are separated in secondary containment for ultimate disposal at a TSCA incinerator or landfill. De-contaminated aluminum, iron, steel, and copper-based metals are packaged and shipped for further reclamation. The VES reclamation process recovers more than 90% of most equipment to be recycled, thereby reducing total disposal costs.

While not regulated by TSCA, Non-PCB equipment may fall under state and local laws that affect the disposal of oil-bearing items because of their oil content. Oil containing Non-PCB equipment is regulated under 40 CFR 279, which details the used oil management standards that are in place at the Federal level. At the same time, many States also have their own individual programs regarding the disposal of oil bearing items and may only authorize disposal at specific approved facilities. The Toxic

Substance Control Act (TSCA) regulates the storage and disposal of PCB (Polychlorinated biphenyls), used extensively before 1978 as additives to dielectric and cooling oils. PCB's traditionally were used in electrical applications and are found in most electrical equipment including:

Transformers	Circuit breakers	Reclosers
Capacitors	Electromagnets	Switches
Voltage regulators	Cable	Bushings

Testing of electrical equipment to determine the PCB content of either the dielectric fluid or the mineral oil is not always practical and, in the case of capacitors, may not always be possible. If the equipment is labeled *"Non-PCB"*, then it has no PCB's. If the equipment is either unmarked or poorly marked, the generator should assume PCB content >500 PPM and dispose of in accordance with TSCA guidelines. Accordingly, disposal of Non-PCB electrical equipment needs to be managed with environmental concerns in the forefront. The VES environmental background and technological expertise in electrical equipment recovery provides the safety and controls necessary for the recycling and disposal of Non-PCB equipment. VES PCB and Non-PCB recycling services operates out of our 24,000 square foot production facility in Phoenix, Arizona.

TSCA FACILITY:

Veolia ES Technical Solutions, L.L.C.
Electronics Recycling
5736 West Jefferson Street
Phoenix, AZ 85043
EPA ID # AZ0000337360
Phone # 800 368-9095

Guidelines for Shipping Mercury Waste

Packaging Requirements

All mercury waste and mercury devices are required to be packaged in accordance with the DOT packing Group III performance standards using UN approved packaging or be packaged in non-specification reusable metal packaging. Mercury containing wastes, such as contaminated solids or solutions, must be described using the appropriate DOT shipping name and packaged in containers authorized for that particular shipping name.

The outsides of all containers must be clean and free of debris. Veolia Environmental Services (VES) will provide appropriate DOT labels to be applied to the package prior to shipment or pickup. Please note that the improper containerization, lack of reasonable and safe access to the waste containers, or absence of customer personnel to sign shipping documents at the pickup site may result in delay charges such as standard cancellation/rerouting or standby charges. Containers requiring over-packing due to non-conformance with DOT requirements are subject to additional fees. Contaminated packing material requiring reclamation and/or disposal will be charged at the prevailing rate.

Labeling Requirements: Manifest Descriptions

Below is a list of commonly used DOT Proper Shipping Names with the hazard class, UN/NA ID#, Packing Group, and additional descriptions as they would appear on a shipping paper. This list is not an all-inclusive list and there may be another more appropriate shipping name for the material that you will be shipping.

Waste Name	Type of Shipping Paper	Proper Shipping Name	Hazard Class	UN/NA ID#	Packing Group
Liquid Mercury	Bill of Lading	RQ Mercury	8	UN2809	III
	Haz. Waste Manifest	RQ Waste Mercury	8	UN2809	III
Intact Mercury Devices	Bill of Lading	RQ Mercury contained in manufactured articles	8	UN2809	III
	Haz. Waste Manifest	RQ Waste Mercury contained in manufactured articles	8	UN2809	III
Mercury Debris and Other Solids	Bill of Lading	RQ Environmentally Hazardous substance solid, n.o.s. (Mercury)	9	UN3077	III
	Haz. Waste Manifest	RQ Hazardous Waste solid, n.o.s. (D009)	9	NA3077	III

Profiling and Scheduling Requirements

Before VES will transport, receive, or accept a load, the following documents must be completed, signed, and returned:

- Generator's Material Profile Sheet
- Approved Credit Application

All mercury waste must be properly profiled and accepted prior to any shipment to VES. Waste streams must be fully and accurately described on the profile sheet.

All mercury compound and solution lab-pack profiles must include an inventory list. For mercury solutions, the percentage of mercury in the solution is required. All waste streams containing soil, activated carbon or organic debris must be analyzed for total volatile organic compounds (Method 8260) and total semi-volatile organic compounds (Method 8270).

All shipments must be properly manifested with containers and manifest line items clearly identifiable. A surcharge may apply when the manifest and/or the actual mercury waste shipped does not match the material profile. Mercury waste products which do not match the material profile, but which can be accepted and reclaimed, may be charged an additional fee consistent with the price of the additional handling and processing required. Non conforming waste that cannot be processed by Veolia Environmental Services (VES) may be returned to the generator or redirected to an alternate disposal facility with the generator's approval.

When shipping any mercury waste as a D009 RCRA hazardous waste, a Land Disposal Notification Form is required to be signed by the generator and accompany the manifest with each shipment to VES.

If the customer is to provide transportation, please provide the following information by phone or fax 72 hours in advance of the delivery date:

- Company Name
- Profile Number / Material Shipped
- Quantity of Containers
- Your Company Contact Person and Phone Number

When VES is to provide transportation from the generator's site to a VES facility, please place your pick-up request at least 10 working days in advance with our Customer Service Department. Notify VES of any special handling or loading requirements such as the need for forklift, pallet jack, or special dock restrictions. VES will handle the manifesting of material and provide land ban documents and proper shipping labels.

Insurance and Liability Protection

Veolia Environmental Services North America Corp.

A Summary of the Casualty Insurance Protections for the Corporation, its Subsidiaries, and Customers

A company's philosophy relating to managing those unforeseen risks potentially possible in an operation such as this can be quite indicative of the caliber and capabilities of that firm. That is certainly the case with Veolia Environmental Services North America Corp. (VESNA). VESNA has been diligent in understanding the risks involved and properly addressing them in the form of risk management and insurance by educating and training their internal staffs, partnering with experienced brokers in the environmental insurance arena, and selecting insurers who are both financially sound and offer comprehensive protection programs.

The current program in place has been designed in conjunction with VESNA by Marsh, Inc., the world's largest insurance broker and a leader in environmental insurance. Environmental coverage is placed with American International Group (AIG), the largest insurer in the United States and the largest underwriters of environmental risks; Discover RE, Starr Tech, and Zurich are a few of the other carriers that participate in our insurance program.

Workers Compensation/Employers Liability

The WC/EL policy provides coverage that conforms to the statutory requirements for each state in which employees of VESNA perform operations. The policy is further endorsed to provide coverage for the United States Longshoremen and Harbor-workers Act and for Maritime Employers Liability including Transportation, Wages, and Cure.

Commercial Motor Vehicle Liability

Providing limits of a $1,000,000 combined single limit, this policy protects VESNA for claims from third party for bodily injury and property damage arising out the use of any owned, non-owned, or hired motor vehicle. Where hazardous waste requirements are present, the policy has been endorsed to address such areas with the MCS 90 endorsement mandated by the Motor Carrier Act of 1980 and protects us from pollution liability resulting from the use of motor vehicles.

Commercial General Liability (CGL)

The CGL policy provides occurrence based coverage for bodily injury, property damage and personal injury of third parties arising from the negligence of VESNA's facilities, premises, operations, and products. A primary limit of liability of $5,000,000 per occurrence/$5,000,000 aggregate is provided. It is further supplemented by Excess Environmental Umbrella coverage, which will be addressed later.

Pollution Legal Liability

Pollution Legal Liability (PLL) insurance is an essential asset management tool for businesses that have environmental exposures. Whether hazardous or not, sudden or gradual, practically any substance can cause pollution, given the right circumstances. It includes coverage for third party claims of off-site bodily injury and property damage including legal defense costs and the cost of cleaning up the off-site contamination. A limit of liability of $15,000,000 per occurrence and in aggregate is provided and includes coverage for such exposures to on-site third party bodily injury, and pollution related transportation risk exposures. This policy satisfies the financial responsibility requirement under the Resource Conservation and Recovery Act (RCRA).

Contractors Operations & Professional Services (COPS)

The COPS program meets the needs of the "hands-on" operations and professional services contracting arm of VESNA. It insures against pollution claims that may arise from working at others' sites or claims that may arise out of acts, errors or omissions in rendering professional services. Limits of coverage are $5,000,000 each occurrence/total all claims.

Environmental Umbrella Liability (Excess Liability)

This policy substantially extends the limits of the primary General Liability, Motor Vehicle Liability, and Employers Liability. This coverage also supplements the Pollution Legal Liability for claims that are sudden and accidental and are discovered and reported within policy parameters. Coverage is designed for environmental risks and specific limits of insurance coverage will be addressed on an as needed basis or may be noted on a certificate of insurance.

Property Coverage

Our property program provides a protective risk property insurance program. The program contains boiler and machinery, business interruption, and earthquake/flood coverage's.

We have dedicated significant resources to the proper implementation and administration of a high quality insurance program. Where applicable and within the parameters of the insurance contracts, coverage can be extended to VESNA customers as may be required by various contracts. VESNA has established a record of providing exemplary insurance coverage and risk management practices, which offer the prospect of stable and long-term relationships with their clients and customers.

A sample certificate is provided in the facility specific section.

Facility Information

Veolia Environmental Services - Phoenix, AZ

Facility Contact:	James Harrison
Facility Phone:	602-233-2955 or 800-368-9095
Facility Fax:	602-415-3030
Location:	5736 West Jefferson Street
City:	Phoenix
Country:	USA
State:	AZ
Zip Code:	85043
USEPA ID#:	AZ0000337360
State Regulatory Agency:	http://www.adeq.state.az.us

Facility Permit Summary:

Part B Permit or Solid Waste Permit Number, Date of Issuance, and Expiration Date	Air Permit Number, Date of Issuance, and Expiration Date	NPDES Permit Number, Date of Issuance, and Expiration Date	Wastewater Discharge Permit Number, Date of Issuance, and Expiration Date	TSCA Permit Number, Date of Issuance, and Expiration Date
ADEQ RCRA Part B Permit Submitted 12/12/16	**Air Quality Permit from Maricopa County, AZ #000139 Expires: 3/31/16**	**NPDES Permit AZMSG-12840 Under Renewal**	**City of Phoenix 0306-10963-ZCD 12/31/2013**	**TSCA Permit AZD983473539 Issued: 12/15/94 Expires: 12/31/99 Under renewal** **Alternate Disposal Technology issued by EPA Region IX 12/15/98 (40 CFR 761.60 (e) Under Renewal**

Facility Description:

The Veolia Environmental Services (VES) facility is located in Phoenix, Arizona and is a strategically focused recovery and waste management facility which provides a variety of waste reduction and recycling services. VES Arizona operates a 96,000 square foot plant used to store, process and handle a variety of PCB and Non-PCB equipment and Mercury bearing waste. VES Arizona's waste reduction and recycling facility is fully permitted in accordance with all applicable USEPA and ADEQ regulations governing the handling and disposal of PCB and Mercury Waste.

The following are examples of facility capabilities and operations:

- Lamp and Ballast Recycling Operations
- Battery Recycling Operation
- Computer CPU's and CRT's Management
- Mercury Extracting and Recycling Operation
- PCB and Non-PCB Electrical Equipment Management

Veolia Environmental Services - Port Washington, WI

Facility Contact:	Kevin Shaver
Facility Phone:	262-284-6855
Facility Fax:	262-284-3775
Location:	1275 Mineral Springs Drive
City:	Port Washington
Country:	USA
State:	WI
Zip Code:	53074
USEPA ID#:	WID988566543
Regulatory Agency:	http://www.dnr.state.wi.us/

Facility Permit Summary:

Part B Permit or Solid Waste Permit Number, Date of Issuance, and Expiration Date	Air Permit Number, Date of Issuance, and Expiration Date	NPDES Permit Number, Date of Issuance, and Expiration Date	Wastewater Discharge Permit Number, Date of Issuance, and Expiration Date	TSCA Permit Number, Date of Issuance, and Expiration Date
RCRA Permit: WID988566543 Issued:10/1/99 Under renewal WDNR License #6008 Issued 10/1/12 Expires: 9/30/13 SW License: 03870 Issued 10/1/12 Expires 9/30/13	**Air Permit #01-DJH-339 Issued:3/01/05 Expires: 2/28/10 Under renewal (08/31/09 Submittal)**	**NA**	**NA**	**Meets Exemption Criteria**

Facility Description:

The site consists of 11.45 acres. A security fence surrounds the active four acre portion of the site. There is only one gate to the facility, which is locked during off-hours. Previous use of the property was agricultural (fields). The property is located within a light industrial park. The nearest residential area is within one quarter mile. The population within a one-mile radius is approximately 500. The nearby city of Port Washington has an estimated population of 10,000. Schools and parks are more than one mile away from the facility. The nearest hospital is more than ten miles away. The facility storage building opened on December 27, 1989 and is located along the northwest end of the active portion of the site inside the security fence. The facility storage building is 82'x120' or 9,840 square feet. There are no underground or above ground storage tanks on site. The facility is exempt from regulation under certain portions of Chapter NR 600 Wis. Admin. Code because it meets the definition of "legitimate recovery" operations under NR 625.06 Wis. Admin. Code. PCB accumulation is exempt from commercial PCB storage requirements under section 144.44 (9) Wis. Stats. There are no industrial wastewater discharges from the facility.

The Port Washington facility can handle the following types of waste: Mercury bearing lamps, mercury devices, mercury compounds, mercury debris, mercury soil, mercury contaminated phosphor, lamp ballast, small PCB capacitors (<9lbs), all types of batteries, computers and electronics.

The Port Washington facility has developed and maintains an Environmental Management System (EMS) in accordance with ISO 14001-2004 requirements. The facility also has developed and maintains an Occupational Health and Safety Management System (OHMS) in accordance with the requirements of OHSAS 18001-2007. Both the EMS and OHMS are component parts of the facility's Responsible Recycling: 2008 (R2) Practice for electronic recyclers. The R2 Program has achieved registration certification issued by SGS US Testing Company, Inc., as accredited by the American National Standards Institute-American Society of Quality National Accreditation Board (ANAB).

Veolia Environmental Services - Port Washington, WI (Park Street)

Facility Contact:	Kevin Shaver
Facility Phone:	262-284-6855
Facility Fax:	262-284-3775
Location:	215 South Park Street
City:	Port Washington
Country:	USA
State:	WI
Zip Code:	53074
USEPA ID#:	WIR000130591
Regulatory Agency:	http://www.dnr.state.wi.us/

Facility Permit Summary:

RCRA or Solid Waste Permit Number, Date of Issuance, and Expiration Date	Air Permit Number, Date of Issuance, and Expiration Date	NPDES Permit Number, Date of Issuance, and Expiration Date	Wastewater Discharge Permit Number, Date of Issuance, and Expiration Date	TSCA Permit Number, Date of Issuance, and Expiration Date
Universal Waste – Large Quantity Handler: **WIR000130591** **Issued: 11/21/07** **Hazardous Waste – Small Quantity Generator:** **WIR000130591** **Effective: 03/01/10** **WDNR Registration Refrigerant Recovery from Salvaged or Dismantled Refrigeration Equipment (Type 2)** **Issued 10/01/12** **Expires: 09/30/13**	**NA**	**NA**	**NA**	**NA**

Facility Description:

The site consists of approximately 20,000 square feet in leased warehouse building. The building is owned by Park Street Industrial, LLC. The building is part of an old industrial complex being revitalized and redeveloped for lease. A security fence isolates the leased portion of the warehouse space. The warehouse building is also surrounded by a security fence, which is locked during off-hours. Previous use of the property was manufacturing. The property is located within a light industrial park. The nearest residential area is within two-tenths of a mile. The population within a one-mile radius is approximately 6000. The city of Port Washington has an estimated population of 12,000. An elementary school is located approximately 0.5 miles to the west of the facility. The nearest hospital is more than ten miles away. There are no industrial wastewater discharges from the operations.

The Part Street Port Washington facility handles the following types of waste: all types of batteries, computers and electronics, and refrigerant containing equipment.

The Port Washington facility has developed and maintains an Environmental Management System (EMS) in accordance with ISO 14001-2004 requirements. The facility also has developed and maintains an Occupational Health and Safety Management System (OHMS) in accordance with the requirements of OHSAS 18001-2007. Both the EMS and OHMS are component parts of the facility's Responsible Recycling: 2008 (R2) Practice for electronic recyclers. The R2 Program has achieved registration certification issued by SGS US Testing Company, Inc., as accredited by the American National Standards Institute-American Society of Quality National Accreditation Board (ANAB).

Veolia Environmental Services – West Bridgewater, MA

Facility Contact: Paul Conca
Facility Phone: 774-296-6030
Facility Fax: 774-296-6040
Location: 90 Pleasant Street
City: West Bridgewater
Country: USA
State: MA
Zip Code: 02379
USEPA ID#: MAC300017498
State Regulatory Agency: http://www.state.ma.us/dep/

Facility Permit Summary:

Part B Permit or Solid Waste Permit Number, Date of Issuance, and Expiration Date	Air Permit Number, Date of Issuance, and Expiration Date	NPDES Permit Number, Date of Issuance, and Expiration Date	Wastewater Discharge Permit Number, Date of Issuance, and Expiration Date	TSCA Permit Number, Date of Issuance, and Expiration Date
Class C Recycling Permit 1RC/2013 Issued 3/28/13 Expires 3/28/18	**NA**	**NA**	**NA**	**TSCA Permit MAC300017498 Issued: 4/17/13 Expires: 4/17/23**

Facility Description:

The Veolia Environmental Services' (VES) facility in West Bridgewater, Massachusetts is a recycler of a variety of lighting and electronic wastes. VES utilizes state of the art recycling technologies to recover and re-use a wide variety of valuable materials. The West Bridgewater facility performs 100% recycling of fluorescent and HID lamps. VES de-manufactures these mercury-containing lamps, reclaiming the glass, metal, powder and mercury. The four lamp components are sold as product from the West Bridgewater facility. VES also reclaims mercury from other devices such as thermometers, thermostats, barometers, etc. VES operates its lamp recycling and mercury reclamation processes under a "Class C" Commercial Recycling Permit issued by the Massachusetts Department of Environmental Protection (MADEP). VES operates its PCB ballast recycling operations under a PCB Commercial Storage Permit and an Alternative Decontamination and Sampling Plan (40 CFR 761.79(h)) approved by USEPA.

VES de-manufactures PCB and DEHP ballasts in a controlled environment, producing clean components of metal casing and copper, which are sold for recycling. VES ships capacitors and potting compound removed from PCB lamp ballasts to an USEPA-approved incinerator or secure chemical landfill, depending upon customer requirements. VES recycles DEHP capacitors in accordance with all applicable state and federal regulations. VES is authorized by the Massachusetts Department of Environmental Protection to receive all types of batteries as a universal waste. After receiving, batteries are identified, sorted, or re-packaged for shipment to off-site reclamation facilities. Types of batteries, which are recycled include Alkaline, Mercury, Carbon Zinc, Nickel Cadmium and Lead Acid/Gel Cell.

VES also receives cathode ray tubes (CRTs) and computer equipment for recycling.

Transfer Facility:
1453 Pinewood Street
Rahway, NJ 07065
Large Quantity Universal Waste Handler
EPA ID# NJR000042572

Veolia Environmental Services - Tallahassee, FL

Facility Contact:	Linda Dunwoody
Facility Phone:	850-877-8299
Facility Fax:	850-878-3349
Location:	342 Marpan Lane
City:	Tallahassee
Country:	USA
State:	FL
Zip Code:	32305
USEPA ID#:	FLO000207449
State Regulatory Agency:	http://www.dep.state.fl.us

Facility Permit Summary:

Part B Permit or Solid Waste Permit Number, Date of Issuance, and Expiration Date	Air Permit Number, Date of Issuance, and Expiration Date	NPDES Permit Number, Date of Issuance, and Expiration Date	Wastewater Discharge Permit Number, Date of Issuance, and Expiration Date	TSCA Permit Number, Date of Issuance, and Expiration Date
Permit Number 71455-HO-009 Issued 9/19/07 Expires 9/26/11 Under Renewal	**0730094-007-AG Issued: 5/15/08 Expires 5/15/13**	**FLR05F873 Expires: 6/05/2014**	**NA**	**NA**

Facility Description:

Veolia Environmental Services' (VES) Tallahassee facility is located in the northwest corner of a 27-acre industrial park. The building has 10,000 square feet processing and office space. The building is used to receive and process lamps for distillation/recycling. There are separate rooms for lamp disassembly and distillation. These rooms are maintained under negative pressure. South of the main building is an additional 2500 square feet dedicated to computer electronics.

VES has the ability to recycle fluorescent and High Intensity Discharge (HID) lamps using a sophisticated and proven technology with a 17-year operating history. VES has the ability to provide complete on-site distillation, which eliminates both the need for hazardous waste storage, and the shipment of hazardous waste from the facility. The facility is able to extract over 99% of the mercury from a lamp, and the recovered mercury is also over 99% pure.

Facility Permits and Licenses

Facility Name Address Telephone Site Contact	Part B Permit or Solid Waste Permit Number, Date of Issuance, and Expiration Date	Air Permit Number, Date of Issuance, and Expiration Date	NPDES Permit Number, Date of Issuance, and Expiration Date	Wastewater Discharge Permit Number, Date of Issuance, and Expiration Date	TSCA Permit Number, Date of Issuance, and Expiration Date	EPA Id Number
Veolia ES Technical Solutions, L.L.C. 5752 West Jefferson Street Phoenix, Arizona 85043 Contact: James Harrison 602-233-2955 or 800-368-9095	ADEQ RCRA Part B Permit Submitted 12/12/16	Air Quality Permit from Maricopa County, AZ #000139 Expires: 3/31/16 Under Renewal	NPDES Permit AZMSG-12840 1/3/10 Under renewal	City of Phoenix 0306-10963-ZCD 12/31/2013	TSCA Permit AZD983473539 Issued: 12/15/94 Expires: 12/31/99 Under renewal Alternate Disposal Technology issued by EPA Region IX 12/15/98 (40 CFR 761.60 (e) Under Renewal	AZ0000337360
Veolia ES Technical Solutions, L.L.C. 1275 Mineral Springs Drive Port Washington, WI 53074 Contact: Kevin Shaver 262-284-6855	RCRA Permit: WID988566543 Issued:10/1/99 Under renewal WDNR License #6008 Issued 10/1/12 Expires: 9/30/13 SW License: 03870 Issued 10/1/12 Expires 9/30/13	Air Permit #01-DJH-339 Issued:3/01/05 Expires: 2/28/10 Under renewal (08/31/09 Submittal)	NA	NA	Meets Exemption Criteria	WID988566543
Veolia ES Technical Solutions, L.L.C. 215 South Park Street 53074 Contact: Kevin Shaver 262-284-6855	Universal Waste – Large Quantity Handler: WIR000130591 Issued: 11/21/07 Hazardous Waste – Small Quantity Generator: WIR000130591 Effective: 03/01/10 WDNR Registration Refrigerant Recovery from Salvaged or Dismantled Refrigeration Equipment (Type 2) Issued 09/03/12 Expires: 09/30/13	NA	NA	NA	NA	WIR000130591
Veolia ES Technical Solutions, L.L.C. 90 Pleasant Street West Bridgewater, MA 02379 Contact: Paul Conca 774-296-6030	Class C Recycling Permit 1RC/2013 Issued 3/28/13 Expires 3/28/18	NA	NA	NA	TSCA Permit MAC00017498 Issued: 4/17/13 Expires: 4/17/23	MAC300017498
Veolia ES Technical Solutions, L.L.C. 342 Marpan Lane Tallahassee, FL 32305 Contact: Linda Dunwoody 850-877-8299	Permit Number 71455-HO-009 Issued 9/19/07 Expires 9/26/11 Under renewal	0730094-007-AG Issued: 5/15/08 Expires 5/15/13	FLR05F873 Expires: 6/05/2014	NA	NA	FL0000207449

Transportation Permits

Jurisdiction	Permit Name	Number
Alabama	Hazardous Waste	NJD080631369
Arkansas	DOT	H-986
Arkansas	DEP	PC-1562
Arizona		NJD080631369
Boston	Fire Department	7026
Broward County	Hazardous Materials	HMT –01-16993
California	Hazardous Materials	CA - 76443
California	Hazardous Waste	3424
California	Motor Carrier Authority	0076443
Colorado	Hazardous Materials	HMP-02581
Connecticut	Hazardous Waste	CT-HW-663
Connecticut	Biomedical Waste	CT-BMW-012
Dade County, FL	Liquid Waste Hauler	LW-HW2000-0001-000
Delaware	Solid Waste Transporter	DE-SW-463
Delaware	Hazardous Waste	DE-HW-463
Florida	Hazardous Waste	NJD-080631369
Florida	Mercury Containing Lamps & Devices	NJD080631369
Florida	Used Oil Transporter	NJD080631369
Georgia	Hazardous Materials	10444-10451
ICC	Motor Carrier Authority	MC295758
Idaho	Hazardous Waste	1001043
Idaho	Hazardous Material	1001043
IFTA	Fuel Tax – Illinois base	IL36428799801
Illinois		
Illinois ICC	Single State Registration	112609
Indiana		NJD080631369
Iowa		NJD080631369
Kansas	Hazardous Waste	NJD080631369
Kentucky		NJD080631369
Louisiana		NJD080361369
Maine	Hazardous Waste	ME-HWT 400 ME-WOT-425
Maryland	Hazardous Waste	HWH599
Massachusetts	Hazardous Waste	452
Michigan	Liquid Industrial Waste Uniform Program	LIW 0609181 MI
Mississippi		NJD080631369
Missouri	Hazardous Waste	H-2146
Montana		NJD080631369
Nebraska		NJD080631369
New Hampshire	Hazardous Waste	TNH-0227
New Jersey	Hazardous Waste	50160
New Jersey	Solid Waste	20071
New Mexico	Hazardous Material	00000835744
New Mexico	Tax ID	0835744
New York	Waste Transporter	NJ-410
New York	Highway Use Tax	Varies
New York City	Fire Department	
New York City	Dept. of Consumer Affairs	Transfer
North Carolina		NJD080631369
North Dakota		WH-586
Oklahoma		3883
Oregon	PUC	217942
Pennsylvania	Hazardous Waste	PA-AH0500
Pennsylvania	PUC Authority	A-00112479
Pennsylvania	Turnpike Commission	1571
Rhode Island	Hazardous Waste	RI-748
Rhode Island	Medical Waste	RI-410
South Carolina	Hazardous Waste NJD080631369	NJD080631369
South Carolina Used Oil Reg	Used Oil Registration	UOT – NJD080631369
South Dakota		NJD080631369

Jurisdiction	Permit Name	Number
Tampa	Solid Waste-recycling	02-002356-PRS
Tennessee	Hazardous	NJD080631369
Tennessee	Radioactive	T-NJ011-L01
Texas	Hazardous Materials	00504177OC
USDOT	Motor Carrier ID	609181
USDOT	RSPA Registration	061103015031L
USEPA	Hazardous Waste	NJD080631369
USEPA	TSCA-PCB Transporter	NJD080631369
Utah	Davis Co. Scavenger & Salvage	Varies Per vehicle
Vermont	Waste Transporter	54013
Virginia	Hazardous	NJD080631369
Washington	Interstate Common Carrier Permit	CC-58568
Wisconsin	Hazardous Waste	16139
Wisconsin	Solid Waste	13800
Wisconsin	Infectious Waste	14520
Wyoming		NJD080631369
OH, OK, IL, NV, WV, MI, MN	Uniform Program Registration	UPW-0609181-OH

Copies of all permits available upon request.

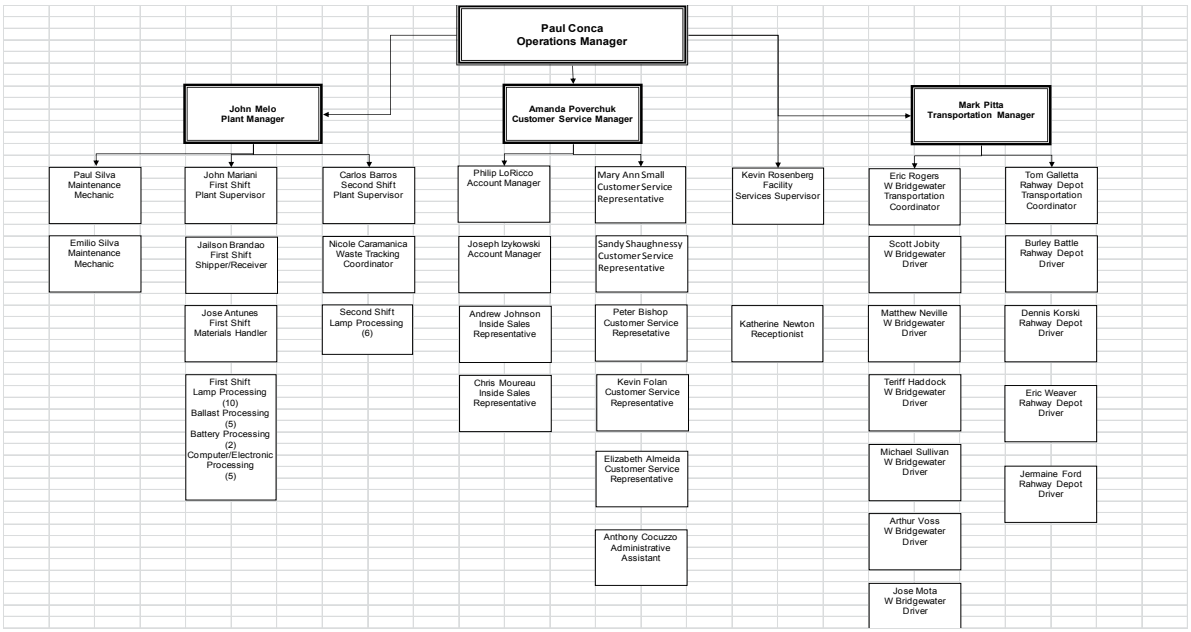
Appendix A
Facility Specific Information

Veolia ES Technical Solutions, L.L.C.
90 Pleasant Street
West Bridgewater, MA 02379
Rev 05/13

Facility Identification Overview

Veolia ES Technical Solutions
90 Pleasant Street
West Bridgewater, MA 02379
Telephone: (774) 296-6030
Fax: (774) 296-6040

West Bridgewater, MA Organizational Chart:



Facility Contacts:

Operations Manager:	Paul Conca	EH&S:	Ryan Buchanio
Transportation:	Mark Pitta	Customer Service:	Amanda Poverchuk
Operations:	John Melo		

Sales Representatives:	**Account Manager**	**Customer Service**
NY, CT, MA, ME, RI, VT, NH:	Phil LoRicco	Amanda Poverchuk
PA, DE, MD, VA, WV, NJ, DC:	Joseph Izykowski	Sandra Shaughnessy
Inside Sales and Marketing Rep:	Andrew Johnson Chris Moureau	Mary Ann Small Peter Bishop Kevin Folan Elizabeth Almeida
Marketing, National Accounts:	Mark Braniff	

Veolia Environmental Services – West Bridgewater, MA

Facility Contact:	Paul Conca
Facility Phone:	774-296-6030
Facility Fax:	774-296-6040
Sales Manager:	Barry Jordan
Sales Phone:	774-296-6030
Sales Email:	Barry.Jordan@VeoliaES.com
Location:	90 Pleasant Street
City:	West Bridgewater
Country:	USA
State:	MA
Zip Code:	02379
USEPA ID#:	MAC300017498
State Regulatory Agency:	http://www.state.ma.us/dep/

Facility Permit Summary:

Part B Permit or Solid Waste Permit Number, Date of Issuance, and Expiration Date	Air Permit Number, Date of Issuance, and Expiration Date	NPDES Permit Number, Date of Issuance, and Expiration Date	Wastewater Discharge Permit Number, Date of Issuance, and Expiration Date	TSCA Permit Number, Date of Issuance, and Expiration Date
Class C Recycling Permit 1RC/2013 Issued 3/28/13 Expires 3/28/18	NA	NA	NA	TSCA Permit MAC300017498 Issued: 4/17/13 Expires: 4/17/23

Facility Description:

The Veolia Environmental Services (VES) facility in West Bridgewater, Massachusetts is a recycler of a variety of lighting and electronic wastes. VES utilizes state of the art recycling technologies to recover and re-use a wide variety of valuable materials. The West Bridgewater facility performs 100% recycling of fluorescent and HID lamps. VES de-manufactures these mercury-containing lamps, reclaiming the glass, metal, powder and mercury. The four lamp components are sold as product from the West Bridgewater facility. No recovered lamp components are shipped from the facility as waste. VES also reclaims mercury from other devices such as thermometers, thermostats, barometers, etc. VES operates its lamp recycling and mercury reclamation processes under a "Class C" Commercial Recycling Permit issued by the Massachusetts Department of Environmental Protection (MADEP). VES operates its PCB ballast recycling operations under a PCB Commercial Storage Permit and an Alternative Decontamination and Sampling Plan (40 CFR 761.79(h)) approved by USEPA.

VES de-manufactures PCB and DEHP ballasts in a controlled environment, producing clean components of metal casing and copper, which are sold for recycling. VES ships capacitors and potting compound removed from PCB lamp ballasts to an USEPA-approved incinerator or secure chemical landfill, depending upon customer requirements. VES recycles DEHP capacitors in accordance with all applicable state and federal regulations. VES is authorized by the Massachusetts Department of Environmental Protection to receive all types of batteries as a universal waste. After receiving, batteries are identified, sorted, or re-packaged for shipment to off-site reclamation facilities. Types of batteries, which can be recycled include Alkaline, Mercury, Carbon Zinc, Nickel Cadmium and Lead Acid/Gel Cell.

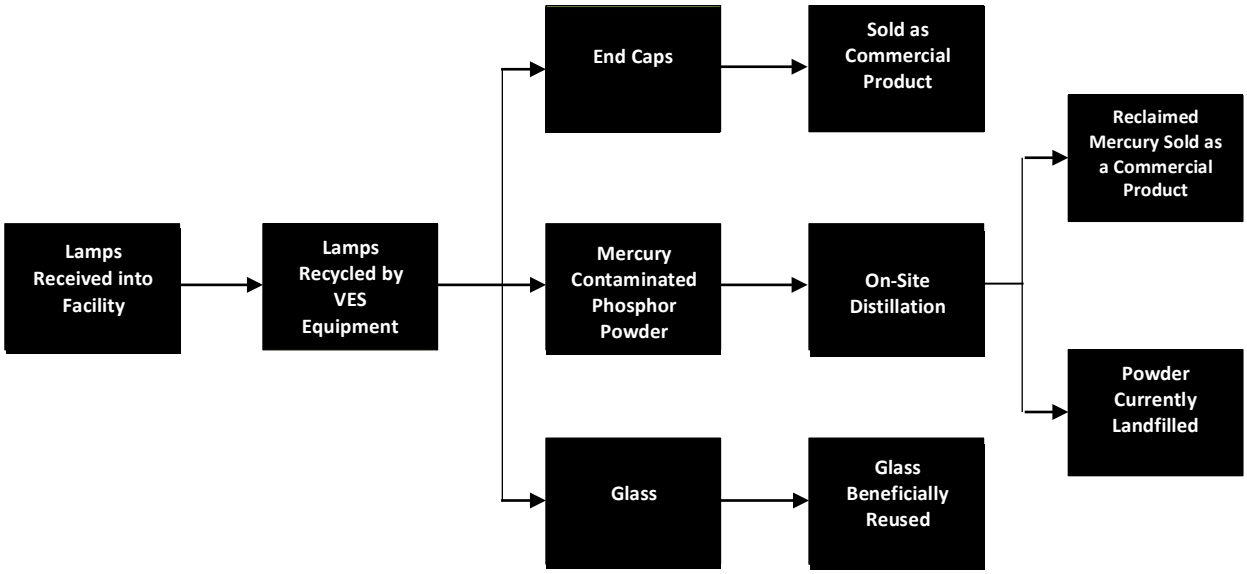
VES also receives cathode ray tubes (CRTs) and computer equipment for dismantling & recycling.

Appendix B
Process Flow Diagrams

Figure #1- Mercury Bearing Lamp Material Process Flow

100% Recycling
**Quality Control Chemical Analysis*

- *Total Mercury*
- *TCLP- Mercury*



HID Lamp Material Process Flow

100% Recycling
**Quality Control Chemical Analysis*

- *Total Mercury*
- *TCLP- Mercury*

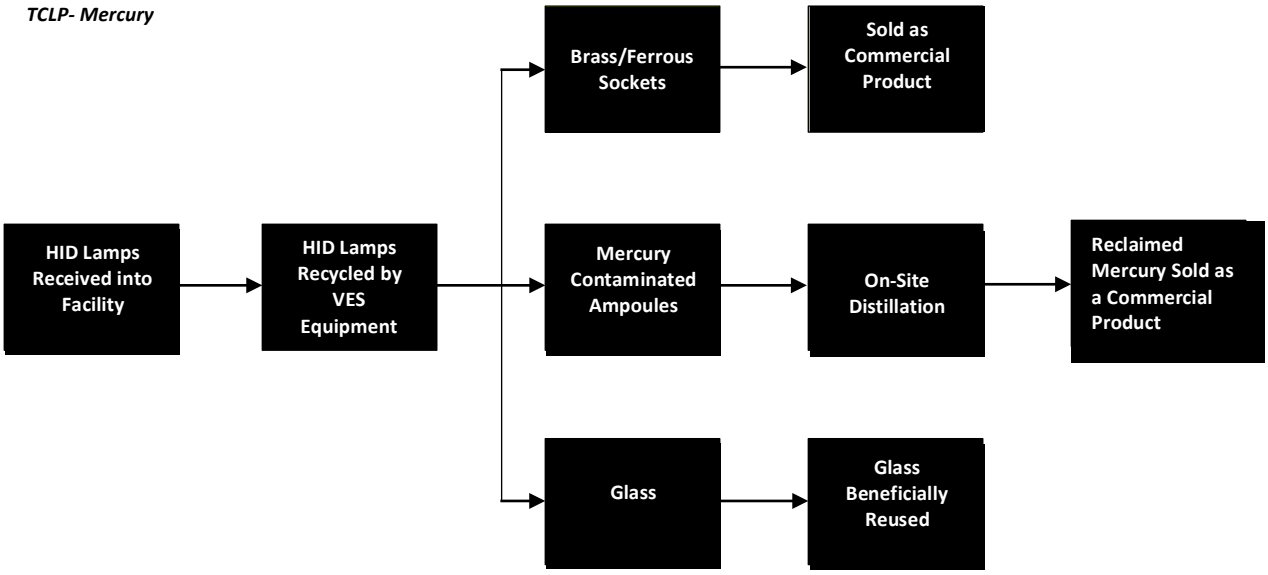


Figure 2- Lamp PCB Ballast Process Flow

Quality Control Chemical Analysis includes:

- ***PCB wipe tests (plates/covers)***
- ***Total PCB concentration (cores)***

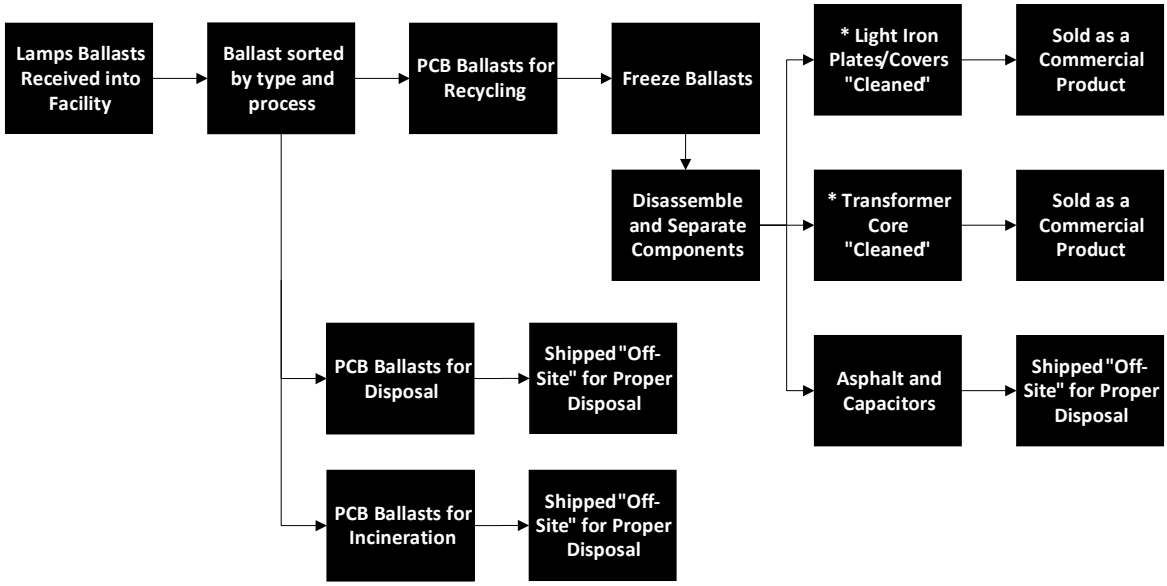


Figure 3- Monitors, CRTs & Electronics Process Flow Chart

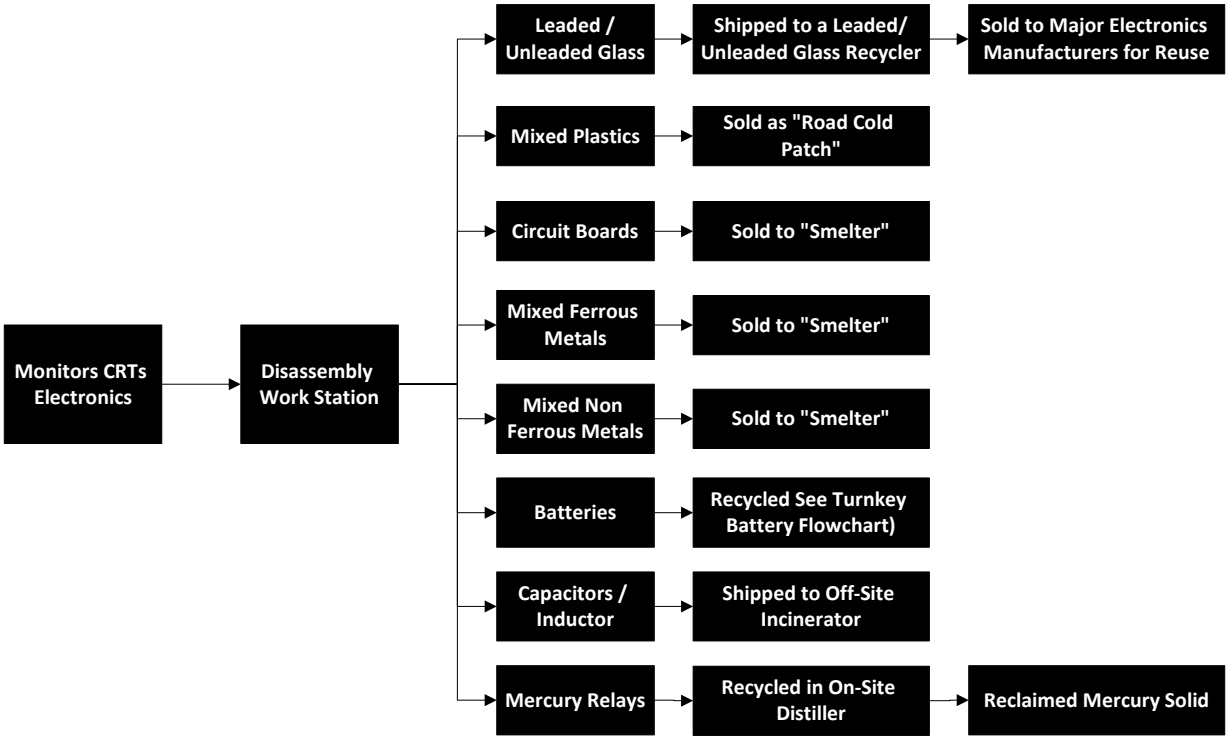


Figure 4- Battery Process Flow Chart

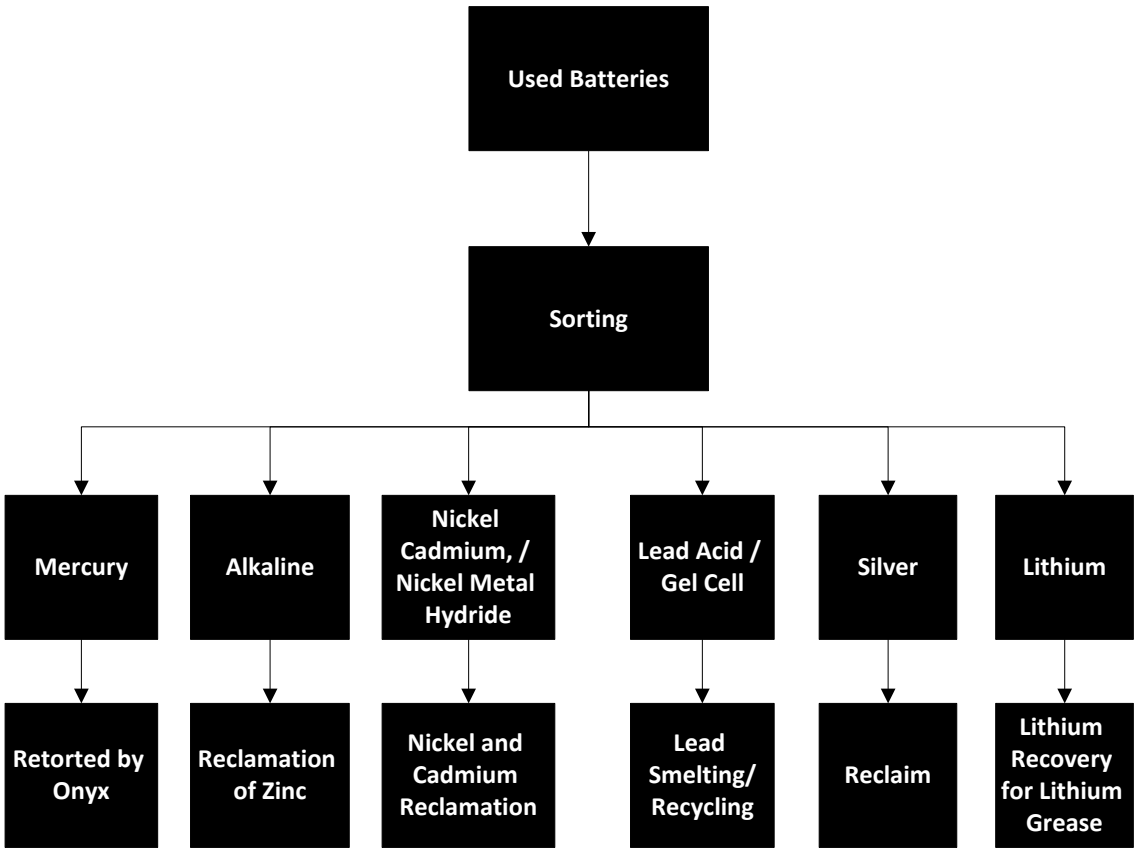
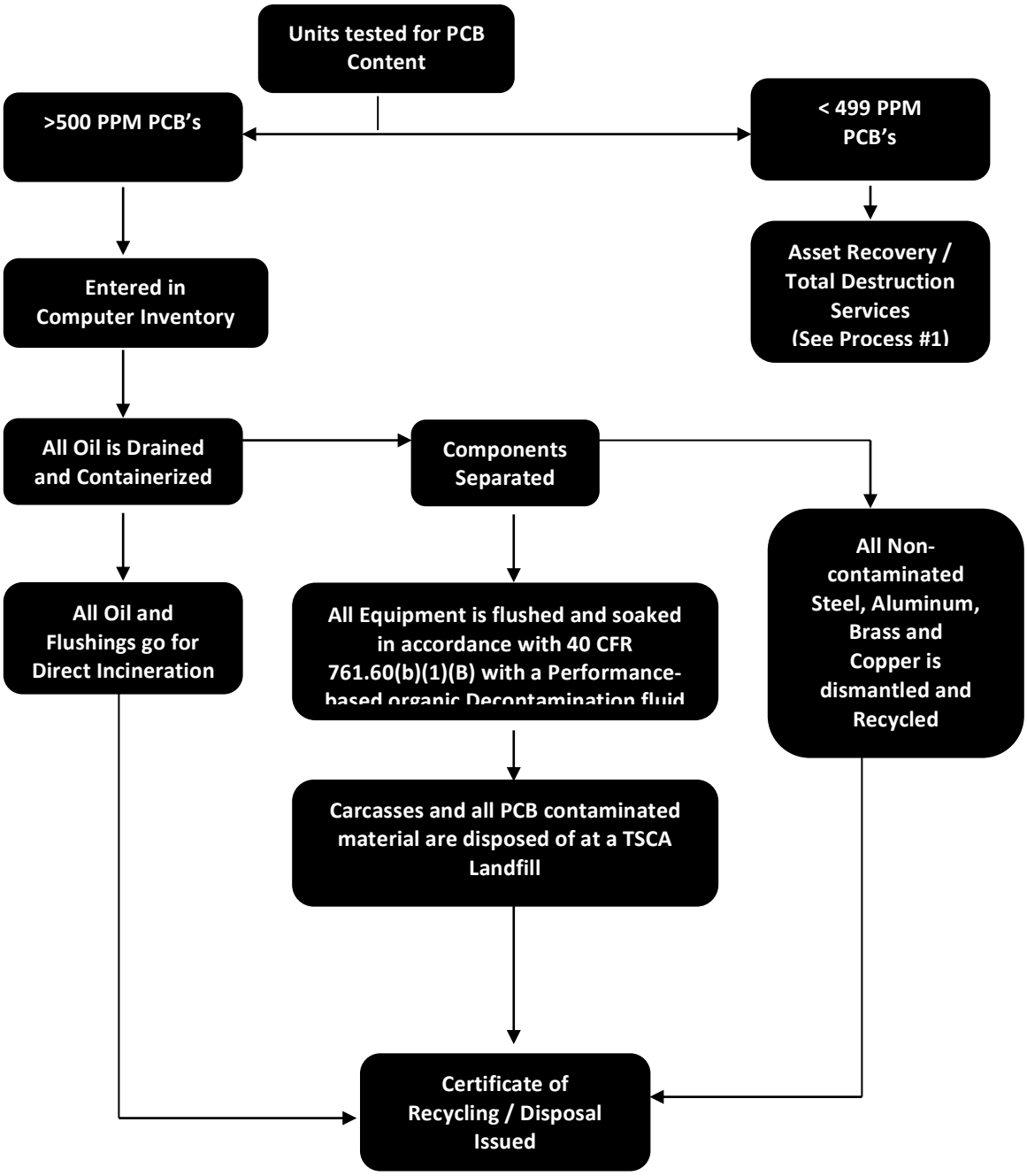


Figure #5- PCB & Non-PCB Electrical Equipment Process Flow Diagram

Figure #6- Recycling of PCB-Electrical Equipment Process Flow Diagram



The above flow chart applies to the Veolia Environmental Services Phoenix, AZ Facility. All material is shipped to the Phoenix facility.

Appendix C
Approved Facilities

Destination Facilities

Veolia Environmental Services (VES) has evaluated, approved, and entered into written agreements with the sites listed below to dispose of all toxic, hazardous and non-hazardous waste. These treatment, storage, and disposal facilities are fully permitted and/or approved by the US EPA and, where appropriate, by respective state/or local agencies.

Disposal by Incineration:

Veolia ES Technical Solutions, L.L.C.
Highway 73, 3.5 Miles west of Taylor Bayou
Port Arthur, TX 77640
US EPA ID No. TXD000838896

Material Disposed:

PCB Debris, Capacitors,
PCB Oil, Potting Compound,
Non PCB Oil, Non PCB Debris
RCRA Incineration

Disposal by Secured Landfill:

Model City
1550 Balmer
Model City, NY 14107
US EPA ID No. NYD0949836679

Material Disposed:

RCRA Treatment & debris encapsulation

EQ- The Environmental Quality Company
1923 Frederick PO Box 673974
Detroit MI 48267-3974
US EPA ID No. MID980991566

Disposal by Treatment

Veolia ES Technical Solutions, L.L.C
1275 Mineral Springs Drive
Port Washington, WI 53074
US EPA ID No. WID003967148

Material Disposed:

RCRA Storage, Labpack Services
HHW Wastes

Computer Recycling

Newtech Recycling, Inc.
111 Chimney Rock Road
Bridgewater, NJ 08807
US EPA ID No. NJR000041038

Computer, CRT and Electronic Scrap

E-Waste Recyclers
81 Fitzgerald Drive Unit 2
Jaffrey, NH 03452
US EPA ID No. NHD510186497

Regulated Electronics
Scrap, Monitors (CRT's)

SIMS Recycling Solutions
5244 Festival Trail
Sally, SC 29173

Computer and Electronic Scrap

Metal / Glass Recycling

DF Goldsmith
909 Pitner Avenue
Evanston, IL 60202
US EPA ID No. ILD025459157

Mercury

Fortune Metals
2 Crow Point Road
Lincoln, RI 02865
US EPA ID No. RID987486164

Regulated Electronics
Scrap, Monitors (CRT's)

Batteries:

Toxco 8090 Lancaster Newark Road Baltimore, OH 43105 US EPA ID No. OHD101614907	Various Batteries
Inmetco 245 Portersville Road Ellwood City, PA 16117 US EPA ID No. PAD087561015	Various Batteries
Interstate Battery 184 Riverview Avenue Waltham, MA 02453	Various Batteries

Appendix D
Compliance History

Compliance History- West Bridgewater, MA

Veolia Environmental Services (VES) purchased the West Bridgewater, MA facility in 2012. Previously the building was used as a book binding facility. The permitting process that was conducted included site inspections by both regulatory authorities, US Environmental Protection Agency (USEPA) Region I and Massachusetts Department of Environmental Protection (MADEP).

VES maintains an excellent record of compliance with regulations governing health and safety and the environment. This record is ready for inspection at any time. A culture of compliance is a way of life at VES, where we manage lighting and electronic waste with the utmost care. We follow procedures meticulously with our on-site teams, and continue to focus on the details throughout transportation, treatment, recycling and disposal.

VES is permitted to operate a lamp recycling and mercury reclamation processes under a "Class C" Commercial Recycling Permit issued by the Massachusetts Department of Environmental Protection (MADEP). The storage and decontamination of PCB ballast are conducted under the authority of USEPA Region I, through a Commercial Storer and Alternative Decontamination and Sampling Plan Approvals.

VES Remains in compliance with all facility permits.

Agency Contacts:

Joseph Tepper
1 Winter Street
Boston, MA 02108
617-292-5905

Daniel Gavin MADEP, SE Region Office,
20 Riverside Drive
Lakeville, MA 02347
508-946-2776

Marianne Millette USEPA, Region I
5 Post Office Square, Suite 100
Boston, MA 02109-3912
617-918-1854

Appendix E
Certificate of Insurance

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY): 04/16/2013

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

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

PRODUCER
*Marsh USA, Inc.
1717 Arch Street
Philadelphia, PA 19103
Attn: veolia.certrequest@marsh.com / 212.948.5053

010056-ES-Poll-12-13 WESTB

CONTACT NAME:
PHONE (A/C, No, Ext): **FAX (A/C, No):**
E-MAIL ADDRESS:

INSURER(S) AFFORDING COVERAGE		NAIC #
INSURER A :	New Hampshire Insurance Company	23841
INSURER B :	Insurance Company Of The State Of PA	19429
INSURER C :	National Union Fire Insurance Co	19445
INSURER D :	Commerce And Industry Ins Co	19410
INSURER E :	Lexington Insurance Company	19437
INSURER F :	Navigators Specialty Insurance Company	36056

INSURED
Veolia ES Technical Solutions, L.L.C.
Electronics Recycling Division
90 Pleasant Street
West Bridgewater, MA 02379

COVERAGES **CERTIFICATE NUMBER:** HOU-002216629-01 **REVISION NUMBER:**

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

INSR LTR	TYPE OF INSURANCE	ADDL INSR	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS		
A	**GENERAL LIABILITY**			GL004572700 ($3m)	07/01/2012	07/01/2013	EACH OCCURRENCE	$	5,000,000
F	X COMMERCIAL GENERAL LIABILITY			CH12XENOA2P58NC ($2m XS of $3m)	07/01/2012	07/01/2013	DAMAGE TO RENTED PREMISES (Ea occurrence)	$	1,000,000
	CLAIMS-MADE X OCCUR						MED EXP (Any one person)	$	10,000
							PERSONAL & ADV INJURY	$	5,000,000
							GENERAL AGGREGATE	$	5,000,000
	GEN'L AGGREGATE LIMIT APPLIES PER:						PRODUCTS - COMP/OP AGG	$	5,000,000
	X POLICY PRO-JECT LOC							$	
B	**AUTOMOBILE LIABILITY**			CA4576281 (AOS) - $5m	07/01/2012	07/01/2013	COMBINED SINGLE LIMIT (Ea accident)	$	7,500,000
B	X ANY AUTO			CA4576282 (MA) - $5m	07/01/2012	07/01/2013	BODILY INJURY (Per person)	$	
B	ALL OWNED AUTOS / SCHEDULED AUTOS			CA4576283 (VA) - $5m	07/01/2012	07/01/2013	BODILY INJURY (Per accident)	$	
H	HIRED AUTOS / NON-OWNED AUTOS			SISCSEL01840512 - $2.5m XS of $5m	07/01/2012	07/01/2013	PROPERTY DAMAGE (Per accident)	$	
								$	
	UMBRELLA LIAB OCCUR						EACH OCCURRENCE	$	
	EXCESS LIAB CLAIMS-MADE						AGGREGATE	$	
	DED RETENTION $							$	
A	**WORKERS COMPENSATION AND EMPLOYERS' LIABILITY** Y / N			WC6517886 (AOS)	07/01/2012	07/01/2013	X WC STATU-TORY LIMITS OTH-ER		
B	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? N	N / A		WC1558356 (FL)	07/01/2012	07/01/2013	E.L. EACH ACCIDENT	$	1,000,000
C	**(Mandatory in NH)**			WC6517888 (CA)	07/01/2012	07/01/2013	E.L. DISEASE - EA EMPLOYEE	$	1,000,000
D	If yes, describe under DESCRIPTION OF OPERATIONS below			WC6517889 (MA/WI/Stop Gap)	07/01/2012	07/01/2013	E.L. DISEASE - POLICY LIMIT	$	1,000,000
E	Pollution Legal Liability			PLS 1364667	07/01/2010	07/01/2013	Each Incident		10,000,000
	Claims Made Form						Aggregate		10,000,000

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

CERTIFICATE HOLDER

Veolia ES Technical Solutions, L.L.C.
Electronics Recycling Division
90 Pleasant Street
West Bridgewater, MA 02379

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE of Marsh USA Inc.

Manashi Mukherjee Manashi Mukherjee

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ADDITIONAL REMARKS SCHEDULE

AGENCY	NAMED INSURED
*Marsh USA, Inc.	Veolia ES Technical Solutions, L.L.C. Electronics Recycling Division 90 Pleasant Street West Bridgewater, MA 02379
POLICY NUMBER	
CARRIER / NAIC CODE	EFFECTIVE DATE:

ADDITIONAL REMARKS

THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM,

FORM NUMBER: 25 **FORM TITLE:** Certificate of Liability Insurance

INSURERS AFFORDING COVERAGE/NAIC #

INSURER G: N/A (N/A)
INSURER H: Starr Indemnity & Liability Company (38318)

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Appendix F
Facility Permits

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Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

DEVAL L. PATRICK
Governor

TIMOTHY P. MURRAY
Lieutenant Governor

RICHARD K. SULLIVAN JR.
Secretary

KENNETH L. KIMMELL
Commissioner

HAZARDOUS WASTE RECYCLING PERMIT

Veolia ES Technical Solutions, L.L.C. Name of Permittee		90 Pleasant Street West Bridgewater, MA 02379 Facility and Mailing Address	
Paul Conca Contact Person	03/28/13 Effective Date	C Class	1RC/2013 Permit No.
774-296-6030 Phone Number	03/28/18 Expiration Date	MAC300017498 EPA Identification No.	

This is to certify that the above named company is authorized to manage regulated recyclable materials pursuant to M.G.L. Chapter 2IC and 310 CMR 30.200.

This permit authorizes recycling of the following materials only:

Material Description	Mass DEP Waste Code	Amounts
Mercury Contaminated Waste	D009*, U151*, D006* D008*, MA95**, MA99	Total - All Waste Codes Included 30,000 tons / year
Elemental Mercury Waste	D009, U151	

* These waste codes pertain to the identification, classification and receipt of mercury contaminated articles.

** This waste code pertains to the identification, classification and mercury contaminated articles, under the Universal, Waste Rule at 310 CMR30.1000.

DESCRIPTION OF RECYCLING OPERATIONS

Reclamation of mercury from mercury contaminated manufactured articles (MCMA).
Reclamation of elemental mercury waste classified as spent material.
Reclamation of elemental mercury waste classified as off-specification batches of commercial chemical products or discarded commercial chemical products or spill residues of either (310 CMR 30.133). It does not include reclamation of chemically bound mercury.

LOCATION OF RECYCLING OPERATIONS

Veolia ES Technical Solutions, L.L.C.
90 Pleasant Street
West Bridgewater, MA 02379

This permit authorizes Veolia ES Technical Solutions, L.L.C. to manage mercury contaminated manufactured articles (MCMA) as Class C regulated recyclable material for the purpose of reclaiming mercury waste, subject to the terms and conditions of this permit.

THIS PERMIT AUTHORIZES ONLY THE NAMED PERMITTEE TO ENGAGE IN THE ACTIVITIES DESCRIBED HEREIN. THIS PERMIT DOES NOT GRANT ANY RIGHTS NOT OTHERWISE GRANTED BY FEDERAL, STATE, OR LOCAL STATUTES, ORDINANCES, OR REGULATIONS. THE PERMITTEE SHALL COMPLY AT ALL TIMES WITH ALL STATE AND FEDERAL REGULATIONS AND STATUTES APPLICABLE TO THE MANAGEMENT OF REGULATED RECYCLABLE MATERIALS.

CERTIFICATION STATEMENT

I, Robert E. Cappadona of Veolia ES Technical Solutions, L.L.C., West Bridgewater, MA, hereby certify under penalty of law that: (1) I have personally examined and am familiar with the information submitted in this document and all attachments hereto and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete; and (2) I have full authority to sign this document on behalf of Veolia ES Technical Solutions, L.L.C., and by doing so, I am legally binding Veolia ES Technical Solutions, L.L.C., to comply with all the requirements set forth in this document. I am aware that there are significant penalties for submitting false information, including possible fines and imprisonment. The Veolia ES Technical Solutions, L.L.C. agrees to comply with all the requirements set forth in this document, (3) the individual whose signature appears below has full authority to sign this document on behalf of Veolia ES Technical Solutions, L.L.C., and that by doing so, he/she is legally binding Veolia ES Technical Solutions, L.L.C.to comply with all the requirements set forth in this document.

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

BY: R. Cappadona Date: 3/22/13
Robert E. Cappadona
Vice President of Service Operations

ISSUED BY THE MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: James Doucett Date: 3/28/13
James Doucett, Acting Director
Business Compliance Division
Bureau of Waste Prevention

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

APR 17 2013

Phillip Ditter, EH&S Manager
Regulatory Affairs
Veolia ES Technical Solutions, L.L.C.
1275 Mineral Springs Drive
Port Washington, Wisconsin 53074

Re: PCB Commercial Storage Facility and Alternative Decontamination and Sampling of PCB Fluorescent Light Ballasts Approval under § 761.65(d) and § 761.79(h)
90 Pleasant Street
West Bridgewater, Massachusetts
EPA ID# MAC300017498

Dear Mr. Ditter:

This is written in response to the Veolia ES Technical Solutions, L.L.C. application for a PCB commercial storage facility and for alternative decontamination and sampling of PCB fluorescent light ballasts at the facility to be located at 90 Pleasant Street in West Bridgewater, Massachusetts (the Site). Veolia previously operated a PCB commercial storage and PCB fluorescent light ballast alternative decontamination facility at 230 Canton Street in Stoughton, Massachusetts. The operations proposed at the West Bridgewater facility are similar to the operations conducted at the Stoughton, Massachusetts facility.

Veolia submitted the application to relocate its current PCB operations to the Site. The following documents have been provided to EPA to support the relocation:

- Revised February 22, 2013 Toxic Substances Control Act *Approval Application for Commercial Storage under 40 CFR § 761.65(d) and Alternative Decontamination under 40 CFR § 761.79(h)* (Application)

- Facility Closure Plan and Cost Estimate, revised February 22, 2013.

- January 30, 2013 Increase to May 29, 2012 Surety Bond #301419 for Veolia ES Technical Solutions, L.L.C., 90 Pleasant Street, West Bridgewater, Massachusetts.

EPA's review of Veolia's Application and EPA's November 8, 2012 PCB compliance inspection and the supplemental information provided by Veolia in response to this inspection, indicate that Veolia meets the requirements to operate a PCB commercial storage facility as set forth in 40 CFR § 761.65(d)(2) and the PCB commercial storage area meets the design requirements specified under § 761.65(b)(1).

EPA is approving Veolia's request to operate a PCB commercial storage facility and to decontaminate PCB fluorescent light ballasts at the Site. EPA has determined that operation of the facility for PCB commercial storage and for the alternative decontamination and sampling of PCB fluorescent light ballasts does not pose an unreasonable risk of injury to human health or the environment provided these operations are conducted in accordance with Veolia's Application and the conditions specified in EPA's approval.

Questions regarding the attached Approval should be directed to:

Kimberly Tisa, PCB Coordinator (OSRR07-2)
U.S. Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
Telephone No: (617) 918-1527
Facsimile No: (617) 918-0527

Sincerely,

James T. Owens, III
Director, Office of Site Remediation and Restoration

cc: P. Conca, Veolia
P. Ditta, Veolia
M. Milette, EPA
File

Enclosure: PCB Commercial Storage Facility and Alternative Decontamination and Sampling of PCB Fluorescent Light Ballasts Approval