June 28, 2023

Ed Hammerberg
Technical Specialist/RCE Supervisor
Land and Materials Administration/SWP
Maryland Department of the Environment (MDE)
1800 Washington Boulevard
Baltimore, Maryland 21230
ed.hammerberg@maryland.gov
Office: (410) 537-3356

RE: 10-Day Transfer Facility Permit Application
1500 Carbon Ave, Baltimore, MD 21226
EPA ID#: MDD093002384

Dear Mr. Hammerberg,

Triumvirate Environmental (Baltimore), LLC has provided a permit application for a 10-Day in-transit waste transfer area located at 1500 Carbon Avenue, Baltimore, Maryland 21226. A pre-application public meeting occurred on January 30, 2023 at the La Quinta Inn and Suites located at 6323 Ritchie Hwy, Glen Burnie, MD 21061.

All sections of the permit renewal application are marked with a revision number and revision date; the revision number of the initial submittal is "0". The permit renewal application included with this cover letter includes attachments, figures, and exhibits as outlined below.

If you have any questions or require additional information regarding this permit application, please do not hesitate to contact me at the information shown in the signature block below.

Sincerely,

Justin Hartshorn

Justin Hartshorn
Corporate Environmental Compliance | Triumvirate Environmental, Inc.
200 Inner Belt Road, Somerville, MA 02143
Office: 617-715-8902 | Mobile: 304-373-4989
jhartshorn@triumvirate.com | www.triumvirate.com

CC: Albert Simkins, MDE
Jake Giovanucci, Triumvirate General Manager Mid-Atlantic North
Tim Mooney, Triumvirate Chief Operating Officer

Permit Application Contents

Certification Statement

Signed by the President of Triumvirate.

Part A

1. US EPA Hazardous Waste Permit Part A Form (OMB# 2050-0024; Expires 04/30/2024)
    - Exhibit A-1: Waste Codes
2. US EPA Site Identification Form 8700-12

Part B

1. Facility Description
2. Process Description
3. Waste Analysis Plan
4. Procedures to Prevent Hazards
5. Inspection Schedule
6. Waiver or Documentation of Preparedness and Prevention Requirements
7. Equipment Requirements
8. Preventive Procedures, Structures and Equipment
9. Prevention of Reaction of Ignitable, Reactive and Incompatible Wastes
10. Personnel Training
11. Contingency Plan – General
12. Contingency Plan – Fire or Explosion Response Procedures
13. Contingency Plan – Spill or Release Response Procedures
14. Contingency Plan – Emergency Coordinator Specific Responsibilities
15. Contingency Plan – Emergency Response Systems and Equipment
16. Contingency Plan – Mutual Aid Response Organizations
17. Contingency Plan – Evacuation Plan
18. Closure Plan and Financial Requirements
19. Closure Procedures
20. Closure Cost Estimate

Supporting Attachments

Figure 1: Topographic Map

- Figure 1a: Topographic Map with 1-Mile Radius (2,000 ft scale)
- Figure 1b: Topographic Map with 1-Mile Radius (1,000 ft scale)
- Figure 1c: Google Terrain Map

Figure 2: Property Boundary and Land Use Map

- Figure 2a: Property Boundary Map
- Figure 2b: Land Use Map

Figure 3: Flood Zone Map

Figure 4: Site Plans

- Figure 4a: Current Site Plan with ER Equipment
- Figure 4b: Site Plan with Proposed 10-Day Transfer Area
- Figure 4c: Site Plan with Traffic Flow
- Figure 4d: Emergency Response Equipment Locations
- Figure 4e: Secondary Containment Details
- Figure 4f: Evacuation Routes and Rally Points

Figure 5: DOT Segregation Table

Figure 6: Wind Rose

Exhibit 1: List of Corporate Officers

Exhibit 2: Site Photographs

Exhibit 3: Pre-Application Public Meeting Records

Exhibit 4: Waste Profile Example

Exhibit 5: Daily Inspection Log

Exhibit 6: Weekly Inspection Log

Exhibit 7: Job Descriptions

Exhibit 8: DOT Special Permits

Exhibit 9: Closure Cost Estimate

Delivery via UPS #1Z 75R 82R NT 9568 4220 (2 paper copies + 1 flash drive)
Delivery via email dated March 21, 2024

March 21, 2024

Ed Hammerberg
Technical Specialist/RCE Supervisor
Land and Materials Administration/SWP
Maryland Department of the Environment (MDE)
1800 Washington Boulevard, Baltimore, Maryland 21230
ed.hammerberg@maryland.gov
Office: (410) 537-3356

RE: Controlled Hazardous Substance (CHS) Transfer Facility Permit Application
Response to MDE Initial Review Letter Dated February 9, 2024
1500 Carbon Ave, Baltimore, MD 21226
EPA ID#: MDD093002384

Dear Mr. Hammerberg,

Triumvirate Environmental (Baltimore), LLC (Triumvirate) has updated the Controlled Hazardous Substance (CHS) Transfer Facility Permit Application for 1500 Carbon Avenue, Baltimore, Maryland 21226, based on comments received from MDE on February 9, 2024. Each section of the permit application is marked with a revision number and a revision date. The initial application submitted on June 9, 2023 is denoted as "Rev 0". The revised application items submitted on March 21, 2024 are denoted as "Rev 1". Per discussions with MDE, only the revised sections are being submitted in this response. The sections that have been updated are listed in Exhibit A of this letter. The comments provided by MDE in the February 9, 2024, letter are provided in Exhibit B with Triumvirate's response to each section.

If you have any questions or require additional information, please do not hesitate to contact me by phone or email.

Sincerely,

Justin Hartshorn

Justin Hartshorn
Corporate Environmental Compliance | Triumvirate Environmental, Inc.
200 Inner Belt Road, Somerville, MA 02143
Office: 617-715-8902 | Mobile: 304-373-4989
jhartshorn@triumvirate.com | www.triumvirate.com

CC: Albert Simkins, MDE
Jake Giovanucci, Triumvirate General Manager Mid-Atlantic North
David LaBelle, VP EHS
Tim Mooney, Triumvirate Chief Operating Officer

Enclosure: Exhibit A – Updated Sections of the Permit Application
Exhibit B – Response to MDE Comments from February 9, 2024

Exhibit A: Updated Sections of the Permit Application

- Certification Statement – Recertified by a Responsible Official of Triumvirate
- Exhibit A-1: Part A, Section 7 Waste Descriptions (Rev 1)
- Part B – Operational Details (Rev 1)
- Figure 4: Site Plans (Rev 1)
- Exhibit 5: Daily Inspection Log (Rev 1)
- Exhibit 9: Closure Cost Estimate (Rev 1)
- Exhibit 10: Contingency Plan (Rev 1)

10-Day Hazardous Waste Transfer Permit Application

Certification Statement

Triumvirate Environmental (Baltimore), LLC
1500 Carbon Avenue
Baltimore, MD 21226

EPA ID No. MDD093002384

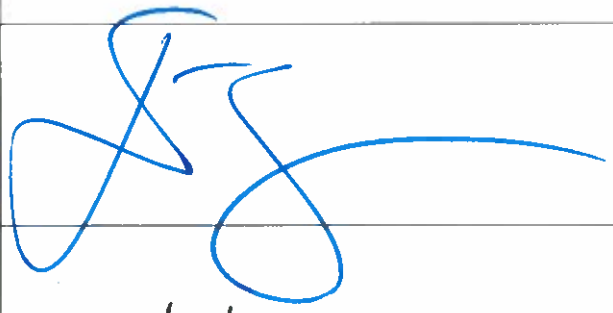
Application Date: June 9, 2023

Purpose of Certification: 10-Day Hazardous Waste Transfer Facility Permit Application for Triumvirate Environmental (Baltimore), LLC located at 1500 Carbon Avenue, Baltimore, Maryland 21226; EPA ID No. MDD093002384

Certification Statement:

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

Signatory to Permit Application:

Name and Title	**Doug Youngen, President**
Signature	
Date	6/8/2023

Applicable Regulations

Title 26, Subtitle 13, Chapter 7, Regulation 3 - Signatories to Permit Applications and Reports.

.03 Signatories to Permit Applications and Reports.

A. Applications.

All permit applications shall be signed as follows:

(1) For a corporation, by a responsible corporate officer. For the purpose of this section, a responsible corporate officer means:

(a) A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation; or

(b) The manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding $25 million (in second-quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

B. Reports.

All reports required by permits and other information requested by the Secretary, shall be signed by a person described in §A of this regulation, or by a duly authorized representative of that person. A person is a duly authorized representative only if:

(1) The authorization is made in writing by a person described in §A of this regulation.

(2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or a well field, superintendent, or position of equivalent responsibility. (A duly authorized representative may thus be either a named individual or any individual occupying a named position).

(3) The written authorization is submitted to the Secretary.

C. Changes to Authorization.

If an authorization under §B of this regulation is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of §B of this regulation shall be submitted to the Secretary before or together with any reports, information, or applications to be signed by an authorized representative.

D. Certification.

Any person signing a document under §A or B of this regulation shall make the following certification:

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

TRIUMVIRATE
ENVIRONMENTAL

10-Day Hazardous Waste Transfer Permit Application

Certification Statement

Triumvirate Environmental (Baltimore), LLC
1500 Carbon Avenue
Baltimore, MD 21226

EPA ID No. MDD093002384

Application Date: June 9, 2023
Revision #1: March 21, 2024

Purpose of Certification: 10-Day Hazardous Waste Transfer Facility Permit Application for Triumvirate Environmental (Baltimore), LLC located at 1500 Carbon Avenue, Baltimore, Maryland 21226; EPA ID No. MDD093002384

Certification Statement:

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

Signatory to Permit Application:

Name and Title	**Tim Mooney, COO**
Signature	
Date	3/20/24

Applicable Regulations

Title 26, Subtitle 13, Chapter 7, Regulation 3 - Signatories to Permit Applications and Reports.

.03 Signatories to Permit Applications and Reports.

A. Applications.

All permit applications shall be signed as follows:

(1) For a corporation, by a responsible corporate officer. For the purpose of this section, a responsible corporate officer means:

(a) A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation; or

(b) The manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding $25 million (in second-quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

B. Reports.

All reports required by permits and other information requested by the Secretary, shall be signed by a person described in §A of this regulation, or by a duly authorized representative of that person. A person is a duly authorized representative only if:

(1) The authorization is made in writing by a person described in §A of this regulation.

(2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or a well field, superintendent, or position of equivalent responsibility. (A duly authorized representative may thus be either a named individual or any individual occupying a named position).

(3) The written authorization is submitted to the Secretary.

C. Changes to Authorization.

If an authorization under §B of this regulation is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of §B of this regulation shall be submitted to the Secretary before or together with any reports, information, or applications to be signed by an authorized representative.

D. Certification.

Any person signing a document under §A or B of this regulation shall make the following certification:

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

Part A

Hazardous Waste Permit
Part A Form

United States Environmental Protection Agency

HAZARDOUS WASTE PERMIT PART A FORM

1. Facility Permit Contact

First Name	**John**	MI		Last Name	**Giovanucci**
Title	**General Manager**				
Email	**jgiovanucci@triumvirate.com**				
Phone	**410-636-3700**	Ext		Fax	

2. Facility Permit Contact Mailing Address

Street Address	**1500 Carbon Avenue**		
City, Town, or Village	**Baltimore**		
State **Maryland**	Country **USA**	Zip Code **21226**	

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

9/1/2023

4. Other Environmental Permits

A. Permit Type	B. Permit Number	C. Description
N	**18OGT-27222**	**Stormwater dischrage for oil terminal**
E	**1-0991900**	**Industrial discharge to POTW**
E	**2021-OPT-2722**	**Oil Operations Permit**

5. Nature of Business

The company provides transportation and waste management services to generators located in the Mid-Atlantic and Baltimore metropolitan area, including schools, laboratories, medical facilities, and industrial companies.The facility is requesting a permit to perform 10-day in-transit truck to truck transfer of hazardous and non-hazardous waste. Triumvirate will transport containerized and lab pack wastes from off-site generators to the transfer area and consolidate loads prior to subsequent shipment to authorized recycling, treatment, and disposal facilities in accordance with applicable federal and state hazardous waste management rules and regulations.

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	44,000	G	N/A*	10-Day Transfer Area
								*In transit transfer only

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))
*	*	*	*	*	*	*	*	*	*	*						*See Exhibit A-1 for
																list of waste codes.

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

Section 7 "Description of Hazardous Waste" is continued in Exhibit A-1 of the permit application.

Section Divide

Exhibit A-1:
Part A, Section 7 “Description of Hazardous Waste”

Exhibit A-1: Part A Form, Section 7

Section 7 "Description of Hazardous Wastes" from Part A Form (OMB# 2050-0024; Expires 04/30/2024)

Line Number	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D(1). Process Codes
1	D001	800,000	P	S01
2	D002	200,000	P	S01
3	D003	2,000	P	S01
4	D004	3,000	P	S01
5	D005	3,000	P	S01
6	D006	3,000	P	S01
7	D007	60,000	P	S01
8	D008	15,000	P	S01
9	D009	60,000	P	S01
10	D010	1,000	P	S01
11	D011	7,500	P	S01
12	D012	150	P	S01
13	D013	150	P	S01
14	D014	150	P	S01
15	D015	150	P	S01
16	D016	150	P	S01
17	D017	150	P	S01
18	D018	5,000	P	S01
19	D019	5,000	P	S01
20	D020	150	P	S01
21	D021	150	P	S01
22	D022	3,500	P	S01
23	D023	150	P	S01
24	D024	150	P	S01
25	D025	150	P	S01
26	D026	150	P	S01
27	D027	150	P	S01
28	D028	1,000	P	S01
29	D029	5,000	P	S01
30	D030	20	P	S01
31	D031	20	P	S01
32	D032	20	P	S01
33	D033	20	P	S01

Line Number	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D(1). Process Codes
34	D034	20	P	S01
35	D035	5,000	P	S01
36	D036	20	P	S01
37	D037	20	P	S01
38	D038	1,000	P	S01
39	D039	2,500	P	S01
40	D040	5,000	P	S01
41	D041	20	P	S01
42	D042	20	P	S01
43	D043	20	P	S01
44	F001	100,000	P	S01
45	F002	100,000	P	S01
46	F003	200,000	P	S01
47	F004	1,000	P	S01
48	F005	15,000	P	S01
49	F006	5,000	P	S01
50	F007	3,000	P	S01
51	F008	1,000	P	S01
52	F009	1,000	P	S01
53	F010	1,000	P	S01
54	F011	1,000	P	S01
55	F012	1,000	P	S01
56	F027	20	P	S01
57	F028	100	P	S01
58	F032	100	P	S01
59	F034	100	P	S01
60	F035	100	P	S01
61	F037	100	P	S01
62	F038	100	P	S01
63	F039	100	P	S01
64	K001	100	P	S01
65	K002	100	P	S01
66	K003	100	P	S01
67	K004	100	P	S01
68	K005	100	P	S01
69	K006	100	P	S01
70	K007	100	P	S01

Line Number	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D(1). Process Codes
71	K008	100	P	S01
72	K009	100	P	S01
73	K010	100	P	S01
74	K011	100	P	S01
75	K012	100	P	S01
76	K013	100	P	S01
77	K014	100	P	S01
78	K015	100	P	S01
79	K016	100	P	S01
80	K017	100	P	S01
81	K018	100	P	S01
82	K019	100	P	S01
83	K020	100	P	S01
84	K021	100	P	S01
85	K022	100	P	S01
86	K023	100	P	S01
87	K024	100	P	S01
88	K025	100	P	S01
89	K026	100	P	S01
90	K027	100	P	S01
91	K028	100	P	S01
92	K029	100	P	S01
93	K030	100	P	S01
94	K031	100	P	S01
95	K032	100	P	S01
96	K033	100	P	S01
97	K034	100	P	S01
98	K035	100	P	S01
99	K036	100	P	S01
100	K037	100	P	S01
101	K038	100	P	S01
102	K039	100	P	S01
103	K040	100	P	S01
104	K041	100	P	S01
105	K042	100	P	S01
106	K043	100	P	S01
107	K044	100	P	S01

Line Number	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D(1). Process Codes
108	K045	100	P	S01
109	K046	100	P	S01
110	K047	100	P	S01
111	K048	100	P	S01
112	K049	100	P	S01
113	K050	100	P	S01
114	K051	100	P	S01
115	K052	100	P	S01
116	K060	100	P	S01
117	K061	100	P	S01
118	K062	100	P	S01
119	K069	100	P	S01
120	K071	100	P	S01
121	K073	100	P	S01
122	K083	100	P	S01
123	K084	100	P	S01
124	K085	100	P	S01
125	K086	100	P	S01
126	K087	100	P	S01
127	K088	100	P	S01
128	K093	100	P	S01
129	K094	100	P	S01
130	K095	100	P	S01
131	K096	100	P	S01
132	K097	100	P	S01
133	K098	100	P	S01
134	K099	100	P	S01
135	K100	100	P	S01
136	K101	100	P	S01
137	K102	100	P	S01
138	K103	100	P	S01
139	K104	100	P	S01
140	K105	100	P	S01
141	K106	100	P	S01
142	K107	100	P	S01
143	K108	100	P	S01
144	K109	100	P	S01

Line Number	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D(1). Process Codes
145	K110	100	P	S01
146	K111	100	P	S01
147	K112	100	P	S01
148	K113	100	P	S01
149	K114	100	P	S01
150	K115	100	P	S01
151	K116	100	P	S01
152	K117	100	P	S01
153	K118	100	P	S01
154	K119	100	P	S01
155	K123	100	P	S01
156	K124	100	P	S01
157	K125	100	P	S01
158	K126	100	P	S01
159	K131	100	P	S01
160	K132	100	P	S01
161	K136	100	P	S01
162	K141	100	P	S01
163	K142	100	P	S01
164	K143	100	P	S01
165	K144	100	P	S01
166	K145	100	P	S01
167	K147	100	P	S01
168	K148	100	P	S01
169	K149	100	P	S01
170	K150	100	P	S01
171	K151	100	P	S01
172	K156	100	P	S01
173	K157	100	P	S01
174	K158	100	P	S01
175	K159	100	P	S01
176	K161	100	P	S01
177	K169	100	P	S01
178	K170	100	P	S01
179	K171	100	P	S01
180	K172	100	P	S01
181	K174	100	P	S01

Line Number	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D(1). Process Codes
182	K175	100	P	S01
183	K176	100	P	S01
184	K177	100	P	S01
185	K178	100	P	S01
186	K181	100	P	S01
187	P001	5	P	S01
188	P002	5	P	S01
189	P003	5	P	S01
190	P004	5	P	S01
191	P005	10	P	S01
192	P006	5	P	S01
193	P007	5	P	S01
194	P008	5	P	S01
195	P009	5	P	S01
196	P010	100	P	S01
197	P011	15	P	S01
198	P012	50	P	S01
199	P013	25	P	S01
200	P014	15	P	S01
201	P015	50	P	S01
202	P016	5	P	S01
203	P017	5	P	S01
204	P018	5	P	S01
205	P020	5	P	S01
206	P021	25	P	S01
207	P022	50	P	S01
208	P023	5	P	S01
209	P024	5	P	S01
210	P026	5	P	S01
211	P027	5	P	S01
212	P028	25	P	S01
213	P029	25	P	S01
214	P030	500	P	S01
215	P033	5	P	S01
216	P034	5	P	S01
217	P037	5	P	S01
218	P039	5	P	S01

Line Number	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D(1). Process Codes
219	P040	5	P	S01
220	P041	5	P	S01
221	P042	5	P	S01
222	P043	5	P	S01
223	P044	5	P	S01
224	P045	5	P	S01
225	P046	5	P	S01
226	P047	5	P	S01
227	P048	100	P	S01
228	P049	5	P	S01
229	P050	5	P	S01
230	P051	5	P	S01
231	P054	5	P	S01
232	P057	5	P	S01
233	P058	5	P	S01
234	P059	5	P	S01
235	P060	5	P	S01
236	P062	5	P	S01
237	P064	25	P	S01
238	P066	5	P	S01
239	P067	5	P	S01
240	P068	5	P	S01
241	P069	5	P	S01
242	P070	5	P	S01
243	P071	5	P	S01
244	P072	5	P	S01
245	P073	5	P	S01
246	P074	25	P	S01
247	P075	50	P	S01
248	P077	50	P	S01
249	P082	5	P	S01
250	P084	5	P	S01
251	P085	5	P	S01
252	P087	150	P	S01
253	P088	5	P	S01
254	P089	5	P	S01
255	P092	5	P	S01

Line Number	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D(1). Process Codes
256	P093	5	P	S01
257	P094	5	P	S01
258	P097	10	P	S01
259	P098	100	P	S01
260	P099	5	P	S01
261	P101	5	P	S01
262	P102	5	P	S01
263	P103	5	P	S01
264	P104	25	P	S01
265	P105	100	P	S01
266	P106	150	P	S01
267	P108	5	P	S01
268	P109	5	P	S01
269	P110	5	P	S01
270	P111	5	P	S01
271	P113	5	P	S01
272	P114	5	P	S01
273	P115	5	P	S01
274	P116	5	P	S01
275	P118	5	P	S01
276	P119	5	P	S01
277	P120	25	P	S01
278	P121	25	P	S01
279	P122	5	P	S01
280	P123	5	P	S01
281	P127	5	P	S01
282	P128	5	P	S01
283	P185	5	P	S01
284	P188	5	P	S01
285	P189	5	P	S01
286	P190	5	P	S01
287	P191	5	P	S01
288	P192	5	P	S01
289	P194	5	P	S01
290	P196	5	P	S01
291	P197	5	P	S01
292	P198	5	P	S01

Line Number	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D(1). Process Codes
293	P199	5	P	S01
294	P201	5	P	S01
295	P202	5	P	S01
296	P203	5	P	S01
297	P204	5	P	S01
298	P205	5	P	S01
299	U001	500	P	S01
300	U002	1,000	P	S01
301	U003	1,000	P	S01
302	U004	5	P	S01
303	U005	5	P	S01
304	U006	50	P	S01
305	U007	500	P	S01
306	U008	250	P	S01
307	U009	100	P	S01
308	U010	5	P	S01
309	U011	5	P	S01
310	U012	500	P	S01
311	U014	5	P	S01
312	U015	5	P	S01
313	U016	5	P	S01
314	U017	5	P	S01
315	U018	5	P	S01
316	U019	500	P	S01
317	U020	5	P	S01
318	U021	500	P	S01
319	U022	5	P	S01
320	U023	5	P	S01
321	U024	5	P	S01
322	U025	5	P	S01
323	U026	5	P	S01
324	U027	5	P	S01
325	U028	5	P	S01
326	U030	5	P	S01
327	U031	500	P	S01
328	U032	25	P	S01
329	U034	5	P	S01

Line Number	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D(1). Process Codes
330	U035	5	P	S01
331	U036	50	P	S01
332	U037	500	P	S01
333	U038	5	P	S01
334	U039	5	P	S01
335	U041	5	P	S01
336	U042	5	P	S01
337	U043	5	P	S01
338	U044	2,000	P	S01
339	U045	5	P	S01
340	U046	5	P	S01
341	U048	10	P	S01
342	U049	5	P	S01
343	U050	5	P	S01
344	U051	5	P	S01
345	U052	50	P	S01
346	U053	5	P	S01
347	U055	5	P	S01
348	U056	500	P	S01
349	U057	50	P	S01
350	U058	5	P	S01
351	U059	5	P	S01
352	U060	5	P	S01
353	U061	50	P	S01
354	U062	5	P	S01
355	U063	5	P	S01
356	U064	5	P	S01
357	U066	5	P	S01
358	U067	10	P	S01
359	U068	5	P	S01
360	U069	10	P	S01
361	U070	50	P	S01
362	U071	50	P	S01
363	U072	50	P	S01
364	U073	50	P	S01
365	U074	5	P	S01
366	U075	1,000	P	S01

Line Number	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D(1). Process Codes
367	U076	1,000	P	S01
368	U077	1,000	P	S01
369	U078	1,000	P	S01
370	U079	1,000	P	S01
371	U080	1,000	P	S01
372	U081	100	P	S01
373	U082	100	P	S01
374	U083	5	P	S01
375	U084	5	P	S01
376	U085	5	P	S01
377	U086	5	P	S01
378	U087	5	P	S01
379	U088	100	P	S01
380	U089	5	P	S01
381	U090	5	P	S01
382	U091	100	P	S01
383	U092	25	P	S01
384	U093	5	P	S01
385	U094	5	P	S01
386	U095	100	P	S01
387	U096	5	P	S01
388	U097	5	P	S01
389	U098	10	P	S01
390	U099	10	P	S01
391	U101	5	P	S01
392	U102	10	P	S01
393	U103	25	P	S01
394	U105	25	P	S01
395	U106	25	P	S01
396	U107	10	P	S01
397	U108	500	P	S01
398	U109	10	P	S01
399	U110	5	P	S01
400	U111	5	P	S01
401	U112	200	P	S01
402	U113	25	P	S01
403	U114	5	P	S01

Line Number	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D(1). Process Codes
404	U115	25	P	S01
405	U116	5	P	S01
406	U117	500	P	S01
407	U118	50	P	S01
408	U119	5	P	S01
409	U120	5	P	S01
410	U121	1,000	P	S01
411	U122	20,000	P	S01
412	U123	500	P	S01
413	U124	50	P	S01
414	U125	5	P	S01
415	U126	5	P	S01
416	U127	5	P	S01
417	U128	5	P	S01
418	U129	5	P	S01
419	U130	5	P	S01
420	U131	5	P	S01
421	U132	5	P	S01
422	U133	5	P	S01
423	U134	100	P	S01
424	U135	50	P	S01
425	U136	25	P	S01
426	U137	5	P	S01
427	U138	5	P	S01
428	U140	500	P	S01
429	U141	5	P	S01
430	U142	50	P	S01
431	U143	5	P	S01
432	U144	500	P	S01
433	U145	50	P	S01
434	U146	100	P	S01
435	U147	50	P	S01
436	U148	5	P	S01
437	U149	5	P	S01
438	U150	5	P	S01

Line Number	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D(1). Process Codes
439	U151	4,000	P	S01
440	U152	5	P	S01
441	U153	5	P	S01
442	U154	2,000	P	S01
443	U155	5	P	S01
444	U156	5	P	S01
445	U157	5	P	S01
446	U158	5	P	S01
447	U159	25	P	S01
448	U160	10	P	S01
449	U161	100	P	S01
450	U162	100	P	S01
451	U163	10	P	S01
452	U164	5	P	S01
453	U165	250	P	S01
454	U166	5	P	S01
455	U167	5	P	S01
456	U168	5	P	S01
457	U169	100	P	S01
458	U170	50	P	S01
459	U171	5	P	S01
460	U172	5	P	S01
461	U173	5	P	S01
462	U174	5	P	S01
463	U176	5	P	S01
464	U177	5	P	S01
465	U178	5	P	S01
466	U179	5	P	S01
467	U180	5	P	S01
468	U181	5	P	S01
469	U182	100	P	S01
470	U183	5	P	S01
471	U184	5	P	S01

Line Number	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D(1). Process Codes
472	U185	5	P	S01
473	U186	5	P	S01
474	U187	5	P	S01
475	U188	2,000	P	S01
476	U189	5	P	S01
477	U190	50	P	S01
478	U191	5	P	S01
479	U192	5	P	S01
480	U193	5	P	S01
481	U194	25	P	S01
482	U196	1,000	P	S01
483	U197	5	P	S01
484	U200	5	P	S01
485	U201	15	P	S01
486	U202	100	P	S01
487	U203	5	P	S01
488	U204	100	P	S01
489	U205	5	P	S01
490	U206	5	P	S01
491	U207	5	P	S01
492	U208	5	P	S01
493	U209	5	P	S01
494	U210	2,000	P	S01
495	U211	2,000	P	S01
496	U213	2,000	P	S01
497	U214	100	P	S01
498	U215	5	P	S01
499	U216	5	P	S01
500	U217	5	P	S01
501	U218	15	P	S01
502	U219	15	P	S01
503	U220	2,000	P	S01
504	U221	5	P	S01

Line Number	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D(1). Process Codes
505	U222	10	P	S01
506	U223	500	P	S01
507	U225	50	P	S01
508	U226	250	P	S01
509	U227	250	P	S01
510	U228	250	P	S01
511	U234	5	P	S01
512	U235	5	P	S01
513	U236	5	P	S01
514	U237	5	P	S01
515	U238	5	P	S01
516	U239	2,000	P	S01
517	U240	100	P	S01
518	U243	5	P	S01
519	U244	5	P	S01
520	U246	25	P	S01
521	U247	5	P	S01
522	U248	5	P	S01
523	U249	5	P	S01
524	U271	5	P	S01
525	U278	5	P	S01
526	U279	5	P	S01
527	U280	5	P	S01
528	U328	250	P	S01
529	U353	250	P	S01
530	U359	500	P	S01
531	U364	5	P	S01
532	U367	5	P	S01
533	U372	5	P	S01
534	U373	5	P	S01
535	U387	5	P	S01
536	U389	5	P	S01
537	U394	5	P	S01

Line Number	A. EPA Hazardous Waste No.	B. Estimated Annual Qty of Waste	C. Unit of Measure	D(1). Process Codes
538	U395	5	P	S01
539	U404	15	P	S01
540	U409	5	P	S01
541	U410	5	P	S01
542	U411	5	P	S01
543	MX01 (MD State Code)	10,000	P	S01
544	M001 (MD State Code)	10,000	P	S01
545	MT01 (MD State Code)	10,000	P	S01
546	B001 (NY State Code)	10,000	P	S01
547	B002 (NY State Code)	10,000	P	S01
548	B003 (NY State Code)	10,000	P	S01
549	B004 (NY State Code)	10,000	P	S01
550	B005 (NY State Code)	10,000	P	S01
551	B006 (NY State Code)	10,000	P	S01
552	B007 (NY State Code)	10,000	P	S01

Part A

RCRA Subtitle C
Site Identification Form

Last Update	Site Name	Site ID
06/23/2023	TRIUMVIRATE ENVIRONMENTAL - BALTIMORE, LLC	MDD093002384

1. Reason for Submittal	
Obtaining or updating an EPA ID number for an on-going regulated activity that will continue for a period of time. (Includes HSM activity) [Source N]	

2. Site ID
MDD093002384

3. Site Name
TRIUMVIRATE ENVIRONMENTAL - BALTIMORE, LLC

4. Site Location		
Street Number 1500	*Street 1* CARBON AVENUE	*Street 2*
Zip 21226	*City, Town or Village* BALTIMORE	*State* MARYLAND
Country UNITED STATES	*County* BALTIMORE CITY	
Latitude 39.239268	*Longitude* -76.581374	*Use Lat/Long as Primary Address* No

5. Site Mailing Address		
Street Number 1500	*Street 1* CARBON AVENUE	*Street 2*
Zip 21226	*City, Town or Village* BALTIMORE	*State* MARYLAND
Country UNITED STATES		

6. Site Land Type
Private

7. North American Industry Classification System (NAICS)
Primary NAICS 562910 - REMEDIATION SERVICES
Other NAICS 562998 - ALL OTHER MISCELLANEOUS WASTE MANAGEMENT SERVICES, 562219 - OTHER NONHAZARDOUS WASTE TREATMENT AND DISPOSAL

8. Site Contact Person		
First Name ANTHONY	*Middle Initial*	*Last Name* MERRITT
Title FACILITY MANAGER	*Email* AMERRITT@TRIUMVIRATE.COM	
Phone Number 410-636-3700	*Extension*	*Fax*

8a. Site Contact Address		
Street Number 1500	*Street 1* CARBON AVENUE	*Street 2*
Zip 21226	*City, Town or Village* BALTIMORE	*State* MARYLAND
Country UNITED STATES		

9a. Legal Owner #1		
Name CARBON PROPERTIES, INC.	*Date* 01/04/2008	*Type* Private
Street Number 200	*Street 1* INNER BELT ROAD	*Street 2*
Zip 02143	*City, Town or Village* SOMERVILLE	*State* MASSACHUSETTS
Country UNITED STATES		
Email DYOUNGEN@TRIUMVIRATE.COM		
Phone Number 888-834-9697	*Extension*	*Fax*
Public Comments dyoungen@triumvirate.com is replacing rbarry@triumvirate.com. Rbarry is retiring and is no longer a contact.		

9b. Legal Operator #1

Name	*Date*	*Type*
TRIUMVIRATE ENVIRONMENTAL (BALTIMORE), LLC	01/04/2008	Private
Street Number	*Street 1*	*Street 2*
1500	CARBON AVE	
Zip	*City, Town or Village*	*State*
21226	BALTIMORE	MARYLAND
Country		
UNITED STATES		
Email		
DYOUNGEN@TRIUMVIRATE.COM		
Phone Number	*Extension*	*Fax*
410-636-3700		
Public Comments		
dyoungen@triumvirate.com is replacing erosas@triumvirate.com. Erosas is no longer with the company.		

10. Type of Federal Regulated Waste Activity

A. Hazardous Waste Activities

1. Generator of Hazardous Waste (Federal)	*3. Treater, Storer, or Disposer of Hazardous Waste*	*6. Exempt Boiler and / or Industrial Furnace*
3 - Very Small Quantity Generator	No	None selected
	4. Receives Hazardous Waste from Off-site	
	No	
2. Short Term Generator	*5. Recycler of Hazardous Waste*	
No	None selected	

B. Waste Codes for Federally Regulated Hazardous Wastes

Hazardous Waste Codes (Federal)

D001, D002, D003, D018, F003, F005, U115, U123

C. Waste Codes for State Regulated (non-Federal) Hazardous Wastes

Hazardous Waste Codes (State)

None selected

11. Additional Regulated Waste Activities

A. Other Waste Activities

1. Transporter of Hazardous Waste	*3. United States Importer of Hazardous Waste*	*5. Importer/Exporter of SLABs*
a. Transporter	No	None selected
2. Underground Injection Control	*4. Recognized Trader*	
No	None selected	

B. Universal Waste Activities

1. Large Quantity Handler of Universal Waste

Accumulated/Managed:

- Batteries
- Mercury containing equipment
- Lamps

Generated:
None selected

2. Destination Facility for Universal Waste

No

C. Used Oil Activities

1. Used Oil Transporter	*3. Off-Specification Used Oil Burner*
a. Transporter b. Transfer Facility	No
2. Used Oil Processor and / or Re-refiner	*4. Used Oil Fuel Marketer*
None selected	a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner b. Marketer Who First Claims the Used Oil Meets the Specifications

D. Pharmaceutical Activities

Your state does not participate in Subpart P.

E. State Activities

State Activities

None selected

12. Eligible Academic Entities with Laboratories

Your state does not participate in Subpart K activities.

13. Episodic Generation

Are you an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves you to a higher generator category pursuant to 40 CFR Part 262 Subpart L? If "Yes", you must fill out the Addendum for Episodic Generator.

No

14. LQG Consolidation of VSQG Waste

Are you an LQG notifying of consolidating VSQG hazardous waste under the control of the same person pursuant to 40 CFR 262.17(f)?

No

15. Notification of LQG Site Closure for a Central Accumulation Area (CAA) (optional) and Entire Facility

LQG Site Closure of a Central Accumulation Area or Facility

No

16. Notification of Hazardous Secondary Material (HSM) Activity

Your state does not participate in HSM.

17. Electronic Manifest Broker

Are you notifying as a person, as defined in 40 CFR 260.10, electing to use the EPA electronic manifest system to obtain, complete, and transmit an electronic manifest under a contractual relationship with a hazardous waste generator?

No

18. Comments

Public Comments

Updated owner and operator contact email. Also updated generator status from LQG to VSQG due to current waste generation rates.

19. Certification

Certifier #1

First Name	*Middle Initial*	*Last Name*
Justin	T	Hartshorn
Title	*Email*	*Date Signed*
Corporate Compliance Auditor	jhartshorn@triumvirate.com	06/23/2023

Section Divide

Part B: Operational Details

1. Facility Description
2. Process Description
3. Waste Analysis Plan
4. Procedures to Prevent Hazards
5. Inspection Schedule
6. Waiver of Preparedness and Prevention Requirements
7. Equipment Requirements
8. Preventive Procedures, Structures and Equipment
9. Prevention of Reaction of Ignitable, Reactive and Incompatible Wastes
10. Personnel Training
11. Contingency Plan
12. Closure Plan and Financial Requirements
13. Closure Procedures
14. Closure Cost Estimate

10-Day Hazardous Waste Transfer Permit Application

Part B: Operational Details

Triumvirate Environmental (Baltimore), LLC
1500 Carbon Avenue
Baltimore, MD 21226

EPA ID No. MDD093002384

Initial Application Date: June 9, 2023
Revision #1: March 21, 2024

Table of Contents

Operational Details

1. Facility Description

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

1.1. General Description

Triumvirate Environmental (Baltimore), LLC (herein known as "TEI") is a CHS facility (herein known as the "truck transfer area") located at 1500 Carbon Avenue in Baltimore, MD. The EPA ID number associated with this CHS facility is MDD093002384.

A wide variety of hazardous and non-hazardous waste in various size containers are transferred between trucks and trailers at TEI. Licensed CHS haulers conduct all waste shipments to and from TEI. Containers of waste are transferred and remain on trucks and trailers located at TEI for up to 10 days and shipped to the disposal facilities indicated on the corresponding shipping documents. TEI is not authorized to treat, store or dispose of hazardous waste at the truck transfer area. The routine activities and operations performed at TEI's truck transfer area are described in **Section 2.0 "Process Description"**.

1.2. Property Description

TEI's property located at 1500 Carbon Avenue has geographic coordinates of 39.2396025, -76.5822561 in the city of Baltimore, Maryland. City records indicate that the property is zoned for industrial use and is approximately 2.5 acres in size. A topographic map depicting wells, springs, other water bodies, and drinking water wells located within a 1,000 foot radius of TEI has been provided as **Figure 1 "Topographic Maps"** in this permit. The topography of the site and surrounding vicinity is relatively level as indicated by the contour lines in **Figure 1 "Topographic Maps"**. **Figure 6 "Wind Rose"** includes a wind rose map for Baltimore International Airport (located less than 12 miles away) which represents prevailing wind speed and direction for the geographic region that encompasses the truck transfer area.

The site is surrounded by industrial properties on the east, west, north, and south sides. Sensitive receptors such as homes, schools, hospitals, nursing homes and day care centers are located beyond a 1,000-foot radius of the site. A map depicting the legal boundaries of the property and the surrounding land uses has been provided as **Figure 2 "Property Boundary and Land Use Map"**.

TEI is located outside of the 100-year flood plain as indicated in **Figure 3 "Flood Zone Map"**.

The TEI truck transfer area consists of a bermed, concrete containment pad. The area of the containment pad is approximately 104 feet by 65 feet (6,760 square feet) in size and is located at the truck to truck transfer area of the onsite warehouse. 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 4 "Site Plans"** in this permit. The normal path of vehicles entering and exiting the property is shown in **Figure 4c "Site Plan with Traffic Flow"**.

An aerial photograph depicting the features located within a 1-mile radius of the facility is shown in **Figure 1 "Topographic Maps".**

There is a warehouse building that is located centrally at the 1500 Carbon Ave location that will be designated for the truck to truck waste transfer operations.

1.3. Operations

Containers handled at the truck transfer area range in size from small sample containers (< 1 liter) to 330 gallons. Incoming waste containers are handled as described in **Section 2.0 "Process Description"**. All incoming wastes are subject to a qualification process in accordance with the Waste Analysis Plan (WAP) listed in **Section 3.0 "Waste Analysis Plan"**. Each container of transferred wastes that arrives at the truck transfer area is accompanied by shipping documents which indicate the generator of the waste and the address of the destination facility where the wastes will be treated, stored, or disposed. Vehicles entering and exiting the property will follow a traffic pattern that is indicated in **Figure 4c "Site Plan with Traffic Flow"**.

1.4. Owner/Operator Information

Triumvirate Environmental (Baltimore), LLC is the operator of the facility located at 1500 Carbon Ave and at 3200 Sun Street, Baltimore MD. The property is owned by Sun Street Properties, Inc. Both Triumvirate Environmental (Baltimore), LLC and Sun Street Properties, Inc. are wholly owned subsidiaries of Triumvirate Environmental, Inc., a privately-held a domestic corporation organized in Massachusetts and headquartered at 200 Innerbelt Road, Somerville, MA 02143. The names and addresses of shareholders, officers, and directors of TEI are provided in **Exhibit 1 "List of Corporate Officers"**.

1.5. Wastewater Management

The facility holds an NPDES stormwater general permit number 18OGT-2722 (MDG342722) for the discharge of stormwater and hydrostatic test water from oil terminals to surface waters of the state. If stormwater that collects within the bermed truck transfer area is known to be contaminated, it can be pumped into drums or a vacuum truck and shipped to a disposal facility internally approved by Triumvirate. If stormwater is not contaminated, it can be managed under the site's NPDES stormwater general permit.

1.6. Air Quality

TEI does not treat, store, or dispose of hazardous waste at 1500 Carbon Ave, Baltimore, MD 21226. TEI does not commingle or consolidate the contents of hazardous waste containers into other containers or receptacles. All hazardous waste containers managed at the truck transfer station are sealed prior to arrival at the site and remain closed until they are transported offsite to destinated facilities that are indicated on the corresponding shipping documents. There are no "emissions units" (as defined in COMAR 26.11.17.01B(11)) located at the truck transfer area.

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

1.7. Photographs

Photographs of the facility as required by COMAR 26.13.07.02D(12) are included in **Exhibit 2 "Site Photographs"**.

1.8. Preapplication Meeting

TEI hosted a preapplication public meeting on January 30, 2023 in accordance with COMAR 26.13.07.19-1B(2). Documents relevant to this meeting are included as **Exhibit 3 "Pre-Application Public Meeting Records"**.

The attendees of the meeting are noted in Exhibit 3; however, their titles were not included in the initial hand signed pre-application meeting document. The attendees and their titles are clarified below:

- Bryant Craig, Environmental, Transportation, Safety, and Compliance Specialist (ETSC) with Triumvirate
- Brian Shafle, Corporate Director of Environmental Projects with Triumvirate

2. Process Description

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

The truck-to-truck transfer at 1500 Carbon Ave will take place within the centrally located warehouse building with the transfer trucks sitting on an unsheltered concrete berm and pad. The location, design and layout of the property and including the truck transfer area is described in **Section 1.0 "Facility Description"**.

TEI does not treat, store, or dispose of hazardous waste material at the truck transfer area located at 1500 Carbon Ave. Each shipment of waste that arrives at TEI is accompanied by shipping documents that indicate a destination disposal facility that is permitted to receive and treat, store, or dispose of the associated waste. Shipping documents are held on the same vehicle or trailer on which the corresponding waste containers are held. Whenever a shipment of hazardous waste is transferred at TEI, the original, corresponding shipping documents shall be modified to reflect the continuing transport of the containers.

Hazardous and non-hazardous wastes arrive at the transfer area as cargo loaded on trucks that are owned and operated by Triumvirate. In addition to Triumvirate vehicles, other non-Triumvirate haulers that are permitted to transport hazardous materials may also serve the facility. Wastes are transferred between trucks and trailers will be held onsite 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 44,000 gallons. All waste containers that arrive at TEI are held within the closed cargo compartments of permitted trucks and trailers at all times except when the containers are being actively transferred.

TEI only transfers hazardous wastes that is permitted to be handled according to **Exhibit A-1 "Part A, Section 7 Waste Descriptions"**. Hazardous wastes arrive at the truck transfer area in sealed, DOT-approved containers described in **Section 2.1 "Containers"**. Each container of hazardous waste that arrives at the site remains closed. Containers are labeled and marked in a manner that reflects the chemical hazard within and segregated on trucks according to the DOT's Segregation and Separation Chart of Hazardous Materials (49 CFR 177.848) and special

permits issued by the DOT to Triumvirate Environmental.

Containers that hold ignitable or reactive waste are always located on trucks parked at least 15 meters from the property line.

Shipments of reactive wastes such as cyanides, spontaneously combustible compounds, and materials that are "dangerous when wet" are managed on trailers at the facility according to the regulations referenced 49 CFR Part 173. Specific segregation and staging methods of such containers are determined based on the chemical constituents, the volume, the container specification, and the packaging method of each container.

TEI uses a process described in **Section 3.1 "Waste Characteristics"** of this permit to evaluate waste shipments and ensure that precautions are taken to avoid receiving containers of potentially incompatible waste at the facility. Each container of waste that arrives at the facility is subject to a qualification process that requires generators to disclose the physical and chemical properties of the generator's waste. During the qualification process, TEI identifies containers with inner packaging's that have the potential to produce effects which are harmful to human health and environment if mixed. TEI is mindful not to accept materials packaged within a container that may mix and produce heat, pressure, fire, explosion, violent reaction, toxic dust/fumes/gases, or flammable fumes or gases including the examples listed in COMAR 26.13.05.25.E. Such containers represent a violation of DOT shipping regulations and must be repackaged prior to leaving the generator's address.

During non-working hours, copies of manifests and other shipping papers for any transferred waste remaining on trucks and trailers at the transfer area shall be immediately accessible and maintained either inside the cab of the vehicle or inside cargo area of the trailer.

2.1. Containers

Containers located on vehicles or trailers at the truck transfer area range in size from small sample containers (<1 liter) to 330 gallon totes.

TEI staff members use drum dollies, pallet jacks or other mechanical devices to move closed containers directly across dock plates laid down between trucks and trailers. Staff members evaluate each container before, during, and after each transfer. Containers are checked to ensure proper DOT packaging, when applicable. If a material is found to be in an improperly packaged container, the site will contact the generator and will overpack the container into a larger compatible container.

The containers are made of or lined with materials that will not react with, and are otherwise compatible with, the waste to be containerized. If a container holding hazardous wastes should begin rusting or leaking, or is otherwise found to be in poor condition, it will be overpacked into a larger compatible container.

2.2. Transfer Log

TEI maintains a log of all hazardous waste containers that are transferred between trucks and trailers at the site. During truck transfer operations, the transfer log is kept in the warehouse where the truck transfer occurs. The transfer log may be stored in the Facility Manager's office when truck transfer operations are not occurring. The following information is documented for each shipment that passes through the truck

transfer area:

2.2.1. generator name; and
2.2.2. manifest number; and
2.2.3. type/hazard class of the waste; and
2.2.4. the date the container is transferred to the transfer area; and
2.2.5. the date the container is transferred out of the transfer area.

While onsite, the original shipping documentation (hazardous waste manifest, bill of lading, etc.) for each vehicle is kept in the main office area. Copies of the shipping documentation for each vehicle are made and kept in the vehicle while the vehicle is onsite. When the vehicle leaves the site, the original shipping documentation is placed on the vehicle and the copies are filed in the main office area for a minimum of 3 years. In addition, information related to any shipping document can be looked up electronically through Triumvirate's Wasteland software.

2.3. Secondary Containment System Design and Operation

All truck transfer activity at the site is conducted on a containment pad that is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated rainfall. The containment pad is designed to meet the secondary containment requirements for TEI vehicles permitted to haul hazardous waste in Maryland. The containment pad is constructed of concrete and appropriately bermed to hold at least 10 percent of the total volume of the waste containers permitted to be held onsite. Please note, the largest single container volume on a truck is 330 gallons. If a leak or spill were to occur, 330 gallons is the most realistic volume that could be discharged to the secondary containment area.

The truck transfer area is equipped with two containment sumps located on opposite corners of the containment pad as indicated in **Figure 4 "Site Plans"**. The pad will be slightly sloped so water can be pumped from the sumps. The 2 inch berm depth is the *minimum* depth after the slope of the pad is taken into account.

During inclement weather events, precipitation collects in the containment area sump pits. TEI removes water from the sump pits and ground surfaces of the containment pad after the passing of each storm event. TEI removes water from the containment area by means of sorbents, pumps, or a vacuum truck. The water that has been removed will be evaluated for evidence of contamination. If there has been no evidence of a spill, the water may be discharged to a storm water drainage system. Records of any discharged water will be logged for recordkeeping purposes. If there is evidence of a spill or suspected contamination of the pad area, water accumulated on the pad will be collected in containers and sent offsite for disposal at a permitted disposal facility.

The calculations associated with the secondary containment pad are shown below:

Summary of Dimensions

Concrete Pad	Length (ft)	Width (ft)	Depth (in)
	104	65	2

Sump	Diameter (in)	Depth (in)
	16	28

Capacity Calculations

Concrete Pad (L x W x D)	1,126.67	ft^3
(1 cu. ft = 7.48052 gallons)	8,428.05	gallons
Sump (Π x r^2 x Depth)	5,626.88	in^3
(1 cu. ft = 7.48052 gallons)	3.26	ft^3
	24.36	gallons

Capacity Summary

Concrete Pad	8,428.05	gallons
Sump #1	24.36	gallons
Sump #2	24.36	gallons
Total Capacity	8,476.77	gallons

Maximum Volume of Material Held at the Truck Transfer Area =	44,000	gallons
10% of Max Volume Held at the Truck Transfer Area =	4,400	gallons
Realistic largest single container volume on a truck =	330	gallons

During a 25-year, 24-hour storm event Triumvirate will dedicate vacuum trucks or vacuum tankers for the to remove water from the containment pad until the storm has passed. A vacuum truck is capable of moving 200 gallons per minute of water. In addition, no waste transfer would occur during a storm event that impacted the ability of the secondary containment to provide adequate capacity for 10% of the max volume held at the truck transfer area.

Point Precipitation Frequency Estimates collected from the NOAA station in Baltimore (site ID: 18-0465) on 9/17/2014 indicate that a 25-year, 24-hour storm event in the immediate area would yield 6.13 inches of precipitation[1]. The total volume of water that could accumulate in the truck transfer area is calculated below:

[1] Source: NOAA's National Weather Service: Hydrometeorological Design Studies Center

25-year, 24-hour Storm Event Calculations

[Catchment Area (in^2) x Rainfall Height (in)] = Total Volume of Water (in^3)

Length of Containment	1,248	in
Width of Containment	780	in
Rainfall amount	6.13	in
(1,248 in. x 780 in.) x 6.13 in =	5,967,187	in^3

Conversion Factor: 1 US Gallon = 231 in^3

25-Year, 24-Hour Storm Event Accumulated Rainfall in Containment =	25,832	gallons
25-Year, 24-Hour Storm Event Gallons per Minute in Containment Area =	18	gallons
Vacuum Truck Removal Capability per Minute=	200	gallons

3. Waste Analysis Plan

The information provided in this section is submitted in accordance with the requirements of COMAR 26.13.05.02D.

3.1. Waste Characteristics

TEI works closely with each waste generator to ensure the characteristics associated with each waste item destined to be handled at the truck transfer area are documented properly on shipping papers (manifests, chain of custody, bill of lading, etc.).

TEI uses a waste qualification process to ensure that wastes handled at the transfer area conform to acceptance restrictions. The qualification process requires customers to submit waste profile forms or similar document to TEI for review and approval prior arrival at the transfer area. **Exhibit 4 "Waste Profile Example"** includes an example of a waste profile which may be used for review and approval during the waste qualification process. TEI stores information derived from the qualification process in an electronic database. During the qualification process, TEI examines the information disclosed by each generator on each waste profile form and makes note of the chemical and physical characteristics of the waste. Based on the results of the qualification process, TEI takes appropriate action to avoid transfer of prohibited materials/volumes at the transfer area. Appropriate action may include:

- Refusing to transport the waste; or
- Developing a strategy to ship the waste directly to a properly permitted treatment, storage, or disposal facility.

3.2. Chemical and Physical Analysis

TEI does not treat, store, or dispose of material at the truck transfer area. Therefore, TEI does not perform chemical and physical analysis on the waste containers that arrive at the site.

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

TEI staff 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.

3.3. Management Plan

Wastes handled at TEI are sealed and shipped in DOT-approved containers and are not opened at the truck transfer area. Unopened 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 TEI has not included in this application waste acceptance procedures for truck to transfer trailer wastes.

Each shipment of waste that is transferred at the site has a corresponding set of shipping documents (manifest, bill of lading or chain of custody). The shipping documents will be prepared in a manner that reveals the name and address of the generator and the name and address of the destination facility (treatment, storage, or disposal facility). The shipping documents will not identify TEI as the destination facility. Prior to pick-up by TEI, the generator completes a waste profile form and obtains approval from the destination disposal facility, which signifies that the waste has been approved for acceptance in accordance with the designated disposal facility's Waste Analysis Plan.

4. Procedures To Prevent Hazards

The information provided in this section is submitted in accordance with the requirements of COMAR 26.13.07.02D(18), (19), (20), (22), and (24). Other regulations addressed to complete this section include COMAR 26.13.05.02E, F, H; 26.13.05.03C, D, E, F; 26.13.05,09E, F, G; 26.13.07.02E(1)(a), (b), (c).

4.1. Security

Triumvirate Environmental (Baltimore), LLC has prepared the following plan to prevent unauthorized entry of person or livestock into the truck transfer area and possible disturbance of waste transfer activities. The plan describes the precautions taken by TEI to prevent unknowing entry and minimize the possibility of unauthorized entry of persons onto the transfer area property. The plan also lists specific measures that TEI has taken to comply with the standards relative to signage, automated surveillance, and physical obstructions that prevent unauthorized entry.

4.2. Security Procedures and Equipment

The truck transfer area is located on a 2.50 acre parcel of land at 1500 Carbon Ave, Baltimore MD. The property is surrounded by an eight foot high perimeter fence that encloses the entire property. There is a gate located on the western part of the perimeter facing Sun Street. The gate is locked when TEI employees are not performing work at the site and kept closed when TEI employees are working within the perimeter. The perimeter fence and padlocks

for the gate are inspected weekly 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 rest at 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 TEI personnel are present.

Entry to the truck transfer area is limited only to TEI employees. Non-TEI personnel that are allowed access into the truck transfer area must be escorted by TEI personnel.

4.3. Barrier

The property located at 1500 Carbon Ave is surrounded with an eight foot perimeter fence. Access onto the property is limited by padlocked gates. Each gate, truck and trailer inside the truck transfer area is locked or padlocked when TEI personnel are not present.

4.4. Means to Control Entry

Access to the truck transfer area is limited to TEI employees. Entry to the truck transfer area is controlled by gate access. The gate is padlocked when TEI personnel are not present. All visitors are required to be escorted by TEI personnel.

4.5. Warning Signs

Signs with the legend “Danger - Unauthorized Personnel Keep Out” are posted on the fence around the truck transfer area. They are posted so that they can be seen from a distance of 25 feet. Also, “No Smoking” signs, which are legible at a distance of 25 feet, have been placed in the vicinity of the transfer area.

5. Inspection Schedule

5.1. General Inspection Requirements

TEI conducts inspections routinely to detect any problems or potential problems with the management of hazardous waste at the truck transfer area, 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 errors, 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 TEI to ensure that 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.

5.2. Inspection Summary

Table 1 “Inspection Schedule Summary” is a summary list of the areas in the truck transfer area, safety and emergency equipment, and security devices that require routine inspection. The list also identifies the inspection frequency for each item. The items in **Table 1 “Inspection Schedule Summary”** are inspected to prevent, detect, or respond to environmental or human health hazards.

Table 1: Inspection Schedule Summary		
Inspection Item	**Frequency of Inspection**	**Inspection Form**
Parked Vehicles	Daily	Exhibit 5 "Daily Inspection Sheet"
Areas Subject to Spills		
Waste Containers		
Waste Volume		
Gates/Entry Doors		
Perimeter Fence	Weekly	Exhibit 6 "Weekly Inspection Sheet"
Signage		
Containment		
Emergency Equipment		

5.3. Frequency of Inspection

Table 1 "Inspection Schedule Summary" identifies the frequency of inspections for each item on the inspection schedule.

5.4. 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. TEI 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, TEI 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 to the environment and/or human health, corrective or remedial action shall be taken immediately. TEI 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.

5.5. Inspection Log

The results of all inspections are entered into the inspection log. The log is kept on file at the local branch office located at 1500 Carbon Avenue as part of the truck transfer area's operating record. Records of inspections will be kept on site for at least three years from the date of inspection. Examples of the inspection log sheets are shown in

Exhibit 5 "Daily Inspection Sheet" and **Exhibit 6 "Weekly Inspection Sheet"**.

5.6. 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. All inspections and results are recorded on an inspection log.

5.7. 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 labeling per DOT regulations. If a container is leaking, corroded, or rusted, or if it does not have the correct DOT/UN specifications, the container will be overpacked.

Inspections of the containers managed at the truck transfer area are also conducted per the inspection schedule provided in **Table 1 "Inspection Schedule Summary"**. Results of each inspection are recorded on **Exhibit 5 "Daily Inspection Sheet"**.

Inspections of safety and security equipment also are conducted per the inspection schedule provided in **Table 1 "Inspection Schedule Summary".** Results of these inspections are recorded on **Exhibit 6 "Weekly Inspection Sheet"**. Information specified on the log includes the inspector's name and title, date and time of inspection, item of inspection, status of the item, observations, and the date and nature of repairs and remedial or corrective action.

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

6. Waiver or Documentation of Preparedness and Prevention Requirements

TEI does not seek a waiver of the preparedness and prevention requirements.

7. Equipment Requirements

Internal and external communications, emergency equipment, fire control equipment, and spill clean-up equipment are addressed in this section. Additional information is found in the site Contingency Plan.

7.1. Internal Communication Devices

Cellular phones or an airhorn is used within the truck transfer area to alert others of emergency situations. All TEI personnel have cellular phones. TEI personnel are trained to recognize that a single, extended blast from the airhorn for more than 3 seconds indicates an emergency situation and an urgent need for assistance. The airhorns are inspected weekly to verify that they are operational.

7.2. External Communication Devices

Telephones are located the 1500 Carbon Avenue office and can be used to summon emergency assistance from the police, fire department, or other response units. In addition, all TEI personnel have cellular phones.

7.3. Emergency Equipment

An emergency equipment inspection checklist is included in **Exhibit 6 "Weekly Inspection Sheet"**. The list of emergency equipment and the inspection schedule for the emergency equipment is shown in **Table 2 "List of Emergency Equipment and PPE"**.

Table 2: List of Emergency Equipment and PPE

Item	Minimum Quantity	Inspection Frequency*
Dry Chemical Agent Fire Extinguishers to cover Class A, B, and C fires	4	Weekly
Sorbents (bail)	1	Weekly
Speedi-Dry (16 lb bag)	1	Weekly
Spill Booms	9 ft of coverage	Weekly
Acid Neutralizer	1, 40-50 lb bag	Weekly
Caustic Neutralizer	1, 40-50 lb bag	Weekly
Overpacks	1	Weekly
Tyvek Suit	1 box	Weekly
Gloves	1 box	Weekly
Rubber Boots	2 pairs	Weekly
Airhorn	1	Weekly
SCBA	2	Weekly
**Tamper evident tape, or equivalent means of security, may be used to indicate that items have not changed since the previous inspection.*		

7.4. Water and Fire Control

The truck transfer area is equipped with fire extinguishers. All TEI 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 past 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 area. The location of accessible fire hydrants is shown in **Figure 4a "Site Plans"**. The northwest fire hydrant is ~200 feet from the center of the 1500 Carbon Ave property. The southwest fire hydrant is ~280 feet from the center of the 1500 Carbon Ave property.

7.5. Testing and Maintenance of Equipment

Emergency equipment is inspected according to the schedule included as **Table 1 "Inspection Schedule Summary"** and the inspections are logged on **Exhibit 6 "Weekly Inspection Sheet"**.

Fire extinguishers are inspected by a qualified 3rd party vendor at least once per year.

7.6. Access to Communication or Alarm System

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

7.7. Aisle Space Requirement

All waste containers are moved directly from the trucks to their designated transfer trailer. Trucks and trailers are packed in accordance with DOT requirements.

7.8. Documentation of Arrangements

Copies of the Contingency Plan will be sent to fire departments, TEI's emergency response contractor, the nearest hospital, and the Maryland Department of the Environment (MDE) Land Management Administration (LAS). **Section 16 "Mutual Aid Organizations"** contains a list of organizations that have received copies of the Contingency Plan.

Proof that copies of the Contingency Plan have been sent to emergency response agencies will be kept on file. Proof of submittal may take the form of a certified delivery receipt to the agency via USPS, UPS, or FedEx, or an email response from the emergency response agency confirming receipt. Once the Contingency Plan has been received by an emergency response agency, Triumvirate will follow-up with the agency to confirm they understand the operations of the facility and their potential role in emergency response. This follow-up will be documented in a note to file.

8. Preventive Procedures, Structures and Equipment

8.1. 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 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.

8.2. Water Supplies

Transfers of hazardous waste containers occur in the truck transfer area on the containment pad. The containment pad is designed to meet secondary containment requirements for all transfer materials. The surface of the containment pad is made of concrete and is surrounded by berms. Any spills will be contained within the transfer trailer or within the containment pad. Therefore, there is no potential for contamination of water supplies.

8.3. 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.

8.4. Personnel Protection Procedures

At least once each week, all personal protective equipment maintained on site, as listed in **Table 2 "List of Emergency Equipment and PPE"** and referenced in the Contingency Plan, shall be inventoried and checked for full operational status. A list of protective equipment is presented under Emergency Equipment and Provisions of the Contingency Plan.

8.5. Procedures to Minimize Releases to the Atmosphere

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

9. Prevention of Reaction of Ignitable, Reactive and Incompatible Wastes

TEI's waste qualification process ensures that incompatible waste types are not transported. All TEI personnel who handle waste at generator sites or the truck transfer area have been trained on the proper identification and handling of wastes. Only properly-trained TEI personnel are authorized to move wastes between trucks and trailers.

Section 10.0 "Training" provides details of the required training program for handling ignitable or reactive waste.

Since a wide variety of wastes are transferred on site, separation of wastes on vehicles and trailers shall be performed with strict adherence to DOT regulations. Waste that is transferred between trucks and trailers is loaded as cargo according to the DOT's *Segregation and Separation Chart for Hazardous Materials* (49 CFR 177.848) and special permits issued by the DOT to Triumvirate Environmental. The DOT's *Segregation Table for Hazardous Materials* listed in 49 CFR 177.848 is included as **Figure 5 "DOT Segregation Table"**. A list of DOT special permits used by TEI is included in **Exhibit 8 "DOT Special Permits"**.

Containers of waste remain closed while located at the truck transfer area. TEI does not commingle or consolidate the contents of waste containers at the transfer area. The truck transfer area is inspected daily to ensure that containers located onsite are free of leaks and ignitable, reactive, and incompatible wastes are properly segregated.

9.1. Precautions to Prevent Accidental Ignition or Reaction of Ignitable or Reactive Wastes

The truck transfer area is used for the 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 area are clearly marked with labels that identify the contents and the appropriate DOT hazardous class. Trucks and trailers parked at the truck transfer area are marked with placards that indicate the presence of ignitable, combustible, or reactive materials (above DOT volume thresholds) on board.

The truck transfer area is 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 area. Smoking and open flames are strictly prohibited in the truck transfer area while containers of ignitable or reactive materials are being handled. Signs are placed in the transfer area that clearly read "No Smoking".

10. Personnel Training

The purpose of this plan is to describe the training that Triumvirate personnel must receive to ensure that they are prepared to perform their duties related to hazardous waste management at the facility. The Triumvirate training plan has been developed in accordance with COMAR 26.13.05.02G and 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 are conducted and documented for all hazardous waste managed at the transfer facility.

The training program at TEI may fall into one of two categories per COMAR 26.13.05.02.G:

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 TEI 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. This 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.

10.1. 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. TEI personnel must successfully complete applicable training within six months from the date of their employment or upon being assigned to a new position at TEI. All personnel directly involved with the CHS transfer operations will have 24 hour HAZWOPER training.

10.2. Annual Review

All personnel involved with management of hazardous waste at the facility are categorized by job title (see **Exhibit 7 "Job Descriptions"**) and take part in an annual review of their initial training. This training is documented and modified if found to be inadequate. The program must include a review of the existing training program, 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.

10.3. Outline of Training Module Contents

The training program at Triumvirate has been broken down into distinct modules. The content of each module is

described and is outlined in **Table 3 "Training Content"**.

Table 3: Training Content				
Module	**Title**	**Description**	**Application**	
			Classroom	**OTJ***
A	**Intent of the Training Program**	- Purpose - Content - Annual Review	✓	
B	**Corporate and Individual Responsibilities and Liabilities**	Liability and risk discussion	✓	
C	**Operations at Triumvirate**	- Storage Facility - Regulatory Status - CHS Transfer Facility Permit	✓	
D	**Waste Identification**	- Hazardous Waste Identification System - US EPA Hazardous Waste - Maryland Hazardous Waste Regulations - Waste Acceptance at Triumvirate	✓	
E	**Chemical Hazards**	- Chemical/Physical Properties - Occupational Exposure	✓	✓
F	**Waste Handling**	- Safety Precautions - Safety Equipment - Spill Containment & Cleanup	✓	✓
G	**Waste Acceptance**	- Waste Analysis (qualification) - Condition of Containers - Rejection of Shipments - Manifest Review and Processing - Manifest Discrepancies	✓	✓
H	**Waste Storage**	- Location at Triumvirate - Design & Construction of Facility - Waste Segregation	✓	✓
I	**Site Inspection Requirements**	- Review of Inspection Form - Location of Items Subject to Inspection	✓	✓
J	**Emergency Procedures**	- Contents and Intent of Contingency Plan - Implementation of Contingency Plan - Notification of Procedures - Response to Fires or Explosions - Response to Ground Water Contamination Incidents - Spill Containment and Cleanup - Shutdown of Operations - Evacuation Procedures - Communications - Arrangements with Authorities	✓	✓

Table 3: Training Content				
Module	**Title**	**Description**	**Application**	
			Classroom	**OTJ***
		- Review of Emergency Coordinator's Role		
K	**Emergency Equipment**	- Available at Triumvirate - Locations at Triumvirate - Use of equipment - Inspection of equipment - Replacement/Repair	✓	✓
L	**Emergency Coordinator Duties**	- Role/Authority/Knowledge (required) - Responsibilities - Availability - Review of all Aspects of Contingency Plan	✓	
M	**Waste Shipment Requirements**	- Use of DOT Requirements - Proper Manifest Completion - Drum Marking & Labeling	✓	✓
N	**Reporting & Recordkeeping**	- Spill and Incident Reporting - Hazardous Substances (RQs) - Manifests - Inspections Logs - Waste Analysis Records - Training Records - Correspondences - Record Retention	✓	✓
**On-the-Job Training*				

10.4. Designation of Training Modules Specific to Job Titles

Table 4 "Training Module Summary" is a list of the training modules to be conducted for each job title listed in **Exhibit 7 "Job Descriptions"**. The training requirements are only applicable to personnel who actively affect compliance of the Carbon Avenue CHS transfer permit.

Table 4: Training Module Summary	
Job Title	**Training Module to be Conducted**
Facility Manager	All Modules
Compliance Specialist	All Modules
Technical Service Representative	A, B, E-H, M
Operations Manager	A-H, J-K, M, N
Operations Staff Member	A-H, J-K, M, N

10.5. Individuals Qualified to Train

The Facility Manager, Compliance Specialist, or qualified designees will perform classroom and on-the-job training of all new personnel and will conduct an annual review of all training. The Facility Manager and Compliance Specialist will maintain his/her knowledge of regulations and procedures through self-study, on-the-job experience, and by attending seminars on the subject.

10.6. Training Records

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

- The names of all current or former TEI staff members who have filled the relevant positions within the last 3 years.
- Documentation indicating that current and former TEI staff members have received adequate initial and annual training. Records should include the module name and date that each training was completed.
- Copies of training records for individual staff members will remain onsite for at least three years after a TEI staff member's end of employment date or until closure for current employees.

11. Contingency Plan

See **Exhibit 10 "Contingency Plan"** for the stand-alone plan. The contingency plan will include a description of arrangements agreed to by outside agencies to coordinate emergency services, pursuant to the requirements of COMAR 26.13.05.03H, once such arrangements are finalized.

12. Closure Plan and Financial Requirements

The closure plan meets the requirements of COMAR 26.13.05.07.02D(29), (31); 26.13.05.07A, B, C, D, E, F; and 26.13.05.08A for closure of the Triumvirate Baltimore facility.

The plan describes how the facility will perform closure activities and the steps that will be necessary to completely close the facility at the end of its intended operating life. TEI will maintain a copy of the approved closure plan and all revisions to the plan on site.

12.1. Closure Performance Standard

The plan is designed so that TEI can close in a manner that:

1. Controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous wastes, hazardous waste constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground or surface waters or the atmosphere,
2. Minimizes the need for further maintenance or controls, and
3. Complies with State and Federal closure requirements.

TEI intends to use best management practices to minimize spills and releases throughout the life of the facility. Good housekeeping will be emphasized in order to simplify closure activities to the greatest extent possible.

The plan includes:

- A description of how and when the facility will be ultimately closed;
- An estimate of the maximum inventory of hazardous and non-hazardous waste in the transfer area at any given

time;

- A description of the steps needed to decontaminate structures and surfaces that have been in contact with hazardous waste during waste transfer operations; and,
- A schedule for final facility closure.

12.2. Time and Activities Required for Partial Closure and Final Closure

12.2.1. Final Closure: All wastes managed at TEI are manifested to a generator designated final disposal facility. TEI or a third party will transport the waste to the final disposal facility. The transfer area along with the containment pad will be decontaminated and any wash waters will be collected and pumped into a container. Depending upon the results of the wash water analysis, the wash waters will be either conveyed to a public wastewater treatment facility or disposed of at a permitted disposal facility. TEI anticipates completing closure within 180 days after receipt of the final volume of hazardous wastes. A schedule of closure activities is provided in Section 12.4 below.

12.2.2. Certification of Closure: Within 60 days of completion of final closure, TEI will submit certification by both TEI and an independent Professional Engineer registered in the State of Maryland that the facility has been closed in accordance with specifications in the approved closure plan. The certification will be submitted to the Director of the Land Management Administration.

12.3. Removal of Hazardous Waste Inventories

Upon closure of the facility all inventories of hazardous waste in the transfer area shall be shipped to the designated disposal facility listed on the shipping document. Removal of all waste shall be completed within a maximum of 10 days of initiation of closure.

Waste is not stored at the TEI facility, therefore it is anticipated that no more than 8 trailers containing no more than 44,000 gallons of containerized waste will be present at the facility at the time of closure.

12.4. Schedule for Closure

Table 6 "Closure Schedule" provides the schedule for closure of the TEI facility. The schedule includes the total time required for final closure.

Table 6: Closure Schedule	
Closure Activity	**Time Period (days)**
Notify MDE in writing of intention to initiate closure	Day 0
Prepare to begin closure activities	Day 0 – Day 45
Deadline to stop receiving waste at the facility	Day 15

Table 6: Closure Schedule	
Closure Activity	**Time Period (days)**
Begin closure activities	Day 45
Ship all waste containers offsite for final disposal	Day 45 – 50
Decontaminate all surfaces of the truck transfer area	Day 50 – 55
Collect samples of rinsate for lab analysis	Day 50 – 55
Receive and review lab analysis	Day 55 – 60
Receive Professional Engineer's certification	Day 60
Complete closure certification report	Day 60 – 90
Time allowed for unforeseen delays or additional decontamination efforts	Day 90 – 180
Deadline for delivery of closure certification report to MDE	Day 180

12.5. Time Allowed for Closure

Within 30 days after the date on which the TEI receives the known final volume of hazardous wastes, TEI will initiate final closure activities. TEI will notify MDE of its intent to begin closure at least 45 days prior to the closure start date. The TEI anticipates completing closure within 180 days after receipt of the final volume of hazardous wastes.

TEI will submit a closure certification report from an authorized TEI representative. The report will be reviewed and certified by a Professional Engineer registered in the State of Maryland.

12.6. Extensions for Closure Time

TEI does not anticipate exceeding the 180 day limit for completing all closure activities. However, if an unanticipated need does develop, TEI will submit a request to MDE for a revised schedule for closure that justifies the additional time required. If a request is submitted, TEI will justify it by demonstrating one of the following:

- Closure activities require longer than 180 days;
- A reasonable likelihood exists that an individual or group other than the TEI will recommence operation of the facility within one year;
- Closure is incompatible with continued operation, and the TEI has demonstrated that all steps have and will be taken to prevent threats to human health and the environment from the inactive transfer area.

13. Closure Procedures

The TEI will perform the closure procedures below for the facility and its equipment. At the time when a determination has been made to implement closure, there will be a review of the facility operating record and interviews of persons that have institutional knowledge of facility operations to determine if there have been any instances of releases during facility operations, and if all such releases were properly cleaned up. This information, along with any visual evidence of areas of potential concern (such as staining or cracks in containment structures), and any other relevant information, will be used to identify any areas that should receive heightened attention during closure.

Based on institutional knowledge of facility operations and visual observations of the site at the time of closure, a sampling and analysis plan will be developed and submitted to MDE for approval. The sampling and analysis plan will establish criteria that will be used to evaluate whether the decontamination activities have been successful and will include analytes and parameters to be considered, testing criteria, sampling designs, etc.

All personnel directly involved in closure activities will have Level D personal protective equipment available, including coveralls, safety glasses, safety shoes, hard hats, and gloves. Additional personal protective equipment may be necessary depending on the level of contamination encountered. Employee decontamination will be conducted as necessary and will include washing boots, disposing of expendable personal protective equipment such as gloves and dust masks, and hand washing.

13.1. Inventory Removal

All wastes managed at the truck transfer area are manifested to a final disposal facility. The waste generators have contracted with the final disposal facility for disposal costs prior to TEI pick-up and transfer. TEI or a third party will transport the waste to the final disposal facility.

Upon initiation of this closure plan, the closure manager will devise an operational protocol that establishes the appropriate hierarchy for closing the facility. In devising the operational protocol, the manager will (1) identify the type and characteristics of the wastes and inventory, (2) identify the operational status of all equipment and arrange for necessary repairs, and (3) ensure adequate staffing so that the closure plan schedule is accomplished.

13.2. Disposal or Decontamination of Equipment, Structure, and Soils

No hazardous wastes will be left on site. All related structures and equipment will be decontaminated during closure. The exact nature of the decontamination effort will be determined based on a review of the facility's operating records. Operating records include detailed descriptions and data relevant to any major spills of hazardous waste that have occurred at the site since the facility's establishment. Specific supplies, equipment and techniques employed during the decontamination effort will be prescribed and approved based on the type of residual contamination that may exist as a result of spills that have occurred at the facility.

Wash water from the decontamination effort will be pumped into a container designed for accumulation and storage of wastewater. Samples of the wash water will be collected and analyzed for full TCLP, and RCRA characteristics. Depending upon the results of wash water analysis, the wash waters will either be conveyed to a wastewater treatment facility or transported to a permitted disposal facility.

A professional engineer will inspect the transfer area after decontamination has taken place.

13.3. Certification of Closure

Within 60 days of completing closure activities, the site will submit a closure certification report to MDE. The report will be reviewed and certified by a professional engineer registered in the State of Maryland to demonstrate compliance with the approved closure plan.

The closure certification report will include the following:

- A copy of all operating records relevant to spills that have occurred at the facility;
- A description of closure field tasks performed;
- Written statements, correspondences, or justifications demonstrating that the decontamination procedures were appropriate and developed based on a review of the operating records;
- A chronological field log of closure activities;
- A description of closure sampling protocols;
- A description/discussion of analytical data;
- The operating status of the facility;
- Professional Engineer certification;
- An appendix containing a directory of project contacts;
- An appendix containing laboratory analytical testing results;
- An appendix containing a copy of the approved Closure Plan;
- An appendix containing photo documentation of closure activities.

14. Closure Cost Estimate

The closure cost estimate for the site is shown in in **Exhibit 9 "Closure Cost Estimate"**. The cost estimate is based on the following assumptions:

- Third party operators will implement the closure plan using on-site equipment and processes;
- On-Site equipment and structures will be functional and can be repaired at minimal cost;
- No catastrophic releases of widespread contamination have occurred and affected areas outside the area identified as the "truck transfer area" on **Figure 4 "Site Plans"**;
- Operating records identifying the contents of hazardous waste containers are available.

The itemized cost estimate is provided in **Exhibit 9 "Closure Cost Estimate"**. TEI will adjust the closure cost estimate for inflation within 60 days prior to the anniversary date of the establishment of the financial instrument used to comply with financial assurance. This will be done annually during the active life of the facility. Decontamination costs assume that the entire floor ground surface of the containment pad will require decontamination. Sampling and lab analysis costs assume that one sample of rinsate from each quadrant of the containment pad will be collected and sent to a laboratory for chemical analysis to confirm that the decontamination effort was successful.

14.1. Financial Assurance for Closure

Evidence of compliant financial assurance as required by Code of Maryland Regulations (COMAR) 26.13.05.08, will be provided to MDE before the facility begins operations.

14.2. Liability Requirements

Before beginning facility operations, Triumvirate Environmental (Baltimore) LLC will provide MDE with documentation required by 40 CFR 264.147, as incorporated by reference by COMAR 26.13.05.08, to demonstrate that requirements concerning liability coverage have been met. TEI will deliver to MDE, a certificate of liability insurance that is worded as specified in 40 CFR 264.151(j), as modified by COMAR 26.13.05.08.

Figures

Figure 1: Topographic Map

- Figure 1a: Topographic Map with 1-Mile Radius (2,000 ft scale)
- Figure 1b: Topographic Map with 1-Mile Radius (1,000 ft scale)
- Figure 1c: Google Terrain Map

Figure 2: Property Boundary and Land Use Map

- Figure 2a: Property Boundary Map
- Figure 2b: Land Use Map

Figure 3: Flood Zone Map

Figure 4: Site Plans

- Figure 4a: Current Site Plan with ER Equipment
- Figure 4b: Site Plan with Proposed 10-Day Transfer Area
- Figure 4c: Site Plan with Traffic Flow
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- Figure 4e: Secondary Containment Details
- Figure 4f: Evacuation Routes and Rally Points

Figure 5: DOT Segregation Table

Figure 6: Wind Rose

10-Day Hazardous Waste Transfer Permit Application

Figure 1: Topographic Maps

Triumvirate Environmental (Baltimore), LLC
1500 Carbon Avenue
Baltimore, MD 21226

EPA ID No. MDD093002384

Application Date: June 9, 2023

Figure 1a: Topographic Map with 1-Mile Radius (2,000 ft scale)

Site location denoted by blue pin. Image shown is an excerpt from the combined USGS Curtis Bay Quadrangle and USGS Baltimore East Quadrangle maps dated 2019 from https://ngmdb.usgs.gov/topoview/viewer/#14/39.2423/-76.5850. The full USGS map for each quadrangle is provided below.

USGS Curtis Bay Quadrangle (2019)

USGS Baltimore East Quadrangle (2019)

U.S. DEPARTMENT OF THE INTERIOR
U.S. GEOLOGICAL SURVEY

The National Map US Topo

BALTIMORE EAST QUADRANGLE
MARYLAND
7.5-MINUTE SERIES

Site Location

Produced by the United States Geological Survey
North American Datum of 1983 (NAD83)
World Geodetic System of 1984 (WGS84). Projection and 1 000-meter grid:Universal Transverse Mercator, Zone 18S
This map is not a legal document. Boundaries may be generalized for this map scale. Private lands within government reservations may not be shown. Obtain permission before entering private lands.

Imagery.....NAIP, July 2015 - September 2015
Roads.....U.S. Census Bureau, 2016
Names.....GNIS, 1979 - 2019
Hydrography.....National Hydrography Dataset, 2004 - 2018
Contours.....National Elevation Dataset, 1999 - 2016
Boundaries.....Multiple sources; see metadata file 2017 - 2018
Wetlands.....FWS National Wetlands Inventory 2013

UTM GRID AND 2018 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

SCALE 1:24 000

CONTOUR INTERVAL 20 FEET
NORTH AMERICAN VERTICAL DATUM OF 1988

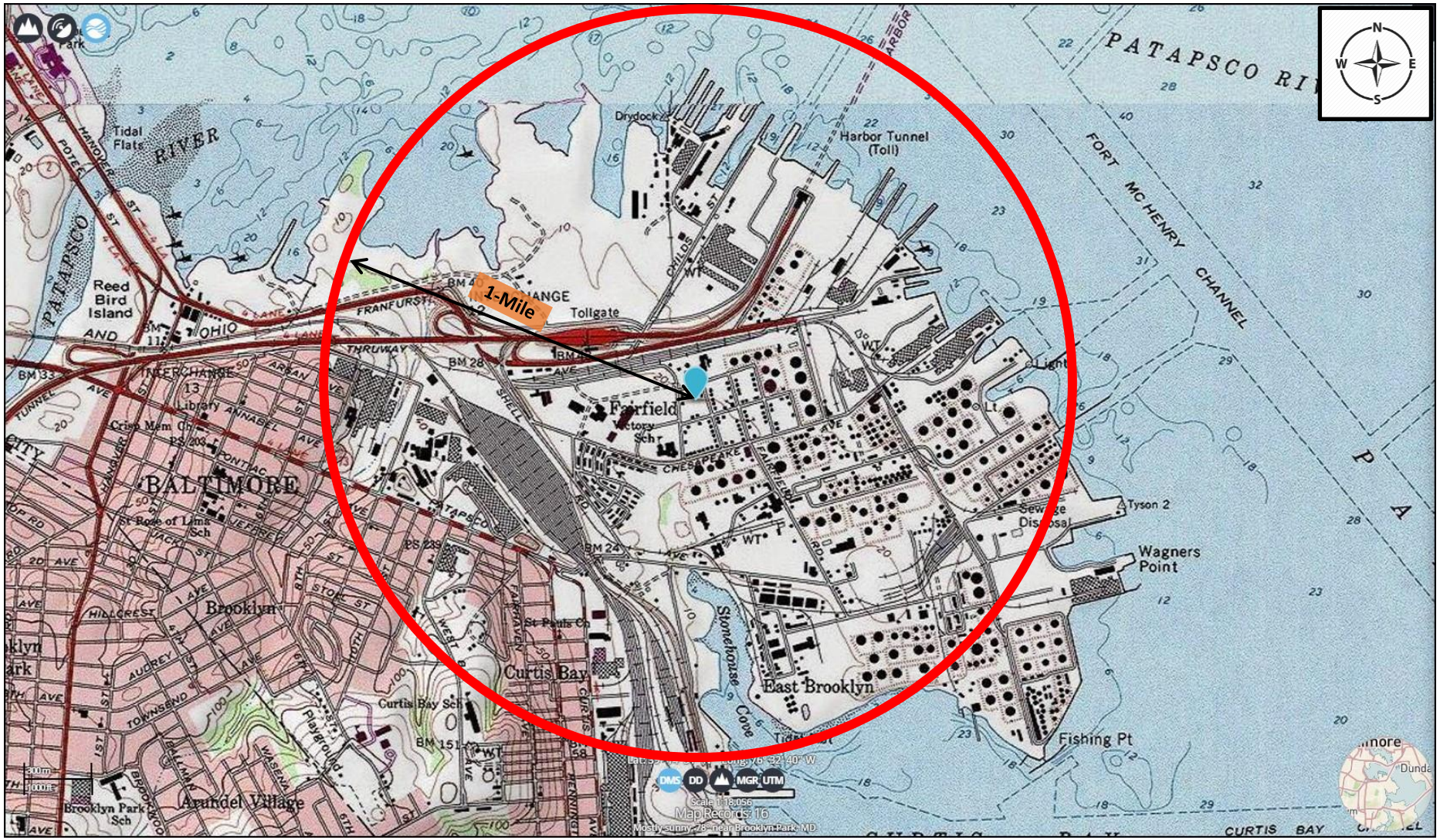
This map was produced to conform with the National Geospatial Program US Topo Product Standard, 2011. A metadata file associated with this product is draft version 0.6.18

ROAD CLASSIFICATION
Expressway, Secondary Hwy, Ramp, Local Connector, Local Road, 4WD
Interstate Route, US Route, State Route

1 Cockeysville
2 Towson
3 White Marsh
4 Baltimore West
5 Middle River
6 Relay
7 Curtis Bay
8 Sparrows Point

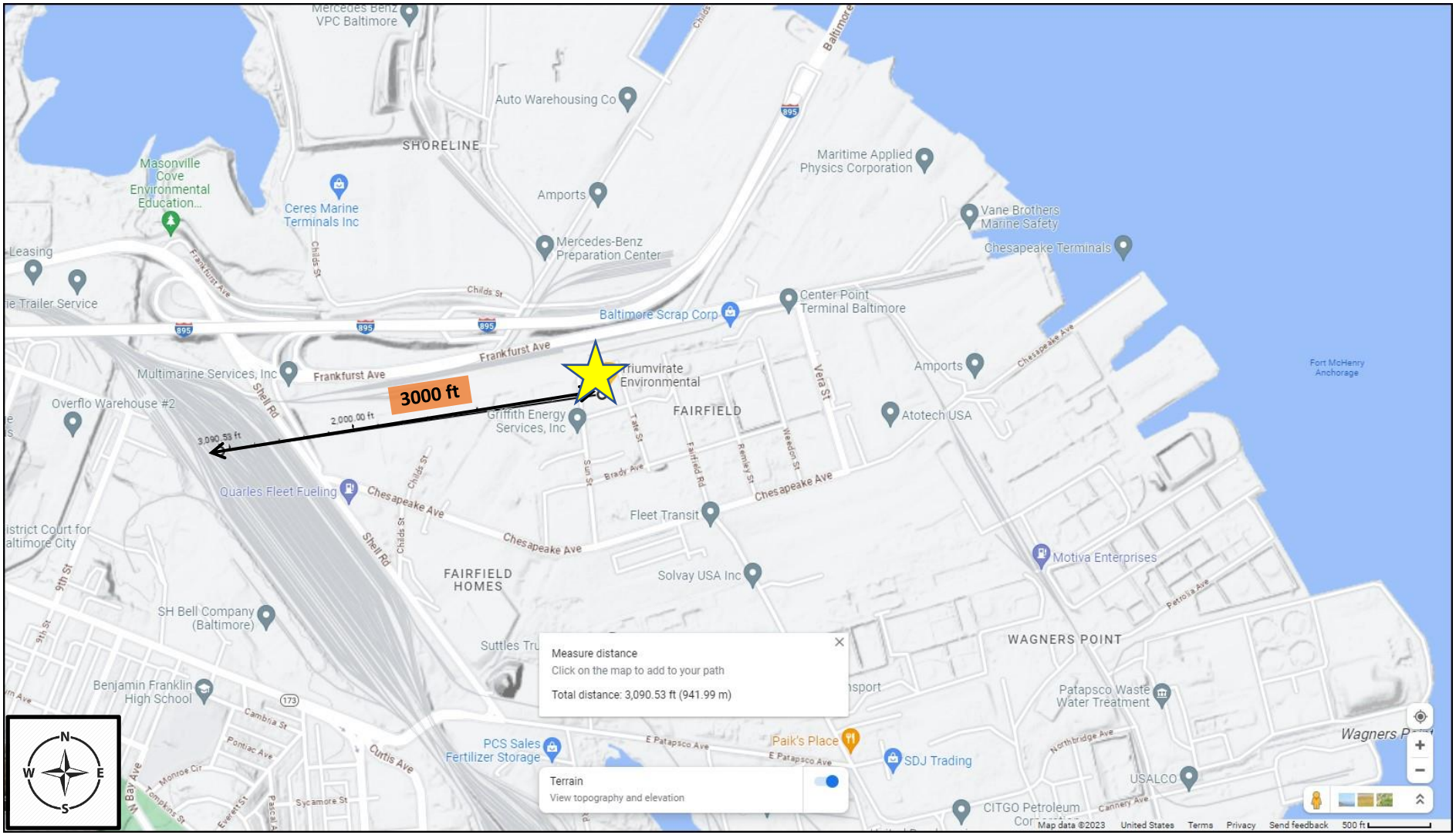
BALTIMORE EAST, MD
2019

Figure 1b: Topographic Map with 1-Mile Radius (1,000 ft scale)



Site location denoted by blue pin. Image shown is an excerpt from the combined USGS Curtis Bay Quadrangle and USGS Baltimore East Quadrangle maps dated 2019 from https://ngmdb.usgs.gov/topoview/viewer/#14/39.2423/-76.5850. The full USGS map for each quadrangle is provided below.

Figure 1c: Google Terrain Map



10-Day Hazardous Waste Transfer Permit Application

Figure 2: Property Boundary and Land Use Map

Triumvirate Environmental (Baltimore), LLC
1500 Carbon Avenue
Baltimore, MD 21226

EPA ID No. MDD093002384

Application Date: June 9, 2023

Figure 2a: Property Boundary Map

Figure 2b: Land Use Map

10-Day Hazardous Waste Transfer Permit Application

Figure 3: Flood Zone Map

Triumvirate Environmental (Baltimore), LLC
1500 Carbon Avenue
Baltimore, MD 21226

EPA ID No. MDD093002384

Application Date: June 9, 2023

National Flood Hazard Layer FIRMette

FEMA

76°35'14"W 39°14'37"N

76°34'37"W 39°14'9"N

0 250 500 1,000 1,500 2,000 Feet

1:6,000

Basemap: USGS National Map: Orthoimagery: Data refreshed October, 2020

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, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile *Zone X*
- 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 D*

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

OTHER FEATURES
- 20.2 Cross Sections with 1% Annual Chance
- 17.5 Water Surface Elevation
- Coastal Transect
- 513 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 5/23/2023 at 3:48 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.

Section Divide

Figure 4: Site Plans

- Figure 4a: Current Site Plan with ER Equipment
- Figure 4b: Site Plan with Proposed 10-Day Transfer Area
- Figure 4c: Site Plan with Traffic Flow
- Figure 4d: Emergency Response Equipment Locations
- Figure 4e: Secondary Containment Details
- Figure 4f: Evacuation Routes and Rally Points

10-Day Hazardous Waste Transfer Permit Application

Figure 4: Site Plans

Triumvirate Environmental (Baltimore), LLC
1500 Carbon Avenue
Baltimore, MD 21226

EPA ID No. MDD093002384

Initial Application Date (Rev 0): June 9, 2023
Revision #1: March 21, 2024

Figure 4a: Current Site Plan with ER Equipment

* The hazardous waste storage area noted in the southeast corner of the warehouse is for hazardous waste generated by Triumvirate.

Figure 4b: Site Plan with Proposed 10-Day Transfer Area

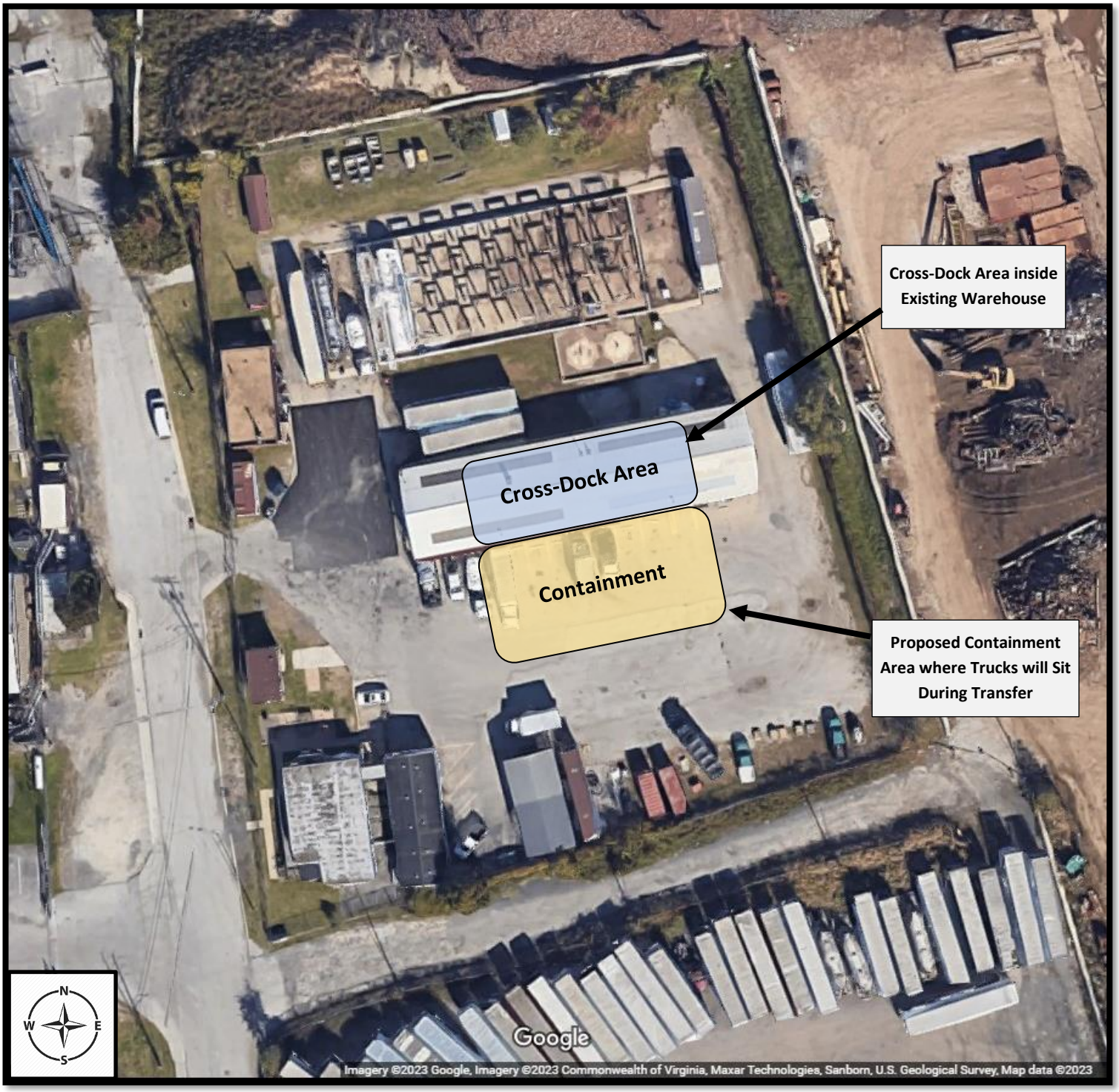


Figure 4c: Traffic Flow

Figure 4d: Emergency Response Equipment Locations

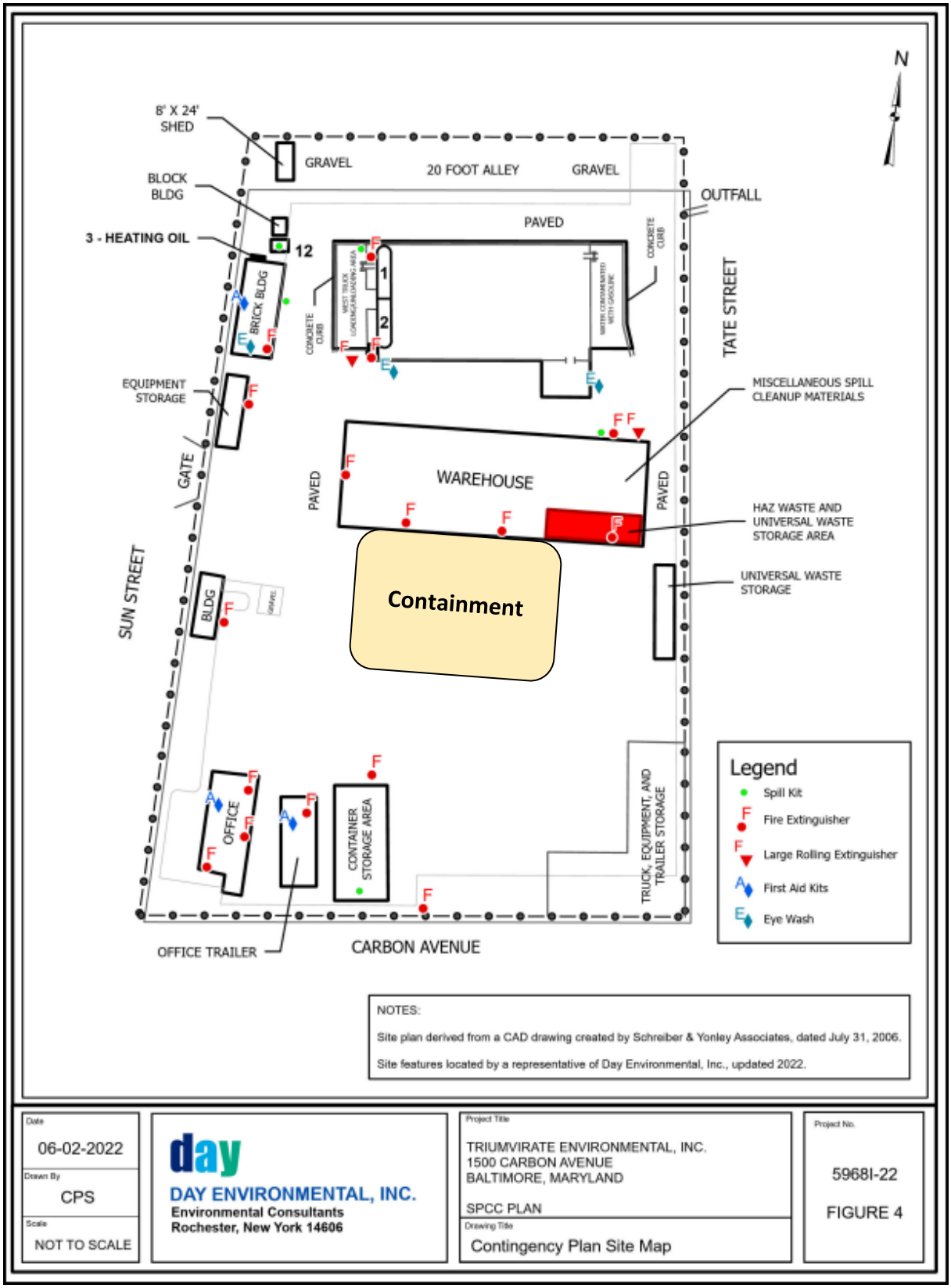


Figure 4e: Secondary Containment Details

The project would include the installation of 7 additional dock doors to give 8 total docks where transfer can occur. The containment would encompass all docks as shown in the picture. The containment pad will have a minimum 2 inch curb.

Figure 4f: Evacuation Routes and Rally Points

Figure 5: DOT's Segregation Table for Hazardous Materials

Class or Division		Notes	1.1 , 1.2	1.3	1.4	1.5	1.6	2.1	2.2	2.3 Gas Zone A	2.3 Gas Zone B	3	4.1	4.2	4.3	5.1	5.2	6.1 Liquids PG I Zone A	7	8 Liquids Only
Explosives	1.1 & 1.2	A	*	*	*	*	*	X	X	X	X	X	X	X	X	X	X	X	X	X
Explosives	1.3		*	*	*	*	*	X		X	X	X		X	X	X	X	X		X
Explosives	1.4		*	*	*	*	*	O		O	O	O		O				O		O
Very insensitive explosives	1.5	A	*	*	*	*	*	X	X	X	X	X	X	X	X	X	X	X	X	X
Extremely insensitive explosives	1.6		*	*	*	*	*													
Flammable gases	2.1		X	X	O	X				X	O							O	O	
Non-toxic, non-flammable gases	2.2		X			X														
Poisonous gas Zone A	2.3		X	X	O	X		X				X	X	X	X	X	X			X
Poisonous gas Zone B	2.3		X	X	O	X		O				O	O	O	O	O	O			O
Flammable liquids	3		X	X	O	X				X	O					O		X		
Flammable solids	4.1		X			X				X	O							X		O
Spontaneously combustible materials	4.2		X	X	O	X				X	O							X		X
Dangerous when wet materials	4.3		X	X		X				X	O							X		O
Oxidizers	5.1	A	X	X		X				X	O	O						X		O
Organic peroxides	5.2		X	X		X				X	O							X		O
Poisonous liquids PG I Zone A	6.1		X	X	O	X		O				X	X	X	X	X	X			X
Radioactive materials	7		X			X		O												
Corrosive liquids	8		X	X	O	X				X	O		O	X	O	O	O	X		

(1) The absence of any hazard class or division or a blank space in the table indicates that no restrictions apply.
(2) The letter "X" in the table indicates that these materials may not be loaded, transported, or stored together in the same transport vehicle or storage facility during the course of transportation.
(3) The letter "O" in the table indicates that these materials may not be loaded, transported, or stored together in the same transport vehicle or storage facility during the course of transportation unless separated in a manner that, in the event of leakage from packages under conditions normally incident to transportation, commingling of hazardous materials would not occur. Notwithstanding the methods of separation employed, Class 8 (corrosive) liquids may not be loaded above or adjacent to Class 4 (flammable) or Class 5 (oxidizing) materials; except that shippers may load truckload shipments of such materials together when it is known that the mixture of contents would not cause a fire or a dangerous evolution of heat or gas.
(4) The "*" in the table indicates that segregation among different Class 1 (explosive) materials is governed by the compatibility table in paragraph (f) of this section.
(5) The note "A" in the second column of the table means that, notwithstanding the requirements of the letter "X", ammonium nitrate (UN 1942) and ammonium nitrate fertilizer may be loaded or stored with Division 1.1 (explosive) or Division 1.5 materials.
(6) When the §172.101 table or §172.402 of this subchapter requires a package to bear a subsidiary hazard label, segregation appropriate to the subsidiary hazard must be applied when that segregation is more restrictive than that required by the primary hazard. However, hazardous materials of the same class may be stowed together without regard to segregation required for any secondary hazard if the materials are not capable of reacting dangerously with each other and causing combustion or dangerous evolution of heat, evolution of flammable, poisonous, or asphyxiant gases, or formation of corrosive or unstable materials.
(f) Class 1 (explosive) materials shall not be loaded, transported, or stored together, except as provided in this section, and in accordance with the following table:

10-Day Hazardous Waste Transfer Permit Application

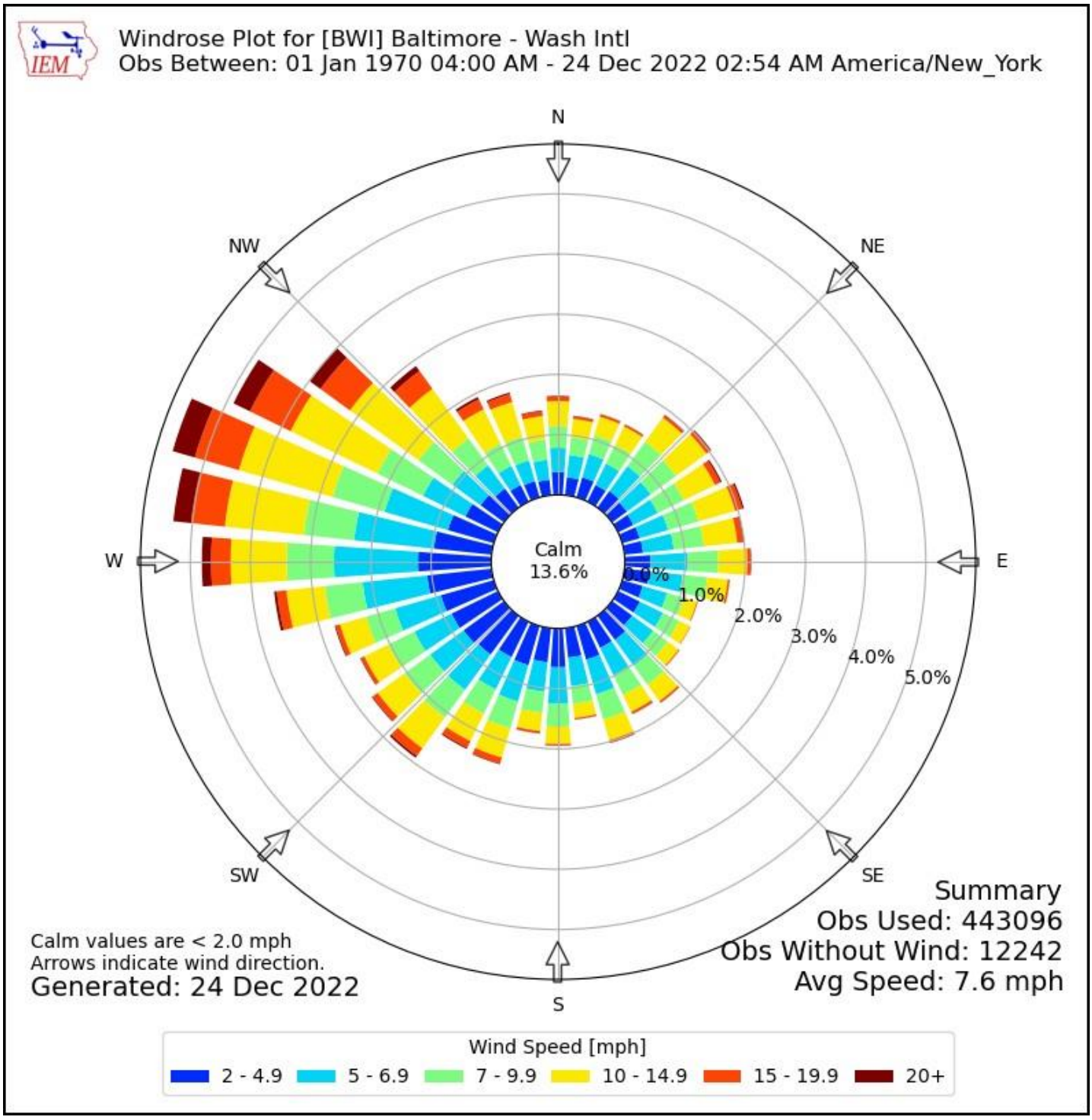
Figure 6: Wind Rose

Triumvirate Environmental (Baltimore), LLC
1500 Carbon Avenue
Baltimore, MD 21226

EPA ID No. MDD093002384

Application Date: June 9, 2023

Wind Rose Plot



Source: NOAA climate.gov link to Iowa Environmental Mesonet
https://mesonet.agron.iastate.edu/sites/windrose.phtml?station=MCO&network=FL_ASOS

Exhibits

Exhibit 1: List of Corporate Officers

Exhibit 2: Site Photographs

Exhibit 3: Pre-Application Public Meeting Records

Exhibit 4: Waste Profile Example

Exhibit 5: Daily Inspection Log

Exhibit 6: Weekly Inspection Log

Exhibit 7: Job Descriptions

Exhibit 8: DOT Special Permits

Exhibit 9: Closure Cost Estimate

Exhibit 1: List of Corporate Officers

CEO (Chief Executive Officer): John F McQuillan JR - 200 Inner Belt Rd, c/o Triumvirate Environmental, Inc., SOMERVILLE, MA, 02143, USA - - Date of Taking Office:

Director: John F McQuillan JR - 200 Inner Belt Rd, c/o Triumvirate Environmental, Inc., SOMERVILLE, MA, 02143, USA - - Date of Taking Office:

Incorporator: John F McQuillan JR - 200 Inner Belt Rd, c/o Triumvirate Environmental, Inc., SOMERVILLE, MA, 02143, USA - - Date of Taking Office:

Officer: Don Siegel - 200 Inner Belt Rd, c/o Triumvirate Environmental, Inc., SOMERVILLE, MA, 02143, USA - - Date of Taking Office:

Officer: Doug Youngen - 200 Inner Belt Rd, c/o Triumvirate Environmental, Inc., SOMERVILLE, MA, 02143, USA - - Date of Taking Office:

Officer: Emily Duquette - 200 Inner Belt Rd, c/o Triumvirate Environmental, Inc., SOMERVILLE, MA, 02143, USA - - Date of Taking Office:

Officer: Tim Mooney - 200 Inner Belt Rd, c/o Triumvirate Environmental, Inc., SOMERVILLE, MA, 02143, USA - - Date of Taking Office:

Officer: Tom Aicardi - 200 Inner Belt Rd, c/o Triumvirate Environmental, Inc., SOMERVILLE, MA, 02143, USA - - Date of Taking Office:

President: Doug Youngen - 200 Inner Belt Rd, c/o Triumvirate Environmental, Inc., SOMERVILLE, MA, 02143, USA - - Date of Taking Office:

Secretary: John F McQuillan JR - 200 Inner Belt Rd, c/o Triumvirate Environmental, Inc., SOMERVILLE, MA, 02143, USA - - Date of Taking Office:

Treasurer: John F McQuillan JR - 200 Inner Belt Rd, c/o Triumvirate Environmental, Inc., SOMERVILLE, MA, 02143, USA - - Date of Taking Office:

Vice-President: Tom Aicardi - 200 Inner Belt Rd, c/o Triumvirate Environmental, Inc., SOMERVILLE, MA, 02143, USA - - Date of Taking Office:

Exhibit 2: Site Photographs

Triumvirate is providing photographs that delineate all existing structures and the proposed location of the 10-day in-transit transfer area.

Photograph Locations

Photograph #1: Proposed 10-Day Transfer Area at Warehouse (Containment will be constructed after permit approval)

Photograph #2: Cross-Dock Transfer Area inside Warehouse

Photograph #3: : Cross-Dock Transfer Area inside Warehouse

Photograph #4: Entrance/Exit to the Facility

10-Day Hazardous Waste Transfer Permit Application

Exhibit 3: Pre-Application Meeting Records

Triumvirate Environmental (Baltimore), LLC
1500 Carbon Avenue
Baltimore, MD 21226

EPA ID No. MDD093002384

Application Date: June 9, 2023

Figure 1-7: Preapplication Public Meeting Documents

Meeting Summary as Advertised in The Baltimore Daily Record on Monday, January 30th, 2023
COMAR 26.13.07.02(39)(a)

NOTICE

Triumvirate Environmental Baltimore LLC (TEI), a full-service environmental firm with offices in the Curtis Bay section of Baltimore, MD, is seeking a permit to operate a controlled hazardous substances (CHS) facility as defined in COMARm26.13.07, at its 1500 Carbon Ave location. The proposed operation will allow TEI to transfer closed containers of hazardous materials between permitted trucks and trailers, within our fenced parking area, during our normal course of business. All containers will be packaged in accordance with Department of Transportation (USDOT) regulations and remain onsite in locked and secured trailers for no more than 10 days.

TEI is holding a pre-application public meeting to discuss the proposed operation. Community members in attendance will receive information about the management activities that will take place at the property. TEI will document questions from the attendees. Attendees will have also had an opportunity to be included on a mailing list to receive information related to the application.

The meeting is open to the general public and will be held at the La Quinta Inn and Suites, 6323 Ritchie Hwy, Glen Burnie, MD 21061 on Monday, January 30th, 2023 from 11:00 a.m. to 12:00 p.m. Individuals who need special accommodations to be able to participate in the meeting are encouraged to contact Bryant Craig at 1500 Carbon Ave, Baltimore, MD 21226 and by phone (410) 636-3700, ext. 2210 at least 72 hours before the meeting. Any questions concerning this notice may also be addressed to John Giovanucci at (410) 636-3700, ext. 2218.

Figure 1-7: Preapplication Public Meeting Documents

List of Persons/Addresses Who Attended the Meeting
COMAR 26.13.07.02(39)(b)

Name (Please Print)	Address (optional)
Bryant Craig	1500 Carbon Ave, Baltimore, Md 21226
BRIAN SCHAFLE	REDACTED
01/30/2023	

TRIUMVIRATE
ENVIRONMENTAL

Figure 1-7: Preapplication Public Meeting Documents

Copies of Any Written Comments or Materials Submitted at the Meeting
COMAR 26.13.07.02(39)(c)

No comments were made

ON-SITE FOR MEETING AT 10:30 AM; (2) TEI EMPLOYEES PRESENT;
MEETING START TIME AT 10:45 AM;
MEETING END TIME AT 12:15 PM;
NO ATTENDANCE, NO CONTEST FROM PUBLIC OR
OTHER RELATED INTEREST GROUPS PRESENT AT THIS
PUBLIC MEETING; BTA 01/30/2023 @ 12:30PM

10-Day Hazardous Waste Transfer Permit Application

Exhibit 4: Waste Profile Example

Triumvirate Environmental (Baltimore), LLC
1500 Carbon Avenue
Baltimore, MD 21226

EPA ID No. MDD093002384

Application Date: June 9, 2023

WASTE PROFILE SHEET

TRIUMVIRATE ENVIRONMENTAL

Triumvirate Environmental (Florida), Inc.
10100 Rocket Boulevard
Orlando, FL 32824
Phone: (407) 859-4441 Fax: (407) 855-2812

Approval #: example

A. Generator Information:			**Customer Information:**		
Generator Name: Triumvirate Environmental Services, Inc.			Customer Name: Triumvirate Environmental Services, Inc.		
Mail Address: 10100 Rocket Blvd.			Address: 10100 Rocket Blvd.		
City: Orlando	State: FL	Zip: 32824	City: Orlando	State: FL	Zip: 32824
Contact: Pat Malloy	Title:		Contact:	Title:	
Site Phone:	EPA ID: FLD980559728		Customer Phone: (407) 859-4441	Sic Code:	
Site Address: 10100 Rocket Blvd. Orlando, FL 32824			Customer Fax:		

B. COMMON NAME OF WASTE: example profile — **MSDS / Analytical (Y/ N)** SAMPLE

Process generating waste: Equipment Change Out — Process Code: OAERCAB

Shipment Method: Drum (size): /(type): Bulk: Quantity: 0 /mo. ☐qtr. ☐yr. ☐ one time ☐

C. Physical Properties: Color: Total Halogens (%)0 Odor: none ☐ mild ☐ strong ☐

Liquids (%) Solids (%) Sludge (%) Powder (%) Debris: Specific Gravity:

PH: BTU/Lb: ☐ <5000 ☐ <10,000 ☐ >10,000 Flash Point (f): ☐ <100 ☐<140 ☐ <200 ☐ >200

D. Waste Composition (list all haz & non-haz components)					**G. Metals: None** ☒ **TCLP** ☐ **TOTAL** ☐			
ALKALINE BATTERIES	100	-	100	%	D004 Arsenic 5mg/l:	0	D005 Barium 100mg/l:	0
		-		%	D006 Cadmium 1mg/l:	0	D007 Chromium 5mg/l:	0
		-		%	D008 Lead 5mg/l:	0	D009 Mercury 0.2 mg/l:	0
		-		%	D010 Selenium 1mg/l:	0	D011 Silver 5mg/l:	0
		-		%	Copper:	0	Nickel:	0
		-		%	Zinc:	0		

E. Hazardous Properties:				**H. Other Compounds: TCLP** ☐ **Total** ☐			
None ☒	Water Reactive ☐	Shock Sensitive ☐	Radioactive ☐	D012 Endrin ☐		D029 Dichloroethlene ☐	
Dioxins ☐	Benzene Neshap ☐	Air Sensitive ☐	Pyrophoric ☐	D013 Lindane ☐		D030 2,4-Dinitrotoluene ☐	
Explosive ☐	Etiological ☐	Polymerizable ☐	Pathogen ☐	D014 Methoxychlor ☐		D031 Heptachlor/epoxide ☐	
Biological ☐	Pesticide/Herbicide/Insecticide ☐			D015 Toxaphene ☐		D032 Hexachlorobenzene ☐	
Special Handling/Compatibility Concerns:				D016 2,4-Dichlorophenoxyacetic Acid ☐			
				D017 2,4,5 TP (Silvex) ☐		D033 Hexachlorobutadiene ☐	
Cyanides ☐	Sulfides ☐	Amines ☐	PCB's ☐ Phenols ☐	D018 Benzene ☐		D034 Hexachhloroethane ☐	
F. DOT Shipping Name: Batteries, dry, sealed, n.o.s.				D019 Carbon Tetrachloride ☐		D035 Methyl Ethyl Ketone ☐	
				D020 Chlorodane ☐		D036 Nitrobenzene ☐	
Additional Description:				D021 Chlorobenzene ☐		D037 Pentachlorophenol ☐	
Hazard Class: UN/NA: Packing Group:				D022 Chloroform ☐		D038 Pyridine ☐	
EPA Code:				D023 o-Cresol ☐		D039 Tetrachloroethylene ☐	
State Code:				D024 m-Cresol ☐		D040 Trichloroethylene ☐	
Is this material a Hazardous Waste under 40CFR 261.3 ☐Yes ☒ No				D025 p-Cresol ☐		D041 2,4,5-Trichlorophenol ☐	
Is this a Hazardous Substance/Marine Pollutant per 49 CFR (DOT) ☐Yes ☒ No				D027 1,4-Dichlorobenzene ☐		D042 2,4,6- Trichlorophenol ☐	
Form Code: WNA Source Code: GNA Subpart CC (voc>500ppm):				D028 1,2 Dichloroethane ☐		D043 Vinyl Chloride ☐	
				Notes:			

Generator Certification: I hereby certify that the waste identified or described on this waste profile conforms with the identifications or descriptions provided, and with analytical data or other specifications provided to the TSDF. To the extent the waste does not conform, the Generator agrees to indemnify Triumvirate Environmental (Florida), Inc. from all liability and damages arising therefrom. No deliberate or willful omissions of composition or properties exist and that all known or suspected hazards have been disclosed. I also certify that the obtained sample is representative of the waste material described above and give this TSDF permission and consent to make amendments and corrections.

Name:	**Title:**
Signature:	**Date:**

Facility Certification:

As required by 40 CFR 264.12(b) of US EPA Hazardous Waste Regulations, Triumvirate Environmental (Florida), Inc. certifies that they possess the proper current licenses required by the US Environmental Protection Agency and the Florida Department of Environmental Protection to accept and store the waste listed above. The generator will be notified in writing within seven days of any changes in license status affecting the ability of Triumvirate Environmental (Florida), Inc. to accept the above waste.

(For Triumvirate Envoronmental Use Only)

Authorized Signature:	**Printed Name:**	**Date:**	**Title:**
Off Site Codes:	**Disposal Restrictions:**		

Section Divide

Exhibit 5:

Daily Inspection Log

Exhibit 5: Transfer Area Daily Inspection Checklist

Inspected By:		**Date:**		**Time:**	

Inspection Item	**Inspection Detail**	**Condition Acceptable? Y / N**
Parked Vehicles	Vehicle cabs and cargo areas are secured from unauthorized entry if no transfers are taking place at the time of inspection	
	Vehicle cargo areas are equipment 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 each vehicle at the time of inspection	
	All vehicles are properly marked and placarded according to DOT and MDE regulations	
	Truck's paperwork is in the truck.	
Area Subject to Spills	The dock surface transfer area is clean and free of obstructions/trip hazards	
	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 good condition (i.e. not-leaking and free of excessive rust or corrosion)	
	All waste is held in appropriate DOT-spec containers	
	All containers are properly marked, labeled and segregated according to DOT guidelines and TEI special permits	
Waste Volume	The total volume of waste in the transfer area does not exceed the permitted capacity threshold (44,000 gallons / 800 x 55-gallon drum equivalents)	
Gates/Entry Doors	Gates/doors Locked when employees are not present	
	Padlocks are functional	
	Gates/doors are intact (no signs defects or deterioration)	
	No signs of forced entry	
	Evacuation routes throughout the property are unobstructed	

Observations and Notes Relevant to Remedial or Corrective Actions:

Exhibit 6: Transfer Area Weekly Inspection Checklist

Inspected By:		**Date:**		**Time:**	

Inspection Item	**Inspection Detail**	**Condition Acceptable? Y / N**
Perimeter Fence	Fence is intact (no signs of defects or deterioration)	
	No signs of forced entry	
Containment	The secondary containment area is in good condition and free of cracks or gaps	
	The secondary containment area is clean and contains no liquid	
Signage	Signs that are visible from a distance of 25 feet are posted at the entrances to the property and on each side of the perimeter fence which read: ***"Danger – Unauthorized Personnel Keep Out"*** *a*nd **"*No Smoking"***	
Emergency Equipment	Verify that the following pieces of emergency equipment are located at the property and easily accessible in the event of an emergency:	
	1 – Fire extinguishers (fully charged and inspected) at the transfer area	
	1 – bale of sorbents	
	1 – 16 lb bags of speedi-dry	
	1 – Spill booms	
	1 – Bag of acid neutralizer (40-50 lb)	
	1 – Bags of caustic neutralizer (40-50 lb)	
	1 – Box of Tyvek suits	
	1 – SCBAs	
	1 – Boxes of gloves	
	1 – Pairs of rubber boots	
	1 – Overpack drums	
	1 – Airhorn (functionality confirmed weekly)	

Observations and Notes Relevant to Remedial or Corrective Actions:

10-Day Hazardous Waste Transfer Permit Application

Exhibit 7: Job Descriptions

Triumvirate Environmental (Baltimore), LLC
1500 Carbon Avenue
Baltimore, MD 21226

EPA ID No. MDD093002384

Application Date: June 9, 2023

Exhibit 7: Job Descriptions

TITLE: Facility Manager	
Basic Function	Manage a safe, efficient and profitable CHS transfer operation with direct responsibilities for, training, safety, site operations, transportation, maintenance, permitting, EPA and state relations and public community relations.
Education	Bachelor's Degree in Chemistry, Environmental Studies, or related science degree
Requisite Skills	1. Minimum two years practical experience in hazardous waste management or chemical industry operations. 2. Minimum one year 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.
Specific Responsibilities	1. Directs operations activities to achieve budgeted goals. 2. Directs and organizes activities of personnel and reviews their performance. 3. Responsible for permitting and licensing. 4. Sets and administers company policies. 5. Ensures compliance with environmental regulations and with internal quality assurance procedures. 6. Works to ensure the safety of employees involved in all aspects of the transfer operation 7. Works with all TEI staff members to ensure that the shipments are properly reviewed account to waste qualification process described in the CHS permit. 8. Maintains relationships with regulatory agencies. 9. Maintains relationships with TSDFs. 10. Maintains relationships with permitted hauling companies 11. Directs work projects for facility improvement and maintenance. 12. Maintains good public relations with the local community. 13. Maintains high enthusiasm and standards for safety and quality control. 14. Performs physical, operational transfer-related tasks as needed.

TITLE: Compliance Specialist	
Basic Function	Assist the Facility manager to ensure that the facility is operated the safe and compliant manner. The compliance assistant may complete inspection duties and other operational tasks as needed.
Education	The Compliance Assistant will have, at a minimum, a High School diploma or GED. The ability to read, write and understand English along with basic computer skills.
Requisite Skills	1. Minimum 1 year practical experience in hazardous waste management or chemical industry operations.

TITLE: Compliance Specialist	
	2. Excellent verbal and written communication skills. 3. Excellent organizational skills. 4. Detail-oriented (i.e. completeness of federal, state and municipal forms, letters and other communications) with good filing skills. 5. Well-versed in the regulatory features of the CHS permit and the ability to comprehend all aspects of the transfer operation. 6. Ability to relate information in a clear and concise manner. 7. Ability to anticipate needs of Triumvirate as they relate to compliance with federal, state and municipal regulations.
Specific Responsibilities	Assists the Facility Manager with the following responsibilities: 1. Assist Facility Manager in review of incoming manifests to ensure they are complete, correct and in compliance with present regulations. 2. Conducts trainings for TEI operations and administrative staff members and ensures that TEI employees have the knowledge to perform applicable transfer-related tasks. 3. Works with all TEI staff members to ensure that the shipments are properly reviewed according to the waste qualification process described in the CHS permit. 4. Reviews waste description of incoming shipments to determine whether material(s) recorded on manifest were correctly recorded by customer. 5. Advise Facility Manager, Technical service and/or customers (verbally) regarding resolution of manifest discrepancies and disposition of material and other corrective actions that may be necessary. 6. Prepare outgoing manifests for waste shipments. 7. Maintain the truck-to truck transfer log. 8. Assist with paperwork and all other facility administration. 9. Performs vehicle, equipment and property inspection duties described in the CHS permit. 10. Performs physical, operational transfer-related tasks as needed.

TITLE: Technical Service Representative (TSR)	
Basic Function	Act as an administrative liaison between waste generators (customers) and the facility/operations staff under routine circumstances.
Education	The Technical Service Representative will have, at a minimum, a High School diploma or GED. The ability to read, write and understand English along with basic computer skills.
Requisite Skills	1. Capable of communicating effectively with customers over the phone and email 2. Sufficiently competent to operate a computer and utilize TEI's business software 3. Detail-oriented (i.e. completeness of federal, state and municipal forms, letters and other communications) with good filing skills. 4. Ability to complete tasks in a timely manner and to recognize the need to meet specific

TITLE: Technical Service Representative (TSR)	
	deadlines required by law and Triumvirate. 5. Ability to relate information in a clear and concise manner. 6. Ability to understand the operational limitations and regulatory restrictions of the CHS facility
Specific Responsibilities	1. Receives orders from waste generators to perform waste pick-up services 2. Prepares quotes and proposals for waste removal services 3. Works with operations/facility managers to ensure that waste pickups from generators' sites are staffed and scheduled appropriately. 4. Primarily responsible for communicating transfer logistics and shipping paperwork requirements to waste generators 5. Prepares shipping papers on behalf of waste-generators upon request 6. Prepares and sends invoices to TEI's customers

TITLE: Operations Manager	
Basic Function	Manages operations staff members (drivers, technicians and specialists) who perform waste-removal projects at customers' sites, transport waste on permitted vehicles and conduct waste transfer activities at the CHS facility. Works with the Facility Manager to ensure that waste is handled, transported and transferred according to the CHS Facility permit.
Education	An Operations Manager will have, at a minimum, a High School diploma or GED. The ability to read, write and understand English along with basic computer skills.
Requisite Skills	1. Minimum one year 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. 6. Physically capable of moving waste containers by means of drum dollies, pallet jacks or other mechanical devices.
Specific Responsibilities	Cooperates with Technical Service Representatives to accomplish the following tasks: 1. Maintain a daily dispatching schedule and staff customers' waste-removal projects effectively. Cooperates with the Facility Manager to accomplish the following tasks: 1. Ensure that operations staff members package waste correctly and evaluate the condition of waste containers prior to transport and during transfer operations at the CHS facility. 2. Ensure that operations staff members collect appropriate shipping papers from customers during waste –removal projects.

TITLE: Operations Manager	
	3. Ensure that operations staff members attend trainings. 4. Ensure that operations staff members perform waste transfer activities at the CHS facility in a safe and compliant manner. 5. Ensure that corrective actions are developed and executed when operational errors occur. 6. Coordinate and schedule shipments of waste from the CHS facility following transfer activities.

TITLE: Operations Staff Member (drivers, technicians, and specialists)	
Basic Function	Performs physical tasks associated with waste-removal projects including packaging, loading/unloading vehicles, transporting and transferring waste to and from the CHS Facility
Education	An Operations Staff Member must have the ability to read, write, understand English, and 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.
Specific Responsibilities	Follows the instructions of the TEI 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.

Exhibit 8: List of DOT Special Permits

Triumvirate Environmental, Inc.

DOT SP	Purpose	Expiry	Comments	Current Revision
8445	Pharm	11/30/2026	Maintaining party status	16th
8451	Pyrotechnic	11/30/2026	Maintaining party status	41st
09168	Berlin Packing, Bridgeville, PA (formerly All-Pak Inc.)	6/30/2023	Third Party / Use of packaging	18th
11248	HAZMATPAC, Inc.	2/28/2026	Third Party / Use of packaging	16th
11924	Packgen, Inc. – Auburn, ME	9/30/2026	Third Party / Use for facility packaging	15th
12102	Explosives, wetted	8/31/2024	Maintaining party status	21st
12998	Lab Move	7/31/2025	Standard permit (in vehicle permit books)	4th
15862	Lab pack 6.1, PG1	9/30/2024	Maintaining party status	1st
16279	Ebola	9/30/2025	Maintaining party status	3rd
16532	Alternative packaging certain damaged or defective batteries.	4/30/2026	Standard permit (in vehicle permit books)	2nd

Triumvirate Environmental Services, Inc.

DOT SP	Purpose	Expiry	Comments	Current Revision
8445	Pharm	5/31/2025	Maintaining party status	16th
8451	Pyrotechnic	5/31/2025	Maintaining party status	41st
09168	Berlin Packing, Bridgeville, PA (formerly All-Pak Inc.)	6/30/2023	Third Party / Use of packaging	18th
11248	HAZMATPAC, Inc.	2/28/2026	Third Party / Use of packaging	16th
11924	Packgen, Inc. – Auburn, ME	9/30/2026	Third Party / Use for facility packaging	15th
12102	Explosives, wetted	5/31/2025	Maintaining party status	20th
12998	Lab Move	2/28/2026	Standard permit (in vehicle permit books)	4th
15862	Lab pack 6.1, PG1	5/31/2025	Maintaining party status	1st
16532	Alternative packaging certain damaged or defective batteries.	5/31/2025	Standard permit (in vehicle permit books)	2nd

Permits can be downloaded at http://phmsa.dot.gov/hazmat/regs/sp-a/special-permits/search

Section Divide

Exhibit 9:

Closure Cost Estimate

Exhibit 9: Closure Cost Estimate

Closure cost summaries for the hazardous waste container areas are based on initial detailed analysis provided by independent professional engineers. The

- Inventory removal and disposal
- Decontamination
- Disposal of any rinse water generated during closure
- Collection and analysis of rinse water
- Close transfer pad
- Sampling and analytical testing
- Professional Engineer Certification
- Contingencies
- Administrative

Disposal	Units	Container Size	Unit Cost	Total Cost
Bulk Acids	120	55 gal	$ 101.00	$ 12,120.00
Bulk Flammables	120	55 gal	$ 55.46	$ 6,655.20
Bulk TSCA (PCB Liquids)	40	55 gal	$ 330.00	$ 13,200.00
Bulk RCRA	120	55 gal	$ 101.00	$ 12,120.00
Bulk Alkaline/Caustics/Cyanides	40	55 gal	$ 101.00	$ 4,040.00
LP Water Reactive/Pyrophoric	20	55 gal	$ 304.00	$ 6,080.00
Bulk Non-Reg or RCRA Solids or PCB Solids	20	cubic yard	$ 330.00	$ 6,600.00
Bulk Non-Regulated (inner & outer storage)	100	55 gal	$ 91.71	$ 9,171.00
LP Acids	40	55 gal	$ 165.00	$ 6,600.00
LP Non-Cyanide Organic waste poisons	40	55 gal	$ 165.00	$ 6,600.00
LP Alkaline/Caustic	40	55 gal	$ 165.00	$ 6,600.00
LP Pharmaceutical, Chemo, and Mercury	40	55 gal	$ 174.00	$ 6,960.00
LP Oxidizers	20	55 gal	$ 174.00	$ 3,480.00
LP Poison, cyanides, and non-regulated	40	55 gal	$ 165.00	$ 6,600.00
Total Disposal Cost				**$ 106,826.20**

Transportation	Units	UOM	Unit Cost	Total Cost
Waste Removal	8	Trailer	$ 3,550.00	$ 28,400.00
Total Transport cost				**$ 28,400.00**

Decontamination *(Area to be decontaminated 6,760 sq ft, pressure washing rate = 105 sq ft per hour)*	Units	UOM	Unit Cost	Total Cost
ECHOs (Environmental Restoration Cost Book)	6,760	Square Feet	$ 0.35	$ 2,366.00
Disposal of Decon Residual (2 gallons per square foot)	13,520	Gallons	$ 0.57	$ 7,706.40
Total Cost to Decontaminate the Pad				**$ 10,072.40**

Sampling *(Pad rinsate to be sampled (1 sample per 675 feet)*	Units	UOM	Unit Cost	Total Cost
Sampling Labor (30 minutes per sample)	2	Hour	$ 78.00	$ 156.00
Total Sampling Labor Cost				**$ 156.00**

Lab Analysis	Units	UOM	Unit Cost	Total Cost
Metals	4	Sample	$ 160.00	$ 640.00
VOCs + SVOCs	4	Sample	$ 580.00	$ 2,320.00
Pesticides	4	Sample	$ 100.00	$ 400.00
Polychlorinated Biphenyls	4	Sample	$ 100.00	$ 400.00
Total Lab Analysis Cost				**$ 3,760.00**

Total Cost Before Administrative & Contingency Costs	Total Cost
Disposal Cost	$ 106,826.20
Transportation Cost	$ 28,400.00
Decontamination Cost	$ 10,072.40
Sampling Cost	$ 156.00
Lab Analysis Cost	$ 3,760.00
P.E. Certification	$ 300.00
Sub-Total less admin + contin.	**$ 149,514.60**

Administrative Cost @ 15%	$ 22,427.19
Contingency Cost @ 10%	$ 14,951.46

Total Closure Cost	**$ 186,893.25**

Section Divide

Exhibit 10:

Contingency Plan

Contingency Plan

Triumvirate Environmental (Baltimore), LLC
1500 Carbon Avenue
Baltimore, MD 21226

EPA ID No. MDD093002384

Original Version (Rev 0): June 9, 2023
Revision #1: March 21, 2024

Table of Contents

Contingency Plan

1. General

Triumvirate Environmental (Baltimore), LLC (herein known as "TEI") is a CHS facility (herein known as the "truck transfer area") located at 1500 Carbon Avenue in Baltimore, MD. The EPA ID number associated with this CHS facility is MDD093002384.

A wide variety of hazardous and non-hazardous waste in various size containers are transferred between trucks and trailers at TEI. Licensed CHS haulers conduct all waste shipments to and from TEI. Containers of waste are transferred and remain on trucks and trailers located at TEI for up to 10 days and shipped to the disposal facilities indicated on the corresponding shipping documents. TEI is not authorized to treat, store or dispose of hazardous waste at the truck transfer area.
Triumvirate's truck transfer area is 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 non-sudden 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 be maintained at the site and shall be submitted to local police departments, fire departments, and state and local emergency response teams. 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); 26.13.05.04.

1.1. 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 its design, construction, operation, maintenance, or other circumstances – in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
d) The list of Emergency Coordinator 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.

1.2. Contingency Plan Locations

Copies of the Contingency Plan are kept at the site in the Facility Manager's office and with the administrative assistant in the front desk reception area. Copies are also kept electronically on the TEI Compliance Center Controlled Document Library. The Contingency Plan will be accessible for inspection and for use in the event of an

emergency.

1.3. Contingency Plan Drills

The site will conduct emergency response and contingency plan drills annually. The results of the emergency drills will be recorded and any corrective/preventive actions from the drill will be tracked on the TEI Corporate Compliance Corrective Action/Preventive Action (CAPA) list.

2. Emergency Coordinators

The Primary Emergency Coordinator and the designated alternates must be thoroughly familiar with the aspects of this Contingency Plan, the operations and activities at the facility, the location and characteristics of hazardous waste and materials handled at the truck transfer area, the location of the records for the truck transfer area, and the layout of the property. The Emergency Coordinator and Alternates have the authority to commit the resources necessary to carry out this Contingency Plan. The names of the Primary and Alternate Emergency Coordinators are listed in **Table 1 "Emergency Response Coordinators"**.

Table 1: Emergency Response Coordinators

Emergency Coordinators	Title	Home Address	Office #	Cell/Home #
Anthony Merritt (Primary)	Facility Manager	REDACTED REDACTED	(410) 636-3700	REDACTED
Mark Hale (Alternate #1)	Senior Operations Manager	REDACTED REDACTED	(410) 636-3700	REDACTED
Jake Giovanucci (Alternate #2)	General Manager	REDACTED REDACTED	(410) 636-3700	REDACTED

It is the responsibility of TEI's Primary Emergency Coordinator to ensure that measures described in this attachment are coordinated properly during an emergency situation. At all times, the Primary Emergency Coordinator or a designated Alternate Emergency Coordinator is available to respond to an emergency at the truck transfer area. At all times, at least one Emergency Coordinator must be able reach the facility within a short period of time.

3. Fire or Explosion Response Procedures

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

3.1. 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 threatened by the emergency condition.

3.2. Notify Supervisor

As soon as any immediately threatened personnel have been alerted, the Manager or Supervisor responsible for the area must be notified of the emergency condition.

3.3. Supervisor Responsibilities

1. Initiate an investigation when a fire or explosion emergency is reported.
2. Determine if the incident:
   a. Can be handled by Triumvirate personnel
   b. Requires assistance by outside emergency services
   c. Requires an evacuation of personnel and/or equipment [See Evacuation Plan, 6.60 of this plan.].
3. Know the location of fire extinguishing equipment and be familiar with its safe operation.
4. Maintain an awareness of movable equipment (i.e., tanker trucks, forklifts, and company vehicles) within your area of responsibility, should their removal from the facility become necessary. Use qualified personnel and available yard crews to position equipment in a safe area.
5. Notify outside agencies, if necessary.
6. Upon completion of the evacuation, the Emergency Coordinator must be notified as to the status of the evacuees.
7. The local Fire Department or other emergency responder(s) will be met in front of the main entrance to the facility on Sun Street by a Triumvirate representative authorized and able to communicate the situation to the responder(s). This meeting area will be known to all Supervisors and it will the responsibility of the General Manager in charge to designate the responsible representative for this task.

3.4. Notify Emergency Coordinator

In any site emergency, and in any case where the emergency condition involves or may involve hazardous wastes, the Emergency Coordinator must be notified. The Manager or Supervisor, or other responsible personnel on site, shall immediately notify the Emergency Coordinator listed in **Table 1 "Emergency Response Coordinators"**.

3.5. Clear Unnecessary Personnel

Fire or explosion-related areas will be cleared of all unnecessary personnel.

3.6. Evacuation

If the Spill Response Coordinator or his designee determines that evacuation of all or part of the facility is appropriate, then the Evacuation Plan shall be implemented by the Spill Response Coordinator.

3.7. Medical Response

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

3.8. Essential Fire Safety

In the event of a fire, the fire department will be called to respond. For safety reasons, Triumvirate personnel will not respond to the fire.

3.9. Keep Fire from Hazardous Waste

Consistent with the personal safety of Triumvirate personnel and emergency responders, care must be taken to

prevent the fire from spreading to any hazardous wastes.

3.10. Mutual Aid Response Organizations

For any emergency requiring outside assistance, a list of community emergency responders (police, fire, hospital, etc.) and their phone numbers is located in **Section 7 "Mutual Aid Organizations".**

4. 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.

4.1. Alert Affected Personnel

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

4.2. Notify Supervisor

As soon as any immediately threatened personnel have been alerted, the Manager or Supervisor responsible for the area must be notified of the emergency condition.

4.3. Notify Emergency Coordinator

In any site emergency, and in any case where the emergency condition involves or may involve hazardous wastes, the Emergency Coordinator must be notified. The Manager or Supervisor, or other responsible personnel on site, shall notify the Spill Response Coordinator immediately. The Emergency Coordinators are listed in **Table 1 "Emergency Response Coordinators"**.

4.4. Use Of Protective Equipment

Spilled material will not be handled without protective equipment. Protective suits, gloves, and respirators are available and must be used.

4.5. Containers for Spilled Waste and Cleanup Materials

The material spilled will be absorbed and repackaged in new, secure United States Department of Transportation-approved containers.

4.6. Disposal of Cleanup Tools and Absorbent Materials

Cleanup tools designated for that purpose (shovels, brooms, etc.) will be used to clean up a spill and the spent absorbent material will be sent to a licensed hazardous waste disposal facility.

4.7. Contaminated Clothing, etc.

Personnel are instructed to promptly remove any contaminated shoes or clothing, and to properly decontaminate themselves, if necessary. Disposition of contaminated shoes and clothing will be determined by the Spill Response Coordinator.

4.8. Mutual Aid Response Organizations

For any emergency requiring outside assistance, a list of community emergency responders (police, fire, hospital, etc.) and their phone numbers is set forth in **Section 7 "Mutual Aid Organizations"**.

5. Emergency Coordinator Specific Responsibilities

The decision to implement this contingency plan depends upon an assessment made by the Emergency Coordinator as to whether an imminent or actual incident involving hazardous waste could threaten human health or the environment. The Emergency Coordinator will direct the response to assure conformity of emergency response procedures with all applicable local, state, and federal regulations. The Emergency Coordinator is authorized to commit internal and subcontracted resources to a response effort at the property. During an emergency incident, the Emergency Coordinator is authorized to transfer authority and delegate tasks to qualified individuals.

5.1. Response Priorities

The primary response to any emergency involving hazardous waste will be to first protect human health, and then to protect the environment. In any emergency involving hazardous waste, waste identification, containment, treatment, and disposal assessment will be secondary considerations.

5.2. Specific Responsibilities

Specific responsibilities of the Emergency Coordinator are listed in the following section.

5.3. In The Event of an Imminent or Actual Emergency

Whenever there is an imminent or actual emergency situation, the Emergency Coordinator (or his designee, when the Emergency Coordinator is on call) must immediately:

5.3.1. Notify facility personnel – Activate internal alarms or facility communication systems to notify personnel.

5.3.2. Notify other mutual aid response organizations, as applicable.

5.3.3. Commit internal and subcontracted resources to the response effort.

5.3.4. Transfer authority and delegate tasks to qualified individuals.

5.3.5. Coordination/Cooperation with Emergency Responders – In any emergency requiring or resulting in the use of emergency responders, the Emergency Coordinator shall ensure coordination and cooperation with and between emergency responders and Triumvirate personnel.

5.3.6. Establish Command Post – The Emergency Coordinator will establish a Command Post that is located upwind of the incident. The Emergency Coordinator or his designee at the Command Post must record information concerning the incident.

5.3.7. Evacuation/Emergency Response Tasks – Consistent with the operations of emergency responders, the Emergency Coordinator (or designee) shall implement the necessary and appropriate evacuation of personnel and equipment. Additionally, they shall assure that the following groupings of tasks are assigned to one or more responsible persons among staff and employees available at the time:

"A" Tasks

- Meet emergency responders (Fire Department, ambulance, etc).

- Provide emergency responders with relevant information (i.e., type and location of emergency, any known injuries, hazardous wastes involved, etc.).
- Remain with Fire Chief or other responsible emergency responders until relieved by the Spill Response/Emergency Coordinator.

"B" Tasks

- Account for all Triumvirate personnel and make inquiry regarding visitors or contractor personnel who may be on site. Accounting for visitors and contractors will be done through the use of a facility sign-in log located in the front reception area of the facility.
- Advise Command Post of any personnel not accounted for.
- Determine the nature and extent of any injuries to personnel.
- Provide appropriate information to employees as to site conditions and responsibilities.
- Maintain communications with the Command Post.

"C" Tasks

- Ensure the immediate termination of electrical power upon the direction of the Fire Chief, Spill Response / Emergency Coordinator, or any person authorized by them.
- Assist, as necessary, with the removal of equipment while remaining consistent with the safety of personnel. The area around the facility must generally be kept clear of obstructions, for use by emergency responders, if necessary.

Personnel will receive initial training in their responsibility for A, B, or C tasks listed above and will receive annual refresher training thereafter. The following personnel will be responsible for each of the task categories:

- **"A" Task Responsibility** = Facility Manager with possible assistance from Environmental Transportation and Safety Compliance (ETSC) representative
- **"B" Task Responsibility** = Administrative Assistant with possible assistance from Environmental Transportation and Safety Compliance (ETSC) representative
- **"C" Task Responsibility** = 10-Day Coordinator with possible assistance from Environmental Transportation and Safety Compliance (ETSC) representative

5.4. Hazardous Waste Emergencies – Identify Character/Source/Amount/Area of Released Material

Whenever there is a release, fire, or explosion involving hazardous waste the Emergency Coordinator must immediately identify the character, exact source, amount, and extent of any released hazardous waste. Wherever possible, this shall be done by observation, then by facility records or manifests and, if necessary, by chemical analysis.

5.5. Assess Hazards to Health And Environment

Concurrently, the Emergency Coordinator must assess possible hazards to human health and the environment. This assessment must consider both direct and indirect effects. (An example of a direct effect is the impact of toxic or irritating gases that are generated; an example of an indirect effect is the impact of contaminated surface water runoff from water or chemical agents used to control fires.)

5.6. If Health or Environment of Neighboring Properties are Threatened

If the Emergency Coordinator determines that the facility has had a release, fire, or explosion involving hazardous waste that could threaten human health or the environment of neighboring properties, the following actions will be taken:

5.6.1. **Evacuation of Local Areas:** An assessment shall be made whether evacuation of local areas may be necessary. If the assessment indicates that evacuation of local areas may be necessary, the Emergency Coordinator will immediately notify appropriate local authorities.

5.6.2. **Direct Notification of Adjacent Properties:** Adjacent properties will be notified directly of incidents that could have major, imminent off-site impacts. The following emergency notification numbers will be used for adjacent properties:

- Samuel Coralluzzo Co., Inc. & Torriss Transport (West of facility): 1-800-899-1142
- Baltimore Scrap Corporation (North and East of facility): 1-410-355-4455
- Mauser Packaging Solutions (South of facility): 1-410-355-3111

5.6.3. **Notification of Governmental Authorities:** The Emergency Coordinator will immediately notify the National Response Center, the Maryland Department of the Environment (MDE) Solid Waste Program, and the MDE Emergency Response Division, by phone, and provide the following information:

- Name and telephone number of reporter;
- Name and address of facility;
- Time and type of incident (e.g., release, fire);
- 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 of the facility.

Contact Numbers:

- EPA – National Response Center: (800) 424-8802
- MDE Solid Waste Program: (410) 537-3315 for incidents that occur during normal MDE office hours (8:00 AM – 5:00 PM, Monday – Friday)
- MDE – Emergency Response Division: (866) 633-4886

5.7. Obtain Information on Materials

The Emergency Coordinator will work with the site ETSC to obtain hazard information for materials involved in an incident. This information may be in the form of a Safety Data Sheet (SDS) for virgin or raw materials, or, for waste materials, it may be in the form of Waste Profiles located within Triumvirate's WasteLand software system. SDSs for virgin or raw materials will be kept electronically at the site. If an emergency situation involves a large number of different chemicals (e.g., a fire involving a fully loaded transport trailer), waste profile information is accessible from the TEI WasteLand software and can be accessed from any computer or tablet on Triumvirate's network.

Material information may used:

- For emergency first aid (to go with any victims).
- For fire-fighting practices (to have in hand for Fire Department or those responding to scene).

5.8. Protect Against Expanded Emergency

During the incident, the Emergency Coordinator must take the reasonable steps and measures necessary to ensure

that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures include, where applicable and where safe to do so, stopping processes and operations, collecting, and containing released waste, and removing or isolating containers.

5.9. Monitor Systems and Equipment

The Emergency Coordinator will monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, tanks, or other equipment, wherever appropriate and safe to do so.

5.10. Post-Incident Waste Handling/Disposal

Immediately after an emergency, the Emergency Coordinator will arrange for the treatment, storage, or disposal of any recovered waste, contaminated soil, contaminated surface water, or any other material that results from a release, fire, or explosion at the facility. The resulting contaminated material must be managed as a potentially hazardous waste, pending further analysis of material.

5.11. Clean-Up Responsibilities

The Emergency Coordinator must ensure that the following tasks have been performed prior to resuming normal truck transfer operations:

5.11.1. All surfaces have been properly decontaminated of hazardous residues resulting from the emergency response.

5.11.2. All emergency equipment listed in the contingency plan is replaced or restored to its original condition/location

5.12. Notice Prior To Resuming Operations

The Emergency Coordinator must notify Triumvirate Environmental Headquarters before resuming operations. Once notified, TEI must then notify the Maryland Secretary of the Environment and other appropriate State and local authorities. Operations may not resume at the truck transfer areas until this notice is given to MDE.

5.13. Emergency Coordinator's Written Report

The Emergency Coordinator must submit to Triumvirate Corporate Compliance within 3 calendar days a completed Incident Report Form which records the time, date, and details of any incident that required implementation of this Contingency Plan. Triumvirate will prepare a report to be submitted to the Solid Waste Program of the Maryland Department of the Environment and the Regional Administrator within 15 days after the incident. The report must include:

- Name, address, and telephone number of the owner or operator of the property.
- Name, address, and telephone number of the property.
- Date, time, and type of incident (e.g., fire, explosion).
- Name and quantity of material(s) involved.
- Extent of injuries (if any)
- Assessment of actual or potential hazards to human health or the environment, where applicable.
- Estimated quantity and disposition of recovered material that resulted from the incident.

6. Emergency Response Systems and Equipment

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

6.1. Notification Systems

If evacuation is necessary, personnel will be notified to evacuate in an orderly fashion via communication radios used at Triumvirate or by direct communication by the Facility Manager or their designee. An "all clear" signal will be given when the fire has been extinguished and the safety of personnel is no longer endangered.

In addition to communication radios or direct communication, airhorns will be located at the site to allow for an additional audible alert method. A single, extended blast from the airhorn for more than 3 seconds indicates an emergency situation and an urgent need for assistance.

If an evacuation occurs, the supervisor of each person at the site will be responsible for performing a headcount of their employees and reporting this to the Emergency Coordinator. Due to the small size of the transfer area and the overall facility footprint, timely notification of all personnel is not considered to be a risk factor in providing notice of a hazard or evacuation.

6.2. Fire Control Equipment

Fire extinguishers are located in several locations throughout the truck transfer areas and on every vehicle/trailer parked at the transfer area. TEI contracts a qualified 3rd party vendor to inspect the fire extinguishers every 12 months. The fire extinguisher locations are shown on **Figure 4 "Site Plans"**.

There is a fire hydrant which is located directly across the Sun Street to the East of the property. The fire hydrant location is shown on **Figure 4 "Site Plans"**.

6.3. 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 overpack drum, sorbents and other materials commonly used to contain accidental releases that may occur while containers are in transit. Additional Spill Response kits are stored at 1500 Carbon Ave. TEI also maintains a Hazardous Material Spill Response trailer, and a warehouse filled with spill response equipment at 1500 Carbon Ave.

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 weekly during site inspections.

6.4. 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.

6.5. First Aid

First aid needed at this facility is available at the Harbor Hospital Center, (410) 350-3200, 3001 South Hanover Street, Baltimore, MD.

In addition, first aid kits at the site are shown in **Figure 4 "Site Plans"**.

6.6. Internal Communication Devices

Cellular phones or an airhorn is used within the truck transfer area to alert others of emergency situations. All TEI personnel have cellular phones. TEI personnel are trained to recognize that a single, extended blast from the airhorn for more than 3 seconds indicates an emergency situation and an urgent need for assistance. The airhorns are inspected weekly to verify that they are operational.

6.7. External Communication Devices

Telephones are located the 1500 Carbon Avenue office and can be used to summon emergency assistance from the police, fire department, or other response units. In addition, all TEI personnel have cellular phones.

6.8. Emergency Equipment

The list of emergency equipment maintained at TEI and inspection schedule for the emergency equipment is shown in **Table 2 "List of Emergency Equipment and PPE"**.

Table 2: List of Emergency Equipment and PPE

Item	Minimum Quantity	Inspection Frequency*
Dry Chemical Agent Fire Extinguishers to cover Class A, B, and C fires	4	Weekly
Sorbents (bail)	1	Weekly
Speedi-Dry (16 lb bag)	1	Weekly
Spill Booms	9 ft of coverage	Weekly
Acid Neutralizer	1, 40-50 lb bag	Weekly
Caustic Neutralizer	1, 40-50 lb bag	Weekly
Overpacks	1	Weekly
Tyvek Suit	1 box	Weekly
Gloves	1 box	Weekly
Rubber Boots	2 pairs	Weekly
Airhorn	1	Weekly
SCBA	2	Weekly
**Tamper evident tape, or equivalent means of security, may be used to indicate that items have not changed since the previous inspection.*		

7. Mutual Aid Response Organizations

The organizations listed below can be contacted for assistance in the event of an emergency at Triumvirate in Baltimore. Copies of the contingency plan have been submitted to the following facilities to familiarize them with the hazardous

materials on site and emergency response equipment.

Arrangements agreed to by outside agencies to coordinate emergency services are shown in the "Agreed Arrangement" column in Table below.

Table 3: Mutual Aid Response Organization Details			
Organization	**Agreed Arrangement**	**Phone**	**Address**
MDE Emergency Response Division (ERD)	MDE's Emergency Response Division (ERD) prepares for and responds to emergencies involving oil and hazardous chemical spill incidents, and other environmental crises. Use the hotline above only for cases with **IMMEDIATE** threat to public health and grave impact to the environment.	866-633-4886	1800 Washington Boulevard, Suite 105 Baltimore, MD 21230
National Response Center (NRC)	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.	800-424-8802 If there is no answer, call the alternate number (202-267-2675) or call EPA Regional Office at (215-814-9016).	United States Coast Guard (CG-5335) - Stop 7581, 2100 2nd Street, SW, Washington, DC 20593-0001
Baltimore Police Department – Southern District	This police department is the closest and will respond to requests from the facility during an incident requiring the implementation of this plan.	Emergency: 911 Non-Emergency: 410-396-2499	10 Cherry Hill Road Baltimore, MD 21225
Baltimore Fire Department – Engine 35	The Baltimore Fire Department will be the primary responder to any fire emergency, Engine 35 is the closest station house.	Emergency: 911 Non-Emergency: 410-396-1235	430 Maude Ave Baltimore, MD 21225
Harbor Hospital Center	This medical center will act in its normal capacity to administer emergency care to any personnel requiring such during an accident.	410-350-3200	3001 South Hanover Street, Baltimore, MD 21225
John Hopkins Bayview Medical Center	This hospital will provide additional assistance.	410-550-0100	4940 Eastern Avenue, Baltimore, MD 21224
ACV (formerly Clean Venture, Inc.)	This firm provides a wide spectrum of environmental clean-up services.	410-368-9170	2931 Whittington Avenue, Baltimore, MD 21230

8. Evacuation Plan

This Evacuation Plan will serve 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 Emergency Coordinator in connection with evacuation are set forth in the Contingency Plan. In addition to the actions listed below, employees shall follow directions from the Emergency Coordinator, or his designee:**

1. A call for evacuation shall be initiated by communication radios used at Triumvirate or by direct communication with the Facility Manager or their designee. Additionally, airhorns will be located at the site to allow for an audible alert method. A single, extended blast from the airhorn for more than 3 seconds indicates an emergency situation and an urgent need for assistance.
2. 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.
3. Personnel shall exit the property if it safe to do so. Triumvirate personnel will exit the through the main exit gate on the west side of the property. In cases where the primary exit gate is blocked by releases of hazardous waste or fires, emergency personnel will redirect employees to the personnel door on the southwest side of the property (south of the main gate). A third exit exists through the "barn door" gate at the northwest corner of the property. This gate is normally secured with a lock and chain. The Facility Manager or designee have the ability to unlock this gate if the primary and secondary means of egress are blocked. The evacuation exits are shown in **Figure 4 "Site Plans"**.
4. Evacuees shall report directly to the primary rally area located directly outside of the primary gate entrance/exit of 1500 Carbon Ave where they can be accounted-for and given further instructions. If the primary rally area is rendered unsafe as a result of the incident, evacuees shall assemble at the secondary rally area at the entrance on the western side of the property located at 3200 Sun Street. The evacuation route, primary rally point, and secondary rally point are shown in **Figure 4 "Site Plans"**.
5. No personnel shall remain in, or re-enter, the truck transfer areas unless specifically authorized by the Emergency Coordinator.
6. Re-entry into the area shall be made only after the Emergency Coordinator gives clearance. At his direction, a signal or other notification shall be given for re-entry into the truck to truck transfer area.

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.

9. Version History

Version #	Revision Date	Description of Change	Document Approver
0	6/9/2023	Document created for 10-Day permit application.	Anthony Merritt
1	3/23/2024	Revised per MDE comments for 10-day permit application.	Anthony Merritt