Maryland Department of the Environment

Solid Waste Program

Materials Related to Draft Controlled Hazardous Substance (CHS) Permit

Maryland
Department of
the Environment

CHS PERMIT A-312
EPA ID No. MDR000527703

Permittee:	**EQ Northeast, Inc** **185 Industrial Road** **Wrentham, Massachusetts 02093**
Facility Location:	**1321 Joh Avenue** **Baltimore, MD 21227**

Materials Related to a Draft Controlled Hazardous Substance (CHS) Permit

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Public Notice of Tentative Determination – Opportunity for Public Comment and Opportunity to Request a Public Hearing

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MARYLAND DEPARTMENT OF THE ENVIRONMENT
LAND AND MATERIALS ADMINISTRATION

NOTICE OF TENTATIVE DETERMINATION

OPPORTUNITY FOR PUBLIC COMMENT AND OPPORTUNITY TO REQUEST A PUBLIC HEARING

ISSUE DATES: March 11 and March 18, 2022

The Land and Materials Administration of the Maryland Department of the Environment (MDE) has completed the review of an application for a Control Hazardous Substance (CHS) facility permit. The permit would authorize EQ Northeast, Inc. of Wrentham, Massachusetts to operate a CHS transfer facility at 1321 Joh Avenue, Baltimore, MD 21227. This notice provides additional information about the draft CHS permit, and describes opportunities for public review and comment on the permit.

BACKGROUND

MDE received the application for the permit on August 27, 2020. The applicant submitted additional information on March 26 and April 23, 2021, and January 21, 2022 in response to comments made by MDE.

Based upon the application meeting all applicable regulations, MDE has made a tentative determination to issue the permit and, accordingly, has prepared a draft permit that MDE proposes to issue to the applicant. The permit establishes conditions on facility operations in conformance with Code of Maryland Regulations (COMAR) 26.13. The draft permit includes Standard Conditions, General Facility Conditions, and Special Conditions for truck-to-truck transfer of in-transit containers of hazardous waste. A given container would be on-site for no more than 10 days.

OPPORTUNITIES FOR PUBLIC REVIEW AND COMMENT

The permit application, a fact sheet, and the draft permit are on file at MDE's offices and may reviewed during normal business hours upon appointment. Contact information for the purpose of scheduling an appointment appears at the end of this notice. Copies of documents may be obtained at a reasonable charge. The draft permit and related information are also available for review at the Lansdowne Branch of the Baltimore County Library, 500 3rd Avenue, Lansdowne, Maryland 21227.

The draft permit and fact sheet will be posted on MDE's website. These documents will be available from a link under the heading "Are there any proposed actions currently open for public comment?" at <https://mde.maryland.gov/programs/land/HazardousWaste/Pages/index.aspx>.

All persons, including the permit applicant, who believe that any condition of the draft permit is inappropriate or that the Department's tentative decision to prepare a draft permit is inappropriate, shall raise all reasonably ascertainable issues and submit all reasonably available arguments and factual grounds supporting their position, including all supporting material, by the close of the public comment period. Comments shall be submitted in writing.

Written comments on the Department's tentative determination will be accepted until the close of business on April 25, 2022 and should be addressed to: Ms. Kaley Laleker, Director, Land and Materials Administration, 1800 Washington Boulevard, Suite 610, Baltimore, Maryland 21230-1719.

Any supporting material which accompanies correspondence must be included in its entirety and may not be incorporated by reference, unless it is already part of the administrative record in this proceeding, or it consists of State or Federal statutes and regulations, U.S. Environmental Protection Agency (EPA) documents of general applicability, or other generally available materials. Commenters must make supporting material not already included in the administrative record available to the Director.

OPPORTUNITY TO REQUEST A PUBLIC HEARING

During the public comment period, any interested person may request a hearing on this matter. A request for a public hearing shall be in writing, and shall state the nature of the issues proposed to be raised in the hearing. Requests for a public hearing should be addressed to: Ms. Kaley Laleker, Director, Land and Materials Administration, 1800 Washington Boulevard, Suite 610, Baltimore, Maryland 21230-1719 and will be accepted until the close of business on April 25, 2022.

For further information regarding this notice or to schedule an appointment to review the administrative record, contact Mr. Edward Hammerberg at (410) 537-3315, or <ed.hammerberg@maryland.gov>.

Fact Sheet

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FACT SHEET FOR DRAFT PERMIT

This Fact Sheet has been developed for a Controlled Hazardous Substance (CHS) Permit that the Maryland Department of the Environment (MDE) Land and Materials Administration (LMA) is proposing to issue to:

EQ Northeast (EQNE)
1321 Joh Avenue
Baltimore, Maryland 21227

The permit would authorize direct truck-to-truck transfer of in-transit containers of hazardous waste. Transfers would be made without opening the containers. The hazardous waste handled at the facility is en route to a final destination for recycling, treatment, or disposal. This fact sheet was prepared in accordance with the requirements of Code of Maryland Regulations (COMAR) 26.13.07.20E.

A. Purpose of the Permitting Process

The purpose of the permitting process is to afford the LMA, interested citizens, and other governmental agencies the opportunity to evaluate the ability of the applicant to comply with the applicable hazardous waste management requirements promulgated under the Environment Article, Annotated Code of Maryland §7-201 through §7-268, prior to operation of the facility. The applicant's ability is re-evaluated whenever the LMA receives an application for renewal of, or a major modification to, an existing permit.

The LMA is required to prepare a draft permit which sets forth in one concise document all the applicable requirements with which the agency requires the applicant to comply during the ten-year duration of the permit.

B. Permitting Procedures

The following is an outline of the sequential permitting process as required by Maryland's Environment Article

1. The LMA receives an application for a CHS permit. It publishes a notice twice in two consecutive weeks at the applicant's expense informing the public of the receipt of the application, and the availability of the application material for public review. The notice also offers an opportunity for anyone to request an informational meeting.

2. An informational meeting is held if requested by the public or if the LMA, at its discretion, deems that such a meeting will be beneficial. The LMA will publish a notice of the informational meeting at the applicant's expense, if it is not included in the earlier notice of application received. The LMA requires the applicant to attend the meeting or the permit may be denied.

3. Following a detailed evaluation of the permit application, the LMA prepares a tentative determination. This will include a proposal to issue or deny the permit and an explanation of the proposed action. If the tentative determination is to issue a permit, a draft permit is prepared.

4. The LMA issues a notice at the applicant's expense informing the public of the tentative determination, allowing citizens 45 days to provide comments or to request a public hearing. The LMA may schedule a public hearing at this stage and include an announcement of it in this public notice. The public hearing provides a means for citizens to comment on the tentative determination in a public forum. Alternatively, persons may choose to submit their comments in writing to the LMA before the end of the comment period. As a matter of policy, the LMA requires applicants to attend public hearings or the permit may be denied.

5. The LMA prepares a final determination if comments opposing the tentative determination are received during public comment period or the public hearing, or if the LMA intends to make a final determination that is "substantively different" from the tentative determination. Otherwise, the publicized tentative determination becomes a final decision. The notice of final determination is advertised twice - once per week in two consecutive weeks. The final determination notice will include information on appeal procedures.

C. Action by the Maryland Department of the Environment (the Department)

The Department is issuing a notice of tentative determination to renew the APG permit. Written comments on the tentative determination or requests for a public hearing will be accepted until the close of business on **April 25, 2022**, and should be addressed to Ms. Kaley Laleker, Director, Land and Materials Administration, Maryland Department of the Environment, 1800 Washington Blvd., Suite 610, Baltimore, MD 21230-1719.

The EQNE application, the draft permit, and other pertinent information relating to the LMA's tentative determination are on file at the offices of

Solid Waste Program
Land and Materials Administration
Maryland Department of the Environment
1800 Washington Blvd., Suite 605
Baltimore, MD 21230-1719

A copy of the draft permit is also available for public review on the Maryland Department of the Environment's website from a link under the heading "Are there any proposed actions currently open for public comment?" at <https://mde.maryland.gov/programs/land/HazardousWaste/Pages/index.aspx>.

In addition, a copy of the draft permit is available for public review at the Lansdowne Branch of the Baltimore County Library, 500 3rd Avenue, Lansdowne, Maryland 21227.

To obtain more information or to make an appointment to review the documents at the Department, interested parties may contact Mr. Albert Simkins, Project Engineer at (410) 537-3315 or <albert.simkins@maryland.gov>. Arrangements can be made for obtaining copies of the documents at a reasonable cost.

D. Facility Description

EQNE consolidates small loads from vehicles servicing hazardous waste generators into large loads for efficient long-distance shipments to final destinations for treatment, recycling, or disposal. There is not any waste treatment on site. The maximum amount of waste that may be in storage at any given time is 19,800 gallons. This is equivalent to approximately 396 55-gallon drums. A given container of waste may be on site for no more than 10 days.

Transfer operations are conducted in a warehouse building. Arriving trucks are unloaded at two docks on the east side of a warehouse building. Off-loaded containers are transferred to outbound trucks or trailers at three docks on the west side of the building.

Generally, closed containers are unloaded from arriving trucks and moved directly to the transfer truck or trailer. The unloading and transfer operations are accomplished using drum dollies, pallet jacks, or other mechanical devices. As part of the process, facility personnel evaluate each container before, during, and after transfer to check for proper closure, proper UN rating, and general condition.

The permit would authorize use of a small interior container storage area. The storage area would allow containers to be stored pending loading onto an outbound truck or trailer. The interior storage area has approximate dimensions of 10 feet by 11 feet. It would be surrounded by a 4-inch high berm that provides approximately 250 gallons of secondary containment capacity in the event of container leakage.

E. Permit Organization

The permit is divided into four parts and eight attachments as described below:

Section	Topic
Part I	Standard Conditions
Part II	General Facility Conditions
Part III	Special Conditions for Truck-to-Truck Transfer
Part IV	List of Attachments, Signature

Parts I and II contain conditions that generally apply to all hazardous waste facilities. Part III pertains specifically to the truck-to-truck transfer of waste. Part IV is a list of attachments that are included with the permit and a signature line to be completed if the permit is issued. The attachments present detailed, facility-specific information from the permit application, and are considered an enforceable part of the permit. The attachments are as follows:

Attachment 1	Waste Analysis Plan
Attachment 2	Procedures to Prevent Hazards
Attachment 3	Personnel Training
Attachment 4	Contingency Plan
Attachment 5	Closure Plan
Attachment 6	Process Information
Attachment 7	Facility Description
Attachment 8	Permit Application Part A

F. Summary of the Permit Conditions

This section of the fact sheet presents tables for Parts I-III of the draft permit that summarize the conditions in the draft permit. The regulatory authority for each Permit Condition is specified in the column titled “Regulation”. All citations refer to regulations as codified in Title 26, Subtitle 13 of the Code of Maryland Regulations (COMAR 26.13), unless otherwise specified. The column titled "Permit Attachments" in the tables addressing Parts II and III specify where in the permit attachments additional details on facility operations of each Permit Condition can be found. This section of the fact sheet also includes a table that lists the permit attachments and identifies the sections of the permit application that served as the source for the attachment information.

(Fact sheet continues on next page)

PART I
STANDARD CONDITIONS

Part I of the permit sets forth the standard procedural conditions that are applicable to all hazardous waste management facilities.

Permit Condition	Subject	Regulation COMAR 26.13
I.A	Effect of Permit	07.09
I.B	Permit Actions	07.11 & .12
I.C	Severability	07.05
I.D	Definitions	01.03, 02.02 and 02.03
I.E	Signatory Requirements	07.02B, 07.03 & 07.04L
I.F.	Documents to be maintained at the Facility	
I.F.1	Waste Analysis Plan	05.02D
I.F.2	Procedures to Prevent Hazards	05.02E, 05.02F and 05.03
I.F.3	Inspection Schedules and Logs	05.02F(2) and (4)
I.F.4	Personnel Training	05.02G(4) and G(5)
I.F.5	Contingency Plan	05.04
I.F.6	Closure Plan	05.07
I.F.7	Operating Record	05.05D
I.F.8	Copy of Current Version of COMAR	07.05A
I.F.9	Copy of the Permit and Permit Application	07.05A
I.F.10	Other Documents	.07.05
I.G.	Duties and Requirements	
I.G.1	Duty to Comply	07.04B
I.G.2	Duty to Reapply	07.04C
I.G.3	Pernit Expiration	(State Government Article, Annotated Code of MD §10-226(b))
I.G.4	Need to Halt or Reduce Activity Not a Defense	07.04D

Permit Condition	Subject	Regulation COMAR 26.13
I.G.5	Duty to Mitigate	07.04E
I.G.6	Proper Operation and Maintenance	07.04F
I.G.7	Duty to Provide Information	07.04I
I.G.8	Inspection and Entry	07.04J
I.G.9	Monitoring and Records	05.05E(2) and 07.04K
I.G.10	Reporting Planned Changes	07.04M(1) and (2)
I.G.11	Transfer of Permit	07.04M(3), 07.10 and 05.02C(2)
I.G.12	Notification	07.04M(6), 07.15D, 05.04G(4) and (10)
I.G.13	Anticipated Non-Compliance	07.04M(2)
I.G.14	Other Non-compliance	07.04M(7)
I.G.15	Other Information	07.04M(8)
I.H	Certification of Construction or Modification	07.15C
I.I	Permit Fee	07.21
I.J	Compliance Schedules	07.04M(5) and 07.07D

PART II
GENERAL FACILITY CONDITIONS

Part II of the permit sets forth general conditions for this facility with which EQNE must comply.

Permit Condition	Subject	Regulation COMAR 26.13.	Permit Attachment
II.A	Design and Operation of Facility	05.03B	6 and 7
II.B	General Waste Analysis	05.02D	1
II.C	General Inspection Requirements	05.02F	2
II.D	Personnel Training	05.02G	3
II.E	Preparedness and Prevention	05.03	2 and 7
II.F	Contingency Plan	05.04	4

Permit Condition	Subject	Regulation COMAR 26.13.	Permit Attachment
II.G	Record Keeping and Reporting	05.05D, E, F and H	2 – 4
II.H	Closure Requirements	05.07	5
II.I	Cost Estimate Facility Closure	05.08	5
II.J	Financial Requirements	05.08	5
II.K	Liability Requirements	05.08	—
II.L	Incapacity of Owner/Operator, Guarantors, or Financial Institutions	05.08	—
II.M	General Requirements for Ignitable, Reactive or Incompatible Wastes	05.02H	2
II.N	Security	05.02E	2
II.O	Manifest System	05.05B,C & G	—
II.P	Floodplain Standard	05.02-1B, and 07.02D(26) and (27)	6
II.Q	Waste Minimization/Source Reduction	05.05F(4)(j) and (k); and 05.05D(2)(i)	—

PART III - SPECIAL CONDITIONS FOR TRUCK-TO-TRUCK TRANSFER

Part III of the permit sets forth specific conditions with which EQNE must comply.

Permit Condition	Subject	Regulation COMAR 26.13.	Permit Attachment
III.A	General Provisions	04.01E, 05.05, 05.09, 07.01	(All)
III.B	Container Transfer and Staging Areas and Capacities	04.01E and 05.09H	6 and 7
III.C	Permitted and Prohibited Waste Identification	05.02D, 05.05D, 07.02.D(14), and 07.05	7

Permit Condition	Subject	Regulation COMAR 26.13.	Permit Attachment
III.D	Operating Conditions	04.01E, 05.02H(1), 05.09(D) and 05.09F	6, 7
III.E	Certification of Construction or Modification	07.15C	–
III.F	Condition of Containers	05.09B	2
III.G	Compatibility of Waste with Containers	05.09C	7
III.H	Management of Containers	05.09D	7
III.I	Containment Systems	05.09H	7
III.J	Inspection Schedules and Procedures	05.09E	2
III.K	Record Keeping	03.06, 05.05D, 05.05E, and 05.20	—
III.L	Closure	05.07F, 05.09I	5

PART IV
ATTACHMENTS

Permit Attachments 1 to 8 include sections of EQNE's permit renewal application and are an enforceable part of this permit. The following table cross-references these Permit Attachments to the sections in the application from which the attachment information was obtained.

Attachment Number	Title	Application Section
1	Waste Analysis Plan	Section C
2	Procedures to Prevent Hazards	Section D
3	Personnel Training	Section E
4	Contingency Plan	Section F
5	Closure Plan	Section G
6	Process Information	Section B
7	Facility Description	Section A
8	Permit Application Part A	Section H

Draft Permit

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Maryland Department of the Environment

Solid Waste Program

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Controlled Hazardous Substance (CHS) Permit

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CHS PERMIT A-312
EPA ID No. MDR000527703

Permittee:	**EQ Northeast, Inc** **185 Industrial Road** **Wrentham, Massachusetts 02093**
Facility Location:	**1321 Joh Avenue** **Baltimore, MD 21227**

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MARYLAND DEPARTMENT OF THE ENVIRONMENT
Solid Waste Program
Controlled Hazardous Substance Permit

Permit Number A-312
EQ Northeast, Inc
Baltimore, Maryland

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ATTACHMENTS

MARYLAND DEPARTMENT OF THE ENVIRONMENT

Solid Waste Program

Controlled Hazardous Substance Permit A-312

OVERVIEW

This permit establishes conditions under which EQ Northeast, Inc. (EQNE) may operate a hazardous waste transfer facility The permit implements requirements of Title 26, Subtitle 13 of the Code of Maryland Regulations (COMAR) 26.13.

EQNE has requested permission to conduct truck-to-truck transfer of containers of hazardous waste at its facility located at 1321 Joh Avenue, Baltimore, Maryland 21227. The purpose of the container transfer is to consolidate small loads from vehicles servicing hazardous waste generators into large loads for efficient long-distance shipments to final destinations for treatment, recycling, or disposal. In accordance with Section 7-252 (a)(6) of the Environment Article, Annotated Code of Maryland, this activity may only be conducted in a controlled hazardous substance facility.

This permit authorizes EQNE to conduct truck-to-truck transfer of containers of hazardous waste, without opening the containers. Truck-to-truck transfer may include moving drums directly from a truck (such as a box truck) into a trailer, where, for example, the truck backs up directly to the trailer. Truck-to-truck transfer may also include moving drums from a box truck through the warehouse garage door into a trailer. Under the permit, EQNE may manage up to a maximum of 20,800-gallons of hazardous waste at one time on site for truck-to-truck transfer. This is equivalent to 418 standard 55-gallon drums assuming each drum contains no more than 50 gallons of waste. EQNE is not expected to have the maximum amount routinely on site. A given container of hazardous waste may remain on-site for up to 10 days.

The permit requires that EQNE conduct truck-to-truck transfer operations under carefully controlled conditions and in a secure, contained area using specifically trained personnel. EQNE is also required to maintain contingency plans and financial assurance instruments in accordance with the permit conditions.

CONTROLLED HAZARDOUS SUBSTANCE
FACILITY PERMIT

Permit Number: **A-312**

EPA ID Number: **MDR000527703**

Effective Date:

Expiration Date:

DRAFT

Pursuant to the Provisions of Environment Article, §7-232, Annotated Code of Maryland, and regulations promulgated thereunder, the Maryland Department of the Environment, Land and Materials Administration, (the Department) hereby authorizes

EQ Northeast, Inc.
185 Industrial Road
Wrentham, Massachusetts 02093

hereinafter referred to as "the Permittee" to operate a controlled hazardous substance transfer facility located at:

1321 Joh Avenue,
Baltimore, Maryland 21227

in accordance with the following standard, general, and special conditions including the attachments made part hereof, and the provisions of Code of Maryland Regulations (COMAR) 26.13, Disposal of Controlled Hazardous Substances.

The geographic location of the EQ Northeast, Inc hazardous waste transfer facility governed by this permit is 39°15'35" North Latitude and 76°40'01" West Longitude.

This permit is based on the assumption that the information submitted in the permit application received by the Department on August 27, 2020, and its revisions and amendments, received March 26, 2021, April 23, 2021, and January 21, 2022 (hereafter referred to as the

application) is accurate and that the facility will be operated as specified in the application. Any inaccuracies found in this information may be grounds for possible enforcement action, and

1. Modification of the permit in accordance with COMAR 26.13.07.11 (Modification, Withdrawal, or Revocation and Reissuance of Permit); or

2. Termination of the permit in accordance with COMAR 26.13.07.12 (Termination of Permits).

The Permittee shall inform the Department of any deviation from or changes in the information submitted in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

PERMIT CONTINUES ON PAGE 3

PART I
STANDARD CONDITIONS

I.A. EFFECT OF PERMIT

The Permittee is allowed to manage hazardous waste in accordance with the conditions of this permit. Any management of hazardous waste not authorized in this permit is prohibited except as otherwise authorized by COMAR 26.13. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local laws or regulations. Compliance with the terms and conditions of this permit does not constitute a defense to any action brought under Section 7003 of the Resource Conservation and Recovery Act (RCRA) (42 USC §6973), Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 USC §9606(a) commonly known as CERCLA), or any other law governing protection of public health or the environment.

I.B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for cause as specified in COMAR 26.13.07.11 and .12. The filing of a request for a permit modification, revocation and re-issuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay the applicability or enforceability of any permit conditions.

I.C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

I.D. DEFINITIONS

For the purpose of this permit, terms used herein shall have the same meaning as those in COMAR 26.13 unless this permit specifically states otherwise; where terms are not otherwise defined, the meaning associated with such terms shall be as defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

I.E. SIGNATORY REQUIREMENTS

All permit applications (including requests for permit modifications), reports or other information requested by the Department shall be signed and certified as required by COMAR 26.13.07.02B, 07.03 and 07.04L.

I.F. DOCUMENTS TO BE MAINTAINED AT THE FACILITY SITE

The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions, and modification to these documents.

I.F.1. Waste analysis plan required by COMAR 26.13.05.02D and this permit. (Permit Attachment 1);

I.F.2. Procedures to Prevent Hazards required by COMAR 26.13.05.02E, .02F, .03, and this permit. (Permit Attachment 2);

I.F.3. Inspection schedules and logs required by COMAR 26.13.05.02F(2) and (4) and this permit. (Permit Attachment 2);

I.F.4. Personnel training documents and records required by COMAR 26.13.05.02G(4) and (5) and this permit. (Permit Attachment 3);

I.F.5. Contingency Plan required by COMAR 26.13.05.04 and this permit. (Permit Attachment 4);

I.F.6. Closure Plan required by COMAR 26.13.05.07 and this permit. (Permit Attachment 5);

I.F.7. Operating record required by COMAR 26.13.05.05D and this permit;

I.F.8. A copy of COMAR 26.13 and its updates;

I.F.9. A complete copy of this permit and its attachments, and the application as defined on page 1 of this permit; and

I.F.10. All other documents required by subsequent parts of this permit.

I.G. DUTIES AND REQUIREMENTS

I.G.1. Duty to Comply. The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any other permit noncompliance constitutes a violation of COMAR and is grounds for enforcement action, permit termination, revocation and re-issuance, modification, or denial of a permit renewal application. (COMAR 26.13.07.04B)

I.G.2. Duty to Reapply. If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee shall submit a complete application for a new permit at least 180 days before this permit expires, in accordance with COMAR 26.13.07.04C.

I.G.3. Permit Expiration. This permit and all conditions therein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely complete application and, through no fault of the Permittee, the Department has not taken final action on the application (State Government Article, §10-226(b), Annotated Code of Maryland).

I.G.4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action to argue that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (COMAR 26.13.07.04D)

I.G.5. Duty to Mitigate. In the event of noncompliance with the permit, the Permittee shall:

I.G.5.a. Take all reasonable steps to minimize releases to the environment; and

I.G.5.b. Carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment (COMAR 26.13.07.04E).

I.G.6. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to maintain compliance with the conditions of this permit (COMAR 26.13.07.04F).

I.G.7. Duty to Provide Information. The Permittee shall furnish to the Department, within a reasonable time, any relevant information which the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with the permit. The Permittee shall also furnish to the Department, upon request, copies of records required to be kept by this permit (COMAR 26.13.07.04I).

I.G.8. Inspection and Entry. The Permittee shall allow the Department, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:

I.G.8.a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;

I.G.8.b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

I.G.8.c. Inspect at reasonable times any facility, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

I.G.8.d. Sample or monitor any substances or parameters at any location, at reasonable times, for the purpose of assuring permit compliance or as otherwise authorized (COMAR 26.13.07.04J).

I.G.9. Monitoring and Records.

I.G.9.a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from COMAR 26.13.02.20 or an equivalent method approved by the Department. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (SW-846, 3rd ed.), Standard Methods for the Examination of Water and Wastewater (22nd ed., 2012) or an equivalent method as specified in the attached Waste Analysis Plan, Permit Attachment 1 (Section 3 of the Permit Application) (COMAR 26.13.07.04K(1)).

I.G.9.b. The Permittee shall retain records of all monitoring information, including all maintenance records and copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least three (3) years from the date of the sample, measurement, report, and record. These periods may be extended by request of the Department at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility (COMAR 26.13.05.05E(2) and 26.13.07.04K(2)).

I.G.9.c. Records of monitoring information shall specify:

1) The dates, the exact place, and times of sampling or measurements;

2) The individuals who performed the sampling or measurements;

3) The dates the analyses were performed;

4) The individuals who performed the analyses;

5) The analytical techniques or methods used; and

6) The results of such analyses (COMAR 26.13.07.04K(3)).

I.G.10. Reporting Planned Changes. The Permittee shall give notice to the Department as soon as possible of any planned physical alterations or additions to the permitted facility or any planned alterations to the permitted activity. This notice must include a description of all incidents of noncompliance reasonably expected to result from the proposed changes. (COMAR 26.13.07.04M(1) and M (2)).

I.G.11. Transfer of Permit. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to COMAR 26.13.07.10. Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of COMAR 26.13 and provide the new owner with a copy of this permit (COMAR 26.13.07.04M(3), 26.13.07.10, and 26.13.05.02C(2)).

I.G.12. Notification.

I.G.12.a. The Permittee shall report to the Department any noncompliance, which may endanger health or the environment, orally within 24 hours and in writing within 5 days from the time the Permittee becomes aware of the circumstances (COMAR 26.13.07.04M(6)).

I.G.12.b. Oral and written reports required by Permit Condition I.G.12.a shall include the following:

1) Information concerning release of any hazardous waste that may endanger a public drinking water supply source; and

2) Any information of a release or discharge of hazardous waste, or of a fire or explosion at the facility which could threaten human health or the environment outside the facility, with the description of the occurrence and its cause including:

i) The name, address, and telephone number of the owner or operator;

ii) The name, address, and telephone number of facility;

iii) The date, time, and type of incident (for example, a release, fire or explosion);

iv) The name and quantity of each material involved;

v) The extent of injuries, if any;

vi) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and

vii) The estimated quantity and disposition of recovered material that resulted from the incident (COMAR 26.13.07.15D).

I.G.12.c. In addition to the information required by Permit Condition I.G.12.b, the Permittee shall include in the written report of noncompliance required by Permit Condition I.G.12.a:

1) A description of the noncompliance and its cause;

2) The period of noncompliance, including exact dates and times, and if the noncompliance has been corrected or the anticipated time it is expected to continue; and

3) Steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance (COMAR 26.13.07.04M(6)).

I.G.12.d. The Permittee may submit the written report required by Permit Condition I.G.12.a within 15 days of becoming aware of the circumstances requiring notification, if the Department approves the later deadline (COMAR 26.13.07.15D(2)(g)).

I.G.12.e. If the Permittee determines that the facility has had a release, fire or explosion which could threaten human health, or the environment, outside the facility, or, if the release exceeds the Reportable Quantities set forth in COMAR 26.13.05.04G(4), the Permittee shall immediately notify:

1) the local designated on-scene coordinator, if any;

2) the National Response Center at (800) 424-8802;

3) the Department's Solid Waste Program, Compliance Division at (410) 537-3315, during working hours;

4) the Department's Emergency Response Division at 1-866-633-4686;

5) Baltimore City Fire Department, Baltimore City Emergency Communications Center, by dialing 911;

6) the Baltimore Police Department, Southwest District, by dialing 911; and

7) other appropriate local authorities, if the facility's Emergency Coordinator determines that evacuation of local areas may be advisable. (COMAR 26.13.05.04G(4)).

I.G.12.f. In the oral notification report required by Permit Condition I.G.12.e, the Permittee shall include:

1) The name and telephone number of reporter;

2) The name and address of the facility;

3) The time and type of incident (for example release, fire or explosion);

4) The name and quantity of materials involved, to the extent known;

5) The extent of injuries, if any; and

6) The possible hazards to human health, or the environment, outside the facility. (COMAR 26.13.05.04G(4)(b)).

I.G.12.g.If an incident occurs which requires the Permittee to implement the Emergency Procedures/Contingency Plan of Permit Attachment 6, the Permittee shall make a written submission to the Department within 15 days of the incident (COMAR 26.13.05.04 G(10)). This submission shall include the information items (i) through (vii) listed under Permit Condition I.G.12.b(2).

I.G.13. Anticipated Non-compliance. The Permittee shall give advance notice to the Department of any planned changes in the permitted facility or activity which may result in non-compliance with the permit (COMAR 26.13.07.04M(2)).

I.G.14. Other Non-compliance. The Permittee shall report other instances of noncompliance not otherwise required to be reported by Part I of this permit at the time monitoring reports are submitted. The reports shall contain the information listed in Permit Condition I.G.12.c (COMAR 26.13.07.04M(7)).

I.G.15. Other Information. Whenever the Permittee becomes aware that the Permittee failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Department, the Permittee shall promptly submit such facts or information to the Department and state the reason for the omission or inaccuracy (COMAR 26.13.07.04M(8)).

I.H. CERTIFICATION OF CONSTRUCTION OR MODIFICATION

The Permittee may not manage hazardous waste at a new facility or a modified portion of the facility until:

I.H.1. The Permittee has submitted to the Department, by certified mail or hand delivery, a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with this permit; and

I.H.2. Either:

I.H.2.a. The Department has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of this permit; or

I.H.2.b. Within 15 days of the date of the submission of the letter required by Permit Condition I.H.1, the Permittee has not received notice from the Department of the Department's intent to conduct the inspection described in Permit Condition I.H.2.a (COMAR 26.13.07.15C).

I.I. PERMIT FEE

Payment of the permit fee for this facility is a prerequisite to issuing this permit. Failure to pay the permit fee in a timely manner constitutes grounds for permit revocation. As specified in COMAR 26.13.07.21, the permit fee is based on the size of the facility, nature and quantity of CHS, and the anticipated costs of regulatory activities such as permit preparation, inspections, monitoring, and program development. During the existence of this permit, the permit fee is $12,185.18 per year, in addition to the cost of public notices. An application fee, if submitted with the permit application, will be credited towards the first year's annual permit fee.

I.J. COMPLIANCE SCHEDULES

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each deadline specified in the compliance schedule (COMAR 26.13.07.04M(5) and 26.13.07.07D).

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PART II
GENERAL FACILITY CONDITIONS

II.A. DESIGN AND OPERATION OF FACILITY

The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste constituents to air, soil, surface water or ground-water which could threaten human health or the environment.

II.B. GENERAL WASTE ANALYSIS

The Permittee shall follow the procedures described in the attached Waste Analysis Plan, Permit Attachment 1 (Section C of the Permit Application). The Permittee shall verify its waste analysis as part of its quality assurance program, in accordance with current EPA practices (Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846, 3rd ed.) or equivalent methods approved by the Department; and at a minimum, maintain proper functional instruments, use approved sampling and analytical methods, verify the validity of sampling and analytical procedures, and perform correct calculations. If the Permittee uses a contract laboratory to perform analyses, then the Permittee shall inform the laboratory in writing that the contract laboratory must operate under the waste analysis conditions set forth in this permit.

II.C. GENERAL INSPECTION REQUIREMENTS

The Permittee shall comply with COMAR 26.13.05.02F and shall follow the Inspection Schedule, as described in Permit Attachment 2 (Section D and Figures 4A, B, C, E, F, and H of the Permit Application). The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by COMAR 26.13.05.02F(3). Records of inspections shall be kept as required by COMAR 26.13.05.02F(4).

II.D. PERSONNEL TRAINING

The Permittee shall conduct personnel training as required by COMAR 26.13.05.02G. This Training Program shall follow the Training Plan, Permit Attachment 3 (Section E and Figure 5A of the Permit Application). The Permittee shall maintain documents and records as required by COMAR 26.13.05.02G(4) and (5).

II.E. PREPAREDNESS AND PREVENTION

II.E.1. Required Equipment. At a minimum, the Permittee shall equip the facility with the equipment set forth in Contingency Plan, Permit Attachment 4 (Section F of the Permit Application), as required by COMAR 26.13.05.03 and 04.

II.E.2. Testing and Maintenance of Equipment. The Permittee shall test and maintain the equipment specified in Permit Condition II.E.1, as necessary, to assure its proper operation in time of emergency, as required by COMAR 26.13.05.03D.

II.E.3. Access to Communications or Alarm System. The Permittee shall maintain access to the communications or alarm system as required by COMAR 26.13.05.03E.

II.E.4. Arrangements with Local Authorities. The Permittee shall maintain arrangements with local authorities as required by COMAR 26.13.05.03H. If local officials refuse to enter into or renew existing preparedness and prevention arrangements with the Permittee, the Permittee shall document this refusal in the operating record and immediately notify the Department in writing of the refusal.

II.F. CONTINGENCY PLAN

II.F.1. Implementation of Plan. The Permittee shall immediately carry out the provisions of the Contingency Plan, Permit Attachment 4 (Section F of the Permit Application), and follow the emergency procedures described by COMAR 26.13.05.04G whenever there is an imminent or actual fire, explosion, or release of hazardous waste or constituents which threatens or could threaten human health or the environment (COMAR 26.13.05.04B(2)).

II.F.2. Amendments to Plan. The Permittee shall review and immediately amend, if necessary, the Contingency Plan, Permit Attachment 4 (Section F of the Permit Application) as required by COMAR 26.13.05.04E.

II.F.3. Copies of Plan. The Permittee shall maintain a copy of the Contingency Plan, Permit Attachment 4 (Section F of the Permit Application) and all revisions at 1321 Joh Avenue, Baltimore, Maryland, and shall submit copies to local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services, as required by COMAR 26.13.05.04D.

II.F.4. Emergency Coordinator. The Permittee shall comply with requirements of COMAR 26.13.05.04F that, at all times, there shall be at least one employee either on the facility premises or on-call (that is, available to respond to an emergency by reaching the facility within a short period of time) to function as emergency coordinator with the responsibility for coordinating all emergency response measures. The emergency coordinator shall have the qualifications and authority specified in COMAR 26.13.05.04F.

II.F.5. Emergency Procedures. The Permittee shall comply with the requirements of COMAR 26.13.05.04G. (Emergency Procedures), and incorporate these procedures in the material available to the Emergency Coordinator referred to in Permit Condition II.F.4.

II.G. RECORDKEEPING AND REPORTING

II.G.1. Operating Record. The Permittee shall maintain a written operating record at the facility in accordance with COMAR 26.13.05.05D. The regulation describes in

detail the information which shall be recorded as it becomes available, and maintained in the Operating Record until closure of the facility.

II.G.2. Biennial Hazardous Waste Report. The Permittee shall comply with all applicable biennial report requirements of COMAR 26.13.05.05F. This report shall be submitted to the Department by March 1st of each even numbered year.

II.G.3. Availability, Retention and Disposition of Records. The Permittee shall retain records and make them available in accordance with COMAR 26.13.05.05E.

II.G.4. Additional Reports. The Permittee shall submit any required additional reports in accordance with COMAR 26.13.05.05H.

II.H. CLOSURE REQUIREMENTS

II.H.1. Performance Standard: The Permittee shall close the facility as required by COMAR 26.13.05.07B, and in accordance with the Closure Plan, Permit Attachment 6 (Section G of the Permit Application).

II.H.2. Amendment to Closure Plan: The Permittee shall amend the Closure Plan, Permit Attachment 6 (Section G of the Permit Application), in accordance with COMAR 26.13.05.07C whenever necessary. A written request to the Department for a permit modification is required to amend the closure plan.

II.H.3. Notification of Closure: The Permittee shall notify the Department at least 45 days prior to the date the Permittee expects to begin final closure (COMAR 26.13.05.07C(4)(a)(ii)).

II.H.4. Time Allowed for Closure: After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste and shall complete closure activities in accordance with COMAR 26.13.05.07D and the schedules specified in the Closure Plan, Permit Attachment 6 (Section G of the Permit Application).

II.H.5. Disposal or Decontamination of Equipment: The Permittee shall decontaminate and/or dispose of all facility equipment as required by COMAR 26.13.05.07E and the Closure Plan, Permit Attachment 6 (Section G of the Permit Application).

II.H.6. Certification of Closure: The Permittee shall certify that the facility has been closed in accordance with the specifications in the Closure Plan, as required by COMAR 26.13.05.07F. The certification shall be signed by The Permittee and an independent registered professional engineer.

II.I. COST ESTIMATE FOR FACILITY CLOSURE

II.I.1. Annual Adjustment. The Permittee shall adjust the Closure Cost Estimate , permit Attachment 6, (Section G of the Permit Application) for inflation, annually in

accordance with the requirements of 40 CFR 264.142(b), which have been incorporated by reference in COMAR 26.13.05.08.

II.I.2. Adjustment for Changed Conditions. The Permittee shall revise the Closure Cost Estimate whenever there is a change in the facility's Closure Plan, as required by 40 CFR 264.142 (c).

II.I.3. Availability. The Permittee shall keep at the facility the latest Closure Cost Estimate as required by 40 CFR 264.142 (d).

II.J. FINANCIAL REQUIREMENTS

The Permittee shall maintain continuous compliance with COMAR 26.13.05.08 by providing financial assurance, as required by 40 CFR 264.143, in at least the amount of the cost estimates required by Permit Condition II.I. Changes in financial assurance mechanisms must be approved by Department.

II.K. LIABILITY REQUIREMENTS

The Permittee shall comply with the requirements of COMAR 26.13.05.08 and the documentation requirements of 40 CFR 264.147, including the requirements to have and maintain liability coverage for sudden accidental occurrences in the amount of at least $1 million per occurrence with an annual aggregate of at least $2 million, exclusive of legal defense costs.

II.L. INCAPACITY OF OWNER/OPERATOR, GUARANTORS, OR FINANCIAL INSTITUTIONS

The Permittee shall comply with 40 CFR 264.148, whenever necessary.

II.M. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTES

II.M.1. The Permittee shall take precautions in accordance with COMAR 26.13.05.02H(1) to prevent accidental ignition or reaction of ignitable or reactive waste. This waste shall be separated and protected from sources of ignition or reaction. While such waste is being handled, the Permittee shall confine smoking and open flame to specially designated locations. "No Smoking" signs shall be conspicuously placed wherever there is a hazard from ignitable or reactive waste.

II.M.2. When required, storage, or disposal of ignitable or reactive waste, and mixture or commingling of incompatible wastes, or incompatible wastes and materials shall be conducted so as not to:

II.M.2.a. Generate extreme heat or pressure, fire or explosion, or violent reaction;

II.M.2.b. Produce uncontrolled toxic mist, fumes, dusts, or gasses in sufficient quantities to threaten human health or the environment;

II.M.2.c. Produce uncontrolled flammable fumes or gasses in sufficient quantities to pose a risk of fire or explosions;

II.M.2.d. Damage the structural integrity of the device or facility containing the waste; or

II.M.2.e. Through other like means threaten human health or the environment (COMAR 26.13.05.02H(2))

II.M.3. When required to comply with the Permit Condition II.M.1 or II.M.2, the Permittee shall document that compliance (COMAR 26.13.05.02H(3)).

II.N. SECURITY

The Permittee shall comply with the security provisions of COMAR 26.13.05.02E.

II.O. MANIFEST SYSTEM

The Permittee shall comply with all applicable requirements of COMAR 26.13.05.05.

II.P. FLOODPLAIN STANDARD

The Permittee shall provide the Department with identification of whether the facility is located within a 100-year flood plain, as required by COMAR 26.13.07.02D(26). A facility located in a 100-year flood plain (defined as any land area which is subject to a 1% or greater chance of a flooding in any given year from any source) is required to demonstrate to the Department that procedures are in effect which will cause the waste to be removed safely, before flood waters can reach the facility, to a location where wastes will not be vulnerable to flood waters, as required in COMAR 26.13.05.02-1B.

II.Q. WASTE MINIMIZATION/SOURCE REDUCTION

II.Q.1. Program Development and Implementation. The Permittee shall develop and conduct a Waste Minimization/ Source Reduction Program, in accordance with §7-205 of the Environment Article, Annotated Code of Maryland and COMAR 26.13.05.05F(4)(j) and (k). The Permittee as a generator may not dispose of a controlled hazardous substance unless the Permittee demonstrates to the satisfaction of the Department that:

II.Q.1.a. Recovery possibilities have been considered; and

II.Q.1.b. The controlled hazardous substance cannot be reasonably treated further to reduce the volume of or the hazard that the controlled hazardous substance poses to the environment.

II.Q.2. Reporting. By March 1 of each even-numbered year, the Permittee shall submit a report to the Department that:

II.Q.2.a. Describes the efforts undertaken during the preceding year to reduce the volume and toxicity of the waste generated; and

II.Q.2.b. Describes the changes in volume and toxicity of waste actually achieved during the preceding year in comparison to previous years.

II.Q.3. Annual Certification – Waste Minimization.

II.Q.3.a. At least annually, the Permittee shall prepare a certification that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste that the Permittee generates, as specified in COMAR 26.13.05.05D(2)(i).

II.Q.3.b. The Permittee shall maintain the certification required by Permit Condition II.Q.3.a in the facility operating record until closure of the facility.

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PART III - SPECIAL CONDITIONS FOR TRUCK-TO-TRUCK TRANSFER

III.A. GENERAL PROVISIONS

III.A.1. The Permittee is a hazardous waste service provider involved in the collecting and transporting of hazardous wastes. Part III of this permit establishes conditions under which the Permittee may stage in-transit waste on transport vehicles and conduct truck-to-truck transfer of containers of hazardous waste at its facility located at 1321 Joh Avenue, Baltimore, Maryland 21227.

III.A.2. This permit allows the Permittee to use the facility identified on Page 1 of the permit ("the Facility") for the following activities, subject to specified conditions:

III.A.2.a. The staging of in-transit hazardous waste on hazardous waste transport vehicles, for a time period of no more than 10 days beginning with the initial arrival of a given shipment of a hazardous waste;

III.A.2.b. The truck-to-truck transfer of hazardous waste immediately upon removal from a waste transport vehicle;

III.A.2.c. The offloading and temporary staging indoors of in-transit hazardous wastes pending loading onto another transport vehicle; and

III.A.2.d. The transfer of hazardous waste from a location within the warehouse that is part of the permitted facility to an outbound transport vehicle.

III.A.3. The Permittee is not authorized to conduct any activities at the Facility that would require the facility to be considered a designated facility for the purposes of hazardous waste manifest requirements.

III.A.4 The Permittee may conduct truck-to-truck transfer of waste containers only within the areas identified in Permit Condition III.B.

III.A.5. Limitations on waste types that the Permittee may transfer are specified in Permit Condition III.C.

III.A.6 Permit Conditions III.D-III.J identify specific operating conditions that the Permittee shall follow in addition to the requirements specified in Parts I and II of this permit.

III.A.7 Permit Condition III.K specifies requirements concerning closure of the Facility at the end of its operating life.

III.B. CONTAINER TRANSFER AND STAGING AREAS AND CAPACITIES

III.B.1. The Permittee may transfer hazardous waste from one vehicle to another at the Facility by off-loading hazardous waste from a vehicle parked in the transfer area as identified in Figures 1F and 4E in Attachment 7, subject to the following conditions:

III.B.1.a. Dock Doors 1 and 2, located on the east side of the warehouse building, may only be used in hazardous waste transfer operations for the offloading of waste from trucks for:

1) transfer to outbound trailers parked at Dock Doors 3, 4, and 5 on the west side of the warehouse building; or

2) temporary storage in the warehouse building in a designated containment area located between Dock Doors 3 and 4, prior to loading onto outbound trailers parked at Dock Doors 3, 4, or 5; and

III.B.1.b. Except for temporary staging of containers that are actively being transferred between vehicles, the only area in the warehouse that may be used for hazardous waste storage is the designated containment area located between Dock Doors 3 and 4.

III.B.2. The total amount of hazardous waste at any time at the facility shall not exceed 19,800 gallons. This is equivalent to 396 standard 55-gallon drums (containing no more than 50 gallons each).

III.B.3. The maximum amount of hazardous waste that may be stored in the warehouse in the designated containment area pending loading onto a vehicle:

III.B.3.a. Shall not exceed 2500 gallons, with no container in the designated containment area having a capacity greater than 250 gallons; and

III.B.3.b. May be further limited by the aisle space requirement of Permit Condition III.H.3

III.C. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

III.C.1. The Permittee may use the Facility for the staging of in-transit wastes, for a time period of no more than 10 days beginning with the initial arrival of a given shipment of a hazardous waste, and the transfer between over-the-road vehicles of containers of wastes identified in Table III.1, subject to the terms of this permit.

(See next page for Table III.1)

Table III.1

Hazardous Waste Code	Description
D001, D002, D003	Ignitable, corrosive, and reactive characteristic waste.
D004-D043	Solid waste exhibiting the toxicity characteristic.
F001-F012, F019-F028, F032, F034-F035, F037-F039	Hazardous waste from non-specific sources.
K001-K011, K013-K052, K060-K062, K069-K071, K073, K083-K088, K093-K118, K123-K126, K131, K132, K136, K141-K145, K147-K151, K156-K159, K161, K169-K172, K174-K178, K181	Hazardous waste from specific sources
P001-P018, P020-P024, P026-P031, P033-P034, P036-P051, P054, P056-P060, P062-P078, P081, P082, P084, P085, P087-P089, P092-P106, P108-P116, P118-P123, P127, P128, P185, P188-P192, P194, P196-P199, P201-P205	Discarded commercial chemical products, off specification species, containers, spill residues thereof (acute hazardous waste).
U001-U012, U014-U039, U041-U053, U055-U099, U101-U103, U105-U138, U140-U197, U200, U201, U203-U211, U213-U223, U225-U228, U234-U240, U243, U244, U246-U249, U271, U278-U280, U328, U353, U359, U364, U367, U372, U373, U387, U389, U394, U395, U404, U409-U411	Discarded commercial chemical products, off-specification species, containers, and spill residues of these.

III.C.2. The Permittee shall fully identify all wastes prior to acceptance and arrival at the Facility, using information provided by the hazardous waste generator, as described in the Waste Analysis Plan, Permit Attachment 1 (Section C of the Permit Application).

III.C.3. The Permittee is prohibited from accepting any waste for transfer that is not positively identified and documented by the generator based on a) documented knowledge of the process generating the waste, or b) a waste sampling and analysis plan meeting the requirements of COMAR 26.13.05.02D(2).

III.C.4. The Permittee is prohibited from accepting the following wastes at the Facility for transfer:

III.C.4.a Class 1 Explosives in Division 1.1, Division 1.2, or Division 1.3, as defined in U.S. Department of Transportation (USDOT) regulations at 49 CFR 173.50;

III.C.4.b "Forbidden explosives" as defined in 49 CFR 173.54;

III.C.4.c Chemical warfare agents and their treatment byproducts including, but not limited to, Maryland Waste Codes K991 through K999, MD02 and MD03; and

III.C.4.d Any hazardous waste having a waste code not specifically included in Table III-1 of Permit Condition III.C.1.

III.C.5. The Permittee shall maintain documentation demonstrating compliance with Permit Conditions III.C.1 through III.C.4 as part of the facility operating record, and shall make this documentation available to the Department upon request.

III.D. OPERATING CONDITIONS

III.D.1. The Permittee shall maintain the facility and manage the hazardous wastes in accordance with the conditions of this permit, and in accordance with the specifications and descriptions presented in the permit attachments.

III.D.2. The Permittee shall assure that all hazardous wastes managed at the Facility are properly packaged, labeled, and marked in accordance with COMAR 26.13.03.05A-C.

III.D.3. The Permittee shall:

III.D.3.a. Comply with the placarding requirements of COMAR 26.13.03.05D for hazardous wastes managed at the Facility; and

III.D.3.b. Assure that hazardous waste transport vehicles that engage in hazardous waste transfer operations at the Facility are in compliance with the placard requirements of 49 CFR Part 172, Subpart F.

III.D.4. The Permittee shall not handle containers in a manner that may cause them to rupture or leak.

III.D.5. The Permittee shall accept transfer wastes only when compatibility of the waste and containers is ascertained.

III.D.6. The Permittee shall ensure that wastes in each staging process and transfer load meet the requirements of 49 CFR 177.848, Segregation and Separation.

III.D.7. The Permittee shall stage and transfer containers of hazardous waste only in or through the areas described in Permit Condition III.B, and shown in Permit Attachment 7, Facility Description, in Figure 4E and in the 5 photographs designated as "Figure 1F" and "Page 4 of 9" through "Page 8 of 9".

III.D.8. The Permittee shall ensure that in areas where ignitable or reactive wastes are being managed:

III.D.8.a. There are no open flames or other sources of ignition present; and

III.D.8.b. Smoking is prohibited.

III.D.9. The Permittee shall not place containers holding ignitable or reactive wastes, or park trucks loaded with such containers, within 15 meters of the property line for a period in excess of 12 hours (COMAR 26.13.04.01E (2) and 26.13.05.09 (F)).

III.D.10. The Permittee shall limit the time that any container of hazardous waste remains at the Facility to a maximum of 10 days, including the time that the container is kept on the first and second transport vehicle, as well as any time that the container is stored in the designated containment area located between Dock Doors 3 and 4 in the warehouse.

III.D.10. The Permittee shall maintain necessary documentation to determine the length of time each container remains on site, and shall make this documentation available to the Department upon verbal or written request.

III.E. CERTIFICATION OF CONSTRUCTION OR MODIFICATION

III.E.1. The Permittee may not conduct any hazardous waste management activities in any unit described under Permit Condition III.B until the Permittee has met the submittal requirement of Permit Condition I.H.1, and the conditions regarding approval by the Department in Permit Condition I.H.2 have been met.

III.E.2. The Permittee shall include the following information with the certification of construction required by Permit Condition I.H.1:

III.E.2.a. Descriptions and delineation of any changes to proposed drawings;

III.E.2.b. All required professional certifications;

III.E.2.c. All quality assurance/quality control (QA/QC) control documentation; and

III.E.2.d. All required physical testing results.

III.F. CONDITION OF CONTAINERS

If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects), or if it begins to leak, the Permittee shall transfer the hazardous waste from the container to a container that is in good condition, or shall otherwise manage the waste in compliance with the conditions of this permit.

III.G. COMPATIBILITY OF WASTES WITH CONTAINERS

The Permittee shall assure that the ability of each container to contain the waste is not impaired as required by COMAR 26.13.05.09C.

III.H. MANAGEMENT OF CONTAINERS

III.H.1. The Permittee shall manage containers as required by COMAR 26.13.05.09D.

III.H.2. The Permittee shall not open in-transit containers of hazardous waste at the Facility for any purpose other than to verify container contents or repackage waste from a damaged container.

III.H.3. The Permittee shall maintain the aisle space of at least two feet in the designated containment area located in the warehouse between Dock Doors 3 and 4.

III.H.4. The Permittee may stack containers in the container staging area:

III.H.4.a. No more than 2 containers high;

III.H.4.b. Only if the stacking creates a stable arrangement, with the upper container(s) unlikely to tip over as a result of externally applied forces or the shifting of the lower container; and

III.H.4.c. Only if the design and materials of construction of the containers are such that the structural integrity of the supporting containers will not be compromised by the additional forces the containers are subjected to as a result of the stacking.

III.I. CONTAINMENT SYSTEMS

III.I.1. The Permittee shall submit to the Department for review and approval the design details for the secondary containment systems that will be constructed for the outbound trailer parking area at Dock Doors 3, 4, and 5 on the west side of the warehouse building, and the designated containment area located between Dock Doors 3 and 4 in the warehouse.

III.I.2. The Permittee shall comply with the construction certification requirements in Permit Condition III.E following construction of the secondary containment systems.

III.I.3. The Permittee shall not conduct hazardous waste transfer operations until the Permittee has met the submittal requirement of Permit Condition I.H.1 for the containment systems identified in Permit Condition III.I.1, and the conditions regarding approval by the Department in Permit Condition I.H.2 have been met.

III.I.4. The Permittee shall maintain the secondary containment systems in accordance with specifications contained in Permit Attachment 7 (Section A of the Permit

Application); the approved design, as built, certified, and accepted in accordance with Permit Conditions III.E; and the requirements of COMAR 26.13.05.09H.

III.J. INSPECTION SCHEDULES AND PROCEDURES

III.J.1. The Permittee shall inspect the hazardous waste management area at least weekly and in accordance with the inspection schedule in Permit Attachment 2.

III.J.2. The Permittee shall remove any leaked or spilled waste immediately upon discovery.

III.J.3. The Permittee shall remedy any deterioration or malfunction of equipment or structures that the inspection reveals on a schedule which ensures that the problem does not lead to an environmental or human health hazard. When a hazard is imminent or has already occurred, remedial action shall be taken immediately as required under COMAR 26.13.05.02F(3).

III.J.4. The Permittee shall restock any shortage in first aid supplies, personnel protection equipment, and spill control and containment supplies no later than 48 hours after discovery, unless the Department approves a later deadline.

III.K. RECORDKEEPING

III.K.1. The Permittee shall retain all records as required under COMAR 26.13.03.06 and 26.13.05.05D. The retention period of all required records is extended automatically during the course of any unresolved enforcement action regarding the facility or as requested by the Department.

III.K.2. The Permittee shall maintain, as part of the facility records, documentation showing compliance with the requirements of COMAR 26.13.05.05D (Operating Record), and COMAR 26.13.05.20 (Record Keeping Instructions).

III.L. CLOSURE

III.L.1. At closure, the Permittee shall remove all hazardous waste and hazardous waste residues from the storage area, and close the facility in accordance with an approved detailed closure plan. Permit Attachment 6 is a general closure plan showing the minimum topics to be included in the detailed closure plan.

III.L.2. At least 90 days prior to the intended beginning of closure, the Permittee shall submit a detailed closure plan including a sampling and analysis plan to the Department for review and approval.

III.L.3. The detailed closure plan required by Permit Condition III.K.2 shall include at least the following elements:

III.L.3.a. The steps necessary to perform partial and/or final closure of the facility at any point during its active life;

III.L.3.b. A description of how each hazardous waste container management area will be closed;

III.L.3.c. A description of how final closure of the facility will be conducted, identifying the maximum extent of operations during the active life of the facility;

III.L.3.d. An estimate of the maximum inventory of hazardous wastes that was ever onsite over the active life of the facility and a description of the methods used to remove, transport, treat, store, or dispose of all hazardous wastes;

III.L.3.e. A detailed description of the steps needed to remove or decontaminate all hazardous waste residues and contaminated containment system components, equipment, structures, and soils;

III.L.3.f. A description of methods employed to decontaminate structures and equipment that will remain on site after closure;

III. L.3.g. Identification of decontamination agents to be used, including chemical and physical specifications of the agents;

III.L.3.h. Specific safety measures to be taken to control spread of contamination during the closure activity and to protect human health and the environment;

III. L.3.i. A detailed description of other activities necessary during the closure period; and

III. L.3.j. A schedule for closure of each hazardous waste management unit and for the final closure of the facility; and

III. L.4. The sampling and analysis plan, required by Permit Condition III.L.2, shall, at a minimum, include the following components to verify the effectiveness of decontamination activities:

III. L.4.a Type and number of samples (rinsewater, surface wipes, core, soil, groundwater, etc.) to be collected;

III. L.4.b. A listing and justification of sampling and analytical methods employed, with the Permittee required to select and propose these methods, as appropriate for the constituent in question, in accordance with:

1) Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (EPA Document Number SW-846, latest edition); or

2) Equivalent methods acceptable to the Department;

III. L.4.c. A description of quality assurance and quality control procedures associated with the selected sampling and analysis methods;

III. L.4.d. A definition and justification of a Target Compound List (TCL) for which the verification samples will be analyzed;

III. L.4.e. Identification and justification of a threshold level for each compound on the TCL list that determines a "clean" or "contaminated" condition;

III. L.4.f. Number, location, media or substances to be sampled; and

III. L.4.g. For cleanup and sampling for PCB's, a demonstration that the Permittee will follow the procedure recommended in 40 CFR 761 Subpart G.

III. L.5. The Permittee shall decontaminate the hazardous waste handling areas, including the loading/ unloading, staging areas, the transfer area, and the equipment that is to remain onsite after closure, in accordance with the detailed closure plan submitted by the Permittee and approved by the Department in accordance with Permit Conditions III.L.2 through III.L.4.

III. L.6. Within 60 days of the completion of the closure activities, the Permittee shall submit a:

III. L.6.a. Closure report containing results of the activities conducted in compliance with each component of the approved closure plan, including, but not limited to, the verification results demonstrating a clean closure of the storage areas, and a certification of closure as required by COMAR 26.13.05.07F; or

III. L.6.b. Written request to extend the 60-day deadline including the reason for the request and a proposed timeline for completion.

III. L.7. If the Permittee is unable to demonstrate a clean closure in accordance with Permit Condition III.L.6, the Permittee shall inform the Department within 60 days of the completion of the closure activities, and propose measures to achieve closure performance standards, such as submission of a post-closure care plan for the Department's review and approval.

(Permit continues on next page.)

PART IV-LIST OF PERMIT ATTACHMENTS and SIGNATURE

IV.A. PERMIT ATTACHMENTS

The following Permit Attachments are enforceable parts of this permit. Permit Attachments, numbered 1 through 7, include sections and attachments of the Permittee's application that carry their own page number or letter designations. The following list indicates specific parts of the application included in each Permit Attachment. Permit Attachments are intended to provide further details concerning facility operations and how compliance with permit conditions will be achieved. However, if there is a discrepancy between a permit condition and the contents of a Permit Attachment, the permit condition shall prevail.

Permit Attachment Number & Title	No. of Pages	Location in Permit Application
1. Waste Analysis Plan	1	Section C
2. Procedures to Prevent Hazards	16	Section D
3. Personnel Training	8	Section E
4. Contingency Plan	11	Appendix F
5. Closure Plan	2	Section G;
6. Process Information	2	Section B.
7. Facility Description	14	Section A
8. Permit Application Part A	12	Section H

IV.B. PERMIT SIGNATURE

DRAFT

Kaley Laleker, Director
Land and Materials Administration

DRAFT

Date Signed

ATTACHMENT 1

Waste Analysis Plan

SECTION C: WASTE ANALYSIS PLAN The information provided in this section is submitted in accordance with the requirements of COMAR 26.13.05.02D.

Wastes handled at EQNE are shipped in DOT-approved containers and are not opened at the facility. All wastes that arrive at the 10-Day facility have been pre=approved and identified at the generator facility. Containers are moved directly between trucks and trailers at the transfer area. This transfer activity is subject to regulatory requirements for CHS transporters. There are no waste analysis requirements for CHS transporters who conduct transfer operations; therefore, EQNE has not included in this application waste acceptance procedures for truck to transfer trailer wastes.

Each shipment of waste that is transferred at the facility has a corresponding set of shipping papers. The shipping papers will be prepared in accordance with EPA, MDE, and DOT regulations. The shipping papers may not identify EQNE as the destination facility.

C1 WASTE CHARACTERISTICS

EQNE does not treat or dispose of any hazardous waste at the facility. EQNE will be responsible for ensuring that hazardous waste containers that are transferred through the facility are permitted waste types, and do not exceed the capacity limitations at the facility.

Upon arrival of a truck, EQNE will verify that the count, container marking and labeling, and shipping papers are all in compliance with applicable regulations and this permit. If the facility determines that there are deficiencies with any of these items, then corrections will be made with assistance from the generator, or the containers will be refused and shipped back to the generator or an alternate facility.

EQNE will monitor the capacity at the facility by tracking the container count of each shipment on the transfer log.

C2 CHEMICAL AND PHYSICAL ANALYSIS

EQNE does not treat of dispose of any hazardous waste at the facility. Therefore, EQNE does not perform chemical and physical analysis on the waste containers that arrive at the facility.

EQNE team members are trained to perform visual inspections of waste containers while containers are collected from the generators' sites and while containers are actively transferred between trucks and trailers at the transfer area. During all container-handling tasks, EQNE team members evaluate shipping papers and labels on drums that indicate the chemical and physical characteristic of the waste. EQNE team members who observe evidence that containers may be labelled incorrectly or documented incorrectly are instructed to take appropriate corrective action.

EQNE team members who perform waste pick-up activities at generator sites are instructed to refuse shipments if they observe evidence that the waste has been improperly characterized.

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ATTACHMENT 2

Procedures to Prevent Hazards

SECTION D: PROCEDURES TO PREVENT HAZARDS

The information provided in this section is submitted in accordance with the requirements of COMAR 26.13.07.02D (18), COMAR 26.13.07.02D (19), COMAR 26.13.07.02D (20), COMAR 26.13.07.02 D (22) and COMAR 26.13.07.02 D (24). Other regulations addressed to complete this section include COMAR 26.13.05.02E, F, H; COMAR 26.13.05.03C, D, E, F; COMAR 26.13.05.09E, F, G; and COMAR 26.13.07.02E (1) (a), (b), (c).

D1 SECURITY

EQ Northeast, Inc. has prepared the following plan to prevent unauthorized entry into the facility and possible disturbance of waste transfer activities. The plan describes the precautions taken by EQNE to prevent unknowing entry and minimize the possibility of unauthorized entry of persons or livestock onto the transfer area property. The plan also lists specific measures that EQNE has taken to comply with the standards relative to signage, and physical obstructions to prevent unauthorized entry.

D2 SECURITY PROCEDURES AND EQUIPMENT

The property is surrounded by an eight-foot-high perimeter fence along all four sides which helps enclose the property. Interstate highway 95, which runs under the overpass, flanks the east perimeter of the property. There are two gates located on the southeast and southwest sides of the building facing Joh Avenue. Both gates are locked when EQNE employees are not performing work at the site and kept closed when EQNE employees are working within the perimeter. The perimeter fence and padlocks are inspected daily to ensure that the padlocks are functional, the integrity of the fence is intact, and no unauthorized entry has been detected.

Each vehicle and trailer that comes to dock in the truck transfer area is equipped with a padlock for the cargo portion of the vehicle. The cargo portion of the vehicle as well as the cabin power unit is locked when parked at the site unless EQNE personnel are present.

D2.1 BARRIER

The property located at 1321 Joh Avenue is surrounded by sections of eight-foot perimeter fence and vegetation. Access onto the property is limited by padlocked gates. Each gate, truck and trailer containing waste, is locked or padlocked when EQNE personnel are not present.

D2.2 MEANS OF ENTRY CONTROL

Access to the truck transfer and container storage areas is limited to EQNE employees. Entry to the truck transfer area is controlled by two padlocked gates. Access to the container storage area, inside the warehouse, is controlled by the two padlocked gates in addition to two access doors, one interior door exiting from the office area and one exterior door at the end of the warehouse near Dock Door 3.

Both gates are padlocked and both doors are locked when EQNE personnel are not present. All visitors are required to be escorted by EQNE personnel.

D2.3 WARNING SIGNS

Signs with the legend "Danger – Unauthorized Personnel Keep Out" are posted on the fence in the front and both gates. They are posted so that they can be seen from a distance of 25 feet. Also, "No Smoking" signs, which are legible for a distance of 25 feet, have been placed in the vicinity of the transfer area.

D3 INSPECTION SCHEDULE

This section will outline the criteria for inspections.

D4 GENERAL INSPECTION REQUIREMENTS

EQNE conducts inspections routinely to detect any problems or potential problems with the management of hazardous waste at the truck transfer and container storage areas, and to initiate corrective actions before any problems create a threat to human health and/or the environment. Inspections are conducted to detect malfunctions, deterioration, operator error, leaks, and discharges that could cause a threat to public health, safety, or welfare of the environment.

The inspection plan identifies all areas and items to be inspected, establishes the minimum inspection frequency, and describes the inspectional activities implemented by EQNE to ensure the proper safety and emergency equipment is available and in working order, security devices are in good repair, and operating equipment and structures and in safe working condition.

D4.1 CONTAINERS IN STORAGE DAILY INSPECTION LOG

Daily inspections will be conducted of the waste containers in storage for signs of deterioration and/or corrosion, and for signs of leaks or releases. The facility will maintain a written record documenting the inspections and whether any release was identified, if any container was replaced, or if any repair was needed to containment, and the results of each inspection will be kept on site for a period of at least three (3) years.

Daily for the purpose of facility inspections pertains to normal work day schedules (may exclude weekends when operations are not scheduled and holidays when facility is closed).

D4.2 SECONDARY CONTAINMENT WEEKLY INSPECTION

Weekly visual examination will be made of all containment systems and devices to ensure that they are free of any cracks, gaps, or other imperfections. The facility will maintain a written record documenting the inspections and whether any release was identified or if any repair was needed to containment, and the results of each inspection will be kept on site for a period of at least three (3) years.

D4.3 INSPECTION SUMMARY

Below is a summary list of the areas in the truck transfer area, container storage area, safety and emergency equipment, and safety devices that require routine inspection. The list also identifies the inspection frequency for each item. The items listed in the table below are inspected to prevent, detect, or respond to environmental or human health hazards. The summary list identifies specific items which are to be examined during the inspection.

Table 6B

INSPECTION ITEM	FREQUENCY	FIGURE REFERENCE
Parked Vehicles with Hazardous Waste	Daily	4B
Areas Subject to Spills	During Transfer Activities	4A
Waste Containers in Container Storage Area	Daily	4B
Waste Capacity Limit Check	Daily	4B
Gates/Entry Doors	Daily	4B
Waste Containers in Transfer Area	During Transfer Activities	4A

Table 6B (continued)

INSPECTION ITEM	FREQUENCY	FIGURE REFERENCE
Perimeter / Fence	Daily	4B
Signage	Daily	4A
Secondary Containment	Weekly	4C
Emergency Equipment Spill Kit	Weekly	4C

D4.4 SCHEDULE OF REMEDIAL ACTION

All deficiencies identified during an inspection, such as deterioration or malfunctioning of equipment or structures shall be addressed in a timely manner such that any threat to human health and/or the environment does not occur. EQNE will attempt to remedy all inspection deficiencies immediately or by the end of the business day. If corrective measures cannot be completed by the end of the business day, EQNE shall immediately develop a corrective action plan, which will include a specific, realistic projected resolution date. The details of the corrective action plan and the projected resolution date will be documented in the inspection log the same day that a deficiency is noted. If a deficiency is identified that would cause an imminent hazard or adverse effect on the environment and/or human health, corrective or remedial action shall be taken immediately. EQNE personnel shall then notify the appropriate authorities per the Contingency Plan and initiate remedial actions.

In the event of an emergency involving the release of hazardous constituents to the environment, efforts shall be directed toward containing the hazard, removing it, and subsequently decontaminating the affected area. The Contingency Plan contains additional details regarding appropriate steps to be taken in cases of an emergency.

D5 SPECIFIC PROCESS INSPECTION REQUIREMENTS

All areas subject to spills from the movement of containers, including the space where containers are actively transferred between trucks and trailers, are inspected at least once each operating day for signs of spills, leaks, or structural damage.

D5.1 CONTAINER INSPECTIONS

All containers of hazardous waste that are moved between trucks and trailers shall be visually inspected during transfer. Each container is evaluated to ensure appropriate container condition, proper closure, and for correct markings and labelling per DOT regulations. If a container is leaking, corroded, or rusted, the container will be over packed.

Inspections of the containers managed at the truck transfer and container storage areas are also conducted per inspection schedule provided in Section D4.3. Information specified on the inspection log includes the inspector's name and title, date and time of the inspection, item(s) of inspection, status of item(s), observations, and the date and nature of repairs, and remedial or corrective action. Completed container inspection records will be kept in the office area.

If the status of a particular item is unacceptable, the corrective action information is recorded, including the date and nature of repairs and remedial action.

D6 WAIVER OR DOCUMENTATION OF PREPAREDNESS AND PREVENTION REQUIREMENTS

EQNE does not seek a waiver of preparedness and prevention requirements.

D7 EQUIPMENT REQUIREMENTS

Internal and external communication, emergency equipment, fire control equipment, and spill clean-up equipment are addressed in this section. Additional information is found in the Contingency Plan (see SECTION F).

D7.1 INTERNAL COMMUNICATION DEVICES

Cellular phones or an air horn is used within the truck transfer and container storage areas to alert others of emergency situations. All EQNE personnel have cellular phones. Air horns will be inspected weekly.

D7.2 EXTERNAL COMMUNICATION DEVICES

Telephones are located in the office at 1321 Joh Avenue and can be used to summon emergency assistance from the police, fire department, or other response units. All EQNE personnel have cellular phones.

D7.3 EMERGENCY EQUIPMENT

An emergency equipment inspection checklist is included in Figure 4C. The list of emergency equipment maintained at EQNE and inspection schedule for the emergency equipment is included in Section D4.3 on page 7.

D7.4 WATER AND FIRE CONTROL

The truck transfer and container storage areas are equipped with fire extinguishers. All EQNE personnel are trained to handle and discharge the fire extinguishers correctly. All fire extinguishers are evaluated weekly to ensure that they are present, charged and have been inspected within the last year.

Water for fire control in the area is supplied by hydrants operated by the local fire department. These hydrants supply an adequate amount of water for fire control at the truck transfer and container storage areas. There are a total of four (4) fire hydrants located on Joh Avenue near our facility. There are 2 fire hydrants west of the facility: one 294 feet away and one 731 feet away. There are 2 fire hydrants east of the facility: one 972 feet away and one 1,324 feet away.

D7.5 TESTING AND MAINTENANCE OF EQUIPMENT

Emergency equipment is inspected according to the schedule included in Section D4.3.

D7.6 ACCESS TO COMMUNICATION OR ALARM SYSTEM

EQNE personnel working in the truck transfer and container storage areas have access to cellular phones. In the event an employee is working alone in the truck transfer or container storage area and an emergency arises, cellular phones or an air horn can be used to summon assistance. The air horn shall be inspected weekly for proper function.

D8 AISLE SPACE REQUIREMENTS

All waste containers are moved directly from the trucks to their designated transfer trailer or into the container storage area. Trucks and trailers are loaded in accordance with DOT requirements. The storage containment area will have a two-foot aisle for accessibility to the containers stored within.

D9 DOCUMENTATION OF ARRANGEMENTS

Copies of the Contingency Plan (see SECTION F) will be sent to the local fire department.

D10 PREVENTIVE PROCEDURES, STRUCTURES AND EQUIPMENT

This section outlines the preventive procedures that EQNE has put into place at 1321 Joh Avenue.

D11 UNLOADING OPERATIONS

All hazardous waste containers will remain closed during all transfer operations. Containers are unloaded from trucks using a drum dolly, pallet jack, or other mechanical equipment and are moved between trucks and trailers in a manner as to avoid rupturing or puncturing the containers. All waste transferred between trucks and trailers shall be visually evaluated to ensure that all waste is contained and managed in accordance with DOT segregation requirements.

D12 WATER SUPPLIES

Transfers of hazardous waste containers occur in the truck transfer area at Dock Door 3 through Dock Door 5. The containment area at Dock Door 3 through Dock Door 5 is designed to meet secondary containment requirements for all transfer materials. Any spills will be contained within the transfer trailer or within the bermed containment area. Therefore, there is no potential for contamination of water supplies.

D13 EQUIPMENT AND POWER FAILURE

There is no equipment onsite that requires an external power source; therefore, the effects of a potential power failure are insignificant. In the event of a brief power interruption, the local utility company shall be contacted immediately for assistance.

D14 PERSONNEL PROTECTION PROCEDURES

A list of protective equipment is presented under Emergency Equipment and Provisions of the Contingency Plan.

D15 PROCEDURES TO MINIMIZE RELEASES TO THE ATMOSPHERE

Wastes are managed in closed containers. Therefore, EQNE does not handle waste in a way that would produce uncontrollable mists, fumes, or gasses.

D16 PREVENTION OF REACTION OF IGNITABLE, REACTIVE AND INCOMPATIBLE WASTE

The truck transfer area is used for transfer of containerized wastes while in transport from the generator to the designated destination facility. Containers of ignitable, combustible, or reactive wastes in the transfer and container storage areas are clearly marked with labels that identify the contents and the appropriate DOT hazard class. Trucks and trailers parked at the truck transfer area and/or onsite are marked with placards that indicate the presence of ignitable, combustible, or reactive materials (above DOT volume thresholds) on board.

The truck transfer and container storage areas are kept separate from sources of ignition or reaction. Cutting/welding tasks and activities that generate a high degree of friction or sparks do not normally occur near the truck transfer and container storage areas. Smoking and open flames are strictly prohibited in both the truck transfer and container storage areas at all times. Signs are placed in the transfer and container storage areas that clearly read "No Smoking",

Containers of waste remain closed while located at the truck transfer and container storage areas. EQNE does not comingle or consolidate the contents of waste containers at the transfer or container storage areas. The truck transfer and container storage areas are inspected on a daily basis to ensure that containers located onsite are free of leaks and ignitable, reactive and incompatible, wastes are properly segregated.

SECTION E provides details of the required training program for ignitable and reactive waste.

EQ Northeast, Inc.
1321 Joh Avenue
Baltimore, MD 21227

TRANSFER AREA INSPECTION CHECKLIST

DATE: _____ **TIME:** _____ **BY:** _____

The inspection items listed below are to evaluated during waste transfer activities.

INSPECTION ITEM	INSPECTION DETAIL	CONDITION ACCEPTABLE	
		YES	NO
AREA SUBJECT TO SPILLS:	• The dock surface transfer area is clean and free of obstructions / trip hazards.		
EXTERIOR CONTAINMENT AREA	• Berms are in good condition and appropriate to contain potential leaks within the transfer area		
WASTE CONTAINERS	• Containers in the transfer area are closed and in good condition (i.e. not leaking and free of excessive rust or corrosion) • All waste is held in appropriate DOT specified containers • All containers are properly marked, labelled and segregated according to DOT guidelines and EQNE special permits.		

OBSERVATIONS AND NOTES RELEVANT TO REMEDIAL OR CORRECTIVE ACTIONS:

_____

_____

_____

_____

_____

_____

_____

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EQ Northeast, Inc.
1321 Joh Avenue
Baltimore, MD 21227

EXTERIOR / PARKED VEHICLE(S) / CONTAINERS-IN-STORAGE DAILY INSPECTION CHECKLIST

DATE: _____ **TIME:** _____ **BY:** _____

INSPECTION ITEM	INSPECTION DETAIL	CONDITION ACCEPTABLE	
		YES	NO
PARKED VEHICLES WITH HAZARDOUS WASTE	• Vehicle cabs and cargo areas are secured from authorized entry.		
	• Vehicle cargo areas are equipped with functioning padlocks.		
	• The cargo areas of each vehicle onsite appear to be in good condition.		
	• All waste materials are contained in the cargo area of trucks and no waste material is actively leaking from the vehicle at the time of inspection.		
	• All vehicles are properly marked and placarded according to DOT and MDE regulations.		
WASTE CONTAINERS IN CONTAINER STORAGE AREA	• Hazardous Waste Storage Signs are in place		
	• Containers labelled		
	• Evidence of container deterioration and/or corrosion		
	• Separation of incompatible wastes		
	• Container closures secure		
	• Evidence of Spills or releases		
PERIMETER FENCE	• Fence is intact (no signs of defects or deterioration).		
	• No signs of forced entry		
GATES / ENTRY DOORS	• Gates / Doors locked when employees are not present.		
	• Padlocks are functional.		
	• Gates / Doors are intact (no signs of defects or deterioration).		
	• No signs of forced entry.		
	• Evacuation routes throughout property are unobstructed.		

INSPECTION ITEM	INSPECTION DETAIL	CONDITION ACCEPTABLE	
		YES	NO
WASTE CAPACITY LIMIT CHECK	• The total volume of waste on site does not exceed the permitted capacity threshold (21,175 gallon/ 385 X 55-gallon drum equivalent).		

OBSERVATIONS AND NOTES RELEVANT TO REMEDIAL OR CORRECTIVE ACTIONS:

EQ Northeast, Inc.
1321 Joh Avenue
Baltimore, MD 21227

SECONDARY CONTAINMENT WEEKLY INSPECTION CHECKLIST

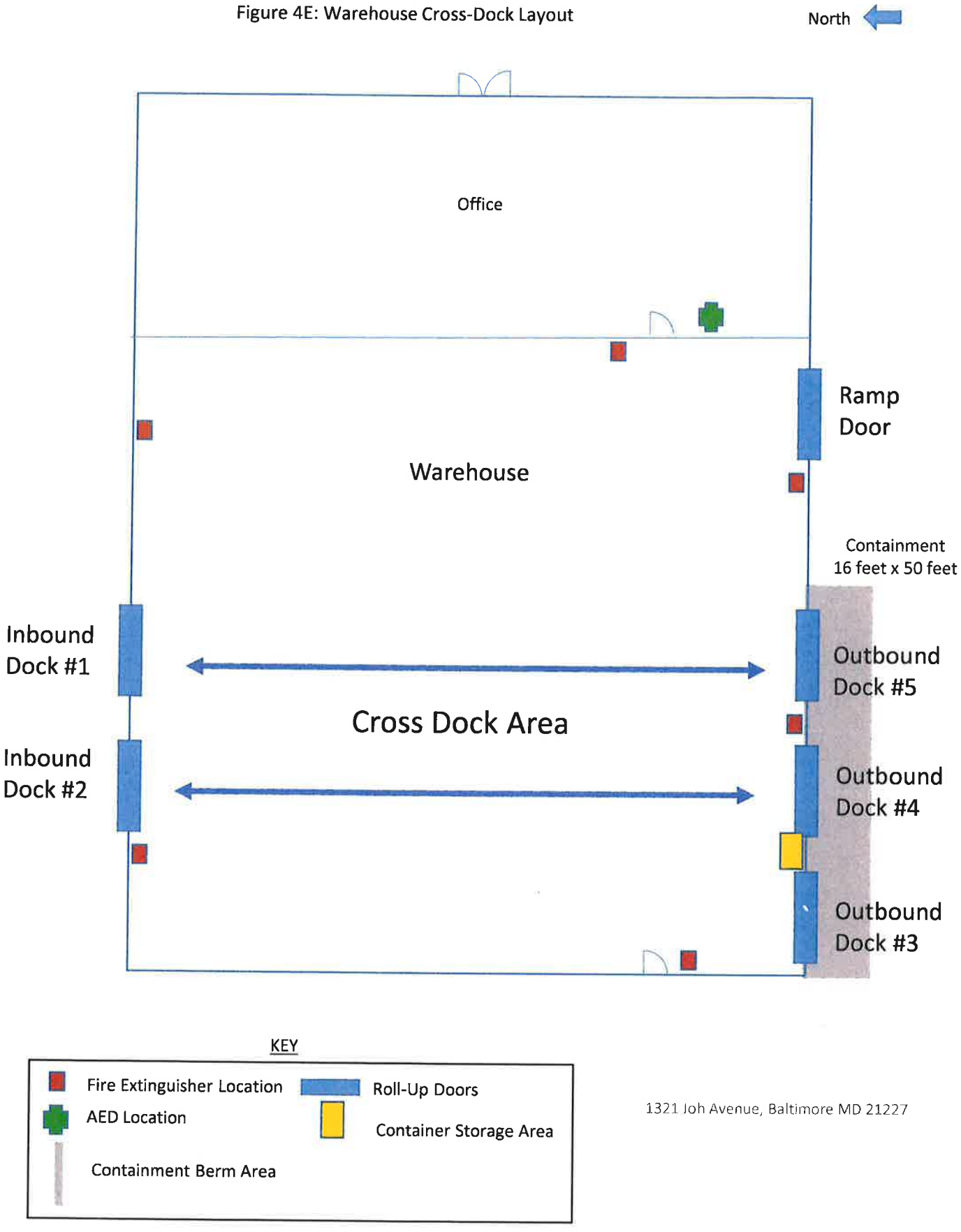
INSPECTION FOR WEEK OF: _____ **TO:** _____

Results from the visual inspection of all the containment systems and devices.

	CONDITION ACCEPTABLE	
INSPECTION ITEM:	**YES**	**NO**
INTERIOR STORAGE AREA CONTAINMENT:		
Free of gaps, cracks or other imperfections?		
Evidence of spills or releases?		
Any repairs needed to correct wear and tear?		
EXTERIOR CONTAINMENT AREA:		
Free of gaps, cracks or other imperfections?		
Evidence of spills or releases?		
Any repairs needed to correct wear and tear?		
EMERGENCY EQUIPMENT:		
Verify that following pieces of Emergency Equipment are located at the property:		
• 1 fire extinguisher (fully charged and inspected)		
• 1 bale sorbents		
• 1 (16 lbs.) bag of speedi-dry		
• 1 spill boom		
• 1 (40 – 50 lbs.) bag of acid neutralizer		
• 1 (40 – 50 lbs.) bag of caustic neutralizer		
• 1 box Tyvek suits		
• 1 SCBA		
• 1 box of gloves		
• 1 pair of rubber boots		
• 1 over pack drum		
• 1 air horn (functionality confirmed weekly)		

OBSERVATIONS AND NOTES RELEVANT TO REMEDIAL OR CORRECTIVE ACTIONS:

EQ Northeast, Inc.
CHS Permit: X-XXX
EPA ID No.: MDR000527703
Figure 4E: Warehouse Cross-Dock Layout



1321 Joh Avenue, Baltimore MD 21227

EQ Northeast, Inc.
CHS Permit: X-XXX
EPA ID No.: MDR000527703
Figure 4E: Warehouse Cross-Dock Layout
Loading Dock Profile Pictures

Dock #3:
Height: 50 inches
Loading Area Depth: 142 inches
Bumper & Lip: 16 inches

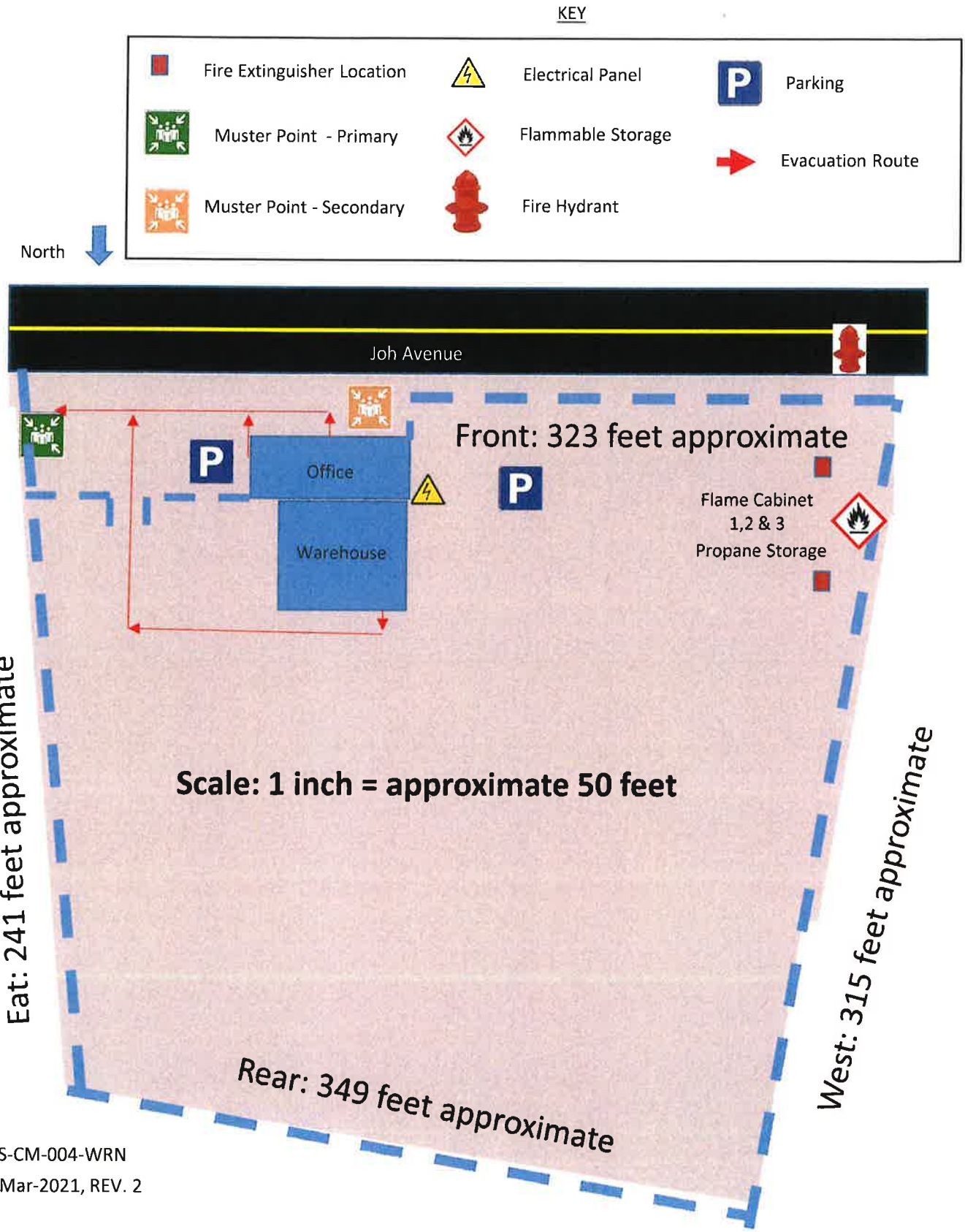
Dock #4:
Height: 51 inches
Loading Area Depth: 142 inches
Bumper & Lip: 16 inches

Dock #5:
Height: 51 inches
Loading Area Depth: 142 inches
Bumper & Lip: 16 inches

Note: Loading Area Depth measurements include Bumper & Lip Depth.

EQ Northeast, Inc.
CHS Permit: X-XXX
EPA ID No.: MDR000527703
Figure 4F: Emergency Evacuation Map

US Ecology Baltimore - 1321 Joh Avenue, Baltimore MD 21227



EMERGENCY EQUIPMENT AND MATERIALS LIST

EQ Northeast, Inc.
1321 Joh Avenue
Baltimore, MD 21227

The following is a list of equipment / material maintained on site:

MATERIAL

QUANTITY	ITEM DESCRIPTION
1	Pallet of bagged absorbent clay (speedi-dry)
10	Bundles of absorbent pads
	Absorbent booms (3-inch and 5-inch)
2	95-gallon poly overpack drums
	Blanker roll absorbents (oil and universal use)
2	Roll poly sheeting
1	55-gallon drum pump (chemical-resistant)
1	Roll pH paper
1	Drum plugging kit
1	Pail "Plug-n-Dyke"
1	Plastic shovel
1	Plastic dustpan
1	Polypropylene broom
1	Floor squeegee
2	SCBA units
4	Tyvek suits
1	Box, nitrile gloves
4	Pair disposable poly botties
2	Pair safety splash googles

EMERGENCY EQUIPMENT AND MATERIALS LIST

MATERIAL

QUANTITY	ITEM DESCRIPTION
2	Face shields
1	Non-sparking hammer
1	Non-sparking bung wrench
1	Speed wrench and socket
12	20-lbs. fire extinguisher, Type ABC
1	Eyewash station
2	First-Aid Kit
1	Explosion-proof flashlight
1	Roll caution tape
6	Hazardous waste container labels
1	NIOSH guidebook
1	DOT Emergency Response Guidebook
	Degreaser / Oil remover
	Citric Acid and Bicarbonate

EQUIPMENT

QUANTITY	ITEM DESCRIPTION
1	Vactor
1	Roll-off truck
	Roll=off Cans
	Shop Vacuums
100	Drums (various sizes)

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ATTACHMENT 3

Personnel Training

SECTION E: PERSONNEL TRAINING

The purpose of this plan is to describe the training that EQ Northeast, Inc. personnel must receive to ensure that they are prepared to perform their duties related to hazardous waste management at the facility. The EQ Northeast, Inc. training plan has been developed in accordance with COMAR 26.13.05.02G and COMAR 26.13.07.02D (28). This plan is designed to familiarize employees involved in hazardous waste management with license requirements, hazardous waste regulations, the hazards associated with their job responsibilities, general activities performed at the transfer facility, and proper hazardous waste management procedures. The training program is designed to ensure that facility personnel are able to respond effectively to emergency situations by familiarizing them with the facility's contingency plan and emergency equipment. In addition, the training program is intended to provide all personnel with sufficient on-the-job training and classroom instruction to ensure that proper hazardous waste management procedures area conducted and documented for all hazardous waste managed at the transfer facility. A list of job descriptions for personnel involved in the management of waste is provided in Figure 5A Job Descriptions.

The training program at EQNE may fall into one or two categories per COMAR 26.13.05.02G:

1. Annual Classroom Training
2. Specific On-the-Job Training Related to the Position

All employees involved in the management of waste containers at the truck transfer area receive annual training. Classroom training is conducted by either qualified EQNE personnel or outside qualified firms. Training may consist of lectures or mock exercises. Sufficient time will be provided throughout the classroom presentations to allow for questions from the attendees. On-the-Job training is administered by appropriate supervisory personnel. The On-the-Job training will address the individual's position, duties, and responsibilities involving waste management at the truck transfer area.

Both the classroom and the on-the-job training will be documented in each person's training records.

E1 NEW EMPLOYEES / REASSIGNMENTS

Newly hired personnel are not permitted to work in unsupervised positions until they have successfully received adequate initial classroom and on-the job training. According to OSHA regulations 29 CFR 1910.120, employees who handle hazardous waste and who are expected to respond to a hazardous waste incident, must have introductory training prior to starting their particular job function. EQNE personnel must successfully complete applicable training within six months from the date of their employment or upon being assigned to a new position at EQNE. Training requirements range from 24 to 40 hours depending on the job category of the individual. The completion of a 40-hour hazardous waste training program is required for employees involved in daily hazardous waste activities that may require the use of respiratory protection.

E2 ANNUAL REVIEW

All personnel involved in the management of hazardous waste at the facility take part in an annual review of their initial training. The training is documented and modified if found to be inadequate. The program must include a review of the existing training program and review updates of applicable regulations and a review of hazardous materials handling practices, worksite safety, personal protective equipment, health effects and medical surveillance, review of chemical hazards and toxicology and modifications to the facility and its operations. The EHS Manager will conduct the annual review of training.

Training records must include the following information specific to each employee:

- Employee Name,
- Job Title,
- End of Employment (for past employees), and
- Complete list of training activities completed during the course of the individual's employment at EQNE.

E3 INDIVIDUALS QUALIFIED TO TRAIN

EQNE will maintain a list of individuals who are qualified to perform classroom and on-the-job training of all new personnel and will conduct an annual review of all training. The EHS Manager and Field Supervisor are qualified to conduct training will maintain their knowledge of regulations and procedures through self-study, on-the-job experience and by attending seminars on the subject.

E4 TRAINING RECORDS

EQNE will maintain documents and records related to the training program, including:

- Job title for each position at the truck transfer and container storage areas related to hazardous waste management;
- A written job description corresponding to each position (Figure 5A);
- A written description of the type and amount of initial and annual training corresponding to each position;
- The names of all current or former EQNE team members who have filled the relevant positions within the last three (3) years; and
- Documentation indicating that current or former EQNE team members have received adequate initial and annual training.[3]

List of EQNE Training Topics

1. Operations at EQ Northeast, Inc.
2. Waste Identification
3. Chemical Hazards
4. Ignitable and Reactive Wastes
5. Waste Handling
6. Waste Acceptance
7. Waste Storage
8. Site Inspection Requirements
9. Emergency Procedures
10. Emergency Equipment
11. Emergency Coordinator Duties
12. Waste Shipment Requirements
13. Reports & Recordkeeping

Training requirements for each job position involved in hazardous waste management is included in the written job description provided in Figure 5A.

[3]Copies of training records for individual team members will remain onsite for at least three (3) years after an EQNE team member's end of employment date or until closure for current employees.

TITLE: General Manager		
BASIC FUNCTION	Directs all activities of the CHS facility unit including day to day operations, environmental compliance, worker safety, transportation, waste collection, and other functions as applicable.	
EDUCATION	Bachelor's Degree in business management, industrial engineering, biology, chemistry or related, or an equivalent combination of education and experience. Knowledge and understanding of RCRA, DOT, TSCA, and other applicable regulations.	
REQUISITE SKILLS	1. Minimum of 5 years practical experience in hazardous waste Management and chemical industry operations. 2. Minimum of 2 years supervisory and management experience. 3. Skills in employee relations, customer relations and community relations 4. Excellent verbal and written communication skills. 5. Excellent organizational skills.	
TRAINING REQUIREMENTS	**TRAINING TOPICS**	**TRAINING FREQUENCY**
	Operations at EQ Northeast, Inc	Initial Assignment
	Waste Identification, Chemical Hazards	Initial Assignment, annually
	Ignitable and Reactive Wastes	Initial Assignment, annually
	Waste Handling	Initial Assignment
	Waste acceptance and Storage	Initial Assignment
	Site Inspection Requirements	Initial Assignment, upon requirement change/update
	Emergency Procedures	Initial assignment, annually, upon procedure, facility change
	Emergency Equipment	Initial assignment, annually, upon procedure, facility change
	Emergency Coordinator Duties	Initial assignment, annually, upon procedure, facility change
	Waste Shipment Requirements	Initial assignment, every three years, upon requirement change / update
	Reports and Recordkeeping	Initial assignment, annually
SPECIFIC RESPONSIBILITIES	1. Directs operation activities to achieve budgeted goals. 2. Directs and organizes activities of personnel ad reviews their performance. 3. Ensures compliance with applicable federal, state, and local regulations. 4. Manages regulatory affairs activities with government regulatory agencies and participates in community outreach, political affairs, and public relations activities. 5. Coordinates the scheduling and review of internal and external environmental audits in coordination with the USE audit team. 6. Provides direction, support and oversight of activities to renew, amend, modify or expand existing licenses or permits consistent with adopted business plans. 7. Oversees implementation of company policies and procedures. 8. Ensures operations are properly staffed and personnel are properly trained. 9. Works to ensure the safety of employees involved in all aspects of the transfer operation. 10. Works with EQNE staff members to ensure that the shipments are properly reviewed account to waste qualification process described in the CHS permit. 11. Maintains relationships with TSDFs. 12. Maintains relationships with permitted hauling companies. 13. Ensures protection of Company assets through ongoing maintenance of facility infrastructure. 14. Maintains high enthusiasm and standards for safety and quality control.	

TITLE: Operations Manager		
BASIC FUNCTION	Manage a safe, efficient and profitable CHS transfer operation with direct responsibilities for training, safety, site operations, transportation, EPA and state relations and public community relations.. Manages operations staff members (Field Chemists, Field Supervisors, Technicians, Drivers) who perform waste-removal projects at customers' sites, transport waste to permitted vehicles and conduct waste transfer activities at the CHS facility. Works with staff members to ensure that waste is handled, transported and transferred according to the CHS permit.	
EDUCATION	Bachelor's degree in engineering, chemistry, biology or related fields, or an equivalent combination of education and experience.	
REQUISITE SKILLS	1. Minimum of 5 years of practical experience in hazardous waste management or chemical industry operations. 2. Excellent leadership capabilities. 3. Skills in employee relations. 4. Excellent verbal and written communication skills. 5. Excellent organizational skills.	
TRAINING REQUIREMENTS	**TRAINING TOPICS**	**TRAINING FREQUENCY**
	Operations at EQ Northeast, Inc	Initial Assignment
	Waste Identification, Chemical Hazards	Initial Assignment, annually
	Ignitable and Reactive Wastes	Initial Assignment, annually
	Waste Handling	Initial Assignment
	Waste acceptance and Storage	Initial Assignment
	Site Inspection Requirements	Initial Assignment, upon requirement change/update
	Emergency Procedures	Initial assignment, annually, upon procedure, facility change
	Emergency Equipment	Initial assignment, annually, upon procedure, facility change
	Emergency Coordinator Duties	Initial assignment, annually, upon procedure, facility change
	Waste Shipment Requirements	Initial assignment, every three years, upon requirement change / update
	Reports and Recordkeeping	Initial assignment, annually
SPECIFIC RESPONSIBILITIES	1. Provides technical support to management and subordinates. 2. Works with Transportation Dispatch team to maintain a daily schedule and staff customers' waste-removal projects effectively. 3. Works with Lab Pack team to ensure that customers' waste are classified and packaged per DOT specifications. 4. Ensures that operations staff members package waste correctly and evaluate the condition of waste containers prior to transport and during transfer operations at CHS facility. 5. Ensures that operations staff members collect appropriate shipping papers from customers during waste removal projects. 6. Ensures operations staff members are properly trained. 7. Ensures that operations staff members perform waste transfer activities at the CHS facility in a safe and compliant manner. 8. Ensures that corrective actions are developed and executed when operational errors occur. 9. Works with Transportation Dispatch team to coordinate and schedule shipments of waste from the CHS facility following transfer activities. 10. Manages the operation in order to meet customer expectations for quality and service.	

TITLE: EHS Manager		
BASIC FUNCTION	Assist the Operations Manager to ensure that the facility is operated in a safe and compliant manner.	
EDUCATION	Bachelor's degree in environmental engineering, environmental science, chemistry, biology, or a related field; or an equivalent combination of education and experience required.	
REQUISITE SKILLS	1. Minimum of 2 years practical experience in hazardous waste management or chemical industry operations. 2. Possesses strong comprehension of environmental regulations and practices. Strong comprehension of PHMSA and FMCSA DOT regulations and how the regulations apply 3. Assists in the resolution of regulatory issues with regulatory agencies across multiple environmental regulatory programs. 4. Excellent verbal and communication skills. 5. Excellent organizational skills. 6. Well-versed in regulatory features of the CHS permit and the ability to comprehend all aspects of the transfer operation. 7. Ability to relate information in a clear and concise manner. 8. Ability to anticipate needs of EQNE as they relate to compliance with federal, state and municipal regulations.	
TRAINING REQUIREMENTS	**TRAINING TOPICS**	**TRAINING FREQUENCY**
	Operations at EQ Northeast, Inc	Initial Assignment
	Waste Identification, Chemical Hazards	Initial Assignment, annually
	Ignitable and Reactive Wastes	Initial Assignment, annually
	Waste Handling	Initial Assignment
	Waste acceptance and Storage	Initial Assignment
	Site Inspection Requirements	Initial Assignment, upon requirement change/update
	Emergency Procedures	Initial assignment, annually, upon procedure, facility change
	Emergency Equipment	Initial assignment, annually, upon procedure, facility change
	Emergency Coordinator Duties	Initial assignment, annually, upon procedure, facility change
	Waste Shipment Requirements	Initial assignment, every three years, upon requirement change / update
	Reports and Recordkeeping	Initial assignment, annually
SPECIFIC RESPONSIBILITIES	1. Ensures that health and safety projects are conducted in a safe manner, according to company, industry and regulatory safety and health standards. 2. Ensures occupational health, safety, and hygiene programs are effective. 3. Ensures employees receive required safety training and Personal Protective Equipment (PPE) equipment as required by law and best business practice. 4. Inspects facilities to detect existing or potential accident and health hazards, and recommends corrective or preventative measures where indicated. 5. Develops and delivers health and safety training programs and media, which will increase proficiency in safe practices and promote safety consciousness. 6. Controls employee exposure to hazardous waste, chemicals and radiation. 7. Represents the company in community or industry safety groups and programs. 8. Maintains safety files and health records as required by regulations and management. 9. Monitors health and safety program implementation and effectiveness. 10. Partners with operations management to develop health and safety solutions for achieving business and compliance goals.	

TITLE: Field Supervisor		
BASIC FUNCTION	Assist the Operations Manager to ensure that the facility is operated in a safe and compliant manner. The Field Supervisor may complete inspection duties and other operational tasks as needed.	
EDUCATION	The Field Supervisor will have, at a minimum a High School diploma or GED. Will have the ability to read, write and understand English with basic computer skills.	
REQUISITE SKILLS	1. Minimum of 2 years of practical experience in hazardous waste management or chemical industry operations. 2. Excellent verbal and written communication skills. Ability of communicating effectively with customers over the phone and email. 3. Detail-oriented (i.e. completeness of federal, state and municipal forms, letters and other communications) with good filing skills. 4. Excellent organizational skills. 5. Ability to complete tasks in a timely manner and to recognize the need to meet specific deadlines required by law and EQNE 6. Ability to relate information in a clear and concise manner. 7. Ability to understand the operational limitations and regulatory restrictions of the CHS facility.	
TRAINING REQUIREMENTS	**TRAINING TOPICS**	**TRAINING FREQUENCY**
	Operations at EQ Northeast, Inc	Initial Assignment
	Waste Identification, Chemical Hazards	Initial Assignment, annually
	Ignitable and Reactive Wastes	Initial Assignment, annually
	Waste Handling	Initial Assignment
	Waste acceptance and Storage	Initial Assignment
	Site Inspection Requirements	Initial Assignment, upon requirement change/update
	Emergency Procedures	Initial assignment, annually, upon procedure, facility change
	Emergency Equipment	Initial assignment, annually, upon procedure, facility change
	Emergency Coordinator Duties	Initial assignment, annually, upon procedure, facility change
	Waste Shipment Requirements	Initial assignment, every three years, upon requirement change / update
	Reports and Recordkeeping	Initial assignment, annually
SPECIFIC RESPONSIBILITIES	1. Provides supervision for a specific work shift of all waste handling activities which are received at or shipped from the facility. 2. Ensures plant and personnel safety by enforcing safety procedures and providing training as required by plant management. 3. Supervises the activities of operations personnel. 4. Coordinates with vendors, transporters, and treatment facilities. 5. Provides for housekeeping of all waste handling/transfer areas of the facility. 6. Notifies appropriate facility personnel of any maintenance requirements for plant and transportation equipment. 7. Reviews and signs RCRA manifests. 8. Ensures that all personnel abide by all safety rules and procedures. 9. Participates directly in emergency response operations relating to activities conducted at the facility's site and transportation activities, both on and off-site, which involve the facility's equipment and personnel. 10. Responsible for continuous adherence to the Company's Health & Safety (H&S) Program. This includes: the health and safety of themselves and their coworkers, completing tasks in a safe manner, attending safety meetings and mandatory H&S training, and reporting any unsafe conditions, acts or unanticipated hazards to their Operations Manager, General Manager or EHS Manager.	

TITLE:	**Field Chemist**
BASIC FUNCTION	Assists Operations with Lab Pack activities. The Field Chemist may complete inspection duties and other operational tasks as needed.
EDUCATION	Bachelor's degree in Chemistry, Environmental Science or a related field; or an equivalent combination of education and experience required. Must have the aptitude to retain a commercial driver's license.
REQUISITE SKILLS	1. Minimum of 2 years of practical experience in hazardous waste management or chemical industry operations. 2. Knowledge of RCRA as it relates to waste characterization and waste processing protocols, and familiarity with DOT regulations. 3. Excellent verbal and written communication skills. Ability of communicating effectively with customers over the phone and email. 4. Detail-oriented (i.e. completeness of federal, state and municipal forms, letters and other communications) with good filing skills. 5. Excellent organizational skills. 6. Ability to complete tasks in a timely manner and to recognize the need to meet specific deadlines required by law and EQNE 7. Ability to relate information in a clear and concise manner. 8. Ability to identify trends and data patterns. 9. Ability to coordinate and manage multiple projects. Ability to work within a team environment and handle multiple tasks simultaneously. 10. Ability to understand the operational limitations and regulatory restrictions of the CHS facility.

TRAINING REQUIREMENTS	**TRAINING TOPICS**	**TRAINING FREQUENCY**
	Operations at EQ Northeast, Inc	Initial Assignment
	Waste Identification, Chemical Hazards	Initial Assignment, annually
	Ignitable and Reactive Wastes	Initial Assignment, annually
	Waste Handling	Initial Assignment
	Waste acceptance and Storage	Initial Assignment
	Site Inspection Requirements	Initial Assignment, upon requirement change/update
	Emergency Procedures	Initial assignment, annually, upon procedure, facility change
	Emergency Equipment	Initial assignment, annually, upon procedure, facility change
	Emergency Coordinator Duties	Initial assignment, annually, upon procedure, facility change
	Waste Shipment Requirements	Initial assignment, every three years, upon requirement change / update
	Reports and Recordkeeping	Initial assignment, annually

SPECIFIC RESPONSIBILITIES	1. Provides Lab Packing services at customer sites maintaining compliance with applicable regulations and with established company procedures. 2. Samples and characterizes hazardous and non-hazardous waste at generator's facility. 3. Generates waste profiles into end-user facility. 4. Performs price quotes for customer. 5. Provides customer with detailed inventory of waste on site. 6. Transports wastes from customer sites to end user or transfer facility. 7. Generates required internal paperwork in order to provide accurate and timely customer service and invoicing. 8. Help to off load waste at end user facility 9. De-packs and consolidates waste. 10. Provides technical support.

TITLE:	Operations Staff Members (Technician Environmental Drivers)	
BASIC FUNCTION	Perform physical tasks associated with waste removal projects including packaging, loading / unloading vehicles, transporting and transferring waste to and from CHS facility.	
EDUCATION	Must have the ability to read, write and understand English. Must have the aptitude to retain a commercial driver's license.	
REQUISITE SKILLS	Skills, abilities and attributes of the person in this position include: 1. Detail-oriented (i.e. ensure that drums are marked appropriately, completeness of federal, state and municipal forms). 2. Physically capable of moving waste containers by means of drum dollies, pallet jacks or other mechanical devices. 3. Able to follow technical instructions for packaging, labeling, and shipping and transferring waste materials.	
TRAINING REQUIREMENTS	**TRAINING TOPICS**	**TRAINING FREQUENCY**
	Operations at EQ Northeast, Inc	Initial Assignment
	Waste Identification, Chemical Hazards	Initial Assignment, annually
	Ignitable and Reactive Wastes	Initial Assignment, annually
	Waste Handling	Initial Assignment
	Waste acceptance and Storage	Initial Assignment
	Site Inspection Requirements	Initial Assignment, upon requirement change/update
	Emergency Procedures	Initial assignment, annually, upon procedure, facility change
	Emergency Equipment	Initial assignment, annually, upon procedure, facility change
	Emergency Coordinator Duties	Initial assignment, annually, upon procedure, facillty change
	Waste Shipment Requirements	Initial assignment, every three years, upon requirement change / update
	Reports and Recordkeeping	Initial assignment, annually
SPECIFIC RESPONSIBILITIES	Follows the instructions of the EQNE management to: 1. Package waste correctly and evaluate the condition of waste containers prior to transport and during transfer operations at the CHS facility. 2. Move containers of waste between trucks and trailers at the CHS facility.	

ATTACHMENT 4

Contingency Plan

SECTION F: CONTINGENCY PLAN

F1 PURPOSE

EQ Northeast's truck transfer and container storage areas located at our Baltimore facility are designed, operated, constructed and maintained to minimize the possibility of any threat to public health, safety, welfare, or the environment from fire, explosion, or any other unplanned sudden or anticipated release of hazardous waste or hazardous waste constituents to air, soil, surface water, or groundwater.

The provisions of the Contingency Plan will be carried out immediately whenever any of the following hazardous conditions are present or imminent:

- Fire
- Explosion
- Release of hazardous waste that could threaten human health or safety, or the environment.

Copies of the Contingency Plan and all revisions are maintained at the locations listed below and shall be submitted at local police and fire departments, hospitals and any other state and local agency emergency responders. The information in this section is submitted in accordance with the requirements for an emergency response and contingency plan as contained in COMAR 26.13.07.2D (21); COMAR 26.13.05.04. Copies of acknowledgement letters to local authorities are attached as Figure 4G.

Table 6C

Location of Contingency Plan	Detail / Address	Phone Number
EQ Northeast, Inc.	Local Branch Office: 1321 Joh Avenue, Baltimore, MD 21227	443-304-3050
EQ Northeast, Inc.	Main Branch Office: 185 Industrial Road, Wrentham, MA 02093	508-384-6151
Arbutus Volunteer Fire Department	5200 Southwestern Boulevard, Halethorpe, MD 21227	410-242-6601
Baltimore Police Department	Southwest District: 424 Fort Hill Avenue, Baltimore, MD 21223	410-396-2488
Saint Agnes Hospital	900 S Caton Avenue, Baltimore, MD 21229	667-234-6000
The Johns Hopkins Hospital	1800 Orleans Street, Baltimore, MD 21287	410-955-5000
Maryland Department of Environment (MDE)	1800 Washington Boulevard, Suite 105, Baltimore, MD 21230	866-633-4886

F2 AUTHORITIES AND RESPONSIBILITIES

The following outlines the authorities and responsibilities of EQNE personnel as it relates to spills and associated emergencies at the EQNE Baltimore facility.

Primary Emergency Coordinator

The Primary Emergency Coordinator is responsible for coordinating all emergency response measures at the facility. The Primary Emergency Coordinator is familiar with all aspects of the facility's contingency plan, all operations at the facility, the types of materials handled, the location of records at the facility, including

emergency response records, and the facility layout. This person has the authority to commit resources needed to carry out the contingency plan and transfer authority to another competent person.

Alternate Emergency Coordinator(s)

The Alternate Emergency Coordinator will coordinate with the Primary Emergency Coordinator(s) or act on their behalf. The Alternate Emergency Coordinator(s) are familiar with all aspects of the facility's contingency plan, all operations at the facility, the types of materials handled, the location of records at the facility including emergency response records, and the facility layout.

EHS Manager

The EHS Manager is responsible to ensure that all proper notifications to regulatory agencies have been completed in the proper timeframes. The EHS manager is also responsible for ensuring that all spill clean-up material is properly characterized and disposed of properly. The EHS Manger will ensure that all necessary personnel have received the proper training to execute this plan.

Site Personnel

All site personnel are responsible for following the plan in the event of any spill or emergency. Site personnel will follow any other instructions during an emergency provided by the Primary or Alternate Emergency Coordinator(s).

The specific responsibilities of the Emergency Coordinator during an emergency situation are described in detail in section F3. The list of Emergency Coordinators can be found below.

Table 6A

Emergency Coordinators	Title	Home Address	Office Number	Cell / Home Number
Primary: Allison White	Operations Manager	REDACTED REDACTED	443-304-3050	REDACTED
Primary: Andrew Buchanio	Regional Manager	REDACTED REDACTED	508-803-1219	REDACTED
Alternate: Walt Moody	Field Supervisor	REDACTED REDACTED	Use cellphone number provided	REDACTED
Alternate: Robert Reckline	Foreman	REDACTED REDACTED	Use cellphone number provided	REDACTED

F3 UPDATING THE CONTINGENCY PLAN

This contingency plan will be reviewed, and immediately amended. If necessary, whenever:

a. The facility permit is revised;
b. The plan fails in an emergency;
c. The facility changes: in design construction, operation, maintenance, or other circumstances – in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
d. The list of Emergency Coordinators changes;
e. The list of emergency equipment changes.

It is the responsibility of the Primary Emergency Coordinator to initiate any changes to the Contingency Plan.

F4 IMPLEMENTATION OF THE CONTINGENCY PLAN

F4.1 GENERAL EMERGENCY RESPONSE PROCEDURES

The guidelines within this section will provide appropriate procedures in case of a fire or explosion emergency, or a spill or release situation.

F4.1.1 FIRE OR EXPLOSION RESPONSE PROCEDURES

In the event of any imminent or actual fire or explosion emergency covered by this Contingency Plan, facility personnel must follow the procedures in the section.

Note: for fires that cannot be controlled by using a fire extinguisher, only properly trained and qualified personnel should be involved in actual fire-fighting activities.

Alert Affected Personnel

Any person discovering an actual or imminent fire or explosion emergency must first use all means reasonably available to alert any personnel whose health or safety are, or may be, immediately threaten by the emergency condition.

Notify Supervisor/Operations Manager

In any site emergency, and in any case where the emergency condition involves or may involve hazardous waste, the Supervisor or Operations Manager responsible for the area must be immediately notified of the emergency condition.

Supervisor/Operations Manager Responsibilities

1. Notify facility personnel – Activate internal alarm or facility communication systems to notify personnel.
2. Initiate an investigation when the fire or explosion emergency is reported.
3. Determine if the incident:
    a. Can be handled by EQ Northeast personnel.
    b. Requires assistance by outside emergency services.
    c. Requires evacuation of personnel and/or equipment (See Evacuation Action Plan, Section F6 of this plan).
4. Know the location of fire extinguishing equipment and be familiar with its safe operation.
5. Establish a Command Post that is upwind of the incident. The supervisor or Emergency Coordinator at the Command Post must record information concerning the incident.
6. Maintain an awareness of movable equipment (i.e., tractor trailers, forklifts, and company vehicles) within your area of responsibility, should their removal from the facility becomes necessary. Use qualified personnel and available yard crews to position equipment in a safe area.
7. Notify outside agencies, if necessary.
8. Upon completion of the evacuation, the Operations Manager or Lead Emergency Coordinator must be notified as to the status of the evacuees.
9. The local fire department or other emergency responders will be met in the front of the main entrance (or gate) to the facility by an EQNE representative authorized and able to communicate the situation to the responder(s). The Operations Manager or Supervisor will designate the responsible representative for this task.

Notify Emergency Coordinator

When the Supervisor and the Operations Manager are unavailable, the Emergency Coordinator(s) must be notified. Emergency Coordinators must execute the Supervisor/Operations Manager Responsibilities listed above.

Clear Unnecessary Personnel / Evacuation

Fire or explosion related area will be cleared of all unnecessary personnel. If the Supervisor or Operations Manager (or emergency Coordinator in their absence) determines that evacuation of all or part of the facility is appropriate, then the Evacuation Action Plan shall be implemented. Follow and use the Evacuation Plan in Section F10, titled "Evacuation Action Plan".

Medical Response

Injured persons will be removed, and qualified medical personnel will administer medical treatment.

Essential Fire Safety / Keep Fire from Hazardous Waste

In the event of a fire, the fire department will be called to respond. For safety reasons, EQ Northeast personnel will not respond to the fire. Consistent with the personal safety of EQ Northeast personnel and emergency responders, care must be taken to prevent the fire from spreading to any hazardous waste.

Mutual Aid Response Organization

The organizations listed below can be contacted for in the event of an emergency at EQ Northeast in Baltimore. Copies of the contingency plan have been submitted to the following facilities to familiarize them with the hazardous wastes on site and emergency response equipment.

Table 6D

Organization	Contact Number	Additional Information
MDE – Emergency Response Division 1800 Washington Boulevard, Suite 105 Baltimore, MD 21230	**(866) 633-4886**	MDE's Emergency Response Division (ERD) prepares for and responds to Emergencies involving oil and hazardous chemical spill incidents, and other environmental crisis. Use the hotline only for cases with IMMEDIATE threat to public health and grave impact to the environment.
National Response Center (NRC) c/o United States Coast Guard (Cg-5335) – Stop 7581 2100 2nd Street, SW Washington, DC 20593-0001	**(800) 424-8802** If no answer, call alternate number (202) 267-2675 Or call EPA Regional Office at (215) 814-9016	NRC should be notified of releases of oil to "Waters of the United States". NRC should be informed of the location of the spill, and the quantity and type of oil spilled.
Baltimore Police Department – Southwest District 424 Font Hill Avenue Baltimore, MD 21223	**911** (410) 396-2488	This police department is the closest and will respond to requests from the facility, during an incident requiring implementation of this plan. In an emergency, dial 911
Arbutus Volunteer Fire Department 5200 Southwestern Boulevard Halethorpe, MD 21227	**911** (410) 242-6601	The Arbutus Voluntary Fire Department will be the primary responder to any fire emergency. In an emergency, dial 9111
Saint Agnes Hospital 900 S Caton Avenue Baltimore, MD 21229	(667) 234-6000	This hospital will administer emergency care to any personnel requiring such during an accident.
The John Hopkins Hospital 1800 Orleans Street Baltimore, MD 21287	(410) 955-5000	Additional Hospital Assistance

When notifying MDE and NRC, the following information must be provided:

- Name and telephone number of person reporting;
- Name and address of facility;
- Time and type of incident (e.g., release, fire, etc.);
- Name and quantity of materials involved, to the extent known;
- Extent of injuries, if any; and
- Possible hazards to human health or the environment, outside the facility.

F4.1.2 SPILL OR RELEASE RESPONSE PROCEDURES

In the event of any imminent or actual emergency situation involving a spill or release covered by this Contingency Plan, facility personnel must follow the procedures in this section.

Note: if a spill or release cannot be controlled without personal risk, only properly trained and qualified personnel should be involved in the actual spill or release clean-up activities.

Steps to be taken during a spill:

- Immediately alert personnel whose health and safety are, or may be, immediately threaten by the emergency situation. Evacuate area if necessary.
- Immediately alert Supervisor and/or Operations Manager (Emergency Coordinator, in their absence).
- Isolate the area so that nobody unknowingly walks into the contaminated area (close doors, barricade tape, post other individuals at doors or hallways to warn others, signs, cones, etc.).
- If volatile, flammable material is spilled, control sources of ignition and ventilate area.
- Don PPE, as appropriate to the hazards. Consider the need for respiratory protection. Never enter a contaminated atmosphere without protection or use a respirator without training.
- If possible, stop spill/leak by using compression plugs or tilting drum/container on its side with damage area facing up. Large-sized containers may be used to over pack leaking containers, or the contents of the leaking container can be transferred to another container. Be sure to select compatible DOT-approved container(s) and properly label container(s) used.
- Contain and clean up the spill. Cleanup tools designated for that purpose (shovels, brooms, etc.) will be used to clean up the spill/leak.
- Complete and affix a waste label onto the container(s). Arrange for proper storage and disposal of the waste.
- Decontaminate the surface where the spill/leak occurred, using a mild detergent and water, when appropriate. Personnel are instructed to promptly remove any contaminated shoes or clothing, and to properly decontaminate themselves, if necessary. Spent absorbent material will be sent to a licensed hazardous waste disposal facility. Disposition of contaminated shoes and clothing will be determined by the Operations Manager.
- Replenish all spill response equipment and supplies.

For any emergency requiring outside assistance, a list of community emergency responders (police, fire, hospital, etc.) and their phone numbers are included in Section F2.1.1 above.

F5 EMERGENCY RESPONSE SYSTEMS AND EQUIPMENT

The notification systems and equipment listed below are provided to deal with emergencies.

Notification Systems

If evacuation is necessary, personnel will be notified to evacuate in an orderly fashion via the page system or by direct communication by the Operations Manager or Emergency Coordinator. An "All Clear" signal will be given when the fire has been extinguished and the safety of personnel is no longer endangered. The evacuation plan is provided in Section F6 entitled "EVACUATION PLAN".

A telephone is available in the office to summon the local police department, fire department, and/or state or local response teams. In addition to the telephone in the office, all personnel carry cellphones.

Fire Control Equipment

Fire extinguishers are located in several locations throughout the warehouse area and on every vehicle/trailer parked in the yard. EQNE contracts a Third-Party Vendor to inspect the fire extinguishers annually (every 12 months). The fire extinguisher locations are shown in Figure 4E of this SECTION.

Spill Control and Response Equipment

Each vehicle that carries waste material to or from the truck transfer area is equipped with a spill response kit. The contents of each spill kit include an over pack drum, sorbents and other materials used to contain accidental releases that may occur while containers are in transit. Additional spill response kits are stored at the facility. EQNE also maintains additional spill response material in our warehouse.

Equipment kept in spill kits must not be used except in an emergency and must be immediately replaced after use. Spill Response kits are inspected during site inspections.

A list of equipment and materials available at our facility is provided in Figure 4H.

Equipment Decontamination

The services of an outside contractor may be obtained to decontaminate structures or equipment in certain situations. The contractor will be responsible for supplying needed decontamination equipment.

First-Aid

First-Aid needed at the facility is available at Saint Agnes Hospital, (667) 234-6000, at 900 S Caton Avenue, Baltimore, MD 21229.

In addition, first-aid kits are available in the main office and in the warehouse within the facility.

F6 EVACUATION PLAN

This evacuation plan will work in conjunction with the EQNE Baltimore Facility Action Plan for any emergency situation that arises.

In the event an evacuation of the truck-to-truck transfer area is necessary, the following actions will be taken by employees.

NOTE: Responsibilities of the Supervisor, Operations Manager or Emergency Coordinator (in their absence) in connection with the evacuation set forth in Section F2 of this plan. In addition to the actions listed below, employees shall follow directions from the Operations Manager, or his/her designee.

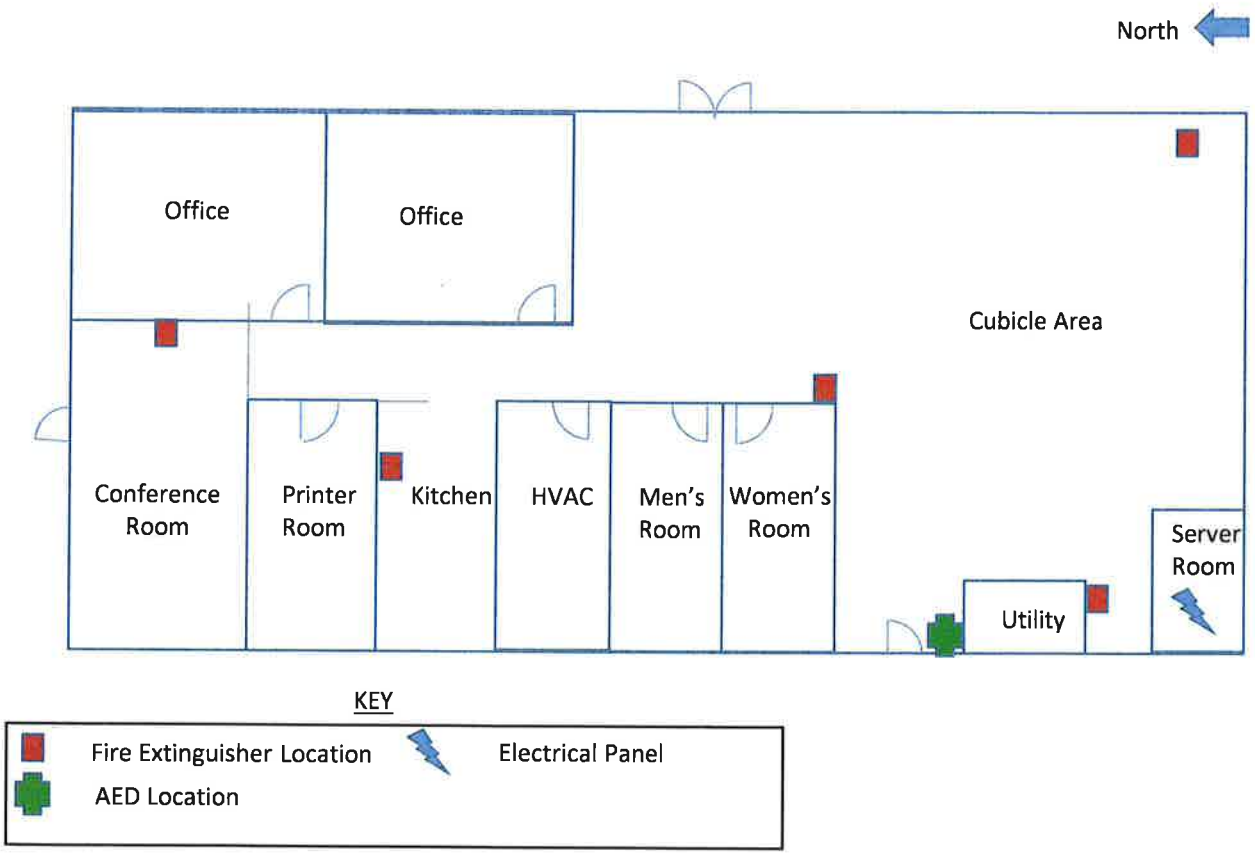
- A call for evacuation shall be initiated by verbal direct communication.
- No further entry of visitors, contractors or trucks shall be permitted. Non-essential traffic within the area shall cease to allow safe exit of personnel and movement of emergency equipment.
- Personnel shall exit the property.

- EQNE personnel will exit through the nearest exit and/or gate. In cases where the primary exit gate is blocked by releases of hazardous waste or fires, emergency personnel will redirect employees to an alternate exit.
- Evacuees shall report directly to the primary muster area outside the entrance gate located on the east side of the facility on Joh Avenue and await further instructions. Emergency personnel will redirect evacuees to the secondary muster should the situation warrant.
- No personnel shall remain, in or re-enter, the truck transfer area unless specifically authorized by the Operations Manager, or his/her designee.
- Re-entry into the area shall be made only after the Operations Manager or Emergency Coordinator gives clearance. At his/her direction, a signal or other notification shall be given for re-entry into the truck transfer area.

The steps outlined above will be taken by employees for evacuations due to fire, explosion risk and/or spill situations. Other emergency situations are outlined in detail within the EQNE Baltimore Facility Emergency Action Plan.

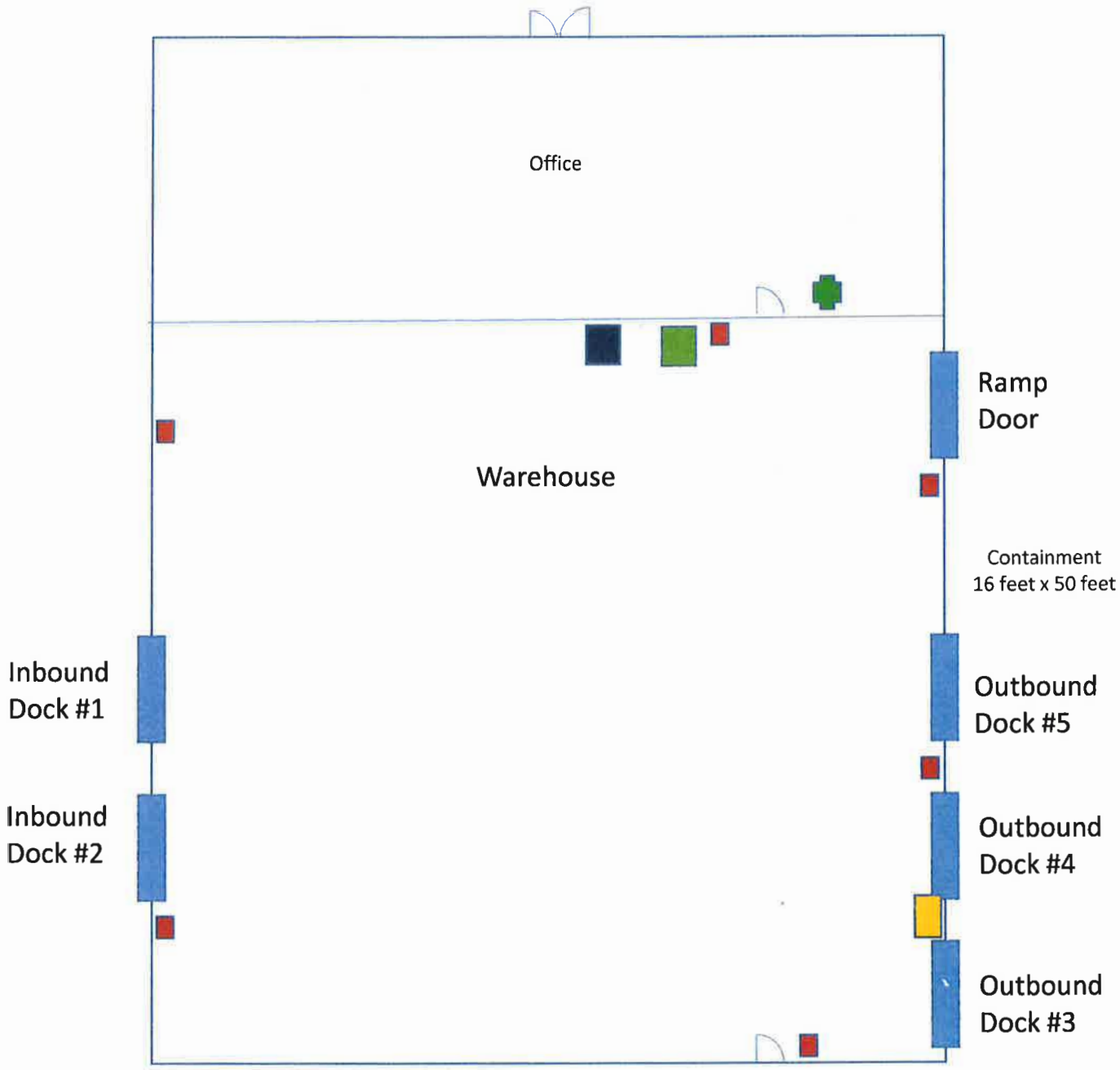
In questions of accountability, immediate supervisors shall be held responsible for those persons reporting to them. Visitors and/or contractors shall be the responsibility of employees within the immediate area in which they are located. Contractors are the responsibility of those persons administering the individual contracts. Truck drivers are the responsibility of the employees in the immediate area where the truck is loading/unloading.

Figure 6A: Location of Emergency Equipment



EQ Northeast, Inc.
CHS Permit: X-XXX
EPA ID No.: MDR000527703
Figure 6A: Location of Emergency Equipment

North



KEY

- Fire Extinguisher Location
- AED Location
- First Aid Kit
- Roll-Up Doors
- Container Storage Area
- Eyewash

1321 Joh Avenue, Baltimore MD 21227

EMERGENCY EQUIPMENT AND MATERIALS LIST

MATERIAL

QUANTITY	ITEM DESCRIPTION
2	Face shields
1	Non-sparking hammer
1	Non-sparking bung wrench
1	Speed wrench and socket
12	20-lbs. fire extinguisher, Type ABC
1	Eyewash station
2	First-Aid Kit
1	Explosion-proof flashlight
1	Roll caution tape
6	Hazardous waste container labels
1	NIOSH guidebook
1	DOT Emergency Response Guidebook
	Degreaser / Oil remover
	Citric Acid and Bicarbonate

EQUIPMENT

QUANTITY	ITEM DESCRIPTION
1	Vactor
1	Roll-off truck
	Roll=off Cans
	Shop Vacuums
100	Drums (various sizes)

EQ Northeast, Inc.
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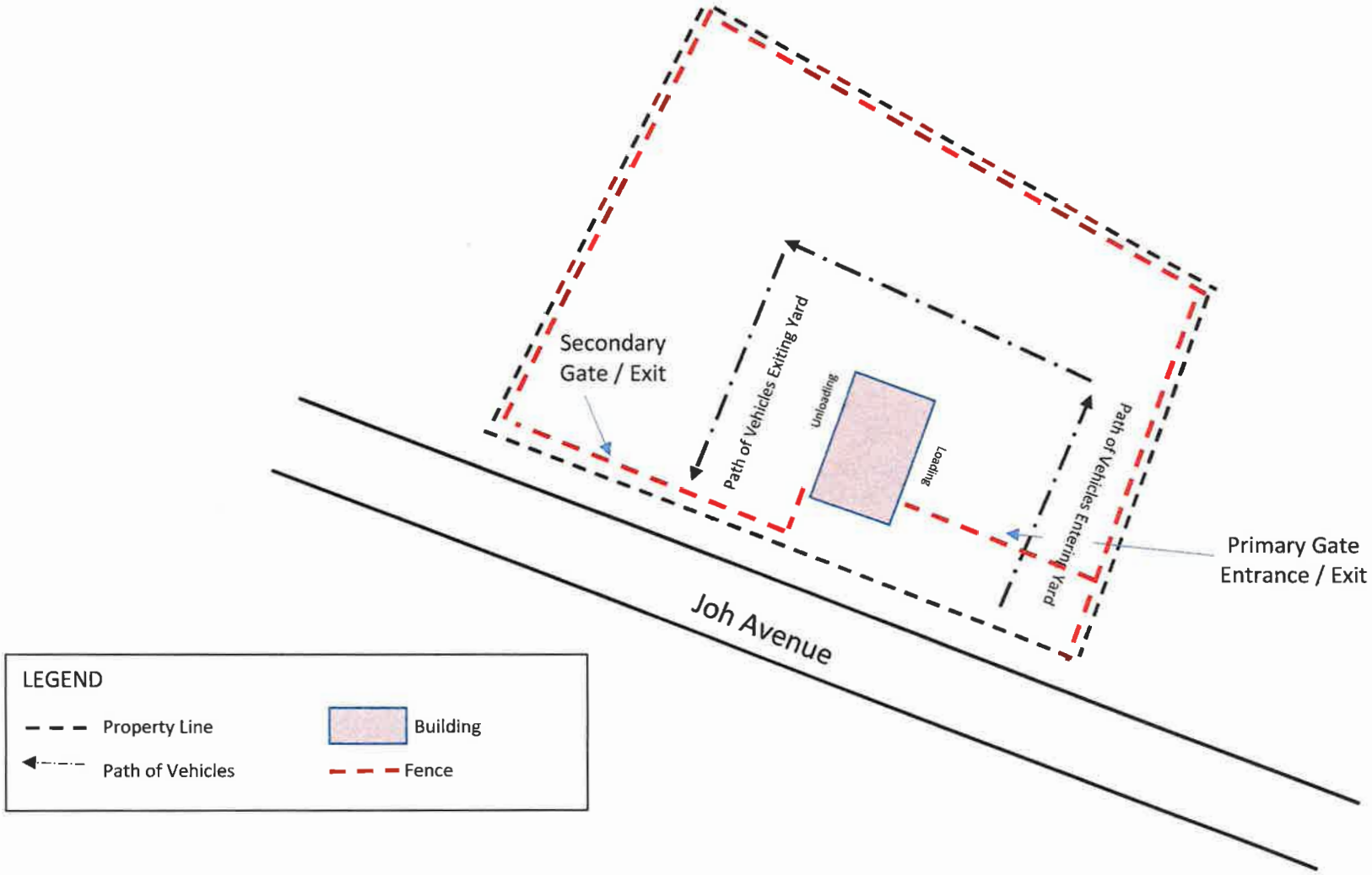
EPA ID No.: MDR000527703
Figure 1D: Site Layout and Traffic Pattern Map
Reference: HW Permit Information Form – Section 11



Revised: March, 3, 2021

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ATTACHMENT 5

Closure Plan

SECTION G: CLOSURE, POST CLOSURE PROCEDURES (COMAR 26.13.07 AND (H); COMAR 26.13.05.08) PLAN AND FINANCIAL REQUIREMENTS

G1 PURPOSE

EQNE Baltimore will be closed in accordance with the closure requirements of 40 CFR 264, Subpart G, COMAR 26.13.07.02D(29) and D(31); 26.13.05.07 A, b, C, D, E, F; and 26.13.05.08A.

G2 CLOSURE PLAN REQUIREMENTS

G2.1 CLOSURE PERFORMANCE STANDARD

This closure plan is designed in a manner that minimizes the need for further maintenance or controls. Controls, minimizes, or eliminates to the extent necessary to protect human health and environment, post closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or waste decomposition products to the ground water, or surface waters, or to the atmosphere, and complies with all federal and state regulations.

EQNE intends to use best management practices to minimize spills and releases throughout the life of the facility. The closure process will be simplified based on continual implementation of good housekeeping measures and a copy will be maintained on site. The plan includes:

- Closure Performance Standard
- Amendments to the Closure Plan
- Closure Notification
- Final Closure Schedule
- Waste Disposal and Equipment Decontamination
- Certificate of Closure

Upon completion of closure activities, the need for post closure maintenance will be minimized or eliminated.

G2.2. AMENDMENTS TO CLOSURE PLAN

EQNE will update the closure plan whenever necessary to maintain compliance with COMAR 26.13.05.07. EQNE will submit a written notice to the MDE to update the closure plan.

If EQNE, if at any time, submits a request for modification to this permit, the closure plan, including the closure costs, will be re-evaluated and any adjustments will be submitted as part of the requested modification.

G2.3 CLOSURE NOTIFICATION

EQNE will notify the MDE in advance of beginning closure activities in accordance with COMAR 26.13.05.07C(4).

G2.4 FINAL CLOSURE SCHEDULE

Once EQNE has notified the MDE, then the facility will no longer accept any waste for transfer. All customers and vendors will be notified of the closure by customer service personnel.

Within 30 days of receiving the final volume of hazardous waste(s), EQNE will remove all hazardous waste(s) from the site in accordance with the approved closure plan. EQNE will notify MDE prior to the date EQNE expects to begin closure. (COMAR 26.13.05.07C(4)(a)(ii)). Table 6E outlines the closure schedule.

Notification of closure will be carried out in accordance with COMAR 26.13.05.07C(4).

If, due to unforeseen circumstances, this schedule cannot be met, EQNE will communicate any delays with the MDE and determine an agreeable schedule for closure.

G2.5 ANTICIPATED INVENTORY

At the facility's maximum capacity, EQNE would expect that there would be 4 trailers on site with an estimated 360 containers total in addition to 25 containers stored in the container storage area.

G2.6 REMOVAL OF INVENTORY

Once notification has been made and waste receiving operations have ceased, the facility will begin the process of shipping all onsite inventory offsite for proper management. This will be tracked by utilizing the transfer logs, internal databases, and shipping papers.

G2.7 DECONTAMINATION OF HAZARDOUS WASTE STORAGE AREAS

EQNE will decontaminate and/or dispose of all contaminated equipment, structures as required by COMAR 26.13.05.07E. At the time of facility closure, EQNE will conduct a search of facility records to check for reference to any instances of spills or releases during the period that the facility was operating. Spills will be documented using the form Figure 4C, as well as the spill log in the facility Contingency Plan (Section F). This information on documented spills and release will be utilized to guide the selection of appropriate decontamination methods and appropriate protocols for sampling and analysis at the time of final closure. The nature of any releases that occurred during facility operations, and the details of the responses that were made to those releases will guide the selection of appropriate methods and protocols for the purpose of meeting the closure performance standard of COMAR 26.13.05.07B and demonstrating that the performance standard has been met. No heavy equipment will require decontamination. Decontamination rinseate generated during decontamination of the hazardous waste management area will be removed by the cleaning contractor in a tank truck rather than in drums.

When all containers have been removed from the facility, EQNE will begin cleaning the warehouse storage area and the outdoor unloading dock and containment area. The storage area in the warehouse and the outdoor areas will be power washed. All wash water will be collected utilizing a vacuum truck or similar equipment.

Many items of equipment will require no cleaning. Forklifts, drum handlers, box trailers and box vans do not contact waste, and therefore do not require cleaning. Equipment that is not included in the lease of the building and is owned by EQNE will be removed from the site within the agreed upon schedule.

All wash waters that are produced as a result of the cleaning operations will be collected and containerized. A vacuum truck, or the like, will be utilized to collect the majority of the wash water. Additional containers may be utilized, if necessary.

G2.8 OUTDOOR SECONDARY CONTAINMENT AREAS

If the secondary containment area(s) outdoors have the potential to accumulate storm water after closure, then the containment structures will be disassembled as part of the closure plan. EQNE will also review the site's inspection log, history of incidents in the containment area, and the condition of the containment area at the time of closure to determine if additional steps would be necessary to ensure that no contamination has migrated out of the containment area.

G2.9 SAMPLING AND ANALYSIS DECONTAMINATION OF CLEANUP EQUIPMENT

All equipment used for the closure of the facility will be properly decontaminated prior to its reuse. Small equipment (such as mops, rags, etc.) and their residue that cannot be reused will be transported to a licensed hazardous waste management facility. Sampling and analysis will be confined to samples collected for waste characterization of decontamination fluids.

G2.10 TREATMENT AND DISPOSAL

Wash water from the facility and equipment decontamination will be collected in a designated container specified for decontamination fluids. Samples will be collected and analyzed for hazardous waste characteristics. Based on the sample results, the wash water will be transported to a wastewater treatment facility or RCRA permitted disposal facility.

G2.11 FACILTY CLOSURE SCHEDULE AND CERTIFICATION

Within 30 days of receiving the final volume of hazardous waste(s), EQNE will remove all hazardous waste(s) from the site in accordance with the approved closure plan.

G2.12 NOTIFICATION OF CLOSURE

EQNE shall notify the MDE at least 45 days prior to the date EQNE expects to begin closure (COMAR 26.13.05.07C(4)(a)(ii)). EQNE will take all steps necessary to decontaminate the facility and will submit a closure certificate to the MDE within 60 days of beginning closure activities. Information on spills and releases, and responses that were made to address them, will be included in the final closure report that will be submitted to the MDE. The report will be reviewed by a professional engineer registered in the State of Maryland to demonstrate compliance with the approved closure plan. Table 6E outlines the closure schedule.

The certification will be signed by the operator, EQNE, and an independent registered professional engineer. Documentation supporting the proper closure of the facility will be a part of the submission of the registered professional engineer.

Table 6E

Activity	45 Days Prior	Weeks 1 & 2	Weeks 3 & 4	30 Days	Weeks 5 & 6	Weeks 7 & 8	60 Days
NOTIFY MDE OF INTENT TO CLOSE	X						
PREPARE FOR CLOSURE ACTIVITIES		X					
DEADLINE TO STOP RECEIVING WASTE		X					
BEGIN CLOSURE		X	X				

Activity	45 Days Prior	Weeks 1 & 2	Weeks 3 & 4	30 Days	Weeks 5 & 6	Weeks 7 & 8	60 Days
SHIP ALL WASTE CONTAINERS OFF SITE FOR FINAL DISPOSAL				**X**			
DECONTAMINATE ALL SURFACES AND TRANSFER AREAS					**X**		
COLLECT AND ANALYZE SAMPLES					**X**		
RECEIVE SAMPLE RESULTS						**X**	
SUBMIT CLOSURE REPORT TO PE FOR PREVIEW AND CERTIFICATION						**X**	
DEADLINE FOR SUBMITTING CLOSURE CERTIFICATE REPORT TO MDE, WLA							**X**

G2.13 COST ESTIMATE AND FINANCIAL ASSURANCE

The cost estimate for the closure of the facility is $56,375, based on the closure cost estimate provided by Broadview Waste Solutions. A copy of the complete cost estimate is attached.

G2.14 ANNUAL UPDATES TO CLOSURE COSTS

During the active life of the facility, the closure cost estimate will be adjusted annually to reflect inflation, in accordance with, and as required by 40 CFR 264.142(b), which has been incorporated by reference into COMAR 26.13.05.08. EQNE will adjust the closure cost estimate for inflation prior to the anniversary date of the establishment of the financial instrument used to comply with financial assurance.

G2.15 FINANCIAL INSTRUMENT

EQNE has selected an irrevocable standby letter of credit and standby trust fund for financial assurance for closure of the facility. EQNE's financial assurance documentation will be submitted upon approval of the closure cost estimate.

G2.16 PROOF OF LIABILITY COVERAGE FOR SUDDEN ACCIDENTAL OCCURRENCES

EQNE maintains a Hazardous Waste Faciality Certificate of Liability Insurance as required under COMAR 26.13.05.08. EQNE will provide a copy of the financial assurance before the cleanup operation begins.

BWS
Broadview Waste Solutions

7609 Energy Parkway, Suite 1001 Baltimore, MD 21226
O: (410) 437-6590 I F: (410) 437-6595
www.broadviewwaste.com

January 12, 2022

Ms. Paula Cabral
EHS Manager
US Ecology
1321 Joh Avenue
Baltimore, MD 21227

Re: Proposal for Closure of the 1321 Joh Ave. 10-day TSDF

Dear Ms. Cabral:

Per our conversations regarding the cost estimate for the closure of the 10-day TSDF located at 1321 Joh Avenue, Baltimore, MD 21227, information, and pricing follows.

Pricing is budgetary and based on market rates at the time of the proposal. Prices will be subject to change over time.

Broadview Waste Solutions will work closely with US Ecology in order that they will comply with the closure requirements of 40CFR264, Subpart G, COMAR 26.13.07.02D(29), and D(31): 26.13.05.07 A, b, CDEF; and 26.13.05.08A.

Initial steps performed by US Ecology will be notification to the MDE of the intent to close; preparation of closure activities; and setting a deadline to stop receiving waste. All wastes will then be shipped off site for final disposal. The transfer areas will then be swept with all loose debris placed into 55-gallon drums. All surfaces will then be pressure washed with all rinse water collected and stored in 55-gallon drums on site. Samples will be collected of the wash water and floor debris will be sent to a third-party environmental laboratory for waste characterization. Upon receipt of the analytical results prepare a closure report and submit it to a Professional Engineer for certification. Transport and dispose of drums of floor debris and wash water at a licensed and permitted TSDF.

See attached list of itemized costs. Please contact me with any questions at 410-844-1280.

Sincerely,

Eric Kass
President

G2.13 COST ESTIMATE AND FINANCIAL ASSURANCE

The cost estimate for the closure of the facility is $XX,XXX, based on the closure cost estimate assumptions listed in Table 6F.

Table 6F

	Item	Unit of Measure	Amount	Cost	Total Cost
1.	Drum Removal	Per Drum	10	350	3500
2.	Dry Sweep Storage, Process and Handling Areas	1,000 sq. feet	1000	$3.9 sf	3900
3.	Removal of Waste and Loose Debris Total 2 x 55	Per Containment Area	1	2000	2000
4.	Decontamination of Unit by Pressure Washing	Number of Hours	16	$500	8000
5.	Contain Decontamination Fluid 8 x 55	Number of Drums	10	200	2000
6.	Decontamination Total	Per Unit	1		19,400
7.	TCLP Volatiles by EPA 1311/8260 (Includes leachate)	Per Sample	2	$240.00	$480.00
8.	TCLP Semi-Volatiles by EPA 1311/8270 (Includes leachate)	Per Sample	2	$290.00	$580.00
9.	TCLP RCRA Metals EPA 1311/6010/7470	Per Sample	2	$250.00	$500.00
10.	TCLP Pesticides EPA 1311/8081	Per Sample	2	$180.00	$360.00
11	TCLP Herbicides EPA 1311/8151	Per Sample	2	$325.00	$750.00
12.	Reactive Cyanide EPA 7.3.3.2	Per Sample	2	$260.00	$520.00
13.	Reactive Sulfide EPA 7.3.4.2	Per Sample	2	$260.00	$520.00
14.	Polychlorinated Biphenyls EPA 8082	Per Sample	2	$160.00	$320.00
15.	Ignitability EPA 1010A	Per Sample	2	$150.00	$300.00
16.	Corrosivity EPA 9045C	Per Sample	2	$25.00	$50.00

	Item	Unit of Measure	Amount	Cost	Total Cost
17.	Oil and Grease HEM EPA 1664A	Per Sample	2	$140.00	$280.00
18.	Labor and Equipment Cost to Collect Decontamination Fluid Samples (Level D PPE)	Cost Per Hour	4	$150.00	$600.00
19.	Total Oily Wastewater Analysis Cost	Per event	1	750	750 —
20.	Total Sampling and Analysis Cost	Per Event	1		$6010 —
21.	Treatment and Disposal of Hazardous Waste Transportation	Cost Per Mile 160 Miles RT	160	12.50	2000 —
22.	Treatment and Disposal of Waste	Cost Per Ton	20	500	10,000
23.	Treatment and Disposal of Waste	Cost Per Ton	20	500	10,000
24.	Total Cost of Treatment and Disposal	Cost Per Unit			22,000 —
25.	Transportation of Drum Waste	Cost Per Mile	160	24	3840 —
26.	Total Transportation Cost	Cost Per Truck	1	3840	3840 — —
27.	Certifying Professional Engineer Cost	Per Closure Event	1	10,000	$10,000
28.	Certificate of Closure	Per Event	1	525	525 —
29.	Closure Subtotal				51,250 — —
30.	Contingency Allowance			10%	5125
	Total Closure Cost				56,375 —

A Define Oily Wastewater

G2.14 ANNUAL UPDATES TO CLOSURE COSTS

During the active life of the facility, the closure cost estimate will be adjusted annually to reflect inflation, in accordance with, and as required by 40 CFR 264.142(b), which has been incorporated by reference into COMAR 26.13.05.08. EQNE will adjust the closure cost estimate for inflation prior to the anniversary date of the establishment of the financial instrument used to comply with financial assurance.

G2.15 FINANCIAL INSTRUMENT

~~EQNE has decided to use closure insurance as the financial assurance instrument to cover the costs of closing the facility. Proof of appropriate coverages can be found in Figure 7B.~~

EQNE has selected an irrevocable standby letter of credit and standby trust fund for financial assurance for closure of the facility. EQNE's financial assurance documentation will be submitted upon approval of the closure cost estimate.

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ATTACHMENT 6

Process Information

SECTION B: PROCESS DESCIPTION

The information provided in this section is submitted in accordance with the requirements of COMAR 26.13.07.02D (13) & (14), COMAR 26.13.07.02-2, and COMAR 26.13.05.09.

EQNE only transfers hazardous waste containers that it is permitted to handle according to SECTION H (Part A License Application, EPA Form 8700-23). Hazardous and nonhazardous wastes arrive at the transfer area and are loaded on trucks. Containers are transferred between trucks and trailers and held on site for 10 days or less. The maximum volume of waste that is held at the transfer area at any time is limited to a total of 19,800 gallons. EQNE's transfer operation is subject to regulatory requirements for CHS transporters and is performed according to the procedures and plans referenced in Appendices C, D and E.

- The truck transfer area is at three designated dock doors located on the west side of the facility warehouse. The concrete outside of the designated dock docks will be surrounded by a containment berm. All movement of containers between trailers will happen at this location. The design, operation, and capacity of the bermed area outside the designated dock doors is described in Section B3. Containers are labelled and marked in a manner that reflects the chemical hazard within and segregated on trucks according to the DOT regulations found at 49 CFR 177.848.

- In the event that there is a small excess of containers that do not fit into the transfer truck or trailer, EQNE will store the containers in the designated containment area located between the Dock Doors 3 & 4. The design, operation, and capacity of the bermed area outside the designated dock doors is described in Section B3. The maximum volume of waste that is held in the storage containment area at any time is limited to 20 containers. Flammable waste will not be stored in the interior containment storage area. The storage containment area will have a two-foot aisle for accessibility to the containers stored within.

- EQNE will park outbound trailers in the designated areas onsite. The trailers will be organized by disposal and/or recycling facility destination. These trailers will be inspected as outlined in Section D2. Trailers that are holding containers of ignitable or reactive wastes will be located at least 15 meters from the property line.

All containers will be marked and labelled in a manner that reflects the chemical hazard within and properly segregated on trailers according to the DOT regulations found at 49 CFR 177.848.

Copies of the manifests and other shipping papers for any transferred waste shall be readily accessible and maintained in the office area.

B1 CONTAINERS

Containers to be managed at the facility range in size from small sample containers to 330-gallon totes. Containers are inspected prior to loading at generator to ensure that they are free of any deficiencies. Any containers identified with deficiencies are not shipped. EQNE team members use drum dollies, pallet jacks or other mechanical devices to move closed containers from arriving trucks directly to the transfer truck or trailer. Team members evaluate each container before, during, and after each transfer. Containers are checked to ensure proper closure, proper UN rating and general condition. If a container holding hazardous waste should begin leaking, or is otherwise found to be in poor condition, it will be over packed into a larger compatible container.

B2 TRANSFER LOG

EQNE will maintain a log of all hazardous waste containers that are transferred between trucks and trailers as well as stored in the designated containment area. The following information is documented for each shipment that passes through the truck transfer area:

- Generator name; and
- Shipping paper or trip number; and

- The date the container is arrives at the facility;
- The date that the container is out bounded to the proper facility, and
- Container count.

B3 SECONDARY CONTAINMENT SYSTEM DESIGN AND OPERATION

EQNE has two distinct containment areas: one exterior at the outbound truck transfer docks area and one interior as a container storage area. All container transfer activity will be conducted by offloading trucks at Dock Doors 1 and 2 located on the east side of the warehouse, and loading outbound trailers parked at Dock Doors 3, 4, and 5 located on the west side of the facility warehouse. The warehouse concrete floor and dock pad are free of cracks or gaps and are sufficiently impervious to contain leaks or spills.

- The exterior secondary containment area will be located on the west side of the building. The containment will be made of an asphalt drive over berm that will be constructed in a manner capable of containing ten percent of the total volume of material stored at the outbound docks. Any cracks in the concrete and asphalt will be sealed including where the concrete meets the building. The asphalt and concrete areas will also be sealed to ensure the surfaces are impervious to contain leaks or spills.

  During inclement weather events, precipitation may collect in the containment area. EQNE will manage any accumulating water in the containment area based on the applicable regulations, inspection results, and any leaks or spills in the containment. EQNE will perform inspections of containment per the requirements in Section D3.

- The interior warehouse area is located between Dock Door 3 and Dock Door 4 and is protected from the weather elements. The floor of the container storage area is constructed of concrete and all cracks and seams will be sealed. The area will have a drive-over berm installed on three sides with the dock wall on the fourth side. The berm will be adhered to the floor and sealed in a manner to prevent leaks. The containment will be approximately ten feet by eleven feet with a four-inch berm. This containment will have a capacity to hold approximately 250 gallons of material. The bermed area has a capacity of 10% of the total volume of containers that EQNE is permitted to store in the area. No container larger than a 250-gallon tote will be stored at any given time in the interior containment storage area. Signs will be posted at the interior containment storage area as a reminder to EQNE personnel of the maximum size container allowed.

ATTACHMENT 7

Facility Description

SECTION A: FACILITY DESCRIPTION

The information provided in this SECTION is submitted in accordance with the requirements of COMAR 26.13.05.02B, COMAR 26.13.05.02-1, and COMAR 26.13.07.02D.

A1 GENERAL DESCRIPTION

EQ Northeast, Inc. is a CHS facility located at 1321 Joh Avenue in Baltimore, Maryland. The EPA ID number associated with this CHS facility is MDR000527703. The facility coordinates are 39° 26' 22" (Latitude), -76° 67' 38" (Longitude) and is located in Baltimore City, District 40.

A wide variety of hazardous and nonhazardous waste in various sized containers will be transferred between trucks and trailers at EQNE. Licensed CHS haulers will conduct all waste shipments to and from EQNE. Containers of hazardous waste will be transferred and remain on trucks and trailers located at EQNE for up to 10 days and shipped for proper disposal. EQNE is not authorized to treat or dispose of hazardous waste at the facility.

On occasion, EQNE will store up to 20 drums of hazardous or nonhazardous waste in the designated containment area between the cross-dock transfer dock doors. Dock Doors 1 & 2 are located along the East wall of the warehouse and Dock Doors 3 to 5 are located along the West warehouse wall.

The routine activities and operations performed at EQNE's truck transfer and containment areas are described in SECTION B of this permit.

A2 PROPERTY DESCRIPTION

EQNE's property located at 1321 Joh Avenue, Baltimore is a parcel of land that is identified by the Maryland Department of Assessments and Taxation as Ward 25, Section 02, Block 7698, Lot 008. City records indicate that property is zoned as industrial and is approximately two (2) acres in size; the building is 6917 sq. ft.

The site is surrounded by industrial properties on the west, north and south sides with an overpass on the east side. Sensitive receptors such as home, schools, hospitals, nursing homes, and daycare centers are located beyond a 1,000-foot radius of the site. A map depicting legal boundaries of the property and the surrounding land uses has been provided as Figure 1B.

EQNE is located outside the 100-year Flood Plan, as indicated in Figure 1C.

The EQNE truck transfer area consists of a bermed, concrete containment area outside Dock Doors 3 to 5 where the trucks/trailers will be staged. The containment area is approximately 600 square feet (50 feet by 12 feet) in size and is located directly outside of the designated transfer dock doors. The maximum capacity of waste that is held at the transfer area at any time is limited to a total of 19,800 gallons. A scale drawing of the facility which indicates structures, barriers, loading/unloading areas, access controls and treatment, disposal and storage units has been provided as Figure 1D in this permit.

The interior storage containment will be approximately ten feet by eleven feet with a four-inch berm which creates a containment storage maximum volume of 274 gallons. The maximum volume of waste that is held in the interior storage containment area at any time is limited to 20, 55-gallon drums or one 250-gallon tote.

A3 OWNER/OPERATOR INFORMATION

EQ Northeast, Inc. is the operator of the facility located at 1321 Joh Avenue, Baltimore, MD. The property is owned by Benson / Joh Avenue, LLC. EQNE is a subsidiary of US Ecology, Inc., a publicly traded corporation headquartered in Boise, Idaho. The names and addresses of shareholders, officers and directors of US Ecology are provided in Table 1A.

A4 WASTEWATER MANAGEMENT

EQNE has filed for a "No Exposure Notification" from NPDES stormwater requirements. This grants the facility an exclusion from permitting under the conditions imposed by the EPA's Phase II Stormwater Program. This exclusion, granted under 40 CFR 122.26, does not require EQNE to specifically manage the storm water which collects within the exterior bermed and containment areas for the outbound dock doors #3 through #5. Containment details are discussed in Section B3. EQNE will collect, operate properly characterize, and transport collected storm water for proper disposal whenever a spill occurs in the containment area.

A5 AIR QUALITY

EQNE does not treat or dispose of hazardous waste at the facility. EQNE does not commingle or consolidate the contents of hazardous waste containers into other containers or receptacles at this facility. All hazardous waste containers managed at the truck transfer station or stored in the containment area are sealed prior to the arrival at the facility and will remain closed until they are transported off site to destination TSDF facilities. There are no "emission units" (as defined in COMAR 26.11.17.01B (11)) located at the EQNE truck transfer and storage containment areas.

EQNE's facility yields no emission (fugitive or otherwise) that would require EQNE to register as a major or minor source of NSR pollutants.

A6 PHOTOGRAPHS

Photographs of the facility as required by COMAR 26.13.07.02D (12) are included Figure 1F.

A7 PRE-APPLICATION MEETING

EQNE will host a pre-application meeting in accordance with COMAR 26.13.07.19-1B (2). Documents relevant to this meeting will be included in Figure 1G.

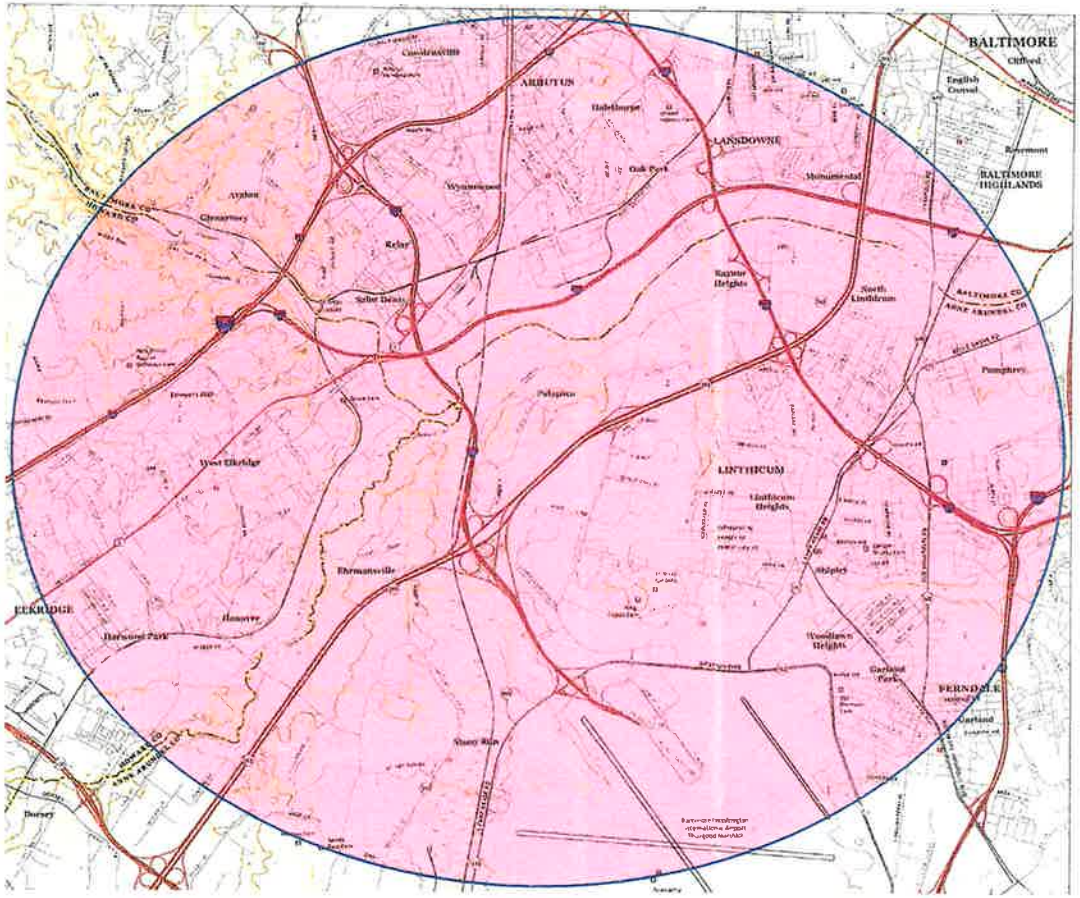
EQ Northeast, Inc.
CHS Permit: X-XXX
EPA ID No.: MDR000527703
Figure 1A: Topographical and Wind Rose Map

Topographical Map

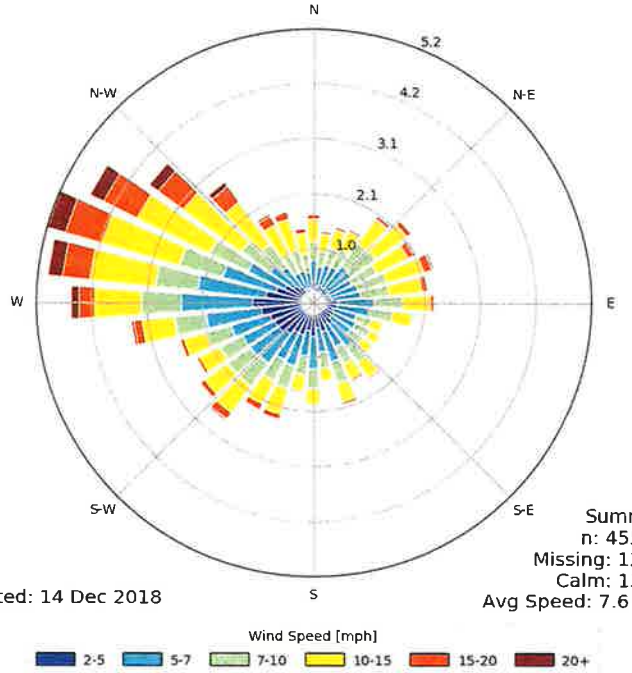
Image Source: https://www.pickatrail.com/topo-map/
Date: 02/21/2020

Wind Rose Map

Image Source: http://mesonet.agron.iastate.edu
Date: 02/19/2020



[BWI] BALTIMORE/WASH INTL
Windrose Plot [All Year]
Period of Record: 01 Jan 1970 - 14 Dec 2018



Generated: 14 Dec 2018

Summary
n: 455071
Missing: 12030
Calm: 13.4%
Avg Speed: 7.6 mph

Wind Speed [mph]
2-5 5-7 7-10 10-15 15-20 20+

EQ Northeast, Inc.
CHS Permit: X-XXX
EPA ID No.: MDR000527703
Figure 1C: Flood Map
Reference: HW Permit Information Form Section - 10

39° 26' 22" (Latitude), -76° 67' 38" (Longitude)

National Flood Hazard Layer FIRMette

FEMA

Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS
- Without Base Flood Elevation (BFE) Zone A, V, A99
- With BFE or Depth Zone AE, AO, AH, VE, AR
- Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD
- 0.2% Annual Chance Flood Hazard, Area of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone
- Future Conditions 1% Annual Chance Flood Hazard Zone X
- Area with Reduced Flood Risk due to Levee. See Notes. Zone X
- Area with Flood Risk due to Levee Zone D

OTHER AREAS
- NO SCREEN Area of Minimal Flood Hazard Zone X
- Effective LOMRs
- Area of Undetermined Flood Hazard Zone

GENERAL STRUCTURES
- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

OTHER FEATURES
- 20.2 / 17.5 Cross Sections with 1% Annual Chance
- Water Surface Elevation
- Coastal Transect
- Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature

MAP PANELS
- Digital Data Available
- No Digital Data Available
- Unmapped

N

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

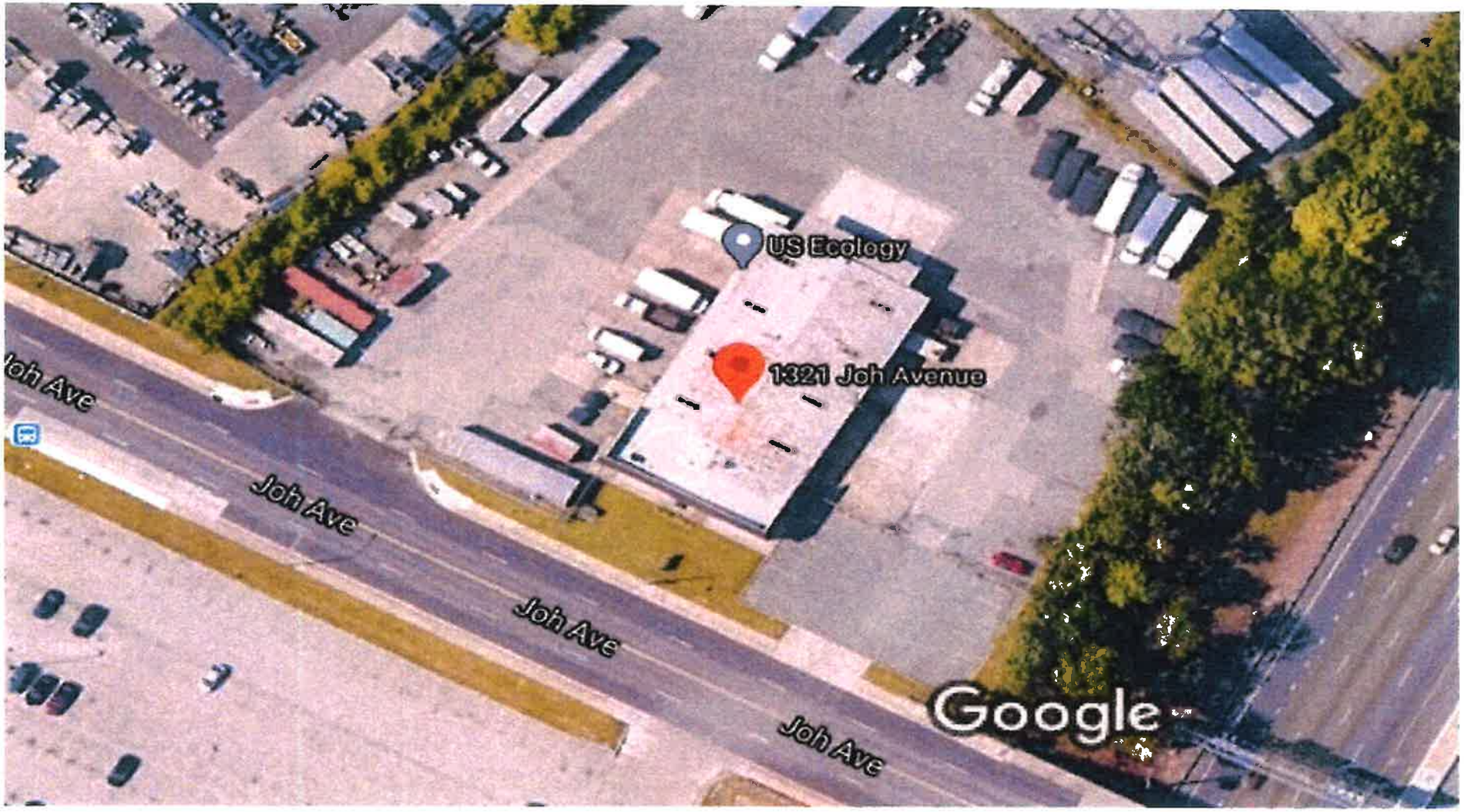
This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 3/2/2021 at 3:21 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

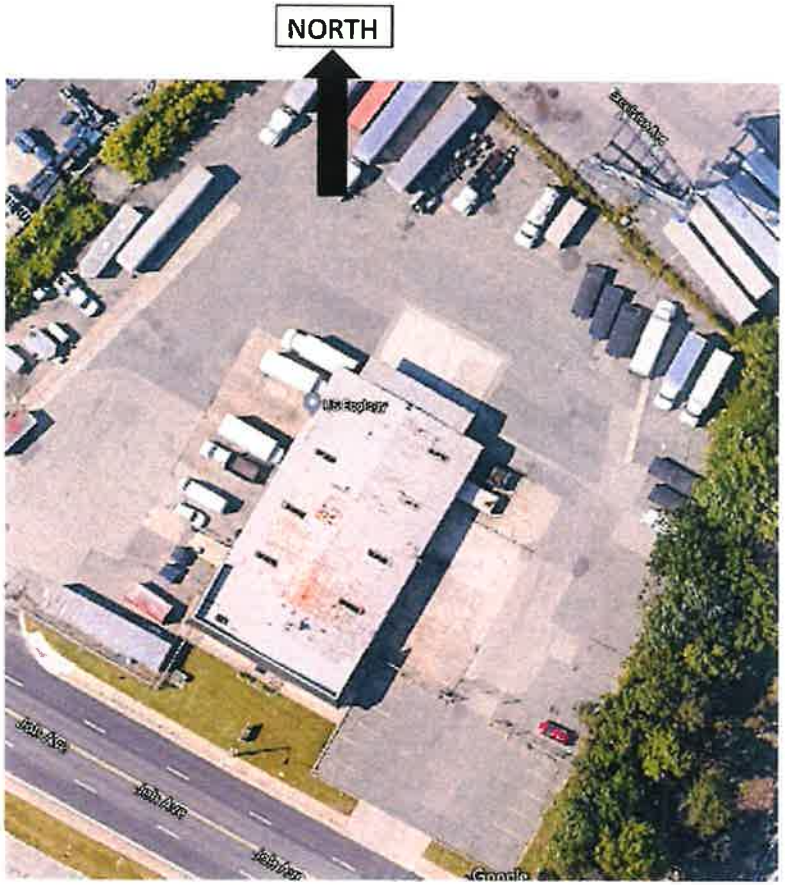
EQ Northeast, Inc.
CHS Permit: X-XXX
EPA ID No.: MDR000527703
Figure 1E: Aerial Photograph Map
Reference: HW Permit Information – Section 10

Image Source: https://www.google.com/maps
Date: 02/21/2020
39° 26' 22" (Latitude), -76° 67' 38" (Longitude)



US ecology

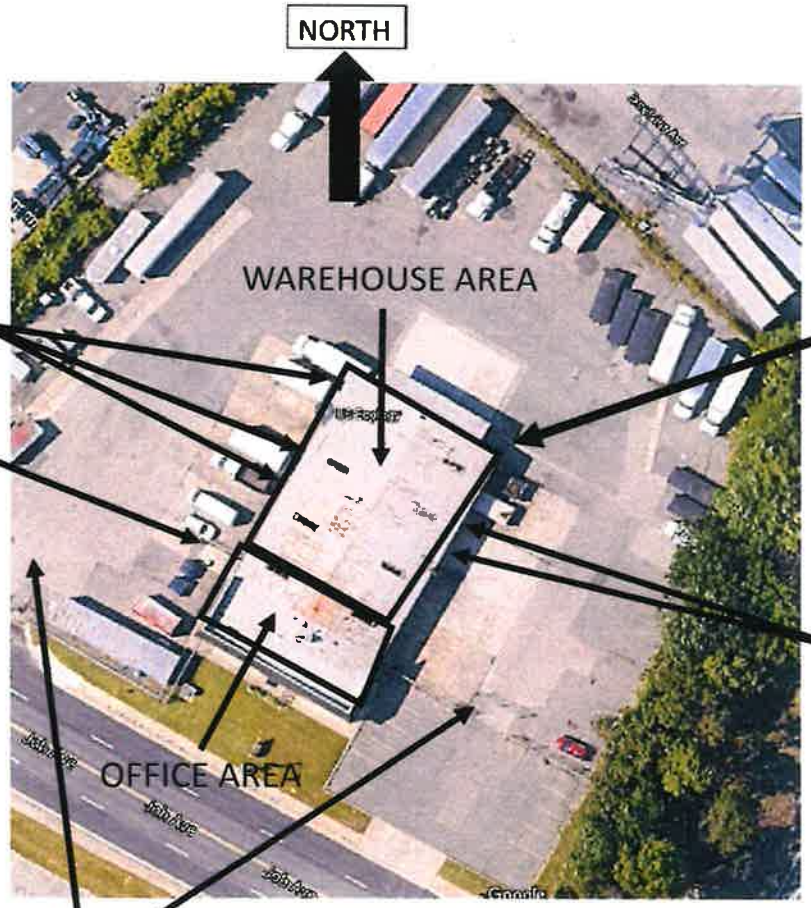
EQ Northeast, Inc.
CHS Permit: X-XXX
EPA ID No.: MDR000527703
Figure 1F: Photographs



Google Earth view shows building after the fire and before renovations. Note holes in roof that has since been repaired. The temporary office trailer on the front lawn is no longer on the premises.

US ecology

EQ Northeast, Inc.
CHS Permit: X-XXX
EPA ID No.: MDR000527703
Figure 1F: Photographs

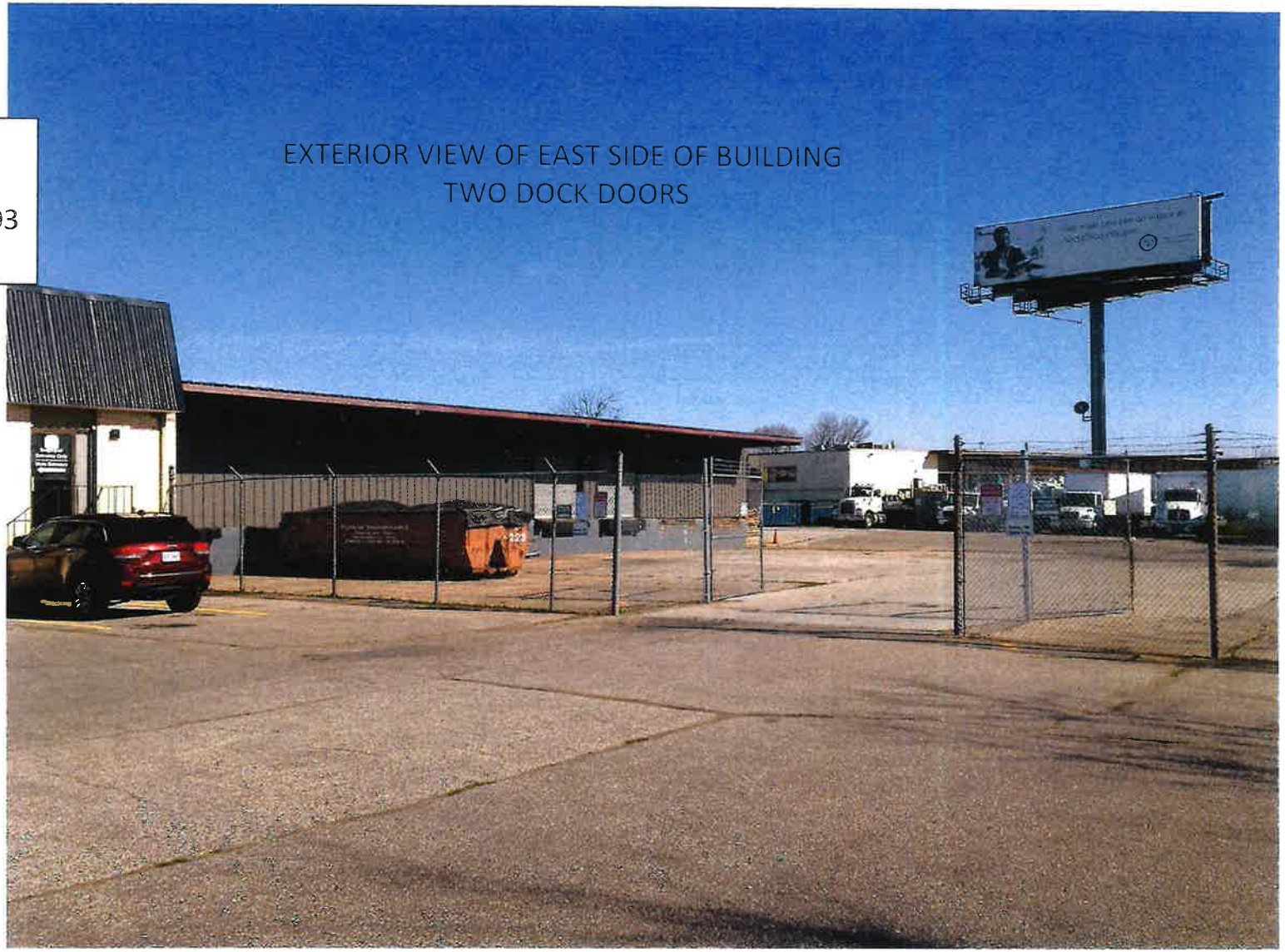


Google Earth view shows building after the fire and before renovations. Note holes in roof that has since been repaired. The temporary office trailer on the front lawn is no longer on the premises.

US ecology

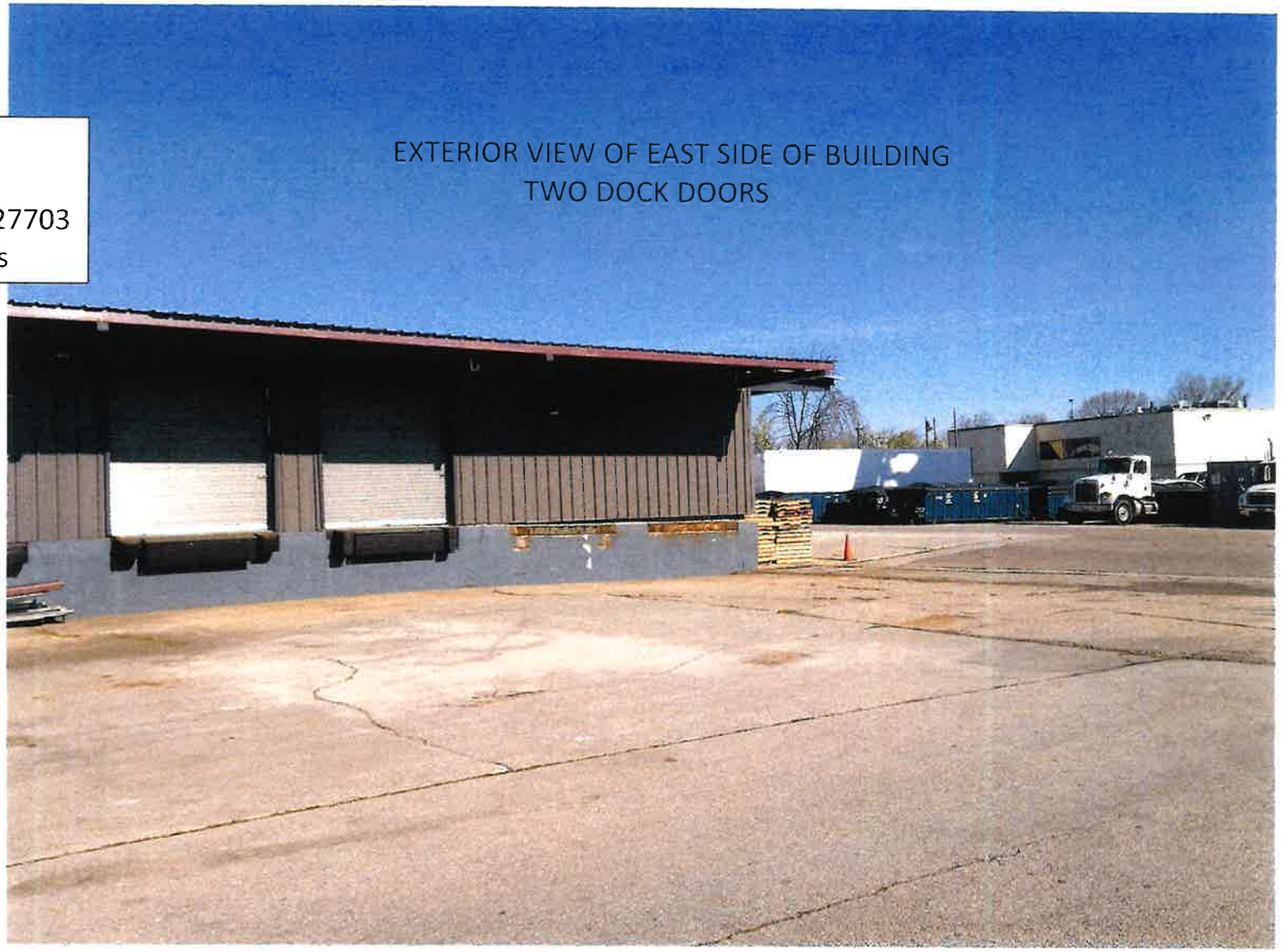
EQ Northeast, Inc.
CHS Permit: X-XXX
EPA ID No.: MDR000527703
Figure 1F: Photographs

EXTERIOR VIEW OF EAST SIDE OF BUILDING
TWO DOCK DOORS



EQ Northeast, Inc.
CHS Permit: X-XXX
EPA ID No.: MDR000527703
Figure 1F: Photographs

EXTERIOR VIEW OF EAST SIDE OF BUILDING
TWO DOCK DOORS



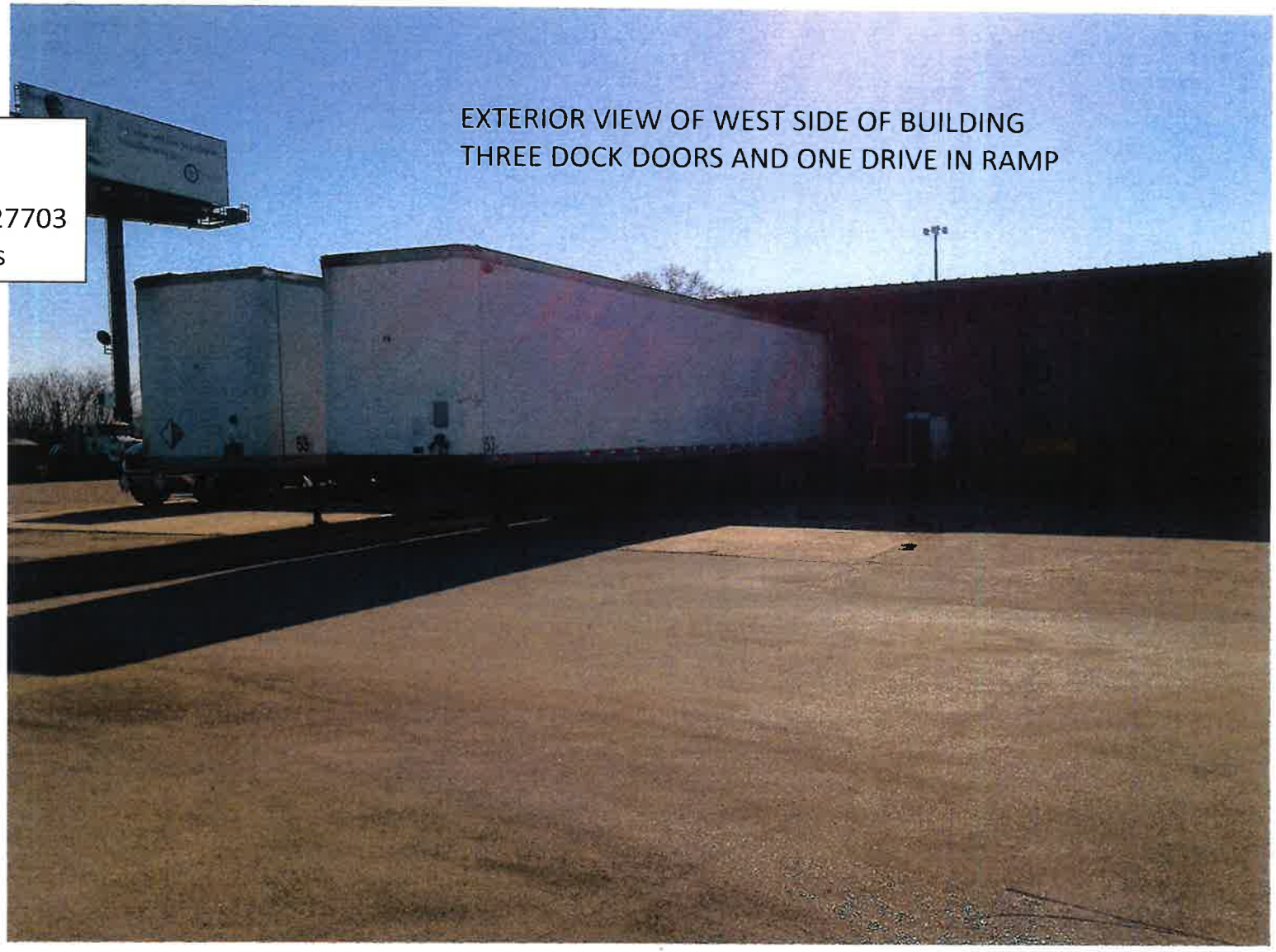
US ecology

EQ Northeast, Inc.
CHS Permit: X-XXX
EPA ID No.: MDR000527703
Figure 1F: Photographs

INTERIOR VIEW OF THE
TWO DOCK DOORS ON THE
EAST SIDE OF THE BUILDING
INBOUND DOORS

US ecology

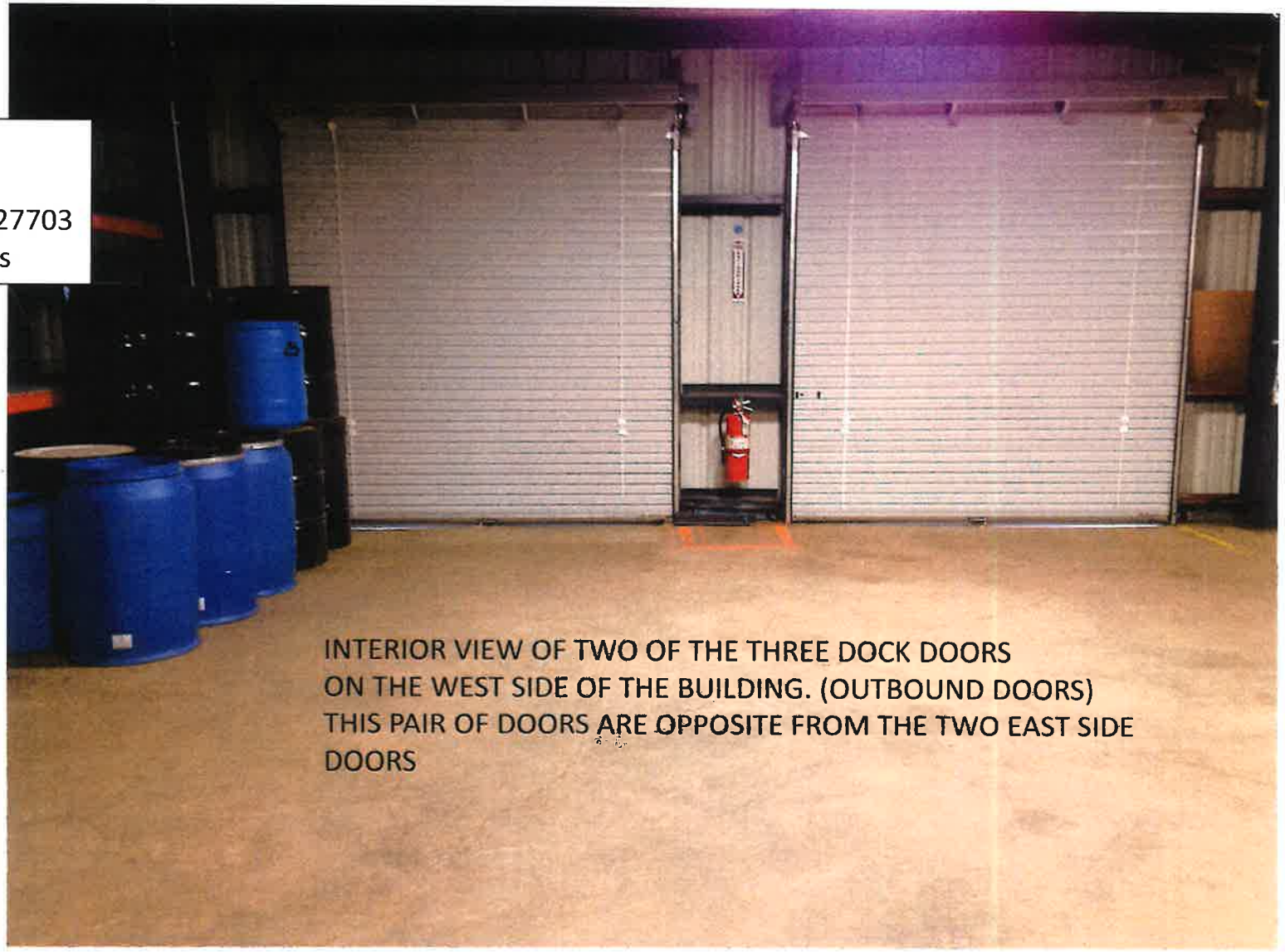
EQ Northeast, Inc.
CHS Permit: X-XXX
EPA ID No.: MDR000527703
Figure 1F: Photographs



EXTERIOR VIEW OF WEST SIDE OF BUILDING
THREE DOCK DOORS AND ONE DRIVE IN RAMP

US ecology

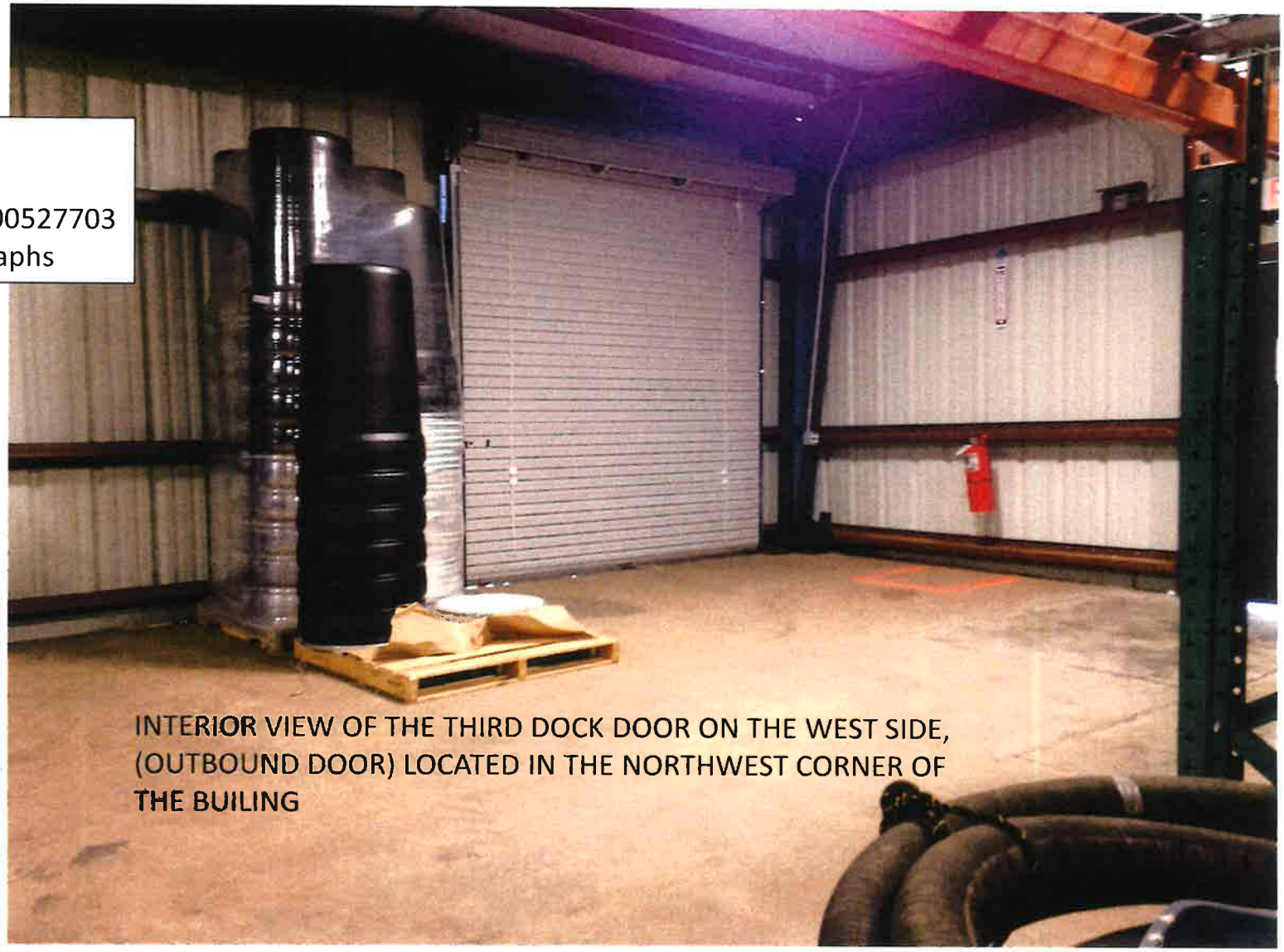
EQ Northeast, Inc.
CHS Permit: X-XXX
EPA ID No.: MDR000527703
Figure 1F: Photographs



INTERIOR VIEW OF TWO OF THE THREE DOCK DOORS ON THE WEST SIDE OF THE BUILDING. (OUTBOUND DOORS) THIS PAIR OF DOORS ARE OPPOSITE FROM THE TWO EAST SIDE DOORS

US ecology

EQ Northeast, Inc.
CHS Permit: X-XXX
EPA ID No.: MDR000527703
Figure 1F: Photographs

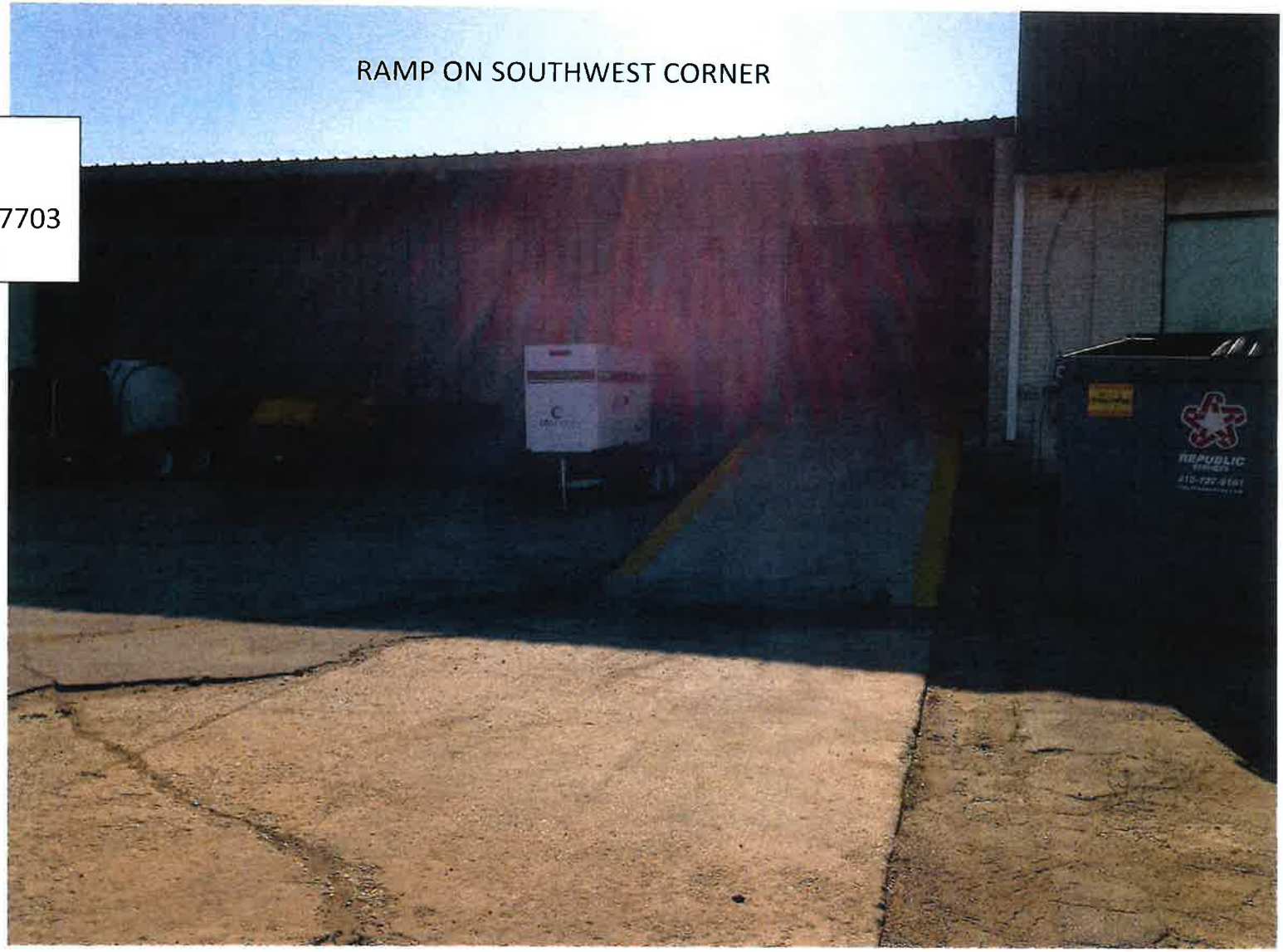


INTERIOR VIEW OF THE THIRD DOCK DOOR ON THE WEST SIDE, (OUTBOUND DOOR) LOCATED IN THE NORTHWEST CORNER OF THE BUILING

US ecology

EQ Northeast, Inc.
CHS Permit: X-XXX
EPA ID No.: MDR000527703
Figure 1F: Photographs

RAMP ON SOUTHWEST CORNER



ATTACHMENT 8

Permit Application Part A

EPA ID Number | M | D | R | 0 | 0 | 0 | 5 | 2 | 7 | 7 | 0 | 3 |

OMB# 2050-0024; Expires 05/31/2020

United States Environmental Protection Agency

HAZARDOUS WASTE PERMIT PART A FORM

1. Facility Permit Contact

First Name	**Paula**	MI		Last Name	**Cabral**
Title	**EHS Manager**				
Email	**paula.cabral@usecology.com**				
Phone	**(508) 803-1251**	Ext		Fax	

2. Facility Permit Contact Mailing Address

Street Address	**1321 Joh Avenue**		
City, Town, or Village	**Baltimore**		
State **MD**	Country **USA**	Zip Code	**21227**

3. Facility Existence Date (mm/dd/yyyy)

6/30/2019

4. Other Environmental Permits

A. Permit Type	B. Permit Number	C. Description
R	**MDR000527703**	**RCRA Notification**
N		**No Exposure Certification**

5. Nature of Business

EQ Northeast, Inc., a hazardous waste transporter intends to store manifested hazardous waste at the address indicated at Item 2 per 40 CFR 263.12(a).

6. Process Codes and Design Capacities

Line Number		A. Process Code			B. Process Design Capacity		C. Process Total Number of Units	D. Unit Name
					(1) Amount	(2) Unit of Measure		
0	1	S	0	1				

7. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

Line No.		A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes								
								(1) Process Codes								(2) Process Description (if code is not entered in 7.D1))
0	1	D	0	0	1			S	0	1						
0	2	D	0	0	2			S	0	1						
0	3	D	0	0	3			S	0	1						
0	4	D	0	0	4			S	0	1						
0	5	D	0	0	5			S	0	1						
0	6	D	0	0	6			S	0	1						
0	7	D	0	0	7			S	0	1						
0	8	D	0	0	8			S	0	1						
0	9	D	0	0	9			S	0	1						
1	0	D	0	1	0			S	0	1						
1	1	D	0	1	1			S	0	1						

8. Map

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

9. Facility Drawing

All existing facilities must include a scale drawing of the facility. See instructions for more detail.

10. Photographs

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

11. Comments

EPA ID Number: M D R 0 0 0 5 2 7 7 0 3

OMB# 2050-0024; Expires 5/31/2020

7. Description of Hazardous Wastes (Enter codes for items 7.A, 7.C, and 7.D(1))

Line No.	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes	
				(1) Process Codes	(2) Process Description (If code is not entered in 7.D1))
1 2	D 0 1 2			S 0 1	
1 3	D 0 1 3			S 0 1	
1 4	D 0 1 4			S 0 1	
1 5	D 0 1 5			S 0 1	
1 6	D 0 1 6			S 0 1	
1 7	D 0 1 7			S 0 1	
1 8	D 0 1 8			S 0 1	
1 9	D 0 1 9			S 0 1	
2 0	D 0 2 0			S 0 1	
2 1	D 0 2 1			S 0 1	
2 2	D 0 2 2			S 0 1	
2 3	D 0 2 3			S 0 1	
2 4	D 0 2 4			S 0 1	
2 5	D 0 2 5			S 0 1	
2 6	D 0 2 6			S 0 1	
2 7	D 0 2 7			S 0 1	
2 8	D 0 2 8			S 0 1	
2 9	D 0 2 9			S 0 1	
3 0	D 0 3 0			S 0 1	
3 1	D 0 3 1			S 0 1	
3 2	D 0 3 2			S 0 1	
3 3	D 0 3 3			S 0 1	
3 4	D 0 3 4			S 0 1	
3 5	D 0 3 5			S 0 1	
3 6	D 0 3 6			S 0 1	
3 7	D 0 3 7			S 0 1	
3 8	D 0 3 8			S 0 1	
3 9	D 0 3 9			S 0 1	
4 0	D 0 4 0			S 0 1	
4 1	D 0 4 1			S 0 1	
4 2	D 0 4 2			S 0 1	
4 3	D 0 4 3			S 0 1	
4 4	F 0 0 1			S 0 1	
4 5	F 0 0 2			S 0 1	
4 6	F 0 0 3			S 0 1	
4 7	F 0 0 4			S 0 1	
4 8	F 0 0 5			S 0 1	
4 9	F 0 0 6			S 0 1	
5 0	F 0 0 7			S 0 1	
5 1	F 0 0 8			S 0 1	
5 2	F 0 0 9			S 0 1	
5 3	F 0 1 0			S 0 1	
5 4	F 0 1 1			S 0 1	
5 5	F 0 1 2			S 0 1	
5 6	F 0 1 9			S 0 1	
5 7	F 0 2 0			S 0 1	
5 8	F 0 2 1			S 0 1	
5 9	F 0 2 2			S 0 1	
6 0	F 0 2 3			S 0 1	
6 1	F 0 2 4			S 0 1	
6 2	F 0 2 5			S 0 1	
6 3	F 0 2 6			S 0 1	
6 4	F 0 2 7			S 0 1	
6 5	F 0 2 8			S 0 1	
6 6	F 0 3 2			S 0 1	
6 7	F 0 3 4			S 0 1	
6 8	F 0 3 5			S 0 1	
6 9	F 0 3 7			S 0 1	
7 0	F 0 3 8			S 0 1	
7 1	F 0 3 9			S 0 1	

EPA ID Number: M D R 0 0 0 5 2 7 7 0 3

OMB# 2050-0024; Expires 5/31/2020

7. Description of Hazardous Wastes (Enter codes for items 7.A, 7.C, and 7.D(1))

Line No.	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes	
				(1) Process Codes	(2) Process Description (If code is not entered in 7.D1))
7 2	K 0 0 1			S 0 1	
7 3	K 0 0 2			S 0 1	
7 4	K 0 0 3			S 0 1	
7 5	K 0 0 4			S 0 1	
7 6	K 0 0 5			S 0 1	
7 7	K 0 0 6			S 0 1	
7 8	K 0 0 7			S 0 1	
7 9	K 0 0 8			S 0 1	
8 0	K 0 0 9			S 0 1	
8 1	K 0 1 0			S 0 1	
8 2	K 0 1 1			S 0 1	
8 3	K 0 1 3			S 0 1	
8 4	K 0 1 4			S 0 1	
8 5	K 0 1 5			S 0 1	
8 6	K 0 1 6			S 0 1	
8 7	K 0 1 7			S 0 1	
8 8	K 0 1 8			S 0 1	
8 9	K 0 1 9			S 0 1	
9 0	K 0 2 0			S 0 1	
9 1	K 0 2 1			S 0 1	
9 2	K 0 2 2			S 0 1	
9 3	K 0 2 3			S 0 1	
9 4	K 0 2 4			S 0 1	
9 5	K 0 2 5			S 0 1	
9 6	K 0 2 6			S 0 1	
9 7	K 0 2 7			S 0 1	
9 8	K 0 2 8			S 0 1	
9 9	K 0 2 9			S 0 1	
10 0	K 0 3 0			S 0 1	
10 1	K 0 3 1			S 0 1	
10 2	K 0 3 2			S 0 1	
10 3	K 0 3 3			S 0 1	
10 4	K 0 3 4			S 0 1	
10 5	K 0 3 5			S 0 1	
10 6	K 0 3 6			S 0 1	
10 7	K 0 3 7			S 0 1	
10 8	K 0 3 8			S 0 1	
10 9	K 0 3 9			S 0 1	
11 0	K 0 4 0			S 0 1	
11 1	K 0 4 1			S 0 1	
11 2	K 0 4 2			S 0 1	
11 3	K 0 4 3			S 0 1	
11 4	K 0 4 4			S 0 1	
11 5	K 0 4 5			S 0 1	
11 6	K 0 4 6			S 0 1	
11 7	K 0 4 7			S 0 1	
11 8	K 0 4 8			S 0 1	
11 9	K 0 4 9			S 0 1	
12 0	K 0 5 0			S 0 1	
12 1	K 0 5 1			S 0 1	
12 2	K 0 5 2			S 0 1	
12 3	K 0 6 0			S 0 1	
12 4	K 0 6 1			S 0 1	
12 5	K 0 6 2			S 0 1	
12 6	K 0 6 9			S 0 1	
12 7	K 0 7 1			S 0 1	
12 8	K 0 7 3			S 0 1	
12 9	K 0 8 3			S 0 1	
13 0	K 0 8 4			S 0 1	
13 1	K 0 8 5			S 0 1	

7. Description of Hazardous Wastes (Enter codes for items 7.A, 7.C, and 7.D(1))

Line No.	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes	
				(1) Process Codes	(2) Process Description (If code is not entered in 7.D1))
13 2	K086			S01	
13 3	K087			S01	
13 4	K088			S01	
13 5	K093			S01	
13 6	K094			S01	
13 7	K095			S01	
13 8	K096			S01	
13 9	K097			S01	
14 0	K098			S01	
14 1	K099			S01	
14 2	K100			S01	
14 3	K101			S01	
14 4	K102			S01	
14 5	K103			S01	
14 6	K104			S01	
14 7	K105			S01	
14 8	K106			S01	
14 9	K107			S01	
15 0	K108			S01	
15 1	K109			S01	
15 2	K110			S01	
15 3	K111			S01	
15 4	K112			S01	
15 5	K113			S01	
15 6	K114			S01	
15 7	K115			S01	
15 8	K116			S01	
15 9	K117			S01	
16 0	K118			S01	
16 1	K123			S01	
16 2	K124			S01	
16 3	K125			S01	
16 4	K126			S01	
16 5	K131			S01	
16 6	K132			S01	
16 7	K136			S01	
16 8	K141			S01	
16 9	K142			S01	
17 0	K143			S01	
17 1	K144			S01	
17 2	K145			S01	
17 3	K147			S01	
17 4	K148			S01	
17 5	K149			S01	
17 6	K150			S01	
17 7	K151			S01	
17 8	K156			S01	
17 9	K157			S01	
18 0	K158			S01	
18 1	K159			S01	
18 2	K161			S01	
18 3	K169			S01	
18 4	K170			S01	
18 5	K171			S01	
18 6	K172			S01	
18 7	K174			S01	
18 8	K175			S01	
18 9	K176			S01	
19 0	K177			S01	
19 1	K178			S01	

7. Description of Hazardous Wastes (Enter codes for items 7.A, 7.C, and 7.D(1))

Line No.	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes	
				(1) Process Codes	(2) Process Description (If code is not entered in 7.D1))
19 2	K 1 8 1			S 0 1	
19 3	P 0 0 1			S 0 1	
19 4	P 0 0 2			S 0 1	
19 5	P 0 0 3			S 0 1	
19 6	P 0 0 4			S 0 1	
19 7	P 0 0 5			S 0 1	
19 8	P 0 0 6			S 0 1	
19 9	P 0 0 7			S 0 1	
20 0	P 0 0 8			S 0 1	
20 1	P 0 0 9			S 0 1	
20 2	P 0 1 0			S 0 1	
20 3	P 0 1 1			S 0 1	
20 4	P 0 1 2			S 0 1	
20 5	P 0 1 3			S 0 1	
20 6	P 0 1 4			S 0 1	
20 7	P 0 1 5			S 0 1	
20 8	P 0 1 6			S 0 1	
20 9	P 0 1 7			S 0 1	
21 0	P 0 1 8			S 0 1	
21 1	P 0 2 0			S 0 1	
21 2	P 0 2 1			S 0 1	
21 3	P 0 2 2			S 0 1	
21 4	P 0 2 3			S 0 1	
21 5	P 0 2 4			S 0 1	
21 6	P 0 2 6			S 0 1	
21 7	P 0 2 7			S 0 1	
21 8	P 0 2 8			S 0 1	
21 9	P 0 2 9			S 0 1	
22 0	P 0 3 0			S 0 1	
22 1	P 0 3 1			S 0 1	
22 2	P 0 3 3			S 0 1	
22 3	P 0 3 4			S 0 1	
22 4	P 0 3 6			S 0 1	
22 5	P 0 3 7			S 0 1	
22 6	P 0 3 8			S 0 1	
22 7	P 0 3 9			S 0 1	
22 8	P 0 4 0			S 0 1	
22 9	P 0 4 1			S 0 1	
23 0	P 0 4 2			S 0 1	
23 1	P 0 4 3			S 0 1	
23 2	P 0 4 4			S 0 1	
23 3	P 0 4 5			S 0 1	
23 4	P 0 4 6			S 0 1	
23 5	P 0 4 7			S 0 1	
23 6	P 0 4 8			S 0 1	
23 7	P 0 4 9			S 0 1	
23 8	P 0 5 0			S 0 1	
23 9	P 0 5 1			S 0 1	
24 0	P 0 5 4			S 0 1	
24 1	P 0 5 6			S 0 1	
24 2	P 0 5 7			S 0 1	
24 3	P 0 5 8			S 0 1	
24 4	P 0 5 9			S 0 1	
24 5	P 0 6 0			S 0 1	
24 6	P 0 6 2			S 0 1	
24 7	P 0 6 3			S 0 1	
24 8	P 0 6 4			S 0 1	
24 9	P 0 6 5			S 0 1	
25 0	P 0 6 6			S 0 1	
25 1	P 0 6 7			S 0 1	

7. Description of Hazardous Wastes (Enter codes for items 7.A, 7.C, and 7.D(1))

Line No.	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes	
				(1) Process Codes	(2) Process Description (If code is not entered in 7.D1))
25 2	P 0 6 8			S 0 1	
25 3	P 0 6 9			S 0 1	
25 4	P 0 7 0			S 0 1	
25 5	P 0 7 1			S 0 1	
25 6	P 0 7 2			S 0 1	
25 7	P 0 7 3			S 0 1	
25 8	P 0 7 4			S 0 1	
25 9	P 0 7 5			S 0 1	
26 0	P 0 7 6			S 0 1	
26 1	P 0 7 7			S 0 1	
26 2	P 0 7 8			S 0 1	
26 3	P 0 8 1			S 0 1	
26 4	P 0 8 2			S 0 1	
26 5	P 0 8 4			S 0 1	
26 6	P 0 8 5			S 0 1	
26 7	P 0 8 7			S 0 1	
26 8	P 0 8 8			S 0 1	
26 9	P 0 8 9			S 0 1	
27 0	P 0 9 2			S 0 1	
27 1	P 0 9 3			S 0 1	
27 2	P 0 9 4			S 0 1	
27 3	P 0 9 5			S 0 1	
27 4	P 0 9 6			S 0 1	
27 5	P 0 9 7			S 0 1	
27 6	P 0 9 8			S 0 1	
27 7	P 0 9 9			S 0 1	
27 8	P 1 0 1			S 0 1	
27 9	P 1 0 2			S 0 1	
28 0	P 1 0 3			S 0 1	
28 1	P 1 0 4			S 0 1	
28 2	P 1 0 5			S 0 1	
28 3	P 1 0 6			S 0 1	
28 4	P 1 0 8			S 0 1	
28 5	P 1 0 9			S 0 1	
28 6	P 1 1 0			S 0 1	
28 7	P 1 1 1			S 0 1	
28 8	P 1 1 2			S 0 1	
28 9	P 1 1 3			S 0 1	
29 0	P 1 1 4			S 0 1	
29 1	P 1 1 5			S 0 1	
29 2	P 1 1 6			S 0 1	
29 3	P 1 1 8			S 0 1	
29 4	P 1 1 9			S 0 1	
29 5	P 1 2 0			S 0 1	
29 6	P 1 2 1			S 0 1	
29 7	P 1 2 2			S 0 1	
29 8	P 1 2 3			S 0 1	
29 9	P 1 2 7			S 0 1	
30 0	P 1 2 8			S 0 1	
30 1	P 1 8 5			S 0 1	
30 2	P 1 8 8			S 0 1	
30 3	P 1 8 9			S 0 1	
30 4	P 1 9 0			S 0 1	
30 5	P 1 9 1			S 0 1	
30 6	P 1 9 2			S 0 1	
30 7	P 1 9 4			S 0 1	
30 8	P 1 9 6			S 0 1	
30 9	P 1 9 7			S 0 1	
31 0	P 1 9 8			S 0 1	
31 1	P 1 9 9			S 0 1	

7. Description of Hazardous Wastes (Enter codes for items 7.A, 7.C, and 7.D(1))

Line No.	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes	
				(1) Process Codes	(2) Process Description (If code is not entered in 7.D1))
31 2	P 2 0 1			S 0 1	
31 3	P 2 0 2			S 0 1	
31 4	P 2 0 3			S 0 1	
31 5	P 2 0 4			S 0 1	
31 6	P 2 0 5			S 0 1	
31 7	U 0 0 1			S 0 1	
31 8	U 0 0 2			S 0 1	
31 9	U 0 0 3			S 0 1	
32 0	U 0 0 4			S 0 1	
32 1	U 0 0 5			S 0 1	
32 2	U 0 0 6			S 0 1	
32 3	U 0 0 7			S 0 1	
32 4	U 0 0 8			S 0 1	
32 5	U 0 0 9			S 0 1	
32 6	U 0 1 0			S 0 1	
32 7	U 0 1 1			S 0 1	
32 8	U 0 1 2			S 0 1	
32 9	U 0 1 4			S 0 1	
33 0	U 0 1 5			S 0 1	
33 1	U 0 1 6			S 0 1	
33 2	U 0 1 7			S 0 1	
33 3	U 0 1 8			S 0 1	
33 4	U 0 1 9			S 0 1	
33 5	U 0 2 0			S 0 1	
33 6	U 0 2 1			S 0 1	
33 7	U 0 2 2			S 0 1	
33 8	U 0 2 3			S 0 1	
33 9	U 0 2 4			S 0 1	
34 0	U 0 2 5			S 0 1	
34 1	U 0 2 6			S 0 1	
34 2	U 0 2 7			S 0 1	
34 3	U 0 2 8			S 0 1	
34 4	U 0 2 9			S 0 1	
34 5	U 0 3 0			S 0 1	
34 6	U 0 3 1			S 0 1	
34 7	U 0 3 2			S 0 1	
34 8	U 0 3 3			S 0 1	
34 9	U 0 3 4			S 0 1	
35 0	U 0 3 5			S 0 1	
35 1	U 0 3 6			S 0 1	
35 2	U 0 3 7			S 0 1	
35 3	U 0 3 8			S 0 1	
35 4	U 0 3 9			S 0 1	
35 5	U 0 4 1			S 0 1	
35 6	U 0 4 2			S 0 1	
35 7	U 0 4 3			S 0 1	
35 8	U 0 4 4			S 0 1	
35 9	U 0 4 5			S 0 1	
36 0	U 0 4 6			S 0 1	
36 1	U 0 4 7			S 0 1	
36 2	U 0 4 8			S 0 1	
36 3	U 0 4 9			S 0 1	
36 4	U 0 5 0			S 0 1	
36 5	U 0 5 1			S 0 1	
36 6	U 0 5 2			S 0 1	
36 7	U 0 5 3			S 0 1	
36 8	U 0 5 5			S 0 1	
36 9	U 0 5 6			S 0 1	
37 0	U 0 5 7			S 0 1	
37 1	U 0 5 8			S 0 1	

7. Description of Hazardous Wastes (Enter codes for items 7.A, 7.C, and 7.D(1))

Line No.	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes	
				(1) Process Codes	(2) Process Description (If code is not entered in 7.D1))
37 2	U059			S01	
37 3	U060			S01	
37 4	U061			S01	
37 5	U062			S01	
37 6	U063			S01	
37 7	U064			S01	
37 8	U065			S01	
37 9	U066			S01	
38 0	U067			S01	
38 1	U068			S01	
38 2	U069			S01	
38 3	U070			S01	
38 4	U071			S01	
38 5	U072			S01	
38 6	U073			S01	
38 7	U074			S01	
38 8	U075			S01	
38 9	U076			S01	
39 0	U077			S01	
39 1	U078			S01	
39 2	U079			S01	
39 3	U080			S01	
39 4	U081			S01	
39 5	U082			S01	
39 6	U083			S01	
39 7	U084			S01	
39 8	U085			S01	
39 9	U086			S01	
40 0	U087			S01	
40 1	U088			S01	
40 2	U089			S01	
40 3	U090			S01	
40 4	U091			S01	
40 5	U092			S01	
40 6	U093			S01	
40 7	U094			S01	
40 8	U095			S01	
40 9	U096			S01	
41 0	U097			S01	
41 1	U098			S01	
41 2	U099			S01	
41 3	U101			S01	
41 4	U102			S01	
41 5	U103			S01	
41 6	U105			S01	
41 7	U106			S01	
41 8	U107			S01	
41 9	U108			S01	
42 0	U109			S01	
42 1	U110			S01	
42 2	U111			S01	
42 3	U112			S01	
42 4	U113			S01	
42 5	U114			S01	
42 6	U115			S01	
42 7	U116			S01	
42 8	U117			S01	
42 9	U118			S01	
43 0	U119			S01	
43 1	U120			S01	

EPA ID Number: M D R 0 0 0 5 2 7 7 0 3

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7. Description of Hazardous Wastes (Enter codes for items 7.A, 7.C, and 7.D(1))

Line No.	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes	
				(1) Process Codes	(2) Process Description (If code is not entered in 7.D1))
43 2	U 1 2 1			S 0 1	
43 3	U 1 2 2			S 0 1	
43 4	U 1 2 3			S 0 1	
43 5	U 1 2 4			S 0 1	
43 6	U 1 2 5			S 0 1	
43 7	U 1 2 6			S 0 1	
43 8	U 1 2 7			S 0 1	
43 9	U 1 2 8			S 0 1	
44 0	U 1 2 9			S 0 1	
44 1	U 1 3 0			S 0 1	
44 2	U 1 3 1			S 0 1	
44 3	U 1 3 2			S 0 1	
44 4	U 1 3 3			S 0 1	
44 5	U 1 3 4			S 0 1	
44 6	U 1 3 5			S 0 1	
44 7	U 1 3 6			S 0 1	
44 8	U 1 3 7			S 0 1	
44 9	U 1 3 8			S 0 1	
45 0	U 1 4 0			S 0 1	
45 1	U 1 4 1			S 0 1	
45 2	U 1 4 2			S 0 1	
45 3	U 1 4 3			S 0 1	
45 4	U 1 4 4			S 0 1	
45 5	U 1 4 5			S 0 1	
45 6	U 1 4 6			S 0 1	
45 7	U 1 4 7			S 0 1	
45 8	U 1 4 8			S 0 1	
45 9	U 1 4 9			S 0 1	
46 0	U 1 5 0			S 0 1	
46 1	U 1 5 1			S 0 1	
46 2	U 1 5 2			S 0 1	
46 3	U 1 5 3			S 0 1	
46 4	U 1 5 4			S 0 1	
46 5	U 1 5 5			S 0 1	
46 6	U 1 5 6			S 0 1	
46 7	U 1 5 7			S 0 1	
46 8	U 1 5 8			S 0 1	
46 9	U 1 5 9			S 0 1	
47 0	U 1 6 0			S 0 1	
47 1	U 1 6 1			S 0 1	
47 2	U 1 6 2			S 0 1	
47 3	U 1 6 3			S 0 1	
47 4	U 1 6 4			S 0 1	
47 5	U 1 6 5			S 0 1	
47 6	U 1 6 6			S 0 1	
47 7	U 1 6 7			S 0 1	
47 8	U 1 6 8			S 0 1	
47 9	U 1 6 9			S 0 1	
48 0	U 1 7 0			S 0 1	
48 1	U 1 7 1			S 0 1	
48 2	U 1 7 2			S 0 1	
48 3	U 1 7 3			S 0 1	
48 4	U 1 7 4			S 0 1	
48 5	U 1 7 6			S 0 1	
48 6	U 1 7 7			S 0 1	
48 7	U 1 7 8			S 0 1	
48 8	U 1 7 9			S 0 1	
48 9	U 1 8 0			S 0 1	
49 0	U 1 8 1			S 0 1	
49 1	U 1 8 2			S 0 1	

7. Description of Hazardous Wastes (Enter codes for items 7.A, 7.C, and 7.D(1))

Line No.	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes	
				(1) Process Codes	(2) Process Description (If code is not entered in 7.D1))
49 2	U 1 8 3			S 0 1	
49 3	U 1 8 4			S 0 1	
49 4	U 1 8 5			S 0 1	
49 5	U 1 8 6			S 0 1	
49 6	U 1 8 7			S 0 1	
49 7	U 1 8 8			S 0 1	
49 8	U 1 8 9			S 0 1	
49 9	U 1 9 0			S 0 1	
50 0	U 1 9 1			S 0 1	
50 1	U 1 9 2			S 0 1	
50 2	U 1 9 3			S 0 1	
50 3	U 1 9 4			S 0 1	
50 4	U 1 9 6			S 0 1	
50 5	U 1 9 7			S 0 1	
50 6	U 2 0 0			S 0 1	
50 7	U 2 0 1			S 0 1	
50 8	U 2 0 3			S 0 1	
50 9	U 2 0 4			S 0 1	
51 0	U 2 0 5			S 0 1	
51 1	U 2 0 6			S 0 1	
51 2	U 2 0 7			S 0 1	
51 3	U 2 0 8			S 0 1	
51 4	U 2 0 9			S 0 1	
51 5	U 2 1 0			S 0 1	
51 6	U 2 1 1			S 0 1	
51 7	U 2 1 3			S 0 1	
51 8	U 2 1 4			S 0 1	
51 9	U 2 1 5			S 0 1	
52 0	U 2 1 6			S 0 1	
52 1	U 2 1 7			S 0 1	
52 2	U 2 1 8			S 0 1	
52 3	U 2 1 9			S 0 1	
52 4	U 2 2 0			S 0 1	
52 5	U 2 2 1			S 0 1	
52 6	U 2 2 2			S 0 1	
52 7	U 2 2 3			S 0 1	
52 8	U 2 2 5			S 0 1	
52 9	U 2 2 6			S 0 1	
53 0	U 2 2 7			S 0 1	
53 1	U 2 2 8			S 0 1	
53 2	U 2 3 4			S 0 1	
53 3	U 2 3 5			S 0 1	
53 4	U 2 3 6			S 0 1	
53 5	U 2 3 7			S 0 1	
53 6	U 2 3 8			S 0 1	
53 7	U 2 3 9			S 0 1	
53 8	U 2 4 0			S 0 1	
53 9	U 2 4 3			S 0 1	
54 0	U 2 4 4			S 0 1	
54 1	U 2 4 6			S 0 1	
54 2	U 2 4 7			S 0 1	
54 3	U 2 4 8			S 0 1	
54 4	U 2 4 9			S 0 1	
54 5	U 2 7 1			S 0 1	
54 6	U 2 7 8			S 0 1	
54 7	U 2 7 9			S 0 1	
54 8	U 2 8 0			S 0 1	
54 9	U 3 2 8			S 0 1	
55 0	U 3 5 3			S 0 1	
55 1	U 3 5 9			S 0 1	

7. Description of Hazardous Wastes (Enter codes for items 7.A, 7.C, and 7.D(1))

Line No.	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes	
				(1) Process Codes	(2) Process Description (If code is not entered in 7.D1))
55 2	U 3 6 4			S 0 1	
55 3	U 3 6 7			S 0 1	
55 4	U 3 7 2			S 0 1	
55 5	U 3 7 3			S 0 1	
55 6	U 3 8 7			S 0 1	
55 7	U 3 8 9			S 0 1	
55 8	U 3 9 4			S 0 1	
55 9	U 3 9 5			S 0 1	
56 0	U 4 0 4			S 0 1	
56 1	U 4 0 9			S 0 1	
56 2	U 4 1 0			S 0 1	
56 3	U 4 1 1			S 0 1	