Veolia Environmental Services-Technical Solutions L.L.C.
Flanders, NJ Facility

Business and Environmental
Audit Information

VEOLIA
ENVIRONMENTAL SERVICES

March 2010

TABLE OF CONTENTS

I. Corporate Information

II. General Facility Information

III. Facility Permits

IV. Waste Types

V. Waste Analysis

VI. Waste Handling

VII. Water Management

VIII. Transportation Practices

IX. Safety

X. Preparedness & Prevention

XI. Compliance Management Programs

XII. Incident History

XIII. Closure/Insurance

XIV. Attachments

CORPORATE INFORMATION

Parent Company Name: Veolia Environment

Address: 42 Avenue de Friedland, 75380 Paris Cedex 08, France

Telephone: 800-269-2377

Describe Company Ownership:

Veolia ES Technical Solutions (VESTS) is a division of Veolia Environmental Services (VES), which is a wholly owned subsidiary of Veolia Environment.

Veolia Environmental Services also includes: Veolia Water, Veolia Energy, Veolia Transportation.

Federal Identification Number: 36-4287998

Year Company was established: 1999

Dunn and Bradstreet Number: 08-218-4156

National Locations:

TSD Facilities - Flanders, NJ / Creedmoor, NC / Richmond, CA / Menomonee Falls, WI/ Phoenix, AZ / Morrow, GA / Tallahassee, FL

TSDF Fuels Facilities – Middlesex, NJ / Azusa, CA / Henderson, CO / W. Carrollton, OH

TSDF Incinerator Facilities – Sauget, IL / Port Arthur, TX

Other Locations – Veolia (VES) also operates numerous in-transit storage locations and sales/service offices throughout the country.

Veolia Audit Contacts:

John Schantz
New Jersey Branch Environmental, Health, & Safety Manager
973-691-3923

Dave Flood
New Jersey General Manager
973-347-7111

GENERAL FACILITY INFORMATION

Facility Name:	Veolia ES Technical Solutions
Address:	1 Eden Lane, Flanders, New Jersey 07836
Twp./County/Telephone:	Mt. Olive Township/Morris County / (973) 347-7111
Branch Management:	Dave Flood, General Manager Gerald Schlomer, Operations Manager Jeannine Jensen, Facility Manager John Schantz, EH&S Manager
EPA ID Number:	NJD 980 536 593
SIC/NAICS Code:	4953/562211
Property ownership status:	The site is owned by Veolia Environmental Services.
Facility Size:	37,000 sq. ft.
Property Size:	6.01 Acres
Total active area:	Approx. 3 acres
Facility Layout:	See Attachment #1
Hours of Operation:	Monday - Friday, 6:00 am - 10:00 pm
Number of Employees:	Approximately 90 at this location

Site History:

This Veolia facility is located in the North-central portion of New Jersey, about 40 miles due West of New York City. The land was previously undeveloped prior to 1988. The facility began operation at this location on April 3, 1989 as Advanced Environmental Technology Corporation (AETC). Due to a merger in March 1994 AETC became Advanced Environmental Technical Services (AETS). As the result of a sale in June 1999, Onyx Environmental Services (ONYX) was formed. On July 1, 2006 the company changed their name to Veolia ES Technical Solutions (VESTS).

Expected life span of facility: Indefinite

Surrounding Area Description:

Light industrial area. Neighbors consist of a hazardous waste transportation company (north), inactive quarry (west), undeveloped land (south), and office space (east). Landscaped surroundings consists of shrubs and trees.

Proximity to:

Residences:	Approximately 2000 feet - North
Industrial Buildings:	1000 feet
Schools:	2-3 miles
Parks:	3 miles
Hospitals:	9 miles - Hackettstown Hospital
Fire Dept.	3 Miles – Budd Lake Volunteer
Potable Wells:	On-site
Flood Plain:	The facility is not located in a flood plain.
Rivers:	0.5 miles - Wills Brook
Lakes:	Less than 2 miles from Lake Musconetcong
Airports:	20 miles - Morristown Airport
	40 miles - Newark International Airport

Security:

The site is surrounded by a six-foot chain link fence and has surveillance cameras. There are “Danger - Unauthorized Personnel - Keep Out” signs posted at each facility entrance. There is no history of problems with unauthorized entry or vandalism.

Site Topography:

A USGS topographic map is available for review.
The facility is not within 200 feet of an active geologic fault.

General hydro geologic setting:

The soil on-site and the surrounding area is classified by the United States Department of Agriculture (USDA) as Rockaway gravelly sandy loam, 8 to 15% slopes.

The population within 1 mile and 3 miles of the site:

Population in Netcong (1 mile) =	2580 (2000)
Population in Budd Lake (3 miles) =	8100 (2000)

Prevailing wind direction/speed: West, 12-13 mph

Community relations:

Veolia maintains excellent relations with neighbors and the surrounding community. Veolia participates and assists with several local organizations, including:

- Givaudon Fragrance Community Advisory Panel
- Morris County Infrastructure Advisory Group
- Chemistry Council of New Jersey
- New Jersey Chamber of Commerce
- March of Dimes
- Adopt-A-Highway

Veolia also supports the following local fire and police departments by providing training and supplies as needed:

- Flanders Fire and Rescue
- Budd Lake Fire and Rescue
- Mount Olive Police Department
- Roxbury Police Department

Underground storage tanks at the facility:

In August 1998 two underground heating oil storage tanks were closed and removed. This action was based on a new opportunity to connect to local natural gas utilities and the need for tank upgrades to comply with upcoming NJ DEP regulations. Both tanks proved to be completely intact and no soil remedial actions were necessary.

FACILITY PERMITS

RCRA Part A (EPA ID # NJD 980 536 593):

AETC submitted the initial application in 1987 and a renewal application in 1992. In 1999 the name was changed to Onyx Environmental Services, L.L.C. In 2006 the name was changed to Veolia ES Technical Solutions, L.L.C.

RCRA Part B application:

The Part B renewal application was submitted on 9/31/03 and reviewed and approved in November 2006. Issuance Date: 11/22/06; Expiration Date: 11/22/11

A copy of Part B Permit No. HWP030002 is available for review. A copy of the cover sheet is in Attachment #2.

TSCA Waste Storage:

Veolia is approved as a commercial storer of TSCA waste (PCBs) at the Flanders, NJ facility, however, we are no longer required to have a separate PCB commercial storage approval issued; pursuant to 40 CFR s761.65(d).

CERCLA Waste Acceptance:

Veolia is authorized to accept CERCLA regulated waste streams for storage and transfer to CERCLA authorized treatment and disposal facilities.

Major differences between the State and RCRA regulations:

New Jersey has been granted RCRA authority by the EPA. New Jersey regulations now generally are the same as the federal regulations with regards to generator standards.

Acceptability of non-hazardous waste for storage:

Veolia has been issued a permit to accept both hazardous and non-hazardous “solid” waste. Non-hazardous wastes are not required to be on a hazardous waste manifest. For tracking purposes Veolia requires the use of either a hazardous waste manifest or a non-hazardous manifest for receiving non-hazardous wastes.

New Jersey Solid Waste Codes:

ID10 – Household Hazardous Waste
ID27 – Dry Industrial Waste solids
ID27A – Asbestos
ID72 – Non-hazardous Liquid and Semiliquids

Maximum capacity of the facility:

Currently, the facility can store 3400 - 55 gallon drums or the equivalent volume (187,000 gallons).

Water permit:

Veolia discharges site storm water under NJPDES General Permit No. NJ0088315, NJPDES #: NJG0065102, PI ID #:49126. This permit presently requires no discharge monitoring. Permit expiration is 5/31/12. A copy of the permit is in Attachment #3.

Permit for storage of flammables:

Veolia has a flammable storage permit (No. 01046) issued by the Mt. Olive Bureau of Fire Protection. This permit is renewed each year.

Discharge Prevention Containment and Countermeasure/Discharge Cleanup and Removal Plan (DPCC/DCR):

As required by N.J.A.C. 7:1E-4.2 + 4.3; Veolia has an approved DPCC/DCR plan (DIFF# 142700341000). The plan was renewed effective on March 19, 2007 and expires on March 19, 2010. A copy of the approval letter is in Attachment #4.

Inspections/Frequency/Contact:

Agency	Frequency	Contact	Phone #
NJDEP-Waste	Quarterly	Paula Hanley-Tagliaferri	(973) 656-4470
EPA-Region II	Annually	John Wilk	(212) 637-4130
EPA – TSCA	Annually	Vivian Chin	(732) 906-6179
NJDEP-Water	Annually	Christopher Brindle	(973) 656-4099
NJDEP-DPCC	Annually	Gary Sobin	(609) 984-7573
Mt. Olive Fire	Annually	Fred Detoro	(973) 691-0900

Latest inspection results:

A copy of the most recent NJDEP inspection is available on request. The facility is in compliance with all permit conditions.

WASTE TYPES

Waste types handled at the facility:

Bulk:	X Liquid	X Solid	X Sludge	
Containerized:	X Liquid	X Solid	X Sludge	X Gas

Waste characteristics handled at the facility:

X Corrosive X Ignitable X Toxic X Reactive __ Radioactive

Types of hazardous materials handled: **All RCRA codes are acceptable**

Chemical	Yes	No	Comments
Organics	X	__	_____
Oils	X	__	_____
Halogenated Solvents	X	__	_____
Non-halogenated Solvents	X	__	_____
Insecticides	X	__	_____
Herbicides	X	__	_____
Chlorinated Hydrocarbons	X	__	_____
Phenols	X	__	_____
PCBs	X	__	_____
Paint, Pigments	X	__	_____
Explosives	__	X*	_____
Cyanides	X	__	_____
Water Reactives	X	__	_____
Inorganics:			
Acids	X	__	_____
Bases	X	__	_____
Metals	X	__	_____
Sludges:			
Metal	X	__	_____
Sewage	_	X	_____
Radioactive	_	X*	_____
Asbestos	X	__	_____
Pharmaceutical	X	__	_____
Pathological	_	X*	_____
Lab Packs	X	__	_____

*Currently Veolia manages the following waste types: Explosive, Radioactive and Regulated Medical Waste (RMW), through direct transportation of these materials from the customer's location to the ultimate waste management facility.

WASTE ANALYSIS

Waste Identification:

Veolia requires a Waste Information Profile (WIP) (Attachment #5) be completed and certified by the generator prior to waste shipment to the facility. The information regarding waste identification can be from generator knowledge or chemical analysis.

Based on the information provided in the WIP, the wastestream is assigned a DOT proper shipping name, EPA or state waste codes, and an ultimate treatment facility approval code. The WIP is wastestream and generator specific and a unique WIP number is assigned to each wastestream.

If the generator cannot accurately complete the WIP, a sample of the waste will be taken at the generator's facility.

The approval for the management of waste streams at the ultimate treatment facilities must be obtained prior to acceptance of the waste stream at the Flanders Veolia facility.

Written waste analysis plan:

A copy of the Waste Analysis Plan (WAP) section is included in Attachment #6.

The Waste Analysis Plan (WAP) was developed in accordance with 40 CFR s264.13(b) and will be available at the facility at all times. The WAP will be reviewed regularly to ensure compliance with all regulatory standards and standard operating procedures.

The objective of the WAP is to ensure proper classification, transportation and storage of the specific waste as well as safe handling at both Veolia and the ultimate disposal facility. The WAP is designed to perform all waste identification, sampling and analysis at the generator's site prior to transportation and acceptance by the Veolia facility.

WASTE HANDLING

Methods of Waste Treatment and Disposal:

Veolia utilizes a number of off-site facilities for treatment of waste including recycling, wastewater treatment, fuel blending, incineration, and landfill. Veolia can provide assistance to the generator in this selection. A partial list of authorized treatment facilities approved by Veolia is included in Attachment #7.

Additionally, Veolia is permitted to perform the following operations at the Flanders facility:

- Consolidation of Non-Hazardous Liquids into Tank Trucks
- Consolidation of Hazardous Lab Pack Containers into DOT Drums
- Venting of Non-Hazardous Inert Gases
- Pressure Checking of Cylinders

Periodic Environmental Audits of the Off-site TSDFs utilized:

Veolia conducts routine environmental audits of all (internal and 3rd party) off-site TSDFs utilized. For specific information, contact Tom Baker of Veolia at (973) 691-7330.

Services Offered by Veolia:

Services include hazardous/non-hazardous waste disposal, lab pack disposal, general field services, empty drum disposal, transportation, emergency spill response, reactives handling, tank cleaning, analytical lab services, and environmental training.

Veolia also manages certain wastes, which are not acceptable for storage at the Flanders facility, by arranging for transportation directly to the disposal site.

Waste Water Management:

There is no wastewater generated as the result of the treatment of waste at this location.

Disposition of Site Generated Waste:

Plant scraps, waste oil (from on-site maintenance of vehicles), batteries, fluorescent lamps, cleaning solution, and aerosol cans, are occasionally generated at the facility. These wastes are classified accordingly and sent for off-site treatment or disposal.

Veolia Flanders does have a Waste Minimization Plan that complies with the waste minimization certification required by Sections 3002 (b) and 3005 (h) of the Resource Conservation and Recovery Act (RCRA).

Disposition of Empty Drums:

Empty drums are sent to an authorized facility for drum reconditioning or recycling.

Emissions Controls:

All wastes are stored in containers that remain closed. All Veolia container management operations comply with Subpart CC requirements.

Area in which wastes are delivered to the site:

Materials are off-loaded from straight-bed trucks onto the loading dock. Following a waste acceptance inspection the waste is transferred into a trailer destined for the ultimate treatment facility or into the Shipping/Receiving area, located adjacent to the dock. Waste is typically stored at the facility for 7-10 days before leaving for the ultimate disposal site.

Equipment utilized to unload waste materials:

Equipment such as pallet jacks, drum trucks, and forklifts are utilized to move the containers. Shrink-wrap is used to secure smaller containers to pallets for safe transportation.

Unloading and storage area containment system:

The loading dock and waste storage areas are provided with secondary containment. Containment consists of bermed concrete pads that are equipped with a trench drain system. The trenches are provided with manually controlled valves. The trench system leads to a containment basin with an impervious concrete base.

The containment system capacity is adequate to contain 10% of the total volume of containers and accumulated rain waster as required by NJDEP.

Loading and Unloading practices:

All wastes are loaded and unloaded as specified in 49 CFR 177.834 and stored and segregated in accordance with DOT regulations under 49 CFR 177.848.

Labeling, placarding, marking, and packaging system used:

All containers are packaged, labeled and marked in accordance with 49 CFR.

Container Storage:

Wastes are stored in DOT acceptable containers. Containers are compatible with waste contained within them. Ignitable and reactive wastes are stored at least 50 feet from the facility's property line.

Frequency of container storage area inspection:

A daily inspection of the containers, storage areas, trailers, trench drains, security and emergency equipment is completed and documented by the facility manager or facility supervisor.

Additionally, the facility manager completes a monthly inspection of all emergency response equipment.

Average and maximum storage times:

Average container storage time:	7 - 10 days
Maximum allowable storage time:	1 year

Volume Handled:

Veolia has managed approximately 20 million pounds of waste through the facility in each of the last 4 years. Generally 60% of the waste is RCRA Hazardous and 40% is Non-Hazardous or Universal Waste.

Approximately 60% of the waste managed at the facility is from Flanders branch customers. The additional 40% comes from other Veolia 10-day operations, including: Philadelphia (PA), Albany (NY), and Gurabo (PR).

Laboratory Services:

Laboratory services are available upon request. The Flanders facility does not maintain an analytical laboratory. All laboratories utilized are certified by either NJ-ELCP or NELAP.

Waste Tracking System:

Veolia field service personnel, at the customer site, input waste shipment information directly into a laptop computer and a bar code label with a unique container number is placed on each container. Upon arrival at the Flanders facility this data is downloaded into the AS/400 computer tracking system. Individual container numbers and manifest numbers track all containers through the facility to off-site treatment.

Veolia issues Certificates of Tracking (COT's) to clients indicating receipt of material at the ultimate treatment facility. In addition, pertinent documents such as manifests, land bans, COT's, and COD's are kept on file at the facility, indefinitely.

WATER MANAGEMENT

STORM WATER:

Run-off controls for Storm Water: All storm water coming into contact with the active portion of the facility is collected in a trench system and containment basin. The release from the containment basin is manually controlled.

Storm water testing methods: The storm water is discharged after visual inspection and verification that no spills have occurred that could have possibly contacted the storm water. Routine testing is presently not required under the General Discharge Storm Water Permit. A copy of the NJDEP General Discharge Permit is in Attachment #3.

Best Management Practices Plan: Veolia has implemented a storm water pollution prevention plan that includes several best management practices and an inspection program. The SWPP Plan is available for review upon request.

DRINKING WATER:

Veolia is classified as a non-transient, non-community water system.

The drinking water is tested for periodically in accordance with NJDEP regulations for the following (Licensed operator is McGowan Well Water Compliance):

Coliform
Nitrates
Nitrites
Volatile Organic Compounds
Lead and Copper
Inorganics and Secondaries

GROUNDWATER:

The facility is not required to conduct groundwater monitoring. The depth of groundwater is 13 feet on the Veolia property.

The closest groundwater used as a source of drinking water in the area is on the Veolia property.

TRANSPORTATION PRACTICES

Vehicles:

Veolia is a primary provider of hazardous waste transportation services. Veolia New Jersey maintains approximately: 5 tractors, 15 tank trucks, 10 closed trailers, 17 straight trucks, 12 pick-ups, 6 vans and an air induction vehicle, at the Flanders and Middlesex locations.

Veolia is permitted to transport waste in approximately 40 states. A list of states and transporter permit numbers is in Attachment #8.

Additionally, Veolia uses subcontractors to supplement its fleet. Transporters are approved based on their permits, insurance, and compliance with the motor carrier safety regulations. A partial list of authorized transporters approved by Veolia is in Attachment #9.

Brokerage:

Veolia, as a hazardous waste management company, has the capabilities to manifest waste directly from the client's facility to the ultimate treatment facility. Approved subcontractors are used for these shipments.

Security:

Veolia has developed and implemented a security plan compliant with the requirements of 49 CFR, Part 172, Subpart I. In addition, Veolia's employee training program includes security awareness and in-depth security training as required by 49 CFR s172.704.

SAFETY

All accidents and incidents are recorded on an Accident/Incident Investigation Report Form and reviewed by the employee manager, EH&S Manager and Branch Manager.

The person responsible for overall safety at the Flanders, NJ location is John Schantz, Branch Environmental Health & Safety Manager. Additionally, Veolia has a full time Director of Safety; Mike Richter.

The following personnel are authorized to conduct accident investigations and job safety inspections:

Company Safety Director
Operations Manager
EHS Manager
Project Managers

Frequency of job safety inspections:

Veolia performs monthly facility inspections and random field safety inspections. These inspections are generally performed by the Project Managers.

Safety meetings:

Project Supervisors hold daily "tailgate" safety meetings to complete Safety Plans and review safety requirements. The Branch Safety Committee holds quarterly meetings. The branch also conducts monthly safety meetings to review accidents and safety rates.

Training:

All field and facility personnel attend a nine-day orientation training program that exceeds the 40-hour OSHA training requirements. Additionally there is an annual 8-hour refresher and a 2-hour monthly safety meeting. A complete copy of the training programs can be found in Attachment #10.

OSHA 200 forms are posted within the facility (copies available on request):

	2007	2008	2009
Veolia Flanders OSHA Recordable Rate:	6.22	1.33	0.87
Veolia Flanders OSHA Lost Time Accident Rate:	1.78	0.67	0.00
Veolia Flanders OSHA Severity Rate:	12.44	1.33	0.00

A copy of the 6-year OSHA 200 Log summary can be found in Attachment #11.

PREPAREDNESS & PREVENTION

Written contingency plans:

The facility maintains a Contingency Plan and Emergency Procedures as well as a Discharge Prevention Containment and Countermeasures plan approved by the NJDEP. Both plans are available for review upon request. Copies of the contingency plan have been distributed to local authorities in accordance with state and federal regulations.

The facility has also completed a USDOT Security Plan and site vulnerability and risk assessment. All employees have been trained in security awareness and in-depth security training.

Emergency Response:

- Periodic emergency response drills, mock spills and fire drills are conducted at least annually.
- The facility maintains adequate aisle space for equipment access in the event of an emergency; 18-inch aisle space is required in waste storage areas, by the Part B Hazardous Waste Permit.
- The facility maintains an extensive inventory of emergency equipment. An equipment list is available (contained in the Contingency Plan). Emergency equipment stations are placed throughout the facility.
- Fire extinguishers are placed strategically on the loading dock area and throughout the building.
- The facility has a written inspection policy/procedure including a checklist of items to look for during inspections.

Training:

Veolia has an extensive internal training program including 40-hour OSHA, Hazard Communication, Security, Reactive Chemical, Emergency Response, Confined Space Entry, DOT HM-126F, Lockout/Tagout, Bloodborne Pathogens, Hearing Conservation, Electrical Safety, Forklift Safety, and CPR and First Aid training programs. Summary of classes is available in Attachment #10.

Employee Monitoring:

Employees are given annual performance reviews. In addition, field personnel participate in a comprehensive testing program where they are evaluated in terms of on-the-job performance, knowledge and skills. In order to advance, they must successfully pass the testing program.

COMPLIANCE MANAGEMENT SYSTEMS

Veolia follows a four (4) part approach to assuring compliance with federal, state, and local regulations and company policies. The program is known by its acronym, PACT. A demonstration of these systems can be provided upon request.

Prevention: Veolia uses an internal Environmental Management System (EMS). This program helps to assure compliance by creating a calendar and monthly task assignment forms related to compliance issues. Tasks include start and due dates, person assigned, and a description of actions required. Once completed, the task is entered as such in the system.

Assessment: Veolia utilizes a two-phase audit system to assure consistency and compliance of our facilities nation-wide; Peer Audits and Self Assessments.

> Peer Audits of Veolia facilities are conducted by groups composed of Veolia employees assembled from multiple locations. These audits are completed at the Middlesex facility every two years.
>
> Self-Assessments are conducted by teams composed of facility and branch employees. The Self-Assessments are completed on various management areas throughout the year, with a goal of 50% of the management areas being completed each year.

Corrective Action: Veolia uses the software package Dakota - Tracer to track progress related to correcting compliance issues. Issue reports include due dates, root cause analysis, corrective and preventive actions, and person assigned. Tracer issues are transmitted to corporate directors on a monthly basis for review.

Training: In addition to the training regimen outlined in **Attachment #10**, the Veolia Middlesex facility holds biweekly training sessions with all Branch Employees covering compliance, safety, and other policy issues.

INCIDENT HISTORY

Site spill history:

Veolia has not experienced any spills requiring reporting to the National Response Center.

The last reportable discharge occurred in 1996 when a service vehicle fuel filter leaked and released approximately 10 gallons of diesel fuel onto the asphalt surface. The discharge was reported to NJDEP and remediated per regulatory requirements outlined in the DPCC/DCR Plan.

The facility has never experienced a fire or explosion involving waste materials. There has never been a major incident at the facility where employees were injured requiring medical attention or hospitalization.

Consent Orders:

The facility is not currently under a Consent Decree or Order. There are no corrective actions, remedial actions, or other types of clean-up operations being conducted at the site.

The facility is not currently listed on or considered for listing on the National Priorities List.

Compliance History:

Veolia maintains an excellent compliance history. A complete (five year) summary is available in Attachment #12.

The Veolia facility in Flanders, NJ has received the EI Digest perfect compliance award for eight of the last thirteen years: 1997, 1998, 1999, 2000, 2002, 2004, 2006 and 2008.

CLOSURE/INSURANCE INFORMATION

Closure Plan:

Plan includes (Copies available on request):

- A description of how and when the facility will be closed.
- A description of the steps necessary to decontaminate facility equipment during closure.
- Anticipated date for final closure:

  January 2021

- Closure Cost Estimate:

  Adjusted annually for inflation in October – Copies are available on request.

Financial Assurance Mechanism:

Surety Bond – Copies available on request.

Written post-closure plan:

There will be no wastes, residues, or contaminated soils remaining at the site after closure activities are completed. Therefore, no post-closure care will be necessary at the facility.

Insurance (A copy is in Attachment #13):

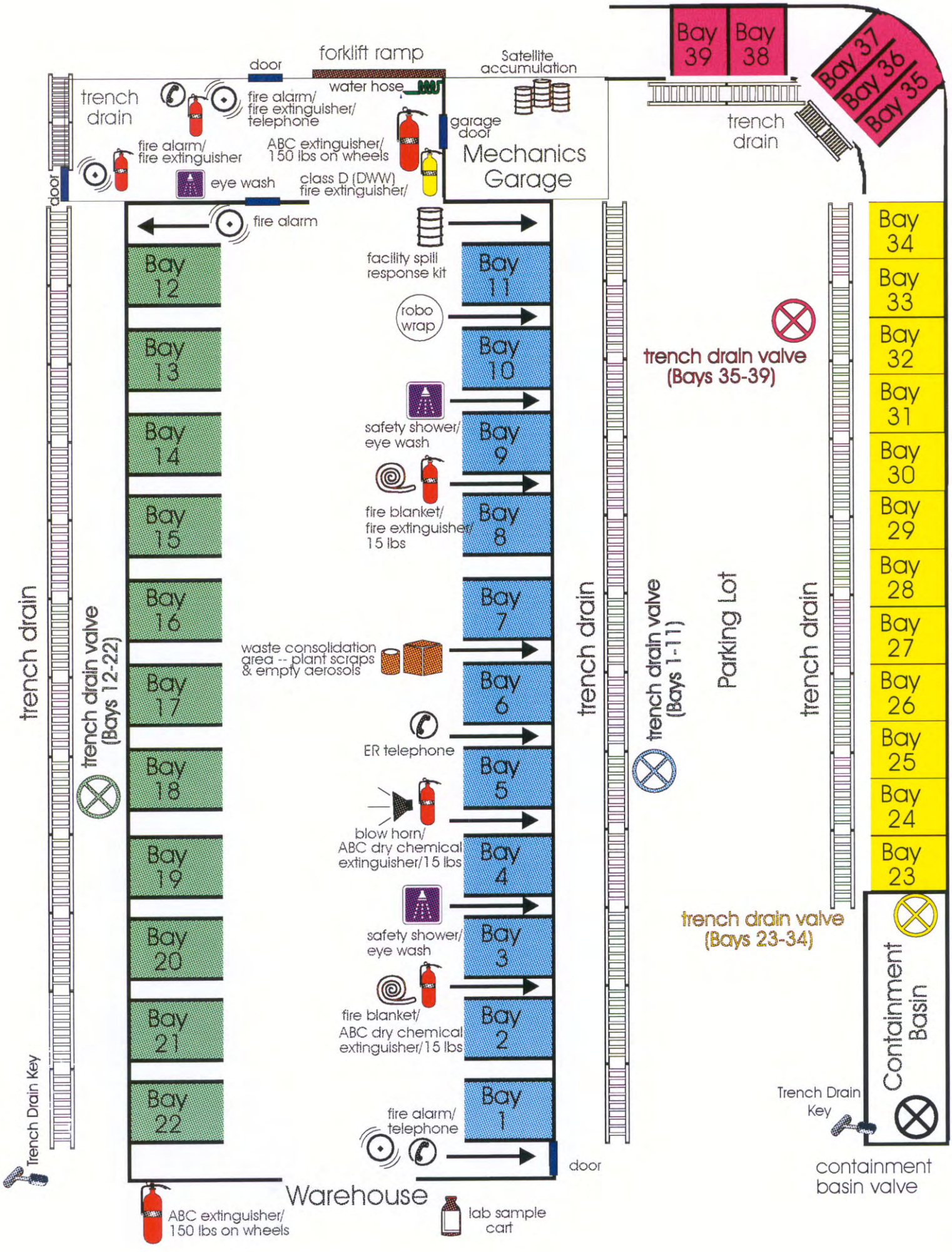
Marsh USA Inc., Houston, TX

- $1MM General Liability
- $5MM Excess Liability
- $15MM pollution legal liability

ATTACHMENTS

1. NJ Facility Layout
2. Facility Part B Permit Cover Page
3. NJPDES Storm Water Permit
4. DPCC/DCR Plan Approval Letter
5. Waste Information Profile (WIP)
6. Waste Characterization and Analysis Plan (WAP)
7. Veolia Authorized Treatment Facilities
8. Veolia Transporter States and Permit Numbers
9. Veolia Subcontracted Transporters
10. Description of Training Classes
11. 5-Year OSHA Summary
12. 5-Year Compliance History
13. Veolia Insurance Coverage Summary

1. NJ Facility Layout


Bay 39
Bay 38
Bay 37
Bay 36
Bay 35
forklift ramp
door
Satellite accumulation
water hose
trench drain
fire alarm/ fire extinguisher/ telephone
garage door
trench drain
fire alarm/ fire extinguisher
ABC extinguisher/ 150 lbs on wheels
Mechanics Garage
door
eye wash
class D (DWW) fire extinguisher/
fire alarm
facility spill response kit
Bay 12
Bay 11
robo wrap
Bay 13
Bay 10
trench drain valve (Bays 35-39)
Bay 34
Bay 33
Bay 32
safety shower/ eye wash
Bay 14
Bay 9
Bay 31
Bay 30
fire blanket/ fire extinguisher/ 15 lbs
Bay 15
Bay 8
Bay 29
Bay 28
trench drain
trench drain valve (Bays 12-22)
Bay 16
Bay 7
waste consolidation area -- plant scraps & empty aerosols
Bay 17
Bay 6
Bay 27
Bay 26
ER telephone
trench drain
trench drain valve (Bays 1-11)
Parking Lot
trench drain
Bay 18
Bay 5
Bay 25
Bay 24
blow horn/ ABC dry chemical extinguisher/15 lbs
Bay 19
Bay 4
Bay 23
safety shower/ eye wash
trench drain valve (Bays 23-34)
Bay 20
Bay 3
fire blanket/ ABC dry chemical extinguisher/15 lbs
Containment Basin
Bay 21
Bay 2
Trench Drain Key
Bay 22
Bay 1
fire alarm/ telephone
door
Trench Drain Key
containment basin valve
Warehouse
ABC extinguisher/ 150 lbs on wheels
lab sample cart

2. Facility Part B Permit Cover Page

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JON S. CORZINE
Governor

LISA P. JACKSON
Commissioner

Solid & Hazardous Waste Management Program
P.O. Box 414
Trenton, NJ 08625-0414
Tel. No. (609) 984-5950
Fax. No. (609) 633-9839

Solid and Hazardous Waste Facility Permit

Under the provisions of N.J.S.A. 13:1E-1 et seq. known as the Solid Waste Management Act, this permit is hereby issued to:

VEOLIA ES TECHNICAL SOLUTIONS, LLC
1 Eden Lane
Flanders, NJ 07836

For the Purpose of Operating a:	Solid and Hazardous Waste Storage and Transfer Facility
Lot & Block Nos:	Lot 37, Block 4500
In the Municipality of:	Mount Olive Township
County:	Morris
Under Facility Permit No.:	HWP030002
EPA ID No.:	NJD980536593

This permit is subject to compliance with all conditions specified herein and all regulations promulgated by the Department of Environmental Protection.

This permit shall not prejudice any claim the State may have to riparian land, nor does it allow the permittee to fill or alter or allow to be filled or altered in any way, lands that are deemed to be riparian, wetlands, stream encroachment areas or flood plains, or that are within the Coastal Area Facility Review Act (CAFRA) zone or are subject to the Pinelands Protection Act of 1979, nor shall it allow the discharge of pollutants to waters of this State without prior acquisition of the necessary grants, permits, or approvals from the Department of Environmental Protection or the U.S. Environmental Protection Agency.

November 22, 2006
Issuance Date

Anthony Fontana, Chief
Bureau of Solid and Hazardous Waste Permitting – North

November 22, 2011
Expiration Date

3. NJPDES Storm Water Permit

New Jersey Department of Environmental Protection
Bureau of Nonpoint Pollution Control
Division of Water Quality
PO Box 029
Trenton, NJ 08625-0029
Phone: (609) 633-7021
Fax: (609) 984-2147

RENEWAL OF AUTHORIZATION TO DISCHARGE
5G2 -Basic Industrial Stormwater GP - NJ0088315 (5G2)

Facility Name: **PI ID #:** 49126

VEOLIA ES TECHNICAL SOLUTIONS LLC

Facility Address: **NJPDES #:** NJG0065102
1 EDEN LN
FLANDERS, NJ 07836-0818

Annual Recertification Due: Jan - Mar

Type of Activity: Stormwater Discharge General Permit Authorization Renewal
Owner:
VEOLIA ES TECHNICAL SOLUTIONS LLC
1 EDEN LN
FLANDERS, NJ 07836-0818

Operating Entity:
VEOLIA ES TECHNICAL SOLUTIONS LLC
1 EDEN LN
FLANDERS, NJ 07836-0818

Issuance Date:	Effective Date:	Expiration Date:
05/17/2007	06/01/2007	05/31/2012

Your Request for Authorization under NJPDES General Permit No. NJ0088315 has been approved by the New Jersey Department of Environmental Protection.

Ed Frankel

Date: 05/17/2007

Ed Frankel, P.P., Section Chief
Bureau of Nonpoint Pollution Control
Division of Water Quality
New Jersey Department of Environmental Protection

4. DPCC/DCR Plan Approval Letter

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Bureau of Release Prevention
P. O. Box 424
Trenton, N.J. 08625
Tel: (609) 633-0610 Fax: (609) 633-7031

JON S. CORZINE
Governor

LISA P. JACKSON
Commissioner

7002 2410 0002 5961 7749
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

March 19, 2007

John Schantz
ES&H Manager
Veolia Environmental Services
1 Eden Lane
Flanders, NJ 07836

Re: Discharge Prevention, Containment and Countermeasure (DPCC) and Discharge Cleanup and Removal (DCR) Plans **Renewal Approval** for Veolia ES Technical Solutions, Rockaway Twp, Morris County, DIFF# 142700341000

Dear Mr. Schantz:

The Bureau of Release Prevention (bureau) is pleased to inform you of the approval of the DPCC/DCR Plan renewal for Veolia ES Technical Solutions. **You are required to submit a second copy of the DPCC/DCR plan renewal within thirty (30) days of receipt of this letter, as per N.J.A.C. 7:1E-4.9(b).** A copy of the current DPCC/DCR plan shall be readily available on site at all times.

The approved DPCC/DCR plan will be effective for a period of three years from March 16, 2007. Your renewal request must be submitted to the bureau at least 180 days prior to the end of this three-year period.

Your facility will be inspected to verify compliance with the approved DPCC/DCR plan and N.J.A.C. 7:1E *et seq.* If there are to be any changes at the facility which will affect the approved DPCC/DCR plan, then a notification, amendment, or revision must be submitted in accordance with N.J.A.C. 7:1E-4.8.

Approval of the DPCC/DCR plan does not relieve facility personnel from the discharge notification, response and reporting requirements of N.J.A.C. 7:1E-5. If you have a discharge, you must notify the department at (877) WARN DEP (877-927-6337) within fifteen minutes. A written discharge confirmation report is required within 30 days. Exceptions to these reporting requirements are listed in N.J.A.C. 7:1E-5.3(e).

Failure to comply with any aspect of the approved DPCC/DCR plan or of the regulations may result in the assessment of civil administrative penalties and the revocation of this approval.

Should you have any questions regarding your DPCC/DCR plan, please contact Roy Soong at (609) 292-1690.

Respectfully,

Iclal Atay, Ph.D., Manager
Bureau of Release Prevention

c: Beth S. Reddy, Chief, Engineering Review Section
Roy Soong, Senior Environmental Engineer

5. Waste Information Profile (WIP)

Veolia ES Technical Solutions L.L.C.

WASTESTREAM INFORMATION PROFILE

Disposal Code

Recertification

Veolia ES Location NEW JERSEY BRANCH / OFFICE — FLANDERS / CITY — NJ / ST — |001 | 005 |

|__| Invoice Address

Veolia ES TSDF requested ____ Technology requested _____ Generator No. 341500 Generator EPA ID No. NJD980536593

1. Generator Name VEOLIA ES TECHNICAL SOLUTIONS Generator State No. _____
   Address L.L.C. 1 EDEN LANE State Wastestream No. _____
   City FLANDERS State NJ Country US ZIP 07836 ___
   NAICS(SIC) Code 8999 _____ _____ _____ Source G33 Origin 1 Form W801 System Type _____

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2. Waste Name FLAMMABLE AEROSOL PAINT CANS Lab or Waste Area _____
3. Process Generating Waste
   used aerosol cans from drum maintenance
4. Shipping Name WASTE AEROSOLS, FLAMMABLE, n.o.s. _____
   Hazard Class 2.1 UN/NA No. UN1950 PG ___ RQ amt 100 lb Waste: Y PIH: N IH: N DWW: N P: N
RQ Des: 1. _____ 2. _____
DOT Des: 1. DOT-E11396 2. _____
5. Waste Codes D001 _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____
   Wastewater _____ Non Wastewater X Sub Category __ Mix: N Sol: N

---

6. Physical and chemical properties:

pH
- ___ < 2
- ___ 2 - 5
- c X 5 - 9
- d ___ 9 - 12.5
- e ___ > 12.5
- ____ - ____ exact

Specific Gravity
- a ___ <.8
- b X .8 - 1.0
- c ___ 1.0
- d ___ 1.0 - 1.2
- e ___ > 1.2
- ____ - ____ exact

Flash Point(F)
- a ___ < 80
- b X 80 - 100
- c ___ 100 - 140
- d ___ 140 - 200
- e ___ > 200
- f ___ no flash ____ - ____ exact

Solids
- 0 - 0% suspended
- 0 - 0% settleable
- 0 - 0% dissolved
- 60 - 80 % ash
- 0 - 0 % water solubili
- 0 - 0 BTU/lb

Free Liquid Range 0 to 0 %

Physical State
- s X solid
- m ___ semi-solid
- l ___ liquid
- p ___ pumpable semi-solid
- f ___ flowable powder
- g X gas
- a ___ aerosol
- r ___ pressurized liquid
- d ___ debris per 40 CFR 268.45
- h ___ sharps

Hazardous Characteristics
- a ___ air reactive
- w ___ water reactive
- c X cyanide reactive
- f ___ sulfide reactive
- e ___ explosive
- o ___ oxidizing acid
- p ___ peroxide former
- r ___ radioactive or NRC regulated
- s ___ shock sensitive
- t ___ temp sensitive
- m ___ polymerization/monomer
- n ___ OSHA carcinogen
- i ___ infectious
- h ___ inhalation hazard

Zone: _

Odor
- a none X
- b mild ____
- c strong ____

describe _____

Halogens
- Br 0 - 0 % Bromine
- Cl 0 - 0 % Chlorine
- F 0 - 0 % Fluorine
- I 0 - 0 % Iodine

Layers: | a ___ multilayered: b ___ bi-layered: c ___ single phase |

	Top Layer	Second Layer	Bottom Layer	Color
Viscosity by Layer:	___ high(syrup)	___ high(syrup)	___ high(syrup)	VAR
	___ medium(oil)	___ medium(oil)	___ medium(oil)	___
	___ low(water)	___ low(water)	___ low(water)	_____
	___ solid	___ solid	___ solid	

Used oil y/n N HOC < 1000 ppm ___ HOC > 1000 ppm ___

WIP NO. 16149

Chemical Composition [M=Marine Pollutant, S=Severe Marine Pollutant, O=Ozone Depleting Substance, U=Underlying Hazardous Constituent, B=Benzene NESHAP, T=TRI Chemical, C=OSHA Carcinogen]

Constituents		Ranges	Units
	AEROSOL PAINT CANS CONTAINING PROPANE, ISOBUTANE.	100.00 | 100.00	%

Other:

8. Is the wastestream being imported into the USA? Yes __ No X
9. Does the wastestream contain PCBs regulated by 40CFR? Yes __ No X
   PCB Concentration .00 ppm
10. Is the wastestream subject to the Marine Pollutant Regulations? Yes __ No X
11. Is the wastestream subject to Benzene NESHAP? Yes __ No X
    If yes, is the wastestream subject to Notification/Control Requirements? Yes __ No X
    Benzene Concentration .00 ppm
12. Is the wastestream subject to RCRA subpart CC controls? Yes X No __
    Volatile Organic Concentration 100.00 ppmw
    CC Approved Analytical Method? Yes __ No X
    Generator Knowledge? Yes X No __
13. Is the wastestream from a CERCLA or state mandated cleanup? Yes __ No X

14. **Container Information** :

Packaging: _____ Type/Size: __ _____
_____ Type/Size: __ _____

Shipping Frequency: Units 100.00 Per Day _ Per Week _ Per Month _ Per Qtr _ Per Year X One Time _
UOM DRUMS DESCRIPTION: _____

15. **Additional Information** :

GENERATOR CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize sampling of any waste shipment for purposes of recertification.

_____ _____ _____
Name(Print or Type) Phone Date

Signature on File _____
Signature Title

FACILITY NOTIFICATION

If approved for management, Veolia ES has all the necessary permits and licenses for the waste that has been characterized and identified by this profile.

WIP NO. 16149

6. Waste Characterization and Analysis Plan (WAP)

SECTION 3
Waste Analysis Plan
{40 CFR s270.14(b)(3)}

3.1 Waste Analysis Plan (WAP)

The ONYX Waste Analysis Plan (WAP) was developed in accordance with 40 CFR s264.13(b) and will be available at the facility at all times. The WAP will be reviewed regularly to ensure compliance with all regulatory standards and standard operating procedures. The objective of ONYX's WAP is to ensure proper classification, transportation and storage of the specific waste as well as safe handling at both ONYX and the ultimate disposal facility. The WAP is designed to perform all waste identification, sampling and analysis at the generator's site prior to transportation and acceptance by the ONYX facility.

Prior to acceptance at the ONYX facility, all wastes will be assigned an approval code indicating that the waste has been approved for treatment/disposal at the ultimate destination facility. The ONYX WAP is separated into two parts based on the container types commonly encountered at the facility. The container types are: (1) Laboratory Packaged Chemical Wastes (Lab Packs), and (2) Bulk and Non-Bulk Wastestreams.

3.2 Laboratory Packaged Chemicals (Lab Packs)

Lab packs are DOT combination packages holding inside containers of waste chemicals, chemical compounds and samples. Enough absorbent material is placed in each outside container to resist shock and to absorb the liquid contents in the unlikely event of inner container damage during handling, storage and transportation. All lab packs will be packaged or reviewed for quality control by ONYX trained personnel. The majority of the lab pack chemical waste is in the original container with the original manufacturer's label. This information is used to identify and classify the waste for packaging and transportation. If the manufacturer's label is not on the container, ONYX will require that the generator analyze or positively identify the material before it can be removed from the generator's site.

ONYX has developed standard operating procedures for identification or characterization, segregation, packaging, transportation and disposal of lab pack chemicals. These procedures have been developed to provide the generator, transporter and disposal site with the maximum assurance that the waste is packaged to comply with all applicable federal and state regulations and to assure that no chemical compatibility problems occur.

Packaging is completed at the generator's site, in accordance with all USEPA and USDOT regulations as well as ONYX's confidential chemical compatibility segregation grouping system **(Attachment 3)**. In order for two chemicals to be placed in the same outer package, the chemicals must be in the same DOT Hazard Class and the same ONYX chemical compatibility group. This ensures that individual chemical containers packaged in the same outer package are completely compatible. In addition, each lab pack container will be marked and labeled in accordance with all EPA and DOT requirements.

Upon arrival at the facility, ONYX personnel inspect all containers to insure that the packaging has been prepared in accordance with the ONYX chemical compatibility segregation system. Lab Packs holding hazardous wastes may be repacked while in storage at the ONYX facility for one of the following reasons:

1. Corrective action is required.
2. Containers are required to be repackaged due to a change in the ultimate treatment/disposal facility requirements.
3. Inner contents of several lab pack containers of compatible material are to be repacked into larger containers.

3.3 Bulk and Non-Bulk Wastestreams

Initial Review and Waste Identification:

Wastestreams are not accepted at the facility until a Waste Information Profile (WIP) is completed and approved by ONYX technical representatives. Completion of the WIP ensures that the wastes are properly classified, packaged and directed to an approved ultimate disposal facility. The waste analysis process begins with an interview between an ONYX representative and an authorized person at the generator's facility. During the interview, the generator's site, wastes and processes will be reviewed in detail to identify possible waste types and characteristics. Furthermore, the process review will identify all raw materials used in the operations in order to identify all hazardous constituents likely to be present in any generated waste.

Utilizing the information gathered during the interview, the generator is required to complete and certify a WIP for each unique wastestream **(Attachment 2**). ONYX trained personnel may assist the generator in completing the WIP. The generator will use knowledge of the waste, materials and processes used, and analytical results (if necessary) to complete all WIP parameters.

Based on the information provided in the WIP, the wastestream is assigned a DOT proper shipping name, EPA or state waste codes, and an ultimate treatment facility approval code. The WIP is wastestream and generator specific and a unique WIP number is assigned to each wastestream. If the generator cannot accurately complete the WIP, a sample of the waste will be taken at the generator's facility. All sampling and analysis shall be performed in accordance with the Quality Assurance/Quality Control methods established by the Department.

If a sample analysis is required, it will be sent to a commercial laboratory that is certified for the type of analysis to be performed. There will not be any analysis performed by ONYX at the transfer facility. Analytical methods utilized by the laboratory will be in accordance with USEPA guidelines. The results of the analysis are then referenced to properly complete the WIP.

Waste Approval Process:

The WIP, MSDS, if available, and any analytical results are reviewed by the ONYX technical representatives. The review ensures that the waste materials are acceptable under the facility's operating permit. In addition, ultimate treatment/disposal options are determined based on the WIP and land disposal restriction regulations. If an ONYX approval for treatment at an ultimate treatment/disposal facility already exists, the ONYX field service technicians are authorized to transport the wastestream from the generator's facility to the ONYX transfer facility. These existing approvals are referred to as generic disposal approval codes. ONYX maintains as extensive database of generic disposal approval codes to streamline the approval process and allow for the efficient management of customers' wastes.

However, should an approval for treatment at an ultimate treatment/disposal facility not exist, then one will be obtained by ONYX on behalf of the generator. Information from the WIP, along with treatment/disposal facility approval paperwork (and a sample if necessary), will be forwarded to the ultimate treatment/disposal facility for review and approval. Once the approval is issued, an approval code is assigned to that specific wastestream and the waste can be transported from the generator's site to the ONYX transfer facility. The approval code can then be used for future shipments of that same wastestream.

Waste Screening Process

The waste analysis process continues during the preparation of the materials at the generator's site. ONYX trained field personnel will conduct a visual inspection of the wastes, containers, and labels to ensure that the wastes are consistent with the information outlined on the WIP. If any discrepancy exists, the materials will not be removed from the generator's site.

Wastestream Re-evaluation

A re-evaluation of the WIP information and the designated treatment approval for the waste will be conducted under the following circumstances:

1. The generator modifies the process or operation generating the waste.
2. ONYX field operations or the ultimate disposal facility determine that the waste does not conform to the WIP.
3. There is a regulatory revision that affects the classification or appropriate management of the waste for disposal.

All active WIPs will be periodically reviewed for accuracy.

All WIPs and approvals are entered into the ONYX computer database. This allows for easy review of both the WIP and the treatment approval information. In addition, the database maintains an electronic "stamp" that documents the initial date of entry, the date of the last revision, and the username of the person making the modifications to the WIP information.

3.4 Operating Record

A complete written operating record is maintained at the facility as required under 40 CFR s264.73(b). The information is recorded, as it becomes available, and will be maintained until closure of the facility. The operating record includes:

- A description and the quantity of each solid and hazardous waste received, and the method and date of its treatment or disposal.
- The location of each solid and hazardous waste within the facility.
- Records and results of waste analysis and waste determinations.
- Summary reports and details of all incidents that require implementation of the contingency plan.
- Records and results of all required inspections.
- All closure cost estimates.
- Waste minimization plan.

3.5 Reporting Requirements

The following reports are completed as required:

- Manifest Discrepancy Reports – Completed and submitted for significant discrepancies not resolved within fifteen days.
- Unmanifested Waste Reports – Completed and submitted within 15 days for receipt of unmanifested waste.
- Biennial Reports – Completed and submitted covering facility activities during odd numbered calendar years.
- Solid Waste Monthly Reports – Completed and submitted monthly summarizing the solid waste received by the facility.

7. Veolia Authorized Treatment Facilities

Authorized Treatment Facility List

(Partial list of facilities commonly used by the Flanders facility)

Facility	Treatment
AERC – Allentown, PA	Metals Recycling (Batteries/Lamps)
Bethlehem Apparatus Co. – Hellertown, PA	Metals Recycling
Chemical Waste Management – Model City, NY	Landfill
E.I. Dupont – Deepwater, NJ	Wastewater Treatment
Middlesex (Veolia) – Middlesex, NJ	Fuels Blending/ Solvent Recovery
Norlite – Cohoes, NY	Fuels Incineration (Energy Reuse)
Ogden Martin – Lancaster, PA	Incineration (Non-Hazardous)
Veolia Special Services – Stoughton, MA	Metals Recycling (Batteries/Lamps)
Port Arthur (Veolia) – Port Arthur, TX	Incineration (PCB Waste)
SRR (Veolia) – West Carrollton, OH	Fuels Blending/ Solvent Recovery
Stablex Canada – Blainville, Quebec	Landfill
Trade Waste (Veolia) – Sauget, IL	Incineration

8. Veolia Transporter States and Permit Numbers

VEOLIA ENVIRONMENTAL SERVICES

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C. TRANSPORTER PERMITS

12/1/2008

Jurisdiction	Permit Name	Number	Type	Credentials	Markings	Expiration	Lettering
Alabama	Hazardous Waste	NJD080631369	Fleet	Copy of Permit in Cab	None	12/18/2010	NA
Arkansas	DOT	H-986		Copy in Cab		09/11/10	
Arkansas	DEP	PC-1562				.	
Arizona		NJD080631369					
Boston	Fire Department	7026					
Broward County	Hazardous Materials	WT-03-0056	Waste Carrying	Copy of Permit in Cab	Decal	05/31/11	NA
California	Hazardous Materials	117382	Power Units	Copy of License in Cab	CA – 76443 Both Doors	09/30/10	
California	Hazardous Waste	3424	Waste Carrying	Copy of Permit in Cab	None	01/31/010	NA
California	Medical Waste	3424	Fleet			12/31/2010	
California	Motor Carrier Authority	0076443		Copy of permit in Cab			
City of Hazleton			A 19288			01/15/11	
Colorado	Hazardous Materials	HMP-02581	Fleet	Copy of Permit in Cab	None	11/04/10	NA
Connecticut	Hazardous Waste	CT-HW-663	Waste Carrying	Copy of Permit in Cab	Both Sides & Rear “CT-HW-663”	6/30/10	4 inch
Connecticut	Biomedical Waste	CT-BMW-012	Waste Carrying	Copy of Permit In Cab	Both Sides & Rear CT-BMW-012	12/28/11	4 inch
Dade County FL	Liquid Waste Hauler	LW-000001-2008/2009	Motorized	Copy of Permit in Cab	Decal	03/31/10	NA
Delaware	Solid Waste Transporter	DE-SW-463	Vehicle List	Copy of Permit in Cab	On both sides and rear - “DE-SW-463:	12/31/11	3 inch

Jurisdiction	Permit Name	Number	Type	Credentials	Markings	Expiration	Lettering
Delaware	Hazardous Waste	DE-HW-463	Vehicle List	Copy of Permit in Cab	On both sides and rear - "DE-HW-463"	12/31/13	3 inch
Florida	Hazardous Waste	NJD-080631369	Fleet	Copy of Certificate in cab	None	07/01/10	NA
Florida	Mercury Containing Lamps & Devices	NJD080631369				03/01/10	
Florida	Used Oil Transporter	NJD080631369	Fleet	Copy of Certificate in cab	None	06/30/10	
Georgia	Hazardous Materials	11423-11434				02/27/10	
ICC	Motor Carrier Authority	MC295758	Fleet	None	ICC Number	None	NA
Idaho	Hazardous Waste	1001043	Motorized	Permit in Cab	None	03/30/10	NA
Idaho	Hazardous Material	1001043	Motorized	License in Cab	None	12/31/10	NA
IFTA	Fuel Tax – Illinois base	IL36428799801	Motorized	License in Cab	One decal on each Door	12/31/10	NA
Illinois						**Part of the Ohio PUC**	
Illinois ICC	Single State Registration	112609	Motorized >10,000 lb.	Copy of Receipt in Cab	None	N/A	NA
Illinois Commerce Commission	Unified Carrier Registration Receipt	711443	Fleet			12/31/10	
Indiana		NJD080631369					
Iowa		NJD080631369					
Kansas	Hazardous Waste	NJD080631369	Fleet	Copy of Registration in Cab	None	12/31/10	
Kentucky		NJD080631369					
Louisiana		NJD080361369					
Maine	Hazardous Waste	ME-HWT 400 ME-WOT-425	Waste Carrying	License in Cab, Driver Cards	None	12/05/10	NA

VEOLIA
ENVIRONMENTAL SERVICES

Jurisdiction	Permit Name	Number	Type	Credentials	Markings	Expiration	Lettering
Maine Biomedical Waste	Medical Waste	B493	Waste Carrying	License, Driver Cards	Bio Hazardous Symbol	01/19/10	
Maryland	Hazardous Waste	HWH599	Waste Carrying	Copy of Certificate in Cab	Decal Left Door of Cab	12/31/10	NA
Maryland	Special Medical Waste Hauler	SMH 098	Waste Carrying	Copy of Certificate in Cab	Decal Left Door of Cab	12/31/10	
Massachusetts	Hazardous Waste	452	Motorized & Waste Carrying	VID Card in Cab	None	12/31/13	NA
Michigan	Liquid Industrial Waste Uniform Program	LIW 0609181 MI	Waste Carrying	Copy of Registration in Cab		10/16/10	
Mississippi		NJD080631369					
Missouri	Hazardous Waste	H-2146	Motorized	License in Cab	None	12/19/10	NA
Minnesota	Infectious Waste	IW 010	Waste Carrying	Approval letter, confirmation form and spill plan			
Montana		NJD080631369					
Nebraska		NJD080631369					
National Motor Freight Traffic Assoc	Standard Carrier Alpha Code (SCAC)	VEOL	Fleet			06/30/10	
New Hampshire	Hazardous Waste	TNH-0227		Copy of permit In Cab	TNH-0227 on all vehicles used to transport hazardous Waste	06/30/10	

Jurisdiction	Permit Name	Number	Type	Credentials	Markings	Expiration	Lettering
New Jersey	Hazardous Waste	50160	Both Waste Carrying and/or motorized	Cab Card In Cab	Decal	06/30/11	NJDEP 50160 Capacity Decal
New Jersey	Solid Waste	20071	Both Waste Carrying and/or motorized	Cab Card In Cab	Decal	06/30/11	NJDEP 20071 Capacity Decal
New Jersey	Medical Waste Transporter	20071	Cargo Carrying body	Copy of Medical Waste Transporter Notification	Place the registration # (20071) and "Medical Waste or Infectious Waste" 3 " high on both sides and back of cargo carrying body	06/30/10	
New Mexico	Hazardous Material	00000835744				No longer needed	
New Mexico	Tax ID	0835744		Cab Card		12/31/10	
New York	Waste Transporter	NJ-410	Waste Carrying	Copy of Permit	**On both sides & Rear "NJ-410" Co Name on both sides of trailer**	10/31/10	3 inch
New York	Highway Use Tax	Varies	Motorized	Decal & card	Decal	12/31/10	NA
New York City	Fire Department					Varies	
New York City	Dept. of Consumer Affairs	Transfer					
North Carolina		NJD080631369					
North Dakota		WH-586				03/12/2011	
Oklahoma		3883		copy in vehicle		Part of the OHIO PUC	
Oregon	PUC	217942	Motorized	PUC Plate or		None	Legible

Jurisdiction	Permit Name	Number	Type	Credentials	Markings	Expiration	Lettering
				Temporary			
Ohio	PUCO Tax Receipt	07-001332	Motorized	Carry original Receipt	None	07/15/10	N/A
Pennsylvania	Hazardous Waste	PA-AH0500	Fleet	License in Cab	None	11/30/11	NA
Pennsylvania	PUC Authority	A-00112479	Fleet	None	None		NA
Pennsylvania	Infectious & Chemotherapeutic Transporter	PA-HC0221	Fleet	Cab Card	None	10/31/2010	None
Pennsylvania	Turnpike Commission	1571	Fleet	Turnpike Card in Cab	None	**03/31/99 program canceled**	NA
Pennsylvania	Municipal & Residual Waste	WH1990	Waste Hauling / Motorized Unit	Copy of authorization	Decal left front side of truck / 2 decals trailers – left front side & lower left rear/back of trailer	05/31/10	N/A
City of Philadelphia	Philadelphia (city) Waste Collection 3275	313558	Fleet		None	12/31/10	N/A
Rhode Island	Hazardous Waste	RI-748	All Units	Copy of Permit in Cab	Decal Driver's Door / Driver's side of Trailer RI-748 on three sides	06/30/10	2 inch
Rhode Island	Medical Waste	RI-410	Waste Carrying	Copy of Permit in Cab	Decal Driver's Door/ Driver's side of trailer RI-410 on three sides	06/30/10	
South Carolina	Hazardous	NJD080631369	Fleet	Copy of Permit in	None	10/31/2010	NA

Jurisdiction	Permit Name	Number	Type	Credentials	Markings	Expiration	Lettering
	Waste NJD080631369			Cab			
South Carolina Used Oil Reg	Used Oil Registration	UOT – NJD080631369	Fleet	None	None	None	NA
South Dakota		NJD080631369					
Tampa	Solid Waste-recycling	02-002356-PRS				06/26/10	
Tennessee	Hazardous	NJD080631369	Fleet	Copy of Permit in Cab	None	01/31/10	NA
Tennessee	Radioactive	T-NJ011-L01	Fleet	Copy of Permit In cab	None	12/31/10	N/A
Texas	Hazardous Materials	00504177OC	Motorized	Copy of Permit In Cab	None	11/30/10	NA
Texas	TX Notice of Registration	84594	Fleet	None		01/01/18	N/A
USDOT	Motor Carrier ID	609181	Fleet	None	Both Sides – Name, City, St., USDOT #	None	NA
USDOT	RSPA Registration	053006550013O	Fleet	Copy of Registration	None		NA
USEPA	Hazardous Waste	NJD080631369	Fleet	None	None	None	NA
USEPA	TSCA-PCB Transporter	NJD080631369	Fleet	None	None	None	NA
FMCSA	Hazmat Safety	609181-NJ-HMSP	Fleet	Copy of permit in each commercial vehicle	None	01/31/10	N/A
USDOT – Pipeline Haz Materials Admin	Hazardous Materials Certification of Registration	052308 004 014Q	Fleet	Copy of current Certificate of Registration in each truck	None	06/30/10	N/A
Utah	Davis Co. Scavenger & Salvage	Varies Per vehicle	Fleet		Decal on each side of vehicle	12/31/10	N/A

Jurisdiction	Permit Name	Number	Type	Credentials	Markings	Expiration	Lettering
Vermont	Waste Transporter	54013	All Units	Decal, Permit in Cab	Decal on Driver's Side on either cab or trailer	06/30/10	NA
Virginia	Regulated Medical Waste	IWT0000010168	Fleet	Copy of Permit in Cab	None	None	NA
Virginia	Hazardous	NJD080631369	Fleet	Copy of Permit in Cab	None	10/27/15	NA
Washington	Interstate Common Carrier Permit	CC-58568	Fleet	Copy of Permit in Cab	None	None	N/A
Wisconsin	Hazardous Waste	16139	Fleet	Copy of License in Cab	None	09/30/10	NA
Wisconsin	Solid Waste	13800	Motorized	Copy of License in Cab	WDNR 13800	09/30/10	Driver's Door Only
Wisconsin	Infectious Waste	14520	Vehicle list	Copy of License in Cab	WDNR 14520	09/30/10	Driver & Passenger Door
Wisconsin	Receipt of Safe Transport Certificate	998295430		Copy of permit		05/06/10	
Wyoming		NJD080631369					
OH, OK, IL, NV WV, MI, MN	Uniform Program Registration	UPW-0609181-OH	Fleet	Copy – Notice of Filing in Cab	None	01/01/11	

9. Veolia Subcontracted Transporters

Authorized Transporter List

(Partial list of transporters commonly used by the New Jersey Branch)

EPA ID Number	Name	Address	Phone
NJD000692061	Environmental Transport Group Inc.	Goldmine Road Flanders, NJ 07836	973-347-8200
NJD054126164	Freehold Cartage Inc	825 Highway 33 East Freehold, NJ 07728	732-462-1001
NYD980769947	Hazmat Environmental Group Inc	60 Commerce Drive Buffalo, NY 14218	716-827-7200
OHD009865825	Dart Trucking Company Inc.	41738 Esterly Drive Columbiana, OH 44408	800-538-2516
NMD002208627	Rinchem Company Inc.	6133 Edith Blvd. NE Albuquerque, NM 87107	505-345-3655
NJD046555033	Lacy's Express, Inc.	26 East Mill Street Pedricktown, NJ 08067	856-299-2569
NJD071629976	SJ Transportation	1176 US Route 40 PO Box 169 Woodstown, NJ 08098	856-769-2741
PAD064035819	Horwith Trucks, INC.	PO Box 7, Rt. 329 Northampton, PA 18067	610-261-2220

10. Description of Training Classes

VEOLIA
ENVIRONMENTAL SERVICES

Training Catalog

Veolia ES Technical Solutions, LLC

Training and Operational Development

Training and Operational Development (TOD) is responsible for the overall implementation of the Veolia training programs. Veolia provides various types of training for its employees, such as, Employee Orientation, Management/Service Quality and Commitment, and Regulatory/Technical training. The following document will summarize several of the training programs provided to the employees of: Veolia ES Technical Solutions, LLC.

TABLE OF CONTENTS

Initial Training Requirements page 02
ADM00101: General Orientation

New Employee Orientation page 04
SAFT0101: Hazardous Waste Operations and Emergency Response
OPER0101: Fundamentals of Field/Facility Service Operations

Annual Safety Refresher / Safety Modules page 06
SAFT0326: Annual Safety Refresher
SAFT0103: Hazard Communication and Awareness
SAFT0311: Toxicology
SAFT0313: Supplied Air Apparatus
SAFT0312: Selection and Use of Personal Protective Equipment
SAFT0112: Air Contaminant Monitoring
SAFT0310: Radiation/Biohazard Awareness
SAFT0105: First Aid
SAFT0106: CPR
SAFT0314: Fire Safety/Selection and Use of Fire Extinguishers
SAFT0116: Handling Flammable Liquids/Bonding and Grounding
SAFT0111&SAFT0211: Confined Space Awareness/Confined Space Entry
SAFT0115: Cylinder/Pressure Vessel Safety
SAFT0315: Spill Response/Work Zones
OPER0217: Contingency Plan
OPER0220: Contingency Plan Drill for Permitted and In-transit Facilities
SAFT0401: Forklift Operations

Reactive Chemical Training page 09
RCG0506: Reactive Chemical Training
RCG0404: Cylinder Safety

DOT Training page 11
OPER0231: Introduction/General Awareness
OPER0221: Hazardous Materials Classification
OPER0222: Shipping Paper and Emergency Response Information
OPER0223: Marking, Labeling and Packaging Requirements
OPER0225: Placarding Requirements
OPER0226: Loading and Unloading Hazardous Materials
SAFT0309: Hazard Awareness, Assessment and Prevention
OPER0227: DOT Emergency Response

RCRA / Operations Technical Training page 13
OPER0208: Chemical Segregation and Classification
OPER0215: Reportable Quantities
OPER0234: Waste Information Profile
OPER0236: Land Disposal Restriction Form
OPER0246: Hazardous Waste Numbers

Management Training page 14
MGT00404: Train-the-Trainer Program

Service Quality Commitment page 15
Frontline Leadership uest

Initial Training Requirements

ADM00101 - General Orientation

All new employees, regardless of job functions, must receive the following training. Those employees whose jobs do not require them to prepare, transport, or receive hazardous waste will complete their new employee orientation requirements at the end of this two-day program.

1. Safety Program Overview
   - A. Purpose/Importance/Philosophy
   - B. Veolia Safety History
   - C. Ongoing Safety Programs
   - D. Accident Reporting System
   - E. Medical Surveillance Program

2. Safety Systems
   - A. Review and Availability of Standard Operating Procedures
   - B. Purpose and Use of the Site Safety and Health Plan
   - C. Spill Containment and Contingency Plans

3. Hazard Communication and Awareness

4. Fire Safety /Selection and Use of Fire Extinguishers

5. Quality: The Leadership Role

6. Employee Benefits Orientation

This training will be conducted on the first two days of the New Employee Orientation.

New Employee Orientation

All Field Service, Facility Services, Sales and any individual involved in the preparation, transport or receipt of hazardous waste begin their employment with Veolia ES Technical Solutions, LLC by attending the New Employee Orientation. This program is required, regardless of past employment and training history. This program exceeds the 40-Hour training requirements under 29 CFR 1910.120 for routine RCRA activities. The program is essentially divided into two categories: (a) Hazardous Waste Operations and Emergency Response (b) Fundamentals of Field/Facility Service Operations. Trainees are required to demonstrate competency of skills trained during this 80-hour course. Competency is recorded by checklist form in a competency booklet (this booklet is filed in an employees training record with the Corporate Training and Operational Development Department). Upon completion of this program, the employee is given a certificate of completion. This course certifies the employee in OSHA 29 CFR 1910.120, DOT HM-126F, and OSHA 1910.1200. The following outlines the topics covered in this two week New Employee Orientation:

SAFT0101: Hazardous Waste Operations and Emergency Response

I Safety Program Overview
- a. Purpose/Importance/Philosophy
- b. Veolia Safety History
- c. Ongoing Safety History
- d. Accident Reporting System
- e. Medical Surveillance Program

II Safety Systems
- a. Review and Availability of Standard Operating Procedures
- b. Purpose and Use of the Site Safety and Health Plan
- c. Spill Containment and Contingency Plans

III Hazard Communication and Awareness

IV Fire Safety/Selection and Use of Fire Extinguishers

V Toxicology

VI Air Monitoring
- a. MSA Combustible Gas & Oxygen Alarm (Model 261)
- b. Drager Gas Detector Pump
- c. Photoionization Detector

VII Introduction to Reactive Chemicals

VIII Compressed Gas and Cylinder Safety

IX Personal Protective Equipment (PPE)

X Use and Maintenance of the SCBA and Hip-Air

XI Use and Maintenance of Air Purifying Respirator
- a. Fit Test

XII Site Remediation and Emergency Response

XIII Spill Control/Work Zones/Decontamination

XIV Confined Space Entry and Non-Entry Rescue

XV Handling Flammable Liquids/Bonding and Grounding

XVI Field Service/Safety Exercise

XVII Back Safety

XVIII Drum Handling

XIX Chemistry and Compatibility Segregation

OPER0101: Fundamentals of Field/Facility Service Operations

I Introduction

II Overview of On-site Job Completion

III EPA Waste Codes

IV DOT Hazard Classes

V Shipping Names

VI Labeling and Placarding

VII Shipping Paper Requirements

VIII Packaging

IX Paper Work Completion

X Shipping and Receiving Procedures

XI Reportable Quantity Values

XII Land Disposal Restrictions

XIII Program Conclusion

Annual Safety Refresher / Safety Modules

SAFT0326: Annual Safety Refresher

In order to maintain safety awareness and provide required annual refresher training (annual training refers to training conducted at a frequency of once every 12 months), all Facility, Field Services, Sales personnel and any individual involved in the preparation, transport or receipt of hazardous waste are required to participate in the Annual Safety Refresher. Veolia has divided the required annual training into 14 separate modules. Training is either conducted in full-day seminars, one module at a time, or several modules at a time; however, all modules are completed no later than 60 days past the anniversary date of the employee's previous OSHA 1910.120 training. The following provides a summary of each Veolia training module:

SAFT0103: Hazard Communication and Awareness

This course has been specifically designed to alert Veolia employees to the potential hazards in the workplace. It covers the requirements of OSHA's Occupational Noise Exposure Standard (29 CFR 1910.95) and provides a general overview of OSHA's Bloodborne Pathogens Standard (29 CFR 1910.1030). Participants will also learn how to interpret information on labels and Material Safety Data Sheets. Participants are provided with information regarding the DOT hazard classification system and potential non-chemical hazards.

SAFT0311: Toxicology (Hazardous Materials Hygiene/Signs & Symptoms of Chemical Exposure)

This course provides a review of toxicology terms and concepts and reinforces the use of a systematic approach to preventing chemical exposure. Trainees evaluate scenarios, identify the hazards present, determine the chemical risk and proceed to apply appropriate measures to prevent exposure. The types of toxins, toxic effects, host factors and engineering control methods are also examined during this program.

SAFT0313: Supplied Air Apparatus

This course focuses on the inspection and utilization of the SCBA and the Hip-Air units in accordance with the manufacturer's specifications. Proper donning/doffing procedures, emergency operation, back-up systems and SCBA maintenance are all reviewed in this program. To ensure competency, all participants are evaluated on their performance in utilizing the SCBA and Hip-Air units.

SAFT0312: Selection and Use of Personal Protective Equipment

This course has been designed to provide the participants with hands-on practice in the selection and use of personal protective equipment. Participants review and perform donning and doffing procedures for level D, C and B protection. By analyzing job scenarios, trainees will practice problem solving skills as they select appropriate personal protective equipment. Hazard awareness and assessment is highlighted to promote employee safety. Selection of gloves, coveralls and respiratory protection is practiced using various reference material.

SAFT0112: Air Contaminant Monitoring

Hands-on practice and review of air contaminant monitoring equipment is highlighted during this program. Trainees are required to demonstrate competency in the use of the equipment by being evaluated by the instructor. Examples of equipment used in this course are MSA O2/LEL meter, MSA Photoionization Detector, and Drager Detector tubes.

SAFT0310: Radiation/Biohazard Awareness
This two-part course provides an overview of the potential hazards of both radioactive materials and bloodborne pathogens. This program addresses how to recognize potentially hazardous situations involving these materials and how to reduce risk of exposure through the application of control methods. Additional topics include: types of radiation, half-life, radiation detection instruments, dose and types of exposure, Veolia's Exposure Control Plan, epidemiology, signs & symptoms of exposure and Universal Precautions.

SAFT0105: First Aid
A series of videos, demonstrations and hands-on activities are used to prepare participants to respond calmly in emergency situations, make decisions and take appropriate action in order to stabilize injuries until medical assistance arrives. The following first aid topics are examined and practiced by the participants: Emergency Action Principles, secondary survey, bleeding and shock, burns, eye and nose injuries, bites and stings, fractures, dislocations, sprains and strains, poisoning, diabetic emergencies, stroke, seizures, temperature extremes and rescues. This course is given every two years and certification is valid for three years.

SAFT0106: CPR
A series of videos, demonstrations and hands-on activities are used to prepare participants to respond calmly in emergency situations, make decisions and take appropriate action in order to sustain life until medical services arrive. The following life-saving concepts are examined and practiced by the participants: Emergency Action Principles, rescue breathing, choking, heart attack, cardiac arrest and cardiopulmonary resuscitation. This course is given every year and certification is valid for one year.

SAFT0314: Fire Safety/Selection and Use of Fire Extinguishers
The basic principles and procedures of fire safety is discussed during this program. Fires are divided into 4 distinct classes, A through D. Each type of fire is discussed at length as well as the most effective means of extinguishing them. Trainees work together analyzing job scenarios and selecting the proper extinguisher and response procedures for each incident.

SAFT0116: Handling Flammable Liquids/Bonding and Grounding
This course presents the potential hazards associated with handling flammable liquids and the safety procedures utilized to control them. Trainees review the following topics: explosive range, upper and explosive limits, controlling static electricity, and identifying proper grounds. Participants receive hands-on training as they analyze flammable liquid spill scenarios, determine the appropriate bonding and grounding method and simulate the proper procedure.

SAFT0111 & SAFT0211: Confined Space Awareness/Confined Space Entry (Non-entry Rescue)
These courses have been designed to provide the trainees with the technical skills necessary to evaluate, enter, and work in confined spaces according to Veolia procedures. The courses review confined space recognition, personnel responsibilities, permits and emergency egress. Air monitoring, lockout/tagout, explosive atmospheres, ventilation, and hot work procedures are also covered. A confined space is entered and emergency rescues are practiced during this training program. Confined Space Awareness (SAFT 0111) is required for all Facility, Field Services and Sales personnel, and any individual involved in the preparation, transport, or receipt of hazardous waste. The Confined Space Entry (Non-entry Rescue SAFT0211) is required for all Field personnel, and is based on job specifications for Facility and Occasional Field Personnel.

SAFT0115: Cylinder/Pressure Vessel Safety
This course has been designed to provide a comprehensive overview of safe handling procedures for compressed gas containers. Basic maintenance, usage, and storage requirements are discussed. Trainees also review proper movement of gas cylinders, DOT regulations, and Veolia safety procedures.

SAFT0315: Spill Response/Work Zones

This course provides instruction in safe and effective spill response. It illustrates the importance of careful pre-planning and assessment of the potential for incidents. Hands-on instruction is utilized throughout the program. The following topics are highlighted: incident risks, safety, spill control, containment and recovery, work zones and decontamination procedures. Trainees are required to demonstrate competency by participating in a simulated spill response.

OPER0217: Contingency Plan

Veolia's Contingency Plans are comprised of a detailed assessment of potential incidents and a predetermined action scheme that was carefully designed to handle them effectively. This program details all aspects of the contingency plan. The instructor guides the trainees through each portion of the contingency plan. Each facility's plan is designed to reflect its unique operations and permit. The following topics are covered: emergency coordination/contact list, duties and responsibilities, reporting sequence and requirements, emergency actions, disposal of clean-up materials, documentation, emergency response procedures, amendment procedures and emergency equipment.

OPER0220: Contingency Plan Drill for Permitted and In-transit Facilities

This drill affords the participants the opportunity to practice Veolia's Contingency Plan procedures and techniques of spill control. A "mock" spill clean-up is conducted in the facility and all personnel must respond according to their assignments as outlined in the contingency plan. Individuals may be required to either evacuate the premises or participate in the "hands-on" clean-up. The drill is taped and then critiqued by the instructor and the participants.

SAFT0401: Forklift Operations

This program is designed to meet the operator training requirements for industrial forklift trucks under OSHA 29 CFR 1910.178, which states that "only trained and authorized operators shall be permitted to operate a powered industrial truck." The program is divided into two sections: classroom instruction and practice driving. Each individual will have to demonstrate competency by operating the forklift truck for the instructor and also by passing a written test.

Reactive Chemical Training

RCG#0506: Reactive Chemical Training

The Reactive Chemical Training program is designed for Field Service employees who are expected to work on Routine Reactive Chemical projects and who also participate in Special Handling Reactive projects. This program includes identification of reactive chemicals, reactive terminology, and safe handling of routine reactive chemicals. Trainees are required to demonstrate competency to the instructors by participating in job simulations. An outline of the topics covered in this program is listed below:

Reactive Chemical Training

- *I Introduction to Reactive Chemicals*
  - *a. Course Objectives and Overview*
  - *b. Reference Materials*
    - *b.1 Veolia ES Technical Solutions, LLC Chemical Text*
    - *b.2 Reactives Chemical Procedure Book*
    - *b.3 Bretherick's Handbook of Reactive Chemicals*
    - *b.4 MSDS*
- *II Reactive Terminology*
  - *a. Air Reactive*
  - *b. Water Reactive*
  - *c. Oxidizing Liquids*
- *III Routine Reactive Chemicals*
  - *a. Routine Reactive Identification/Handling*
  - *b. Routine Reactive Packaging*
- *IV Conditional and Special Handling*
  - *a. Determination/Identification*
  - *b. Billing codes*
- *V Remote Opening Equipment*
  - *a. Set-up and Operation*
  - *b. Handling*
  - *c. Special Projects*
- *VI Site Safety Plan Development*
- *VII Monomers*
  - *a. Chemistry of Monomers*
  - *b. Hazards and Reactions of Monomers*
  - *c. Storage Conditions*
  - *d. Exercise 1: Stabilization of Monomers*
- *VIII Peroxide Formers*
  - *a. Peroxide Formation Chemistry*
  - *b. Shelf life/Storage Condition*
  - *c. Stabilization/Solvents*
  - *d. Exercise: Identification of Peroxide Formers*

IX Explosives
- *a. Types of Explosions*
- *b. Effects of Explosions*
- *c. Contamination*
- *d. Solvents/Stabilization*
- *e. Incompatible Mixtures*

X Temperature Sensitive Materials
- *a. Definitions*
- *b. Phases of Temperature Sensitive Materials*
- *c. Temperature Sensitive Material Identification*
- *d. Packaging and Paperwork*

RCG00404: Cylinder Training

I Cylinder Removal General Safety
- *a. Hazardous Characteristics*
- *b. Cylinder Features*
- *c. Storage of Cylinders*
- *d. Transportation*
- *e. Movement by Hand*
- *f. Unknown Cylinder*
- *g. Empty Cylinder Disposal*

II Cylinder Removal Project QC

A. Visual Inspection of Cylinder
- *a. Size of Cylinder*
- *b. Type of Cylinder*
- *c. Valve Type*
- *d. CGA Fitting*
- *e. Physical Appearance*

B. Known Off-Site Disposal Options

III Cylinder Removal Handling Procedures
- *a. Cylinder Pressure Testing and/or Unknown Cylinders Sampling*
- *b. Direct Transfer of Liquids from Cylinders*
- *c. Cylinder Transfers (gas phase) into Solvents*

D.O.T.

D.O.T.

The Hazardous Materials Regulations (49 CFR, Subtitle B, Chapter 1, Subchapter C, Parts 171 through 180) was originally developed to address the acute hazards associated with the transportation of explosives and flammables. These regulations have evolved to include: classification, hazard communication, transportation, emergency planning/response, and packaging. Docket HM-126F is an amendment to the communication requirements that mandate specific training requirements for persons involved in the transportation of hazardous materials. The docket states that all hazmat employees receive this training. A HAZMAT EMPLOYEE includes those who during the course of their employment:

- load, unload, or handle hazardous materials
- test, recondition, repair, modify, mark, or otherwise represents containers, drums, or packaging used for the transporting of hazardous materials
- prepare hazardous materials for transportation
- are responsible for the safety of transporting hazardous materials
- operate a vehicle carrying hazardous materials

In order to meet the training requirements, four categories of training must be covered: General Awareness/Familiarization Training, Function Specific Training, Safety Training and Driver Training. Training for employees must be conducted within 90 days of employment start date. Training is conducted on a biennial basis, and is divided into 8 different modules. The following summarizes the different modules covered in this program:

OPER0231: Introduction/General Awareness - Module 1

This introductory module is designed to provide the participants with an explanation of the purpose of the DOT Hazardous Materials Requirements, summary of the training requirements and knowledge needed to identify the hazardous materials in their workplace.

OPER0221: Hazardous Materials Classification - Module 2

Upon completion of this program, the hazmat employee will be able to use the 8 columns of the Hazardous Materials Table to determine the proper identification and classification of a variety of hazardous materials. Each participant will be required to maintain at least 80% accuracy on a written quiz that will test for competency on hazardous materials classification.

OPER0222: Shipping Paper and Emergency Response Information - Module 3

This module is designed to provide participants with the information necessary to complete shipping papers according to the hazard communication requirements. Participants will also be provided with the reference materials that are needed to properly complete shipping papers.

OPER0223: Marking, Labeling and Packaging Requirements - Module 4

This module is designed to educate employees on the procedures to properly mark and label shipping containers as well as interpret packaging specifications, markings and provisions to the hazard communications and packaging requirements. Participants are required to maintain at least 80% accuracy on a written quiz that will test for competency on marking, labeling, and packaging.

OPER0225: Placarding Requirements - Module 5

The purpose of this module is to provide participants with the information needed to properly placard a transport vehicle. Upon completion of this program, participants will be able to interpret placarding requirements listed on Table 1 and Table 2 in 49 CFR 172.504 and also select proper placards for a transport vehicle when given the weight totals and hazard classes for mixed loads. Participants are required to maintain at least 80% accuracy on a written quiz that will test for competency on placarding.

OPER0226: Loading and Unloading Hazardous Materials - Module 6

This module is designed to educate participants on the proper procedures to load, segregate materials, and unload a transport vehicle according to 49 CFR Part 177 Subparts B & C. Upon completion of this module, the participant will be able list shipper and carrier responsibilities, explain loading requirements and restrictions when given a hazard class, and list transportation and storage restrictions for a given list of chemicals and chemical mixtures. Participants are required to maintain at least 80% accuracy on a written quiz that will test for competency on loading and unloading hazardous materials.

Hazard Awareness, Assessment and Prevention - Module 7

This module is designed to provide participants with the information on how to recognize and evaluate the potential hazards in their workplace. Routes of chemical exposure, Material Safety Data Sheet interpretation, and hazard control are covered in this program. Participants are required to maintain at least 80% accuracy on a written quiz that will test for competency on hazard awareness, assessment and prevention.

OPER0227: DOT Emergency Response - Module 8

This module is intended to address those employees who have limited responsibilities in the event of an emergency, such as notifying others or minimizing the effects of an unintentional release of hazardous materials. It is not intended to satisfy the training needs and requirements for hazmat employees whose *primary* responsibilities involve emergency response. Upon completion of this module, the participant will be able to list the Veolia plan for responding to emergencies at their facility, state the 4 primary responsibilities of an emergency responder, and list the information that must be communicated when reporting a spill or release. All participants must demonstrate competency to the instructor by evaluating a spill response situation and determine the response procedures when given a spill response scenario and also by satisfactorily completing competency review sheets on responding to and reporting a spill.

RCRA / Operations Technical Training

OPER0208: Chemical Segregation and Classification
This module is designed to provide the participants with the basic skills to segregate pack lab quantities of chemical's into the Veolia compatibility groups. These compatibility groups prevent the commingling of incompatible chemicals during transportation.

OPER0215: Reportable Quantities - DOT RQ Determination
This module is designed to provide the trainee with the knowledge to be able to evaluate reportable quantities and to determine appropriate shipping names for transportation.

OPER0234: Waste Information Profile
This module is designed to provide the trainee with the knowledge to complete an Veolia Waste Information Profile in order to track a customer's wastestream.

OPER0236: Land Disposal Restriction Form (LDR)
This module provides the trainee with the knowledge to determine whether a substance should be classified as a wastewater or non-wastewater and how to complete the appropriate land disposal restriction forms.

OPER0246: Hazardous Waste Numbers
This module is designed to provide the participants with the basic skills to properly identify and classify hazardous waste streams. The trainee will be/able to assign EPA hazardous waste numbers to the wastestreams.

Management Training

MGT#00404: Train-the-Trainer Program
The Train-the-Trainer program is designed for anyone who conducts any kind of training, or who gives presentations in which a new subject is introduced. During the program, participants will accomplish the following objectives: a) demonstrate the training skills necessary to effectively and confidently deliver training modules, b) develop a basic training module in a systematic manner. In addition to these objectives, the following topics will be included in the program, needs analysis, task analysis, learning objectives, testing techniques, instructional strategies, delivery of instruction, and handling aggressive behaviors. During the program, each participant in the program will be required to design and deliver a training module on a work-related topic of their choice.

Service Quality Commitment

Veolia ES Technical Solutions, LLC focuses their efforts each and everyday on Service, Quality and Commitment. Every employee will be trained and committed to continuous improvement. The customer will determine the quality of our service, not just by reliability of our basic service, but from the "total experience" of doing business with Veolia.

The training process for the SQC program is skills driven. The SQC Tactical Plan addresses deployment of coaching, personal and team skills for each employee of the company. This enables the employees to obtain the knowledge, skills and abilities necessary to continuously improve work processes. Training is implemented from the "top down", with improvements developed from the "bottom up". All training includes a skills practice during the sessions and on-the-job applications. The SQC training program consists of six category groupings: Frontline Leadership, Quest, Team Effectiveness, Team Leadership, Leadership 2000 and Facilitation. A brief description of all available SQC modules follows.

Frontline Leadership

SQC10010: Giving Constructive Feedback
This unit builds skill in delivering objective, honest feedback in a coherent fashion that will make the feedback relevant and useful to employees.

SQC10030: Getting Good Information From Others
Discusses the values of good information in making better decisions. This program focuses on the skills and knowledge necessary for gathering in-depth information efficiently.

SQC10031: Getting Your Ideas Across
This unit provides skills that are particularly helpful for explaining tough decisions or complicated, possibly unpopular, ideas.

SQC10032: Dealing With Emotional Behavior
Focuses on the ways to defuse non-constructive emotional behavior in work situations and how to refocus energies toward positive, productive solutions to issues.

SQC10014: Recognizing Positive Results
By incorporating the motivating element of personal appreciation for a job well done, this course focuses on building skills beyond giving basic feedback.

SQC10025: Establishing Performance Expectations
Offers a method for clearly focusing employees on the right targets, so they can get motivated, keep goals in view, and make better decisions.

SQC10026: Developing Job Skills
This unit demonstrates how to train employees in technical, mechanical, and/or interpersonal skills and how to help them grow personally and professionally.

SQC10027: Coaching for Optimal Performance
This course shows how to help employees examine their own performance. It provides suggestions for generating employee commitment to improved results and mutually planning and carrying out ways to work smarter. This course also covers performance appraisal discussions.

SQC10028: Taking Corrective Action
This unit gives tips for taking prompt action to correct unproductive behavior and for replacing punitive measures with a high-priority action plan for getting back on track.

SQC10033: Clarifying Team Roles and Responsibilities
This unit demonstrates how to tap the expertise of all team members, thus gaining output from a collaborative effort. This process is appropriate for both ongoing and temporary work efforts.

SQC10052: Conducting Information Exchange Meetings
This unit gives suggestions for moving meetings along quickly while fostering understanding and delivering positive post-meeting results.

SQC10034: Resolving Team Conflicts
This unit demonstrates how to handle conflicts between individuals in group situations, and it gives tools for rebuilding relationships between team members.

SQC10053: Building A Constructive Relationship with Your Manager
This unit demonstrates how to build a relationship that enables both supervisors and their managers to achieve their goals. It helps to build skills for identifying and planning ways to work together more effectively.

SQC10054: Building A Collaborative Relationship With Your Peers
This unit provides the planning and action steps that help participants to take the initiative to coordinate with one another effectively in order to reach the goals of the organization as well as their own.

SQC10051: Confronting Issues with Your Manager and Peers
This unit offers a "win-win" approach to conflict resolution by demonstrating how to "clean the air" before serious problems affect progress and results.

SQC10055: Winning Support From Others
This unit demonstrates how to extend personal influence through good listening, mutual understanding and mutual benefits. It demonstrates how to build and maintain supportive relationships that produce results.

SQC10023: Managing Change
This unit demonstrates how to help employees take on the responsibility for implementing successful change and how to turn potentially threatening situations into opportunities to effect change.

SQC10024: Fostering Improvement Through Innovation
This course shows how to generate creativity and minimize risk by drawing out ideas from those closest to the work. Covers how to channel energy into creative approaches in important objectives.

11. 5-Year OSHA Summary

Veolia ES Technical Solutions
1 EDEN LANE
FLANDERS, NEW JERSEY 07836

FLANDERS NEW JERSEY BRANCH
OSHA 300 Log Summary
2004-2009

SIC Code – 4953 **NAICS Code – 562211**	**2004**	**2005**	**2006**	**2007**	**2008**	**2009**
Fatalities	0	0	0	0	0	0
Restricted and Lost Workday Cases	2	1	3	6	2	1
Lost Workday Cases	0	0	1	2	1	0
Medical Attention Only Cases (First Aid Only)	3	6	5	3	2	4
OSHA Recordable Cases	2	2	5	7	2	1
Employee Hours	190,000	210,000	233,000	225,000	300,000	231,000
Recordable Injury Case Rate	2.10	1.91	4.29	6.22	1.33	0.87
Lost-time Injury Case Rate	0.00	0.00	0.86	1.78	0.67	0.00
Number of Lost Workdays	0	0	12	14	2	0
Severity Rate	0.00	0.00	10.30	12.44	1.33	0.00
EMR Rate	0.45	0.46	0.50	0.57	0.62	0.81

12. 5-Year Compliance History

Veolia ES Technical Solutions
Flanders, New Jersey Facility
(NJD 980 536 593)
Compliance History
(2005 – Present)

Location	Date	Description	Penalty
Flanders, NJ TSDF	11/28/05	Failure to identify PCBs on three outbound manifests shipped in 2003	$2100 + SEP
Flanders, NJ TSDF	7/2/07	NJDEP NOV for failure to properly complete the manifest	$3,750 Settled
Flanders, NJ TSDF	3/6/09	NJDEP NOV for failure update the DPCC/DCR plans with new employee contacts.	None
Flanders, NJ TSDF	8/4/09	NJDEP NOV for improper segregation of waste containers in storage at the facility	$3,600
Flanders, NJ TSDF	12/9/09	Failure to identify PCBs on three outbound manifests shipped in 2009	$19,720

Note: There is a separate compliance history for the Veolia Environmental Services transportation unit (NJD 080 631 369), which is registered under the same address as the Veolia Flanders Facility.

Agency Contacts:

Agency	Contact	Phone Number
NJDEP - Waste	Paula Tagliaferri	973-646-4470
NJDEP – DPCC	Gary Sobin	609-984-7573
NJDEP – Transportation	Robert Harkins	609-273-3734
EPA – Region II	John Wilk	212-637-4130
EPA – TSCA	Vivian Chin	732-906-6179
Mt. Olive Fire/LEPC	Fred Detoro	973-961-0900
NJDEP – Storm Water	Christopher Brindle	973-656-4099

13. Veolia Insurance Coverage Summary

A Summary of Property, Liability, and Casualty Insurance Protection for Veolia and its Subsidiaries
2009 - 2010 Policy Period

We know that a company's philosophy relating to managing unforeseen risks potentially possible in an operation such as the environmental industry can be quite indicative of the caliber and capabilities of the firm that manages them. That is certainly the case with Veolia Environmental Services. Veolia remains diligent in understanding the risks inherent to our line of work and we properly address them in the form of risk management, insurance training, and education of our internal staffs, partnering with experienced brokers in the environmental insurance arena, and selecting insurers who are both financially sound and offer comprehensive protection programs.

Workers Compensation/Employers Liability

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

Commercial Motor Vehicle Liability

Providing limits of a $5,000,000 combined single limit, this policy protects Veolia Environmental Services 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 Veolia Environmental Services facilities, premises, operations, and products. A primary limit of liability of $5,000,000 per occurrence/$5,000,000 aggregate is provided, and can be further supplemented by Excess/Umbrella coverage.

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 $50,000,000 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 at Veolia's fixed facilities.

Contractors Operations & Professional Services (COPS)

The COPS program meets the needs of the “hands-on” operations and professional services contracting arm of Veolia. 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 $25,000,000 each occurrence/total all claims.

Umbrella Liability (Excess Liability)

This policy substantially extends the limits of the primary General Liability, Motor Vehicle Liability, and Employers Liability to $50,000,000 per occurence/$50,000,000 aggregate. 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

Our property program provides Veolia with over $380,000,000 of all risk property coverage. The program contains boiler and machinery, business interruption, and earthquake/flood coverages.

Veolia continues to dedicate significant resources to the proper implementation and administration of its high quality insurance program. Where applicable and within the parameters of the insurance contracts, coverage can be extended to Veolia Environmental Services customers as may be required by various contracts. Veolia has established a record of providing exemplary insurance coverage and risk management practices, which offer the comfort of stable and long-term relationships with its clients, customers and vendors.

*****

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY): 06/26/2009

PRODUCER
Marsh USA Inc.
1000 Main Street, Suite 3000
Houston, TX 77002
Attn: Specialty.CertRequest@marsh.com; 212-948-0564

010056-Veoli-COP/-09/10 $5M No ....

THIS CERTIFICATION IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

INSURED
VEOLIA ES TECHNICAL SOLUTIONS, LLC
1 EDEN LANE
FLANDERS, NJ 07836

INSURERS AFFORDING COVERAGE	NAIC #
INSURER A: New Hampshire Insurance Company	23841
INSURER B: Insurance Company Of The State Of PA	19429
INSURER C: AIG Casualty Company	19402
INSURER D: National Union Fire Insurance Co	19445
INSURER E: N/A	N/A

COVERAGES 4

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. AGGREGATE LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	ADD'L INSRD	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YYYY)	POLICY EXPIRATION DATE (MM/DD/YYYY)	LIMITS	
A		GENERAL LIABILITY X COMMERCIAL GENERAL LIABILITY CLAIMS MADE X OCCUR X CONTRACTUAL LIABILITY-RR GENERAL AGGREGATE LIMIT APPLIES PER: X POLICY PRO-JECT LOC	GL4572700	07/01/2009	07/01/2010	EACH OCCURRENCE DAMAGE TO RENTED PREMISES(Ea occurrence) MED EXP (Any one person) PERSONAL & ADV INJURY GENERAL AGGREGATE PRODUCTS - COMP/OP AGG	$ 5,000,000 $ 1,000,000 $ 10,000 $ 5,000,000 $ 5,000,000 $ 5,000,000
B B B		AUTOMOBILE LIABILITY X ANY AUTO ALL OWNED AUTOS SCHEDULED AUTOS HIRED AUTOS NON-OWNED AUTOS	CA4576281 (All Other States) CA4576282 (MA) CA4576283 (VA)	07/01/2009 07/01/2009 07/01/2009	07/01/2010 07/01/2010 07/01/2010	COMBINED SINGLE LIMIT (Ea accident) BODILY INJURY (Per person) BODILY INJURY (Per accident) PROPERTY DAMAGE (Per accident)	$ 1,000,000 $ $ $
		GARAGE LIABILITY ANY AUTO				AUTO ONLY - EA ACCIDENT OTHER THAN AUTO ONLY: EA ACC AGG	$ $ $
		EXCESS / UMBRELLA LIABILITY OCCUR CLAIMS MADE DEDUCTIBLE RETENTION $				EACH OCCURRENCE AGGREGATE	$ $
A C D F		WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? Y / N N (Mandatory in NH) If yes, describe under SPECIAL PROVISIONS below	WC4552998 (All Other States) WC4552999 (AZ, MD & VA) WC4553000 (CA) WC4553001 (WI & STOP GAP)	07/01/2009 07/01/2009 07/01/2009 07/01/2009	07/01/2010 07/01/2010 07/01/2010 07/01/2010	X WC STATU-TORY LIMITS OTH-ER E.L. EACH ACCIDENT E.L. DISEASE - EA EMPLOYEE E.L. DISEASE - POLICY LIMIT	$ 1,000,000 $ 1,000,000 $ 1,000,000
		OTHER					

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/EXCLUSIONS ADDED BY ENDORSEMENT/SPECIAL PROVISIONS
EVIDENCE OF INSURANCE

CERTIFICATE HOLDER HOU-001193381-09

VEOLIA ES TECHNICAL SOLUTIONS, LLC
1 EDEN LANE
FLANDERS, NJ 07836

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING INSURER WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO DO SO SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE INSURER, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE of Marsh USA Inc.
Barry N. Smith

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IMPORTANT

If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

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).

DISCLAIMER

This Certificate of Insurance does not constitute a contract between the issuing insurer(s), authorized representative or producer, and the certificate holder, nor does it affirmatively or negatively amend, extend or alter the coverage afforded by the policies listed thereon.

ADDITIONAL INFORMATION

HOU-001193381-09

DATE (MM/DD/YY)
06/26/2009

PRODUCER

Marsh USA Inc.
1000 Main Street, Suite 3000
Houston, TX 77002
Attn: Specialty.CertRequest@marsh.com; 212-948-0564

010056-Veoli-COP/-09/10 $5M No ....

INSURERS AFFORDING COVERAGE	NAIC #
INSURER F: Commerce And Industry Ins Co	19410
INSURER G: N/A	N/A
INSURER H: N/A	N/A
INSURER I:	

INSURED

VEOLIA ES TECHNICAL SOLUTIONS, LLC
1 EDEN LANE
FLANDERS, NJ 07836

TEXT

WORKER'S COMPENSATION: CARRIER:	POLICY NUMBER:	POLICY TERM:
INSURANCE CO. OF THE STATE OF PA LIMITS: EL EACH ACCIDENT: $1,000,000	WC 1558356 (FL) EL DISEASE-POLICY LIMIT: $1,000,000	7/1/09 - 7/1/10 EL DISEASE-EACH EMPLOYEE: $1,000,000.
INSURANCE CO. OF THE STATE OF PA LIMITS: EL EACH ACCIDENT: $1,000,000	WC 0623124 (MA) EL DISEASE-POLICY LIMIT: $1,000,000	7/1/09 - 7/1/10 EL DISEASE-EACH EMPLOYEE: $1,000,000.
ILLINOIS NATIONAL INSURANCE CO. LIMITS: EL EACH ACCIDENT: $1,000,000	WC4883561 (TX) EL DISEASE-POLICY LIMIT: $1,000,000	7/1/09 - 7/1/10 EL DISEASE-EACH EMPLOYEE: $1,000,000.

CERTIFICATE HOLDER

VEOLIA ES TECHNICAL SOLUTIONS, LLC
1 EDEN LANE
FLANDERS, NJ 07836

AUTHORIZED REPRESENTATIVE
of Marsh USA Inc.
Barry N. Smith

ENDORSEMENT FOR
MOTOR CARRIER POLICIES OF INSURANCE FOR PUBLIC LIABILITY
UNDER SECTIONS 29 AND 30 OF THE MOTOR CARRIER ACT OF 1980

Form Approved
OMB No. 2125-0074

Issued to **VEOLIA ES TECHNICAL SOLUTIONS, LLC,** of **1 EDEN LANE – FLANDERS, NJ 07836**

Dated at **HOUSTON, TX 77019-2128** this **1ST** day of **JULY, 2009**

Amending Policy No. **CA 457 62 81** Effective Date **07/01/2009**

Name of Insurance Company **INSURANCE COMPANY OF THE STATE OF PENNSYLVANIA**

Telephone Number **(713) 342-7300** Countersigned by _____

The policy to which this endorsement is attached provides primary or excess insurance, as indicated by "☒", for the limits shown:

☒ This insurance is primary and the company shall not be liable for amounts in excess of $ **5,000,000** for each accident.
☐ This insurance is excess and the company shall not be liable for amounts in excess of $ _____ for each accident in excess of the underlying limit of $ _____ for each accident.

Whenever required by the Federal Highway Administration (FHWA) or the Interstate Commerce Commission (ICC), the company agrees to furnish the FHWA or the ICC a duplicate of said policy and all its endorsements. The company also agrees, upon telephone request by an authorized representative of the FHWA or the ICC, to verify that the policy is in force as of a particular date.

Cancellation of this endorsement may be effected by the company or the insured by giving (1) thirty-five (35) days notice in writing to the other party (said 35 days notice to commence from the date the notice is mailed, proof of mailing shall be sufficient proof of notice), and (2) if the insured is subject to the ICC's jurisdiction, by providing thirty (30) days notice to the ICC (said 30 days notice to commence from the date the notice is received by the ICC at its office in Washington, D.C.).

DEFINITIONS AS USED IN THIS ENDORSEMENT

ACCIDENT includes continuous or repeated exposure to conditions which result in bodily injury, property damage, or environmental damage which the insured neither expected nor intended.

MOTOR VEHICLE means a land vehicle, machine, truck, tractor, trailer, or semitrailer propelled or drawn by mechanical power and used on a highway for transporting property, or any combination thereof.

BODILY INJURY means injury to the body, sickness, or disease to any person, including death resulting from any of these.

ENVIRONMENTAL RESTORATION means restitution for the loss, damage, or destruction of natural resources arising out of the accidental discharge, dispersal, release or escape into or upon the land, atmosphere, watercourse, or body of water, of any commodity transported by a motor carrier. This shall include the cost of removal and the cost of necessary measures taken to minimize or mitigate damage to human health, the natural environment, fish, shellfish, and wildlife.

PROPERTY DAMAGE means damage to or loss of use of tangible property.

PUBLIC LIABILITY means liability for bodily injury, property damage, and environmental restoration.

The insurance policy to which this endorsement is attached provides automobile liability insurance and is amended to assure compliance by the insured, within the limits stated herein, as a motor carrier of property, with Sections 29 and 30 of the Motor Carrier Act of 1980 and the rules and regulations of the Federal Highway Administration (FHWA) and the Interstate Commerce Commission (ICC).

In consideration of the premium stated in the policy to which this endorsement is attached, the insurer (the company) agrees to pay, within the limits of liability described herein, any final judgment recovered against the insured for public liability resulting from negligence in the operation, maintenance or use of motor vehicles subject to the financial responsibility requirements of Sections 29 and 30 of the Motor Carrier Act of 1980 regardless of whether or not each motor vehicle is specifically described in the policy and whether or not such negligence occurs on any route or in any territory authorized to be served by the insured or elsewhere. Such insurance as is afforded, for public liability, does not apply to injury to or death of the insured's employees while engaged in the course of their employment, or property transported by the insured, designated as cargo. It is understood and agreed that no condition, provision, stipulation, or limitation contained in the policy, this endorsement, or any other endorsement thereon, or violation thereof, shall relieve the company from liability or from the payment of any final judgment, within the limits of liability herein described, irrespective of the financial condition, insolvency or bankruptcy of the insured. However, all

terms, conditions and limitations in the policy to which the endorsement is attached shall remain in full force and effect as binding between the insured and the company. The insured agrees to reimburse the company for any payment made by the company on account of any accident, claim, or suit involving a breach of the terms of the policy, and for any payment that the company would not have been obligated to make under the provisions of the policy except for the agreement contained in this endorsement.

It is further understood and agreed that, upon failure of the company to pay any final judgment recovered against the insured as provided herein, the judgment creditor may maintain an action in any court of competent jurisdiction against the company to compel such payment.

The limits of the company's liability for the amounts prescribed in this endorsement apply separately, to each accident, and any payment under the policy because of any one accident shall not operate to reduce the liability of the company for the payment of final judgments resulting from any other accident.

The Motor Carrier Act of 1980 requires limits of financial responsibility according to the type of carriage and commodity transported by the motor carrier. It is the MOTOR CARRIER'S obligation to obtain the required limits of financial responsibility. THE SCHEDULE OF LIMITS SHOWN DOES NOT PROVIDE COVERAGE. The limits shown in the schedule are for information purposes only.

SCHEDULE OF LIMITS
Public Liability

Type of Carriage	Commodity Transported	Minimum Insurance
(1) For-hire (In interstate or foreign commerce).	Property (nonhazardous).	$ 750,000
(2) For-hire and Private (In interstate, foreign, or intrastate commerce).	Hazardous substances, as defined in 49 CFR 171.8, transported in cargo tanks, portable tanks, or hopper-type vehicles with capacities in excess of 3,500 water gallons; or in bulk Divisions 1.1, 1.2, and 1.3 materials; any quantity of Division 2.3 Hazard Zone A or Division 6.1, Packing Group 1, Hazard Zone A material; in bulk Division 2.1 or 2.2; or highway route controlled quantities of a Class 7 material as defined in 49 CFR 173.403.	$ 5,000,000
(3) For-hire and Private (In interstate or foreign commerce: in any quantity) or (In intrastate commerce: in bulk only).	Oil listed in 49 CFR 172.101, hazardous materials and hazardous substances defined in 49 CFR 171.8 and listed in 49 CFR 172.101, but not mentioned in (2) above or (4) below.	1,000,000
(4) For-hire and Private (In interstate or foreign commerce).	Any quantity of Division 1.1, 1.2 or 1.3 material; any quantity of a Division 2.3, Hazard Zone A, or Division 6.1, Packing Group 1, Hazard Zone A material; or highway route controlled quantities of Class 7 material as defined in 49 CFR 173.403.	5,000,000

Note: The type of carriage listed under (1), (2), and (3) applies to vehicles with a gross vehicle weight rating of 10,000 pounds or more. The type of carriage listed under number (4) applies to all vehicles with a gross vehicle weight rating of less than 10,000 pounds.

SCHEDULE OF LIMITS
Public Liability

For-hire motor carriers of passengers operating in interstate or foreign commerce

Vehicle Seating Capacity	Minimum Insurance
(1) Any vehicle with a seating capacity of 16 passengers or more.	$ 5,000,000
(2) Any vehicle with a seating capacity of 15 passengers or less	1,500,000

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY) 07/14/2009

PRODUCER
Aon Risk Services Central, Inc.
Chicago IL Office
200 East Randolph
Chicago IL 60601 USA

PHONE - (866) 283-7122 FAX - (847) 953-5390

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

INSURERS AFFORDING COVERAGE		NAIC #
INSURER A:	Lexington Insurance Company	19437
INSURER B:	National Union Fire Ins Co of Pittsburgh	19445
INSURER C:		
INSURER D:		
INSURER E:		

INSURED
Veolia ES Technical Solutions, LLC
One Eden Lane
Flanders NJ 07836 USA

Holder Identifier :

Certificate No : 570035480788

COVERAGES

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. AGGREGATE LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

LIMITS SHOWN ARE AS REQUESTED

INSR LTR	ADD'L INSRD	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE(MM/DD/YYYY)	POLICY EXPIRATION DATE(MM/DD/YYYY)	LIMITS	
		GENERAL LIABILITY				EACH OCCURRENCE	
		☐ COMMERCIAL GENERAL LIABILITY				DAMAGE TO RENTED PREMISES (Ea occurrence)	
		☐ CLAIMS MADE ☐ OCCUR				MED EXP (Any one person)	
						PERSONAL & ADV INJURY	
		GEN'L AGGREGATE LIMIT APPLIES PER:				GENERAL AGGREGATE	
		☐ POLICY ☐ PRO-JECT ☐ LOC				PRODUCTS - COMP/OP AGG	
		AUTOMOBILE LIABILITY				COMBINED SINGLE LIMIT (Ea accident)	
		☐ ANY AUTO				BODILY INJURY (Per person)	
		☐ ALL OWNED AUTOS				BODILY INJURY (Per accident)	
		☐ SCHEDULED AUTOS				PROPERTY DAMAGE (Per accident)	
		☐ HIRED AUTOS					
		☐ NON OWNED AUTOS					
		GARAGE LIABILITY				AUTO ONLY - EA ACCIDENT	
		☐ ANY AUTO				OTHER THAN AUTO ONLY : EA ACC	
						AGG	
A		EXCESS / UMBRELLA LIABILITY	007787828	07/01/2009	07/01/2010	EACH OCCURRENCE	$10,000,000
		☒ OCCUR ☐ CLAIMS MADE				AGGREGATE	$10,000,000
		☐ DEDUCTIBLE					
		☐ RETENTION					
		WORKERS COMPENSATION AND EMPLOYERS' LIABILITY Y/N				WC STATUTORY LIMITS ☐ OTHER	
		ANY PROPRIETOR / PARTNER / EXECUTIVE OFFICER/MEMBER EXCLUDED? ☐ (Mandatory in NH)				E.L. EACH ACCIDENT	
		If yes, describe under SPECIAL PROVISIONS below				E.L. DISEASE-EA EMPLOYEE	
						E.L. DISEASE-POLICY LIMIT	
		OTHER					

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/EXCLUSIONS ADDED BY ENDORSEMENT/SPECIAL PROVISIONS
EVIDENCE OF INSURANCE

CERTIFICATE HOLDER

VEOLIA ES TECHNICAL SOLUTIONS, LLC
ONE EDEN LANE
FLANDERS NJ 07836 USA

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING INSURER WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO DO SO SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE INSURER, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE *Aon Risk Services Central, Inc.*

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