Facility Information
Veolia ES Technical Solutions, L.L.C.
Port Arthur Texas

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VEOLIA
ENVIRONMENTAL SERVICES

1. GENERAL INFORMATION

INCINERATOR AND TSDF OPERATIONS

Veolia ES Technical Solutions, LLC

Physical Location*:
Highway, 73, 3.5 miles West of Taylor Bayou, Port Arthur, TX 77640

*Use for overnight deliveries and manifests.

Post Office Mailing Address:
P.O. Box 2563
Port Arthur, TX 77643-2563

Phone Number: 409.736.2821
Facsimile Number: 409.736.1636

CUSTOMER SERVICE
800.624.9302

Contact Information:

Rean Swanson	Business Manager	409.736.4154
David Michaelis	Sales Manager	281.216.9618
Dan Duncan	ES&H Manager	409.736.4146

FACILITY ID NUMBERS:
USEPA - TXD000838896
STATE – 50212
SIC – 4953
NAICS - 562211

Dunn & Bradstreet ID:
099202681

Tours and Audits
Please contact your Veolia Account Manager or Gulf Coast Customer Service at 800-624-9302 to schedule an audit or tour. Unless otherwise requested, audits are limited to 3 hours and are usually conducted in the morning. Typically this involves a presentation followed by a facility tour and wrap-up. Tours are conducted outside of waste processing areas. Due to safety visitor entry to active waste processing area is restricted. PPE (other than shoes) is provided or you may supply your own. PPE requirements are hard hats, safety glasses with side shields and/or goggles, closed toed shoes and long pants. Site specific emergency procedures will be covered during orientation. Audits beyond this scope will be handled by the facility on a case by case basis. An audit package containing a three year compliance history and other facility documents will be provided.

2. GULF COAST BRANCH

The Veolia Gulf Coast Branch consists of the Port Arthur Incinerator, outbound TSDF operations as well as two Customer Service Centers located in Baytown Texas and Atlanta GA. There are approximately 240 employees.

THERMAL FACILITY

Located west of the City of Port Arthur, Texas on Highway 73, Veolia operates a high temperature rotary kiln and full service TSDF. Incineration residues are managed off-site. Operation is 24/7 with a full time facility staff of approximately 180 employees.

The facility handles a wide range of RCRA and TSCA waste in both bulk and drums. Three direct inject lines enables the facility to handle non-compatible waste streams that cannot be managed through the tank farm.

GULF COAST CUSTOMER SERVICE – BAYTOWN TEXAS and ATLANTA GA

There are Service Centers located in Baytown, TX and Atlanta GA. Baytown is a suburb of Houston, Texas and is located approximately 60 miles west of the incinerator. The Gulf Coast Service Center handles customer service and scheduling for the Port Arthur facility and is the primary hub for Veolia's Field Services, Transportation and Sales Support. This facility houses a 10-day transit yard and a fleet of Veolia vehicles.

The Gulf Coast Service Center employees are prepared to manage projects for our clients varying from small container management jobs such as lab packs and drum identification to large specialty jobs requiring multiple shifts and varying levels of personal protective equipment.

3. TRAINING

SERVICE CENTERS:
Our professionally trained field service crews have received at a minimum: 40 hours of OSHA instruction meeting the requirements of 29 CFR 1910.120 with 8 hours of annual refresher training, DOT Hazardous Materials training meeting the requirements of 49 CFR 172.704, training on the Veolia field manifesting, labeling, and tracking system, and other applicable safety and environmental topics.

FACILITY EMPLOYEES:
Training for facility personnel meets or exceeds compliance with 29 CFR 1910.120, in addition to RCRA and TSCA training requirements. HAZMAT employees are required to have either 24 or 40 hours of OSHA HAZWOPER instruction and receive 8 hours of refresher training annually. All new employees receive 1.5 days of site orientation training from the Safety and Environmental Department that includes classroom instruction in: Basic Hazard Communication Specific to Site Operations and Material Handling, Processing and Handling Specific to PCB Material, Overview of Site Safety, Environmental and Security Procedures, Overview of Site Required Documentation, Site Contingency Plan, Emergency Response Procedures, Safe Work Permit System, Decontamination Procedures, Personal Protective Equipment, and an Overview of Human Resource Procedures.

Specialized Training
Additional training classes are provided to facility employees based on the type of work they perform. Specific training on area processes, equipment operations and field procedures must be completed prior to operations personnel being deemed qualified to perform their assigned duties. Operator qualifications include skills evaluation and written tests.

Full PPE and Hazard Communication training is given to those individuals whose job classifications require it, including respirator use and fit testing.

Specialized certifications for designated operations personnel and Supervisory personnel include: Incident Command / Emergency Response, Confined Space Rescue, Emergency Care Attendant, Industrial Fire Fighting, RCRA Guidelines and Inspections, Forklift Operation and Crane Operation.

Annual refresher training is conducted as required safety training. Supervisors also conduct employee meetings, and periodic inspections in support of the overall Safety Program.

Virtually 100% of the site's operational personnel have received fire extinguisher training. There is also an Emergency Response Team, which receives extensive fire training beyond incipient.

4. BRANCH SERVICES

Transportation
The Veolia Gulf Coast Service Center in Baytown provides transportation services and also uses a network of reliable subcontract haulers to serve our customer needs. Call the Gulf Coast Service Center at 800-624-9302 and one of our Customer Service Representatives can assist you.

What equipment is available?
The Facility and its subcontractors are well equipped with the following types of equipment: tractors, van trailers, tanker trucks, roll-off trailers, end dumps, flatbeds and roll-off boxes.

In addition, Veolia ES Technical Solutions has a large network of transportation offices across the country with similar equipment and the company has over 500 intermodal rail/truck rolloffs for long haul and large jobs.

What licenses or registration numbers apply?
Veolia ES Technical Solutions' DOT registration license number is 609181. The ICC registration license number does not apply, as we are a private carrier.

What is Veolia's Transportation EPA Identification number?
Veolia Environmental Service's EPA ID for all transportation services is NJD080631369.

What is Veolia Transportation's Texas Identification number?
Veolia Environmental Service's Texas Identification Number for transportation services is 84594.

Does the state agency issue state manifest forms?
No. As of September 5, 2006 the federal Uniform Hazardous Waste Manifest form is the only acceptable shipping document for shipments of hazardous waste and Texas Class 1 Industrial waste. The Texas Uniform Hazardous Waste Manifest form is no longer acceptable. Manifest forms can be obtained by calling a Veolia Customer Service Representative or through a registered printer with the EPA.

5. FACILITY SHEDULING

What general scheduling guidelines does the incinerator employ?
Once your waste is approved, your Customer Service Representative will assist you in scheduling. Only waste streams that are fully approved and contracted can be scheduled. Delivery hours are 7:00 AM to 3:00 PM Monday through Friday. Your transporter will be provided with actual time slots to avoid unloading delays.

Where does a customer submit a schedule request?
Schedule requests should be submitted to the Veolia Gulf Coast Service Center at 800-624-9302.

How are typical waste loads received at the facility?

1. Drivers will sign in at security. If new to the facility, the driver will need to watch our Safety and Information Video prior to entry.
2. Waste Approval status and manifest information will be verified.
3. After verification, all trucks will be routed through the Radiation Monitor and Weigh Scales.
4. Tanker and boxes (bulk waste) will proceed to sampling areas. Vans will be directed to Container Storage Building for off-loading.
5. After "fingerprinting" bulk loads will proceed to a holding area until analytical is complete.
6. Once fingerprinting determines the waste is conforming to its profile, the truck will be directed to its respective area for offloading.
7. After unloading the driver will return to the weigh scales for an empty weight determination, return of paperwork and allowed to exit the site.

6. SITE HISTORY

THERMAL INCINERATOR and TSDF COMPLEX DESCRIPTION

What is the history of the site?
Conservation Services, Inc. developed the site as a land-farm and hazardous waste landfill in 1975. Waste Management purchased the site in 1978, and was operated as a member of the Chemical Waste Management family until 1999. In 1999, Vivendi (now Veolia) and Waste Management (parent company of Chemical Waste Management) entered into a joint venture. The joint venture was dissolved on January 29, 2002, when Vivendi purchased the incineration complex from Waste Management and the permits were transferred*. Effective July 1, 2006 the company name was changed to Veolia ES Technical Solutions, LLC.

* See additional information in following section concerning this purchase.

What is the facility acreage? (Active vs. Total):
The active area of the Veolia Gulf Coast Treatment Center in Port Arthur, Texas is located on approximately 156.5 acres South of State HWY 73 in Jefferson County, Texas. The total acreage owned is approximately 2700.

WASTE MANAGEMENT CLOSED LANDFILLS – ADJACENT TO SITE

What is the history of these landfills?
**The following is offered for informational purpose only. Additional inquiries should be directed to Waste Management in Houston TX.*

Prior to property transfer and division, Waste Management operated the site under a single permit. After the sale to Veolia, the site and permits were split. The two closed landfills remained with Waste Management.

Waste Management owns two sections of property (Western Sector and Eastern Sector) that constitute Landfills 01 and 02. Chemical Waste Management, Inc. purchased the site from Conservation Services, Inc. in August 1978. On the Western Sector, 160 acres make of the 01 section. On the Eastern Sector, 282 acres make up the 02 section. The 01 section was officially capped and certified closed in January 1984. The 02 section stopped receiving hazardous waste during 1985. Final closure of the 02 landfill was initiated in July 1999, and completed in 2001.

Has the facility ever operated or maintained any surface impoundment?

Yes as Waste Management

Under Compliance Plan Number 50212 issued by the Texas Commission on Environmental Quality (TCEQ), Veolia is required to conduct a corrective action and ground water monitoring program on an area previously owned by Waste

Management, just north of the closed 01 landfill. Historical information indicates the area was probably used as a truck wash station for vehicles delivering wastes to the landfill. Seven groundwater monitoring wells are located in this area. Two of the wells are designated as recovery wells and are located on Veolia property. Groundwater is continuously removed from the two recovery wells and managed in the facility's injection wells. The contaminants of concern include arsenic and 1,2 dichloroethane.

As part of the sales agreement between Chemical Waste Management and Vivendi, all associated operation and maintenance activities with the wells are conducted by Waste Management personnel. Waste Management is also responsible for submitting the semi-annual reports that document the results of the monitoring and recovery efforts. Recent reports indicate that the level of contamination in the area is diminishing due to natural attenuation and because most of the source of the contamination was removed when the tanks associated with the injection wells were constructed.

Are there any plans to construct additional landfills at the site?
No.

7. SECURITY

How is unauthorized entry prevented?
A six-foot security chain link fence with three strand barbed wire surrounds the entire active portion of the site. Entry to areas on site utilized for waste management is allowed only through designated gates (vehicles) and the office buildings (persons). Entry is controlled by a computerized key card access system. Office buildings are securely locked after normal business hours.

The main entry gate is controlled 24 hours a day. Closed circuit television cameras monitor the facility as well as entry and exit through the main truck entry gate and the main employee entry gate. All gates in the perimeter fence are kept securely locked at all times except during special projects, when a guard or operator is stationed at the gate for access control. Additionally, warning signs are posted at the entrance and on the perimeter fence at a minimum of 50-foot intervals. The signs read "Danger, Unauthorized Personnel Keep Out".

8. WASTE ACCEPTANCE

What wastes are accepted by the facility?
The Port Arthur facility is permitted to handle all of the six RCRA hazardous waste code categories (i.e., ignitable, toxic, corrosive, acute hazardous, EP toxic, and reactive), PCB and CERCLA waste with only a few specific exceptions. The incinerator accepts waste solvents, solvent/oil mixtures, organic and inorganic chemical wastes, pesticide wastes, petroleum wastes, aqueous wastes, contaminated soils, sludge, PCBs and capacitors, among others. Non-incineration wastes are also accepted and managed through our third party TSDF program.

What wastes are prohibited or limited by the incinerator permit?
The following wastes are prohibited or limited by permit: radioactive or nuclear waste material, explosive material, listed dioxin containing wastes (i.e., F020 - F023, and F026 - F028), and municipal garbage. Waste codes that have specified technology treatment requirements may be restricted unless the waste matrix is amenable to treatment by combustion.

Does the facility accept polychlorinated biphenyls (PCBs)?
The facility received its TSCA authorization June 1, 1992 allowing acceptance of liquid and solid PCBs. Scheduling and processing of these wastes began in September 1992.

Is there a Waste Analysis Plan Required?
Yes. A Waste Analysis Plan (WAP) has been developed in accordance with 40 CFR 264.13(b) and our TSCA permit. The WAP is incorporated by reference into our permit and available for inspection.

How is waste shipments sampled?
All incoming bulk loads are generally sampled and inspected unless they are exempted under the facility's waste analysis plan. Examples of wastes that may be exempted are remediation projects or other large volume single source waste streams. Other materials that are problematic to sample such as large debris or air and water reactive waste may also have sampling waived if sufficient generator knowledge is available. The Technical Manager may grant some exceptions to other waste types where allowed by the WAP and there is sufficient information available to make the appropriate waste management decisions.

What parameters are run on sales samples?
Incinerator parameters typically include:
Physical description, Color, Odor, Physical state (i.e., solid, semi-solid, liquid, etc.), Layering, pH (aqueous), Water mix (Water reactivity), Flammability potential screen, Cyanides screen (aqueous with pH>2 only), Sulfides screen (aqueous with pH>2 only), Heat value, Ash percentage, Halogen content (Total of each: Fluorine, Chlorine, Bromine,), Sulfur content, PCBs, Specific gravity on Liquids, Viscosity (liquids only), Percent water by Karl-Fisher Titrator, Radiation screen, and metals

(Sodium, Potassium, Lead, Cadmium, Iron, Mercury, Arsenic, Chromium, Nickel, Beryllium, Vanadium, Thallium, Barium, Silver, Zinc, Antimony, Selenium and others)

What confirmatory parameters are run on incoming wastes?
Most incoming wastes are "finger-printed" to ensure that the waste previously profiled and approved is similar to the material actually received.

Mandatory Receiving Analysis

- Physical Description (appearance)
- pH
- Water Mix (Compatibility)
- Flammability Potential
- Cyanides Screen
- Sulfides Screen
- Heating Value (BTU)
- Chlorine Content (Cl)
- Radioactivity Screen (Gate -Gamma Radiation Monitor)
- Oxidizer Screen
- PCB analysis for TSCA regulated waste

Metals may also be required as determined by profile and Waste Analysis Plan.

The facility is equipped with Radiation Portal Monitor that automatically scans all in-coming receipts for gamma radiation. Waste with above background readings may be subject to additional testing prior to acceptance.

How are Incoming wastes checked versus manifest?
Representative samples are obtained and characterized by a series of analyses called a fingerprint. The results are reviewed and approved by the Lab Manager, the site Technical Manager or their respective designee then compared to the waste profile sheet, which is subsequently compared to the manifest. Once appropriately approved wastes are released for disposal (or significant discrepancy resolution).

Has the facility rejected wastes in the past for any reason?
Yes, on rare occasions. Generally, these loads may have been non-conforming to its original waste profile characterization or codes discovered during fingerprinting were a violation of the site's permit to accept. In either case, generators are notified as soon as a significant discrepancy is discovered. Furthermore, it is the policy of this site to seek out all available alternate solutions.

9. LABORATORY AND ANALYTICAL CAPABILITIES

The Facility's Analytical Laboratory provides all incoming receipt and process analyses for the Port Arthur incinerator and injection well. The laboratory also conducts annual customer waste re-certification analysis and may complete pre-acceptance analysis as well.

How is the laboratory organized?
The building is divided into four areas – Sample check-in, PCB analysis, metals, and wet chemistry, with associated prep areas for each.

What types of instrumentation are located in the laboratory? See Typical List Below.

- GCs for PCB;
- Cold Vapor Atomic Absorption Spectrometers for Mercury analysis;
- Inductively Coupled Argon Plasma (ICAP) – total metals;
- Dionex Ion Chromatographs (halogen content) ;
- Parr Adiabatic Calorimeters for BTU determination;
- Dohrman Total Organic Carbon (TOC) Analyzer;
- Shimadzu Total Organic Carbon (TOC) Analyzer;
- Mitsubishi KF Titrators for water/moisture determination;
- Closed Cup Flash testers;
- Oil and Grease analyzer;
- Brookfield Viscometer;
- pH meters, etc.

What size laboratory staff is maintained?
At full staffing, approximately 13-15 employees operate and supervise the laboratory.

How are laboratory wastes collected and disposed?
Aqueous laboratory waste is collected and transferred to the incinerator for disposal. Laboratory samples and other solid wastes are containerized or lab packed and managed in the incinerator.

Who is responsible for Laboratory Quality Assurance/Quality Control?
Quality Assurance/Quality Control is the responsibility of the Technical Manager. In addition, a laboratory QA/QC Coordinator is responsible for implementation of Laboratory QA/QC according to Veolia's policy and procedure.

What constitutes Veolia's Quality Assurance/Quality Control procedures?
The Facility has developed a program of Quality Assurance practices and procedures to provide defensible valid data on a timely basis. This policy provides the basis on which those practices and procedures are developed. All company laboratories and sampling personnel are required to participate in this program. Contract

laboratories employed by the company must demonstrate quality assurance practices at least as stringent as the company's program.

PRICINPLES

- Defensible Documentation
- Analytical Methods
- Facility Adequacy
- Equipment Maintenance and Calibration
- Personnel Training
- External and Internal Assessment
- QC Policy and Procedures

At a minimum we employ the following:

- Analyze quality control samples each day.
- Evaluate contamination control each day.
- Perform duplicate sample analysis on a 20% frequency.
- Perform sample fortification analysis on a 20% frequency.
- Analyze Standard Reference Materials - EPA and NIST semi-annually.

What outside laboratories are utilized?

Contract laboratories utilized in the recent past for specialty work include:

- Earth Analytical - Beaumont, Texas
- Environmental MicroAnalysis - Woodlands CA
- TestAmerica Laboratories - Arvada CO and Sacramento CA
- Chemtex Environmental & Industrial Hygiene –Port Arthur TX

10. REGULATORY

What permits are currently maintained by the facility?
See attached list.

What is the closure financial insurance mechanism and funding level?
Under the Federal rules for financial assurance, the facility has selected to maintain closure and post closure funds via Letter of Credit.

What is the site's compliance record?
The current management has demonstrated unquestionable commitment to environmental compliance as evidenced by both our excellent relationship with the EPA and the TCEQ and our strong compliance record. Upon request a 3-year compliance history will be provided

What state agency is authorized to administer the RCRA Program?
The Texas Commission on Environmental Quality (TCEQ) is authorized to administer the RCRA and TPDES Programs and has primacy over any other state agency. EPA oversees HSWA and TSCA regulations, and the NMP for the Class I UIC well.

Where is the state agency located?
Texas Commission on Environmental Quality (TCEQ) Region 10
3870 Eastex Freeway, Suite 110
Beaumont, TX 77703
Phone 409.898.3838

What is the frequency of regulatory inspections?
The TCEQ performs RCRA inspections, air inspections, Underground Injection Control inspections, wastewater inspections, and storm water discharge inspections annually. The Environmental Protection Agency inspects as desired, but has a contract inspector, Texas Department of Health (TDH), performing detailed TSCA inspections. Inspections dates and the findings are included in our compliance history.

REGULATORY CONTACT LIST

PERMITTING

BILLY SPILLER	TCEQ, AUSTIN (512)239-6623	RCRA (Incinerator, Tanks, and Container Storage buildings)
JIM SALES	USEPA, DALLAS (214)665-6796	TSCA (PCB Storage and Disposal Authorization)
BEN KNAPE	TCEQ, AUSTIN (512)239-6633	Class 1 UIC Well
BRIAN GRAVES	USEPA, DALLAS (214)665-7193	Class 1 UIC Well No Migration Petition (NMP)

COMPLIANCE

ROBERT COLLAZO	TCEQ REGION 10, BEAUMONT, TX (409) 898-3838	RCRA & Class 1 UIC Well
RICHARD GIGGER	USEPA, REGION 6, HOUSTON TEXAS (281)983-2105	PCB's
BRIAN GRAVES	UESPA, DALLAS (214) 665-7193	Class 1 UIC Well NMP
LEE ANN MERRELL	USEPA, BEAUMONT, TX (409) 838-3838	Title V
RONALD HEBERT	TCEQ REGION 10, BEAUMONT, TX (409) 898-3838	TPDES

11. SITE GEOLOGY, HYDROGEOLOGY

What is the underlying soil depth, type and permeability?
The depth of the uppermost soil layer is approximately 15 feet. Soil underlying this facility is class CH ASTM standard clay. The underlying soil has an average permeability of 1×10^{-8} cm/sec.

What is the depth to the groundwater?
The uppermost groundwater aquifer is 17-35 feet below the ground surface. The principle aquifer is located at a depth of 300 feet. No potable water exists beneath the site.

What is the average temperature?
Annual temperatures normally range from 40-100 F. Below freezing temperatures are experienced only for short periods during winter.

What is the annual precipitation?
Annual rainfall is in excess of 60 inches per year.

What is the distance to the nearest body of water?
The nearest body of water is Taylor Bayou located 1.25 miles north of the facility, and 3.5 miles east of the facility.

Is the facility located in a 100-year flood plain?
Yes. The facility is located in the 100-year flood plain. Twelve to fifteen foot levees are maintained around the active and closed areas of the site (with the exception of the closed 01 and 02 landfill) to protect against rising floodwaters and potential washout of wastes. The twelve foot levees on the north, east, and west sides of the facility are designed to accommodate a maximum flood storm water level of 10.9 feet, with more than a foot of freeboard. The 15 foot levee on the south side with its 4:1 slope and 10 foot wide crest will handle wave run up action during a hurricane.

How is the adjoining land used?
Land adjoining and surrounding the facility is generally inactive or serves recreational purposes and farming. The facility has purchased approximately 320 acres adjacent to the south end of the facility to use as a buffer between the site and bordering land.

How is storm water handled?
Storm water that falls in non-containment areas flows into the site's TPDES storm water basin then discharged through the site's permitted 001 Outfall. Water discharged through the 001 Outfall is tested on a daily basis to ensure compliance with current permit effluent limitations.

What are the TPDES effluent limitations observed by the site?
Storm water is tested for:

- Oil and Grease
- pH
- Total Organic Carbon (TOC)
- Chemical Oxygen Demand
- Phenols
- Various Metals

Where are the TPDES outfalls located?
Outfall 101 is located at the Sanitary Wastewater Treatment Unit. The effluent from the sanitary treatment unit commingles with the storm water from the TPDES Collection Basin as well as the storm water from the other entire surface water drainage trench systems at outfall 001 located across from the administration building.

What body of water ultimately receives storm water discharge?
The storm water travels along dedicated ditches to reach Taylor Bayou.

How does the site manage spills?
Veolia has an active and vigorous program in place to promptly identify and remove any contamination, which may occur as a result of an inadvertent waste spill. Most spills, which occur at Veolia, are of less than one quart in volume.

12. AIR QUALITY ASSURANCE

Does the facility maintain a fugitive emission monitoring program?
The Facility conducts a quarterly air monitoring program whereby every valve, pump and flange in volatile organic compound service is tested with a hydrocarbon analyzer for leaks. Additionally, tank farm pressure relief valves are monitored bi-weekly.

Four additional ambient air hydrocarbon monitors are stationed strategically around the incinerator's tank farm to detect fugitive emissions from the bulk liquid operation. Additionally, after maintenance, VOC testing is performed to ensure a leak free repair.

What stack emission characteristics are monitored?
Continuous monitoring of stack emissions for CO, CO_2, SO_2, HCl, and O_2 is performed. CO_2 concentrations are utilized for combustion efficiency calculations that are performed during the incineration of PCB materials. This data is continuously monitored by our Taylor DCS computer system.

How are stack emissions controlled?
Stack emissions are controlled by cleaning incineration gases in the Air Pollution Control system and by limiting the waste feed characteristics. These waste feed limitations were derived from air dispersion computer modeling to determine off-property and maximum ground level concentrations (MGLCs) for 126 volatile organics as well as a group of criteria pollutants in accordance with the procedure prescribed by the Texas Commission on Environmental Quality. Worst case assumptions were built into these calculations to provide margins of safety and include, among others:

- That the incinerator will be operated 24 hours per day, 365 days a year at maximum loading of the pure chemicals.
- That emissions release occurs at ground level with no plume rise.
- The most disadvantageous weather conditions would exist at any given time.

As a result, given the feed limitations of the permit, no applicable ambient air quality or net ground level standard would be exceeded for organics, nor would NO_x and So_x emissions impinge upon the national air quality standards when modeled with other NO_x and SO_x sources in the area.

How are fugitive emissions limited or controlled during waste sampling and unloading?
Fugitive emissions are prevented by engineering controls at each waste feed processing station. For example, negative pressure is maintained inside the kiln allowing headspace vapors from all the tanks, and the low flash bulk solids system to be systematically swept to the incinerator eliminating the possibility of escaping emissions. The regular waste bulk solids system, bulk solids trans-load building, and the truck wash building are vented to the Regenerative Thermal Oxidizer (RTO).

How are airborne particulates controlled?
The permit limitation for stack particulate emissions (0.03grains/dscf) is more stringent than the corresponding RCRA standard (0.08 grains/dscf). The burn data suggests the incinerator out-performs the permit limitation by nearly an order of magnitude. In addition, all waste truck traffic roads have been paved.

Has the facility under gone improvements?
Complying with the requirements of 40 CFR Part 63 Subpart EEE – National Emissions Standards for Hazardous Air Pollutants from Hazardous Waste Combustors (generally referred to as MACT) focused on the installation of pollution prevention control and waste feed enhancement equipment that will significantly reduce the potential for any emission and operating parameter exceedances.

The installation of a wet electrostatic precipitator (WESP) downstream of the ionizing wet scrubber was completed in April 2002. The new WESP increased fine particulate removal, including low and semi-volatile metals. Also, a larger induced draft fan was installed to reduce the potential for fugitive emissions.

Completion of a new waste processing building equipped with larger mixing pits and state of the art shredders and blending equipment in 2004 significantly improved the consistency of the waste feed mixture. This reduced the potential for carbon monoxide exceedances and positive pressure events. A continuous emissions monitoring system (CEMS) was installed in the stack with the capability to continuously analyze hydrogen chloride emissions, in addition to oxygen, carbon monoxide, carbon dioxide, and sulfur dioxide. Finally, shrouds equipped with an emission collection system were installed around the kiln seals to reduce the potential for fugitive emissions.

13. SITE GENERATED WASTE MANAGEMENT

How is scrubber blow-down managed?
Our injection well with tank T-201, a one million gallon storage tank, provides convenient on-site scrubber blow down management and disposal capability. Incinerator scrubber blow down is collected in tank T-201, and then transferred over to tank T-101A/B where it is pH adjusted between 2.5 to 3.0, filtered through a 5-micron filter, into T-102, filtered through a 1-micron filter then injected.

How are incinerator solid residues managed?
Presently incinerator ash, filter cake, slag and refractory brick are shipped to WMI's Lake Charles, Louisiana and Emelle, Alabama facilities for stabilization and landfilling.

Are any of these residues de-listed?
No.

Are all site-generated wastes shipped off site?
No. The majority of our untreated site-generated waste is incinerated, i.e. filter cartridges, tank bottoms, etc. Wastes that require further stabilization, treatment or landfilling are shipped off site.

Does Port Arthur facility recycle or reuse any site-generated wastes?
Yes. All used lead/acid batteries, fluorescent light bulbs, and most spent solvents used are recycled. These activities reduce the amount of waste generated onsite.

Typical Site Waste Generated

WASTE NAME	TYPE	RECEIVING FACILITY	METHOD
Incinerator Ash	Hazardous	CWM - LAKE CHARLES, LA	LANDFILL
Slag, Refractory Brick, Misc. Train Solids	Hazardous	CWM - LAKE CHARLES, LA	LANDFILL
Filtercake	Hazardous	CWM - LAKE CHARLES, LA	LANDFILL
PCB Debris	Hazardous	CWM – EMELLE, AL	MACRO
Contact Sump Water	Hazardous	MANAGED ON-SITE	INCIN
Non-Contact Sump Water	Non-Hazardous	TPDES DISCHARGE	N/A
Dewatered Sludge/Filtermedia	Non-Hazardous	CWM - LAKE CHARLES, LA	LANDFILL
Scrubber Blowdown Water	Hazardous	MANAGED ON-SITE	DEEPWELL
Spill Cleanups & Misc. Solids	Hazardous	MANAGED ON-SITE	INCIN
Non-Hazardous Solids	Non-Hazardous	CWM - LAKE CHARLES, LA	LANDFILL
Labpacks	Hazardous	MANAGED ON-SITE	INCIN
Used Motor Oil	Non-Hazardous	MANAGED ON-SITE	INCIN
Lead Acid Batteries	Universal	VEOLIA - PHOENIX, AZ	RECYCLE
Tank Bottoms	Hazardous	MANAGED ON-SITE	INCIN
Fluorescent Bulbs	Universal	VEOLIA - PHOENIX, AZ	RECYCLE
Aerosol Cans	Hazardous	MANAGED ON-SITE	INCIN
RCRA Empty Drums	Non-Hazardous	CWM – EMELLE, AL	LANDFILL
Deepwell Filter Cartridges	Hazardous	MANAGED ON-SITE	INCIN
Laboratory Rinsate	Hazardous	MANAGED ON-SITE	INCIN
Parts Cleaning Solvent	Universal	SAFETY KLEEN	RECYCLE

14.

15. HEALTH AND SAFETY

How is the facility's OSHA record?
The Veolia facility in Port Arthur has never had a serious OSHA violation at this facility. It is the objective of the facility to have in place a program meeting OSHA's volunteer protection program. The Customer Service Center in Baytown is OSHA Star status.

When was OSHA's last inspection of the site?
The facility's last OSHA inspection was September 2001 with periodic visits to observe site safety implementations.

What is the site's Health & Safety record?
The Gulf Coast Branch has maintained an excellent health and safety record over the years. The facility has received the Veolia President's Safety Award on several occasions.

Summary - OSHA Logs

Year	Facility Total Man Hrs.	OSHA Recordable Injury Rate	Lost Time Rate
2009	440704	4.54	1.36
2010	427126	5.45	0.99
2011	421744	0.52	0.52
2012	388674	2.57	0.51

Does the site maintain a Contingency Plan?
The facility maintains a Contingency Plan in full compliance with 40 CFR 264 Subpart D. All new employees receive initial orientation on the Emergency Contingency Plan and subsequent annual refresher training.

The plan may be summarized as chain-of-command emergency reporting to the Emergency Coordinator. The Emergency Coordinator has the responsibility to mobilize the necessary response personnel and equipment and initiate notification to applicable agencies. A Casualty Control Officer, Personnel Coordinator, and Communications Coordinator assist him.

What emergency response capabilities are maintained on site?
The site has an Emergency Response Team trained in fire-fighting, emergency rescue and first aid. Emergency equipment includes a fire engine, fixed fire suppression systems, a response trailer equipped to respond to any spill in any area of the facility and emergency rescue / medical equipment.

How is Personal Protective Equipment supplied and utilized?
Personal Protective Equipment (PPE) is purchased and maintained by each department via Central Purchasing. Its use is mandated according to four situations. First: PPE usage for the handling of process chemicals such as caustic or hydrochloric acid in accordance with the approved task specific standard divisional practices written for that procedure. Second, PPE usage for the sampling of waste shipments is determined on a waste stream basis by trained chemists and communicated to the samplers through Receiving. Third, site-wide PPE requirements have been established requiring, at minimum, hard hats, safety glasses with side shields, steel-toed boots, and long sleeve shirts in all operations areas of the facility. Fourth, varied PPE requirements for each job description are outlined in all site Standard Division Practices.

Does the facility maintain a Spill Prevention Control and Countermeasure Plan (SPCC)?
The site has a Spill Prevention Control and Countermeasure plan in full compliance with 40 CFR Part 112. The 8,000 gallon auxiliary fuel tank for the incinerator is also secondarily contained, as are the tank truck unloading bays. The 1,000 gallon gasoline tank and the 8,000 gallon fuel oil tank utilized for vehicle maintenance are within secondary containment. All pumps containing quantities of motor oil are provided with secondary containment. The SPCC plan is available for inspection upon request.

How is spill containment designed into the site?
The facility was designed with various spill control features in mind. All tanks are above ground and are secondarily contained to capture the equivalent of the largest tank volume (or 25% of the total tank volume, whichever is higher) plus an allotment for a 24-hour, 25 year rainfall event (approximately 11 inches). There are no underground tanks at the facility. All tanker unloading bays are secondarily contained and equipped with collection sumps. Storage aisles in the Container Building are constructed with four inch berms.

What site safety audits or inspections are performed?
Veolia ES Technical Solutions Corporate Audit Team performs an audit of facility environmental compliance and safety programs every 18 months. These corporate audits, in addition to the permit required inspection program, are supplemented by facility staffed Self-Assessments of specific management areas on a routine basis.

Inspection of site equipment is in accordance with 29 CFR 1910, 1926 and 40 CFR 264. Site safety inspectors perform weekly and monthly inspections of each area in the facility to identify any deficiencies or potential problems with the various safety and fire-fighting equipment. All inspection reports are maintained in the Central Files.

In accordance with RCRA regulations, the facility performs area inspections daily, weekly and monthly. The area inspections include, among others, the Container

Storage Building, the Truck wash Building, the incinerator and Air Pollution Control (APC) train, the Tank Farm, roll-off box storage areas, etc. The weekly inspections cover safety equipment and container storage compliance issues.

RECORDS AND REPORTS

Where are operational records maintained and for how long?
Operational records are maintained on site in Central Records. Records are kept in fireproof file cabinets and maintained indefinitely. Most of the records are also scanned for permanent recordkeeping and as well as ease of access.

Does the site employ a waste tracking system?
Yes, a site specific data soft-ware Waste Tracking System is used that systematically tracks wastes from its receipt, storage, to the various processing areas, as well as its destructions and the resulting ash. All containers are barcoded with all waste movements captured.

How long are manifest copies retained?
Manifest copies are retained indefinitely.

Are Certificates of Destruction available?
Yes. Certificates of Destruction are issued for all TSCA waste. Certificates of Destruction for RCRA wastes are available upon request and per contractual requirements.

16. INCINERATOR AND DEEPWELL OPERATION

INCINERATOR

What is your primary treatment process?
In 1989, the facility completed construction of a rotary kiln incinerator with secondary combustion chamber that is capable of destroying RCRA and TSCA bulk solids, sludge, bulk liquids, and containerized waste. The facility received CERCLA status in December 1993. The facility also operates third party out-bound TFDS activities for waste not suitable for incineration.

What is the permitted throughput of the incinerator?
The incinerator is permitted for up to 57,198 lbs/hr of waste throughput of RCRA and TSCA waste and auxiliary fuel with hourly constraints on individual feed devices, feed concentrations, and heat releases.

What are the permitted hourly BTU limitations?
There are no specific BTU limits to the kiln or SCC. Thermal loading is controlled by a permitted stack oxygen limit of 3% and a stack gas flow limit of 39,248 DSCFM.

What type of waste is fed to the kiln and to the Secondary Combustion Chamber?
RCRA and TSCA solids, sludges, energetic liquids, lean water, and containerized wastes are fed to the kiln. Additionally, RCRA and TSCA energetic liquid wastes are fed to the SCC.

What is the temperature inside the kiln and the Secondary Combustion Chamber?
There is one primary burner and six waste burners located on the faceplate of the kiln that operate to maintain temperatures above an (hourly rolling average) HRA of 1316^{o}F**.** In the vertical Secondary Combustion Chamber (SCC) eight vortex burners encircle the interior and are angled to induce rotational movement of the flue gases. The current minimum operating temperatures in the SCC are 2012^{o}F instantaneous and an HRA of 1945^{o}F.

What are the dimensions of the rotary kiln?
The rotary kiln is 16 feet in outer diameter, 60 feet long and lined internally with 12 inches of refractory brick.

What is the residence time for a solid waste inside the kiln and gases in the SCC?
The residence time of solids in the kiln is approximately 30 to 90 minutes and five to ten seconds for gases. Gas phase residence time in the SCC is two to five seconds. As the waste is heated in the kiln, organics will be destroyed in place or volatilized and subsequently destroyed in the SCC. A minimum of 99.99% (typically > 99.9999%)

Destruction Removal Efficiency (DRE) for RCRA and >99.9999% for TSCA is achieved.

How fast does the kiln rotate?
The kiln rotates at a nominal 0.5 to 1.0 revolutions per minute exposing all portions of the waste to the high temperatures and oxidizing atmosphere. The kiln can rotate as fast as 2.5 revolutions per minute depending on the constituents of the waste and its appropriate residence time.

How is waste introduced to the kiln?
Solid feed is introduced into the kiln via a container ram feeder, a bulk solids chute and a putzmeister (sludge) feed nozzle. Liquid feed is introduced through one aqueous waste nozzle, one energetic sludge nozzle, one non-energetic sludge nozzle, one energetic liquid waste nozzle, one specialty feed nozzle and one direct inject nozzle for energetic or non-energetic liquid feed. Small cylinders are handled through a cylinder box and fed into the kiln.

How is waste introduced to the SCC?
Waste is introduced into the SCC via six energetic liquid nozzles and two direct inject nozzles.

What type of make-up fuel is used for the burners?
Make up fuel for the burners and pilot is natural gas.

What are the technologies applied in the purification of flue gases?
In the combustion gas purification train, the gases will be: (1) adiabatically quenched from approximately 2012^{o}F to 185^{o}F using water and recirculated scrubber liquid, (2) scrubbed for acid gases and larger particulates with an NaOH enriched scrubber liquid in two parallel packed bed absorbers and (3) scrubbed for fine particulates in two parallel train, four stage ionizing wet scrubbers. In addition, a Wet Electrostatic Precipitator (WESP) has been installed downstream of the IWS for compliance with MACT. The resulting cleaned flue gas exits the 130-foot stack. Particulate emissions are less than 0.03 (typically 0.006) grains per dry standard cubic foot, far better than the 0.08 RCRA standard. HCl control efficiencies are greater than 99% (typically greater than 99.8%) thereby controlling HCL emissions well below the RCRA and CAA - MACT standards.

How is the Burn Plan for waste incineration assembled?
The Burn Plan assembly is based on:

- Available waste inventory and its chemical/physical properties;
- Permit limitations (i.e. chlorine, sulfur, halogens, metals, heat content)
- Heat content of waste blend in the kiln;
- And Waste compatibility.

How many days of operation is the Incinerator scheduled?

The unit is scheduled to maintain an OST factor greater than 85%, including one major turnaround each year to perform required maintenance. Due to installation of an RTO (regenerative thermal oxidizer) for emission control, customer deliveries are typically not impacted during outages.

17. STORAGE

Are all facility tanks certified?
A professional engineer has certified all facility tanks. Tanks are inspected and certified externally every two years and internally every five years per the permit.

Describe the tanks associated with the incinerator feed and their capacities.
Total storage volume of all tanks constructed is approximately 636,000 gallons. The following is a listing of permitted tank capacities for the incinerator.

Constructed	Permitted	Volume each gallons	Construction	Service
4	4	103,000	Above-grade, carbon steel	liquid
Tank Designations: T521,T522, T523, T524				
5	8	17,700	Above-grade, carbon steel	liquid
Tank Designations: T509, T510, T511,T512, T513, T551, T552, T553				
2	4	25,000	Above-grade, carbon steel	liquid
Tank Designations: T514,T515, T516, T550				
8	8	10,200	Above-grade, carbon steel	liquid
Tank Designations: T501,T502,T504,T505,T506,T507,T508				

What is the permitted container storage capacity?
The incinerator facility has a total storage capacity of 5299 cubic yards or 19,459-55 gallons drum equivalents. While permitted for both bulk and drum they are typically dedicated as follows.

Drum Storage by Location	**55-gallons**
Container Storage Building (CSB)	2040 equivalents
Ash Storage Building	747 equivalents
Stabilization Building	4406 equivalents
Bulk Storage by Location	**Cubic Yards**
ADA Building	720
Building 46	2500
Deepwell Building	120 – RCRA only

18. INJECTION WELL

When was the Facility Injection Well constructed and put into service?
The injection well and most of its associated surface facilities was constructed during 1981 and put into service on January 27, 1982. An additional well was permitted in 1999 that currently shares capacity with the existing well. Construction and commissioning was completed in August of 2008.

What geological formation does the well inject into?
The Facility injection wells inject into the lower Miocene sand formation some 7,205 feet below the kelly bushing.

What is the maximum injection pressure of the injection wells?
Maximum permitted surface injection pressure is 1,199 psi with a 100 psi injection pressure/annulus pressure differential. Normally, injection occurs at about 300 psi. The brine filled annulus is normally maintained at 100 psi above injection pressure.

Describe the tanks associated with the Injection Well and their capacities.
The following is a listing of RCRA permitted tank capacities for the injection well:

Number	Volume in gallons	Construction
3	302,000	Above-grade, carbon steel with interior lining
1	1,007,048	Above-grade, carbon steel with interior lining

Are any third party wastes currently accepted for injection?
While permitted for, currently no third party is being accepted.

What wastes are deep well injected at the Facility?
Scrubber blowdown; Stormwater from secondary containment; and Leachate from on-site

What is the relationship between the incineration process and deepwell injection?
The injection wells and the nearly two million gallon total tank storage capacity provides on-site scrubber blow-down management and disposal capability.

What is a No-Migration Petition (NMP) as it relates to the injection wells?
The NMP is an exemption from the RCRA Land Disposal Restrictions and consists of computer modeling demonstration to the USEPA that there will be no-migration of the hazardous waste from the permitted injection zone for as long as the waste remains hazardous. Through extensive computer modeling, the Facility has demonstrated in its NMP application that hazardous waste will not migrate from this injection zone for the next 10,000 years.

Has the No-Migration Petition (NMP) been received?
The facility received the original approval for its No-Migration Petition for the Deep-well from the USEPA on May 8, 1990. The petition was reissued December 17, 2004. This was automatically applicable to the second well.

WATER

How is water provided to the facility?
A series of surface water ponds located north of the site on Highway 73 collects rainwater that is subsequently pumped to the Water Treatment Plant for treatment. The rainwater is filtered then stored in a 750,000-gallon tank for use as process water and firewater reserve. A series of groundwater wells are also used as supplemental water supplies.

How is the water used throughout the facility?
Water is used for various purposes throughout the Veolia – Port Arthur facility and can be broken down into four groups.

- Potable water
- Boiler make-up water
- Process water
- Firewater

What treatment is involved in generating potable water?
Potable water requires flocculation, coagulation and sedimentation in a primary clarifier, filtration (rapid sand), 0.5-micron cartridge filter reverse osmosis, carbon filtration, disinfection, storage, and distribution.

What treatment is involved in generating boiler make-up water?
Boiler make-up water is used to feed two package boilers for steam generation. The method involved in generating this water requires clarification, filtration (rapid sand), reverse osmosis, and de-aeration.

What treatment is involved in generating process water and firewater?
Process water, which is primarily used for quenching of the incinerator, requires filtration prior to use. Firewater is of the same quality as process water and is stored in reserve as a means to fight and control fires.

19. FINANCIAL INFORMATION

STATEMENTS, FILINGS

Consolidated financial statements are available on the Veolia Environnement website at: www.veolia.com. For additional information, please contact Marie-Claire Camus at : www.marie-claire.camus@veolia.com

INSURANCE

What is the insurance agency providing liability coverage?

Marsh USA Inc. provides coverage to Veolia for sudden and non-sudden accidental occurrences. A copy of our insurance certificates will be provided upon request.

Summary:

- General - $5 million each occurrence
- Auto - $ 5 million
- Umbrella - $10 million
- Workers Comp - $ 1 million
- Prof. Liability - $ 5 million

CLOSURE, PRE AND POST

Irrevocable Standby Letter of Credit issued by Bank of America. 2012-2013 amount $13,000,200.79

COMMUNITY RELATIONS

How does the site maintain good community relations?

The Veolia Gulf Coast Treatment Center in Port Arthur has maintained a good relationship with the many segments of the local community. As an active participant in local industrial group meetings, and a sizable benefactor to local charities, the Port Arthur site has developed a favorable standing by doing the things that define a good corporate citizen.

An open door policy has promoted facility tours by local citizens and college/ educational groups.

19. PERMIT SUMMARY

Permit Type- Description	Issued By	Number	Expiration Date
Industrial Solid Waste and Hazardous Waste	TCEQ	HW-50212	8/20/2014
Permit Mod – Special waste from Health-care Related Facilities (i.e. medical)	TCEQ	HW-50210-001	8/20/2014
Title V Air Permit	TCEQ	O-01509	01/11/2013 In renewal status
Emission and Operating Parameters – all Emission Sources	TCEQ	NSR Air	8/20/2014
UIC Injection Wells	TCEQ	WDW-160 WDW-358	9/8/2014
No Migration Petition (UIC)	TCEQ	WDW-160 WDW-358	11/30/2018
PCB Storage /Disposal	USEPA Region 6	TSCA	11/12/2017
Stormwater, Wastewater and Utility Water Discharge	TCEQ	TPDES02417	07/01/2013
Import of Foreign Soils	USDA	S-57635	05/27/2013

Attachment 1

ACORD®

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY): 06/30/2012

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

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

PRODUCER
*Marsh USA, Inc.
Two Logan Square
Philadelphia, PA 19103-2797
Attn: veolia.certrequest@marsh.com / 212 948 5063

010056-ES-All-12-13 PORTA

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

INSURER(S) AFFORDING COVERAGE		NAIC #
INSURER A :	New Hampshire Insurance Company	23841
INSURER B :	Insurance Company Of The State Of PA	19429
INSURER C :	Commerce And Industry Ins Co	19410
INSURER D :	National Union Fire Insurance Co	19445
INSURER E :	Lexington Insurance Company	19437
INSURER F :	ACE Property And Casualty Ins Co	20699

INSURED
*Veolia ES Technical Solutions, LLC
Highway 73, 3.5 miles West of Taylor's Bayou
Port Arthur, TX 77643

COVERAGES **CERTIFICATE NUMBER:** HOU-001977317-22 **REVISION NUMBER:** 9

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

INSR LTR	TYPE OF INSURANCE	ADDL INSR	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS		
A	GENERAL LIABILITY			GL004572700 ($3m)	07/01/2012	07/01/2013	EACH OCCURRENCE	$	5,000,000
G	X COMMERCIAL GENERAL LIABILITY			CH12XENOA2P58NC ($2m XS of $3m)	07/01/2012	07/01/2013	DAMAGE TO RENTED PREMISES (Ea occurrence)	$	1,000,000
	CLAIMS-MADE X OCCUR						MED EXP (Any one person)	$	10,000
							PERSONAL & ADV INJURY	$	5,000,000
							GENERAL AGGREGATE	$	5,000,000
	GEN'L AGGREGATE LIMIT APPLIES PER: X POLICY PRO-JECT LOC						PRODUCTS - COMP/OP AGG	$	5,000,000
								$	
B	AUTOMOBILE LIABILITY			CA4576281 (AOS)	07/01/2012	07/01/2013	COMBINED SINGLE LIMIT (Ea accident)	$	5,000,000
B	X ANY AUTO			CA4576283 (VA)	07/01/2012	07/01/2013	BODILY INJURY (Per person)	$	
B	ALL OWNED AUTOS / SCHEDULED AUTOS			CA4576282 (MA)	07/01/2012	07/01/2013	BODILY INJURY (Per accident)	$	
	HIRED AUTOS / NON-OWNED AUTOS						PROPERTY DAMAGE (Per accident)	$	
								$	
F	X UMBRELLA LIAB X OCCUR			XCO G27046162	07/01/2012	07/01/2013	EACH OCCURRENCE	$	10,000,000
	EXCESS LIAB CLAIMS-MADE						AGGREGATE	$	10,000,000
	DED RETENTION $							$	
A	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY			WC6517886 (AOS)	07/01/2012	07/01/2013	X WC STATU-TORY LIMITS OTH-ER		
B	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) Y/N: N	N / A		WC1558356 (FL)	07/01/2012	07/01/2013	E.L. EACH ACCIDENT	$	1,000,000
D				WC6517888 (CA)	07/01/2012	07/01/2013	E.L. DISEASE - EA EMPLOYEE	$	1,000,000
C	If yes, describe under DESCRIPTION OF OPERATIONS below			WC6517889 (MA/WI/Stop Gap)	07/01/2012	07/01/2013	E.L. DISEASE - POLICY LIMIT	$	1,000,000
H	Prof Liability/Claims-Made			COO G24542336 001	07/01/2011	07/01/2013	Each Occurrence		5,000,000
	Contractors' Pol Occurrence			SIR $100,000			Aggregate		5,000,000

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

CERTIFICATE HOLDER

Veolia ES Technical Solutions, LLC
Highway 73, 3.5 Miles West of Taylors Bayou
Port Arthur, TX 77640

CANCELLATION

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

AUTHORIZED REPRESENTATIVE
of Marsh USA Inc.
Manashi Mukherjee Manashi Mukherjee

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AGENCY CUSTOMER ID: 010056

LOC #: Houston

ADDITIONAL REMARKS SCHEDULE

AGENCY	NAMED INSURED
*Marsh USA, Inc.	*Veolia ES Technical Solutions, LLC Highway 73, 3 5 miles West of Taylor's Bayou Port Arthur, TX 77643
POLICY NUMBER	
CARRIER / NAIC CODE	EFFECTIVE DATE:

ADDITIONAL REMARKS

THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM,

FORM NUMBER: 25 FORM TITLE: Certificate of Liability Insurance

INSURERS AFFORDING COVERAGE/NAIC #

INSURER G: Navigators Specialty Insurance Company (36056)

INSURER H: Illinois Union Insurance Company (27960)

Other

Policy Covers

Pollution Legal Liability

Claims Made

Policy Details

Insr Ltr: E (Lexington Insurance Company)

Policy Number: PLS 1364667

Eff Dt: 07/01/2010 Exp Dt: 07/01/2013

Limits

10,000,000

10,000,000

ACORD 101 (2008/01)

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Attachment 2- RCRA Permit

HAZARDOUS WASTE PERMIT NO. 50212
EPA ID. NO. TXD000838896
ISWR NO. 50212

Texas Commission on
Environmental Quality
Austin, Texas

SEP 14 2004

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

Name of Permittee:	Onyx Environmental Services, L.L.C. P.O. Box 2563 Port Arthur, TX 77643-2563
Site Owner:	Onyx Environmental Services, L.L.C. P.O. Box 2563 Port Arthur, TX 77643-2563
Registered Agent for Service:	C.T. Corporation System Republic National Bank Building Dallas, TX 75201
Classification of Site:	Hazardous industrial solid waste storage, processing and disposal, on-site/off-site, commercial

The permittee is authorized to manage wastes in accordance with limitations, requirements, and other conditions set forth herein. This permit is granted subject to the rules of the Commission and other Orders of the Commission, and laws of the State of Texas. This permit does not exempt the permittee from compliance with the Texas Clean Air Act. This permit will be valid until canceled, amended, modified or revoked by the Commission, except that the authorization to store, process and dispose of wastes shall expire midnight, 10 years after the date of renewal permit approval. This permit was originally issued on June 7, 1988.

All provisions in this permit stem from State and/or Federal authority. Those provisions marked with an asterisk (*) stem from Federal authority and will implement the applicable requirements of the Hazardous and Solid Waste Amendments of 1984 (HSWA) for which the Texas Commission on Environmental Quality (TCEQ) has not been authorized.

ISSUED: AUG 20 2004

For The Commission

TCEQ-0080 (Rev. 10-09-03)

Attachment 3 – TSCA Permit

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

DEC 0 6 2012

RECEIVED
DEC 17 2012

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Mr. Mitch Osborne
General Manager
Veolia Environmental Services
P.O. Box 2563
Port Arthur, Texas 77643

RE: United States Environmental Protection Agency (EPA) Region 6 Re-authorization of Veolia Environmental Services (Veolia) for Commercial Storage and Disposal of Polychlorinated Biphenyls (PCBs) at its Facility Located at Port Arthur, TX; EPA ID TXD000838896.

Dear Mr. Osborne:

The United States Environmental Protection Agency (EPA) Region 6 hereby re-authorizes the Veolia Port Arthur, Texas facility for commercial storage and disposal of PCBs by incineration subject to the enclosed Conditions of Approval. A Public Notice of our proposal to re-authorize Veolia was published in the Port Arthur News on September 28, 2012, which opened a 45 day comment period. No comments were received during the comment period which closed on November 12, 2012.

After reviewing all the relevant information, EPA Region 6 has determined that PCB disposal units and commercial storage areas authorized in this approval meet all of the applicable requirements under 40 CFR Part 761, Subpart C (Marking of PCBs and PCB Items), Subpart D (Storage and Disposal), Subpart J (General Records and Reports), and Subpart K (PCB Waste Disposal Records and Reports). Also, EPA concludes that operation of the authorized PCB units and areas in compliance with the enclosed Conditions of Approval will not result in an unreasonable risk to human health and environment from PCBs.

A violation of 40 CFR Part 761, or any condition included as part of the approval, may subject Veolia to an enforcement action under TSCA and/or other applicable laws and regulations. Such action could result in termination, revocation, or modification of this approval. Furthermore, receipt of evidence that: (1) a mis-representation of any material fact has been made in any submittal; (2) all relevant facts have not been disclosed; or (3) the nature of PCB disposal has substantially changed from the submitted application after the effective date of this approval may constitute sufficient cause for termination, revocation or modification of this approval.

Internet Address (URL) • http://www.epa.gov
Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 25% Postconsumer)

Attachment 4 – Title 5 (in renewal status)

FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO

Veolia E.S. Technical Solutions, L.L.C.

AUTHORIZING THE OPERATION OF

Port Arthur Facility
Refuse Systems

LOCATED AT

Jefferson County, Texas

LATITUDE 29° 51' 11" LONGITUDE 094° 5' 43"

Regulated Entity Number: RN102599719

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

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

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

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

Permit No: O1509 Issuance Date: January 11, 2008

For the Commission

Attachment 6 – Medical Waste

Kathleen Hartnett White, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
Larry R. Soward, *Commissioner*
Glenn Shankle, *Executive Director*

RECEIVED
MAY 19 2006
ONYX

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 15, 2006

Mr. Daniel J. Duncan
Environmental, Health and Safety Manager
Onyx Environmental Services, L.L.C.
P.O. Box 2563
Port Arthur, TX 77643-2563

7004 1350 0000 4763 5917
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: Transmittal of Class 1[1] Permit Modification
Onyx Environmental Services, L.L.C.- Port Arthur, Jefferson County
Hazardous Waste Permit No. 50212
Industrial Solid Waste Registration No. 50212
EPA Identification No. TXD000838896
WWC11263849-1 and 11263849; CN 600130835/RN 102599719

Dear Mr. Duncan:

The Texas Commission on Environmental Quality (TCEQ) has reviewed your application for a Class 1[1] modification submitted February 13, 2006, and dated February 8, 2006, with revision dated April 12, 2006, requesting revisions to the permit to remove the prohibition for the management of Special Waste from Health Care-Related Facilities (SWHCRF) as defined in Title 25 Texas Administrative Code (TAC) §1.132 and Title 30 TAC §330.2 and §113.2070. The application indicates that the facility will operate as a co-fired combustor/incinerator as defined in 30 TAC §113.2070(6). In addition, the application indicates that the facility will not be seeking authorization to store SWHCRF as defined in 30 TAC §330.1009, but intends to process these wastes within 72 hours of receipt. Please note, that removal of the prohibition for SWHCRF in Provision IV.B.3.g. of Permit No. 50212 should not be construed as authorization to conduct any activities which are subject to regulation under rules or regulations not incorporated by Provision II.C. of Permit No. 50212. Copies of the Class 1[1] application, as revised on April 12, 2006, were forwarded to the TCEQ Air Permits Division and the TCEQ Municipal Solid Waste Section.

Our evaluation indicates that the information presented is sufficient for a Class 1[1] permit modification. Transmitted herewith is the modification which is now part of your permit and should be attached thereto. Please note that notice of this modification request must be made as per the requirements of 30 TAC §39.403 and 305.69(b)(1)(B) within 90 days after approval of the change.

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000 • Internet address: www.tceq.state.tx.us