Appendix II

**JSA Form** 

# Job Safety Analysis

# Hazard/Risk Assessment

General	Client:			Address:		
Information/						
Permits						
(Audit: 1pt for complete/correct general information & 1pt for correct permit information)						
	PSC Supervis		Required		□ Confined Space Entry □ Lock-out/Tag-out	
SCORE =/2	Date & Time		Permits	□ Hot V	Nork 🛛 Other:	
Hazards -		d (Corrosive) 🛛 Basic (C	orrosive) 🔲	Ignitable	e 🗆 Toxic 🗆 PIH 🗖 Organic Peroxide	
Chemical (Audit: 1pt for proper & accurate	□ Oxidizer	Cartive	□Cyanide □Sul	fde) 🗖 U	Inknown Chemicals 🛛 Gases	
completion)           SCORE =/1         □ All □ Other: □ 0			□ Other:			
Hazards -	Access -	Limited			Lighting (Inadequate)	
Physical	Access -	Confined Space*			□ Noise	
(Audit: 1pt for proper & accurate completion)	Airborne	Particles			Overhead Work	
completion	Energy T	ransfer - Equipment	*		Pressurized Equipment	
	Energy T	ransfer - Static Elec	tricity		Pinch Points	
SCORE =/1		ent (Blinds Installed/Valves B	and the second		Puncture Hazard (Sharps)	
	test in the second second	nt (Jammed/Faulty)			□ Slip/Trip/Fall (Above Ground)	
		nt (Opening)			□ Slip/Trip/Fall (Ground Level)	
		uipment in Use			□ Surfaces (Hot/Cold) □ Ventilation (Inadequate) □	
		ork/Fall Potential				
	□ High Trat					
		eping (Inadequate)				
	Lifting - I					
llemende		Hazard	_		Specific Conditions	
Hazards -	Animals (	□ Animals (Displaced/Encountered)			Note Specifics Here	
Environmental (Audit: 1pt for proper & accurate	Climate Conditions				🗆 Cold 🛛 Heat	
completion)	Weather Conditions				Note Specifics Here	
SCORE =/1	Other:				Note Specifics Here	
/ =	Other:	er:			Note Specifics Here	
Potential Route of Entry	🗆 Dermal (	Contact) 🛛 🗆 Inges	tion 🗆	Injectio	n 🔲 Inhalation (Breathing) 🗆 ALL	
SCORE =/12	-	Projec	t Walk	Thro	uab	
Project Steps (4 M		(Audit: 1 point for complete & ac			ugn	
Project Steps (4 M	in instand	A REAL PROPERTY OF A DESCRIPTION OF A DE		to 3 points/ste	ep. Up to 12 points total)	
1)	inimum)	A REAL PROPERTY OF A DESCRIPTION OF A DE	al Risks	to 3 points/ste	ugn ep. Up to 12 points total) Safety Measures	
1)	inimum)	A REAL PROPERTY OF A DESCRIPTION OF A DE		to 3 points/ste	ep. Up to 12 points total)	
	inimum)	A REAL PROPERTY OF A DESCRIPTION OF A DE		to 3 points/ste	ep. Up to 12 points total)	
1) 2)	inimum)	A REAL PROPERTY OF A DESCRIPTION OF A DE		to 3 points/ste	ep. Up to 12 points total)	
2)	inimum)	A REAL PROPERTY OF A DESCRIPTION OF A DE		to 3 points/ste	ep. Up to 12 points total)	
	inimum)	A REAL PROPERTY OF A DESCRIPTION OF A DE		o 3 points/ste	ep. Up to 12 points total)	
2) 3)	inimum)	A REAL PROPERTY OF A DESCRIPTION OF A DE		to 3 points/ste	ep. Up to 12 points total)	
2)	inimum)	A REAL PROPERTY OF A DESCRIPTION OF A DE		to 3 points/ste	ep. Up to 12 points total)	
2) 3)	inimum)	A REAL PROPERTY OF A DESCRIPTION OF A DE		co 3 points/ste	ep. Up to 12 points total)	
2) 3) 4) 5)	inimum)	A REAL PROPERTY OF A DESCRIPTION OF A DE		co 3 points/ste	ep. Up to 12 points total)	
2) 3) 4)	inimum)	A REAL PROPERTY OF A DESCRIPTION OF A DE		co 3 points/ste	ep. Up to 12 points total)	
2) 3) 4) 5)	inimum)	A REAL PROPERTY OF A DESCRIPTION OF A DE		o 3 points/ste	ep. Up to 12 points total)	
<ul> <li>2)</li> <li>3)</li> <li>4)</li> <li>5)</li> <li>6)</li> <li>Page 1 - Hazards Audi</li> </ul>	t Score	Potenti	al Risks	AUDITOP	ep. Up to 12 points total) Safety Measures	
2) 3) 4) 5) 6)	t Score ore	Potenti	al Risks	AUDITOP	safety Measures  Safety Measures	

# Job Safety Analysis

# Safety & Protection Assignments

Job Safety Analysis Safety & Protection Assignments						
Personal	Protection	Level	D			
Protective	Head	Hard hat		Suit hood	□ Face shield	□
Equipment	Eyes	□ Safety glas	ses	□ Goggles	□ Welding shield	□
(Audit: 1pt per category - complete and accurate)	Ears	🗆 Ear plugs		□ Ear muffs	□	□
	Hands	<ul> <li>Cloth glove</li> <li>Blue Nitrile</li> </ul>		Leather gloves Green Nitrile	<ul> <li>PVC gloves</li> <li>Burn resistant gloves</li> </ul>	Cut resistant gloves
SCORE =/8	Feet	□ Steel Toed □ Chemical B		Tyvek Covers Rubber boots	Steel toed metatarsals     Latex boot covers	s 🗆
		Suit Type =	oots			<u> </u>
	Body	□ Work unifo	rm	□ Tape extremities	Hooded suits required	Rain suit
		□ Coveralls		□ Fall protection	□ Suit with hands/feet r	
		D Nomax		Apron permitted	Reflective clothing req	
	Respirator	□ Air Purifyin	g 🗲	Full Face     Half Face	e 🗆 Dust Mask 🗲 Cartridg	
		Supplied Ai	ir 🗲	□ SCBA (Self Contained	Breathing Apparatus) 🛛 Air	Line
Safety	Eye wash*_			□ Traffic cones	🗆 1st Aid Kit (w/ HF anti	dote if handling HF)
Equipment	□ Safety showe	r*		Caution tape	Decontamination equip	oment/supplies
*List location of equipment. (Audit: 1pt for proper & accurate		sher*		Fall protection	Lock-out/Tag-out equi	pment
completion. 1pt for listing location(s))	□ Fire Alarm*			Handrail	Grounding equipment	
SCORE =/2	D Non-sparkir	g tools		D	<u> </u>	
Emergency	Call 911	Follow	Client I	Procedures below	Follow PSC Procedures	
Procedures	Emergency	/ Procedure	es:			
(Audit: 3pts for proper & accurate completion, otherwise 0pts)	Audit: 3pts for proper & accurate					
SCORE =/3	🗆 Establish E	vacuation Poi	int	→ (Location)		_)
		oute Upwind ate Route to (		Wind Direction - N	NE E SE S SW V	V NW (Circle Direction)
Safety Notes		• •	-	od Condition)	Inspect equipment/to	ools
(Audit: 1pt for proper & accurate completion)	<ul> <li>Use proper lifting technique</li> <li>Pay attention to walking surface(s)</li> </ul>			· .	-	<ul> <li>Secure/chock vehicle</li> </ul>
	Pay attention Locate/revi	-	surface	(s)		uthorized personnel only
SCORE =/1		ew MSDS(S) ety watch as r	needed		□ Confirm/inspect anch	or points
			lecucu			
SCORE =/3		ployees sign & date,		all employees sign & date - If MIC	O-SHIFT required, it must be complete	
FRE JOD ING	ine (Find Sign	a Datej	_			ny sign & Datey
	MTD CUT	TEVALU				
SCORE =/3					completed: 1) If there are ad ) If there is more than 3 hour	ditional or modified task risks, 2) If s between task activities.)
	(Audit: 3pts for prop	er & accurate complet	tion, Opts if	not properly & accurately comple	eted)	
		w JSA and Sigi	n below	· ·		elow section, review and sign)
Additional/Mo 1)	aified Risk			Safety Mo	dification to Eliminate R	isk/Hazard
2)						
3)						
JOB/SHIFT JSA	Date & Time:			PSC Supervisor Na	me (Print/Sign):	
CLOSE-OUT:						

# Appendix III

**Training Courses** 

- Introduction Hazardous Materials Regulatory Overview
   1.1. What is HAZWOPER
   1.2. CERCLA, RCRA, SARA, TSCA, EPA, DOT, NIOSH
- 2. 29 CFR 1910.1200 Hazard Communication
  - 2.1. Employee Right to Know
  - 2.2. MSDS
  - 2.3. Written Communication Program
- 3. Principles of Safety
  - 3.1. Accident Prevention Plan
  - 3.2. Fall Protection
  - 3.3. Hearing Conservation
  - 3.4. Hand Protection
  - 3.5. Biological Hazards
  - 3.6. Eye & face Protection
  - 3.7. Foot Protection
  - 3.8. Lockout, Tagout, Try
  - 3.9. Respiratory Protection
  - 3.10. Bonding & Grounding
- 4. Toxicology
  - 4.1. Acute vs. Chronic
  - 4.2. Exposure Limits
  - 4.3. Chemical Toxicology
  - 4.4. Radiological Toxicology
  - 4.5. Routes of Entry
- 5. Hazard Identification
  - 5.1. Hazard Descriptions
  - 5.2. DOT Classification
  - 5.3. Shipping Documents
- 6. Personal Protective Equipment
  - 6.1. Types of Protection
  - 6.2. Levels of Protection
  - 6.3. PPE Limitations
  - 6.4. Respiratory Protection Program
- 7. Fire Hazards
  - 7.1. Fire Triangle
  - 7.2. Extinguisher Types
  - 7.3. Location of Extinguishers
- 8. Handling Drums and Containers
  - 8.1. Inspection
  - 8.2. Handling
  - 8.3. Staging

- 8.4. Sampling
- 8.5. Consolidation
- 9. Confined Spaces 29 CFR 1910.146
  - 9.1. Hazardous Atmospheres
  - 9.2. Atmospheric Testing
  - 9.3. Entry Procedures
  - 9.4. Evacuation
  - 9.5. Site Security
- 10. Medical Surveillance
  - 10.1. OSHA Medical Requirements
  - 10.2. Medical Examinations
  - 10.3. Emergency & Non-emergency Treatment
- 11. Site Emergencies
  - 11.1. Incident Management & Scene Control
  - 11.2. Site Safety Plan
  - 11.3. Emergency Training
  - 11.4. Site Security and Control
  - 11.5. Onsite Communication
  - 11.6. Emergency Identification and Prevention
  - 11.7. Emergency Response Procedures
  - 11.8. Evacuation Routes and Procedures
  - 11.9. Decontamination
  - 11.10. Decontamination Methods & Processes
  - 11.11. Follow-up

On The Job Training (OJT):

- 1. Standard Operating Procedures (SOPs)
- 2. Job Safety Analysis (JSA)

# Petro-Chem General Employment Training Packet

Employee Name:	Employee #:	
Area / Location:	Date:	
	 Date	
	Completed	Trainer Signature
TRAINING & DOCUMENTATION		Hamer eignatare
NEW EMPLOYEE ORIENTATION CD		
I. Safe On Purpose		
II. Respiratory Protection		
III. Confined Space Entry		
IV. Heat & Cold Stress		
V. Lock-Out / Tag-Out		
VI. Personal Protective Equipment	с	
VII. PSC Safety Rules		
VIII. Material Handling / Proper Lifting Technique		
IX. PSC Scaffolding Requirements / Ladder Safety		
X. PSC Hazard Communication		
XI. Hearing Conservation		
XII. Electrical Safety Awareness		
XIII. Fire Extinguisher		
XIV. Hands On Training		
Safe On Purpose - Watch Card		
Safe On Purpose - JSA		
Respiratory Protection		
Confined Space Entry		
Lock-Out Tag-Out		
Personal Protective Equipment (PPE)		
Fire Extinguisher		
	Date	
	Completed	Comments
Pulmonary Function Testing (If necessary)		
CBC/SMAC Bloodwork		
Lead/Benzene Bloodwork - questionnaire Audiometric Testing		
Medical Questionnaire		
Blood Pressure		
Dr. written opinion fit for duty		
I hereby acknowledge that I have received,	NOTES:	
understand, and agree to comply with all the		
above training.		
Employee Signature		
I hereby acknowledge that the above training has		
been completed.		
Manager or Authorized Representative		

NOTE: Additional specific safety training may be conducted at the jobsite.

# Petro-Chem Site Specific Training

Employee Name:	Emplo	oyee #:
Area / Location:	Star	t Date:

		Date	
		Completed	Trainer Signature
	Training Item		
I.	Air Handling Systems:		
	a) CMB Scrubber		
	b) Vapor Balance System		
II.	Tank Farm Operations (Loading/Unloading)		
	a) TS1 Pump System		
	b) TS2 Pump System		
	c) TS3 Pump System		
	d) TS4 Pump System		
	e) Centrifugal Pump System - Recycling		
	f) CMB Pump System		
III.	LabPack Depacking/Commingling		
IV.	Loosepack Consolidation/Commingling		
V.	Solids Consolidation		
VI.	Container Vacuuming		
VII	Container Emptying - CMB Pump Room		
VIII.	Container Loading/Unloading		
IX	Sampling		
Х.	Inspections		

I hereby acknowledge that I have received, understand, and agree to comply with all the above training.	NOTES:
Employee Signature	
I hereby acknowledge that the above training has been completed.	
Manager or Authorized Representative	-

NOTE: See PCPG SOPs for specific content - all include housekeeping and H&S requirements

# Petro-Chem Additional Training

# SAFE ON PURPOSE

Employ	Employee Name: Employee #:		
Area / L	Area / Location:		
		Date Completed	Trainer Signature
	Service Line Specific		
I. 24	4 Hour HAZWOPER Training		
II. Bo	enzene Hazard Awareness Training		
	ydrogen Sulfide Hazard Awareness Training		
	ead Hazard Awareness Training		
V. A	sbestos Training		
	orklift Training		
	loodborne Pathogens		
	PR / First Aid Training		
	verhead Cranes Hazard Awareness Training		
	escue (intercompany/3rd party)		
XI. S	upervisor Training		
	mith System		
	enzene Awareness Training		
	lydrogen Sulfide Awareness Training		
	ead Awareness Training		
	sbestos Awareness Training		
	rsenic Awareness Training		
XVIII. O			
XIX. O	Other:		
	Other:		
XXI. O			
XXII. O	Other:		

I hereby acknowledge that I have received, understand, and agree to comply with all the above training.	NOTES:
Employee Signature	
I hereby acknowledge that the above training has been completed.	
Manager or Authorized Representative	1

NOTE: Additional specific safety training may be conducted at the jobsite.

- 1. Introduction RCRA Regulatory Overview
  - 1.1. 40 CFR 270
  - 1.2. 40 CFR 264
    - 1.2.1. General Facility Standards
    - 1.2.2. Preparedness & Prevention
    - 1.2.3. Contingency Plan & Emergency Procedures
    - 1.2.4. Manifest System, Recordkeeping and Reporting
    - 1.2.5. Use & Management of Containers
    - 1.2.6. Tank Systems
    - 1.2.7. Subpart BB
    - 1.2.8. Subpart CC
    - 1.2.9. General Requirements for Ignitable, Reactive or Incompatible Wastes
  - 1.3. MDEQ Part 111 of Act 451
- 2. MDEQ License
  - 2.1. Standard/General Operating Conditions
  - 2.2. Container Management Units
  - 2.3. Tank Management Units
  - 2.4. Environmental Monitoring
  - 2.5. Manifests
  - 2.6. Recordkeeping
  - 2.7. Permit Modifications
- 3. MDEQ Permit Attachments
  - 3.1. Waste Analysis Plan
  - 3.2. Inspection Plan
  - 3.3. Personnel Training Plan
  - 3.4. Contingency Plan
  - 3.5. Closure Plan
  - 3.6. Process Information
  - 3.7. Environmental Monitoring
  - 3.8. Corrective Action Inspection

# Petro-Chem Site Specific Training

Employee Name:	Employee #:
Area / Location:	Start Date:

		Date Completed	Trainer Signature
	Training Item		
I.	Air Handling Systems:		
	a) CMB Scrubber		
	b) Vapor Balance System		
II.	Tank Farm Operations (Loading/Unloading)		
	a) TS1 Pump System		
	b) TS2 Pump System		
	c) TS3 Pump System		
	d) TS4 Pump System		
	e) Centrifugal Pump System - Recycling		
	f) CMB Pump System		
III.	LabPack Depacking/Commingling		
IV.	Loosepack Consolidation/Commingling		
V.	Solids Consolidation		
VI.	Container Vacuuming		
VII	Container Emptying - CMB Pump Room		
VIII.	Container Loading/Unloading		
IX	Sampling		
Х.	Inspections		
	mopooriond		

I hereby acknowledge that I have received, understand, and agree to comply with all the above training.	NOTES:
Employee Signature	
I hereby acknowledge that the above training has been completed.	
Manager or Authorized Representative	

NOTE: See PCPG SOPs for specific content - all include housekeeping and H&S requirements

# Appendix IV

Training by Position

# Petro-Chem

# PROPRIETARY

# JOB DESCRIPTION

CONFIDENTIAL

JOB TITLE:	Materials Manager	INCENTIVE ELIGIBLE:	
JOB FAMILY:	Waste Treatment	CAR ALLOWANCE:	
JOB FUNCTION:	Management & Compliance	REPORTS TO:	
JOB CODE:	100152	PAY RANGE:	
FLSA	Exempt	JOB LOCATION:	
DATE PREPARED:	5/15/08	DEPARTMENT:	<u></u>
DATE REVISED:		DIVISION:	ESD

#### JOB SUMMARY:

Manages the appropriate treatment and pricing of all inbound and outbound waste materials received and/ or shipped from waste operating facilities to ensure achievement of financial, compliance, and service goals in accordance with appropriate regulations and PSC policies, practices and procedures.

#### PRINCIPAL DUTIES AND RESPONSIBILITIES:

- Supervises operation and regulatory review of inbound and outbound waste profiles.
- Determines appropriate treatment requirements and pricing. Provides technical support to other departments
  on profiling and regulatory issues. Recertifies all waste approvals.
- Develops and maintains accurate disposal cost information. Maintain comprehensive and accurate waste pricing and disposal.
- · Ensures that pricing accurately reflects required treatment and disposal cost with agreed margin.
- Works to minimize disposal expense by proper management of wastes, identification of alternative methods
  of disposal and cost control of final disposal options.
- Maintains efficient flow and approval of customer profiles within agreed time frames.
- May supervise lab personnel. Reviews lab analytical results.
- Maintains waste generator files.
- Provides technical support to sales and outside customers on waste pricing and disposal issues.

#### SCOPE:

- Number of Reports:
  - o Direct 2
    - o Indirect 0
- Number of facilities: 1
- Geography: Location

#### **MEASURES OF PERFORMANCE:**

- Productivity
- Cost Effectiveness
- Efficiency
- Safety

#### EDUCATION/CREDENTIALS:

· Bachelor's degree from a 4-year college or university; with preferred emphasis on Chemistry

PSC considers applicants for all positions without regard to race, color, religion, creed, gender, national origin, age, special disability or medical or veteran status in accordance with federal law and complies with applicable state and local laws prohibiting discrimination in employment in every jurisdiction in which it maintains facilities. C:\Documents and Settings\amorta\My Documents\PSC MOST CURRENT MAY2010\PSC Information\job descriptions\Materials\_Manager.doc



# JOB DESCRIPTION

CONFIDENTIAL

#### JOB RELATED EXPERIENCE:

• Prefer 2-3 years of related job experience

DEMONSTRATED KNOWLEDGE, SKILLS AND ABILITIES:

- Good analytical and problem solving skills
- Good communication and leadership skills
- Experience with local, state and federal agencies and regulations
- Strong computer skills with emphasis in Microsoft Excel and Word

#### WORKING CONDITIONS:

Treatment Plant

#### ESSENTIAL ABILITIES AND WORKING CONDITIONS Environmental Demands

Please place a check mark in the appropriate box to indicate the physical and mental demands of this position: (Modifications may be made to reasonably accommodate individuals with disabilities.)

ACTIVITY	AMC	OUNT OF T SPENT ON			FUNCTION	
	NONE	UP TO 1/3	1/3 TO 2/3	MORE THAN 2/3	Essential	Non Essential
Standing on hard surfaces	x	D	D	Ľ	Ŭ	x
Distinguishing all shades/hues/variations of colors	x					x
Walking	x	U	U	ĽI.	U	x
Sitting	x	Q	Ľ		D	x
Twisting	x	П	M	п	П	x
Stooping	x	Ш	U	Ц	11	x
Crouching	x	D		D	0	x
Crawling	x	П	Π	CI	П	x
Talking	D		x			x
Hearing	Π		x	.[]	Π	x
Reaching	Ц	x	Ľ	Ľ	13	x
Seeing			۵	x	ti	x
Balancing	x	17	Π	.CT	II.	x
Pushing up tolbs.	x	Ē	U	<u>L</u>	D	x
Pulling up tolbs.	x	- D	П	D		x
Grasping	x	L	U.	Ш	[]	x
Lifting or carrying up to15_lbs.	x			0		x
Feeling	x	п	Π	Ľ1	0	x

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# JOB DESCRIPTION

CONFIDENTIAL

PROPRIETARY	JOB D	DESCR	JOB DESCRIPTION						
Motion	x	П				x			
Precise hand movements	x	D	Π	Ð		x			
Reasoning or problem solving	Ц	IJ	U	x	x				
Reading	D	Ø	Ŭ	x	x				
Writing	11	Ð	Ц	x	x	0			
Performing math calculations				x	x				
Adhering to deadlines under pressure	П	D	C)	Х	x				
Learning or retaining technical information	Ľ	П	0	Х	x	П.			
Interacting with customers or visitors		x		Q	x	Π			

## APPLICABLE WORKING CONDITIONS

Please check the appropriate box to indicate the applicable working conditions.

WORKING CONDITIONS	I	AMOUNT O	F TIME TYPI	CALLY SPEN	T ON ACTIVI	TY
	DAILY	WEEKL Y	MONTHL Y	1-4 TIMES A YEAR	RARELY	NEVER
Inside work: protected from weather conditions	X	П	П		D	0
Outside work: no effective protection from weather		D		D.		x
Both inside and outside work: activities occur both inside and outside an enclosed office/building	D	X		D	x	0
Extreme cold: below 32 degrees for periods of more than 1 hour	П	D	1	Π	11	x
Extreme heat: above 100 degrees for periods of more than 1 hour	D	D		0		x
Noise: employees must shout to be heard over ambient noise level (hearing protection required)	Д	Π	Π	n	EI.	x
Vibration: exposure to oscillating movements of extremities or whole body				D		x
Potential hazards: moving parts, electricity, gas, scaffolding, chemicals, etc.	Û,	L	L	Ц	Ú	x
Terminal viewing: extended viewing of screens	x	D	Q	0	G	Ū
Atmospheric conditions (in non-confined spaces): fumes, odors, mists, gases, poor ventilation, etc.	П	Ľ	0	D		x
Oils: air and/or skin exposure to oils and other cutting fluids	П	D	D	П	E)	x
Respirator: the employee is required to wear a respirator	E	0	ū	<u>a</u>	D	x
Physical stamina: due to emergency or work load demands, subject to extended work hours requiring stamina beyond normal demands or levels			Ū	٥	Ū	x
None: employee is NOT substantially exposed to adverse	x	Π	11	п	- 0	0

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# PROPRIETARY JOB DESCRIPTION CONFIDENTIAL environmental conditions (work occurs in typical office or administrative environment) Image: Confident administrative environment Image: Confident administrative enviter Image: Confident administrative environment

**NOTE:** This job description is not intended to be all-inclusive. Employee may perform other duties as required to meet the ongoing needs of the organization

**Employee Signature** 

Date



# JOB DESCRIPTION

# CONFIDENTIAL

JOB TITLE:	Driver II Over the Road	INCENTIVE ELIGIBLE:	No
JOB FAMILY:	Transportation	CAR ALLOWANCE:	No
JOB FUNCTION:	Pick up and delivery	<b>REPORTS TO:</b>	Manager /Supervisor/Operator
JOB CODE:	100332	PAY GRADE:	<u>\$</u>
FLSA:	Non exempt hourly	JOB LOCATION:	Varies nationwide
DATE PREPARED:	July 11, 2007	DEPARTMENT:	Transportation
DATE REVISED:		DIVISION:	ESD/ISD

#### **JOB SUMMARY:**

Delivers hazardous and non-hazardous industrial waste materials and products to and from destination driving company vehicles in accordance with DOT regulations and PSC policies, practices, and procedures.

#### PRINCIPAL DUTIES AND RESPONSIBILITIES:

- Drives company vehicles to transport hazardous & no-hazardous industrial waste materials and products.
- Inspects hoses, pumps, truck and trailer equipment & supplies such as tires, lights, brakes, gas, oil & water.
- · Completes service receipts & related paperwork for work performed and submits to management
- · Obeys all traffic laws and regulations when operating and driving company vehicle
- Installs, operates & repairs mechanical devices such as Pumps, valves, burners, conveyors, etc.
- · Troubleshoots equipment and makes minor repairs.
- Wears prescribed personal protective equipment as indicted by posted signage, established operating procedures, and/or written instructions.
- Reports all accidents, near misses and/or injuries involving self and/or company vehicles/equipment.
- Recommends changes & improvements to services provided based on job experience & observations.
- Runs truck in plant
- Secures loaded material for transportation.
- Shovels, rakes, lifts, and climbs (could go on the Working Conditions/Environmental Conditions check list)
- Shuts down and restarts job equipment
- Takes calls nights and weekends
- Loads and unloads hazardous & non-hazardous waste materials and products. Labels, marks and manifests shipments in accordance with applicable regulations and PSC policies, practices and procedures.
- · Interacts with customer regarding job status and client requirements
- Operates all equipment for specific task, job, process
- · Maintains log of operations and records meter and gauge readings such as circulation and air monitoring, etc.
- Maintains vehicle logs according to government regulations including inspecting truck equipment and supplies such as tires, lights, brakes, gas, oil and water.
- Performs other duties as assigned.

#### TRAINING:

All required local training

#### EDUCATION/CREDENTIALS:

- CDL
- Compliance with MVR policy
- Compliance with Drug policy
- Compliance with Background checking policy
- Compliance with DOT physical requirements

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with federal law and complies with applicable state and local laws prohibiting discrimination in employment in every jurisdiction in which it maintains facilities. C:\Documents and Settings\amorta\My Documents\PSC MOST CURRENT MAY2010\PSC Information\job descriptions\Driver\_II\_-\_OTR.doc



# JOB DESCRIPTION

CONFIDENTIAL

- Possess BASIC Safety Council Reciprocal Card
- Possess all required I-9 documentation

#### JOB RELATED EXPERIENCE:

• 1 year or more Safe Operation of all equipment and tasks that make up service line job processes

#### DEMONSTRATED KNOWLEDGE, SKILLS AND ABILITIES:

- Ability to conform to work hours
- Operational knowledge of tools, equipment and tasks in job processes

#### WORKING ENVIRONMENT:

- On Call 24/7
- Ability to report to work within one hour of receiving call to work.
- Ability to lift a minimum of 50 lbs.

#### ESSENTIAL ABILITIES AND WORKING CONDITIONS

#### Environmental Demands

Please place a check mark in the appropriate box to indicate the physical and mental demands of this position: (Modifications may be made to reasonably accommodate individuals with disabilities.)

ACTIVITY	AN	MOUNT OF TI	FUNCTION			
	NONE	UP TO 1/3	1/3 TO 2/3	MORE THAN 2/3	Essential	Non Essential
Standing on hard surfaces			Q			
Distinguishing all shades/hues/variations of colors			۵	П	D	
Walking	0		D	x	x	
Sitting				0		
Twisting		D	D	x	X	
Stooping				x	X	۵
Crouching				X	x	
Crawling				x	X	D
Talking	D	D	D	x	X	D
Hearing		0	0	x	X	D
Reaching	0	D	0	X	x	
Seeing				X	X	
Balancing				x	x	
Pushing up to100lbs.		D		x	x	
Pulling up to100lbs.		a	D	x	X	Ö

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PROPRIETARY		JOB DESC		CONFIDENTIAL		
Grasping		٥		Х	X	
Lifting or carrying up to _100 lbs.	0			Х	X	۵
Feeling				х	X	۵
Motion				X	X	D
Precise hand movements		0			0	D
Reasoning or problem solving		0		x	X	D
Reading	D	D		X	X	
Writing		D		x	X	۵
Performing math calculations		X		0		
Adhering to deadlines under pressure			0	х	x	
Learning or retaining technical information			0	x	X	
Interacting with customers or visitors			0	x	X	۵

#### APPLICABLE WORKING CONDITIONS

#### Please check the appropriate box to indicate the applicable working conditions.

WORKING CONDITIONS	AMOUNT OF TIME TYPICALLY SPENT ON ACTIVITY									
	DAILY	WEEKLY	MONTHLY	1 – 4 TIMES A YEAR	RARELY	NEVER				
Inside work: protected from weather conditions					D					
Outside work: no effective protection from weather	x	0	۵		0					
Both inside and outside work: activities occur both inside and outside an enclosed office/building		D		۵						
Extreme cold: below 32 degrees for periods of more than 1 hour				D	٥					
Extreme heat: above 100 degrees for periods of more than 1 hour	x					П				
Noise: employees must shout to be heard over ambient noise level (hearing protection required)	x		D	0	Π					
Vibration: exposure to oscillating movements of extremities or whole body	x	D	D	0	۵					
Potential hazards: moving parts, electricity, gas, scaffolding, chemicals, etc.	x		D			D				
Terminal viewing: extended viewing of screens				0						
Atmospheric conditions (in non-confined spaces): fumes, odors, mists, gases, poor ventilation, etc.	x	D		D D						
Oils: air and/or skin exposure to oils and other cutting fluids	x			0						
Respirator: the employee is required to wear a respirator	x					۵				
Enclosed Spaces: the employee is required to work within confined enclosed spaces	x									

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PROPRIETARY	JOB DES	CONFIDENTIAL				
Physical stamina: due to emergency or work load demands, subject to extended work hours requiring stamina beyond normal demands or levels	X		Q		x	
None: employee is NOT substantially exposed to adverse environmental conditions (work occurs in typical office or	D	a	D	۵	D	
administrative environment) NOTE: This job description is not intended to be all-inclusive. En	nployee may pe	rform other duti	es as required to m	neet the ongoing	needs of the orga	anization

Manager Signature

Date

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# JOB DESCRIPTION

## CONFIDENTIAL

JOB TITLE:	Driver-Over the Road III (OTR)	INCENTIVE ELIGIBLE:	No
JOB FAMILY:	Transportation	CAR ALLOWANCE:	No
JOB FUNCTION:	Transport Industrial Waste	<b>REPORTS TO:</b>	Manager /Supervisor/Operator
JOB CODE:	100333	PAY GRADE:	TBD
FLSA:	Non exempt	JOB LOCATION:	Varies
DATE PREPARED:	July 11, 2007	DEPARTMENT:	Transportation
DATE REVISED:		DIVISION:	ESD, ISD

#### JOB SUMMARY:

Delivers hazardous and non-hazardous industrial waste materials and products to and from destination driving company vehicles in accordance with DOT regulations and PSC policies, practices, and procedures.

#### PRINCIPAL DUTIES AND RESPONSIBILITIES:

- Drives company vehicles to transport hazardous & no-hazardous industrial waste materials and products.
- Inspects hoses, pumps, truck and trailer equipment & supplies such as tires, lights, brakes, gas, oil & water.
- Completes service receipts & related paperwork for work performed and submits to management
- Obeys all traffic laws and regulations when operating and driving company vehicle
- Installs, operates & repairs mechanical devices such as Pumps, valves, burners, conveyors, etc.
- Troubleshoots equipment and makes minor repairs.
- Wears prescribed personal protective equipment as indicted by posted signage, established operating procedures, and/or written instructions.
- Reports all accidents, near misses and/or injuries involving self and/or company vehicles/equipment.
- Recommends changes & improvements to services provided based on job experience & observations.
- Runs truck in plant
- Secures loaded material for transportation.
- Shovels, rakes, lifts, and climbs (could go on the Working Conditions/Environmental Conditions check list)
- Shuts down and restarts job equipment
- Takes calls nights and weekends
- Loads and unloads hazardous & non-hazardous waste materials and products. Labels, marks and manifests shipments in accordance with applicable regulations and PSC policies, practices and procedures.
- Interacts with customer regarding job status and client requirements
- Operates all equipment for specific task, job, process
- Maintains log of operations and records meter and gauge readings such as circulation and air monitoring, etc.
- Maintains vehicle logs according to government regulations including inspecting truck equipment and supplies such as tires, lights, brakes, gas, oil and water.
- Performs other duties as assigned.

#### **REQUIREMENTS:**

- TRAINING:
  - All required local training

#### EDUCATION/CREDENTIALS:

- CDL
- Compliance with MVR policy
- Compliance with Drug policy
- Compliance with Background checking policy
- Compliance with DOT physical requirements

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JOB DESCRIPTION

# PROPRIETARY

## Possess BASIC Safety Council Reciprocal Card

Possess all required I-9 documentation

#### JOB RELATED EXPERIENCE:

4 or more years of Safe Operation of all equipment and tasks that make up service line job processes

#### DEMONSTRATED KNOWLEDGE, SKILLS AND ABILITIES:

- Ability to conform to work hours
- Operational knowledge of tools, equipment and tasks in job processes

#### WORKING ENVIRONMENT:

- On Call 24/7
- Ability to report to work within one hour of receiving call to work.
- Ability to lift a minimum of 50 lbs.

#### ESSENTIAL ABILITIES AND WORKING CONDITIONS

#### Environmental Demands

# Please place a check mark in the appropriate box to indicate the physical and mental demands of this position: (Modifications may be made to reasonably accommodate individuals with disabilities.)

ACTIVITY	AN	10UNT OF TI	LY SPENT ON	FUNCTION		
	NONE	UP TO 1/3	1/3 TO 2/3	MORE THAN 2/3	Essential	Non Essential
Standing on hard surfaces	D	۵		Ũ		
Distinguishing all shades/hues/variations of colors		٥	۵	0		
Walking				П	x	
Sitting	0	D	0	0		
Twisting	0	0	0	D	x	
Stooping		۵	D		x	0
Crouching		0	Ŭ	0	x	
Crawling		D			X	۵
Talking	0				x	
Hearing		۵	D	D	X	
Reaching					X	
Seeing	0	0			X	D
Balancing			D	D	X	D
Pushing up to1001bs.		٥			X	
Pulling up to100lbs.	0	D		0	x	0

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# CONFIDENTIAL



PROPRIETARY		JOB DESC	JOB DESCRIPTION					
Grasping		Π		۵	X	0		
Lifting or carrying up to _100 lbs.				۵	X			
Feeling				0	X	Д		
Motion		0		D	x			
Precise hand movements	D		D					
Reasoning or problem solving					X			
Reading					X	۵		
Writing			П		X	۵		
Performing math calculations	D	x		0	D	D		
Adhering to deadlines under pressure	D				x			
Learning or retaining technical information	D	0	0		x	٥		
Interacting with customers or visitors		D	0	۵	x	0		

# APPLICABLE WORKING CONDITIONS

#### Please check the appropriate box to indicate the applicable working conditions.

WORKING CONDITIONS	A	MOUNT OF	TIME TYPIC	ALLY SPENT O	ON ACTIVIT	ſΥ
	DAILY	WEEKLY	MONTHLY	1 – 4 TIMES A YEAR	RARELY	NEVER
Inside work: protected from weather conditions			0		D	
Outside work: no effective protection from weather	x			D	٥	
Both inside and outside work: activities occur both inside and outside an enclosed office/building	П		٥		D	D
Extreme cold: below 32 degrees for periods of more than 1 hour					D	
Extreme heat: above 100 degrees for periods of more than 1 hour	x		D			
Noise: employees must shout to be heard over ambient noise level (hearing protection required)	x	D	0		٥	
Vibration: exposure to oscillating movements of extremities or whole body	x		D	D		D
Potential hazards: moving parts, electricity, gas, scaffolding, chemicals, etc.	x			D		
Terminal viewing: extended viewing of screens	D	D	D	0	۵	
Atmospheric conditions (in non-confined spaces): fumes, odors, mists, gases, poor ventilation, etc.	x		D	0		
Oils: air and/or skin exposure to oils and other cutting fluids	x				۵	
Respirator: the employee is required to wear a respirator	x					D
Enclosed Spaces: the employee is required to work within confined enclosed spaces	x				٥	

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	1-	-1		
				8

PROPRIETARY	JOB DES	CONFIDENTIAL			
Physical stamina: due to emergency or work load demands, subject to extended work hours requiring stamina beyond normal demands or levels	x	D		x	
None: employee is NOT substantially exposed to adverse environmental conditions (work occurs in typical office or administrative environment)	0	0			

**NOTE:** This job description is not intended to be all-inclusive. Employee may perform other duties as required to meet the ongoing needs of the organization

**Employee Signature** 

Manager Signature

Date

Date

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# JOB DESCRIPTION

# CONFIDENTIAL

JOB TITLE:	Environmental Technician 1	INCENTIVE ELIGIBLE:	No
JOB FAMILY:	Hazardous Materials Handling	CAR ALLOWANCE:	No
JOB FUNCTION:	Plant material storage & shipping	REPORTS TO:	Varies
JOB CODE:	100363	PAY GRADE:	
FLSA:	Non Exempt	JOB LOCATION:	various
DATE PREPARED:	March 13, 2009	DEPARTMENT:	various
DATE REVISED:		DIVISION:	Environmental

#### **JOB SUMMARY:**

Under general supervision, performs routine and frequent manual and heavy labor tasks to properly treat, store, pack, transport and/or dispose of hazardous waste in accordance with environmentally responsible and cost effective practices and PSC policies, practices and procedures.

#### PRINCIPAL DUTIES AND RESPONSIBILITIES:

- Consolidates material for shipped for off-site treatment.
- Completes paperwork properly and timely.
- May assist in maintaining inventory and storage of hazardous materials in accordance with appropriate regulations and PSC policies, practices, and procedures.
- Follows and understands all Health & Safety /Job Safety Analysis (JSA's) procedures as outlined in the PSC procedures and policies.
- Operates fork trucks to move materials for storage and loading and unloading.
- Collects samples of inbound waste for analysis.
- Performs other duties as assigned.

#### SCOPE:

#### **MEASURES OF PERFORMANCE:**

EDUCATION/CREDENTIALS:

High school diploma or equivalent

JOB RELATED EXPERIENCE:

0-2 years

## DEMONSTRATED KNOWLEDGE, SKILLS AND ABILITIES:

- Attention to detail
- Ability to follow procedures
- Safe driving

#### WORKING ENVIRONMENT:

Plant environment

#### ENVIRONMENTAL REQUIREEMENTS

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# JOB DESCRIPTION

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#### ESSENTIAL ABILITIES AND WORKING CONDITIONS

Please place a check mark in the appropriate box to indicate the physical and mental demands of this position: (Modifications may be made to reasonably accommodate individuals with disabilities.)

ACTIVITY	accommodate AMC	UNT OF T SPENT ON	IME TYP	PICALLY	FUNCTION	
	NONE	UP TO 1/3	1/3 TO 2/3	MORE THAN 2/3	Essential	Non Essentia
Standing on hard surfaces	ĽI,	Ľ	U	x	x	D
Distinguishing all shades/hues/variations of colors			x	D	x	
Walking	D	Ľ	x	D	x	
Sitting	D	x			x	
Twisting	x	.0	П	П		x
Stooping	0	x	Ľ	Ц	x	0
Crouching	D	x		D	x	
Crawling	x	D	۵			x
Talking		x	П	.[]	x	
Hearing	Π	п	x	П	x	0
Reaching	D	x	Ц	Ľ.	x	0
Seeing		Ū		x	x	
Balancing	x	Ω	Гі	П	Π	x
Pushing up to20lbs.	Ū.	x	Ľ	Ľ	x	
Pulling up to20 lbs.	Π	x	Π	П	x	
Grasping	<u>с</u>	x	Ū		x	
Lifting or carrying up to _20_lbs.		x	П	0	x	Q
Feeling	x	U.	D	(')	x	
Motion	<u>[]</u>	x	D		x	D
Precise hand movements		Д	x	۵	x	D
Reasoning or problem solving	Ц.	x	П_	Q	x	<u>U</u>
Reading		x			x	
Writing	0	x	E)	Ū	x	
Performing math calculations	0	x	Ĺj	EL.	x	۵
Adhering to deadlines under pressure		x		0	x	
Learning or retaining technical information	D	Ū	x	ti	x	
Interacting with customers or visitors		x		0	x	

#### APPLICABLE WORKING CONDITIONS

Please check the appropriate box to indicate the applicable working conditions.						
AMOUNT OF TIME TYPICALLY SPENT ON ACTIVITY						

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PROPRIETARY		ESCRIP	CONFIDEN			
	DAILY	WEEKL Y	MONTHL Y	1-4 TIMES A YEAR	RARELY	NEVER
Inside work: protected from weather conditions	x	IJ	11	0	[]	
Outside work: no effective protection from weather	Ц	x	11	L)	Ú	D
Both inside and outside work: activities occur both inside and outside an enclosed office/building	x				۵	D
Extreme cold: below 32 degrees for periods of more than 1 hour	ĽI.	Ц	U	Ц	x	Ц
Extreme heat: above 100 degrees for periods of more than 1 hour	Ľ	11	IJ	Ц	x	Щ
Noise: employees must shout to be heard over ambient noise level (hearing protection required)	11	Ľ1	- U	E	x	
Vibration: exposure to oscillating movements of extremities or whole body	п	ŢĨ.	П	D	Ľ)	x
Potential hazards: moving parts, electricity, gas, scaffolding, chemicals, etc.	17).	П	ti -	П	х	Ū
Terminal viewing: extended viewing of screens		П	Π	П	- A	x
Atmospheric conditions (in non-confined spaces): fumes, odors, mists, gases, poor ventilation, etc.	Π		n	ŋ	x	П
Oils: air and/or skin exposure to oils and other cutting fluids	[]	Π	门	T	x	E
Respirator: the employee is required to wear a respirator			G	x		1
Physical stamina: due to emergency or work load demands, subject to extended work hours requiring stamina beyond normal demands or levels	Ľ	х	Ľ.	D		0
Confined Areas: employee is required to work in confined areas				x		
None: employee is NOT substantially exposed to adverse environmental conditions (work occurs in typical office or administrative environment)		Ó			x	

**Employee Signature** 

Date

Manager Signature

Date

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# JOB DESCRIPTION

## CONFIDENTIAL

JOB TITLE:	Environmental Technician II	INCENTIVE ELIGIBLE:	No
JOB FAMILY:	Hazardous Materials Handling	CAR ALLOWANCE:	No
JOB FUNCTION:	Plant material storage & shipping	REPORTS TO:	Manager/Supervisor
JOB CODE:	100364	MARKET PAY RANGE:	
FLSA:	Non Exempt	JOB LOCATION:	various
DATE PREPARED:	March 13, 2009	DEPARTMENT:	Plant/Facility
DATE REVISED:		DIVISION:	ESD

#### JOB SUMMARY:

Under general supervision, performs routine and frequent manual and heavy labor tasks to properly treat, store, pack, transport and/or dispose of hazardous waste in accordance with environmentally responsible and cost effective practices and PSC policies, practices and procedures.

# PRINCIPAL DUTIES AND RESPONSIBILITIES:

- · Consolidates material for shipped for off-site treatment.
- · Completes paperwork properly and timely.
- May assist in maintaining inventory and storage of hazardous materials in accordance with appropriate regulations and PSC policies, practices, and procedures.
- Follows and understands all Health & Safety /Job Safety Analysis (JSA's) procedures as outlined in the PSC procedures and policies.
- Operates fork trucks to move materials for storage and loading and unloading.
- Collects samples of inbound waste for analysis.
- May maintain records for DOT and State officials.
- Operates fork trucks and heavy duty equipment.
- · Performs other duties as assigned.

#### EDUCATION/CREDENTIALS:

- High school diploma or equivalent
- Fork lift operation certification

#### JOB RELATED EXPERIENCE:

2-4 years

#### DEMONSTRATED KNOWLEDGE, SKILLS AND ABILITIES:

- · Attention to detail
- Ability to follow procedures
- Safe driving record
- Operating Fork lift/trucks and heavy equipment

#### WORKING ENVIRONMENT:

 Plant environment 100364

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# JOB DESCRIPTION

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100364

#### ENVIRONMENTAL REQUIREEMENTS

ESSENTIAL ABILITIES AND WORKING CONDITIONS

Please place a check mark in the appropriate box to indicate the physical and mental demands of this position: (Modifications may be made to

ACTIVITY	y accommodate i AMC	UNT OF T SPENT ON	IME TYF	PICALLY	FUNCTION		
	NONE	UP TO 1/3	1/3 TO 2/3	MORE THAN 2/3	Essential	Non Essential	
Standing on hard surfaces			Q	x	x		
Distinguishing all shades/hues/variations of colors	D		x	D	x		
Walking	Cl	<u>(</u> ])	x	Ц	x		
Sitting		x	Π		x		
Twisting	x	U	Ľ	11	Ц	x	
Stooping	D	x		Û	x		
Crouching	()	x	D	C	x	Ű.	
Crawling	x	Ľ	Ľl			x	
Talking		x		D	x		
Hearing	0		x	Ű	x	E	
Reaching	<u>D</u>	x		D	x		
Seeing	Д	Π	П	x	x		
Balancing	x	Ľ	Ľ	U	D	x	
Pushing up tolbs.	0	x	۵	D	x	0	
Pulling up to20 lbs.		x	П	П	x		
Grasping	D	x		D	x	0	
Lifting or carrying up to _20_lbs.	П	x			x		
Feeling	x	Ш	D.	1	x	D	
Motion		x	Π	Д	x	П	
Precise hand movements	Π	Ω	x	ņ	x	0	
Reasoning or problem solving	0	x	Ш	<u>U</u>	x	Ľ	
Reading	n	x	D	(")	x	Ū	
Writing	Ü	x	U	(1	x	D	
Performing math calculations	- C	x		D	x		
Adhering to deadlines under pressure	q	x	ŕı	n	x	П	
Learning or retaining technical information	Ľ	IJ	x	Û	x	0	
Interacting with customers or visitors	1	x	0		x		

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## JOB DESCRIPTION

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WORKING CONDITIONS	e box to indicate the applicable working conditions. AMOUNT OF TIME TYPICALLY SPENT ON ACTIVITY							
	DAILY	WEEKL Y	MONTHL Y	1-4 TIMES A YEAR	RARELY	NEVER		
Inside work: protected from weather conditions	X	EI .	n					
Outside work: no effective protection from weather	$[\Gamma_i]$	x	- M		Π	Ū.		
Both inside and outside work: activities occur both inside and outside an enclosed office/building	x	Ц		E)	Ē	D		
Extreme cold: below 32 degrees for periods of more than 1 hour		П		Π	x	۵		
Extreme heat: above 100 degrees for periods of more than 1 hour	П	П	П	Π	x	۵		
Noise: employees must shout to be heard over ambient noise level (hearing protection required)	П	П	П	- T	x	E.		
Vibration: exposure to oscillating movements of extremities or whole body	D	D	D	D.		x		
Potential hazards: moving parts, electricity, gas, scaffolding, chemicals, etc.	D		D	13	x			
Terminal viewing: extended viewing of screens	0	E	G	Ē	D	x		
Atmospheric conditions (in non-confined spaces): fumes, odors, mists, gases, poor ventilation, etc.			Ш	Ū	x			
Oils: air and/or skin exposure to oils and other cutting fluids	G		П	D	x	1		
Respirator: the employee is required to wear a respirator	Ū	D		x	D			
Physical stamina: due to emergency or work load demands, subject to extended work hours requiring stamina beyond normal demands or levels		x	D)	Ū	E			
Confined Areas: employee is required to work in confined areas				x				
None: employee is NOT substantially exposed to adverse environmental conditions (work occurs in typical office or administrative environment)	Ľ		ĽI.	Ц	x	D		

**Employee Signature** 

Date

Manager Signature

Date

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# JOB DESCRIPTION

# CONFIDENTIAL

JOB TITLE:	Environmental Technician III	INCENTIVE ELIGIBLE:	No
JOB FAMILY:	Hazardous Materials Handling	CAR ALLOWANCE:	No
JOB FUNCTION:	Plant material storage & shipping	REPORTS TO:	Manager/Supervisor
JOB CODE:	100365	MARKET PAY RANGE:	
FLSA:	Non Exempt	JOB LOCATION:	various
DATE PREPARED:	March 13, 2009	DEPARTMENT:	Plant/Facility
DATE REVISED:		DIVISION:	ESD

#### JOB SUMMARY:

Under general supervision, performs routine and frequent manual and heavy labor tasks to properly treat, store, pack, transport and/or dispose of hazardous waste in accordance with environmentally responsible and cost effective practices and PSC policies, practices and procedures.

## PRINCIPAL DUTIES AND RESPONSIBILITIES:

- Consolidates material for shipped for off-site treatment.
- Completes paperwork properly and timely.
- May assist in maintaining inventory and storage of hazardous materials in accordance with appropriate regulations and PSC policies, practices, and procedures.
- Follows and understands all Health & Safety /Job Safety Analysis (JSA's) procedures as outlined in the PSC procedures and policies.
- Operates fork trucks to move materials for storage and loading and unloading.
- Collects samples of inbound waste for analysis.
- May maintain records for DOT and State officials.
- Operates fork trucks and heavy duty equipment.
- Performs other duties as assigned.

#### EDUCATION/CREDENTIALS:

- High school diploma or equivalent
- Fork lift operation certification

#### JOB RELATED EXPERIENCE:

• 4 or more years directly applicable experience

#### DEMONSTRATED KNOWLEDGE, SKILLS AND ABILITIES:

- Attention to detail
- Ability to follow procedures
- Safe driving record
- Operating Fork lift/trucks and heavy equipment

#### WORKING ENVIRONMENT:

 Plant environment 100365

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# JOB DESCRIPTION

CONFIDENTIAL

100364

## ENVIRONMENTAL REQUIREEMENTS

ESSENTIAL ABILITIES AND WORKING CONDITIONS

Please place a check mark in the appropriate box to indicate the physical and mental demands of this position: (Modifications may be made to

ACTIVITY	y accommodate AMC	UNT OF T	IME TYP	ICALLY	FUNCTION		
	NONE	UP TO 1/3	1/3 TO 2/3	MORE THAN 2/3	Essential	Non Essentia	
Standing on hard surfaces	(D	Q		x	x	0	
Distinguishing all shades/hues/variations of colors	П		x		x	П	
Walking	ĽL	Ľ)	x	L]	х	C	
Sitting	Ē	x		Π	x		
Twisting	x	Ľ	U	Ū.		x	
Stooping	Ľ	x		Q	x		
Crouching	Π	x	Ū	D	x		
Crawling	x	D	Ľ	[]	Ц	x	
Talking		x	Ō	П	x		
Hearing	D	Ш	x	D	x		
Reaching		x			x		
Seeing	D	П	(1)	x	x		
Balancing	x	U	C	Ľ	Ľ	x	
Pushing up to20lbs.	0	x	D		x		
Pulling up to20 lbs.	П	x	D	П	x	D	
Grasping	D	x	D	D	x	Ū	
Lifting or carrying up to _20_lbs.	ជ	x	۵	П	x	11	
Feeling	x	IJ	U	Ľ	x	Ľ	
Motion		x	D	0	x	D	
Precise hand movements		Π	x	T I	x	П	
Reasoning or problem solving		x	Ŭ		x		
Reading		x	D	Л	x	Π	
Writing	11	x	Ц	Ľ	x		
Performing math calculations		x	D		x		
Adhering to deadlines under pressure	Π	x	П	[]	x	D	
Learning or retaining technical information	11	LL	x	L	x	0	
Interacting with customers or visitors	0	x	Ø	G	x	0	

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descriptions\Environmental\_Technician\_IIIESD101365.doc



# JOB DESCRIPTION

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Please check the appropriate WORKING CONDITIONS	e box to ind	MOUNT O	E TIME TVPI	CALLY SPEN	T ON ACTIVI	TV
WORKING CONDITIONS	DAILY	WEEKL Y	MONTHL Y	1-4 TIMES A YEAR	RARELY	NEVER
Inside work: protected from weather conditions	x	П	Π		ņ	
Outside work: no effective protection from weather	Π	x	Π		n.	[]
Both inside and outside work: activities occur both inside and outside an enclosed office/building	x	Ц.	Ľ	<u>C</u> r	D	D
Extreme cold: below 32 degrees for periods of more than 1 hour	Π	П	11	Π	x	
Extreme heat: above 100 degrees for periods of more than 1 hour		ņ		П	x	.[]
Noise: employees must shout to be heard over ambient noise level (hearing protection required)	Π	Д	П	11	x	Π
Vibration: exposure to oscillating movements of extremities or whole body	П					x
Potential hazards: moving parts, electricity, gas, scaffolding, chemicals, etc.	0	D			x	
Terminal viewing: extended viewing of screens		Ū.	П			x
Atmospheric conditions (in non-confined spaces): fumes, odors, mists, gases, poor ventilation, etc.	a		D		x	
Oils: air and/or skin exposure to oils and other cutting fluids		۵			x	
Respirator: the employee is required to wear a respirator			Ū	x		
Physical stamina: due to emergency or work load demands, subject to extended work hours requiring stamina beyond normal demands or levels	D	x	Ū	ā		
Confined Areas: employee is required to work in confined areas				x		
None: employee is NOT substantially exposed to adverse environmental conditions (work occurs in typical office or administrative environment) NOTE: This job description is not intended to be all-inc	Ш	Ľ		Ľ	x	Ľ

ongoing needs of the organization

**Employee Signature** 

Date

Manager Signature

Date

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# JOB DESCRIPTION

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JOB TITLE:	Environmental Project Manager 1	INCENTIVE ELIGIBLE:	No
JOB FAMILY:	Hazardous Materials	CAR ALLOWANCE:	No
JOB FUNCTION:	Customer projects	<b>REPORTS TO:</b>	Plant Manager/Facility Manager
JOB CODE:	101250	MARKET PAY RANGE	
FLSA:		JOB LOCATION:	various
DATE PREPARED:	January 26, 2009	DEPARTMENT:	Operations
DATE REVISED:		DIVISION:	Environmental Services

#### JOB SUMMARY:

Manages, coordinates, and may perform various on-site activities to ensure proper treatment and disposal of customers' hazardous waste materials in accordance with environmentally responsible and cost effective practices and PSC policies, practices and procedures.

#### PRINCIPAL DUTIES AND RESPONSIBILITIES:

- Processes hazardous materials including receiving, logging, labeling, segregating, classifying known and unknown materials, waste sampling and profiling, and packaging in accordance with PSC, procedures and practices and all applicable regulations.
- On-site supervisor of supporting personnel.
- Follows, understands, and promotes by example, all Health & Safety /Job Safety Analysis (JSA's) procedures as outlined in the PSC procedures and policies, including development of on-site Health & Safety plans/JSA's.
- On-site customer contact
- Performs waste profiling
- Properly manifests including Land Disposal Restrictions (LDR's) and labels waste materials in accordance with appropriate regulations and procedures.
- Assists Supervisor with "on-site" management of hazardous waste.
- Performs consolidation of Hazardous materials/waste (i.e. bulking, repackaging)
- Performs other duties as assigned.

#### SCOPE:

#### **MEASURES OF PERFORMANCE:**

#### EDUCATION/CREDENTIALS:

 Bachelor of Arts or Science degree in a physical science such as biology, Chemistry, or engineering filed based in physical science such as chemical engineering, environmental engineering, etc.

#### JOB RELATED EXPERIENCE:

- 2 + years Lab Pack experience or similar environmental waste management
- Depack experience

#### DEMONSTRATED KNOWLEDGE, SKILLS AND ABILITIES:

- 40 hour OSHA training completed and current
- Strong working knowledge of Resource Conservation Recovery Act and Department of Transportation regulations
- Department of Transportation (DOT) training current
- CPR, First Aid, and Blood Borne Pathogen training current

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- Developed communication skills to interact with customer to provide information, explanations, and/or instructions.
- Team player
- Attention to detail
- Ability to follow procedures

#### WORKING ENVIRONMENT:

On-site indoor/outdoor working with hazardous waste materials

#### ESSENTIAL ABILITIES AND WORKING CONDITIONS Environmental Demands

Please place a check mark in the appropriate box to indicate the physical and mental demands of this position: (Modifications may be made to reasonably accommodate individuals with disabilities.)

ACTIVITY	AMOUNT OF TIME TYPICALLY SPENT ON ACTIVITY				FUNCTION		
	NON E	UP TO 1/3	1/3 TO 2/3	MORE THAN 2/3	Essential	Non Essential	
Standing on hard surfaces			х	Ľ	х		
Distinguishing all shades/hues/variations of colors	11	Ð	х	[7]	x		
Walking			x		x		
Sitting			x		x		
Twisting		x		11	x		
Stooping		x			x		
Crouching	Ľ	x			x		
Crawling	x			D		x	
Talking			x		x		
Hearing	E	TU	x	D	x	TI	
Reaching		x		0	x		
Seeing	Д			x	x		
Balancing	x	D			D	x	
Pushing up to100lbs.		x			x	D	
Pulling up to100lbs.	11	x	C1	П	x		
Grasping		x	Ū		x		
Lifting or carrying up to _50lbs.		x			x		
Feeling	x	Ľ	[]	11	()	x	
Motion		x		D	x	D	
Precise hand movements	ĽI	<u>[]</u>	x	(1)	x	Ű	

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PROPRIETARY	JUB DESCRIFTION				CONT ID		
Reasoning or problem solving		D		x	х		
Reading			x		x		
Writing			x		x		
Performing math calculations		x	Ò		x	П	
Adhering to deadlines under pressure	D		x	Ē	x		
Learning or retaining technical information	ņ	U.	x	U	x	El	
Interacting with customers or visitors		D	x		x		

# APPLICABLE WORKING CONDITIONS

Please check the appropriate box to indicate the applicable working conditions.

WORKING CONDITIONS	AMOUNT OF TIME TYPICALLY SPENT ON ACTIVITY						
	DAIL Y	WEEK LY	MONTHL Y	1 – 4 TIMES A YEAR	RARELY	NEVER	
Inside work: protected from weather conditions	x						
Outside work: no effective protection from weather		x					
Both inside and outside work: activities occur both inside and outside an enclosed office/building	x	01	11	11	Ĺ	[.]	
Extreme cold: below 32 degrees for periods of more than 1 hour				X	Ш		
Extreme heat: above 100 degrees for periods of more than 1 hour				x			
Noise: employees must shout to be heard over ambient noise level (hearing protection required)	11	n	11	U	х	П	
Vibration: exposure to oscillating movements of extremities or whole body			П	Ø		x	
Potential hazards: moving parts, electricity, gas, scaffolding, chemicals, etc.					х		
Terminal viewing: extended viewing of screens					X		
Atmospheric conditions (in non-confined spaces): fumes, odors, mists, gases, poor ventilation, etc.	C)	EJ	[1	19	x		
Oils: air and/or skin exposure to oils and other cutting fluids					x		
Respirator: the employee is required to wear a respirator		D	<u> </u>	x		0	
Physical stamina: due to emergency or work load demands, subject to extended work hours requiring stamina beyond normal demands or levels	Ц	1.1	X	[]	ŢŢ.	t.i	
None: employee is NOT substantially exposed to adverse environmental conditions (work occurs in typical office or administrative environment)		[]	11		x	<u>іЦ</u> .	

NOTE: This job description is not intended to be all-inclusive. Employee may perform other duties as required to meet the ongoing needs of the organization

**Employee Signature** 

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Date

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JOB DESCRIPTION

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Manager Signature

Date

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JOB TITLE:

JOB CODE:

PREPARED:

DATE REVISED:

FLSA:

DATE

JOB FAMILY:

JOB FUNCTION:

### JOB DESCRIPTION

INCENTIVE ELIGIBLE:

CAR ALLOWANCE:

**REPORTS TO:** 

PAY GRADE:

JOB LOCATION:

DEPARTMENT:

DIVISION:

	-					
No			 			
Ma	nag	er –			-	_
			-	-		

various

various

Environmental

### JOB SUMMARY:

Under immediate supervision, performs various assigned tasks and physical labor to ensure proper off-site treatment and disposal of customers' hazardous waste materials in accordance with environmentally responsible and cost effective practices and PSC policies, practices and procedures.

### PRINCIPAL DUTIES AND RESPONSIBILITIES:

- Processes hazardous materials including receiving, logging, labeling, segregating, classifying known and unknown materials, waste sampling and profiling, and packaging in accordance with Lab Pack policies, procedures and practices and all applicable regulations.
- Properly manifests including Land Disposal Restrictions (LDR's) and labels waste materials in accordance with appropriate . regulations and procedures.
- Transports personnel and waste to and from customers job locations. .

**Environmental Specialist** 

**Hazardous** Materials

Non exempt - Salaried

Lab Pack

May 23, 2007

100025

- Follows, understands, and promotes by example, all Health & Safety /Job Safety Analysis (JSA's) procedures as outlined in the PSC Lab Pack procedures and policies, including development of on-site Health & Safety plans/JSA's.
- Maintains Commercial Driver's License (CDL) with Hazmat Endorsement to legally operate the local PSC vehicles necessary for . transporting personnel and waste to and from customers' job locations.
- Provides support to the Depack, Retail and HHW groups both internally or On-site as needed.
- Performs consolidation of Hazardous materials/waste (i.e. bulking, repackaging)
- Performs other duties as assigned.

### SCOPE:

### **MEASURES OF PERFORMANCE:**

- Completion of the following curriculum:
- 40 hour OSHA Refresher (29 CFR 1910.120)
- Acquisition of Commercial Driver's License (B or C) with Hazmat Endorsement
- PSC Lab Pack I Lab Pack Training (24 hours)
  - RCRA/DOT refresher course .
  - Department of Transportation .
  - PSC Lab Pack definitions and procedures
  - Lab pack Tabletop .
  - Introduction to High Hazardous Cylinder Assessment course
  - Customer Interactions course
  - Waste Management Methods course
  - **On-Site Expectations** .
  - a, Manifest/ LDR course
  - Health & Safety course(s)
  - Customer Approach
- 40 hours Depack Experience
- Local Facility Capabilities
- 8 hours DOT Training

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### CONFIDENTIAL



### JOB DESCRIPTION

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- CPR/First Aid/Blood-borne Pathogen training
- State regulations (if applicable)
- All required local training

### EDUCATION/CREDENTIALS:

- 4 year college degree in area of General Science or equivalent experience
- Drivers License with clear record

### JOB RELATED EXPERIENCE:

0-2 years

### DEMONSTRATED KNOWLEDGE, SKILLS AND ABILITIES:

- Strong communication skills to interact with customer to provide information, explanations, and/or instructions.
- Team player
- Attention to detail
- Ability to follow procedures

### WORKING ENVIRONMENT:

- Customer sites, plant, labs
- Indoor/Outdoor

100025

### Environmental Demands ESSENTIAL ABILITIES AND WORKING CONDITIONS

Please place a check mark in the appropriate box to indicate the physical and mental demands of this position: (Modifications may be made to

ACTIVITY	AMO	UNT OF T SPENT ON	FUNCTION			
	NONE	UP TO 1/3	1/3 TO 2/3	MORE THAN 2/3	Essential	Non Essential
Standing on hard surfaces	Ľ	D	x	Û	x	D
Distinguishing all shades/hues/variations of colors			x	D	x	
Walking		n	x	D.	x	()
Sitting			x		x	
Twisting	El	x	Π	1	x	
Stooping	U	x	Ľ.	13	x	D
Crouching		x	۵		x	
Crawling	x	n	n	17	Л	x
Talking	Ľ	U	x	Ti -	x	Ľ
Hearing			x		x	Π
Reaching	D.	x	U	Ľ	x	ĽÚ.

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L	-		

PROPRIETARY	JOB	DESCR	IPTION		CONFIDENTIA		
Seeing		Ē		x	x		
Balancing	x	E)		<u>, </u>		x	
Pushing up to100lbs.	U I	x		U	x		
Pulling up to100lbs.	D	x			x	۵	
Grasping	Ŭ	x	U	[]	x		
Lifting or carrying up to50_lbs.	α	x	D		x	a	
Feeling	x	D				x	
Motion	0	x		Ð	x	D	
Precise hand movements	D		x	D	x		
Reasoning or problem solving	Ü	1.1	Ú.	x	x	U)	
Reading		Ū	x	Π	x		
Writing	n	t)	x	D	x		
Performing math calculations	U	x	0	Ü.	x		
Adhering to deadlines under pressure		Ľ	x		x	П	
Learning or retaining technical information	Π	П	x	171	x		
Interacting with customers or visitors		٥	x	a	x	D	

# <u>APPLICABLE WORKING CONDITIONS</u>

WORKING CONDITIONS	I I	MOUNT O	F TIME TYPIC	CALLY SPEN	T ON ACTIVI	TY
	DAILY	WEEKL Y	MONTHL Y	1-4 TIMES A YEAR	RARELY	NEVER
Inside work: protected from weather conditions	x	Ľ	D	Π		
Outside work: no effective protection from weather	(I)	x	П	п		
Both inside and outside work: activities occur both inside and outside an enclosed office/building	x	L]	Π.	n		Π
Extreme cold: below 32 degrees for periods of more than 1 hour	П		Ē	x	Ū.	
Extreme heat: above 100 degrees for periods of more than 1 hour		<u>a</u>		x		Q
Noise: employees must shout to be heard over ambient noise level (hearing protection required)					х	
Vibration: exposure to oscillating movements of extremities or whole body			П			x
Potential hazards: moving parts, electricity, gas, scaffolding, chemicals, etc.	Ľ	Ľ	<u>ц</u>	L	x	
Terminal viewing: extended viewing of screens	U	L)	L)	£1	x	L
Atmospheric conditions (in non-confined spaces): fumes, odors, mists, gases, poor ventilation, etc.	EL	Ц	U	Ľ	x	
Oils: air and/or skin exposure to oils and other cutting fluids	[]	LI.	13	Ľ)	x	1
Respirator: the employee is required to wear a respirator	Ú.	П		x	0	
Physical stamina: due to emergency or work load demands, subject to extended work hours requiring stamina beyond normal demands or levels		x			C)	

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PROPRIETARY	JOB	DESCRIP	TION		C	ONFIDENTIAL
None: employee is NOT substantially exposed to adverse environmental conditions (work occurs in typical office or administrative environment)	0		Ĺ	¥1	x	Γ)

NOTE: This job description is not intended to be all-inclusive. Employee may perform other duties as required to meet the ongoing needs of the organization

**Employee Signature** 

Date

Date

Manager Signature

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### JOB DESCRIPTION

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JOB TITLE:	Operations Manager	INCENTIVE ELIGIBLE:	No
JOB FAMILY:	Management	CAR ALLOWANCE:	No
JOB FUNCTION:	HHW Facility	REPORTS TO:	Operations Management
JOB CODE:	100324	PAY GRADE:	
FLSA:	Exempt	JOB LOCATION:	Varies
DATE PREPARED:	April 1, 2008	DEPARTMENT:	Operations
DATE REVISED:		ESD	ESD

### **JOB SUMMARY:**

Oversees and manages all operations' activities and issues at assigned hazardous waste facility to ensure optimum efficiency and fiscal responsibility in accordance with all applicable regulations and PSC policies, practices, and procedures.

### PRINCIPAL DUTIES AND RESPONSIBILITIES:

- Directly supervises employees including interviewing, hiring, training, planning, assigning, directing work, appraising
  performance, rewarding and disciplining employees, addressing complaints and resolving problems in accordance with
  PSC's HR policies, practices, and procedures.
- · Coordinates and manages group activities and interactions with other divisions
- · Coordinates scheduling of personnel and project assignments
- Conduct and supervise staff meetings.
- Approve all accounts payable / accounts receivable for payment.
- Review monthly Profit and Loss statements and address all applicable discrepancies.
- Forecast revenue.
- QA/QC all specialist work.
- Handles customer service responsibilities for office.
- Enforces or modifies work procedures as needed to ensure a safe and efficient work environment.
- Performs other duties as assigned.

### SCOPE:

- Overall P&L responsibility for facility
- Supervises:
  - o Direct Environmental Specialists

### **MEASURES OF PERFORMANCE:**

- Profitability as reflected in EBITDA
- Labor utilization

### EDUCATION/CREDENTIALS:

Bachelor's degree (B. A.) from four-year college or university.

### CERTIFICATES, LICENSES, CERTIFICATIONS

- 80 hour OSHA Training with 8 hour refresher course
- Current CPR/First Aid Certification
- Current Driver's License
- Forklift Training

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### JOB DESCRIPTION

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- Bloodborne Pathogen Training
- DOT HM 181/126F Training

### JOB RELATED EXPERIENCE:

 2 – 3 years experience in industrial services, program or business management or combination of education and experience.

### DEMONSTRATED KNOWLEDGE, SKILLS AND ABILITIES:

- Working knowledge of safety, engineering and other regulatory issues as they relate to facilities, i.e., OSHA regulations, fire codes, etc.
- Strong financial planning, budgeting and forecasting skills. Knowledge of recognized accounting practice and ability to read financial statements.
- Exceptional Communication skills both verbal and written
- Performs arithmetic calculations including multiplication, division, addition, subtraction, ratios and percentages
- Strong user of PC and software applications
- Report preparation
- Effective leadership qualities
- · Multi-tasking to process competing demands with multiple deadlines
- · Adaptability to dynamic environment with calmness and good judgment
- · Compile data from multiple sources
- Proficiency with computers and with Microsoft applications of Word and Excel
- Research and analyze issues and recommend solutions
- Sound decision making impacting operations and customers
- · Effective oral and written communication skills
- Effective Project management skills

### WORKING ENVIRONMENT:

• Inside and outside

### ESSENTIAL ABILITIES AND WORKING CONDITIONS Environmental Demands

Please place a check mark in the appropriate box to indicate the physical and mental demands of this position: (Modifications may be made to reasonably accommodate individuals with disabilities.)

ACTIVITY	AMOUN	NT OF TI ENT ON	FUNCTION			
	NONE	UP TO 1/3	1/3 TO 2/3	MORE THAN 2/3	Essential	Non Essential
Standing on hard surfaces	D	x	۵		D	۵
Distinguishing all shades/hues/variations of colors	D	E	Π		D	
Walking	D	П	Π	п	Π	۵
Sitting	U.	U	LÌ	x	L	Ē
Twisting	ti	x	Π	П	п	L.
Stooping	Ľ	x	Ľ	Lî.	- U	

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PROPRIETARY	JOB D	ESCR	IPTION			CONFIDENTI
Climbing Ladders, Stairs, etc.			D	D	П	D
Crouching	п	x	Π	D	П	П
Crawling	Ľ	x	Ľ	Ū.	Ц	L
Talking	n,	П	n.	x	x	Π
Hearing	۵			x	x	Ω
Reaching	C	п	ţ,	x	X	
Seeing	D			Ū.	0	Ш
Balancing	x		n	Π		
Pushing up tolbs.		Ľ	Ľ	- [1]	Ц	Ш
Pulling up tolbs.		D	[]	П	Ū	<u>(</u> *)
Grasping	U	U	Щ	x	x	
Lifting or carrying up to 25lbs.	D			0	0	
Feeling	17	x	E	П	П	П
Motion	U U	Ú	Ū	Ú	Ц	Ц
Precise hand movements		D		x	x	Ū
Reasoning or problem solving	Ŭ	Ľ	Ľ	Li	Ŭ.	13
Reading	Ū.	D		x	x	D
Writing	П		D	x	x	D
Performing math calculations	Ľ		Ľ	x	X	
Adhering to deadlines under pressure	0			x	x	
Learning or retaining technical information	П	Π	Π	x	x	Π
Interacting with customers or visitors		П	D.	X	X	

### APPLICABLE WORKING CONDITIONS

Please check the appropriate box to indicate the applicable working conditions.

WORKING CONDITIONS	AMOUNT OF TIME TYPICALLY SPENT ON ACTIVITY								
	DAILY	WEEKLY	MONTHL Y	1-4 TIMES A YEAR	RARELY	N E V ER			
Inside work: protected from weather conditions			D			D			
Outside work: no effective protection from weather	, Ü	E.	U	LI -	Ц	D.			
Both inside and outside work: activities occur both inside and outside an enclosed office/building	x	Ľ	13	Ц.	Ц	Ľ.			
Extreme cold: below 32 degrees for periods of more than 1 hour	C	П			Ū				
Extreme heat: above 100 degrees for periods of more than 1 hour	- U	Ú	LI.	L)	x	Ľl.			

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PROPRIETARY	JOB DE	SCRIPTIC	<u>N</u>		CONFIDENTIAL		
Noise: employees must shout to be heard over ambient noise level (hearing protection required)	Π	П			х		
Vibration: exposure to oscillating movements of extremities or whole body	Ц	()	U		x		
Potential hazards: moving parts, electricity, gas, scaffolding, chemicals, etc.	x	11	<u>n</u>	<u>D</u>			
Terminal viewing: extended viewing of screens	x	Ц	LI	11	Ū	[1]	
Atmospheric conditions (in non-confined spaces): fumes, odors, mists, gases, poor ventilation, etc.		П	Π	C)	D	П	
Oils: air and/or skin exposure to oils and other cutting fluids	0		D	x	D		
Respirator: the employee is required to wear a respirator	L1	LI.	x	U			
Physical stamina: due to emergency or work load demands, subject to extended work hours requiring stamina beyond normal demands or levels	Ц	Ц	x	U			
None: employee is NOT substantially exposed to adverse environmental conditions (work occurs in typical office or administrative environment)		0	D				

NOTE: This job description is not intended to be all-inclusive. Employee may perform other duties as required to meet the ongoing needs of the organization

**Employee Signature** 

Date

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### JOB DESCRIPTION

CONFIDENTIAL

JOB TITLE:	Customer Service Represenative II	INCENTIVE ELIGIBLE:	None
JOB FAMILY:	Customer Service	CAR ALLOWANCE:	None
JOB FUNCTION:	Post sales execution and service	<b>REPORTS TO:</b>	Manager
JOB CODE:	101226	PAY RANGE:	
FLSA:	Non Exempt Salaried	JOB LOCATION:	Varies
DATE PREPARED:	9/13/08	DEPARTMENT:	Customer Service
DATE REVISED:	May 2009	DIVISION:	ESD

### JOB SUMMARY:

Telephonically works with customers and various departments and sources to ensure customer's satisfaction with service and waste transportation and acceptance in accordance with applicable regulations and PSC policies, practices and procedures.

### PRINCIPAL DUTIES AND RESPONSIBILITIES:

- Responds to incoming calls from various sources including generators, brokers, sales representatives, etc., providing quotations, profiling for waste acceptance, scheduling of inbound loads and outbound bulk liquid loads, treatment capabilitis, regulation explanation, and coordination with sales group and other company depts to
- Display strong and positive communications with all external clients and internal co-workers.
- Interface with accounting, production and transportation to ensure successful, on-time pick ups.
- Create quotations for all new approvals, reapprovals and recertifications. Also responsible for mailing and filing.
- Provide plant with job numbers to receive outside transporter's deliveries into plant.
- Performs other projects and duties as assigned.
- Responsible for scheduling inbound loads, putting together LTL runs for transportation and outbound bulk liquids from production.
- They are responsible for reviewing invoicing before it is finalized.
- Performs other duties as required

### **MEASURES OF PERFORMANCE:**

- Returns all telephone calls and emails within 24 hour period.
- Calls customer back on all requests and give them a timeline for request.
- Schedules all LTL clients within 21 days of initial call.

### EDUCATION/CREDENTIALS:

- · High school diploma or GED
- Minimum 2+ years of professional experience in Customer Service.

### JOB RELATED EXPERIENCE:

- One year hands-on experience in the hazardous waste field.
- 2+ years experience in customer service.



### JOB DESCRIPTION

CONFIDENTIAL

# DEMONSTRATED KNOWLEDGE, SKILLS AND ABILITIES:

- Compliance with company policies and procedures.
- Responsive to client needs ni a timely and value-added manner
- Excellent verbal and written communication skills
- Works well underpressure and stressful conditions.
- Self-motivated, confident and highly dependable
- Solid follow-up and follow through skills
- Strong computer skilsl with all Microsoft Office applications.

### WORKING CONDITIONS:

- Office environment
- 101226

PROPRIETARY

### ESSENTIAL ABILITIES AND WORKING CONDITIONS

### Environmental Demands

Please place a check mark in the appropriate box to indicate the physical and mental demands of this position: (Modifications may be made to reasonably accommodate individuals with disabilities.)

ACTIVITY	AMC	UNT OF T SPENT ON	FUNCTION			
	NONE	UP TO 1/3	1/3 TO 2/3	MORE THAN 2/3	Essential	Non Essential
Standing on hard surfaces	Π	x	n	[]]	x	П
Distinguishing all shades/hues/variations of colors	x	D	0		x	Ē
Walking	0	x	Π	Π	x	Ū
Sitting	Ľ	<u> </u>	U	x	x	E
Twisting	x	I		U		x
Stooping	[]	x	Π	.17	x	
Crouching	Ц	x	D	Ľ	x	ĽI
Crawling	x	п	Π	П	t1	x
Talking	Ľ	Ц	ĽI	x	x	G
Hearing	Π		D	x	x	
Reaching	x	E	[7]	C.	Π	x
Seeing	Ū	Ш	Ц	x	x	1
Balancing	x	۵	Π		D	x
Pushing up tolbs.	x	Ü	ĽJ.	Ш	-11-	x
Pulling up tolbs.	x	Ö	D	Q	Ó	x
Grasping	x		D	LI I	П	П
Lifting or carrying up to _5_lbs.	Ľ	x	Ü	L)	x	Ľ
Feeling	x				Ū.	x

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### JOB DESCRIPTION

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PROPRIETARY

### APPLICABLE WORKING CONDITIONS

WORKING CONDITIONS	opriate box to indicate the applicable working conditions. AMOUNT OF TIME TYPICALLY SPENT ON ACTIVITY							
	DAILY	WEEKL Y	MONTHL Y	1-4 TIMES A YEAR	RARELY	NEVER		
Inside work: protected from weather conditions	x	Ū		<u>C1</u>				
Outside work: no effective protection from weather	ĽI.	Π		ū	۵	x		
Both inside and outside work: activities occur both inside and outside an enclosed office/building	Ш	11	Ц	Ц	Ľ	x		
Extreme cold: below 32 degrees for periods of more than 1 hour	П	П		П	Ē	x		
Extreme heat: above 100 degrees for periods of more than 1 hour	D	D	U.	ÿ	Ш	x		
Noise: employees must shout to be heard over ambient noise level (hearing protection required)	n	.[]	n			x		
Vibration: exposure to oscillating movements of extremities or whole body				Ę)		x		
Potential hazards: moving parts, electricity, gas, scaffolding, chemicals, etc.	- Îl	D.	(C)		171	x		
Terminal viewing: extended viewing of screens	x		<u>()</u> :	Ţ]		D		
Atmospheric conditions (in non-confined spaces): fumes, odors, mists, gases, poor ventilation, etc.		Ū		C	Π	x		
Oils: air and/or skin exposure to oils and other cutting fluids	П	П	Π	Π	Ω	x		
Respirator: the employee is required to wear a respirator	Π	D	11		n	x		
Physical stamina: due to emergency or work load demands, subject to extended work hours requiring stamina beyond normal demands or levels			x					
None: employee is NOT substantially exposed to adverse environmental conditions (work occurs in typical office or	x	()	П	ħ	D			

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PROPRIETARY	JOB DESCRIPTION	CONFIDENTIAL		
administrative environment)				
NOTE: This job description is n	ot intended to be all-inclusive. Employee may perform oth	her duties as required to meet the		

**NOTE:** This job description is not intended to be all-inclusive. Employee may perform other duties as required to ongoing needs of the organization

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### JOB DESCRIPTION

CONFIDENTIAL

JOB TITLE:	Dispatcher II	INCENTIVE ELIGIBLE:	None
JOB FAMILY:	Transportation	CAR ALLOWANCE:	No
JOB FUNCTION:	Customer waste pickups	<b>REPORTS TO:</b>	Operations Manager
JOB CODE:	100338	PAY RANGE:	
FLSA	Non Exempt Hourly	JOB LOCATION:	various
DATE PREPARED:	09/23/2008	DEPARTMENT:	Operations
DATE REVISED:	June 2009	DIVISION:	ESD

### JOB SUMMARY:

Schedules customer materials pickups and deliveries, assigns drivers and processes driver paperwork in accordance applicable DOT regulations and with PSC policies, practices and procedures.

### PRINCIPAL DUTIES AND RESPONSIBILITIES:

- Routes pickups and deliveries and assigns drivers.
- · Maintains logs and trip reports and ensures compliance with DOT regulations
- · Communicates with drivers.
- Ensures equipment inspections are up to date and in compliance with DOT regulations.
- · Performs other duties assigned

### **MEASURES OF PERFORMANCE:**

- Trucks routed correctly,
- Timely pick-ups
- Paperwork is correct.

### EDUCATION/CREDENTIALS:

- High school diploma
- CDL license with haz-mat and tanker endorsement

### JOB RELATED EXPERIENCE:

• 2-4 years experience in transportation prefer dispatching experience

### DEMONSTRATED KNOWLEDGE, SKILLS AND ABILITIES:

- Knowledge of DOT rules and regulations
- Ability to schedule trucks to save time and money
- Ability to communicate well with our drivers

### WORKING CONDITIONS:

Office environment

### ESSENTIAL ABILITIES AND WORKING CONDITIONS

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HR107



### JOB DESCRIPTION

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Environmental Demands

Please place a check mark in the appropriate box to indicate the physical and mental demands of this position: (Modifications may be made to reasonably

ACTIVITY		UNT OF T SPENT ON	FUNCTION			
	NONE	UP TO 1/3	1/3 TO 2/3	MORE THAN 2/3	Essential	Non Essentia
Standing on hard surfaces	ц.	х	Ľ	0	Х	Ľí
Distinguishing all shades/hues/variations of colors	U			0	0	X
Walking	[]	Х	Ū	0	x	
Sitting	0		Ц	X	Х	0
Twisting	П	Х	0	Π	x	
Stooping	Ľ	Х	0	Ц	x	D
Crouching		X	۵		x	
Crawling	X		Π	Π		X
Talking		U		X	Х	U
Hearing				X	X	
Reaching	Ľ	Ц	D	X	X	D
Seeing		D		X	x	
Balancing	D	x	П	0	X	D
Pushing up to50lbs.	Cl	x	0	Ľ	X	Ш
Pulling up to50lbs.	Π	X	0		X	G
Grasping	П	x	0	D.	X	0
Lifting or carrying up to50lbs.	0	X	0	D	x	
Feeling		Ц	x	D	x	Π
Motion	Ľ	Ľ	X	Ľ	X	Û
Precise hand movements		0	X		x	
Reasoning or problem solving	П	п	П	x	x	П
Reading	U.	Ľ	X	D	x	Ŭ
Writing		0	X	- <u>n</u>	x	ĺ.
Performing math calculations	Ľ	0	x		x	U
Adhering to deadlines under pressure		X	Π		x	
Learning or retaining technical information	П	X	П	n	x	[]
Interacting with customers or visitors	D	x	Ľ	U	X	D

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CONFIDENTIAL

### JOB DESCRIPTION PROPRIETARY APPLICABLE WORKING CONDITIONS Please check the appropriate box to indicate the applicable working conditions. AMOUNT OF TIME TYPICALLY SPENT ON ACTIVITY WORKING CONDITIONS MONTHL DAILY WEEKL NEVER 1 - 4RARELY Y Y TIMES A YEAR 0 X Inside work: protected from weather conditions $\square$ 0 X Outside work: no effective protection from weather П X 0 U Both inside and outside work: activities occur both inside FI 11 and outside an enclosed office/building X 0 П Π $(\overline{)}$ Extreme cold: below 32 degrees for periods of more than 1 hour Extreme heat: above 100 degrees for periods of more than 1 П Π X hour X 0 Π **F**T Π Noise: employees must shout to be heard over ambient noise level (hearing protection required) X Vibration: exposure to oscillating movements of extremities or whole body Potential hazards: moving parts, electricity, gas, scaffolding, Х U 11 [] chemicals, etc. X 0 Terminal viewing: extended viewing of screens C 0 D Π X [1] Atmospheric conditions (in non-confined spaces): fumes, odors, mists, gases, poor ventilation, etc. X U Oils: air and/or skin exposure to oils and other cutting fluids D X 0 Π 11 Respirator: the employee is required to wear a respirator X Physical stamina: due to emergency or work load demands, G subject to extended work hours requiring stamina beyond normal demands or levels X 0 None: employee is NOT substantially exposed to adverse 11 D environmental conditions (work occurs in typical office or administrative environment)

NOTE: This job description is not intended to be all-inclusive. Employee may perform other duties as required to meet the ongoing needs of the organization

Employee

Date

Manager

Date



### JOB DESCRIPTION

CONFIDENTIAL

Administrative assistant	ELIGIBLE:	List Incentive Plan
	CAR ALLOWANCE:	
	REPORTS TO:	
Assigned by Compensation	PAY RANGE:	Assigned by Compensation
Assigned by Compensation	JOB LOCATION:	
	DEPARTMENT;	······
	DIVISION:	
	Assigned by Compensation	CAR ALLOWANCE: REPORTS TO: Assigned by Compensation PAY RANGE: Assigned by Compensation JOB LOCATION: DEPARTMENT:

### **JOB SUMMARY:**

Answer incoming phone calls from clients and other PSC representatives. Data enter bill of ladings and manifests from incoming loads. Produce out-bound paperwork for waste leaving facility. Waste tracking, Human resource work, employee insurance, tax forms, training records, Pan forms.

### PRINCIPAL DUTIES AND RESPONSIBILITIES:

State the principal duties, tasks, and/or accountabilities and the reason performed

- Answer incoming phone calls, and greet visitors at front door.
- Monitor front gate for security, activate electronic gate opener.
- Data enter paperwork for incoming waste.
- Produce outbound paperwork, gather certificated of disposal, disperse and file.
- Waste tracking, data enter lab pack and retail paperwork and track.
- Manage office supplies, vendors to include copier service, Nextel, guard and cleaning service.

# SCOPE: This information helps determine the size of the job which drives the market evaluation and internal equity analysis. Whatever you list should be quantifiable in terms of dollars or numbers

- Responsible for expenses approximating \$\_\_\_\_\_ dollars annually.
- Number of Reports:
  - o Direct
  - o Indirect
- Number of facilities:
- Geography: International, Continental, National, regional, location, site,
- P&L responsibility
- Revenue \$

### **MEASURES OF PERFORMANCE:**

- Customer satisfaction of phone calls, and quick response to question they may have.
- Timely paperwork data entry for billing.
- Timely paperwork for outbound disposal
- HR work for employee satisfaction.

### EDUCATION/CREDENTIALS:

High school diploma



### JOB DESCRIPTION

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- PROPRIETARY
  - 2 year college degree

### JOB RELATED EXPERIENCE:

- Range of directly related job experience in years i.e. 1-3 years hands-on experience handling hazardous
  waste
- N/A

### DEMONSTRATED KNOWLEDGE, SKILLS AND ABILITIES:

- Describe the working knowledge of concepts, systems, laws, regulations, etc. minimally required to perform the job competently.
- Administrative assistants produce manifests, track waste and are required US DOT training annually.
- Describe the behaviors required such as ability to work under pressure, meet multiple deadlines, customer focused, etc.
- Administrative assistants must be able to multi task and work well with peers.
- Describe the technical/mechanical skills required such as 10 key by touch, PC skills, etc.
- Must have good PC skills, will be required to perform many reports for facility including DMR, OSHA 300 log,
- employee training logs.

### WORKING CONDITIONS:

 Complete this worksheet by marking the boxes in the appropriate columns and rows to describe the physical and mental and environmental conditions that the person will work under.

### ESSENTIAL ABILITIES AND WORKING CONDITIONS

Environmental Demands

Please place a check mark in the appropriate box to indicate the physical and mental demands of this position: (Modifications may be made to reasonably

ACTIVITY	AMC	UNT OF T SPENT ON	FUNCTION			
	NONE	UP TO 1/3	1/3 TO 2/3	MORE THAN 2/3	Essential	Non Essential
Standing on hard surfaces	ũ	x	Ľ	Ú,	XXL	E)
Distinguishing all shades/hues/variations of colors	x	D			Π	Шx
Walking	Π	Пх	П	EI.	xП	
Sitting	0		D	$\Box \mathbf{x}$	□x	D
Twisting	xП	Ū.	Ū	E	FI	xП
Stooping	xU	Ľ	Ľ	Ľ	Ц	хD
Crouching	□x	٥	D	ũ	Ū.	x□
Crawling	Пх	Ē.	П	[]	П	Пx
Talking	Ľ	Ľ.	11	LIX.	x	121

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PROPRIETARY	JOB D	DESCR	PTION			CONFIDE	VTIAL
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Reaching	0	□x	0	D	□x	П	
Seeing	0		n	□x	[] <b>x</b>		
Balancing	□x	D	Ш	Q	Ľ	х□	
Pushing up tolbs.	хC	D	D		Ó	□x	
Pulling up tolbs.	□x	Q	D			хП	
Grasping	□x	0			1	x	
Lifting or carrying up tolbs.	□x	П	п	П	CI	x	
Feeling	□x	Ц	U	L	Ľ	Ц <b>х</b>	
Motion	∏x	0	0			□x	
Precise hand movements	Д	Π	∏x.	D	Пх	<u>[]</u>	
Reasoning or problem solving	Ľ1	U	x⊔	U	□x		
Reading	п	FI	Пx	Ð	Пх	П	
Writing	Ľ	Ľ	x	D	Шx	D	
Performing math calculations	D	хD	Ð	E	□x		
Adhering to deadlines under pressure	П	Π	П	хΠ	Пx	П	
Learning or retaining technical information	11		Ū.	⊔x	xLl	Π	
Interacting with customers or visitors				x□	хĽ	Ē	

<u>APPLICABLE WORKING CONDITIONS</u> Please check the appropriate box to indicate the applicable working conditions.

WORKING CONDITIONS		AMOUNT OF TIME TYPICALLY SPENT ON ACTIVITY							
	DAILY	WEEKL Y	MONTHL Y	1-4 TIMES A YEAR	RARELY	NEVER			
Inside work: protected from weather conditions	xO	U	Ľ	- Li -	Ľ				
Outside work: no effective protection from weather	[]	D	T]	П	Ē	х□			
Both inside and outside work: activities occur both inside and outside an enclosed office/building		D	п	п	П	x□			
Extreme cold: below 32 degrees for periods of more than 1 hour	Ľ.	Ĺ	Ľ	Ē.	LI	□x			
Extreme heat: above 100 degrees for periods of more than 1 hour	D	[]	۵	ĒÌ	[]	□x			
Noise: employees must shout to be heard over ambient noise level (hearing protection required)	D	.0	8			□x			
Vibration: exposure to oscillating movements of extremities or whole body	П	11	71	Π	11	Пх			

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PROPRIETARY	JOB D	ESCRIP	TION		CC	NFIDENTIA
Potential hazards: moving parts, electricity, gas, scaffolding, chemicals, etc.	C)		Ľ	D	U	x∐
Terminal viewing: extended viewing of screens	хÜ	D	D	D		D
Atmospheric conditions (in non-confined spaces): fumes, odors, mists, gases, poor ventilation, etc.				D		
Oils: air and/or skin exposure to oils and other cutting fluids	τī	Γ)	C]	D	El	Ũ
Respirator: the employee is required to wear a respirator	D,		0	Π	۵	<b>x</b> П
Physical stamina: due to emergency or work load demands, subject to extended work hours requiring stamina beyond normal demands or levels	Ц	۵				x□
None: employee is NOT substantially exposed to adverse environmental conditions (work occurs in typical office or administrative environment)	0	Π	Ω	Π	r)	Ū

Employee

Date

Manager

Date



### JOB DESCRIPTION

CONFIDENTIAL

JOB TITLE:	Sales Coordinator	INCENTIVE ELIGIBLE:		
JOB FAMILY:	Customer Service	CAR ALLOWANCE: REPORTS TO:		Manager
JOB CODE:	SACS70	PAY RANGE:	Assigned by Compensation	
FLSA	Assigned by Compensation	JOB LOCATION:		
DATE PREPARED:	9/13/08	DEPARTMENT:	Customer Service	
DATE REVISED:		DIVISION:		

### JOB SUMMARY:

Primary responsibilities are to assist Approvals Department with a quick turnaround for approvals, receives and enter profiles in receipt log, enters templates for approvals to complete. Assist Sales Manager and Sales Representatives with any special requests. Secondary is a back up to Customer Service in peak incoming telephone periods or help with coverage during routine transitions caused by employee resignations. Filing of sales and approvals files.

### PRINCIPAL DUTIES AND RESPONSIBILITIES:

- Assist approvals with profiles for quick turnaround.
- Assist Sales Manager and Sales Representatives with any special requests.
- Field all incoming calls. Responsible for satisfying all requests by clients or sales representatives.
- Display strong and positive communications with all external clients and internal co-workers.
- Interface with accounting, production and transportation to ensure successful, on-time pick ups.
- Create quotations for all new approvals, reapprovals and recertifications. Also responsible for mailing and filing.
- Provide plant with job numbers to receive outside transporter's deliveries into plant.
- Performs other projects and duties as assigned.
- Responsible for scheduling inbound loads, putting together LTL runs for transportation and outbound bulk liquids from production.
- SCOPE:Number of Reports:
  - o Direct 0
  - o Indirect 0
- Number of facilities: 2
- Geography: Regional

### **MEASURES OF PERFORMANCE:**

- Return all telephone calls and emails within 24 hour period.
- · Call customer back on all requests and give them a timeline for request.
- Schedule all LTL clients within 21 days of initial call.
- Log new incoming profiles within one hour of receipt.
- WORK WITH SALES REPS TO ENSURE TIMELY DELIVERY OF SPECIAL REQUEST.

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### JOB DESCRIPTION

CONFIDENTIAL

### PROPRIETARY

### EDUCATION/CREDENTIALS:

- High school diploma
- GED
- College
- Minimum 2+ years of professional experience in Customer Service.

### JOB RELATED EXPERIENCE:

- One year hands-on experience in the hazardous waste field.
- 2+ years experience in customer service.

### DEMONSTRATED KNOWLEDGE, SKILLS AND ABILITIES:

- ABILITY TO FOLLOW COMPANY POLICIES AND PROCEDURES.
- ABLE TO RESPOND TO CLIENT NEEDS IN A TIMELY AND VALUE-ADDED MANNER.
- EXCEPTIONAL ORAL AND WRITTEN SKILLS.
- MUST WORK WELL UNDER PRESSURE AND MAINTAIN PROFESSIONALISM DURING STRESSFUL SITUATIONS. MUST BE SELF-MOTIVATED, CONFIDENT AND HIGHLY DEPENDABLE.
- MUST POSESS SOLID FOLLOW UP SKILLS.
- STRONG COMPUTER SKILLS, INCLUDING EXPERIENCE WITH MICROSOFT APPLICATIONS.
- .

### WORKING CONDITIONS:

 Complete this worksheet by marking the boxes in the appropriate columns and rows to describe the physical and mental and environmental conditions that the person will work under.

### ESSENTIAL ABILITIES AND WORKING CONDITIONS

Environmental Demands

Please place a check mark in the appropriate box to indicate the physical and mental demands of this position: (Modifications may be made to reasonably accommodate individuals with disabilities.)

ACTIVITY	AMO	UNT OF T SPENT ON			FUNCTION		
	NONE	UP TO 1/3	1/3 TO 2/3	MORE THAN 2/3	Essential	Non Essential	
Standing on hard surfaces		x	0	Π.	x	E)	
Distinguishing all shades/hues/variations of colors	x	۵	П		x	D	
Walking		x	B	П	x	<u>(1)</u>	
Sitting	Ľ.	U	Ш	x	x	D	
Twisting	x	۵		D	Π.	x	
Stooping	П	x	П	П	x	Q	
Crouching	U	x	ĽĽ	Ē.	x	Ð	
Crawling	x	П		D	D.	x	

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CONF	IDEN	TIAL

PROPRIETARY	JOB D	ESCR	PTION			CONFIDENT
Talking		D	13	x	x	
Hearing	0			x	x	
Reaching	x		П		D	x
Seeing	П	Û	Ľ	x	x	-13
Balancing	x	٥	D	E		x
Pushing up tolbs.	x	Π	Ū	П	EI	x
Pulling up tolbs.	x		٥	D		x
Grasping	x	.(7)	۵	Π	П	
Lifting or carrying up to5lbs.	Ü	x	D	D	x	U
Feeling	x	D			Ũ	x
Motion	n	Ω	Π	x	x	[]
Precise hand movements	x	E	D	0	U	x
Reasoning or problem solving		- 0	0	x	x	Q
Reading	Ŭ	x	۵	U.	x	LI
Writing	0			x	x	
Performing math calculations		Ď	x	ĘĽ	x	
Adhering to deadlines under pressure	Ľ	[]		x	x	ĽI –
Learning or retaining technical information	C	Q		x	x	Ū
Interacting with customers or visitors	0	۵	Ш	x	x	D

### APPLICABLE WORKING CONDITIONS

Please check the appropriate box to indicate the applicable working conditions. ALL A COURTS (11775)

WORKING CONDITIONS	ł	AMOUNT O	F TIME TYPI	CALLY SPEN	T ON ACTIVI	TY
	DAILY	WEEKL Y	MONTHL Y	1-4 TIMES A YEAR	RARELY	NEVER
Inside work: protected from weather conditions	x	П	D	D		0
Outside work: no effective protection from weather	Ц	11	E)	ĒJ		x
Both inside and outside work: activities occur both inside and outside an enclosed office/building	Ľ	U	U	Ц	Ц	x
Extreme cold: below 32 degrees for periods of more than 1 hour						x
Extreme heat: above 100 degrees for periods of more than 1 hour	Ľ	U	Ŭ.	11		x
Noise: employees must shout to be heard over ambient noise level (hearing protection required)	0.		Π.	П	Γl	x
Vibration: exposure to oscillating movements of extremities	[]	13	IJ	U	Ш	x

PSC considers applicants for all positions without regard to race, color, religion, creed, gender, national origin, age, special disability or medical or veteran status in accordance with federal law and complies with applicable state and local laws prohibiting discrimination in employment in every jurisdiction in which it maintains facilities. C:\Documents and Settings\amorta\My Documents\PSC MOST CURRENT MAY2010\PSC Information\job descriptions\Sales\_Coordinator,doc



PROPRIETARY	JOB D	ESCRIP	TION		CC	NFIDENTIAL
or whole body	1					
Potential hazards: moving parts, electricity, gas, scaffolding, chemicals, etc.	E.	П	D		Π	x
Terminal viewing: extended viewing of screens	x		D	L	D	D
Atmospheric conditions (in non-confined spaces): fumes, odors, mists, gases, poor ventilation, etc.	U.	Ц	Ľ	D	F	x
Oils: air and/or skin exposure to oils and other cutting fluids	D	П	П	Π	(Î	x
Respirator: the employee is required to wear a respirator	Ē	П		D	П	x
Physical stamina: due to emergency or work load demands, subject to extended work hours requiring stamina beyond normal demands or levels	٥	۵	x	Q	D	Π
None: employee is NOT substantially exposed to adverse environmental conditions (work occurs in typical office or administrative environment)	x	0	0	G	G	

NOTE: This job description is not intended to be all-inclusive. Employee may perform other duties as required to meet the ongoing needs of the organization

Job Title	24 Hr HAZWOPER	Annual Updates- HAZWOPER	Hazard Comm	Emergency Response Plan	Hazardous Waste Regulation	Confined Space Entry	Electrical Safety	Industrial Truck Operations	Hazardous Materials Handling	First Aid/ CPR
Administrative Assistant I			Х	Х						
Administrative Assistant II			Х	Х						
Associate Logistics Planning			Х	Х						
Chemist II	Х	Х	Х	Х	Х		Х		Х	
Clerk - Accounting I			Х	Х						
Clerk - Accounting II			Х	Х						
Clerk - Accounting III			Х	Х						
Clerk - Office			Х	Х						
Coordinator - Operations	Х	Х	Х	Х	Х			Х	Х	
Coordinator - Sales			Х	Х						
Environmental Project Manager	Х	Х	Х	Х	Х		Х		Х	
Customer Service Representative			Х	Х	Х					
Customer Service Manager			Х	Х	Х				Х	
Driver	Х	Х	Х	Х	Х		Х		Х	
EH&S Specialist	Х	Х	Х	Х	Х		Х		Х	Х
Technician - Environmental I	Х	Х	Х	Х	Х		Х		Х	
Technician - Environmental II	Х	Х	Х	Х	Х		Х		Х	
Technician - Haz Waste I	Х	Х	Х	Х	Х		Х	Х	Х	
Laborer	Х	Х	Х	Х	Х	X	Х	Х	Х	
Maintenance Manager	Х	Х	Х	Х	Х	X	Х	Х	Х	
Maintenance Supervisor	Х	Х	Х	Х	Х	X	Х	Х	Х	
Materials Coordinator	Х	Х	Х	Х	Х		Х		Х	

Job Title	24 Hr HAZWOPER	Annual Updates- HAZWOPER	Hazard Comm	Emergency Response Plan	Hazardous Waste Regulation	Confined Space Entry	Electrical Safety	Industrial Truck Operations	Hazardous Materials Handling	First Aid/ CPR
Mechanic	Х	Х	Х	Х	Х	Х	Х	Х	Х	
Manager - Operations	Х	Х	Х	Х	Х	Х	Х	Х	Х	Х
Manager - General	Х		Х	Х	Х					
Manager - Laboratory	Х	Х	Х	Х	Х				Х	
Operator-Level 1	Х	Х	Х	Х	Х	X	Х	Х	Х	
Operator-Level 2	Х	Х	Х	Х	Х	Х	Х	Х	Х	
Receiving	Х	Х	Х	Х	Х		Х		Х	
Representative - Cust Service I			Х	Х	Х				Х	
Representative - Cust Service II			Х	Х	Х				Х	
Representative - Sales I			Х	Х	Х				Х	
Representative - Sales II			Х	Х	Х				Х	
Specialist, EHS	Х	Х	Х	Х	Х		Х		Х	
Supervisor-Operations	Х	Х	Х	Х	Х	х	Х	Х	Х	
Supervisor-Maintenance	Х	Х	Х	Х	Х	Х	Х	Х	Х	Х

Job Title	Hot Work Permits (Issuance)	Fire Safety/ Fire Extinguisher	Office Safety	HazMat Transport	Respiratory Fit Test	Lock- out/Tag- out	Safe on Purpose	Aerial Platform	Lab SOPs/QA Manual	Drug Awareness
Administrative Assistant I			Х				Х			Х
Administrative Assistant II			Х				Х			Х
Associate Logistics Planning			Х				Х			Х
Chemist II		Х		Х	Х		Х		Х	Х
Clerk - Accounting I			Х				Х			Х
Clerk - Accounting II			Х				Х			Х
Clerk - Accounting III			Х				Х			Х
Clerk - Office			Х				Х			Х
Coordinator - Operations		Х	Х	Х	Х	Х	Х			Х
Coordinator - Sales			Х				Х			Х
Environmental Project Manager				Х	Х		Х			Х
Customer Service Representative			Х	Х			Х			Х
Customer Service Manager			Х	х			Х			Х
Driver		Х		Х	Х		Х			Х
EH&S Specialist	Х	Х	Х	Х	Х		Х			Х
Technician - Environmental I		Х		Х	Х		Х		Х	Х
Technician - Environmental II		Х		Х	Х		Х		Х	Х
Technician - Haz Waste I		Х		Х	Х		Х		Х	Х
Laborer		Х		х	Х	х	Х	х		Х
Maintenance Manager	Х	Х			Х	х	Х	х		Х
Maintenance Supervisor	Х	Х		х	Х	х	Х	х		Х
Materials Coordinator		Х	Х	Х	Х		Х			Х

Job Title	Hot Work Permits (Issuance)	Fire Safety/ Fire Extinguisher	Office Safety	HazMat Transport	Respiratory Fit Test	Lock- out/Tag- out	Safe on Purpose	Aerial Platform	Lab SOPs/QA Manual	Drug Awareness
Mechanic	Х	Х		Х	Х	Х	Х	Х		Х
Manager - Operations	Х	Х	Х	Х	Х	Х	Х			Х
Manager - General			Х				Х			Х
Manager - Laboratory		Х	Х	Х	Х		Х			Х
Operator-Level 1		Х		Х	Х	Х	Х			Х
Operator-Level 2		Х		х	Х	Х	Х	Х		Х
Receiving				Х			Х			Х
Representative - Cust Service I			Х	Х			Х			Х
Representative - Cust Service II			Х	Х			Х			Х
Representative - Sales I			Х	Х			Х			Х
Representative - Sales II			Х	Х			Х			Х
Specialist, EHS	Х	Х	Х	Х	Х	Х	Х	Х		Х
Supervisor-Operations	Х	Х	Х	х	Х	Х	Х	Х		Х
Supervisor-Maintenance	Х	Х	Х	х	Х	Х	Х	Х		Х

# COMPETENCY LEVEL MATRIX

### EMPLOYEE NAME:

PR	OCEDURE	BASIC	AWAREI	NESS	JOB KNOWLEDGE		WITHOUT ASSISTANCE		ABLE TO TRAIN			RETRAIN				
TITLE	DESCRIPTION	DATE	EMP	TRN	DATE	EMP	TRN	DATE	EMP	TRN	DATE	EMP	TRN	DATE	EMP	TRN

# Appendix V

Training Certificate

# 8-HOUR TRAINING CONTENT / SUBJECT MATTER

# HAZWOPER Compliance Series Titles

Safety Orientation Introduction to Hazwoper Retraining Understanding Chemical Hazards PPE and Decontamination Procedures Hazmat Labeling Accidental Release Measures and Spill Clean up Procedures

Summit Training Source, Inc. Titles

Bloodborne Pathogens HC

# TRAINING SIGN-IN/RECEIPT

Date:		Location:	
Subject:			
			~.
	Name	_	Signature
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		-	
		-	
		-	
		-	

# 8-HOUR TRAINING CONTENT / SUBJECT MATTER

## HAZWOPER Compliance Series Titles

Introduction to Hazwoper Retraining Handling Hazardous Materials Respiratory Protection Confined Space Entry Electrical Safety In Hazmat Environments Hazmat Labeling Accidental Release Measures and Spill Clean up Procedures

Summit Training Source, Inc. Titles

Bloodborne Pathogens HC

# TRAINING SIGN-IN/RECEIPT

Date:		Location:	
Subject:			
	Name	_	Signature
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		-	
		-	
		-	
		- -	

# 8-HOUR TRAINING CONTENT / SUBJECT MATTER

## HAZWOPER Compliance Series Titles

Introduction to Hazwoper Retraining Work Practices and Engineering Controls Monitoring Procedures and Equipment Fire Prevention Site Safety and Health Plan ANSI Material Safety Data Sheet Accidental Release Measures and Spill Clean up Procedures

Summit Training Source, Inc. Titles

Bloodborne Pathogens HC

# TRAINING SIGN-IN/RECEIPT

Date:	Location:		
Subject:			
	Name		Signature

# HAZCOM TRAINING CONTENT / SUBJECT MATTER

HAZWOPER Compliance Series Titles

Safety Orientation Hazmat Labeling ANSI Material Data Safety Sheet

# TRAINING SIGN-IN/RECEIPT

Date:		Location:	
Subject:			
			~.
	Name	_	Signature
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# DOCUMENTATION OF EMPLOYEE TRAINING



EMPLOYEE INFORMATION						
Employee Name:						
Position/Function:			Employ	ment Date:		
	TRAIN	ER INFORM	IATION			
Trainer Name:			Training Co	omp. Date:		
Co. Name & Address:						
	DESCRIP	TION OF T	RAINING			
	Video/Slide	s			0.5 - 2.0	HRS
	Classroom Handou	t Review			1.0 - 2.5	HRS
	Lecture/Present	ation			1.0 - 3.0	HRS
Super	vised Hands-On Instruc	tion/Demonst	ration		0.5 - 1.5	HRS
Writte	n Exam/Performance Ev	valuation & R	eview		0.5 - 1.5	HRS
Other: Specified Below					varies	HRS
	Narrative Description of Training Provided					
8-HR Refresher - 29 CH	FR 1910.120 (a) & (e)		USDOT	' HazMat (H	[M-126F)	
	ation / Right-to-Know			Γ Trans Seci	í F	
	raining Modules A-M		SDOT Trans		· ·	
	Pathogens Awareness			DOT Specia		
	SC/Home Depot BBP					
	1					
Federal Uniform Haza	rdous Waste Manifest				l	
			[	TOTAL	HOURS:	0.00
	CEI	RTIFICATIO	ONS			
TRAINER: I certify that the employee identified above has been given the training described above. The training provided included examinations and reviews in accordance with applicable regulatory provisions.						
TRAINER SIGNATURE DATE						
EMPLOYEE: I certify that I have received the training and testing that is referenced in this document.						
EMPLOYEE SIGNATURE   DATE						

**Petro-Chem** 

# DOCUMENTATION OF EMPLOYEE TRAINING

EMPLOYEE INFORMATION						
Employee Name:						
Position/Function:			Employ	ment Date:		
	TRAINI	ER INFORM	ÍATION			
Trainer Name:			Training C	omp. Date:		
Co. Name & Address:	Petro-Chem Processi	ng Group of ]	Nortru, LLC	- 421 Lycas	te, Detroit, N	4I 48184
	DESCRIP	TION OF T	RAINING			
	Video/Slide	s			0.5 - 2.0	HRS
	Classroom Handout	t Review			1.0 - 2.5	HRS
	Lecture/Present	ation			1.0 - 3.0	HRS
					0.5 - 1.5	HRS
1				0.5 - 1.5	HRS	
Other: Specified Below varies			varies	HRS		
Narrative Description of Training Provided						
8-HR Refresher - 29 CH	FR 1910.120 (q) & (e)		USDO	Г HazMat (H	[M-126F)	
Hazard Communication / RI Right-to-Know USDOT Trans Security Plan						
RCRA T	raining Modules A-M	ι	SDOT Tran	is Security A	wareness	
Bloodborne	Pathogens Awareness		US	SDOT Specia	al Permits	
Ρ	SC/Home Depot BBP				[	
			Lab C	hemical Hyg	jiene Plan	
Federal Uniform Haza	rdous Waste Manifest			Waste Ana	lysis Plan	
				TOTAL	HOURS:	0.00
	CEI	RTIFICATI	ONS			
TRAINER: I certify that the employee identified above has been given the training described above. The training provided included examinations and reviews in accordance with applicable regulatory provisions.						
TRAI	NER SIGNATURE	-		DA	TE	
EMPLOYEE: I certify that I have received the training and testing that is referenced in this document.						
EMPLO	OYEE SIGNATURE	-		DA	TE	

# Appendix VI

Site Specific Training

# TITLE: Empty Container Disposal

Level: Function: Department:	PSC Detroit Environmental Operations	Compliance	Document Control: Revision Number: Issue Date: RevisionDate:	<u>PSC-DET-01</u> 2 <u>September 30, 2009</u> 10/1/09; 3/24/11
Technical Rev Facility Mana		Date	Operations Manager	Date
Melani EH&S Specia	<u>e Fichu</u> list	<u>p 3/29/11</u> Date		

#### 1.0 Purpose:

To define a procedure for training Petro-Chem Processing Group (PCPG) facility personnel regarding the disposal of "empty containers"

#### 2.0 Description:

Any container that previously contained hazardous waste must first be rendered "RCRA empty" prior to shipment for final disposal or recycling. This SOP will apply to all containers ranging in size from 5-gallon pails to 330-gallon totes.

#### 3.0 General:

- **3.1** This SOP applies to all employees who store, process, route, sample, inspect, mark or label waste containers.
- 3.2 All applicable employees will be trained in the requirements of this SOP.
- 3.3 The provisions of this SOP will be strictly adhered to.
- **3.4** The Facility Manger will be responsible for training of key personnel who will be responsible for training their employees.
- **3.5** Prior to beginning any and all safety sensitive tasks, a Job Safety Analysis (JSA) is to be completed per PSC-ESD-JSA Policy 0110.

#### Definition:

RCRA Empty Containers – Any container or inner liner removed from a container that has held any hazardous waste is "RCRA empty" if: (1) All wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g. pouring, pumping, vacuuming, and (2) No more than one inch of residue remains on the bottom of the container or no more than 3 percent by weight of the total capacity of the container remains in the container (for containers up to 110 gallons in size) or no more than 0.3 percent by weight of the total capacity of the container remains in the container (for containers greater than 110 gallons in size).

#### 5.0 **Management of Empty Containers:**

Any container that previously contained hazardous waste must first be rendered "RCRA empty" (hereto forth empty) prior to shipment for final disposal or recycling. This SOP will apply to all containers ranging in size from 5 gallons (pails) to 330 gallons (totes).

- Upon removal of the waste from the waste container (hereto forth drum) the 5.1 drum(s) will be staged in a designated inspection area prior to loading them for shipment. Labels and markings on the drum will be left intact so that any potential residues requiring removal may be properly managed.
- Prior to the end of each shift, drums staged in the inspection area will be inspected 5.2 by the Operations Manager or his/her designee.
- The inspector will first verify the drum is empty. If it is not empty, the waste 5.3 residue will be further removed using conventional means, if possible, until the drum is empty. The residue will be managed the same as the waste from which it was derived. If the residue cannot be further removed to render the drum empty, the entire drum and its contents will be managed as hazardous waste whereby PSC Detroit will be the designated Generator.
- Once a drum has been verified empty, all markings shall be obliterated, marked 5.4 out, painted over, or completely removed, leaving no legible markings. Particular attention must be made to ensure that any markings on the drum having potential to identify PSC or its customers shall be thoroughly removed or rendered illegible. Containers that have not sufficiently cleaned and purged of vapors per the DOT regulations will have DOT hazard warning label left intact for non bulk (<119g/882lb capacity) or placards left in tact for bulk (>119g/882lb capacity) containers.
- Once all identifying markings have been properly managed, the empty drum will 5.5 be placed on/in the appropriate trailer or roll off box for shipment.
- Steel drums will be shipped to a PSC-approved scrap steel recycler or drum re-5.6 conditioner. Poly (plastic) drums will be shipped to a PSC-approved plastic recycler or drum re-conditioner.
- Drums which contained non-hazardous waste are managed in the same fashion; 5.7 only those in which the contents can not be adequately removed will be managed as non-hazardous waste whereby PSC Detroit will be the designated Generator.

DCN: PSC-DET-01

4.0

# 6.0 Training:

All employees will be trained on this SOP.

7.0 **Duties and Responsibilities:** The laboratory manager, lab pack supervisor, and shift supervisors will be responsible for supervising the activities of this SOP.

#### SOP ACKNOWLEDGEMENT

I have read the attached SOP entitled Empty Container Disposal and understand all portions.

Employee Name (Printed)

Employee Name (Signature)

Date

# TITLE: Tanker Load/Unload

Level: $\underline{P}$ Function: $\underline{E}$ Department: $\underline{O}$ 

<u>PSC Detroit</u> <u>Environmental Compliance</u> Operations

Revision Number: Issue Date: Revision Date:

**Document Control:** 

PSC-DET-02

October 3, 2009 3/24/11

Operations Manager

Technical Review, Facility Manager Date

<u>p 3/29/11</u> EH&S Specialist

### 1.0 Purpose:

Bulk waste liquids are shipped from the facility and received by the facility in tanker trucks. The material is loaded or unloaded by means of pumps, hoses, and associated piping and valves. This procedure identifies the steps to unload and load waste tank trailers.

### 2.0 Description:

This SOP will set out the list of steps necessary to load and unload all bulk tanker shipments at the facility. It will also describe the necessary equipment for performing these functions.

## 3.0 General:

**3.1** This SOP applies to all employees who load, unload, process, and sample tanker trucks.

- 3.2 All applicable employees will be trained in the requirements of this SOP.
- 3.3 The provisions of this SOP will be strictly adhered to.
- 3.4 All loading and unloading operations will be performed by a qualified individual in attendance at all times. This person is considered qualified only after the have been fully trained and proven capable of performing this task.
- **3.5** The individual will be considered to be in attendance if throughout the process they are awake and have an unobstructed view of the tanker and are within 25 feet.
- **3.6** The Operations Manger will be responsible for training of key personnel who will be responsible for training their employees.
- 3.7 Prior to beginning any and all safety sensitive tasks, a Job Safety Analysis (JSA) is to be completed per PSC-ESD-JSA Policy\_0110.

**Bulk/tanker truck** – a motor vehicle designed to carry liquefied loads, dry bulk cargo or gases on roads. The largest such vehicles are similar to railroad tank cars which are also designed to carry liquefied loads. Many variants exist due to the wide variety of liquids that can be transported. Tank trucks tend to be large; they may be insulated or non-insulated; pressurized or non-pressurized; and designed for single or multiple loads (often by means of internal

#### 5.0 Required Safety Equipment:

Required safety equipment includes rubber gloves, hard hat, safety glasses, steel toe boots, face shield, work uniform and apron as a minimum. Respirators fitted with organic vapor/acid gas cartridges will also be worn when on top of the tanker when dome lid is open.

#### 6.0 Unloading waste Tankers:

Before beginning any unloading operations, verify there is room in the storage tank(s) to accept the quantity of material to be unloaded. Do not begin unloading until the lab has released the material for processing. Connect the ground cable to the frame of the tanker before any unloading begins. This connection must be made to prevent static discharge between hoses and tanker.

- 6.1 Confirm with the driver that the hand brake on the tractor is securely set.
- 6.2 Secure tanker with chocks and jack (if needed).
- 6.3 Connect the ground cable to the frame of the tanker. This connection must be made to prevent static discharge between hoses and tanker. Ensure vapor balance hose is connected to top of tanker. Open the vapor collection line.
- 6.4 The vehicle's engine must be shut off unless it is to be used for the operation of the pump.
- 6.5 Slowly open the vent valve near the dome to release any tank pressure.
- 6.6 Slowly unscrew dome locks and open dome.
- 6.7 Inspect the tanker bottom valve and connections. Verify the valve is fully closed and undamaged. Make sure the hydraulic pressure is released on the safety valve.
- 6.8 Place a catch tray or bucket under the valve to contain any leakage.
- 6.9 Slowly remove cap from tanker valve. If leakage shows upon the actual removal, allow a careful controlled release of accumulated liquid into catch container. If the leak continues secure cap back on valve, recheck valve to ensure it is fully closed and try to remove cap again. If seal is not gained do not unload tanker from the bottom and notify supervisor.
- 6.10 Slowly open bleed valve located at the end of the hose to relieve any pressure. Close valve before disconnecting hose from the storage rack.
- **6.11** Disconnect hose from its storage rack and connect to tanker. Make sure cams are fully closed and secure with cam strap.
- 6.12 Slowly open hydraulic value on the side of tanker.
- 6.13 Slowly open tanker valve to flood unloading line.

- 6.14 Open all necessary lines leading to pump and to desired tank(s).Start pump and watch tank gauge to see if material is transferring. If material is not transferring stop the pump and recheck valve setup.
- 6.15 When tankers is empty, close hand valve, and relieve the pressure from the hydraulic valve.
- 6.16 With unloading pump continuing to run, slowly disconnect the hose from the hand valve. Air should be sucked into the hose to remove contents of hose so it can be disconnected from tanker.
- 6.17 If air is pulling into the hose, remove hose and connect back to storage rack.
- **6.18** Shut off pump, remove all hoses and close all valves that were opened during the unloading process. Close dome lid and secure locks, close vent valve, disconnect grounding cable. Remove catch tray and clean up any material left behind.
- 6.19 Pour catch tray into SAA drum located by pump station.

#### 7.0 Loading Waste Tankers:

Before beginning any loading operations, visually verify that the tanker compartment(s) to be loaded is empty. If a heel remains in the compartment, it will need to be verified with Facility Management that it is OK to load on top of the heel. Connect the ground cable to the frame of the tanker before any draining, flushing, or loading begins. This connection must be made to prevent static discharge between hoses and tanker.

- 7.1 Shut off pump and close all valves that were opened during the unloading process. Close dome lid and secure locks, close vent valve, disconnect grounding cable.
- 7.2 Confirm with driver that the hand brake on the tractor is securely set.
- 7.3 Secure tanker with chock and jack (if needed). The vehicles engine must be shut off unless it is to be used for the operation of the pump.
- 7.4 Place a catch tray or bucket under the valve to contain any leakage.
- 7.5 Connect hose to tanker. Make sure cams are fully closed and secure with cam strap. Ensure vapor balance hose is connected to top of tanker. Open the vapor collection line.
- 7.6 Open all required valves, including tanker hand valve and pump up hydraulic pressure to safety valve, and start loading pump.
- 7.7 Verify that material is flowing into compartment.
- 7.8 When material in compartment reaches the half way point, stop pump, close required valves, collect a sample and submit for verification.
- 7.9 Once sample has been verified, continue loading procedure.
- 7.10 When tanker is full, stop pump, close required valves, including tanker hand valve, open return valves, and start pump to reverse flow and remove excess product from loading hose.
- 7.11 Disconnect all hoses from tanker and let pump suck air into loading hose. Close appropriate valves and turn off pump.
- 7.12 Release hydraulic pressure on safety valve, and place dust cap on hand valve.
- 7.13 Collect final sample.
- 7.14 Close dome lid and secure lock down bolts. Close vent valve.
- 7.15 Close all valves from storage tank.
- 7.16 Submit sample for analysis.

8.0 **Duties and Responsibilities:** The Operations Manager, Laboratory Manager, and any additional designee will be responsible for supervising the activities of this SOP.

### SOP ACKNOWLEDGEMENT

I have read the attached SOP entitled Tanker Load/Unload and understand all portions.

Employee Name (Printed)

Employee Name (Signature)

Date

<b>TITLE:</b> Level: Function: Department:	Labpack Depact <u>PSC Detroit</u> <u>Environmental</u> <u>Operations</u>		Document Control: Revision Number: Issue Date: Revision Date:	<u>PSC-DET-03</u> <u>1</u> <u>October 3, 2009</u> <u>3/24/11</u> <u>3/30/11</u>
Technical Re Facility Mana	•	Date	Operations Manager	Date
Milanie EH&S Specia	<u>tichup</u> list	_ <u>3/29/1</u> Date	<b>.</b>	

#### 1.0 Purpose:

PSC Detroit receives containerized waste (including lab packs) from various customers and brokers as well as material packed by our own Lab Pack group with the purpose of processing and consolidating for volume reduction.

The purpose of this procedure is to minimize the volume of lab packs shipped out of our facility to final disposal or to other PSC TSDF and to maximize efficiency by executing safe and compatible consolidation processes.

#### 2.0 Description:

This SOP applies to containerized waste and lab packs designated for repacking or consolidation.

#### 3.0 General:

- **3.1** This SOP applies to all employees who pack, depack, repack, consolidate or pour up containers.
- 3.2 All applicable employees will be trained in the requirements of this SOP.
- 3.3 The provisions of this SOP will be strictly adhered to.
- 3.4 Prior to beginning any and all safety sensitive tasks, a Job Safety Analysis (JSA) is to be completed per PSC-ESD-JSA Policy\_0110.
- **3.5** The Operations Manger will be responsible for training of key personnel who will be responsible for training their employees.

#### 4.0 Definition:

Lab Pack – Various containers segregated by DOT Hazard Classes, packed and shipped in UN approved containers in accordance with all DOT and EPA regulations and accompanied by packing slips that list each container.

#### 5.0 Required Safety Equipment:

Hard hat, safety glasses, respirator with acid/organic vapor cartridges, steel-toed shoes or neoprene boots, solvex (green) gloves, tyvek or apron (as needed) pH paper, Oxidizer paper, Disposable plastic cups and pipettes.

#### 6.0 Depack/Repack Procedure:

- 6.1 Bring the drums from the storage area to the drum yard depacking area.
- 6.2 Carefully read the hazardous waste label on the side of the container. For lab packs, remove the packing slip from the side of the container and review to determine if the items listed are suitable for consolidation or repackaging.
- 6.3 List container numbers for containers to be depacked on process form.
- 6.4 Submit process form for review and "A" number generation.
- 6.5 Prior to placing material in container, label with appropriate storage label and initial.
- 6.6 Remove all containers from the drum and perform a compatibility (bucket) test on all liquids before consolidating. Any items that are not compatible with each other should undergo further analysis to determine the proper treatment method.
- 6.7 Further analysis includes pH, oxidizer test, water compatibility, chlorine test, etc.
- 6.8 A bucket test should be done in 5-gallon pails before being consolidated in a larger container (I.e. 30 or 55-gallon drum, tank, or rolloff bin.)
- 6.9 In the consolidation pail, be sure to include some material from the larger drum that the pail will be transferred to. This is to make sure that all containers are compatible with each other as well as with the material already in the consolidation drum/tank/bin.
- 6.10 Look for the following reactions when testing compatibility:
  - material generates heat (exothermic reaction)
  - material solidifies, polymerizes or creates a greater percentage of sludge
  - materials generate visible fumes or heavy smoke
  - any other visual abnormality
- 6.11 When pouring your pail into a consolidation drum, ensure that the bungs are open so that if the mixture generates vapors or gases they can be released in a safe manner without jeopardizing the integrity of the container.
- 6.12 Once a consolidation drum has been filled, obtain a sample using a coliwasa and an 8 oz sample jar and submit it to the lab for waste analysis along with a copy of the process form. The lab will release the container for the proper disposal category.
- 6.13 The following are the labpack hazard classes that will be utilized in the consolidation process:
  - Non-RCRA Lab Packs Solids: Bulk for landfill

Oils: Bulk for recycling Liquids: Bulk for transshipment

- RCRA Metals (Class 9, D004-D011) Solids: Bulk for stabilization Liquids: Bulk for transshipment Note: Do not place any organics in these drums
- Flammable (4.1) and Toxic (6.1) solids Solids: Consolidate for incineration
- Flammable (3) Liquids and Paints Liquids: Bulk for fuel blending Solids (remaining after bulking): Consolidate for incineration

#### • Oxidizers (5.1)

Repackage for outside disposal under incineration or treatment profile per generator's request. Bleach compounds and weak oxidizers may be consolidated into a 55 gallon poly drum following the proper compatibility procedures.

• Amines

Consolidate or repackage for incineration into a 55 gallon metal drums. Place lid and ring on drum, but do not over tighten.

#### • Corrosives (8)

Repackage like material for outside disposal under incineration or treatment profile per generator's request. Weak compounds may be consolidated into a 55 gallon poly drum following the proper compatibility procedures.

7.0 **Duties and Responsibilities:** The Operations Manager and any additional designee will be responsible for supervising the activities of this SOP.

### SOP ACKNOWLEDGEMENT

I have read the attached SOP entitled Lab Pack Depack/Repack and understand all portions.

Employee Name (Printed)

Employee Name (Signature)

Date

DCN: PSC-DET-03

### **TITLE:** Forklift Operation

Level:PSC DetroitFunction:Environmental ComplianceDepartment:Operations

Document Control:	PSC-DET-04
<b>Revision</b> Number:	1
Issue Date:	October 3, 2009
Revision Date:	3/24/11
lee 7-	- 3/30/11
<b>Operations</b> Manager	Date

Technical Review, Facility Manager Date

Tishurp 3/29/11 EH&S Specialist

#### 1.0 Purpose:

Provide instruction to ensure employees have the skills to operate a forklift in a safe and compliant manner.

#### 2.0 Description:

This SOP will set out the list of steps necessary to operate a forklift. All employees will receive fork lift training and certification prior to operating a forklift.

#### 3.0 General:

- 3.1 This SOP applies to all employees who operate a forklift.
- 3.2 All applicable employees will be trained in the requirements of this SOP.
- 3.3 The provisions of this SOP will be strictly adhered to.
- 3.4 All training will be performed by a qualified individual.
- **3.5** This person is considered qualified only after the have been fully trained and proven capable of performing this task.
- **3.6** Prior to beginning any and all safety sensitive tasks, a Job Safety Analysis (JSA) is to be completed per PSC-ESD-JSA Policy\_0110.
- **3.7** The Operations Manger will be responsible for the training of key personnel who will be responsible for training their employees.

### 4.0 **Definition:**

**Forklift** – a powered industrial truck used to lift and transport materials.

#### 5.0 Required Safety Equipment:

Proper PPE must be worn at all times. PPE includes: hard hat, safety glasses, steel toed boots and uniform at a minimum. Respirators fitted with organic vapor/acid gas cartridges should also be readily available. If the forklift is equipped with a seat belt, it must be worn.

#### 6.0 **Operating a Forklift:**

Before operating a forklift, a mandatory pre-check must be performed and documented.

- 6.1 Observe safe speed limit (10 mph in plant) at all times and sound horn at a safe distance from blind corners and doorways.
- 6.2 Be aware of fork position at all times, particularly in relation to engagement or disengagement of the load. Verify the weight of the load to be lifted is within the weight rating of the forklift.
- 6.3 Ensure that the lowest portion of the fork-load combination is maintained 6" from the ground during forklift movement.
- 6.4 Ensure unobstructed view in direction of forklift travel. If load is double stacked or view is obstructed, forklift must be driven in reverse.
- **6.5** Verify that placement of load is in accordance with stacking and storage guidelines.
- 6.6 Notify management and maintenance of any unsatisfactory forklift condition.
- 6.7 When forklift is not in use, forks should be flush with the ground, equipment turned off and parking brake engaged.
- **6.8** Employees will be re-certified every three (3) years.
- 7.0 **Duties and Responsibilities:** The Operations Manager and any additional designee will be responsible for supervising the activities of this SOP.

# 8.0 Acknowledgement:

#### SOP ACKNOWLEDGEMENT

I have read the attached SOP entitled <u>Forklift Operations</u> and understand all portions.

Employee Name (Printed)

Employee Name (Signature)

Date

DCN: PSC-DET-04

#### **TITLE:** Switcher Operations

Level:PSC DetroitFunction:Environmental ComplianceDepartment:Operations

Document Control: Revision Number: Issue Date: Revision Date:

PSC-DET-05

<u>October 3, 2009</u> 3/24/11

Operations Manager

Technical Review, Facility Manager Date

Eichus 3/29/11 EH&S Specialist

#### 1.0 Purpose:

Provide instruction to ensure employees have the skills necessary to safely operate a switcher truck.

#### 2.0 Description:

This SOP will set out the list of steps necessary to operate a switcher truck. Employees are not to operate the switcher truck until trained on this SOP and they have met all DOT requirements for operating said vehicle.

#### 3.0 General:

- 3.1 This SOP applies to all employees who operate a switcher.
- 3.2 All applicable employees will be trained in the requirements of this SOP.
- 3.3 The provisions of this SOP will be strictly adhered to.
- 3.4 All training will be performed by a qualified individual.
- **3.5** This person is considered qualified only after the have been fully trained and proven capable of performing this task.
- **3.6** Prior to beginning any and all safety sensitive tasks, a Job Safety Analysis (JSA) is to be completed per PSC-ESD-JSA Policy\_0110.
- 3.7 Employees are not to operate the switcher while wearing contaminated PPE.
- 3.8 Vehicle is to be operated on company property only.

#### 4.0 **Definition**:

Switcher –

#### 5.0 Required Safety Equipment:

If the switcher is equipped with a seat belt, it must be worn.

#### 6.0 Operating a Switcher:

Before operating a switcher, a mandatory pre-check must be performed.

- 6.1 Operator must familiarize themselves with instrumentation and controls of vehicle prior to operation. Instrumentation consists of the following:
  - Fuel gauge
  - Rear flood light switch; lights while backing and hook ups
  - Water temperature gauge
  - Oil pressure gauge
  - Voltmeter; indicates status of charging system
  - Total hour meter; verify if regular servicing has been performed
  - Tractor air supply; to release brakes
  - Headlight switch
  - Ignition switch
  - Fifth wheel lock disengage; to open jaws on fifth wheel to unlock king pin
  - Wiper switch
  - Trailer air supply; to release brakes on trailer
  - Air pressure gauge
  - Shift lever; forward/reverse
  - Hydraulic lift lever; to lift trailer up and down
- 6.2 Operator must familiarize themselves with the fluids required for this equipment. Fluids include:
  - Engine oil
  - Transmission fluid
  - Differential gear grease
  - Hydraulic oil
  - Unleaded gasoline
  - Diesel
- 6.3 After pre-check, start engine by turning ignition key to right until engine starts.
- 6.4 After short warm up period, release parking brake-push yellow knob on right hand corner of dash board.
- **6.5** With foot on brake, push shift lever forward or backward, depending on desired direction.
- 6.6 Let off brake and slowly push on gas pedal.
- 6.7 Position switcher directly in front of the trailer to be hooked.
- **6.8** Back –up slowly, using rear flood light if necessary. When fifth wheel is touching the trailer, lower the fifth wheel.
- 6.9 Lift trailer slightly as you driver under it so not to damage landing gear.
- 6.10 Back up until you hear the "click" of the king pin locking in.
- 6.11 Pull forward gently to make sure the trailer is properly locked.
- 6.12 Lift the trailer off the ground using the hydraulic ram.

- 6.13 Set parking brake.
- 6.14 Hook air supply to trailer:
  - Red line to red glad hand
  - Blue line to blue glad hand
  - Pig tail (electric line) to middle hook up.
- 6.15 Get in cab and release parking brake.
- 6.16 Put truck in forward to proceed.
- 6.17 Unhooking the trailer is the reverse of the hook up procedure, except that when finished unhooking the airlines, the fifth wheel lock should be pushed as the switcher slowly pulls forward to release the king pin.

7.0 **Duties and Responsibilities:** The Operations Manager and any additional designee will be responsible for supervising the activities of this SOP.

### SOP ACKNOWLEDGEMENT

I have read the attached SOP entitled <u>Switcher Operations</u> and understand all portions.

Employee Name (Printed)

Employee Name (Signature)

Date

DCN: PSC-DET-05

### TITLE: Container Pump Up

Level: Function: Department:	PSC Detroit Environmental Compliance Operations	Document Control: Revision Number: Issue-Date: Revision Date:	$\frac{PSC-DET-06}{1} \\ \underline{October 3, 2009} \\ \underline{3/24/11} \\ \underline{3/30/11} \\ $
Technical Re Facility Mana		Operations Manager	Date
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#### 1.0 Purpose:

Provide instruction to ensure employees have the knowledge to pump containers in a safe and compliant manner.

#### 2.0 Description:

This SOP will set out the list of necessary steps to pump-up containers. Employees are not to perform this task until trained on this SOP.

#### 3.0 General:

- 3.1 This SOP applies to all employees who pump containers.
- 3.2 All applicable employees will be trained in the requirements of this SOP.
- 3.3 The provisions of this SOP will be strictly adhered to.
- 3.4 All training will be performed by a qualified individual.
- 3.5 This person is considered qualified only after they have been fully trained and proven capable of performing this task.
- 3.6 Employees are expected to maintain proper housekeeping at all times.
- 3.7 Prior to beginning any and all safety sensitive tasks, a Job Safety Analysis (JSA) is to be completed per PSC-ESD-JSA Policy\_0110.
- **3.8** The Operations Manger will be responsible for training employees.

#### 4.0 Required Safety Equipment:

Hard hat, safety glasses, respirator with acid/organic vapor cartridges, steel-toed shoes or neoprene boots, solvex (green) gloves, tyvek or apron as needed.

#### 5.0 Pumping Containers:

Before pumping, verify that all containers have the appropriate fuel blending process codes listed on the label and that there is sufficient space in the tank to accommodate material being pumped.

- 5.1 Stage containers to be pumped in proper processing location.
- 5.2 Ensure that proper ground has been established. Attach ground strap to a conductive metal part of the container to be pumped. Check grounding at all connections by physically stressing the connections.
- **5.3** Connect hoses to stinger, pump and designated tank. Ensure that all fittings are secured.
- 5.4 Prior to pumping, open and/or close all necessary valves, ensuring proper valves are open for designated tank.
- 5.5 Write the container numbers on the process form associated with the container being generated during the consolidation.
- **5.6** Submit process form to Shipping and Receiving for review. Receiving will verify that the containers can be consolidated, date and sign the process form.
- 5.7 Once drums have been cleared by Shipping and Receiving, the consolidation procedure can begin.
- 5.8 Place hazardous waste label on the new consolidation container.
- 5.9 Conduct a bucket test for compatibility prior to pumping containers.
- **5.10** Turn on pump, remove the bung/lid of each container, insert the stinger into the liquid portion of the container and allow liquid to flow into tank.
- 5.11 Do not leave containers with material in them open for more than 15 minutes, unless material is physically being transferred to another container.
- 5.12 All containers must be RCRA empty (any and all liquid/sludge must be removed).
- **5.13** Containers must be RCRA empty prior to being placed on the empty drum trailer. If this is not feasible, the containers will be managed and disposed of based on the material they previously contained.
- **5.14** When finished, clear all hoses and pipelines of waste. Secure all valves and release the pressure in the discharge hose by opening the bleeder valve of the pump. Discharge any material into a bucket to be disposed of.
- 5.15 Disconnect all hoses from the pump and tank, utilize drain pans if necessary.
- 5.16 Drain, cap and plug all hoses and pump.
- 5.17 Properly store all equipment.
- 5.18 Record new tank measurement.
- 5.19 Make sure all remaining waste containers are properly closed and labeled.
- **5.20** All empty containers are to managed in accordance with the SOP-PSC-DET-01 (Empty Container SOP)
- 6.0 **Duties and Responsibilities:** The Operations Manager and any additional designee will be responsible for supervising the activities of this SOP.

# 7.0 Acknowledgement:

# SOP ACKNOWLEDGEMENT

I have read the attached SOP entitled Container Pump-up and understand all portions.

Employee Name (Printed)

Employee Name (Signature)

Date

DCN: PSC-DET-06

#### TITLE: Check In Procedure

Level: Function: Department:

PSC Detroit Environmental Compliance Operations

Document Control: PSC-DET-07 Revision Number: Issue Date: October 3, 2009 Revision Date: 3/24/11 Operations Manager

Technical Review. Facility Manager

Date

Lehup 3/29/11 EH&S Specialist

#### 1.0 **Purpose:**

Provide instruction to ensure employees have the knowledge to check-in containers in a safe and compliant manner.

#### 2.0 **Description:**

This SOP will set out the list of necessary steps to properly check-in containers. Employees are not to perform this task until trained on this SOP.

#### 3.0 General:

- 3.1 This SOP applies to all employees who check-in containers.
- All applicable employees will be trained in the requirements of this SOP. 3.2
- The provisions of this SOP will be strictly adhered to. 3.3
- 3.4 All training will be performed by a qualified individual.
- 3.5 This person is considered qualified only after the have been fully trained and proven capable of performing this task.
- Employees are expected to maintain proper housekeeping at all times. 3.6
- 3.7 Prior to beginning any and all safety sensitive tasks, a Job Safety Analysis (JSA) is to be completed per PSC-ESD-JSA Policy 0110.
- The Operations Manger will be responsible for training of key personnel who will 3.8 be responsible for training their employees.

#### 4.0 **Required Safety Equipment:**

Hard hat, safety glasses, respirator with acid/organic vapor cartridges, steel-toed shoes or neoprene boots, solvex (green) gloves, tyvek or apron as needed.

### 5.0 Container Check-in:

Before checking in containers, make sure receiving has provided the appropriate check-in documents in the package.

- 5.1 Verify the total piece count against what is listed on the manifests.
- 5.2 Match each container up with its corresponding manifest line item and write the waste receipt and container number on the container.
- 5.3 If piece count or labeling does not match up, contact Shipping and Receiving, who will notify Customer Service. All outside haulers are to be held until these issues are resolved.
- 5.4 Sample containers in accordance with SOP-PSC-DET-12.
- 5.5 Make notations on the receiving paperwork to help verify the waste. This includes: weight, physical description, % solids, % sludge, odor, etc.
- 5.6 Initial each container you have worked on.
- 5.7 Close all containers to manufacturer's closure specs.
- 5.8 Submit samples to laboratory for analysis.
- 5.9 Once containers have been cleared by the laboratory, Shipping and Receiving will assign the final process code and print barcodes.
- 5.10 Label each drum with the appropriate barcode label and stage for shipment or storage.

**Duties and Responsibilities:** The Operations Manager and any additional designee will be responsible for supervising the activities of this SOP.

6.0

# 7.0 Acknowledgement:

# SOP ACKNOWLEDGEMENT

I have read the attached SOP entitled Check-In and understand all portions.

Employee Name (Printed)

Employee Name (Signature)

Date

DCN: PSC-DET-07

#### **TITLE:** Tanker Sampling

Level:	PSC Detroit
Function:	Environmental Compliance
Department:	Operations

Document Control:	<u>PSC-DET-09</u>
Revision Number:	1
Issue Date:	October 3, 2009
Revision Date:	3/24/11
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Operations Manager	Datel
L	

Technical Review, Facility Manager Date

EH&S Specialist

#### 1.0 Purpose:

Bulk waste liquids are shipped from the facility and received by the facility in tanker trucks. This procedure identifies the steps to properly collect a sample of these tanker trucks.

#### 2.0 Description:

This SOP will set out the list of steps necessary to sample all bulk tanker shipments at the facility. It will also describe the necessary equipment for performing these functions.

#### 3.0 General:

- **3.1** This SOP applies to all employees who sample tanker trucks.
- 3.2 All applicable employees will be trained in the requirements of this SOP.
- 3.3 The provisions of this SOP will be strictly adhered to.
- **3.4** All sampling operations will be performed by a qualified individual in attendance at all times.
- **3.5** This person is considered qualified only after they have been fully trained and proven capable of performing this task.
- **3.6** Prior to beginning any and all safety sensitive tasks, a Job Safety Analysis (JSA) is to be completed per PSC-ESD-JSA Policy\_0110.
- **3.7** The Operations Manger will be responsible for training of key personnel who will be responsible for training their employees.

#### 4.0 Definition:

**Bulk/tanker truck** – a motor vehicle designed to carry liquefied loads, dry bulk cargo or gases on roads. The largest such vehicles are similar to railroad tank cars which are also designed to carry liquefied loads. Many variants exist due to the wide variety of liquids that can be transported. Tank trucks tend to be large; they may be insulated or non-insulated; pressurized or non-pressurized; and designed for single or multiple loads. **Sample Bomb** – a device attached to a chain that is used to collect a sample of a bulk material.

**Coliwasa** – (Composite Liquid Waste Sampler) usually a tube with a stainless steel rod down the center and plunger at the end

#### 5.0 Required Safety Equipment:

Required safety equipment includes rubber gloves, hard hat, safety glasses, steel toe boots, face shield, work uniform and apron as a minimum. Respirators fitted with organic vapor/acid gas cartridges will also be worn when on top of the tanker when dome lid is open. Additionally, a 5 gallon pail should be used to carry necessary sampling equipment: cleaning rag, sample jar and lid, marking instrument.

#### 6.0 Sampling Waste Tankers Method 1 (Sample Bomb)

- 6.1 Ensure that tanker is chocked prior to performing this task.
- 6.2 With rubber gloves off (tucked under arm or through tool belt) climb the ladder to the dome of trailer. Bring required sampling materials.
- 6.3 Secure fall protection.
- 6.4 Relieve pressure or vacuum of vessel via pressure relief valve. If unable to locate decompression valve, do not attempt to open tanker dome. Immediately contact supervisor for further instruction.
- 6.5 Loosen the dome by turning alternate dome toggle bolts counter clock wise and rotating them away from the dome bolt bracket. Complete loosening of the remaining toggle bolts and rotating them away from the dome toggle bolt brackets. Slowly lift up on the dome. Swing open dome and gently lay it on the trailer body.
- 6.6 Put on rubber sampling gloves.
- 6.7 Lower the sample bomb with sash chain to the bottom of the trailer (watch for slack in the chain).
- 6.8 Raise the sample bomb swiftly, twelve to eighteen inches, and allow gravity to slowly lower the sample bomb to near its original position. Repeat this step several times. As the sample bomb is swiftly raised, liquid is forced through the top of the bomb, filling the reservoir. An additional lift forces liquid through the cavity of the bomb and out the bottom.
- 6.9 Slowly pull bomb from the tanker and pour liquid from the bomb into a sample jar, filling the jar. Close sample jar.
- 6.10 Use cleaning rag to wipe sample jar, bomb, and gloves.
- 6.11 Remove sampling gloves.

- 6.12 Close and secure domes, wipe off any residue.
- 6.13 Release fall protection.
- 6.14 Climb down ladder with supplies.
- 6.15 Label sample with identifying information and deliver to laboratory.

#### 7.0 Sampling Waste Tankers Method 2 (COLIWASA)

- 7.1 Ensure that tanker is chocked prior to performing this task.
- 7.2 With rubber gloves off (tucked under arm or through tool belt) climb the ladder to the dome of trailer. Bring required sampling materials.
- 7.3 Secure fall protection.
- 7.4 Relieve pressure or vacuum of vessel via pressure relief valve. If unable to locate decompression valve, do not attempt to open tanker dome. Immediately contact supervisor for further instruction.
- 7.5 Loosen the dome by turning alternate dome toggle bolts counter clock wise and rotating them away from the dome bolt bracket. Complete loosening of the remaining toggle bolts and rotating them away from the dome toggle bolt brackets. Slowly lift up on the dome. Swing open dome and gently lay it on the trailer body.
- 7.6 Put on rubber sampling gloves.
- 7.7 Open valve on Coliwasa.
- **7.8** Insert coliwasa through open dome until bottom of the tanker is reached. If the coliwasa does not reach the bottom of the tanker due to a heel, notify supervisor of approximate depth of heel.
- 7.9 After several second, close the ball valve of the coliwasa.
- 7.10 Draw up the coliwasa and place lower end in sample jar opening.
- 7.11 Partially open ball valve to fill sample jar. Close ball valve when sample jar is full. Close sample jar.
- 7.12 Use cleaning rag to wipe sample jar, coliwasa and gloves.
- 7.13 Remove sampling gloves.
- 7.14 Close and secure domes, wipe off any residue.
- 7.15 Release fall protection.
- 7.16 Climb down ladder with supplies.
- 7.17 Label sample with identifying information and deliver to laboratory.
- **8.0 Duties and Responsibilities:** The Operations Manager and any additional designee will be responsible for supervising the activities of this SOP.

# 9.0 Acknowledgement:

#### SOP ACKNOWLEDGEMENT

I have read the attached SOP entitled Tanker Sampling and understand all portions.

Employee Name (Printed)

Employee Name (Signature)

Date

DCN: PSC-DET-09

TITLE:	Hazardous Debris (	Consolidation		
Level:	PSC Detroit		Document Control:	PSC-DET-10
Function:	Environmental Con	npliance	Revision Number:	1
Department:	Operations		Issue Date:	<u>October 13, 2009</u>
		4	Revision Date:	3/24/11
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#### 1.0 Purpose:

The purpose of this procedure is to minimize the volume of containers shipped out of our facility and to maximize efficiency by executing safe and compatible consolidation processes.

#### 2.0 Description:

This SOP applies to containerized waste and any other type of waste that that has been designated for consolidation.

#### 3.0 General:

- 3.1 This SOP applies to all employees who depack or consolidate containers.
- 3.2 All applicable employees will be trained in the requirements of this SOP.
- 3.3 The provisions of this SOP will be strictly adhered to.
- **3.4** Prior to beginning any and all safety sensitive tasks, a Job Safety Analysis (JSA) is to be completed per PSC-ESD-JSA Policy\_0110.
- 3.5
- **3.6** The Operations Manger will be responsible for training of key personnel who will be responsible for training their employees.

#### 4.0 **Definition:**

**Roll off** – Roll-Off containers have a rectangular footprint typically determined by the size of typical trucks. Roll off container sizes are determined by the amount of cubic yards of debris they contain.

Hazardous Debris – Dumpable material such as PPE, filters, wipes, rags, wood, etc. that

has been contaminated with hazardous waste.

# 5.0 Required Safety Equipment:

Hard hat, safety glasses, dust mask (upgraded to respirator with acid/organic vapor cartridges if needed), steel-toed boots, apron and chemical resistant gloves. Other equipment should include: Roll off box, forklift.

### 6.0 Consolidation Procedure:

Equipment required for this procedure should include: Roll-off box, forklift, liners, shovels, floor dry, caulk and appropriate closure materials.

- 6.1 Prepare roll-off by ensuring that it is sealed and lined.
- 6.2 Bring the drums from the storage area to the consolidation staging area.
- 6.3 Carefully read the barcode label on the side of the container, noting the process code. If the process code is anything other than INC13, INC16, or INC17, verify with supervisor that the material is compatible.
- 6.4 Write the container numbers on the process form associated with the roll off box that is being used for consolidation.
- 6.5 Submit process form to Shipping and Receiving for review. Receiving will verify that the containers can be consolidated, date and sign the process form.
- 6.6 Once drums have been cleared by Shipping and Receiving, the consolidation procedure can begin.
- 6.7 Place hazardous waste label on the roll off.
- 6.8 Open containers in the staging area, verifying contents.
- 6.9 Forklift operator will verify contents and pick up the drums to be dumped.
- 6.10 Forklift operator will dump containers into roll off.
- 6.11 Empty containers should be placed in the appropriate location for verification.
- 6.12 Repeat steps 6 through 11 until box is full, periodically packing material in the box to maximize space.
- 6.13 When consolidation is complete, close roll off to DOT closure specs in preparation for shipment.
- 7.0 **Duties and Responsibilities:** The Operations Manager and any additional designee will be responsible for supervising the activities of this SOP.

# 8.0 Acknowledgement:

# SOP ACKNOWLEDGEMENT

I have read the attached SOP entitled <u>Hazardous Debris Consolidation</u> and understand all portions.

Employee Name (Printed)

Employee Name (Signature)

Date

DCN: PSC-DET-10

#### PSC Environmental Services STANDARD OPERATING PROCEDURES

# TITLE: Container Sampling

Level: Function: Department:	PSC Detroit Environmental Operations	Compliance	Document Control: Revision Number: Issue Date: Revision Date:	PSC-DET-12 <u>1</u> July 29, 2010 <u>3/24/11</u> <b>2/2</b>
Technical Rev Facility Mana	•	Date	Operations Manager	<u></u>
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EH&S Specialist

#### 1.0 Purpose:

Waste liquids and solids are shipped from the facility and received by the facility in various sized containers. This procedure identifies the steps to properly collect a sample of these containers.

#### 2.0 Description:

This SOP will set out the list of steps necessary to sample container shipments at the facility. It will also describe the necessary equipment for performing these functions.

## 3.0 General:

- 3.1 This SOP applies to all employees who sample containers.
- 3.2 All applicable employees will be trained in the requirements of this SOP.
- **3.3** The provisions of this SOP will be strictly adhered to.

Date

- **3.4** All sampling operations will be performed by a qualified individual in attendance at all times.
- **3.5** This person is considered qualified only after the have been fully trained and proven capable of performing this task.
- **3.6** Prior to beginning any and all safety sensitive tasks, a Job Safety Analysis (JSA) is to be completed per PSC-ESD-JSA Policy\_0110.
- **3.7** The Operations Manger will be responsible for training of key personnel who will be responsible for training their employees.

#### 4.0 Definition:

#### Sample Stick/Drum Thief- PVC tube

#### 5.0 Required Safety Equipment:

Required safety equipment includes rubber gloves, hard hat, safety glasses, steel toe boots, face shield, work uniform and apron as a minimum. Respirators fitted with organic vapor/acid gas cartridges will also be worn when the containers are open. Additionally, operators should have the necessary sampling equipment: sample stick, scoop, cleaning rag, sample jar and lid, marking instrument.

#### 6.0 Sampling Waste Containers

- 6.1 Adorn the appropriate safety equipment prior to opening or inspecting a container.
- 6.2 Inspect the container for any integrity issues, including outside damage or leakage. Note any signs that a container is pressurized. If pressurization is suspected, Do Not attempt to open or release, contact your supervisor for instructions on how to proceed.
- **6.3** Open the desired containers and visually inspect for irregularities such as: syringes, medical waste, metallic powder, bubbling, smoking or pungent odors. Irregularities should be reported to your Supervisor before proceeding with the sampling process.
- 6.4 Verify that the material in the container corresponds to the receiving paperwork, note any inconsistencies and provide the initial process code (based on visual inspection only)
- 6.5 Extract a sample for lab analysis and verification.
  - **6.5.1** For liquids/sludges- use a clean sample stick to draw an equal portion from each container to be represented in the 10% composite and place it in an 8 oz sample jar.
  - **6.5.2** For solid material- use the grab method to obtain a representative sample or chip off a sample sized piece with available tools.
  - **6.5.3** Loosepacks/Labpacks-verify inner containers correspond to receiving paperwork.
- 6.6 If it is determined that non-conforming material is present at any point in this process, contact your Supervisor immediately for guidance on how to proceed.
- 6.7 Upon completion of sampling, deliver samples and corresponding paperwork to laboratory for analysis.
- 7.0 **Duties and Responsibilities:** The Operations Manager and any additional designee will be responsible for supervising the activities of this SOP.

# SOP ACKNOWLEDGEMENT

I have read the attached SOP entitled Container Sampling and understand all portions.

Employee Name (Printed)

Employee Name (Signature)

Date

Section 7

Closure & Postclosure Plan (A11 & A12)

## FORM EQP 5111 ATTACHMENT TEMPLATE A11 CLOSURE AND POSTCLOSURE CARE PLANS

The administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, (Act 451), R 299.9613 and Title 40 of the Code of Federal Regulations (CFR), Part 264, Subpart G, establishes requirements for the closure and, if necessary, postclosure care of hazardous waste management facilities. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003. This license application template addresses requirements for the proper closure and, if necessary, postclosure care of the hazardous waste management units and the hazardous waste management facility for the Petro-Chem facility located in Detroit, Michigan. The information provided in this template was used to prepare the closure and postclosure care cost estimate provided in Template A12, "Closure and Postclosure Care Cost Estimates."

Samples collected by the facility for waste characterization and environmental monitoring during closure and postclosure care activities will be collected, transported, analyzed, stored, and disposed by trained and qualified individuals in accordance with the QA/QC Plan. The QA/QC Plan includes written procedures outlined in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication SW-846, Third Edition, Chapter 1 (November 1986), and its Updates.

## A11.A CLOSURE PLAN

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   Hazardous Waste Management Unit Information
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  - A11.A.5(a) Closure of Container Storage Areas
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  - A11.5.A(f) Closure of Incinerators
  - A11.5.A(g) Closure of Miscellaneous Units
  - A11.5.A(h) Closure of Boilers and Industrial Furnaces
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- A11.A.6 Certification of Closure
- A11.A.7 Postclosure Notices Filed
- A11.B POSTCLOSURE CARE PLAN
  - A11.B.1 Applicability
  - A11.B.2 Postclosure Care Objectives
  - A11.B.3 Postclosure Care Period Point of Contact
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     Postclosure Monitoring and Maintenance
  - A11.B.5 Postclosure Care Plan Amendment
  - A11.B.6 Certification of Postclosure

## A11.A CLOSURE PLAN

# A11.A.1 Closure Performance Standard

[R 299.9613 and 40 CFR §264.111]

This Closure Plan is designed to ensure that the facility will be closed in a manner that achieves the following:

- a. Minimizes the need for further maintenance; and
- b. Controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, postclosure escape of hazardous wastes, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition byproducts to the groundwater, surface water, or atmosphere; and, as applicable
- c. Complies with the unit-specific closure requirements for each of the following units:

(Check as appropriate)

Use and management of containers	R 299.9614 and 40 CFR §264.178
⊠ Tank systems	R 299.9615 and 40 CFR §264.197
Surface impoundments	R 299.9616 and 40 CFR §264.228
☐ Waste piles	R 299.9617 and 40 CFR §264.258
Land treatment <sup>a</sup>	R 299.9618 and 40 CFR §264.280
Landfill	R 299.9619 and 40 CFR §264.310
Incinerators	R 299.9620 and 40 CFR §264.351
☐ Drip pads <sup>b</sup>	R 299.9621 and 40 CFR §264.575
Miscellaneous units	R 299.9623 and 40 CFR §§264.601-603
$\hfill\square$ Hazardous waste munitions and explosive storage ${}^{\mbox{\tiny b}}$	R 299.9637 and 40 CFR §264.1202
Boilers and industrial furnaces	R 299.9808 and 40 CFR §266.102(e)(11)
<sup>a</sup> Not included in the template <sup>b</sup> Not yet included in 40 CFR §264.111; therefore not consider	red

Unit-specific closure procedures are discussed in Section A11.A.5 of this template for each unit type indicated above.

# A11.A.2 Unit-Specific Information

[R 299.9613 and 40 CFR §§264.112(b)(3) and (6)]

## Table A11.A.1 Hazardous Waste Management Units Information

The following table identifies each hazardous waste management unit at the Petro-Chem facility subject to the closure requirements of this hazardous waste management facility operating license. The table also includes: each unit's maximum licensed hazardous waste inventory, a list of the waste codes managed in the unit, the anticipated date of closure (if known), and the estimated duration of closure activities once closure begins. Unit-specific methods for closure and detailed schedules are discussed in Section 11A.5 of this template.

Unit Designation	Maximum Inventory (Include Units)	Waste Codes of Hazardous Wastes Managed	Scheduled Closure Date	Estimated Duration of Closure
CMB Storage Areas, pump room, lab pack, staging/QC	3,888 drums	See Appendix 1	Unknown	To be determined
CMB Rolloff	8,080 gallons	See Appendix 1	Unknown	To be determined
QAQC Area	675 drums	See Appendix 1	Unknown	To be determined
CMB-2 Storage/ pump transfer room	854 Drums	See Appendix 1 and Appendix 2	Unknown	To be determined
CMB TK 001	6,000 gallons	See Appendix 2	Unknown	To be determined
CMB TK 002	6,000 gallons	See Appendix 2	Unknown	To be determined
Tank System 1	420,000 gal.	See Appendix 2	Unknown	To be determined
Tank System 2	168,000 gal.	See Appendix 2	Unknown	To be determined
1 <sup>st</sup> Floor Operations (North Storage)	700 drums	See Appendix 1	Unknown	To be determined
TS-1 Transfer Pad	54,000 gal.	See Appendix 1 and Appendix 2	Unknown	To be determined
TS-2 Transfer Pad	24,000 gal	See Appendix 1 and Appendix 2	Unknown	To be determined

Unit Designation	Maximum Inventory (Include Units)	Waste Codes of Hazardous Wastes Managed	Scheduled Closure Date	Estimated Duration of Closure
TS-3 Transfer Pad	145 drums	See Appendix 1	Unknown	To be determined
Drum Dock 2	73 drums	See Appendix 1	Unknown	To be determined
Drum Dock 3 (Truck Well)	300 drums	See Appendix 1	Unknown	To be determined
Drum Dock 4 (Truck Well)	147 drums	See Appendix 1	Unknown	To be determined
SBS Tote Storage Building	127 drums	See Appendix 1	Unknown	To be determined
SBS Dock Storage Area	368 drums	See Appendix 1	Unknown	To be determined
SBS Solids Area	73 drums	See Appendix 1	Unknown	To be determined

\* drum = 55-gallon capacity equivalent

# A11.A.3 Schedule of Final Facility Closure

[R 299.9613 and 40 CFR §264.112(b)(6)]

The Petro-Chem facility:

Anticipates completing final closure of the entire facility by *[insert estimated date]* 

Has not determined when the facility will close and does not anticipate completing final closure of the entire facility prior to expiration of the facility's hazardous waste operating license.

Detailed Closure Schedule for Facility Closure: Provide a detailed breakdown showing the closure schedule with the anticipated time of completion for each activity below.

Closure Activity	Time Completed	
Initiate Closure;	Immediate	
Cease Acceptance of Waste		
Process Containers in Storage Areas	1 Week	
Transfer other containers off-site for	6 Weeks	
disposal/recycling		
Decontaminate and Remove Equipment in	1 Week	
Pump Room(s)		
Decontaminate and Remove Equipment in	1 Week	
		2/12/

Closure Activity	Time Completed
Lab Pack Room	
Decontaminate Pumping Room	1 Week
Decontaminate Surfaces in Container Storage	2 Weeks
Transfer bulk wastes off-site to cement	6 Weeks
kiln/incinerator	
Decontaminate and Remove Pumps, Piping	8 Weeks
and Other Equipment	
Decontaminate and Remove Tanks	6 Weeks
Decontaminate Containment Area Surfaces	7 Weeks
Sample Containment Area Surfaces	2 Weeks
Obtain P. E. Certification of Closure	7 Weeks
Performance	
Prepare and Submit Closure Report to	9 Weeks
MDNRE	

# A11.A.4 Notification and Time Allowed for Closure

[R 299.9613 and 40 CFR §§264.112(d)(2) and 264.113(a) and (b)]

Final closure activities will be initiated within 90 days of receipt of the final volume of hazardous wastes and completed within 180 days of receipt of the final volume of waste. The tasks and estimated time required for closure shall follow the schedule specified in Section 11A.3. The Director will be notified by Petro-Chem facility <u>60</u> days before final closure begins. Final closure will be certified by both Petro-Chem facility and an independent, qualified, registered professional engineer of the state of Michigan.

## A11.A.4(a) Extensions for Closure Time

[R 299.9613 and 40 CFR §264.113(a) and (b)]

In the event that an extension for closure for the facility or any unit is necessary, the Petro-Chem facility will request an extension in accordance with the requirements of 40 CFR §264.113(a).

## A11.A.5 Unit-Specific Closure Procedures

Unit-specific closure procedures are provided for each unit identified in Section A11.A.2 of this template.

#### **GUIDANCE/REFERENCES**

- Part 201, Environmental Remediation, of Act 451. September 1996.
- Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW 846, Update III plus Variations. December 1996. EPA

#### A11.A.5(a) Closure of Container Storage Areas [R 299.9614 and 40 CFR §264.178]

This section describes the procedures for closure of all container storage areas listed above. The general closure requirement and specific closure procedures are discussed below.

#### A. <u>General Closure Requirement</u>

At closure, all hazardous waste and hazardous waste residues will be removed from the containment system. Remaining containers, liners, bases, and soil containing or contaminated with hazardous waste or hazardous waste residues will be decontaminated or removed.

#### B. Specific Closure Procedures

Specific procedures for inventory management, unit inspection, decontamination, sampling and analysis, and additional waste management are discussed below.

1. Inventory and Remedial Waste Management Procedures

A physical inventory check of all containers in storage will be completed and verified with the Preview system. All lab pack and loose pack wastes will be depacked and consolidated as appropriate. All fuel type wastes will be blended into the appropriate Tank Systems for transportation off-site for energy recovery. All remaining containerized wastes will be shipped off-site for disposal and/or recycling.

Any remediation wastes will be characterized for disposal and managed in accordance with Parts 111, 115 and 121 of Act 451, as appropriate. The facility will follow existing representative sampling procedures described in the waste analysis plan.

2. Unit Inspection Procedures

A detailed inspection of each containment pad and wall will be completed. The inspection will document the location of spills, contamination, and migration pathways. A similar inspection of the exterior walls of each containment pad will also be performed and documented.

3. Decontamination Procedures

After inventory removal, the container management unit floors will be decontaminated. A surface cleaning technique (hydroblasting) will be used to decontaminate the surfaces of the concrete floors. The wash water and debris from the treatment is collected and separated. The solid material is drummed for incineration or landfilling (in accordance with hazardous waste regulations), and the water is recycled or collected for eventual bulk transportation to a permitted RCRA facility for proper management. All waste shall be properly manifested, labeled, and shipped as required by hazardous waste regulations. These cleaning methods require a 3-man crew, high pressure pumps, and wash water holding tanks. Personnel operating the treatment equipment require additional personal protection equipment due to the inherent hazards in this cleaning method. Where appropriate, temporary run-off controls will be implemented to contain wash water.

Following the surface treatment, a sample of the final water rinsate will be collected for analysis and comparison to the performance standards and disposed of appropriately, i.e. disposal off site at an industrial waste water facility, hazardous waste facility or discharge to the local POTW with approval. In addition, concrete cores will be collected from the floors of the container management units. The samples will be collected at the density specified in the MDEQ guidance document, "Guidance Document for Verification of Soil Remediation", treating each unit as a "small site".

Based on the square footage of each containment unit, the following numbers of sample locations are planned:

Container Management Unit	Approximate Area (sq. ft.)	Number of Samples		
CMB Pump Room	2,430	5		
CMB, Staging/QC	19,900	15		
Lab pack Processing	2,500	6		
QAQC Container Storage	3,108	7		
CMB2 Container Storage and CMB2 QAQC area	7,040	10		
CMB2 Pump Transfer	2,000	5		
SBS Container Storage Area	1,311	4		
SBS Dock Storage	420	2		
SBS Solids Area	512	2		
Loading/Unloading				
Docks:				
Container Management Unit	Approximate Area (sq. ft.)	Number of Samples		
Dock #2	3,300	7		
Dock #3	770	3		
Dock #4	1,400	4		
TS1 Transfer Pad	1,720	5		
TS2 Transfer Pad	2,440	6		
TS3 Transfer Pad	1,300	4		
TS4 Transfer Pad	2,720	6		

## 4. Sampling and Analysis Procedures

Sampling will be biased toward visibly stained locations, since these locations should represent the greatest possibility for discovering residual contamination. These cores will be analyzed for volatile organic compounds and semi-volatile organic compounds to demonstrate that the concrete has been decontaminated. The coring and sampling requires specialized equipment and a 2-man crew.

Soil samples will also be collected from beneath each of the concrete core locations using a stainless-steel hand auger that will be decontaminated between sample

locations. One sample will be collected from each location at the 0-1 foot depth below the concrete surface and transferred directly into appropriate containers and stored in ice packed coolers for transportation to the laboratory. Soil samples for VOC analysis will be preserved in the field with methanol per EPA Methods as stipulated in the *MDEQ Remediation and Redevelopment Division (RRD) Operational Memorandum No. 2.* The soil samples will be analyzed for volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs). The results will be compared to the Generic Part 201 Cleanup Criteria. Sampling and analysis will follow SW-846 sampling and analytical methods when appropriate. Analytical sampling parameters will be based on the hazardous wastes and constituents managed in the units.

5. Additional Waste Management Procedures

Decontamination waste sand materials that cannot be decontaminated will be characterized, containerized and shipped off-site for disposal and/or recycling.

Prior to initiating decontamination procedures, the site will be 'prepped' to maintain runon and run-off control. The facility connection to the Detroit sewer collection system will be closed to prevent unintended contaminated liquids to enter the system. All portable equipment to be decontaminated will be moved to an existing container management unit(s) prior to initiating the decontamination process to prevent run-off of rinsates. Plastic sheeting or other suitable barrier will be erected along the containment wall where necessary to contain any overspray within the secondary containment structure.

All portable/dismantled decontaminated equipment/structures will be moved to a decontaminated bermed containment area away from the decontamination areas to prevent run-on of contaminated liquid. All sheeting will be containerized and transported off-site as a hazardous waste. All barriers utilized will be decontaminated and transported off-site to a metal recycler or solid waste disposal facility.

The groundwater monitoring wells will be sampled prior to initiating the closure activities and following completion of all closure activities. The samples will be tested as per the Facility's approved groundwater monitoring program.

#### A11.A.5(b) Closure of Tank Systems [R 299.9615 and 40 CFR §264.197]

This section describes the procedures for closure of all of the tank units listed above. The general closure requirement and specific closure procedures are discussed below.

## A. General Closure Requirement

At closure of the tank system, the Petro-Chem facility will remove or decontaminate all waste residues, contaminated containment system components (liners, etc.), contaminated soils, and structures and equipment contaminated with waste, and manage them as hazardous waste, unless 40 CFR §264.3(d) applies. If the Petro-Chem facility demonstrates that not all contaminated soils can be practicably removed or decontaminated, then the tank system will be managed in accordance with the closure and postclosure care requirements that apply to landfills.

#### B. Specific Closure Procedures

Specific procedures for inventory management, unit inspection, decontamination, sampling and analysis, and additional waste management are discussed below.

1. Inventory and Remedial Waste Management Procedures

All flowable wastes from each tank and piping system will be transported off-site for energy recovery or incineration. Stormwater collected from the containment will be tested for possible pretreatment and discharge, if appropriate, to the Detroit sewer collection system.

2. Unit Inspection Procedures

A detailed inspection of each containment pad and wall will be completed. The inspection will document the location of spills, contamination and migration pathways. A similar inspection of the exterior walls of each containment pad will also be performed and documented.

3. Decontamination Procedures

Tanks and associated piping will then be flushed with appropriate compatible cleaning solutions to reduce any liquid, solid or clinging waste residues. The resulting residues will either be collected into tanks with other compatible wastes and sent to a suitably permitted recycling facility, or transported off site to authorized facilities for reclamation, treatment and/or disposal at other authorized facilities consistent with the treatment standards for the hazardous or toxic constituents of the waste.

The piping systems will then be detached from the tank. Specific components of the piping system may be reused in place or in similar service upon decontamination. The remaining components of the piping system will then either be decontaminated on site utilizing methods described in Table 1 of 40 CFR 268.45, using other appropriate decontamination methods, or transported off site for treatment and/or disposal. Residues of the decontamination will be collected either into on-site tankage or into containers for off-site transfer for reclamation, treatment and/or disposal at authorized facilities based upon the treatment standards for the waste and its hazardous or toxic constituents. Piping system equipment not reused onsite or decontaminated to the requirements of this plan will be placed into containers and transported offsite to an authorized facility for reclamation, treatment and/or disposal.

After removal of the tanks, piping, and auxiliary equipment, and before decontamination, the concrete containment structures will be visually inspected to identify any cracks, gaps, spills, stains, or damaged areas which may be present. This visual inspection will be documented in the Closure Certification with notations of any identified problems. Any cracks, gaps, or damaged areas with the potential to provide leakage pathways will be temporarily repaired by grouting or sealing before decontamination is performed in order to prevent potential release of contamination into the underlying soils. These temporarily repaired areas will be examined and sampled following decontamination.

The secondary containment pads will be decontaminated using the same method for the container storage areas after all equipment and tanks have been removed.

Contaminated equipment attached directly to the tanks may be reused on site on other tanks containing compatible wastes after decontamination. Tank interiors may be decontaminated by methods described in Table 1 of 40 CFR 268.45, or by appropriate washing using detergents compatible with the hazardous or toxic constituents. These operations will be performed within containment to prevent migration of hazardous constituents to other tanks or structures or the environment. Tanks and attached equipment not decontaminated to the requirements of this plan will be rendered unusable by cutting into pieces and/or collapsing. The material will then be containerized, and transported off site for reclamation, treatment, storage or disposal at an authorized facility based upon the treatment standards for the hazardous waste or hazardous or toxic constituents. Decontaminated tanks may be returned to nonregulated service, be transferred off site for reuse, or be rendered unusable and transported off site for reclamation or disposal.

Waste residues will be removed from tanks and appurtenances by flushing and steam cleaning. Steam cleaning is a proven technique for decontaminating surfaces and mobilizing heavier liquids. Because the high operating temperatures may vaporize some volatile constituents, appropriate safety precautions (ventilation, vapor masks) and vapor recovery may be employed. The steam condensate will be collected for eventual transportation to a permitted RCRA facility. A sample of the final rinsate for each tank management unit will be retained for comparison to the performance standards.

At the time of closure, a determination will be made if the equipment will be sold for reuse or for scrap. If the equipment is destined for scrap, the tanks and appurtenances will be dismantled and cut up using appropriate cutting equipment. The dismantled equipment will be sold for scrap, although this potential benefit was not considered in the closure cost. At the time of closure, a scrap company will be selected and certifications will be obtained from the scrap dealer to verify that the equipment and materials have been appropriately recycled.

#### 4. Sampling and Analysis Procedures

Any soils determined to be contaminated will be removed and transported offsite to a treatment or disposal facility licensed to accept wastes described by the waste codes of the source of the contamination. Any concrete to be removed will be broken up using dust suppression techniques such as water spray. Soils will be removed using normal construction equipment, including front end loaders and back hoes, and loaded into transportation vehicles until sampling and analysis, as described in demonstrates conformance with the closure performance standard. Spilled material will be manually cleaned up and returned to the loaded vehicles.

Equipment used to perform the decontamination, that has had contact with contaminated surfaces or soils, will be decontaminated in a manner to prevent the spread of hazardous waste and constituents. Tools, hoses and small equipment will be washed with water and detergents, and rinsed with water, inside containers to remove visible residues and soil. A temporary steel or plastic lined containment area will be installed to decontaminate large equipment, using water/detergent spray and water rinse until visible soils and residues are removed. The used wash and rinse waters will be collected into containers, tanks, or directly into transportation vehicles, and transported offsite treatment facilities licensed to accept the codes applicable to the waste contaminating the soil or debris.

The same procedures used to remove waste residues from the Container Management Units will be used in the Tank Management Units. Following the concrete surface treatment, concrete cores will be collected from the floor of each tank management unit according to the following table.

Tank Management Unit	Approximate Area (sq. ft.)	Number of Samples
Tank System 1 <i>(West</i> <i>Tank Farm)</i>	6,510	8
Tank System 2 (formerly SBS Tank Farm)	3,900	6
CMB Tanks 1 & 2	900	3

5. Additional Waste Management Procedures

Waste management procedures are described in the above section. There are no additional waste management procedures.

## A11.A.5(c) Closure of Surface Impoundments

[R 299.9616 and 40 CFR §264.228(a)(1) and (2)]

The facility does not operate any hazardous waste surface impoundments. Therefore, this section which describes the procedures for closure of surface impoundments is not applicable.

## A11.A.5(d) Closure of Waste Piles

[R 299.9617 and 40 CFR §264.258]

The facility does not operate any hazardous waste piles. Therefore, this section which describes the procedures for closure of waste piles is not applicable.

# A11.A.5(e) Closure of Landfills

[R 299.9619 and 40 CFR §264.310(a)]

The facility does not operate any hazardous waste landfills. Therefore, this section which describes the procedures for closure of landfills is not applicable.

## A11.A.5(f) Closure of Incinerators

[R 299.9620 and 40 CFR §264.351]

The facility does not operate any hazardous waste incinerators. Therefore, this section which describes the procedures for closure of hazardous waste incinerators is not applicable.

#### A. General Closure Requirement

This section is not applicable, the facility does not operate an incinerator.

#### B. Specific Closure Procedures

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This section is not applicable, the facility does not operate an incinerator.

## A11.A.5(g) Closure of Miscellaneous Units

[R 299.9623 and 40 CFR §§264.601 through 264. 603]

The facility does not operate any hazardous waste miscellaneous units. Therefore, this section which describes the procedures for closure of miscellaneous units is not applicable.

## A11.A.5(h) Closure of Boilers and Industrial Furnaces (BIF)

[R 299.9808 and 40 CFR §266.102(e)(11)]

The facility does not operate any hazardous waste boilers or industrial furnaces. Therefore, this section which describes the procedures for closure of hazardous waste boilers or industrial furnaces is not applicable.

## A11.A.5(i) Other Closure Activities

[R 299.9504(1)(c), R 299.9508(1)(b), and R 299.9613(1) and 40 CFR  $\S$ 270.14(b)(13) and 264.112(b)(5)}

The facility has not identified any other activities necessary to ensure that closure satisfies the performance standard, as appropriate. If the facility's environmental monitoring program is still in place at the time of closure, a final round of sampling will be done to verify that the site meets relevant standards.

#### A11.A.6 Certification of Closure [R 299.9613]

Within 60 days of completion of closure the Petro-Chem facility will submit to the Director, by registered mail, a certification that the hazardous waste management unit or facility, as applicable, has been closed in accordance with the specifications in the approved closure plan. The certification will be signed by a Petro-Chem representative and by an independent registered professional engineer. Documentation supporting the independent registered engineer's certification will be furnished to the Director in accordance with R 299.9613(3), including:

- 1. The results of all sampling and analysis;
- 2. Sampling and analysis procedures;
- 3. A map showing the location where samples were obtained;
- 4. Any statistical evaluations of sampling data;
- 5. A summary of waste types and quantities removed from the site and the destination of these wastes; and
- 6. If soil has been excavated, the final depth and elevation of the excavation and a description of the fill material used.

The Petro-Chem facility will maintain financial assurance for closure until the Director releases the Petro-Chem facility from the financial assurance requirements for closure under R 299.9703.

The facility will certify closure documents as follows:

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 be 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.

#### A11.A.7 Postclosure Notices Filed

[R 299.9504(1)(c) and R 299.9508(1)(b) and 40 CFR §270.14(b)(14)]

The applicant will provide documentation that the postclosure notices required under 40 CFR §264.119 have been filed for hazardous waste disposal units that have been closed at the facility.

# A11.B POSTCLOSURE PLAN

[R 299.9613 and 40 CFR §264.118]

The facility has not identified any post closure care, planned monitoring or maintenance activities. Therefore, section A11.B is not applicable.

#### A11.B.1 Applicability

Not applicable: Hazardous waste will not be left behind at closure. A survey plat, postclosure care, postclosure certifications, and other notices are not required.

#### Applicable:



Contingent plan Landfill unit

#### FORM EQP 5111 ATTACHMENT TEMPLATE A12 CLOSURE AND POSTCLOSURE CARE COST ESTIMATES

The administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), R 299.9702 and Title 40 of the Code of Federal Regulations (CFR), Part 264, Subpart H, establishes requirements for providing financial assurance for closure and, if necessary, postclosure care. Specifically, R 299.9702(1) requires the preparation of associated cost estimates. This license application template addresses the requirement for preparing a closure cost estimate and, if necessary, a postclosure care cost estimate. The cost estimates provided in this attachment are based on the closure and postclosure care activities detailed in Template A11. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003.

This template is organized as follows:

- A12.A CLOSURE COST ESTIMATE A12.A.1 Closure Cost Estimate Breakdown Table A12.A.1 Facility Closure Cost Estimate Breakdown by Unit Table A12.A.2 Container Storage Areas Closure Cost Estimate Table A12.A.3 Tank Systems Closure Cost Estimate
- A12.B POSTCLOSURE COST ESTIMATE A12.B.1 Postclosure Care Cost Estimate Breakdown Table A12.B.1 Annual Postclosure Care Cost Estimate

# A12.A CLOSURE COST ESTIMATE

[R 299.9702(1) and 40 CFR §264.142]

The closure cost estimate covers the corresponding closure activities in the approved closure plan. These activities may include, but are not limited to, removal of waste inventory, decontamination, sampling and analysis, and closure certification. Unless otherwise specified in Section A11.A.3 of Template A11, the date of closure of the hazardous waste management units has not been determined. As such, it is not possible to predict, with any high degree of certainty, actual facility conditions or regulatory requirements at time of closure. Therefore, this closure cost estimate is based on closure of the unit within the next six months and includes a contingency estimate to account for media sampling and analysis, and removal based on current conditions.

The estimate assumes closure procedures are completed by a third party at the time facility closure would be most expensive (e.g., with a maximum inventory). The cost estimate for disposal assumes wastes will be treated and contaminated equipment disposed rather than recovered or salvaged. The total closure cost for the closure of the Petro-Chem is estimated at **\$2,649,786.00**. The closure cost estimate breakdown by unit is provided in Section A12.A.1. Unit-specific work sheets are provided, as applicable, in Tables A12.A.2 and A12.A.3.

Additional cost estimate assumptions are listed below.

1. All hazardous waste will be transported off site to a licensed facility in accordance with all applicable state and federal regulations.

- 2. Costs are based on current year costs. All labor rates reflect commercial rates and include fringe benefits, payroll burden, and taxes.
- 3. Total costs include a contingency for administrative and for miscellaneous operating costs.

This closure cost estimate will be maintained at the facility. It will be revised whenever a change in the closure plan affects the cost of closure. It will be adjusted annually as required by pertinent regulations or when the types and quantity of wastes received at the facility change.

# A12.A.1 Closure Cost Estimate Breakdown

Provide a breakdown of the closure cost estimate for the facility by completing the following tables, as appropriate.

## Table A12.A.1 Facility Closure Cost Estimate Breakdown by Unit\*

1.	Container Storage Areas	\$ 1,501,037.32			
2.	\$ 1,148,748.68				
	2. Tank Systems     Total Facility Closure and Postclosure Care Estimate     (add lines 1 through 2)				

\* Tables not included at this time for Land Treatment Units, Drip Pads, and Hazardous Waste Munitions and Explosives Storage Units

# Table A12.A.2 Container Storage Areas Closure Cost Estimate

If cer	Activity If certain activities are not expected to be performed, enter "NA" as the Estimated Cost.				
1.	Demolition and Removal of Containment	\$ 5,057.33			
2.	Removal of Soil	\$ 380,141.78			
3.	Backfill	\$ 35,209.69			
4.	Decontamination	\$ 42,846.80			
5.	Sampling and Analysis	\$ 56,447.02			
6.	Monitoring Well Installation	\$ N/A			
7.	Transportation	\$ Incl. in #8			
8.	Treatment and Disposal of Waste Inventory and Other Cleanup Wastes	\$ 579,265.04			
9.	Subtotal of Closure Costs (Add lines 1 through 8)	\$ 1,098,967.66			
10.	Engineering Expenses (typically 10% of closure costs, excluding certification of closure.)	\$ 109,896.77			
11.	Certification of Closure	\$ 42,000.00			
12.	Subtotal (Add Lines 9, 10, and 11])	\$ 1,250,864.43			
13.	Contingency Allowance (typically 20% of closure costs, engineering expenses, and cost of certification of closure.)	\$ 250,172.89			
14.	Landfill Closure	\$ N/A			
	Total Closure Cost (Add Lines 12, 13, and 14)	\$ 1,501,037.32			

Petro-Chem

# Table A12.A.3 Tank Systems Closure Cost Estimate

Petro-Chem

If cer	Activity If certain activities are not expected to be performed, enter "NA" as the Estimated Cost.					
1.	Removal of Waste	\$ Incl. in 4				
2.	Tank System Purging (ignitable wastes only)	\$ Incl. in 4				
3.	Flushing of Tank and Piping	\$ Incl. in 4				
4.	Excavation, Disassembly, and Loading	\$ 492,646.25				
5.	Demolition and Removal of Containment System	\$ 8,552.70				
6.	Removal of Soil	\$ 23,660.91				
7.	Backfill	\$ 28,167.75				
8.	Decontamination	\$ 100,158.54				
9.	Sampling and Analysis	\$ 45,157.61				
10.	Monitoring Well Installation	\$ N/A				
11.	Transportation	\$ Incl.				
12.	Treatment and Disposal of Waste Inventory and Cleanup Wastes	\$ 133,738.58				
13.	Subtotal of Closure Costs (Add Lines 1 through 12)	\$ 832,082.34				
14.	Engineering Expenses (typically 10% of closure costs, excluding certification of closure.)	\$ 83,208.23				
15.	Certification of Closure	\$ 42,000.00				
16.	Subtotal (Add Lines 13, 14, and 15)	\$ 957,290.57				
17.	Contingency Allowance (typically 20% of closure costs, engineering expenses, and cost of certification of closure.)	\$ 191,458.11				
18.	Landfill Closure	\$ N/A				
	Total Cost of Closure (Add lines 16, 17, and 18)	\$ 1,148,748.68				

# A12.B POSTCLOSURE COST ESTIMATE

[R 299.9702(1) and 40 CFR §264.144]

Postclosure care is not applicable to the Petro-Chem facility since no units with waste will be left in place.

Appendix I

**Container Waste Codes** 

D001	F012	K046	K151	P050	P119	U033	U091	U148	U206	001K
D002	F019	K048	K156	P051	P120	U034	U092	U149	U207	002K
D003	F024	K049	K157	P054	P121	U035	U093	U150	U208	
D004	F025	K050	K158	P056	P122	U036	U094	U151	U209	001U
D005	F032	K051	K159	P057	P123	U037	U095	U152	U210	033U
D006	F034	K052	K161	P058	P127	U038	U096	U153	U211	070U
D007	F035	K060	K169	P059	P128	U039	U097	U154	U213	074U
D008	F037	K061	K170	P060	P185	U041	U098	U155	U214	124U
D009	F038	K062	K171	P062	P188	U042	U099	U156	U215	131U
D010	F039	K069	K172	P063	P189	U043	U101	U157	U216	139U
D011		K071	K176	P064	P190	U044	U102	U158	U217	150U
D012	K001	K073	P001	P065	P191	U045	U103	U159	U218	
D013	K002	K083	P002	P066	P192	U046	U105	U160	U219	
D014	K003	K084	P003	P067	P194	U047	U106	U161	U220	
D015	K004	K085	P004	P068	P196	U048	U107	U162	U221	
D016	K005	K086	P005	P069	P197	U049	U108	U163	U222	
D017	K006	K087	P006	P070	P198	U050	U109	U164	U223	
D018	K007	K088	P007	P071	P199	U051	U110	U165	U225	
D019	K008	K093	P008	P072	P201	U052	U111	U166	U226	
D020	K009	K094	P009	P073	P202	U053	U112	U167	U227	
D021	K010	K095	P010	P074	P203	U055	U113	U168	U228	
D022	K011	K096	P011	P075	P204	U056	U114	U169	U234	
D023	K013	K097	P012	P076	P205	U057	U115	U170	U235	
D024	K014	K098	P013	P077	11004	U058	U116	U171	U236	
D025	K015	K099	P014	P078	U001	U059	U117	U172	U237	
D026	K016	K100	P015	P081	U002	U060	U118	U173	U238	
D027	K017	K101	P016	P082	U003	U061	U119	U174	U239	
D028	K018	K102	P017	P084	U004	U062	U120	U176	U240	
D029	K019 K020	K103 K104	P018 P020	P085 P087	U005 U006	U063 U064	U121 U122	U177 U178	U243	
D030 D031	K020 K021	K104 K105	P020 P021	P087	U008 U007	U064 U066	U122 U123	U178 U179	U244 U246	
D031 D032	K021 K022	K105 K106	P021 P022	P088	U007 U008	U068 U067	U123 U124	U180	U240 U247	
D032 D033	K022 K023	K100 K111	P022 P023	P089 P092	U008 U009	U068	U124 U125	U180	U247 U248	
D033 D034	K023 K024	K112	P023	P092 P093	U010	U069	U125	U182	U240 U249	
D034 D035	K024 K025	K112 K113	P024	P093 P094	U010	U070	U120 U127	U183	U271	
D036	K026	K113	P027	P095	U012	U071	U128	U184	U277	
D037	K020	K115	P028	P097	U012	U072	U129	U185	U278	
D038	K028	K116	P029	P098	U015	U073	U130	U186	U279	
D039	K029	K117	P030	P099	U016	U074	U131	U187	U280	
D040	K030	K118	P033	P101	U017	U075	U132	U188	U328	
D041	K031	K123	P034	P102	U018	U076	U133	U189	U353	
D042	K032	K124	P036	P103	U019	U077	U134	U190	U359	
D043	K033	K125	P037	P104	U020	U078	U135	U191	U364	
	K034	K126	P038	P105	U021	U079	U136	U192	U367	
F001	K035	K132	P039	P106	U022	U080	U137	U193	U372	
F002	K036	K136	P040	P108	U023	U081	U138	U194	U373	
F003	K037	K141	P041	P109	U024	U082	U140	U196	U387	
F004	K038	K142	P042	P110	U025	U083	U141	U197	U389	
F005	K039	K143	P043	P111	U026	U084	U142	U200	U394	
F006	K040	K144	P044	P112	U027	U085	U143	U201	U395	
F007	K041	K145	P045	P113	U028	U086	U144	U202	U404	
F008	K042	K147	P046	P114	U029	U087	U145	U203	U409	
F009	K043	K148	P047	P115	U030	U088	U146	U204	U410	
F010	K044	K149	P048	P116	U031	U089	U147	U205	U411	
F011	K045	K150	P049	P118	U032	U090				

Appendix II

Tank System Waste Codes

D001 D002 D004 D005 D006 D007 D008 D009 D010 D011 D012 D021 D022 D023 D024 D025 D026 D027 D028 D026 D027 D028 D029 D035 D036 D037 D038 D039 D038 D039 D040 D041 D042 D043	U001 U002 U031 U056 U125 U154 U140 U009 U220 U239	
F001 F002 F003 F004 F005		

# Appendix 2 - US EPA Waste Codes - Tank System Waste Codes

# Appendix III

Financial Assistance



## HAZARDOUS WASTE MANAGEMENT FACILITY AMENDATORY ENDORSEMENT POLLUTION LEGAL LIABILITY - SUDDEN AND ACCIDENTAL

This endorsement ("Endorsement") changes the Pollution Legal Liability Policy ("Policy") effective on the inception date of the Policy. This Endorsement is attached to the Policy to fulfill the insurance requirements of Section 11123 of the State of Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and R 299.9710 of the Michigan Administrative Code (MAC).

INSURER: Allied World Assurance Company (U.S.) Inc. INSURER'S ADDRESS: 199 Water Street, 24 <sup>th</sup> Floor			INSURED: PSC Environmental Services, LLC/Nortru, LLC INSURED'S ADDRESS: 350 Poplar Church Road			
CITY: New York	STATE: NY	ZIP CODE: 11038	CITY: Camp Hill	STATE: PA	ZIP CODE: 17011	
POLICY NUMBER: POLICY PERIOD: 0311-0601 FROM: December 1,				TO: December 1, 2022		
COVERED FACILITY: (Att	ach additional page if	necessary to list mu	Itiple Facilities covered)			
FACILITY NAME: Petro-Chem Processing Group of Nortru, LLC			FACILITY ADDRESS: 421 Lycaste			1
CITY: Detroit	STATE: MI	ZIP CODE: 48214-3434	EPA ID NUMBER: MID 980 615 298			

#### DEFINITIONS

As used in this Endorsement:

The term "Contaminant" means any hazardous waste defined in MAC R 299.9203, and any hazardous waste or hazardous constituent listed in Appendix VIII of Part 261 or Appendix IX of Part 264 of Title 40 of the Code of Federal Regulations; and

The term "Sudden and Accidental Occurrence" means the unintentional and unexpected discharge, dispersal, release, or escape of a contaminant in a noncontinuous and nonrepetitive manner, into or upon the land, the atmosphere, or any watercourse or body of water, which results in bodily injury or property damage.

#### DECLARATIONS

The insurance afforded with respect to Sudden and Accidental Occurrences is subject to all of the terms and conditions of the Policy provided however that any provisions of the Policy inconsistent with Sections A through F of this Endorsement are hereby amended to conform to Sections A through F.

- A. The limits of liability as respects bodily injury and property damage are provided in an amount not less than \$1,000,000 per occurrence with an annual aggregate of not less than \$2,000,000 exclusive of legal defense costs.
- The Insurer is liable for the payment of amounts within any deductible applicable to the Policy, with a right of reimbursement by the Insured for any such B. payment made by the insurer.
- C. A Notice of Violation or Order issued by the Michigan Department of Environment, Great Lakes, and Energy or other environmental agency shall not be deemed in and of itself sufficient evidence of an insured's intentional, knowing, willful, or deliberate noncompliance with a legal requirement so as to preclude coverage under this Policy.
- The Insurer will provide the Materials Management Division at the address below with at least 30 days advance written notice of cancellation, termination, or D. material change to the Policy which affects the coverage required by MAC R 299.9710. Such notices shall be provided no matter which party initiates the cancellation, termination, or material change, and whether or not nonpayment of premium is involved.
- F The following are the only specific pre-existing soil and groundwater conditions (defined in the referenced assessments or reports) that are excluded from coverage under the Policy (Attach additional pages if necessary): All pre-existing pollution conditions are excluded. Only new pollution conditions (Coverage 2) is provided under this policy.
- No condition, provision, stipulation, limitation, or exclusion contained in the Policy, or any other endorsement thereon, or any violation thereof, shall relieve the F. insurer from liability or from the payment of any claim, within the stated limits of liability in this Endorsement, for bodily injury and property damage to a third party caused by a sudden and accidental occurrence.

The Insurer hereby certifies that it has issued the Insured the Policy to provide financial assurance and responsibility for bodily injury and property damage caused by Sudden and Accidental Occurrences arising from operation of the covered facility(les), and that the Insurer is licensed to transact the business of insurance, or is eligible to provide insurance as an excess or surplus lines insurer, in the State of Michigan.

Filing of this Endorsement is required by Law (MAC R299.9710)

Submit one original signed Endorsement to:

HAZARDOUS WASTE SECTION MATERIALS MANAGEMENT DIVISION MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY PO BOX 30241 LANSING MI 48909-7741

Date 12/01/2021

Michigan Department of Environment, Great Lakes, and Energy Materials Management Division

# MICHIGAN WAIVER OF INSURED'S RIGHT TO IMMEDIATE CANCELLATION OF THIS POLICY

In order to comply with Administrative Rule R 299.9710 of the Michigan Administrative Code, it is hereby agreed that the Insured waives the right to immediate cancellation as provided under Section 500.3020 of the Michigan Insurance Code, P.A. 1956, No. 218.

Policy Number: 0311-0601

Insured: Harsco Corporation

By: Allied World Assurance Company (U.S.) Inc.

Name and Title: Mular 43

Melanie Frohriep, Facility Manager

Filing of this Waiver is required by Law (MAC R299.9710)

Submit one original signed Waiver to:

HAZARDOUS WASTE SECTION MATERIALS MANAGEMENT DIVISION MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY PO BOX 30241 LANSING MI 48909-7741



## HAZARDOUS WASTE MANAGEMENT FACILITY AMENDATORY ENDORSEMENT POLLUTION LEGAL LIABILITY - SUDDEN AND ACCIDENTAL

This endorsement ("Endorsement") changes the Pollution Legal Liability Policy ("Policy") effective on the inception date of the Policy. This Endorsement is attached to the Policy to fulfill the insurance requirements of Section 11123 of the State of Michigan Natural Resources and Environmental Protection Act. 1994 PA 451, as amended, and R 299.9710 of the Michigan Administrative Code (MAC).

INSURER:			INSURED:		
Allied World Assurance Company (U.S.) Inc.			Harsco Corporation		
INSURER'S ADDRESS:			INSURED'S ADDRESS:		
199 Water Street, 24th Floor			350 Poplar Church Road		
CITY:	STATE:	ZIP CODE:	CITY:	I STATE: ZIP COD	
New York	NY	11038	Camp Hill	PA 17011	
0311-0601 FROM: Decemb		POLICY PERIOD: FROM: December 1,		TO: December 1, 2022	· · · · · · · · · · · · · · · · · · ·
COVERED FACILITY: (/	Attach additional page if	necessary to list mu	Itiple Facilities covered)	and the second	
FACILITY NAME:			FACILITY ADDRESS:		
Nortru, LLC – Transfer Facility			550 Lycaste		
CITY: Detroit	STATE: MI	ZIP CODE: 48214-3434	EPA ID NUMBER: MIR 000 005 892		

As used in this Endorsement:

#### DEFINITIONS

The term "Contaminant" means any hazardous waste defined in MAC R 299.9203, and any hazardous waste or hazardous constituent listed in Appendix VIII of Part 261 or Appendix IX of Part 264 of Title 40 of the Code of Federal Regulations; and

The term "Sudden and Accidental Occurrence" means the unintentional and unexpected discharge, dispersal, release, or escape of a contaminant in a noncontinuous and nonrepetitive manner, into or upon the land, the atmosphere, or any watercourse or body of water, which results in bodily injury or property damage.

#### DECLARATIONS

The insurance afforded with respect to Sudden and Accidental Occurrences is subject to all of the terms and conditions of the Policy provided however that any provisions of the Policy inconsistent with Sections A through F of this Endorsement are hereby amended to conform to Sections A through F.

- A The limits of liability as respects bodily injury and property damage are provided in an amount not less than \$1,000,000 per occurrence with an annual aggregate of not less than \$2,000,000 exclusive of legal defense costs.
- The Insurer is liable for the payment of amounts within any deductible applicable to the Policy, with a right of reimbursement by the Insured for any such B. payment made by the Insurer.
- A Notice of Violation or Order issued by the Michigan Department of Environment, Great Lakes, and Energy or other environmental agency shall not be C. deemed in and of itself sufficient evidence of an insured's intentional, knowing, willful, or deliberate noncompliance with a legal requirement so as to preclude coverage under this Policy.
- The Insurer will provide the Materials Management Division at the address below with at least 30 days advance written notice of cancellation, termination, or D. material change to the Policy which affects the coverage required by MAC R 299.9710. Such notices shall be provided no matter which party initiates the cancellation, termination, or material change, and whether or not nonpayment of premium is involved.
- E The following are the only specific pre-existing soil and groundwater conditions (defined in the referenced assessments or reports) that are excluded from coverage under the Policy (Attach additional pages if necessary): All pre-existing pollution conditions are excluded. Only new pollution conditions (Coverage 2) is provided under this policy.
- F. No condition, provision, stipulation, limitation, or exclusion contained in the Policy, or any other endorsement thereon, or any violation thereof, shall relieve the insurer from liability or from the payment of any claim, within the stated limits of liability in this Endorsement, for bodily injury and property damage to a third party caused by a sudden and accidental occurrence.

The Insurer hereby certifies that it has issued the Insured the Policy to provide financial assurance and responsibility for bodily injury and property damage caused by Sudden and Accidental Occurrences arising from operation of the covered facility(ies), and that the Insurer is licensed to transact the business of insurance, or is eligible to provide insurance as an excess or surplus lines insurer, in the State of Michigan.

Filing of this Endorsement is required by Law (MAC R299.9710)

Submit one original signed Endorsement to:

HAZARDOUS WASTE SECTION MATERIALS MANAGEMENT DIVISION MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY PO BOX 30241 LANSING MI 48909-7741

Molly Zeigler	
Street Address or PO Box 311 South Wacker Street	
City, State and Zip Code Chicago, IL 60606	
Signature of Authorized Agent	Date 12/01/2021

Name of Authorized Agent

Michigan Department of Environment, Great Lakes, and Energy Materials Management Division

# MICHIGAN WAIVER OF INSURED'S RIGHT TO IMMEDIATE CANCELLATION OF THIS POLICY

In order to comply with Administrative Rule R 299.9710 of the Michigan Administrative Code, it is hereby agreed that the Insured waives the right to immediate cancellation as provided under Section 500.3020 of the Michigan Insurance Code, P.A. 1956, No. 218.

Policy Number: 0311-0601

Insured: Nortru, LLC

By: Allied World Assurance Company (U.S.) Inc

Name and Title: Melance

Melanie Frohriep , Facility Manager

Filing of this Waiver is required by Law (MAC R299.9710)

Submit one original signed Waiver to:

HAZARDOUS WASTE SECTION MATERIALS MANAGEMENT DIVISION MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY PO BOX 30241 LANSING MI 48909-7741

# MICHIGAN WAIVER OF INSURED'S RIGHT TO IMMEDIATE CANCELLATION OF THIS POLICY

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Policy Number: 0311-0601

Insured: Nortru, LLC

By: Allied World Assurance Company (U.S.) Inc

Name and Title: \_\_\_\_\_

Melanie Frohriep, Facility Manager

#### Filing of this Waiver is required by Law (MAC R299.9710)

Submit one original signed Waiver to:

HAZARDOUS WASTE SECTION MATERIALS MANAGEMENT DIVISION MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY PO BOX 30241 LANSING MI 48909-7741

Section 8

**Corrective Action (B2)** 

## FORM EQP 5111 ATTACHMENT TEMPLATE B2 **CORRECTIVE ACTION INFORMATION**

The administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451) R 299.9504(1)(c), R 299.9508(1)(b), R 299.9525, R 299.9629, R 299.9635, and R 299.9636; §§324.11115a and 324.11115b of Act 451; and Title 40 of the Code of Federal Regulations (CFR) §270.14(d) and Part 264, Subpart F, establish requirements for submitting corrective action information and implementing a corrective action program for hazardous waste management facilities. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003.

This license application template addresses requirements for corrective action information for the waste management units (WMU) at the Petro-Chem facility located in Detroit, Michigan. This template includes facility background information, current conditions, and release assessment requirements for operating license applications. This template supplies information to support the corrective action program specified in R 299.9629. The facility is not proposing to eliminate any WMU from the corrective action program under Part 111 of Act 451.

Samples collected for waste characterization and environmental monitoring during corrective action will be collected, transported, analyzed, stored, and disposed by trained and qualified individuals in accordance with a QA/QC Plan. The QA/QC Plan includes or references the written procedures outlined in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication SW-846, Third Edition, Chapter 1 (November 1986), and its Updates.

Applicant for Operating License for Existing Facility:

 $\boxtimes$ R 299.9629 Corrective Action

Elimination from corrective action requirements proposed for one or more units

Applicant for Operating License for New, Altered, Enlarged, or Expanded Operating License:

R 299.9629 Corrective Action

Elimination from corrective action requirements proposed for one or more units

This template is organized as follows:

B2.A	FACILITY BACKGROUND			
	B2.A.1	History and	Description of Ownership and Operation	
	B2.A.2	Environmental Setting		
		B2.A.2(a)	Climate	
		B2.A.2(b)	Topography	
		B2.A.2(c)	Hydrogeology	
		B2.A.2(d)	Soil	
		B2.A.2(e)	Surface Water	
		B2.A.2(f)	Surrounding Land Uses	
			-	

- B2.A.2(g) Critical Habitats and Endangered Species
- B2.A.3 Characterization of Potential or Actual Sources of Contamination
  - B2.A.3(a) [Name of Unit or Unit Group]
    - B2.A.2(a)(1) Unit Characteristics
    - B2.A.2(a)(2) Waste Characteristics and Management
- B2.A.2(a)(3) History of Releases or Potential to Release

# B2.B FACILITY'S ASSESSMENT OF KNOWN NATURE AND EXTENT OF CONTAMINATION

- B2.B.1 Groundwater
  - B2.B.1(a) Characterization History
  - B2.B.1(b) Description of Horizontal and Vertical Extent of Plume(s)
  - B2.B.1(c) Horizontal and Vertical Direction of Contaminant Movement
  - B2.B.1(d) Velocity of Groundwater Contaminant Movement
  - B2.B.1(e) Factors Influencing Plume Movement
  - B2.B.1(f) Extrapolation of Future contaminant Movement
  - B2.B.1(g) Recommendations or Established Requirements for Additional Investigations
  - B2.B.2 Soil
    - B2.B.2(a) Characterization History
    - B2.B.2(b) Description of Horizontal and Vertical Extent of Contamination
    - B2.B.2(c) Description of Soil and Contaminant Properties
    - B2.B.2(d) Velocity and Direction of Contaminant Movement
    - B2.B.2(e) Extrapolation of Future Contaminant Movement
    - B2.B.2(f) Recommendations or Established Requirements for Additional Investigations
- B2.B.3 Surface Water and Sediment
  - B2.B.3(a) Characterization History
    - B2.B.3(b) Description of Horizontal and Vertical Extent of Any Contamination
    - B2.B.3(c) Velocity of Contaminant Movement
    - B2.B.3(d) Description of Sediment Characteristics
    - B2.B.3(e) Description of Physical, Biological, and Chemical Factors That May Influence Contaminant Movement and Their Effects
    - B2.B.3(f) Proposed or Final Mixing Zone Determinations for Any On-Site Contamination Venting to a Surface Water Body
    - B2.B.3(g) Recommendations or Established Requirements for Additional Investigations
- B2.B.4 Air
  - B2.B.4(a) Characterization History
  - B2.B.4(b) Description of Horizontal and Vertical Direction and Velocity of Contaminant Movement
  - B2.B.4(c) Rate and Amount of Release
  - B2.B.4(d) Recommendations or Established Requirements for Additional Investigations
- B2.B.5 Subsurface Gas Contamination
  - B2.B.5(a) Characterization History
  - B2.B.5(b) Description of Horizontal and Vertical Extent of Subsurface Gas Contamination Migration
  - B2.B.5(c) Rate, among, and Density of Gases Being Emitted

- B2.B.5(d) Recommendations or Established Requirements for Additional Investigations
- B2.C FACILITY'S EXPOSURE ASSESSMENT
  - B2.C.1 Human Exposure and Threats
    - B2.C.1(a) Exposure Pathway
    - B2.C.1(b) Actual or Potential Receptors
    - B2.C.1(c) Evidence of Exposure
    - B2.C.2 Environmental Exposure and Threats
      - B2.C.2(a) Exposure Pathway
        - B2.C.2(b) Actual or Potential Receptors
        - B2.C.2(c) Evidence of Exposure
- B2.D INTERIM MEASURES
  - B2.D.1 [MTBE RFI Work Plan]
    - B2.D.1(a) Objective of the Measure
    - B2.D.1(b) Design and Construction
    - B2.D.1(c) Operation, Monitoring, and Maintenance
    - B2.D.1(d) Evaluation of Measure Effectiveness
    - B2.D.1(e) Proposed or Required Schedules for Continued Operation or Future Changes in the Measure
- B2.E ENVIRONMENTAL INDICATORS
  - Attachment B2.E.1 Environmental Indicator Checklists
- B2.F FACILITY'S ASSESSMENT OF KNOWN OR PROPOSED CONSTITUENTS OF CONCERN
- B2.G ESTABLISHED OR PROPOSED CLEANUP CRITERIA
- B2.H ESTABLISHED OR PROPOSED COMPLIANCE POINTS AND PERIODS
- B2.I OFF-SITE ACCESS
- B2.J PUBLIC INVOLVEMENT PLAN
- B2.K HEALTH AND SAFETY PLAN
- B2.L NOTICE REQUIREMENTS
- B2.M JUSTIFICATION FOR PROPOSED ELIMINATION OF ANY WASTE MANAGEMENT UNIT FROM THE CORRECTIVE ACTION PROGRAM OR INTENT TO PROCEED WITH CORRECTIVE ACTIONS

## B2.A FACILITY BACKGROUND

## B2.A.1 History and Description of Ownership and Operation

Petro-Chem Processing Group of Nortru, LLC, is a full-service Hazardous Waste Treatment, Storage and Disposal facility is capable of handling a wide variety of waste streams (450 permitted waste codes) for fuel blending, transship and bulking. It is one of the largest facilities in the US processing waste-derived fuels from hazardous waste. Petro-Chem also offers lab packing and de-packing services as a cost-efficient solution for managing a variety of laboratory wastes including reactives, cylinders, flammables, corrosives and poisons. Petro-Chem is a permitted Treatment, Storage, and Disposal Facility specializing in the production of supplemental fuel for energy recovery in industrial furnaces. The benefits are numerous: certain regulated boilers and industrial furnaces enjoy a large source of fuel, the use and depletion of nonrenewable fossil fuels are reduced, and the environment is protected from land disposal of potentially dangerous industrial wastes. Amoco Oil Company developed the original property in 1923 as a small bulk fuel oil terminal. Amoco operated this site until the mid-70's, when KOI Petroleum took it over and operated it until 1976. Petro-Chem purchased the initial property out of bankruptcy court in 1981 and has continuously acquired additional parcels since that time. Petro-Chem began operations in 1982. Nortru, Inc. was established in 1979. Petro-Chem Processing Group was established in 1981. Nortru, LLC was established in 2008.

Information required by this template has been provided in the revised 1996 Hydrogeological Report submitted in support of Petro-Chem original RCRA Part B Permit Application dated September 24, 1996. The most current ground water monitoring information was provided to EGLE in the 2021 Petro-Chem Processing Group of Nortru, LLC annual groundwater report. This report was provided to EGLE on February 28, 2022. A copy of this 463-page annual groundwater report and previous annual ground water monitoring reports will be provided upon request. Additional information has also been provided in the Environmental Assessment located in Volume IV, Section 1 of this permit renewal application.

Petro-Chem currently does not have any waste management units requiring corrective action at the time of this permit renewal application. There is one ongoing corrective action to address preexisting MTBE groundwater impacts at the facility.

## Enforcement History:

The facility has had one open Finding of Violation (FOV) issued by U.S. EPA on June 18, 2018 which Petro-Chem has refuted and is awaiting a response from EPA. The FOV was regarding compliance with NESHAP standards for offsite waste and recovery operations and benzene waste operations that were part of the facility's previous Renewable Operating Permit no. MI-ROP-N0731-2009. The most recent DEQ inspection report which includes a compliance history summary has been provided in Volume IV, Section 1, Appendix B4.3 "2020 DEQ Activity Report".

## Other Permits:

A list of other environmental permits and licenses associated with the Petro-Chem facility is provided in the Part A permit application and copies of the permits have been provided in Volume IV, Section 1, Appendix B4.3 of this application.

## Previous Investigations and Corrective Actions:

The following is a summary of RCRA Facility Investigations

## 1. Original Container Building

Tetra Tech performed a subsurface investigation in 2008 in response to the removal of the original container management building. A copy of the 2008 486-page 2008 Tetra Tech report will be provided electronically upon request. The impacted soils identified in this report were removed/remediated before the current or existing container management building was constructed.

## 2. 2007 Part 201 Pathway Analysis:

A Part 201 Pathway Analysis was requested by Michigan Department of Environmental Quality (MDEQ) following the August 2006 Fire Event to determine any off-site impacts if any occurred. Petro-Chem retained Bureau Veritas to evaluate relevant exposure pathways

(under Part 201 of Act 451) following the potential release of hazardous substances that occurred as a result of a fire at the subject property in 2006. The results of this evaluation were submitted to MDEQ in a report dated August 27, 2007. On May 21, 2008, MDEQ requested additional information to support the conclusions of the initial evaluation. In July 2008, Petro-Chem submitted a proposal that drinking water was not a relevant pathway which was denied by MDEQ in a letter dated November 28, 2008. On August 11, 2008 the facility provided a final 201 exposure pathways report to DEQ that concluded the corrective actions associated with the 2006 fire were not warranted. In a letter dated November 25, 2008, the DEQ determined the drinking water pathway and groundwater monitoring was still relevant. A copy of the report has been submitted to EGLE on November 17, 2016. A copy of this plan is available electronically and will also be provided upon request.

## 3. <u>2016 Corrective Measures MTBE Release, Interim Measures, Multi Phase</u> <u>Extraction (MPE):</u>

This workplan was prepared in response to the letter received from Mr. David Slayton, Geologist with the Michigan Department of Environmental Quality, dated October 16, 2009. The letter indicated that a RFI Workplan would need to be prepared in order to address the discovery of MTBE in groundwater samples collected during the first semi-annual sampling event conducted in July 2009. A copy of the 2009 annual groundwater monitoring report was provided to EGLE on March 26, 2010. A copy of this report will be provided upon request. The MTBE discovery was considered a new release under License Condition VI.D.1. As a result, Petro-Chem prepared RCRA Facility Investigation Work Plan which was submitted to EGLE January of 2010. A copy of this 357-page will be provided upon request. The RFI plan was initiated in November 2010 where soil borings were collected and analyzed. Based on the RFI results, the facility prepared and implemented an interim and corrective measures plans which included the removal of soils from the southwest corner of the property. As part of the RFI and corrective measures, the facility has also submitted the following reports to EGLE which contain information on soil borings, sampling and testing. Copies of these reports and studies are available electronically and will be provided upon request:

- RFI Report, Philip Environmental Services Division, Petro-Chem Processing Group Facility, 421 Lycaste Street, Detroit, Michigan, dated February 16, 2011
- Amended Corrective Action Investigation Report, Petro-Chem Processing Group of Nortru, LLC, 421 Lycaste Street, Detroit, Michigan, dated November 20, 2015
- Corrective Measures Study Investigation Report, Stericycle Environmental Solutions, Inc., Petro-Chem Processing Group Facility, 421 Lycaste Street, Detroit, Michigan, dated May 13, 2016
- Corrective Measures Study, Stericycle Environmental Solutions, Inc., Petro-Chem Processing Group Facility, 421 Lycaste Street, Detroit 48214, Michigan, dated November 17, 2016

The facility has completed the removal of the west berm soil stockpile (the interim and corrective measure) from the southwest corner of the property and has completed the multi-phase extraction (MPE) pilot test. The final west berm soil removal report and final MPE test report is attached to this form as Appendix 1 and Appendix 2 to Form B2 in Volume I, Section 8. Acceptance of the final interim measures and reinstatement of the SBS building is pending a letter of acceptance from EGLE.

## 4. <u>2020 PFOS/A Groundwater Sampling:</u>

In a letter dated February 6, 2020, EGLE requested that Petro-Chem prepare and submit a corrective action investigation work plan to address PFAS identified in the January 22, 2020 PFAS Groundwater Sampling Report. Petro-Chem provided the Corrective Action Investigation Work Plan to EGLE on May 29, 2020. A subsequent PFAS Groundwater Sampling Report was provided to EGLE on December 8, 2020. The report summary indicated, "As presented in the Corrective Action Investigation Work Plan for PFAS, dated May 29, 2020, it is Apex's opinion that drinking water and groundwater surface water interface are not applicable pathways due to the following: (1) offsite sewers are not intercepting groundwater, (2) onsite sewers are set above the water bearing zone, (3) the presence of a peat layer which retards the potential for offsite migration, and (4) the absence of private drinking water wells within at least 3 miles of the Site. Therefore, further action in regard to PFAS is not warranted at this time."

# B2.A.2 Environmental Setting

Section B2.A.2 has been addressed in Volume IV, Section 1, Form B4 Environmental Assessment, Section B4.A.2.

# B2.A.2(a) Climate

Section B2.A.2(a) has been addressed in Volume IV, Section 1, Form B4 Environmental Assessment, Section B4.A.2(a).

## B2.A.2(b) Topography

Section B2.A.2(b) has been addressed in Volume IV, Section 1, Form B4 Environmental Assessment, Section B4.A.2(b)

## B2.A.2(c) Hydrogeology

Section B2.A.2(c) has been addressed in Volume IV, Section 1, Form B4 Environmental Assessment, Section B4.A.2(c).

## B2.A.2(d) Soil

Section B2.A.2(g) has been addressed in Volume IV, Section 1, Form B4 Environmental Assessment, B4.A.2(d).

## B2.A.2(e) Surface Water

Section B2.A.2(g) has been addressed in Volume IV, Section 1, Form B4 Environmental Assessment, Section B4.A.2.(e).

# B2.A.2(f) Surrounding Land Uses

Section B2.A.2(f) has been addressed in Volume IV, Section 1, Form B4 Environmental Assessment, Sections B4.A.2(f) and B4.A.2(h)

## B2.A.2(g) Critical Habitats and Endangered Species

Section B2.A.2(g) has been addressed in Volume IV, Section 1, Form B4 Environmental Assessment, Section B4.A.2(g).

## **B2.A.3** Characterization of Potential or Actual Sources of Contamination [R 299.9504(c) and 40 CFR §270.14(d)]

The Petro-Chem facility has not identified any waste management units (WMU) sources which could be considered an area of concern or other sources which may present an unacceptable risk to public health, safety, welfare, or the environment at the time this permit renewal application was prepared. Therefore, the remainder of this section is not applicable.

A summary of the previous investigations of potential and actual sources of contamination has been provided in Section B2.A.1 of this form.

## B2.A.3(a) Identified Units

The Petro-Chem facility has not identified any WMU sources which could be considered an area of concern or other sources which may present an unacceptable risk to public health, safety, welfare, or the environment at the time this permit renewal application was prepared. Therefore, this section is not applicable.

## B2.A.3(a)(1) Unit Characteristics

The Petro-Chem facility has not identified any WMU sources which could be considered an area of concern or other sources which may present an unacceptable risk to public health, safety, welfare, or the environment at the time this permit renewal application was prepared. Therefore, this section is not applicable.

## B2.A.3(a)(2) Waste Characteristics and Management

The Petro-Chem facility has not identified any WMU sources which could be considered an area of concern or other sources which may present an unacceptable risk to public health, safety, welfare, or the environment at the time this permit renewal application was prepared. Therefore, this section is not applicable.

## B2.A.3(a)(3) History of Releases or Potential to Release

The Petro-Chem facility has not identified any WMU sources which could be considered an area of concern or other sources which may present an unacceptable risk to public health, safety, welfare, or the environment at the time this permit renewal application was prepared. Therefore, this section is not applicable.

# B2.B FACILITY'S ASSESSMENT OF KNOWN NATURE AND EXTENT OF CONTAMINATION

## B2.B.1 Groundwater

## B2.B.1(a) Characterization History

A description the facility's known nature and extent of contamination, remedial investigation reports and assessments, is discussed above in section B2.A.1 of this document. Additional information is provided in:

- The Revised 1996 Hydrogeologic Report and Monitoring Plan.
- Permit Application Volume III, Form B3 Hydrogeologic Report.
- Corrective Measures Study, Stericycle Environmental Solutions, Inc., Petro-Chem Processing Group Facility, 421 Lycaste Street, Detroit 48214, Michigan, dated November 17, 2016
- The 2021 Annual Groundwater Report Petro-Chem Processing Group of Nortru, LLC. This report was submitted to EGLE on February 28, 2022 and is not included in this application. Petro-Chem will provide another copy of the 463-page 2021 annual groundwater monitoring report upon request.

Copies of these reports have been submitted to EGLE. Petro-Chem will provide electronic copies of these reports upon request.

## B2.B.1(b) Description of Horizontal and Vertical Extent of Plume(s)

Section B2.B1(b) has been addressed in Petro-Chem's ongoing hydrogeological study/monitoring program. This information is also discussed in EGLE Form B3, "Hydrogeological Report" provided in Volume III of this plan. Additional information is provided in:

- The Revised 1996 Hydrogeologic Report and Monitoring Plan.
- Permit Application Volume IV, Section 1, Form B4 Environmental Assessment Report.
- Permit Application Volume IV, Section 2, Form B5 Environmental Monitoring Report.
- The 2007 Part 201 Exposure Pathway Analysis, Prepared by Bureau Veritas North America, Inc. for Petro-Chem.
- The 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem.
- The 2021 Annual Groundwater Report Petro-Chem Processing Group of Nortru, LLC. This report was submitted to EGLE on February 28, 2022 and is not included in this application. Petro-Chem will provide another copy of the 463-page 2021 annual groundwater monitoring report upon request.

Copies of these reports have been submitted to EGLE. Petro-Chem will provide electronic copies of these reports upon request.

# B2.B.1(c) Horizontal and Vertical Direction of Contaminant Movement

Section B2.B1(c) has been addressed in Petro-Chem's ongoing hydrogeological study/monitoring program. This information is also discussed in EGLE Form B3, "Hydrogeological Report" provided in Volume III of this plan. Additional information is provided in:

- The Revised 1996 Hydrogeologic Report and Monitoring Plan.
- Permit Application Volume IV, Section 1, Form B4 Environmental Assessment Report.
- Permit Application Volume IV, Section 2, Form B5 Environmental Monitoring Report.
- The 2007 Part 201 Exposure Pathway Analysis, Prepared by Bureau Veritas North America, Inc. for Petro-Chem.
- The 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem.
- The 2021 Annual Groundwater Report Petro-Chem Processing Group of Nortru, LLC. This
  report was submitted to EGLE on February 28, 2022 and is not included in this application.
  Petro-Chem will provide another copy of the 463-page 2021 annual groundwater
  monitoring report upon request.
- The final west berm soil removal report and the final MPE pilot test report has been attached to this form as Volume I, Section 8, Appendix 1 and 2.

Copies of these reports have been submitted to EGLE. Petro-Chem will provide electronic copies of these reports upon request.

## B2.B.1(d) Velocity of Groundwater Contaminant Movement

Section B2.B1(d) has been addressed in Petro-Chem's ongoing hydrogeological study/monitoring program. This information is also discussed in EGLE Form B3, "Hydrogeological Report" provided in Volume III of this plan. Additional information is provided in:

- The Revised 1996 Hydrogeologic Report and Monitoring Plan.
- Permit Application Volume IV, Section 1, Form B4 Environmental Assessment Report.
- Permit Application Volume IV, Section 2, Form B5 Environmental Monitoring Report.
- The 2007 Part 201 Exposure Pathway Analysis, Prepared by Bureau Veritas North America, Inc. for Petro-Chem.
- The 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem.
- The 2021 Annual Groundwater Report Petro-Chem Processing Group of Nortru, LLC. This
  report was submitted to EGLE on February 28, 2022 and is not included in this application.
  Petro-Chem will provide another copy of the 463-page 2021 annual groundwater
  monitoring report upon request.

Copies of these reports have been submitted to EGLE. Petro-Chem will provide electronic copies of these reports upon request.

# B2.B.1(e) Factors Influencing Plume Movement

Section B2.B1(e) has been addressed in Petro-Chem's ongoing hydrogeological study/monitoring program. This information is also discussed in EGLE Form B3, "Hydrogeological Report" provided in Volume III of this plan. Additional information is provided in:

- The Revised 1996 Hydrogeologic Report and Monitoring Plan.
- Permit Application Volume IV, Section 1, Form B4 Environmental Assessment Report.
- Permit Application Volume IV, Section 2, Form B5 Environmental Monitoring Report.
- The 2007 Part 201 Exposure Pathway Analysis, Prepared by Bureau Veritas North America, Inc. for Petro-Chem.
- The 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem.
- The 2021 Annual Groundwater Report Petro-Chem Processing Group of Nortru, LLC. This
  report was submitted to EGLE on February 28, 2022 and is not included in this application.
  Petro-Chem will provide another copy of the 463-page 2021 annual groundwater
  monitoring report upon request.

Copies of these reports have been submitted to EGLE. Petro-Chem will provide electronic copies of these reports upon request.

# B2.B.1(f) Extrapolation of Future Contaminant Movement

Section B2.B1(f) has been addressed in Petro-Chem's ongoing hydrogeological study/monitoring program. This information is also discussed in EGLE Form B3, "Hydrogeological Report" provided in Volume III of this plan. Additional information is provided in:

- The Revised 1996 Hydrogeologic Report and Monitoring Plan.
- Permit Application Volume IV, Section 1, Form B4 Environmental Assessment Report.
- Permit Application Volume IV, Section 2, Form B5 Environmental Monitoring Report.
- The 2007 Part 201 Exposure Pathway Analysis, Prepared by Bureau Veritas North America, Inc. for Petro-Chem.
- The 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem.
- The 2021 Annual Groundwater Report Petro-Chem Processing Group of Nortru, LLC. This
  report was submitted to EGLE on February 28, 2022 and is not included in this application.
  Petro-Chem will provide another copy of the 463-page 2021 annual groundwater
  monitoring report upon request.

Copies of these reports have been submitted to EGLE. Petro-Chem will provide electronic copies of these reports upon request.

## B2.B.1(g) Recommendations or Established Requirements for Additional Investigations

The facility has not identified any recommendations or established requirements for additional groundwater contamination investigation beyond the current ongoing groundwater studies or monitoring.

# B2.B.2 Soil

Petro-Chem was not and is not currently required to conduct a soil study. The facility does not have any reason to suspect soil has been impacted. Therefore, this section is not applicable.

## B2.B.2(a) Characterization History

Petro-Chem was not and is not currently required to conduct a soil study. The facility does not have any reason to suspect soil has been impacted. Therefore, this section is not applicable.

## B2.B.2(b) Description of Horizontal and Vertical Extent of Contamination

Petro-Chem was not and is not currently required to conduct a soil study. The facility does not have any reason to suspect soil has been impacted. Therefore, this section is not applicable.

## B2.B.2(c) Description of Soil and Contaminant Properties

Petro-Chem was not and is not currently required to conduct a soil study. The facility does not have any reason to suspect soil has been impacted. Therefore, this section is not applicable.

## B2.B.2(d) Velocity and Direction of Contaminant Movement

Petro-Chem was not and is not currently required to conduct a soil study. The facility does not have any reason to suspect soil has been impacted. Therefore, this section is not applicable.

## B2.B.2(e) Extrapolation of Future Contaminant Movement

Petro-Chem was not and is not currently required to conduct a soil study. The facility does not have any reason to suspect soil has been impacted. Therefore, this section is not applicable.

## B2.B.2(f) Recommendations or Established Requirements for Additional Investigations

The facility has not identified any recommendations or established requirements for additional soil contamination investigation beyond the current ongoing groundwater studies or monitoring.

## B2.B.3 Surface Water and Sediment

## B2.B.3(a) Characterization History

The facility has not had a reason to perform surface water or sediment sampling. There have been no significant surface water or sediment sampling events. Therefore, this section is not applicable.

## B2.B.3(b) Description of Horizontal and Vertical Extent of Any Contamination

The facility has not had a reason to perform surface water or sediment sampling. There have been no significant surface water or sediment sampling events. Therefore, this section is not applicable.

# B2.B.3(c) Velocity of Contaminant Movement

The facility has not had a reason to perform surface water or sediment sampling. There have been no significant surface water or sediment sampling events. Therefore, this section is not applicable.

## B2.B.3(d) Description of Sediment Characteristics

The facility has not had a reason to perform surface water or sediment sampling. There have been no significant surface water or sediment sampling events. Therefore, this section is not applicable.

## B2.B.3(e) Description of Physical, Biological, and Chemical Factors That May Influence Contaminant Movement and Their Effects

The facility has not had a reason to perform surface water or sediment sampling. There have been no significant surface water or sediment sampling events. Therefore, this section is not applicable.

## B2.B.3(f) Proposed or Final Mixing Zone Determinations for Any On-Site Contamination Venting to a Surface Water Body

The facility has not had a reason to perform surface water or sediment sampling. There have been no significant surface water or sediment sampling events. Therefore, this section is not applicable.

## B2.B.3(g) Recommendations or Established Requirements for Additional Investigations

The facility has not had a reason to perform surface water or sediment sampling. There have been no significant surface water or sediment sampling events. Therefore, this section is not applicable.

## B2.B.4 Air

Petro-Chem monitors ambient air in accordance with the Hazardous Waste Facility Operating License issued by the Michigan Department of Environmental Quality. Around the perimeter of the facility, there are four locations, with one station having duplicate samplers for QA/QC. Organic samplers are located at each of the four monitoring locations and collect an 8-hour composite sample over a 24-hour period (1 minute on, two minutes off) every six days. Samples are analyzed for: Benzene, Carbon Tetrachloride, Chloroform, Methylene Chloride, Tetrachloroethane, Trichloroethylene, Vinyl Chloride, 1,1,1-Trichlorethane, Toluene, and Xylene. The data collected is reported to the Michigan Department of Environmental Quality. The original monitoring plan indicated that once a record of compliance had been established, the facility would request a reduction in the sampling frequency or adjustment in the scope of the monitoring program. Based on analysis of the air monitoring results, the facility is requesting an adjustment of the monitoring

program. A description of the air monitoring plan, information and proposed changes has been provided in Volume IV, Section 2, EGLE Form B5 and Appendix B5.0 of this permit application. **B2.B.4(a)** Characterization History

A characterization history has been provided in the October 2011 Bureau Veritas ambient monitoring network plan provided in Volume IV, Section 2, Appendix 5.0.

# B2.B.4(b) Description of Horizontal and Vertical Direction and Velocity of Contaminant Movement

Information addressing the horizontal and vertical movement of contaminants has been provided in the October 2011 Bureau Veritas ambient monitoring network plan provided in Volume IV, Section 2, Appendix 5.0.

# B2.B.4(c) Rate and Amount of Release

Information addressing the horizontal and vertical movement of contaminants has been provided in the October 2011 Bureau Veritas ambient monitoring network plan provided in Volume IV, Section 2, Appendix 5.0.

# B2.B.4(d) Recommendations or Established Requirements for Additional Investigations

Information addressing the horizontal and vertical movement of contaminants has been provided in the October 2011 Bureau Veritas ambient monitoring network plan provided in Volume IV, Section 2, Appendix 5.0.

# B2.B.5 Subsurface Gas Contamination

# B2.B.5(a) Characterization History

The 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem included a discussion of subsurface gas contamination investigations and (multi-phase extraction or MPE) pilot test investigation. A copy of this report has been provided to EGLE on November 17, 2016. The final west berm soil removal report and the final MPE pilot test report has been attached to this form as Volume I, Section 8, Appendix 1 and 2. Additional information is provided:

- The Revised 1996 Hydrogeologic Report and Monitoring Plan.
- Permit Application Volume IV, Section 1, Form B4 Environmental Assessment Report.
- Permit Application Volume IV, Section 2, Form B5 Environmental Monitoring Report.
- The 2007 Part 201 Exposure Pathway Analysis, Prepared by Bureau Veritas North America, Inc. for Petro-Chem.
- The 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem.
- The 2021 Annual Groundwater Report Petro-Chem Processing Group of Nortru, LLC. This report was submitted to EGLE on February 28, 2022.

Copies of these reports have been submitted to EGLE. Petro-Chem will provide electronic copies of these reports upon request.

# B2.B.5(b) Description of Horizontal and Vertical Extent of Subsurface Gas Contamination Migration

The 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem included a discussion of subsurface gas contamination investigations and (multi-phase extraction or MPE) pilot test investigation. A copy of this report has been provided to EGLE on November 17, 2016. The final west berm soil removal report and the final MPE pilot test report has been attached to this form as Volume I, Section 8, Appendix 1 and 2. Additional information is provided:

- Permit Application Volume IV, Section 1, Form B4 Environmental Assessment Report.
- Permit Application Volume IV, Section 2, Form B5 Environmental Monitoring Report.
- The 2007 Part 201 Exposure Pathway Analysis, Prepared by Bureau Veritas North America, Inc. for Petro-Chem.
- The 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem.
- The 2021 Annual Groundwater Report Petro-Chem Processing Group of Nortru, LLC. This report was submitted to EGLE on February 28, 2022.

Copies of these reports have been submitted to EGLE. Petro-Chem will provide electronic copies of these reports upon request.

# B2.B.5(c) Rate, Amount, and Density of Gases Being Emitted

The 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem included a discussion of subsurface gas contamination investigations and (multi-phase extraction or MPE) pilot test investigation. A copy of this report has been provided to EGLE on November 17, 2016. The final west berm soil removal report and the final MPE pilot test report has been attached to this form as Volume I, Section 8, Appendix 1 and 2. Additional information is provided:

- Permit Application Volume IV, Section 1, Form B4 Environmental Assessment Report.
- Permit Application Volume IV, Section 2, Form B5 Environmental Monitoring Report.
- The 2007 Part 201 Exposure Pathway Analysis, Prepared by Bureau Veritas North America, Inc. for Petro-Chem.
- The 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem.
- The 2021 Annual Groundwater Report Petro-Chem Processing Group of Nortru, LLC. This report was submitted to EGLE on February 28, 2022.

Copies of these reports have been submitted to EGLE. Petro-Chem will provide electronic copies of these reports upon request.

# B2.B.5(d) Recommendations or Established Requirements for Additional Investigations

The 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem included a discussion of subsurface gas contamination investigations and (multi-phase extraction or MPE) pilot test investigation. A copy of this report has been provided to EGLE on November 17, 2016. The final west berm soil removal report and the final MPE pilot test report has been attached to this form as Volume I, Section 8, Appendix 1 and 2. Additional information is provided:

- Permit Application Volume IV, Section 1, Form B4 Environmental Assessment Report.
- Permit Application Volume IV, Section 2, Form B5 Environmental Monitoring Report.
- The 2007 Part 201 Exposure Pathway Analysis, Prepared by Bureau Veritas North America, Inc. for Petro-Chem.
- The 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem.
- The 2021 Annual Groundwater Report Petro-Chem Processing Group of Nortru, LLC. This report was submitted to EGLE on February 28, 2022.

Copies of these reports have been submitted to EGLE. Petro-Chem will provide electronic copies of these reports upon request.

# B2.C FACILITY'S EXPOSURE ASSESSMENT

Subsurface investigations including the multi-phase extraction pilot test investigation report have been discussed in Section B2.B.1 and B2.B.2 above.

The facility performed a Part 201 Pathway Analysis related to a potential release of hazardous substances that occurred as a result of a fire at the property in 2006. The results of the evaluation were submitted to Michigan DEQ in a report dated August 27, 2007. On August 11, 2008 the facility provide a final 201 exposure pathways report to DEQ. Additional exposure assessment and corrective measures has been provided in the 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem. Copies of these reports have been submitted to EGLE. Petro-Chem will provide electronic copies of these reports upon request.

# B2.C.1 Human Exposure and Threats

The facility performed a Part 201 Pathway Analysis related to a potential release of hazardous substances that occurred as a result of a fire at the property in 2006. The results of the evaluation were submitted to Michigan DEQ in a report dated August 27, 2007. On August 11, 2008 the facility provide a final 201 exposure pathways report to DEQ. Additional exposure assessment and corrective measures has been provided in the 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem. Copies of these reports have been submitted to EGLE. Petro-Chem will provide electronic copies of these reports upon request.

# B2.C.1(a) Exposure Pathway

The facility performed a Part 201 Pathway Analysis related to a potential release of hazardous substances that occurred as a result of a fire at the property in 2006. The results of the evaluation were submitted to Michigan DEQ in a report dated August 27, 2007. On August 11, 2008 the facility provide a final 201 exposure pathways report to DEQ. Additional exposure assessment and corrective measures has been provided in the 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem. Copies of these reports have been submitted to EGLE. Petro-Chem will provide electronic copies of these reports upon request.

# B2.C.1(b) Actual or Potential Receptors

The facility performed a Part 201 Pathway Analysis related to a potential release of hazardous substances that occurred as a result of a fire at the property in 2006. The results of the evaluation were submitted to Michigan DEQ in a report dated August 27, 2007. On August 11, 2008 the facility provide a final 201 exposure pathways report to DEQ. Additional exposure assessment and corrective measures has been provided in the 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem. Copies of these reports have been submitted to EGLE. Petro-Chem will provide electronic copies of these reports upon request.

# B2.C.1(c) Evidence of Exposure

The facility performed a Part 201 Pathway Analysis related to a potential release of hazardous substances that occurred as a result of a fire at the property in 2006. The results of the evaluation were submitted to Michigan DEQ in a report dated August 27, 2007. On August 11, 2008 the facility provide a final 201 exposure pathways report to DEQ. Additional exposure assessment and corrective measures has been provided in the 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem. Copies of these reports have been submitted to EGLE. Petro-Chem will provide electronic copies of these reports upon request.

# B2.C.2 Environmental Exposure and Threats

The facility performed a Part 201 Pathway Analysis related to a potential release of hazardous substances that occurred as a result of a fire at the property in 2006. The results of the evaluation were submitted to Michigan DEQ in a report dated August 27, 2007. On August 11, 2008 the facility provide a final 201 exposure pathways report to DEQ. Additional exposure assessment and corrective measures has been provided in the 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem. Copies of these reports have been submitted to EGLE. Petro-Chem will provide electronic copies of these reports upon request.

# B2.C.2(a) Exposure Pathway

The facility performed a Part 201 Pathway Analysis related to a potential release of hazardous substances that occurred as a result of a fire at the property in 2006. The results of the evaluation were submitted to Michigan DEQ in a report dated August 27, 2007. On August 11, 2008 the facility provide a final 201 exposure pathways report to DEQ. Additional exposure assessment and corrective measures has been provided in the 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem. Copies of these reports have been submitted to EGLE. Petro-Chem will provide electronic copies of these reports upon request.

# B2.C.2(b) Actual or Potential Receptors

The facility performed a Part 201 Pathway Analysis related to a potential release of hazardous substances that occurred as a result of a fire at the property in 2006. The results of the evaluation were submitted to Michigan DEQ in a report dated August 27, 2007. On August 11, 2008 the facility provide a final 201 exposure pathways report to DEQ. Additional exposure assessment and corrective measures has been provided in the 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem. Copies of these reports have been submitted to EGLE. Petro-Chem will provide electronic copies of these reports upon request.

# B2.C.2(c) Evidence of Exposure

The facility performed a Part 201 Pathway Analysis related to a potential release of hazardous substances that occurred as a result of a fire at the property in 2006. The results of the evaluation were submitted to Michigan DEQ in a report dated August 27, 2007. On August 11, 2008 the facility provide a final 201 exposure pathways report to DEQ. Additional exposure assessment and corrective measures has been provided in the 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem. Copies of these reports have been submitted to EGLE. Petro-Chem will provide electronic copies of these reports upon request. Additional information has been provided in the Environmental Assessment form B4 provided in Volume IV, Section 1 of the application.

# **B2.D INTERIM MEASURES**

The facility prepared a workplan in response to the letter received from Mr. David Slayton, Geologist with the Michigan Department of Environmental Quality, dated October 16, 2009. The letter indicated that a RFI Workplan would need to be prepared in order to address the discovery of MTBE in groundwater samples collected during the first semi-annual sampling event conducted in July 2009 (See Volume IV, for 2009 groundwater results). The MTBE discovery was considered a new release under License Condition VI.D.1. The Plan was initiated in November 2010 where soil borings were taken and analyzed. As a result, Petro-Chem prepared a RCRA Facility Investigation Work plan which was submitted to EGLE January of 2010. A copy of this 357-page plan will be provided upon request. The RFI plan was initiated in November 2010 where soil borings were collected and analyzed. Based on the RFI results, the facility prepared and implemented an interim and corrective measures plans which included the removal of soils from the southwest corner of the property. As part of the RFI and corrective measures, the facility has also submitted the following reports to EGLE which contain information on soil borings, sampling, and testing. Copies of these reports and studies will be provided upon request:

- RFI Report, Philip Environmental Services Division, Petro-Chem Processing Group Facility, 421 Lycaste Street, Detroit, Michigan, dated February 16, 2011.
- Amended Corrective Action Investigation Report, Petro-Chem Processing Group of Nortru, LLC, 421 Lycaste Street, Detroit, Michigan, dated November 20, 2015.
- Corrective Measures Study Investigation Report, Stericycle Environmental Solutions, Inc., Petro-Chem Processing Group Facility, 421 Lycaste Street, Detroit, Michigan, dated May 13, 2016.
- Corrective Measures Study, Stericycle Environmental Solutions, Inc., Petro-Chem Processing Group Facility, 421 Lycaste Street, Detroit 48214, Michigan, dated November 17, 2016.

The facility has completed the removal of the west berm soil stockpile (the interim and corrective measure) from the southwest corner of the property and has completed the multi-phase extraction (MPE) pilot test. The final west berm soil removal report and final MPE test report is attached to this form as Appendix 1 and Appendix 2 to Form B2 in Volume I, Section 8. Acceptance of the final interim measures and reinstatement of the SBS building is pending a letter of acceptance from EGLE.

## B2.D.1 MTBE Corrective Measures / RFI Work Plan, Soil Stockpile Removal and Multi-Phase Extraction (MPE)

## B2.D.1(a) Objective of the Measure

The RFI plan was initiated in November 2010 where soil borings were collected and analyzed. Corrective measures were provided in the 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem. The facility has completed the removal of the west berm soil stockpile (the interim and corrective measure) from the southwest corner of the property and has completed the multi-phase extraction (MPE) pilot test. The final west berm soil removal report and final MPE test report is attached to this form as Volume I, Section 8, Appendix 1 and Appendix 2. Acceptance of the final interim measures and reinstatement of the SBS building is pending a letter of acceptance from EGLE. Copies of these reports have been submitted to EGLE. Petro-Chem will provide electronic copies of these reports upon request.

# B2.D.1(b) Design and Construction

The RFI plan was initiated in November 2010 where soil borings were collected and analyzed. Corrective measures were provided in the 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem. The facility has completed the removal of the west berm soil stockpile (the interim and corrective measure) from the southwest corner of the property and has completed the multi-phase extraction (MPE) pilot test. The final west berm soil removal report and final MPE test report is attached to this form as Volume I, Section 8, Appendix 1 and Appendix 2. Acceptance of the final interim measures and reinstatement of the SBS building is pending a letter of acceptance from EGLE. Copies of these reports have been submitted to EGLE. Petro-Chem will provide electronic copies of these reports upon request.

# B2.D.1(c) Operation, Monitoring, and Maintenance

The RFI plan was initiated in November 2010 where soil borings were collected and analyzed. Corrective measures were provided in the 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem. The facility has completed the removal of the west berm soil stockpile (the interim and corrective measure) from the southwest corner of the property and has completed the multi-phase extraction (MPE) pilot test. The final west berm soil removal report and final MPE test report is attached to this form as Volume I, Section 8, Appendix 1 and Appendix 2. Acceptance of the final interim measures and reinstatement of the SBS building is pending a letter of acceptance from EGLE. Copies of these reports have been submitted to EGLE. Petro-Chem will provide electronic copies of these reports upon request.

# B2.D.1(d) Evaluation of Measure Effectiveness

The RFI plan was initiated in November 2010 where soil borings were collected and analyzed. Corrective measures were provided in the 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem. The facility has completed the removal of the west berm soil stockpile (the interim and corrective measure) from the southwest corner of the property and has completed the multi-phase extraction (MPE) pilot test. The final west berm soil removal report and final MPE test report is attached to this form as Volume I, Section 8, Appendix 1 and Appendix 2. Acceptance of the final interim measures and reinstatement of the SBS building is pending a letter of acceptance from EGLE. Copies of these reports have been submitted to EGLE. Petro-Chem will provide electronic copies of these reports upon request.

# B2.D.1(e) Proposed or Required Schedules for Continued Operation or Future Changes in the Measure

The RFI plan was initiated in November 2010 where soil borings were collected and analyzed. Corrective measures were provided in the 2016 Corrective Measures Study, Prepared by Bureau Veritas North America, Inc. for Petro-Chem. The facility has completed the removal of the west berm soil stockpile (the interim and corrective measure) from the southwest corner of the property and has completed the multi-phase extraction (MPE) pilot test. The final west berm soil removal report and final MPE test report is attached to this form as Volume I, Section 8, Appendix 1 and Appendix 2. Acceptance of the final interim measures and reinstatement of the SBS building is pending a letter of acceptance from EGLE. Copies of these reports have been submitted to EGLE. Petro-Chem will provide electronic copies of these reports upon request.

# **B2.E ENVIRONMENTAL INDICATORS**

The completed environmental indicator forms for Human Exposure to Contamination and Migration of Contaminated Groundwater have been attached to this EGLE as attachment B2.E1. Neither form identified any environmental indicators that suggest human exposure to contamination or the migration of contaminated groundwater off-site.

# B2.F FACILITY'S ASSESSMENT OF KNOWN OR PROPOSED CONSTITUENTS OF CONCERN

[R 299.9629(3)(a)(i) and (3)(b)(i)]

The facility performed a Part 201 Pathway Analysis related to a potential release of hazardous substances that occurred as a result of a fire at the property in 2006. The results of the evaluation were submitted to Michigan DEQ in a report dated August 27, 2007. On August 11, 2008 the facility provide a final 201 exposure pathways report to DEQ.

The 2016 Corrective Measures report addressed the historic MTBE release, corrective measures including soil removal and Multi Phase Extraction (MPE) pilot study.

The PFAS Groundwater Sampling Report provided to EGLE on December 8, 2020 indicated drinking water and groundwater surface water interface are not applicable pathways due to the following: (1) offsite sewers are not intercepting groundwater, (2) onsite sewers are set above the water bearing zone, (3) the presence of a peat layer which retards the potential for offsite migration, and (4) the absence of private drinking water wells within at least 3 miles of the Site. Therefore, further action regarding PFAS is not warranted at this time.

## B2.G ESTABLISHED OR PROPOSED CLEANUP CRITERIA

[R 299.9629(3)(a)(ii) and (iii) and R 299.9629(3)(b)(ii) and (iii)]

The facility performed a Part 201 Pathway Analysis related to a potential release of hazardous substances that occurred as a result of a fire at the property in 2006. The results of the evaluation were submitted to Michigan DEQ in a report dated August 27, 2007. On August 11, 2008 the facility provided a final 201 exposure pathways report to DEQ.

The 2016 Corrective Measures report addressed the historic MTBE release, corrective measures including soil removal and Multi Phase Extraction (MPE) pilot study.

The PFAS Groundwater Sampling Report provided to EGLE on December 8, 2020 indicated drinking water and groundwater surface water interface are not applicable pathways due to the following: (1) offsite sewers are not intercepting groundwater, (2) onsite sewers are set above the water bearing zone, (3) the presence of a peat layer which retards the potential for offsite migration, and (4) the absence of private drinking water wells within at least 3 miles of the Site. Therefore, further action regarding PFAS is not warranted at this time.

# B2.H ESTABLISHED OR PROPOSED COMPLIANCE POINTS AND PERIODS

[R 299.9629(3)(a)(iv) and (v) and R 299.9629(3)(b)(iv) and (v)]

The facility performed a Part 201 Pathway Analysis related to a potential release of hazardous substances that occurred as a result of a fire at the property in 2006. The results of the evaluation were submitted to Michigan DEQ in a report dated August 27, 2007. On August 11, 2008 the facility provide a final 201 exposure pathways report to DEQ.

The 2016 Corrective Measures report addressed the historic MTBE release, corrective measures including soil removal and Multi Phase Extraction (MPE) pilot study.

The PFAS Groundwater Sampling Report provided to EGLE on December 8, 2020 indicated drinking water and groundwater surface water interface are not applicable pathways due to the following: (1) offsite sewers are not intercepting groundwater, (2) onsite sewers are set above the water bearing zone, (3) the presence of a peat layer which retards the potential for offsite migration, and (4) the absence of private drinking water wells within at least 3 miles of the Site. Therefore, further action regarding PFAS is not warranted at this time.

# B2.I OFF-SITE ACCESS

The facility performed a Part 201 Pathway Analysis related to a potential release of hazardous substances that occurred as a result of a fire at the property in 2006. The results of the evaluation were submitted to Michigan DEQ in a report dated August 27, 2007. On August 11, 2008 the facility provide a final 201 exposure pathways report to DEQ.

The 2016 Corrective Measures report addressed the historic MTBE release, corrective measures including soil removal and Multi Phase Extraction (MPE) pilot study.

The PFAS Groundwater Sampling Report provided to EGLE on December 8, 2020 indicated drinking water and groundwater surface water interface are not applicable pathways due to the following: (1) offsite sewers are not intercepting groundwater, (2) onsite sewers are set above the water bearing zone, (3) the presence of a peat layer which retards the potential for offsite migration, and (4) the absence of private drinking water wells within at least 3 miles of the Site. Therefore, further action regarding PFAS is not warranted at this time.

# B2.J PUBLIC INVOLVEMENT PLAN

Michigan EGLE Staff held public webinar meeting on February 13, 2020 and an in-person meeting on March 5, 2020 at Wayne State University. A copy of the webinar presentation is available at <a href="https://www.youtube.com/watch?v=u8">https://www.youtube.com/watch?v=u8</a> frIUICQ. The meeting covered the following reports:

The Part 201 Pathway Analysis related to a potential release of hazardous substances that occurred as a result of a fire at the property in 2006. The results of the evaluation were submitted to Michigan DEQ in a report dated August 27, 2007. On August 11, 2008 the facility provide a final 201 exposure pathways report to DEQ.

The 2016 Corrective Measures report addressed the historic MTBE release, corrective measures including soil removal and Multi Phase Extraction (MPE) pilot study. **B2.K HEALTH AND SAFETY PLAN** 

The facility performed a Part 201 Pathway Analysis related to a potential release of hazardous substances that occurred as a result of a fire at the property in 2006. The results of the evaluation were submitted to Michigan DEQ in a report dated August 27, 2007. On August 11, 2008 the facility provide a final 201 exposure pathways report to DEQ.

The 2016 Corrective Measures report addressed the historic MTBE release, corrective measures including soil removal and Multi Phase Extraction (MPE) pilot study. The studies and corrective actions included health and safety plan. Electronic copies of the reports and plans can be provided upon request.

#### B2.L NOTICE REQUIREMENTS [R 299.9525]

The facility has submitted the legal description of the property indicating the property has been used and is subject to corrective action requirements of Part 111. Any required notice complied with 1 of 1937 PA 103, as amended, being MCL 565.201 et seq. The facility does not have any restrictive covenants with the Wayne County Register of Deeds. A copy of the deed will be provided upon request.

## B2.M JUSTIFICATION FOR PROPOSED ELIMINATION OF ANY WASTE MANAGEMENT UNIT FROM THE CORRECTIVE ACTION PROGRAM OR INTENT TO PROCEED WITH CORRECTIVE ACTIONS

The facility is not proposing to eliminate any waste management units from the corrective action program.

# ATTACHMENT B2.E.1

# ENVIRONMENTAL INDICATOR FORMS

# DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

EGLE adapted to Word 8/07

## RCRA Corrective Action Environmental Indicator (EI) RCRA Info Code (CA725) Current Human Exposures Under Control

Facility Name:	Petro-Chem Processing Group of Nortru, LLC
Facility Address:	421 Lycaste, Detroit Michigan
Facility EPA ID #:	MID 980 615 298

1. Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to Resource Conservation Recovery Act of 1976 (RCRA) Corrective Action (e.g., waste management unit [WMU], regulated unit [RU], and area of concern [AOC]), been **considered** in this EI determination?

	$\sim 1$	
1	~ 1	
1	/ N	

- If yes check here and continue with #2 below.
- If no reevaluate existing data, or
- If data are not available, skip to #6 and enter "IN" (more information needed) status code.

# BACKGROUND

## Definition of Environmental Indicators (for the RCRA Corrective Action)

Els are measures being used by the RCRA Corrective Action Program to go beyond programmatic activity measures (reports received and approved, etc.) to track changes in the quality of the environment. The two Els developed to date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An El for nonhuman (ecological) receptors is intended to be developed in the future.

## Definition of "Current Human Exposures Under Control" El

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA Corrective Action at or from the identified facility [i.e., site-wide]).

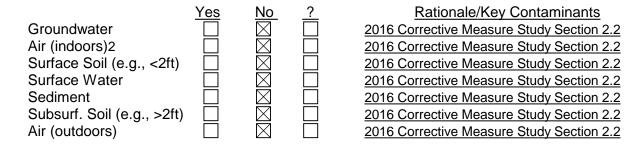
## **Relationship of EI to Final Remedies**

While final remedies remain the long-term objective of the RCRA Corrective Action Program the Els are near-term objectives that are currently being used as program measures for the Government Performance and Results Act of 1993 (GPRA). The "Current Human Exposures Under Control" Els are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action Program's overall mission to protect human health and the environment requires that final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

## Duration/Applicability of El Determinations

El determinations status codes should remain in the RCRA Info national database ONLY as long as they remain true (i.e., RCRA Info status codes must be changed when the regulatory authorities become aware of contrary information).

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be "**contaminated**"<sup>1</sup> above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from WMUs, RUs or AOCs)?



- If no (for all media) **skip to #6**, and enter "YE", status code after providing or citing appropriate "levels" and referencing sufficient supporting documentation demonstrating that these "levels" are not exceeded.
  - If yes (for any media) continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

If unknown (for any media) – skip to #6 and enter "IN" status code.

Rationale and Reference(s):

## 2016 Corrective Measure Study Section 2.2

<sup>1 &</sup>quot;Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

<sup>2</sup> Recent evidence (from the Colorado Department of Public Health and Environment, and others) suggests that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above [and adjacent to] groundwater with volatile contaminants) does not present unacceptable risks.

3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

## Summary Exposure Pathway Evaluation Table

Contaminated Media	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food <sup>3</sup>
Groundwater							
Air (indoors)							
Soil (surface, e.g., <2 ft)							
Surface Water							
Sediment							
Soil (subsurface e.g., >2 ft)							
Air (outdoors)							

## Potential <u>Human Receptors</u> (Under Current Conditions)

Instructions for <u>Summary Exposure Pathway Evaluation Table</u>:

- A. Strike-out specific Media including Human Receptors' spaces for Media which are not "contaminated" as identified in #2 above.
- B. Enter "yes" or "no" for potential "completeness" under each "Contaminated" Media Human Receptor Combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations, some potential "Contaminated" Media – Human Receptor combinations (Pathways) do not have check spaces ("[]"). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

☐ If no (Pathways are not complete for any contaminated media-receptor combination) – skip to #6, and enter "YE" status code, after explaining and/or referencing conditions(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional <u>Pathway Evaluation Work Sheet</u> to analyze major pathways).

<sup>3</sup> Indirect Pathway/Receptor (vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.).

If yes (Pathways are complete for any "Contaminated" Media – Human Receptor combination) – continue after providing supporting explanation.

If unknown (for any "Contaminated" Media – Human Receptor combination) – skip to #6 and enter "IN" status code.

Rationale and Reference(s)

- 4. Can the **exposures** from any of the complete Pathways identified in #3 be reasonably expected to be "**significant**"<sup>4</sup> (i.e., potentially "unacceptable" because exposures can be reasonably expected to be: (1) greater in magnitude [intensity, frequency and/or duration] than assumed in the derivation of the acceptable "levels" [used to identify the "contamination"]; or (2) the combination of exposure magnitude [perhaps even though low] and contaminant concentrations [that may be substantially above the acceptable "levels"] could result in greater than acceptable risks)?
  - ☐ If no (exposures cannot be reasonably expected to be significant [i.e., potentially "unacceptable"] for any complete exposure pathway) – skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant".
  - ☐ If yes (exposures could be reasonably expected to be "significant" [i.e., potentially "unacceptable"] for any complete exposure pathway) – continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

If unknown (for any complete pathway) - skip to #6 and enter "IN" status code.

Rationale and Reference(s):

- 5. Can the "significant" exposures (identified in #4) be shown to be within acceptable limits?
  - ☐ If yes (all "significant" exposures have been shown to be within acceptable limits) continue and enter "YE" after summarizing <u>and</u> referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

☐ If no (there are current exposures that can be reasonably expected to be "unacceptable") -

<sup>4</sup>If there is any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.

☐ If unknown (for any potentially "unacceptable" exposure) – continue and enter "IN" status code.

Rationale and Reference(s):

Completed by

- 6. Check the appropriate RCRA Info status codes for the Current Human Exposures Under Control EI Code (CA725), obtain supervisory signature and date on the EI determination below, and attach appropriate supporting documentation as well as a map of the facility.
  - YE Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the <u>Petro-Chem</u> facility, EPA ID # MID 980 615 298, located at 421 Lycaste, Detroit Michigan under current and reasonably expected conditions. This determination will be reevaluated when the agency/state becomes aware of significant changes at the facility.

NO – "Current Human Exposures" are NOT "Under Control."

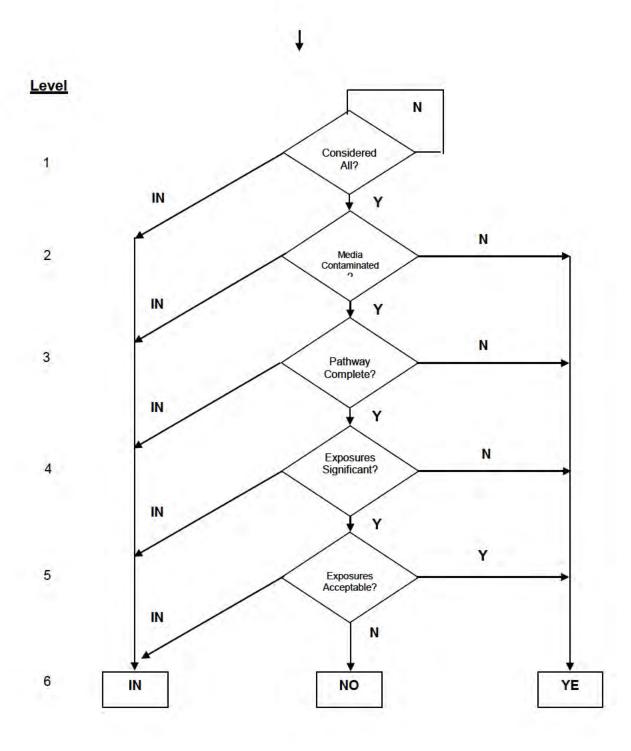
□ IN – More information is needed to make a determination.

Completed by.		Date. (type date)
	(type name) (type title) Materials Management Division Michigan Department of Environment, Great Lakes, and 517	Energy
Supervisor:		Date: (type date)
	(type name)	Date: (type date)
	(type title)	
	Materials Management Division	
	Michigan Department of Environment, Great Lakes, and	Energy
	517	
Locations whe	re references may be found:	
	Hazardous Waste Section facility files at:	
	Materials Management Division	
	Michigan Department of Environment, Great Lakes, and	Energy
	525 West Allegan Street	
	Lansing, Michigan 48933	
Contact e-mail	l addresses:	
	(type name) - (type e-mail)	
	(type name) - (type e-mail)	

Data: (turna data)

**Final Note:** The human exposures EI is a qualitative screening of exposures and the determinations within this document should not be used as the sole basis for restricting the scope of more detailed (e.g., site-specific) assessments of risk.

Facility Name: Petro-Chem Processing Group of Nortru, LLC EPA ID#: MID 980 615 298 City/State: Detroit, Michigan



Form EQP5111 Attachment Template B2

# DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

EGLE adapted to Word 8/07

# RCRA Corrective Action Environmental Indicator (EI) RCRA Info Code (CA750) Migration of Contaminated Groundwater Under Control

Facility Name:	Petro-Chem Processing Group of Nortru, LLC
Facility Address:	421 Lycaste, Detroit Michigan
Facility EPA ID #:	MID 980 615 298

- 1. Has **all** available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from waste management units (WMU), regulated units (RU), and areas of concern (AOC)), been **considered** in this El determination?
  - If yes check here and continue with #2 below.
  - If no reevaluate existing data, or
  - If data are not available, skip to #8 and enter "IN" (more information needed) status code.

## BACKGROUND

## Definition of Environmental Indicators (for the RCRA Corrective Action)

Els are measures being used by the RCRA Corrective Action Program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two Els developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An El for nonhuman (ecological) receptors is intended to be developed in the future.

## Definition of "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA Corrective Action at or from the identified facility [i.e., site-wide]).

## **Relationship of El to Final Remedies**

While final remedies remain the long-term objective of the RCRA Corrective Action Program the EIs are near-term objectives that are currently being used as program measures for the Government Performance and Results Act of 1993, (GPRA). The "Migration of Contaminated

Groundwater Under Control" El pertains ONLY to the physical migration (i.e., further spread) of contaminated groundwater and contaminants within groundwater (e.g., nonaqueous phase liquids or NAPLs). Achieving this El does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

## **Duration/Applicability of El Determinations**

El determinations status codes should remain in the RCRA Info national database ONLY as long as they remain true (i.e., RCRA Info status codes must be changed when the regulatory authorities become aware of contrary information).

- 2. Is **groundwater** known or reasonably suspected to be "**contaminated**"<sup>1</sup> above appropriately protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?
  - If yes continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.
  - If no skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated."
  - If unknown skip to #8 and enter "IN" status code.

Rationale and Reference(s):

A workplan was prepared in response to the letter received from Mr. David Slayton, Geologist with the Michigan Department of Environmental Quality, dated October 16, 2009. The letter indicated that a RFI Workplan would need to be prepared in order to address the discovery of MTBE in groundwater samples collected during the first semi-annual sampling event conducted in July 2009 (See Volume IV, for 2009 groundwater results). The MTBE discovery is considered a new release under License Condition VI.D.1. The RFI Plan was initiated in November 2010 where soil borings were taken and analyzed.

Since the last permit reissuance, the facility has completed the removal of the soil stockpile (an interim measure) from the southwest corner of the property and has completed the multi-phase extraction (MPE) pilot test. The final west soil removal report and the MPE test report are attached to this form as Appendix 1 and Appendix 2.

- 3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"<sup>2</sup> as defined by the monitoring locations designated at the time of this determination)?
  - If yes continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the

"existing area of groundwater contamination"<sup>2</sup>.

If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"<sup>2</sup>) – skip to #8 and enter "NO" status code, after providing an explanation.



If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

2016 Corrective Measure Study Section 2.2.

A workplan was prepared in response to the letter received from Mr. David Slayton, Geologist with the Michigan Department of Environmental Quality, dated October 16, 2009. The letter indicated that a RFI Workplan would need to be prepared in order to address the discovery of MTBE in groundwater samples collected during the first semi-annual sampling event conducted in July 2009 (See Volume IV, for 2009 groundwater results). The MTBE discovery is considered a new release under License Condition VI.D.1. The RFI plan was initiated in November 2010 where soil borings were taken and analyzed. Since the last permit reissuance, the facility has completed the removal of the soil stockpile (an interim measure) from the southwest corner of the property and has completed the multi-phase extraction (MPE) pilot test. The final west soil removal report and the MPE test report are attached to this form as Appendix 1 and Appendix 2.

4. Does "contaminated" groundwater discharge into surface water bodies?

If yes - continue after identifying potentially affected surface water bodies.

- If no skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.

If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

5. Is the **discharge** of "contaminated" groundwater into surface water likely to be "insignificant" (i.e., the maximum concentration<sup>3</sup> of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions [e.g., the nature, and number, of discharging contaminants, or environmental setting], that significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: (1) the maximum known or reasonably suspected concentration<sup>3</sup> of key contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and (2) provide a statement of

professional judgment/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

☐ If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: (1) the maximum known or reasonably suspected concentration<sup>3</sup> of each contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and (2) for any contaminants discharging into surface water in concentrations<sup>3</sup> greater than 100 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

] If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

- 6. Can the discharge of "contaminated" groundwater into surface water be shown to be "currently acceptable" (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented<sup>4</sup>)?
  - If yes continue after either: (1) identifying the final remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site's surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR (2) providing or referencing an interim-assessment,<sup>5</sup> appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors that should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment "levels," as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.
  - ☐ If no (the discharge of "contaminated" groundwater can not be shown to be "**currently acceptable**") skip to #8 and enter "NO" status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

If unknown - skip to 8 and enter "IN" status code.

Rationale and Reference(s):

- 7. Will groundwater **monitoring**/measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"
  - If yes continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination."
  - If no enter "NO" status code in #8.
  - If unknown enter "IN" status code in #8.

Rationale and Reference(s):

A workplan was prepared in response to the letter received from Mr. David Slayton, Geologist with the Michigan Department of Environmental Quality, dated October 16, 2009. The letter indicated that a RFI Workplan would need to be prepared in order to address the discovery of MTBE in groundwater samples collected during the first semi-annual sampling event conducted in July 2009 (See Volume IV, for 2009 groundwater results). The MTBE discovery is considered a new release under License Condition VI.D.1.The RFI plan was initiated in November 2010 where soil borings were taken and analyzed. Since the last permit reissuance, the facility has completed the removal of the soil stockpile (an interim measure) from the southwest corner of the property and has completed the multi-phase extraction (MPE) pilot test. The final west soil removal report and the MPE test report is are attached to this form as Volume I, Section 8, Appendix 1 and Appendix 2.

The 2021 annual groundwater monitoring plan was provided to EGLE on February 28, 2022. Copies of this 463-page report and previous reports will be provided upon request.

2016 Corrective Measure Study Section 2.2

- 8. Check the appropriate RCRA Info status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), obtain supervisor signature and date on the EI determination below, and (attach appropriate supporting documentation as well as a map of the facility.
  - YE Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the Petro-Chem facility, EPA ID # MID 980 615 29, located at 421 Lycaste, Detroit Michigan. Specifically, this determination indicates that the migration of "contaminated" groundwater

is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater." This determination will be reevaluated when the agency/state becomes aware of significant changes at the facility.

NO - Unacceptable migration of contaminated groundwater is observed or expected.

IN - More information is needed to make a determination.

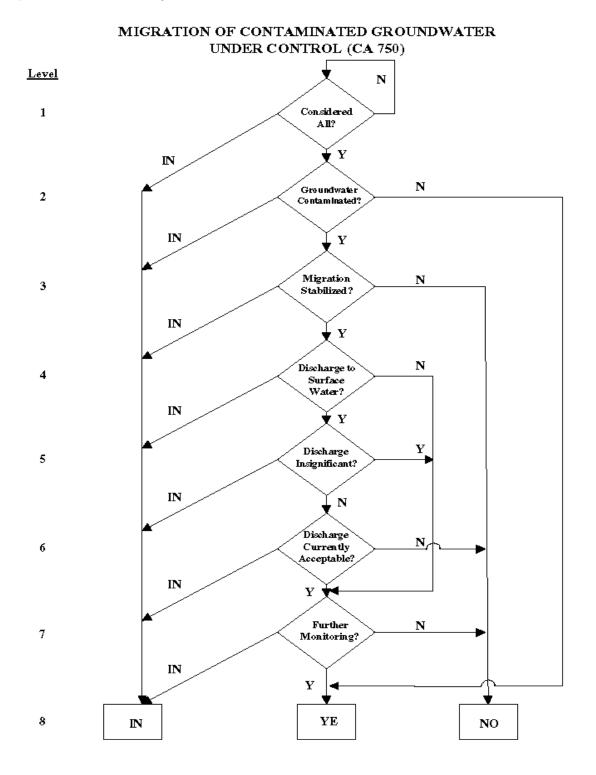
Completed by:		Date (type date)
	(type name)	
	(type title)	
	Materials Management Division	
	Michigan Department of Environment, Great Lakes, and 517	Energy
Supervisor:		Date (type date)
	(type name) (type title) Materials Management Division Michigan Department of Environment, Great Lakes, and	
Locations wher	e references may be found:	
ł	Hazardous Waste Section facility files at:	
	Materials Management Division	
	Michigan Department of Environment, Great Lakes, and	Energy
ţ	525 West Allegan Street	

Contact e-mail addresses:

(type name)	<u>- (type e-mail)</u>
(type name)	- (type e-mail)

Lansing, Michigan 48933

Facility Name: Petro-Chem Processing Group of Nortru, LLC EPA ID#: MID 980 615 298 City/State: Detroit, Michigan



Appendix I

Final West Berm Soil Removal



May 6, 2020

Mr. Dan Dailey Michigan Department of Environmental Quality Management and Tracking Unit Hazardous Waste Section PO Box 30241 Lansing, MI 48909

Subject: Western Berm Soil Removal Report for Petro-Chem Processing Group of Nortru, LLC Detroit, MI. MID 980 615 298

Dear Mr. Dailey:

Enclosed please find the *Western Berm Soil Removal Report* for the removal of the western berm as outlined in the Corrective Measures Implementation Work Plan for Petro-Chem Processing Group of Nortru, LLC site.

If you have any questions, please contact me at 215-822-2337.

Sincerely,

Greg Fink EHS Director

cc: Ed Burke, Stericycle Kellie Wing, Bureau Veritas

2337 North Penn Rd. Hatfield, PA 19440

Western Berm Soil Removal Report Nortru, LLC Petro-Chem Processing Group Facility 421 Lycaste Street, Detroit, MI

May 6, 2020

#### CERTIFICATION STATEMENT

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to 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.

Greg Fink EHS Director

APEX COMPANIES, LLC

## Western Berm Soil Removal Report

Petro-Chem Processing Group of Nortru, LLC 421 Lycaste Street Detroit, Michigan

MID 980 615 298

May 6, 2020 Project Number 11019-000128.00

Prepared for: Stericycle Environmental Solutions, Inc. Detroit, Michigan

Apex Companies, LLC 46555 Humboldt Drive Suite 103 Novi, MI 48377





Apex Companies, LLC (Apex) is pleased to submit this report of the removal of the soil stockpiled in the Western Soil Berm area at the Petro-Chem Processing Group of Nortru, LLC (Petro-Chem) facility located at 421 Lycaste Street in Detroit, Michigan (Figure 1). Apex conducted the removal as outlined in the *Revised Corrective Measures Implementation Work Plan (CMIP)*, prepared by Bureau Veritas North America, Inc., now known as Apex, dated February 18, 2019. The Michigan Department of Environment, Great Lakes, and Energy (EGLE) provided partial approval of the work plan as an interim measure for the site.

The CMIP identified the removal of the soil stockpile as one of the steps necessary prior to conducting a multi-phase extraction (MPE) pilot test. Prior to removal, the soil stockpiled in the Western Soil Berm area measured approximately 180 feet long by 15 feet wide and 6 feet in height and was estimated to have a volume of 500 cubic yards. The field activities conducted involved the removal of the soil stockpile which was excavated and direct loaded into trucks for transportation to the Woodland Meadow Landfill in Wayne, Michigan, a licensed non-hazardous disposal facility.

The following sections describe activities that were conducted for this task.

#### SITE-SPECIFIC HEALTH AND SAFETY PLAN

Prior to implementing the field evaluation, a site-specific Health and Safety Plan (HASP) was prepared in accordance with the requirements of Title 29 of the Code of Federal Regulations, Section 1910.120 (29 CFR 1910.120). The HASP provided a site-specific scope of work, safety precautions, emergency response procedures, nearest hospital information and reported the suspected constituents of concern that may be present at the site. Prior to the initiation of field activities, a site safety briefing was conducted to evaluate potential physical and chemical hazards and outlined measures to be taken in the event of an emergency, and onsite personnel responsible for managing emergency situations.

#### UNDERGROUND UTILITY CLEARANCE

Prior to commencement of the excavation soil activities, Apex notified Miss Dig Utility<sup>®</sup> locating service of the intent to conduct excavation activities. The utility service was notified on November 19, 2019, and Confirmation Request #20191119 was received immediately after the notification.

Apex also contracted the services of Ground Penetrating Radar Systems, LLC (GPRS), a private utility locator, to scan the project area for the presence of private and public underground utilities or subsurface anomalies that may indicate an object underground. GPRS under the direction of Apex personnel conducted the field scan on November 27, 2019.

#### FIELD ACTIVITIES

Prior to conducting the fieldwork, the soil was profiled utilizing laboratory analysis from samples previously collected in the stockpile area. A copy of the soil analytical results used to represent the soil stockpile is included as Attachment A. Monitoring wells MW-10 and MW-11 within the work area were marked and protected to prevent damage with the heavy equipment during the excavation.

Apex completed the stockpile removal from December 4 through December 6, 2019. A total of 15, 40 cubic yard trucks (708.55 tons as weighed at the landfill), were loaded and transported for disposal under non-hazardous waste manifest to the Woodlands Meadow Landfill located at 5900



Hannan Road in Wayne, Michigan by Farmer and Underwood Trucking. Copies of the nonhazardous waste manifests are included in Attachment B.

Excavation and loading activities were performed with a track excavator and a front loader within the immediate work area. After loading, each truck was logged in a field sheet, and its load transported under manifest to the disposal facility. Once the stockpile was removed the terrain matched the elevation of the surrounding area. Photos of the field activities are included behind the *Photographs* sheet.

On December 11, 2019, the casing for Monitoring Well MW-11 was cut to account for the change in the surrounding ground surface elevation and the steel protective casing was re-installed and cemented in place.

#### CLOSING

At the conclusion of the work, the former West Berm Area surface was graded in a manner that matched the immediate surrounding areas and allowed for upcoming remedial activities as presented in the CMIP.



# Western Berm Soil Removal Report for

Petro-Chem Processing Group of Nortru, LLC 421 Lycaste Street Detroit, Michigan

Prepared for: Stericycle Environmental Solutions, Inc. Detroit, Michigan

Project No. 11019-000128.00

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Kellie L. Wing Program Manager

Yardie

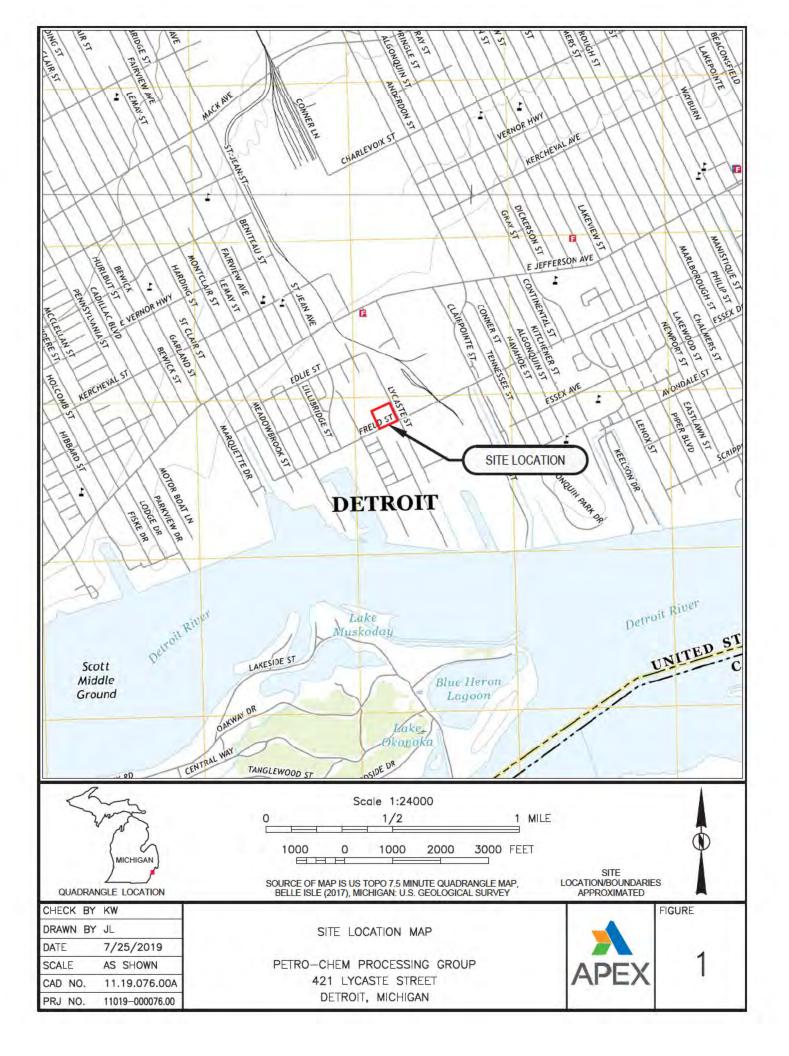
Gustavo Valdivia, P.E. Program Manager

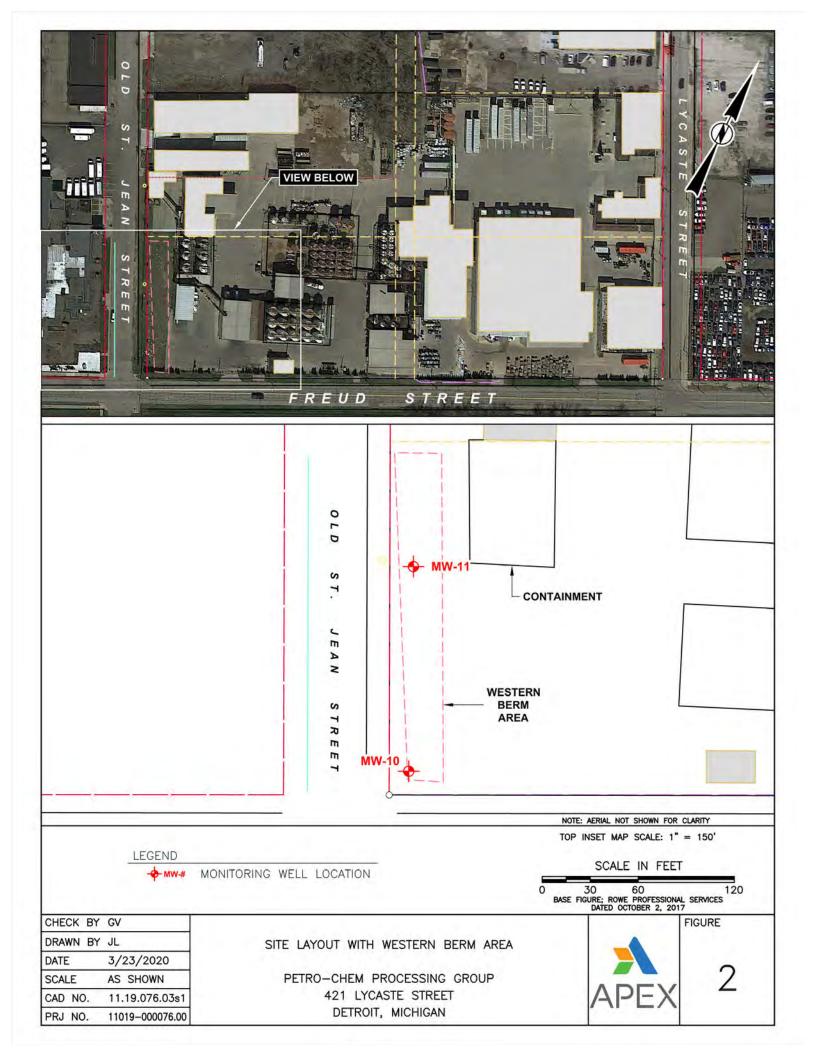
Apex Companies, LLC Health, Safety and Environmental Services

May 6, 2020



FIGURES







## PHOTOGRAPHS



Project No.	Description	Photo No. 1 – Partial View of West Berm Area Prior to Removal - Facing North	December 4-6,
11019-000128.00	Site Name	Petro-Chem, 421 Lycaste, Detroit, MI	2019
	Client	Clean Earth	





		<image/>	
Project No.	Description	Photo No. 3 – Stockpiled Material Prior to Loading	December 4-6,
11019-000128.00	Site Name	Petro-Chem, 421 Lycaste, Detroit, MI	2019
	Client	Clean Earth	





Bureau Veritas	Description	Photo No. 5 – View of West Berm Area Looking North After Removal of Berm	December 4-6,	
Project No. 11019-000128.00	Site Name	Petro-Chem, 421 Lycaste, Detroit, MI	2019	
11010 000120.00	Client	Clean Earth		





## APPENDIX A

## SOIL ANALYTICAL RESULTS OF WEST BERM SAMPLES



Client Identification:	Bureau Veritas North America,	Sample Description:	BSB-44 (2-4)	Chain of Custody:	147158
Client Project Name:	Inc. PSC - Detroit	Sample No:	11	Collect Date:	03/15/16
Client Project No:	NA	Sample Matrix:	Soil/Solid	Collect Time:	12:59
Sample Comments:	Soil results have been calculated and	d reported on a dry weig	ht basis unless otherwise no	ted.	
Definitions:	O: Qualifier (see definitions at end of r	enort) NA: Not Applicable	e t · Parameter not included i	in NELAC Scope of Analysis	

Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis. Definitions:

Water (Moisture) Content Dried at 105 ± 5°C Method: ASTM D2216-10						72301-011 Matrix: So BSB-44 (2-4)		oil/Solid		
Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prepa P. Date	ration P. Batch	A. Date	Analysis A. Batch	Init.
1. Percent Moisture (Water Content)	13		%	1	1.0	03/18/16	MC160318	03/21/16	MC160318	BMG

Volatile Organic Compounds (VOCs) by GO Method: EPA 5035A/EPA 8260B	C/MS, 5035				72301-011A BSB-44 (2-4)	Matrix: So	oil/Solid		
				chption.	Prepa	ration	Δ	nalysis	
Parameter(s)	Result	Q Units	Reporting Limit	Dilution	P. Date	P. Batch	A. Date	A. Batch	Init.
1. Acetone	U	µg/kg	1000	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
2. Acrylonitrile	U	µg/kg	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
3. Benzene	170	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
4. Bromobenzene	U	µg/kg	57	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
5. Bromochloromethane	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
6. Bromodichloromethane	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
7. Bromoform	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
8. Bromomethane	U	µg/kg	230	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
9.t-Butanol	U	µg/kg	2500	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
10.2-Butanone	U	µg/kg	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
11.n-Butylbenzene	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
12. sec-Butylbenzene	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
13. tert-Butylbenzene	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
14. Carbon Disulfide	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
15. Carbon Tetrachloride	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
16. Chlorobenzene	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
17. Chloroethane	U	µg/kg	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
18. Chloroform	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
19. Chloromethane	U	µg/kg	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
‡ 20. Cyclohexane	U	µg/kg	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
21. Dibromochloromethane	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
22.1,2-Dibromo-3-chloropropane (SIM)	U	µg/kg	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
23. Dibromomethane	U	µg/kg	57	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
24.1,2-Dichlorobenzene	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
25.1,3-Dichlorobenzene	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
26.1,4-Dichlorobenzene	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
27.trans-1,4-Dichloro-2-butene (SIM)	U	μg/kg	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
28. Dichlorodifluoromethane	U	µg/kg	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
29.1,1-Dichloroethane	180	μg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
30.1,2-Dichloroethane	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	

1914 Holloway Drive 11766 E. Grand River 8660 S. Mackinaw Trail Holt, MI 48842 Brighton, MI 48116 Cadillac, MI 49601

T: (517) 699-0345 T: (810) 220-3300 T: (231) 775-8368 F: (517) 699-0388 F: (810) 220-3311 F: (231) 775-8584

lab@fibertec.us



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Dale.	

Sample Comments:	Soil results have been calculated and reported on a dry weight basis unless otherwise noted.							
Client Project No:	NA	Sample Matrix:	Soil/Solid	Collect Time:	12:59			
Client Project Name:		Sample No:	11	Collect Date:	03/15/16			
Client Identification:	Bureau Veritas North America, Inc.	Sample Description:	BSB-44 (2-4)	Chain of Custody:	147158			

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable <sup>‡</sup>: Parameter not included in NELAC Scope of Analysis.

Volatile Organic Compounds (VOCs) by	GC/MS, 5035			-		72301-011A	Matrix: So	oil/Solid		
Method: EPA 5035A/EPA 8260B				Des	cription:	BSB-44 (2-4)				
	Desult	~	11-14-	Dementing a Lingit	Dilution	Prepa			nalysis	l a l t
Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	P. Date	P. Batch	A. Date	A. Batch	Init.
31.1,1-Dichloroethene	U		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
32.cis-1,2-Dichloroethene	90		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
33. trans-1,2-Dichloroethene	U		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
34.1,2-Dichloropropane	U		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
35. cis-1,3-Dichloropropene	U		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
36.trans-1,3-Dichloropropene	U		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
37. Diethyl Ether	U		µg/kg	200	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
‡ 38. Diisopropyl Ether	U		µg/kg	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
‡ 39.ETBE	U		µg/kg	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
40. Ethylbenzene	4700		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
41. Ethylene Dibromide	U		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
‡ 42. Hexachloroe hane	U		µg/kg	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
43.2-Hexanone	U		µg/kg	570	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
44. Isopropylbenzene	130		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
45.4-Isopropyltoluene	U		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
46. Methylene Chloride	200		µg/kg	100	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
‡ 47.2-Methylnaphthalene	U		µg/kg	290	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
48.4-Methyl-2-pentanone	U		µg/kg	290	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
49.MTBE	U		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
50. Naphthalene	U		µg/kg	290	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
51.n-Propylbenzene	140		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
52. Styrene	U		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
‡ 53.TAME	U		µg/kg	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
54.1,1,1,2-Tetrachloroethane	U		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
55.1,1,2,2-Tetrachloroethane	U		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
56. Tetrachloroethene	U		µg/kg	54	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
‡ 57. Tetrahydrofuran	U		µg/kg	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
58.Toluene	2000		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
59.1,2,3-Trichlorobenzene	U		µg/kg	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
60.1,2,4-Trichlorobenzene	U		µg/kg	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
61.1,1,1-Trichloroethane	110		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
62.1,1,2-Trichloroethane	U		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
63. Trichloroethene	U		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
64. Trichlorofluoromethane	U		µg/kg	57	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
65.1,2,3-Trichloropropane	U		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
\$ 66.1,2,3-Trimethylbenzene	U		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	
67.1,2,4-Trimethylbenzene	150		µg/kg	110	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR

1914 Holloway Drive 11766 E. Grand River 8660 S. Mackinaw Trail Holt, MI 48842 Brighton, MI 48116 Cadillac, MI 49601

T: (517) 699-0345 T: (810) 220-3300 T: (231) 775-8368

F: (517) 699-0388 F: (810) 220-3311 F: (231) 775-8584



Ľ	ate:	

Sample Comments:	Soil results have been calculated and reported on a dry weight basis unless otherwise noted.								
Client Project No:	NA	Sample Matrix:	Soil/Solid	Collect Time:	12:59				
Client Project Name:		Sample No:	11	Collect Date:	03/15/16				
Client Identification:	Bureau Veritas North America, Inc.	Sample Description:	BSB-44 (2-4)	Chain of Custody:	147158				

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable <sup>‡</sup>: Parameter not included in NELAC Scope of Analysis.

Volatile Organic Compounds (VOCs) b Method: EPA 5035A/EPA 8260B	-	Aliquot ID: 7 Description: E		Matrix: Soil/Solid						
						Prepa	ration	A	nalysis	
Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	P. Date	P. Batch	A. Date	A. Batch	Init.
68.1,3,5-Trimethylbenzene	130		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
69. Vinyl Chloride	U		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
70.m&p-Xylene	3900		µg/kg	100	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
71.o-Xylene	590		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
‡ 72. Xylenes	4500		µg/kg	150	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR

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Client Identification:	Bureau Veritas North America,	Sample Description:	BSB-44 (4-6)	Chain of Custody:	147158
Client Project Name:	Inc. PSC - Detroit	Sample No: Sample Matrix:	12	Collect Date:	03/15/16
Client Project No:	NA	Sample Matrix:	Soil/Solid	Collect Time:	12:58
Sample Comments:	Soil results have been calculated and	reported on a dry weig	ht basis unless otherwise noted.		
Definitions:	O: Qualifier (see definitions at end of re	nort) NA: Not Applicable	e t · Parameter not included in N	ELAC Scope of Analysis	

efinitions: initions at end of report) NA: Not Applicable I Parameter not included in NELAC Scope of Analysis

Water (Moisture) Content Dried at 105 ± 5°C Method: ASTM D2216-10				Aliq Des	Matrix: So	oil/Solid				
Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prepa P. Date	ration P. Batch	A. Date	Analysis A. Batch	Init.
1. Percent Moisture (Water Content)	30		%	1	1.0	03/18/16	MC160318	03/21/16	MC160318	BMG

Volatile Organic Compounds (VOCs) by GC Method: EPA 5035A/EPA 8260B	C/MS, 5035			quot ID: scription:	72301-012A BSB-44 (4-6)	Matrix: S	oil/Solid		
				-	Prepa	aration	Α	nalysis	
Parameter(s)	Result	Q Units	Reporting Limit	Dilution	P. Date	P. Batch	A. Date	A. Batch	Init.
1. Acetone	U	µg/kợ	1000	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
2. Acrylonitrile	U	µg/kg	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
3. Benzene	230	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
4. Bromobenzene	U	µg/kg	72	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
5. Bromochloromethane	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
6. Bromodichloromethane	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
7. Bromoform	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
8. Bromomethane	U	µg/kg	290	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
9.t-Butanol	U	µg/kg	2500	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
10.2-Butanone	U	µg/kę	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
11. n-Butylbenzene	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
12. sec-Butylbenzene	U	µg/kę	58	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
13. tert-Butylbenzene	U	µg/kợ	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
14. Carbon Disulfide	U	µg/kę	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
15. Carbon Tetrachloride	U	µg/kợ	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
16. Chlorobenzene	U	µg/kę	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
17. Chloroethane	U	µg/kę	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
18. Chloroform	U	µg/kę	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
19. Chloromethane	U	µg/kę	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
‡ 20. Cyclohexane	330	µg/kę	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
21. Dibromochloromethane	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
‡ 22.1,2-Dibromo-3-chloropropane (SIM)	U	µg/ko	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
23. Dibromomethane	U	µg/kg	72	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
24.1,2-Dichlorobenzene	U	µg/ko	93	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
25.1,3-Dichlorobenzene	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
26.1,4-Dichlorobenzene	U	µg/ko	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
27. trans-1,4-Dichloro-2-butene (SIM)	U	µg/ko	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
28. Dichlorodifluoromethane	U	µg/ko	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
29.1,1-Dichloroethane	93	µg/ko	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
30.1,2-Dichloroethane	U	µg/kç	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR

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Sample Comments:	Soil results have been calculated an	nd reported on a dry weig	ht basis unless otherwise no	ted.	
Client Project No:	NA	Sample Matrix:	Soil/Solid	Collect Time:	12:58
Client Project Name:		Sample No:	12	Collect Date:	03/15/16
Client Identification:	Bureau Veritas North America, Inc.	Sample Description:	BSB-44 (4-6)	Chain of Custody:	147158

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

Volatile Organic Compounds (VOCs) by	/ GC/MS, 5035		Aliq	72301-012A	Matrix: S	latrix: Soil/Solid			
Method: EPA 5035A/EPA 8260B			Des	cription:	BSB-44 (4-6)				
					Prepa	ration	A	nalysis	
Parameter(s)	Result	Q Units	Reporting Limit	Dilution	P. Date	P. Batch	A. Date	A. Batch	Init
31.1,1-Dichloroethene	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DA
32. cis-1,2-Dichloroethene	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DA
33. trans-1,2-Dichloroethene	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DA
34.1,2-Dichloropropane	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DA
35. cis-1,3-Dichloropropene	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DA
36.trans-1,3-Dichloropropene	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DA
37. Diethyl Ether	U	µg/kg	200	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DA
\$ 38. Diisopropyl Ether	U	µg/kg	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DA
‡ 39.ETBE	U	µg/kg	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DA
40. Ethylbenzene	35000	µg/kg	360	10	03/22/16	VJ16C22A	03/22/16	VJ16C22A	CR
41. Ethylene Dibromide	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DA
42. Hexachloroe hane	U	µg/kg	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DA
43.2-Hexanone	U	µg/kg	720	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DA
44. Isopropylbenzene	530	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DA
45.4-Isopropyltoluene	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DA
46. Methylene Chloride	U	µg/kg	100	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DA
47.2-Methylnaphthalene	1300	µg/kg	360	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DA
48.4-Methyl-2-pentanone	U	µg/kg	360	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DA
49.MTBE	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DA
50. Naphthalene	4800	µg/kg	360	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DA
51. n-Propylbenzene	870	μg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DA
52. Styrene	U	μg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DA
\$ 53.TAME	U	µg/kg	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	
54.1,1,1,2-Tetrachloroethane	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DA
55.1,1,2,2-Tetrachloroethane	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	
56. Tetrachloroethene	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	
\$ 57. Tetrahydrofuran	U	µg/kg	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	
58. Toluene	2600	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	
59.1,2,3-Trichlorobenzene	U	µg/kg	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	
60.1,2,4-Trichlorobenzene	U	µg/kg	250	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	
61.1,1,1-Trichloroethane	140	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	
62.1,1,2-Trichloroethane	U	μg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	
63. Trichloroethene	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	
64. Trichlorofluoromethane	U	μg/kg	72	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	
65.1,2,3-Trichloropropane	U	µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	
‡ 66.1,2,3-Trimethylbenzene	U	μg/kg	120	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	
67.1,2,4-Trimethylbenzene	1600	µg/kg	140	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	

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Date:	

Client Identification:	Bureau Veritas North America,	Sample Description:	BSB-44 (4-6)	Chain of Custody:	147158
Client Project Name:	Inc. PSC - Detroit	Sample No: 12 Sample Matrix: Soil/Solid	Collect Date:	03/15/16	
Client Project No:	NA	Sample Matrix:	Soil/Solid	Collect Time:	12:58
Sample Comments:	Soil results have been calculated ar	nd reported on a dry weig	ht basis unless otherwise no	oted.	
Definitions:	O: Qualifier (see definitions at end of	roport) NA: Not Applicabl	a t: Parameter net included	in NELAC Scope of Analysis	

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

Volatile Organic Compounds (VOCs) by Method: EPA 5035A/EPA 8260B	y GC/MS, 5035			1	uot ID: cription:	72301-012A BSB-44 (4-6)	Matrix: S	oil/Solid		
						Prepa	ration	A	nalysis	
Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	P. Date	P. Batch	A. Date	A. Batch	Init.
68.1,3,5-Trimethylbenzene	1100		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
69. Vinyl Chloride	U		µg/kg	50	1.0	03/17/16	VJ16C17B	03/18/16	VJ16C17B	DAR
70.m&p-Xylene	75000		µg/kg	720	10	03/22/16	VJ16C22A	03/22/16	VJ16C22A	CRK
71.o-Xylene	3400		µg/kg	360	10	03/22/16	VJ16C22A	03/22/16	VJ16C22A	CRK
‡ 72. Xylenes	78000		µg/kg	1100	10	03/22/16	VJ16C22A	03/22/16	VJ16C22A	CRK

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## APPENDIX B

## NON-HAZARDOUS WASTE MANIFESTS

1. Generator's US EP	A ID No.	Manifest Doc	No.	2. Page 1	of			4
. Generator's Mailing Address:				A. Manife	st Number	1		
ETRO-CHEM PROCESSING Ger 21 LYCASTE SAI	nerator's Site Address	(If different than n	nailing):	w	MNA	8749	9894	
DETROIT, MICHIGAN 48214 . Generator's Phone- 13-824-5882	VIE				B. State (	Generator's	ID	
. Transporter 1 Company Name		A ID Number		C. State Tr	ransporter's II	D		
Farmer Underwood 145 . Transporter 2 Company Name		A ID Number	-	D. Transpo	orter's Phone	1		
. Designated Facility Name and Site Address	10. US E	PA ID Number		the second s	ransporter's II orter's Phone	D		
Voodland Meadows 900 Hannan Road Vayne Michigan 48184				G. State F H. State F	acility ID acility Phone	734-326-3	003	_
	La Sta	12.00	ontainers				3.	
1. Description of Waste Materials . Non-Hazardous Soil		No.	Type	13. Total Quantity	14. Unit Wt./Vol.	I. N	lisc. Comme	ents
		1	T	40	4			_
/M Profile # 121192/MI			1			1	11-11	
/M Profile #		1		-		1949		
VM Profile #		1						-
VM Profile # Additional Descriptions for Materials Listed Above Color – Blk/Brwn Physical State – Solid	Odor - No	K. Dispo	sal Location					
ILL TO: Petro-Chem	Contract of the second	Cell	-			Level		
5. Special Handling Instructions and Additional Information	025	95						
urchase Order #		CONTACT / PH 313-824-5882			_			-
6. GENERATOR'S CERTIFICATE: - Must Be Printed and	Signed and Date	d by the Ge	nerator					
hereby certify that the above-described materials are not h ccurately described, classified and packaged and are in pro	azardous wastes as de per condition for trans	efined by CFR F sportation acco	Part 261 or a prding to ap	any applicable plicable regul	e state law, ha lations.	ave been fu	lly and	
rinted Name ME	Signature "On be					Month	Day	Ye
7. Transporter 1 Acknowledgement of Receipt of Materials	1. 1. 0	inan	up			12	4	11
Printed Name	Signature	hh				Month	Day	Y
1 1 Ko Madere m	DE EVECT		-			12	7	1
8. Transporter 2 Acknowledgement of Receipt of Materials	1					Month	Day	Ye
	Signature							1
<ol> <li>Transporter 2 Acknowledgement of Receipt of Materials</li> <li>Printed Name</li> <li>Certificate of Final Treatment/Disposal</li> <li>certify, on behalf of the above listed treatment facility, that</li> </ol>	t to the best of my kno	wledge, the al	bove-descri	bed waste wa	as managed in	n compliant	e with al	1
8. Transporter 2 Acknowledgement of Receipt of Materials	t to the best of my kno		1 ~	_	as managed ir	n complianc	e with al	I

1. Gener	ator's US EPA ID No	o. M	anifest Doc N	lo.	2. Page 1 o	f					
Generator's Mailing Address: ETRO-CHEM PROCESSING	Generator	's Site Address (If a	lifferent than ma	iling):	A. Manifes	t Number	87498	895			
21 LYCASTE ETROIT, MICHIGAN 48214 . Generator's Phone- 13-824-5882	SAME				B. State Generator's ID						
Transporter 1 Company Name	6.	US EPA I	D Number			ansporter's II orter's Phone	)				
Transporter 2 Company Name	8.	US EPA I	D Number		E. State Tr	ansporter's II rter's Phone	)				
. Designated Facility Name and Site Address Voodland Meadows 1900 Hannan Road Vayne Michigan 48184	10	. US EPA	ID Number		G. State Fa		734-326-30	003			
1. Description of Waste Materials			the second se	ntainers	13. Total Quantity	14. Unit Wt./Vol.	I. Mi	sc. Commen	its		
n. Non-Hazardous Soil			No.	Туре	40	Y					
VM Profile # 121192MI		_				<u></u>		in and			
VM Profile #					125000	0.000	1				
VM Profile #			-	-							
l.											
WM Profile # . Additional Descriptions for Materials Liste Color – Blk/Brwn Physical State –		dor - No	K. Dispo	sal Location	n						
Color – Blk/Brwn Physical State – BILL TO: Petro-Chem	30110 0		Cell Grid				Level				
15. Special Handling Instructions and Addition	al Information	Das	96								
Purchase Order #		EMERGENCY C David Patton 3						-			
16. GENERATOR'S CERTIFICATE: - Must Be I hereby certify that the above-described mat	erials are not hazar	dous wastes as de	fined by CFR	Part 261 or	any applicab	le state law, l	nave been fu	lly and			
Printed Name M Kohnup	and are in proper o	Signature "On be	portation-acc	ording to a	pplicable regu	llations.	Month	Day	1		
17. Transporter 1 Acknowledgement of Recei	pt of Materials	Signature	P	1			Month	Day	Đ		
18. Transporter 2 Acknowledgement of Rece Printed Name	pt of Materials	Signature	40		_		Month	Day	Ŧ		
<ol> <li>Certificate of Final Treatment/Disposal</li> <li>certify, on behalf of the above listed treatment applicable laws, regulations, permits and licer</li> <li>Facility Owner or Operator: Certification</li> </ol>	nses on the dates li	sted above.	17			was managed	in complian	ce with a			
20. Facility Owner of Operator: Certification	or receipt of non-in	Signature	1		Wh		(Month)	( Day	T		

NON-HAZARDOUS MANIFEST	1. Generator's	US EPA ID No.	Manifest Doo	No.	2. Page 1	of			
3. Generator's Mailing Address: PETRO-CHEM PROCESSING		Generator's Site Addres	SS (if different than	mailing):		st Number	8749	9896	
421 LYCASTE DETROIT, MICHIGAN 48214 4. Generator's Phone- 313-824-5882		SAME				B. State C	Generator's	ID	
5. Transporter 1 Company Name Farmer Underwee	1 145	6. US I	EPA ID Number		and the second sec	ransporter's II orter's Phone	)	-	
7. Transporter 2 Company Name		8. US F	EPA ID Number		E. State T	ransporter's II	)		
<mark>9. Designated Facility Name and Site</mark> Woodland Meadows 5900 Hannan Road	Address	10. US	EPA ID Numbe	1	G. State F	acility ID acility Phone	734-326-3	3003	
Wayne Michigan 48184									
11. Description of Waste Materials			12. C No.	ontainers Type	13. Total Quantity	14. Unit Wt./Vol.	I. N	1isc. Comme	ents
a. Non-Hazardous Soil			1	T	40	Y			
WM Profile # 121192MI				117		1	1.2		
VM Profile #						17			
VM Profile #								-	-
VM Profile # . Additional Descriptions for Mater Color – Blk/Brwn Physical	ials Listed Above State – Solid	Odor - No	K. Dispo	sal Location		12			
BILL TO: Petro-Chem			Cell Grid				Level		
5. Special Handling Instructions and	Additional Inform	nation Da	597						
urchase Order #			Y CONTACT / PH						
6. GENERATOR'S CERTIFICATE: - Minimum of the second s	bed materials are	and Signed and Dat	ed by the Ge defined by CFR	enerator Part 261 or a	any applicable	e state law, ha	ive been fu	lly and	
ccurately described, classified and p	ackaged and are i	n proper condition for tra Signature_"On		ording to ap	plicable regu	lations.	Month	Day	Y
7. Transporter 1 Acknowledgement		terials	tick	up			12	4	1
Printed Name Ander	can	Signature	hh	-			Month 12	Day 4/	Y
8. Transporter 2 Acknowledgement	of Receipt of Mat	terials							
Printed Name		Signature					Month	Day	Y
<ol> <li>Certificate of Final Treatment/Discertify, on behalf of the above listed</li> </ol>	treatment facility		nowledge, the a	bove-descril	bed waste w	as managed ir	o complianc	e with al	н
	and licenses on th								_
pplicable laws, regulations, permits 20. Facility Owner or Operator: Certi	and the second se		ials covered by 1	his manifest	i.			-	

NON-HAZARDOUS MANIFEST	1. Generator's US	EPA ID No.	Manifest Doc I	No.	2. Page 1	of			
3. Generator's Mailing Address: PETRO-CHEM PROCESSING 421 LYCASTE DETROIT, MICHIGAN 48214		enerator's Site Address AME	(If different than m	ailing):		st Number MNA B. State (	8749 Generator's	9897	
4. Generator's Phone- 313-824-5882									
5. Transporter 1 Company Name			A ID Number		and the second se	ransporter's II orter's Phone	>		
7. Transporter 2 Company Name		8. US EP	A ID Number		And and a second se	ansporter's IE orter's Phone	)		-
9. Designated Facility Name and Site Woodland Meadows 5900 Hannan Road Wayne Michigan 48184	Address	10. US E	PA ID Number		G. State F H. State F	acility ID acility Phone	734-326-:	3003	
11. Description of Waste Materials	-		the second se	ntainers	13. Total	14. Unit	LN	lisc. Comme	ents
a. Non-Hazardous Soil			No.	Туре	Quantity	Wt./Vol.			
WM Profile # 121192MI b.	_								
WM Profile # c.			1			-		_	
WM Profile # d.			1						
WM Profile # J. Additional Descriptions for Mater Color – Blk/Brwn Physical	als Listed Above State – Solid	Odor - No	K. Dispos	al Location			12		22
BILL TO: Petro-Chem	state - Johu	Oddr - No	Cell				Level		
15. Special Handling Instructions and	Additional Informati	on	Grid						
Purchase Order #		EMERGENCY David Patton	CONTACT / PHO	ONE NO.:					-
16. GENERATOR'S CERTIFICATE: - ML I hereby certify that the above-describ accurately described, classified and pa	ed materials are not	d Signed and Date	d by the Ger	art 261 or a	any applicable plicable regul	state law, ha	ve been ful	ly and	
Printed Name		Signature "On be					Month	Day	Ye
17. Transporter 1 Acknowledgement	of Receipt of Materia								-
Printed Name		Signature					Month	Day	Ye
18. Transporter 2 Acknowledgement Printed Name	of Receipt of Materia	<u> </u>							1
		Signature					Month	Day	Y
19. Certificate of Final Treatment/Dis certify, on behalf of the above listed applicable laws, regulations, permits a	treatment facility, th nd licenses on the da	ates listed above.				is managed in	complianc	e with all	
<ol> <li>Facility Owner or Operator: Certil Printed Name</li> </ol>	ication of receipt of	non-hazardous material Signature	s covered by th	is manifest			Month	Dav	
A CONTRACT OF		Butter					wonth	Dаγ	Ye
White- TREATMENT, STORAGE, DISPO		Blue- GENERATO							-

3. Generator's Malling Address: 3. Generator's Site Address (r attrenet hum maling): SAME  A. Monifest Number  A. Monifest Number  B. State Generator's ID  B. State Generator's ID  C. State Generator's ID  B. State Generator's ID  C. State Transporter's ID  T. Transporter's ID  T. Transporter's ID  C. State Transporter's ID  C. Sta	NON-HAZARDOUS MANIFEST	1. Generator's	US EPA ID No.	Manifest Doc	No.	2. Page 1	of					
DETROIT, MICHIGAN 48214       B. State Generator's ID         4, Generator's Phone       E. State Transporter's ID         33.824-5882       D. Transporter's ID         7. Transporter 2 Company Name       B. US EPA ID Number         9. Designated Facility Name and Site Address       30.         Woodfand Meadows       30.         5000 Hannan Road       J. State Facility ID         Wayne Michigan 48184       J. State Facility ID         11. Description of Waste Materials       J. State Facility ID         a. Non-Hazardous Soil       J. Transporter's Phone         12. Centimer       J. State Facility ID         with rofile #       12. Centimer         14. T       T         WM rofile #       J. Transporter's Phone         14. T       T         WM rofile #       J. Transporter's Phone         15. Special Handling Instructions and Additional Information       Odor - No         Bill TO: Petro-Chem       Color - No         Bill TO: Petro-Chem       Special State - Soil Odor - No         Bill TO: Petro-Chem       Special State - Soil Odor - No         Bill TO: Petro-Chem       Special State - Soil Odor - No         Bill TO: Petro-Chem       Special Part 28.1 or any applicable state law, have been fully and presentent tharardiau state as defined by CFA Part 28.	PETRO-CHEM PROCESSING			(If different than n	nailing):			8749	898			
Factories       C. State Transporter's ID         7. Transporter 2 Company Name       B. US EPA ID Number         8. US EPA ID Number       E. State Transporter's Phone         9. Designated Facility Name and Site Address       10. US EPA ID Number         9. Designated Facility Name and Site Address       10. US EPA ID Number         9. Designated Facility Name and Site Address       10. US EPA ID Number         9. Designated Facility Name and Site Address       10. US EPA ID Number         9. Designated Facility Name and Site Address       10. US EPA ID Number         10. US EPA ID Number       G. State Facility ID         11. Description of Waste Materials       11. T         12. Not-Hizardous Soil       11. T         WM Profile #       11. T         4. WM Profile #       11. T         6.       11. T         4. WM Profile #       11. T         4. Additional Descriptions for Materials Listed Abave       11. T         Color - BIK/Brow       Physical State - Soild         0. Jack Street #       11. T         14. Additional Information       11. Special Inanding Instructions and Additional Information         15. Special Handling Instructions and Additional Information       11. Special Special State - Soild         15. Special Handling Instructions and Additional Information       11.	DETROIT, MICHIGAN 48214 4. Generator's Phone-		SAME			B. State Generator's ID						
	Farmer Underwood	ed 145	-			the second se	the second s	-				
Woodland Meadows       G. State Facility ID         5900 Hannan Road       H. State Facility ID         Wayne Michigan 48184       H. State Facility Phone 734-326-3003         11. Description of Waste Materials       12. Centilitient         a. Non-Hazardous Soil       1         WM Profile #       11. T         4. One Hazardous Soil       1         WM Profile #       1         5. State Facility ID       1         6. WM Profile #       1         6. State Facility ID       1         6. WM Profile #       1         7. Additional Descriptions for Materials Listed Above       0dor - No         BILL TO: Petro-Chem       1         15. Special Handling Instructions and Additional Information       0         15. Special Handling Instructions and Additional Signed and Dated by the Generator         Interdy certify that the above-described materials are not hazardous wastes as defined by CRP Part 2EL or any applicable state law, have been fully and accuratify described, disalfied and packaged and are in proper condition for framportation according to applicable state law, have been fully and accuratify described, disalfied and packaged and are in proper condition for framportation according to applicable state law, have been fully and accu		a Address				the second se	and the second se	D				
Mile Standardous Soil       No.       Type       Quantary       Miles Comments         a. Non-Hazardous Soil       I       T       40       Y       Vin/voil       I. Mice Comments         wm Profile #       1       T       40       Y       Vin/voil       I. Mice Comments         b.       I       T       40       Y       Vin/voil       I. Mice Comments         WM Profile #       I       I       T       40       Y       Vin/voil       I. Mice Comments         WM Profile #       I       I       I       I       III       IIII IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII	Woodland Meadows 5900 Hannan Road	e Address	10. 032	PA ID Number		100000000000000000000000000000000000000	and the second second	734-326-3	003	-		
a. Non-Hazardous Soil  WM Profile # 121192MI b.  WM Profile # 121192MI b.  WM Profile # 121192MI b.  WM Profile # 1 121192MI b.  K. Disposal Location Cell Grid Level David Patton 313-824-5882 16. GENERATOR'S CERTIFICATE: Must Be Printed and Signature To babalf of the Source and and are in proper condition for transportation according to applicable state law, have been fully and accurately described materials and entin proper condition for transportation according to applicable regulations. Printed Name Signature To babalf of the above described materials Printed Name Signature Month Dav David Patton 313-824-5882 18. GENERATOR'S CERTIFICATE: Signature Signature Month Dav David Patton 313-824-5882 18. GENERATOR'S CERTIFICATE: Signature Month Dav David Patton 313-824-5882 18. GENERATOR'S CERTIFICATE: Signature Signature Signature Signature To babalf of the above described materia	11. Description of Waste Materials							I. M	ísc. Comme	nts		
b.       WM Profile #       Image: Construction of the second of				1	T		Y					
WM Profile #       Image: Construction of the solution of the solutis the solution of				-	Same?							
c. WM Profile # d. WM Profile # d. WM Profile # d. K. Disposal Location Color - Bik/Brwn Physical State - Solid Odor - No BiLL TO: Petro-Chem K. Disposal Location Cell Grid Cell Grid Cell Cell Grid Cell Cell Cell Cell Cell Cell Cell Cel	b.											
c. WM Profile # d. WM Profile # d. WM Profile # d. K. Disposal Location Color - Bik/Brwn Physical State - Solid Odor - No BiLL TO: Petro-Chem K. Disposal Location Cell Grid Cell Grid Cell Cell Grid Cell Cell Cell Cell Cell Cell Cell Cel				-	-					_		
d.       WM Profile #         J. Additional Descriptions for Materials Listed Above Color - Bik/Brwn Physical State - Solid Odor - No       K. Disposal Location         BILL TO: Petro-Chem       Cell       Level         15. Special Handling Instructions and Additional Information       Q J S J G       Grid         Purchase Order #       EMERGENCY CONTACT / PHONE NO:: David Patton 313-824-5882       David Patton 313-824-5882         16. GENERATOR'S CERTIFICATE: - Must Be Printed and Signed and Dated by the Generator In hereby certify that the above-described materials are not hazardous wastes as defined by CFR Part 261 or any applicable state law, have been fully and accurately described, classified and packaged and are in proper condition for transportation according to applicable regulations.       Month Dav         Printed Name       Signature "On behalf of"       Month Dav         17. Transporter 1 Acknowledgement of Receipt of Materials       Signature       Month Dav         Printed Name       Signature       Signature       Month Dav         18. Transporter 2 Acknowledgement of Receipt of Materials       Signature       Month Dav       Dav         19. Certificate of Final Treatment/Disposal       Signature       Month Dav       Dav         19. Certificate of Final Treatment/Disposal       Icertify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits and licenses				-						-		
d.       WM Profile #         J. Additional Descriptions for Materials Listed Above Color - Bik/Brwn Physical State - Solid Odor - No       K. Disposal Location         BILL TO: Petro-Chem       Cell       Level         15. Special Handling Instructions and Additional Information       Q J S J G         Purchase Order #       David Patton 313-824-5882         16. GEINERATOR'S CERTIFICATE - Must Be Printed and Signed and Dated by the Generator         I hereby certify that the above-described materials are not hazardous wastes as defined by CFR Part 261 or any applicable state law, have been fully and accurately described, classified and packaged and are in proper condition for transportation according to applicable regulations.         Printed Name       Signature "On behalf of"         Printed Name       Signature         I a Transporter 1 Acknowledgement of Receipt of Materials         Printed Name       Signature         I a Certificate of Final Treatment/Disposal         1 certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits and licenses on the dates listed above.         20. Facility Owner or Operator: Certification of receipt of non-hazardous ma												
WM Profile #       Image: Color - Bik/Brwn       Physical State - Solid       Odor - No         BILL TO: Petro-Chem       K. Disposal Location       Cell       Level         15. Special Handling Instructions and Additional Information       Image: Color - Bik/Brwn       K. Disposal Location         Purchase Order #         EMERGENCY CONTACT / PHONE NO.: David Patton 313-824-5882         16. GENERATOR'S CERTIFICATE: - Must Be Printed and Signed and Dated by the Generator         Inereby certify that the above-described materials are not hazardous wastes as defined by CFR Part 261 or any applicable state law, have been fully and accurately described, classified and packaged and are in proper condition for transportation according to applicable regulations.         Printed Name       Signature "On behalf of"       Month       David         17. Transporter 1 Acknowledgement of Receipt of Materials       Signature       Month       David         Printed Name         Signature         Month       David         Printed Name         Signature         Month       David         Printed Name       Signature         Month       David         Printed Name       Signature       Month       David	and the second se			100		-	1.000	1000				
J. Additional Descriptions for Materials Listed Above Color – Bik/Brwn       Physical State – Solid       Odor - No         BILL TO: Petro-Chem       Cell       Level         15. Special Handling Instructions and Additional Information       O 2 5 9 9         Purchase Order #       EMERGENCY CONTACT / PHONE NO.: David Patton 313-824-5882         16. GENERATOR'S CERTIFICATE: - Must Be Printed and Signed and Dated by the Generator         I hereby certify that the above-described materials are not hazardous wastes as defined by CFR Part 261 or any applicable state law, have been fully and accurately described, classified and packaged and are in proper condition for transportation according to applicable regulations.         Printed Name       Signature "On behalf of"         Printed Name       Signature         Printed Name       Signature <td></td>												
Shit TO: Period-chem       Grid         If is Special Handling Instructions and Additional Information       If is Special Handling Instructions and Additional Information         Purchase Order #       EMERGENCY CONTACT / PHONE NO.:: David Patton 313-824-5882         16. GENERATOR'S CERTIFICATE: - Must Be Printed and Signed and Dated by the Generator         I hereby certify that the above-described materials are not hazardous wastes as defined by CFR Part 261 or any applicable state law, have been fully and accurately described, classified and packaged and are in proper condition for transportation according to applicable regulations.         Printed Name       Signature "On behalf of"         Printed Name       Signature         Month       Dav         17. Transporter 1 Acknowledgement of Receipt of Materials         Printed Name       Signature         Month       Dav         18. Transporter 2 Acknowledgement of Receipt of Materials         Printed Name       Signature         Month       Dav         19. Certificate of Final Treatment/Disposal         1 certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits and licenses on the dates listed above.         20. Facility Owner or Operator: Certification of receipt of non-hazardous materials covered by this manifest.	J. Additional Descriptions for Mate			K. Dispo	sal Location	1						
15. Special Handling Instructions and Additional Information       Image: Control of the above described in the above described materials are not hazardous wastes as defined by CFR Part 261 or any applicable state law, have been fully and accurately described, classified and packaged and are in proper condition for transportation according to applicable state law, have been fully and accurately described, classified and packaged and are in proper condition for transportation according to applicable state law, have been fully and accurately described, classified and packaged and are in proper condition for transportation according to applicable regulations.         Printed Name       Signature "On behalf of"       Month       Dav         17. Transporter 1 Acknowledgement of Receipt of Materials       Signature       Month       Dav         18. Transporter 2 Acknowledgement of Receipt of Materials       Signature       Month       Dav         19. Certificate of Final Treatment/Disposal       Signature       Month       Dav         19. Certificate of Final Treatment/Disposal       I certify, on behalf of the above. Itsed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits and licenses on the dates listed above.       20. Facility Owner or Operator: Certification of receipt of non-hazardous materials covered by this manifest.	BILL TO: Petro-Chem							Level	1.			
Purchase Order #       EMERGENCY CONTACT / PHONE NO.: David Patton 313-824-5882         16. GENERATOR'S CERTIFICATE: - Must Be Printed and Signed and Dated by the Generator I hereby certify that the above-described materials are not hazardous wastes as defined by CFR Part 261 or any applicable state law, have been fully and accurately described, classified and packaged and are in proper condition for transportation according to applicable regulations.         Printed Name       Month       Dav         17. Transporter 1 Acknowledgement of Receipt of Materials       Signature "On behalf of"       Month       Dav         18. Transporter 2 Acknowledgement of Receipt of Materials       Signature       Month       Dav       12       5         19. Certificate of Final Treatment/Disposal       I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits and licenses on the dates listed above.       20. Facility Owner or Operator: Certification of receipt of non-hazardous materials covered by this manifest.       I	15. Special Handling Instructions an	d Additional Infor	mation 025							-		
Principal Order #       David Patton 313-824-5882         16. GENERATOR'S CERTIFICATE: - Must Be Printed and Signed and Dated by the Generator         I hereby certify that the above-described materials are not hazardous wastes as defined by CFR Part 261 or any applicable state law, have been fully and accurately described, classified and packaged and are in proper condition for transportation according to applicable regulations.         Printed Name       Signature "On behalf of"       Month       David         17. Transporter 1 Acknowledgement of Receipt of Materials       Signature       Month       David         18. Transporter 2 Acknowledgement of Receipt of Materials       Signature       Month       David         19. Certificate of Final Treatment/Disposal       Signature facility, that to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits and licenses on the dates listed above.         20. Facility Owner or Operator: Certification of receipt of non-hazardous materials covered by this manifest.       Leader State Sta												
I hereby certify that the above-described materials are not hazardous wastes as defined by CFR Part 261 or any applicable state law, have been fully and accurately described, classified and packaged and are in proper condition for transportation according to applicable regulations.         Printed Name       Signature "On behalf of"       Month       Day         17. Transporter 1 Acknowledgement of Receipt of Materials       Signature       Month       Day         18. Transporter 2 Acknowledgement of Receipt of Materials       Signature       Month       Day         18. Transporter 2 Acknowledgement of Receipt of Materials       Signature       Month       Day         19. Certificate of Final Treatment/Disposal       Signature to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits and licenses on the dates listed above.         20. Facility Owner or Operator: Certification of receipt of non-hazardous materials covered by this manifest.       Lerificate	Purchase Order #				ONE NO.:							
Printed Name       Signature "On behalf of"       Month       Day         17. Transporter 1 Acknowledgement of Receipt of Materials       Image: Constraint of the constrated consthe constraint of the constrated constraint of	I hereby certify that the above-descr	ribed materials are	e not hazardous wastes as de	efined by CFR F	Part 261 or	any applicabl	e state law, ha	ave been ful	lly and			
Mail       Mail       Mail         17. Transporter 1 Acknowledgement of Receipt of Materials       Signature       Month       Day         Printed Name       Signature       Month       Day         18. Transporter 2 Acknowledgement of Receipt of Materials       Printed Name       Signature       Month       Day         18. Transporter 2 Acknowledgement of Receipt of Materials       Printed Name       Signature       Month       Day         19. Certificate of Final Treatment/Disposal       I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits and licenses on the dates listed above.       20. Facility Owner or Operator: Certification of receipt of non-hazardous materials covered by this manifest.		poenageo ano are			nung to ap	plicable regu	ations.	Month	Day	Yea		
Printed Name       Signature       Month       Day         18. Transporter 2 Acknowledgement of Receipt of Materials       12       3         Printed Name       Signature       12       3         19. Certificate of Final Treatment/Disposal       Signature       Month       Day         19. Certificate of Final Treatment/Disposal       I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits and licenses on the dates listed above.       20. Facility Owner or Operator: Certification of receipt of non-hazardous materials covered by this manifest.	11 toplas	10	1	M. I	cola	.0	_	12	5	19		
18. Transporter 2 Acknowledgement of Receipt of Materials         Printed Name       Signature         19. Certificate of Final Treatment/Disposal         I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits and licenses on the dates listed above.         20. Facility Owner or Operator: Certification of receipt of non-hazardous materials covered by this manifest.	- FI FUEL	it of Receipt of Ma		. Al				Month	Day	Ye		
Printed Name       Signature       Month       Day         19. Certificate of Final Treatment/Disposal       I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits and licenses on the dates listed above.       I certification of receipt of non-hazardous materials covered by this manifest.			1015	. Unh	~		_	12	5	1		
19. Certificate of Final Treatment/Disposal         I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits and licenses on the dates listed above.         20. Facility Owner or Operator: Certification of receipt of non-hazardous materials covered by this manifest.	Printed Name Ander	CONTRACTOR OF A DOMESTIC AND A DOMESTIC AND A DOMESTIC AND A DOMESTICA AND A DOMES			-			Month	Dav	Ye		
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		1. Generator's US E	PA ID No. N	anifest Doc	No.	2. Page 1	of				
B. State Generator's ID B. State Generator's ID B. State Generator's ID B. State Generator's ID C. State Transporter's ID Transporter 1 Company Name C. State Transporter's ID Transporter's Plone C. State Transporter's Plone C. State Transporter's D Transporter's Plone C. State Transporter's Plone	PETRO-CHEM PROCESSING	11.20		different than n	nailing):			8749	9899		
FALL       C. State Transporter's ID         2. Transporter's Company Name       B.       US EPA ID Number         2. Designated Facility Name and Site Address       D. Us EPA ID Number       E. State Transporter's Phone         3. Designated Facility Name and Site Address       10.       US EPA ID Number       G. State Facility ID         4. Designated Facility Name and Site Address       10.       US EPA ID Number       G. State Facility ID         5900 Hannan Road       State Transporter's ID       F. Transporter's ID       F. Transporter's ID         4. Description of Waste Materials       10.       US EPA ID Number       G. State Facility ID         5900 Hannan Road       11.       T       40.       F. State Facility ID         500 Hannan Road       11.       T       40.       F. State Facility ID         500 Hannan Road       11.       T       40.       F. State Facility ID         500 Hannan Road       11.       T       40.       F. State Facility ID         500 Hannan Road       11.       T       40.       F. State Facility ID         500 Hannan Road       11.       T       40.       F. State Facility ID         6.       12.       11.       T       40.       F. State Facility ID         6.       12. </th <th>DETROIT, MICHIGAN 48214 . Generator's Phone-</th> <th>34</th> <th></th> <th></th> <th></th> <th></th> <th>B. State (</th> <th>Generator's</th> <th>ID</th> <th></th>	DETROIT, MICHIGAN 48214 . Generator's Phone-	34					B. State (	Generator's	ID		
Designated Facility Name and Site Address     Moodland Meadows     Sold Naman Road     Mayne Michigan 48184     10. US EPA ID Number     G. State Facility Den     G. State Facility Phone     G. State     Goveent Physical State - Sold     Goveent	FALL			D Number	C. State Transporter's ID D. Transporter's Phone						
Woodland Meadows       G. State Facility ID         1900 Hannan Road       H. State Facility ID         Wayne Michigan 48184       H. State Facility ID         1. Description of Waste Materials       12. Centility ID         w. Non-Hazardous Soil       I         VM Profile #       12.1192MI         -       I       I         VM Profile #       12.1192MI         -       I       I         VM Profile #       I       I         -       I       I       I         VM Profile #       I       I       I         -       I       I       I       III. Intercent Anterials Usted Above         Color - No       III. To: Petro-Chem       K. Disposal Location       IIII. Intercent Anterials Usted Above         Color - No       III. To: Petro-Chem       K. Disposal Location       IIII. Intercent Anterials Usted Above         Sopcial Handling Instructions and Additional Information       D GGGGG       IIII. Intercent Anterials Usted Above         G. GENERATOR'S CERTIFICATE: - Must Be Printed and Signed and Data In prospect condition for transportation according to applicable state law, have been fully and ccurately described, classified and packaged and are in proper condition for transportation according to applicable state law, have been fully and ccurately described, classified and packaged and are in propare condition				D Number		the second se	the second s	)			
A. Description of water waterials       No.       Type       Quantery       Wr. Avail       L. Mic. Comments         Non-Hazardous Soil       I       T       40       Y       Interview       Mic. Comments         VM Profile #       1       T       40       Y       Interview       Mic. Comments         VM Profile #       Interview       Int	Voodland Meadows 900 Hannan Road	ddress	10. US EPA	ID Number		- VALO 40.00 201-20	12.50 V0.1.00 July	734-326-3	003		
	1. Description of Waste Materials			and the second se				I. M	isc. Comme	nts	
IM Profile #       Image: Second				1	T		Y				
/M Profile #       Image: Constraint of the state of the					1.2.2			1	_		
IM Profile #       Additional Descriptions for Materials Listed Above         Additional Descriptions for Materials Listed Above       Odor - No         Soft - Bik/Brwn       Physical State - Solid       Odor - No         ILL TO: Petro-Chem       Cell       Level         5. Special Handling Instructions and Additional Information       D 26000         archase Order #       EMERGENCY CONTACT / PHONE NO.: David Patton 313-824-5882         5. GENERATOR'S CERTIFICATE: - Must Be Printed and Signed and Dated by the Generator nereby certify that the above-described materials are not hazardous wastes as defined by CFR Part 261 or any applicable state law, have been fully and ccurately described, classified and packaged and are in proper condition for transportation according to applicable regulations.         Tinted Name       Signature "On behalf of"         A. Transporter 1 Acknowledgement of Receipt of Materials         Printed Name       Signature         Month       Day         A. Transporter 2 Acknowledgement of Receipt of Materials         Printed Name       Signature         Month       Day         A. Certificate of Final Treatment/Disposal         Partify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all plicable laws, regulations, permits and licenses on the dates listed above.         A. Certificate of Final Treatment/Disposal										10	
VM Profile #       K. Disposal Location         Additional Descriptions for Materials Listed Above Golor - Bik/Brwn Physical State - Solid Odor - No       K. Disposal Location         ILL TO: Petro-Chem       Cell       Level         5. Special Handling Instructions and Additional Information       D @ @ @ @ @         5. Special Handling Instructions and Additional Information       D @ @ @ @ @ @         curchase Order #       EMERGENCY CONTACT / PHONE NO.: David Patton 313-824-5882         6. GENERATOR'S CERTIFICATE: - Must Be Printed and Signed and Dated by the Generator hereby certify that the above-described materials are not hazardous wastes as defined by CFR Part 261 or any applicable state law, have been fully and curcately described, classified and packaged and are in proper condition for transportation according to applicable state law, have been fully and curcately described, classified and packaged and are in proper condition for transportation according to applicable regulations.         7. Transporter 1 Acknowledgement of Receipt of Materials         Printed Name       Signature         Month       David         8. Transporter 2 Acknowledgement of Receipt of Materials         Printed Name       Signature         Month       David         9. Certificate of Final Treatment/Disposal         2. Facility Owner or Operator: Certification of receipt of non-hazardous materials covered by this manifest.			an and and the						1		
Color - Blk/Brwn       Physical State – Solid       Odor - No         IILL TO: Petro-Chem       Cell       Level         5. Special Handling Instructions and Additional Information       D 26600         urchase Order #       EMERGENCY CONTACT / PHONE NO.: David Patton 313-824-5882         6. GENERATOR'S CERTIFICATE: - Must Be Printed and Signed and Dated by the Generator hereby certify that the above-described materials are not hazardous wastes as defined by CFR Part 261 or any applicable state law, have been fully and ccurately described, classified and packaged and are in proper condition for transportation according to applicable regulations.         7. Transporter 1 Acknowledgement of Receipt of Materials       Signature "On behalf of"         Printed Name       Signature         0. Certificate of Final Treatment/Disposal certify, on behalf of the above-listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all pplicable laws, regulations, permits and licenses on the dates listed above.         0. Facility Owner or Operator: Certification of receipt of non-hazardous materials covered by this manifest.					1	1					
Intro. Petrochem       Grid         Grid       Grid         S. Special Handling Instructions and Additional Information       D @ @ @ @ @         David Patton 313-824-5882       David Patton 313-824-5882         G. GENERATOR'S CERTIFICATE: - Must Be Printed and Signed and Dated by the Generator         hereby certify that the above-described materials are not hazardous wastes as defined by CFR Part 261 or any applicable state law, have been fully and ccurately described, classified and packaged and are in proper condition for transportation according to applicable regulations.         rinted Name       Signature "On behalf of"         Month       David         7. Transporter 1 Acknowledgement of Receipt of Materials       Signature         Printed Name       Signature         Month       David         8. Transporter 2 Acknowledgement of Receipt of Materials         Printed Name       Signature         Month       David         9. Certificate of Final Treatment/Disposal         certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all opplicable laws, regulations, permits and licenses on the dates listed above.         0. Facility Owner or Operator: Certification of receipt of non-hazardous materials covered by this manifest.	Color – Blk/Brwn Physical Sta		Odor - No		sal Location			lavel			
urchase Order #       EMERGENCY CONTACT / PHONE NO.: David Patton 313-824-5882         6. GENERATOR'S CERTIFICATE: - Must Be Printed and Signed and Dated by the Generator hereby certify that the above-described materials are not hazardous wastes as defined by CFR Part 261 or any applicable state law, have been fully and curcartely described, classified and packaged and are in proper condition for transportation according to applicable regulations.         rinted Name       Signature "On behalf of"       Month       Dav         7. Transporter 1 Acknowledgement of Receipt of Materials         Printed Name       Signature       Month       Dav         8. Transporter 2 Acknowledgement of Receipt of Materials         Printed Name       Signature       Month       Dav         9. Certificate of Final Treatment/Disposal         certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all pplicable laws, regulations, permits and licenses on the dates listed above.         0. Facility Owner or Operator:       Certification of receipt of non-hazardous materials covered by this manifest.	A Data and the second second second second	O: Petro-Chem						Level		-	
Bail Patton 313-824-5882         6. GENERATOR'S CERTIFICATE: - Must Be Printed and Signed and Dated by the Generator         hereby certify that the above-described materials are not hazardous wastes as defined by CFR Part 261 or any applicable state law, have been fully and ccurately described, classified and packaged and are in proper condition for transportation according to applicable regulations.         rinted Name       Signature "On behalf of"         Month       David         7. Transporter 1 Acknowledgement of Receipt of Materials       Signature         Printed Name       Signature         Month       David         8. Transporter 2 Acknowledgement of Receipt of Materials       Signature         Printed Name       Signature         Month       David         9. Certificate of Final Treatment/Disposal       Signature to the best of my knowledge, the above-described waste was managed in compliance with all opplicable laws, regulations, permits and licenses on the dates listed above.         0. Facility Owner or Operator: Certification of receipt of non-hazardous materials covered by this manifest.       Month	5. Special Handling Instructions and Ad	iditional Informatio									
hereby certify that the above-described materials are not hazardous wastes as defined by CFR Part 261 or any applicable state law, have been fully and ccurately described, classified and packaged and are in proper condition for transportation according to applicable regulations.         rinted Name       Signature "On behalf of"       Month       Day         7. Transporter 1 Acknowledgement of Receipt of Materials         Printed Name       Signature       Month       Day         8. Transporter 2 Acknowledgement of Receipt of Materials         Printed Name       Signature       Month       Day         9. Certificate of Final Treatment/Disposal       Signature       Month       Day         9. Certificate of Final Treatment/Disposal       Signature to the best of my knowledge, the above-described waste was managed in compliance with all pplicable laws, regulations, permits and licenses on the dates listed above.       Month       Day         0. Facility Owner or Operator:       Certification of receipt of non-hazardous materials covered by this manifest.       Month       Month	urchase Order #			Sector 2010 (1997)	ONE NO.:						
Signature "On behalf of"       Month       Day         7. Transporter 1 Acknowledgement of Receipt of Materials       Month       Day         Printed Name       Month       Day         8. Transporter 2 Acknowledgement of Receipt of Materials       Month       Day         Printed Name       Signature       Month       Day         8. Transporter 2 Acknowledgement of Receipt of Materials       Signature       Month       Day         9. Certificate of Final Treatment/Disposal       Signature       Month       Day         9. Certificate of Final Treatment/Disposal       Certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all opplicable laws, regulations, permits and licenses on the dates listed above.       O. Facility Owner or Operator: Certification of receipt of non-hazardous materials covered by this manifest.       Month       Month	hereby certify that the above-described	d materials are not	hazardous wastes as defir	ed by CFR P	art 261 or a	ny applicable plicable regul	e state law, ha ations.	ive been ful	ly and		
Printed Name       Month       Day         8. Transporter 2 Acknowledgement of Receipt of Materials       Image: Construction of the second se	rinted Name	)	M.	If of"	hur	2		Month 12	Day	1	
Printed Name       Signature       Month       Day         9. Certificate of Final Treatment/Disposal       Image: Certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all pplicable laws, regulations, permits and licenses on the dates listed above.       Image: Certification of receipt of non-hazardous materials covered by this manifest.         0. Facility Owner or Operator: Certification of receipt of non-hazardous materials covered by this manifest.       Image: Certification of the certification of th	M. Mohneye	Receipt of Material	Cignostium	100		Month Day					
2. Certificate of Final Treatment/Disposal     certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all     opplicable laws, regulations, permits and licenses on the dates listed above.     O. Facility Owner or Operator: Certification of receipt of non-hazardous materials covered by this manifest.	M. Hanneys 7. Transporter 1 Acknowledgement of	Las 7-150						10	)	11	
certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all oplicable laws, regulations, permits and licenses on the dates listed above. D. Facility Owner or Operator: Certification of receipt of non-hazardous materials covered by this manifest.	M. Hanhnap 7. Transporter 1 Acknowledgement of Printed Name	Lan		1						T .	
	7. Transporter 1 Acknowledgement of Printed Name Frem K.M. 3. Transporter 2 Acknowledgement of	Lan	s	~~				Month	Day	-	
Printed Name Signature Month Qay	M. Ma Muty 7. Transporter 1 Acknowledgement of Printed Name 8. Transporter 2 Acknowledgement of Printed Name 9. Certificate of Final Treatment/Dispo certify, on behalf of the above listed tre pplicable laws, regulations, permits and	Receipt of Material sal satment facility, tha l licenses on the da	IS Signature It to the best of my knowl tes listed above.				as managed in				

	N-HAZ		lanifest Doc		2. Page 1				-
3. Generator's Mailing Address:		_					-	1	
PETRO-CHEM PROCESSING	Generator's S	ite Address (If	different than m	ailing):		st Number MNA	874	9900	
421 LYCASTE	SAME						Generator'	s ID	
DETROIT, MICHIGAN 48214 4. Generator's Phone-									
313-824-5882 5. Transporter 1 Company Name	6.		D Number		-				-
	0.	US EFAI	o wumber		and the second se	ansporter's			
7. Transporter 2 Company Name	8.	US EPA	D Number		D. Transpo	orter's Phone	1		
					the second	ansporter's l			
9. Designated Facility Name and Site Address	10.	US EPA	ID Number		F. Transpo	orter's Phone		-	-
Woodland Meadows 5900 Hannan Road					G. State F	LIGHT OF 2 SA LINES.	794 795	2000	
Wayne Michigan 48184					H. State F	acility Phone	/34-326-	3003	-
41 December - 411			12.00	ntainers	13. Total	14. Unit	1		
11. Description of Waste Materials a. Non-Hazardous Soil			No.	Туре	Quantity	Wt./Vol.	1. 1	Misc. Comme	nts
			1	T	40	Y			
WM Profile # 121192MI				1 39- 1					13
b									
WM Profile #			-				-	_	
c.									
WM Profile #			-	-			-		
d.						ale and a second			
WM Profile # J. Additional Descriptions for Materials Listed Al	oove		K. Dispos	al Location	1	9			
Color – Blk/Brwn Physical State – Sol	d Odor -	No	Cell				Linual		
BILL TO: Petro-Chem			Grid				Level	-	
15. Special Handling Instructions and Additional Ir	nformation	260	1						
Purchase Order #		MERGENCY CC avid Patton 31		ONE NO.:					
16. GENERATOR'S CERTIFICATE: - Must Be Prin	and the second second second			nerator					-
I hereby certify that the above-described materials accurately described, classified and packaged and	are not hazardous v	wastes as definition for transpo	ned by CFR P	art 261 or a	iny applicable	state law, h	ave been fu	ally and	
Printed Name		ature "On beha		rung to ap	,	auons.	Month	Day	Year
17. Transporter 1 Acknowledgement of Receipt of	Materials	M.	Zial	up			12	5	19
Printed Name	Signa		01				Month	Day	Year
18. Transporter 2 Acknowledgement of Receipt of	Materials	36 6	Lee-	_			12	15	10
Printed Name	Signa	ature					Month	Day	Year
19. Certificate of Final Treatment/Disposal									
	cility, that to the be-	st of my know	ledge, the ab	ove-describ	ped waste wa	as managed i	n complian	ce with all	
certify, on behalf of the above listed treatment fa	on the dates listed al	bove.							
<ol> <li>certify, on behalf of the above listed treatment fa applicable laws, regulations, permits and licenses of 20. Facility Owner or Operator: Certification of re Printed Name</li> </ol>	on the dates listed al	bove. ous materials c	overed by th	is manifest					

	1. Generator's US	5 EPA ID No.	Manifest Doo	: No.	2. Page 1	of					
	3. Generator's Mailing Address: PETRO-CHEM PROCESSING	Generator's Site Addr	ess (If different than	mailing):		st Number MNA	8749	901			
	421 LYCASTE DETROIT, MICHIGAN 48214 4. Generator's Phone- 313-824-5882	SAME					Generator's	ID			
-	5. Transporter 1 Company Name Farmer Underwood 145		EPA ID Number		the second se	ansporter's I	intelligi intelligi intelligi				
	7. Transporter 2 Company Name		EPA ID Number		E. State Tr	orter's Phone ansporter's I orter's Phone	D		-		
	9. Designated Facility Name and Site Address Woodland Meadows 5900 Hannan Road Wayne Michigan 48184	10. U	IS EPA ID Numbe	r	G. State Fa			003			
	11. Description of Waste Materials	-	the second se	Containers	13. Total	14. Unit	LN	lisc. Comme	nts		
-	a. Non-Hazardous Soil		No.	TR	Quantity 4/0	Wt./Vol.					
	WM Profile # 121192MI			1000		1	1.1.1.1				
	b. WM Profile #				-			_			
	WM Profile # d.										
	WM Profile # J. Additional Descriptions for Materials Listed Above Color – Blk/Brwn Physical State – Solid	Odor - No	K. Dispo	osal Location			Level				
	BILL TO: Petro-Chem 15. Special Handling Instructions and Additional Informa	ation 7	Grid	2					-		
				-							
	Purchase Order #		ICY CONTACT / PI ton 313-824-588;								
	16. GENERATOR'S CERTIFICATE: - Must Be Printed a I hereby certify that the above-described materials are n accurately described, classified and packaged and are in	ot hazardous wastes a	s defined by CFR	Part 261 or	any applicable	state law, h	ave been fu	lly and			
	Printed Name M. Frohnup	Signature "O		ich	up		Month 72	Day.	Yea		
	17. Transporter 1 Acknowledgement of Receipt of Mate Printed Name Andlerson	rials Signature	h ghh				Month	Day	Yea 7 C		
	<ol> <li>Transporter 2 Acknowledgement of Receipt of Mate Printed Name</li> </ol>	rials Signature					Month	Day	Yea		
		and a rest									
	<ol> <li>Certificate of Final Treatment/Disposal</li> <li>certify, on behalf of the above listed treatment facility, applicable laws, regulations, permits and licenses on the</li> </ol>	dates listed above.		EN-	TO ANY A	as managed i	n compliand	e with al:	1		
	20. Facility Owner or Operator: Certification of receipt of Printed Name	of non-hazardous mate Signature	erials covered by	this manifes	ti		Month	0	Yea		
		Signature	4 15		I ARA I		Month	Day	rea		

NON-HAZARDOUS MANIFEST	r's US EPA ID No.	Manifest Doc		2. Page 1				
3. Generator's Mailing Address: PETRO-CHEM PROCESSING	Generator's Site Addr	ess (If different than m	nailing):	Concerning State	st Number MNA	8749	902	
421 LYCASTE DETROIT, MICHIGAN 48214 4. Generator's Phone- 813-824-5882	SAME				1400 2010	Generator's		
5. Transporter 1 Company Name	6. US	EPA ID Number					10.15	
The may law have want				the second se	ransporter's II orter's Phone		_	
7. Transporter 2 Company Name	8. US	EPA ID Number				4.2.2	1.	
				the second se	ransporter's II orter's Phone	D		
9. Designated Facility Name and Site Address	10. U	S EPA ID Number	-	r. transpo	onter s Phone		-	
Woodland Meadows	100			G. State F	AT A REAL POINT OF A REAL POINT OF A			
5900 Hannan Road Wayne Michigan 48184				H. State F	acility Phone	734-326-3	003	
wayne wichigan 40104				1				
11. Description of Waste Materials		the second se	ntainers	13. Total	14. Unit	L.M	lisc. Comme	ents
a. Non-Hazardous Soil		No.	Туре	Quantity	Wt./Vol.	0.00		
			T	40	Y			
WM Profile # 121192MI			1.					
a. Arrest								
And the second s							1	
NM Profile #							1444	
WM Profile #		- 200	1	1.	150.00	1		
d.			1					
WM Profile #								_
Additional Descriptions for Materials Listed Abo	ove	K. Dispos	sal Location					
Color – Blk/Brwn Physical State – Solid	Odor - No						_	
BILL TO: Petro-Chem		Cell Grid				Level		-
15. Special Handling Instructions and Additional Inf	ormation 7	2603					-	
	D	4.602						
Purchase Order #	EMERGEN	CY CONTACT / PH	ONE NO.:					
16. GENERATOR'S CERTIFICATE: - Must Be Print	and the second se	ton 313-824-5882					_	
hereby certify that the above-described materials				any applicable	e state law, ha	ave been ful	lly and	
accurately described, classified and packaged and a	re in proper condition for tr	ansportation acco	rding to ap	plicable regul	ations.		10.00	
Printed Name M Frahmin	Signature "O	n behalf of"	nh.	1		Month	Day	Ye
17. Transporter 1 Acknowledgement of Receipt of M	Materials	ni caa	man	1		1 ) 4 1	)	14
Printed Name	Signature	0110	1			Month	Day	Ye
18. Transporter 2 Acknowledgement of Receipt of N	Antorials	1200	er			12	5	1/
Printed Name	Signature					Month	Day	Ye
	- Contraction						1	
19. Certificate of Final Treatment/Disposal					-	-		-
certify, on behalf of the above listed treatment fac applicable laws, regulations, permits and licenses or	ility, that to the best of my the dates listed above	knowledge, the at	oove-descri	bed waste wa	as managed ir	n complianc	e with al	li -
and a second sec		the state of the state of the						
20. Facility Owner or Operator: Certification of reco	eipt of non-hazardous mate	rials covered by the	his manifes	t.	1 0			1

offer the real fills have

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NON-HAZARDOUS MANIFEST	1. Generator's US I	EPA ID No.	Manifest Doc N	No.	2. Page 1	of			
3. Generator's Mailing Address: PETRO-CHEM PROCESSING		enerator's Site Addre	SS (If different than ma	ailing):		est Number /MNA	874	9903	
421 LYCASTE DETROIT, MICHIGAN 48214 1. Generator's Phone- 113-824-5882	S	AME				B. State (	Generator's	ID	
5. Transporter 1 Company Name		6. US I	PA ID Number			Fransporter's II porter's Phone			
. Transporter 2 Company Name		8. US I	PA ID Number		E. State T	Fransporter's II			
. Designated Facility Name and Site Voodland Meadows	Address	10. US	EPA ID Number			orter's Phone			
900 Hannan Road Vayne Michigan 48184			_			Facility ID Facility Phone	734-326-3	3003	-
1. Description of Waste Materials		12000	12. Cor No.	tainers Type	13. Total Quantity	14. Unit Wt./Vol.	L.N	Aisc. Comme	ents
. Non-Hazardous Soil			NO.	1766	U(U	VIS			
M Profile # 121192MI	and the second								
/M Profile #									
e .		1							
/M Profile #		16					No. Contract		
/M Profile # Additional Descriptions for Mater	ials listed Above		K Dispos	al Location					-
	State – Solid	Odor - No	Cell				Level		_
5. Special Handling Instructions and	Additional Informati	on D24	Grid 64						
urchase Order #		EMERGENC	Y CONTACT / PHO	ONE NO.:					
6. GENERATOR'S CERTIFICATE: - MU		d Signed and Dat							_
hereby certify that the above-descril ccurately described, classified and pa rinted Name	oed materials are not ackaged and are in pr	oper condition for tra	nsportation accor	art 261 or ding to ap	any applicab oplicable regu	le state law, ha Ilations.			_
7. Transporter 1 Acknowledgement	0 of Receipt of Materia	Signature "On	M L	she	-p		Month 12	Day	j
Printed Name	len #15	0 Signature		/			Month 19	Day 5	1
<ol> <li>Transporter 2 Acknowledgement</li> <li>Printed Name</li> </ol>	of Receipt of Materia	als Signature				-	Month	Day	1
9. Certificate of Final Treatment/Dis						*			
artify on hehalf of the above listed	treatment facility, th	at to the best of my k	nowledge, the abo	ove-descri	ibed waste w	vas managed in	complianc	e with all	ŀ
oplicable laws, regulations, permits a D. Facility Owner or Operator: Certi			ale environd hurde	-		A			

NON-HAZARDOUS MANIFEST	1. Generator's U	S EPA ID No.	Manifest Doc	No.	2. Page 1	of			
3. Generator's Mailing Address: PETRO-CHEM PROCESSING 421 LYCASTE		Generator's Site Address SAME	(If different than m	ailing):		st Number MNA B. State (	r 8749904 ate Generator's ID		
DETROIT, MICHIGAN 48214 4. Generator's Phone- 313-824-5882									
5. Transporter 1 Company Name 7. Transporter 2 Company Name			A ID Number			ansporter's II orter's Phone	)		
9. Designated Facility Name and S			A ID Number			ansporter's IE orter's Phone	)		
Woodland Meadows 5900 Hannan Road Wayne Michigan 48184	te Address	10. US E	PA ID Number		G. State F H. State F	acility ID acility Phone	734-326-3	003	
11. Description of Waste Material			12. Co No.	ntainers Type	13. Total Quantity	14. Unit Wt./Vol.	I. N	lisc. Comme	nts
a. Non-Hazardous Soil WM Profile # 121192MI									
WM Profile # 121192IVII b.							1.000		-
WM Profile #			-	10 200		-	102.8	_	
WM Profile # d.						11-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1		50000	
WM Profile # J. Additional Descriptions for Ma	erials Listed Above		K Dispos	al Location	1. 22		1		
Color – Blk/Brwn Physic	al State – Solid	Odor - No		Location				_	
BILL TO: Petro-Chem			Cell Grid		-		Level		
15. Special Handling Instructions a	nd Additional Inform	ation							
Purchase Order #			CONTACT / PHI 313-824-5882	ONE NO.:		-			
16. GENERATOR'S CERTIFICATE: -									
I hereby certify that the above-dest accurately described, classified and	packaged and are in	proper condition for trans	portation acco	art 261 or a rding to ap	any applicable plicable regul	state law, ha ations.	ve been ful	ly and	
Printed Name	William Str.	Signature "On be	half of"	lille -	7+ %	5	Month	Day	Y
17. Transporter 1 Acknowledgeme	nt of Receipt of Mate	rials							
Printed Name		Signature					Month	Day	Y
18. Transporter 2 Acknowledgeme	nt of Receipt of Mate	rials							-
Printed Name	inted Name Signature						Month	Day	Y
9. Certificate of Final Treatment/	Certificate of Final Treatment/Disposal								
certify, on behalf of the above list applicable laws, regulations, permit	ed treatment facility, is and licenses on the	dates listed above.				is managed in	complianc	e with all	
<ol> <li>Facility Owner or Operator: Ce Printed Name</li> </ol>	rtification of receipt	of non-hazardous materia Signature	s covered by th	is manifest	t,		Menth	Davi	1.1
		Signature					Month	Day	Y
White- TREATMENT, STORAGE, DIS	POSAL FACILITY COP	Blue- GENERAT	OR #2 COPY		Yel	ow- GENERAT	OR #1 COP	Ϋ́	-

NON-HAZARDOUS MANIFEST	1. Generator's US E	EPA ID No.	Manifest Do	: No.	2. Page 1	of			
3. Generator's Mailing Address: PETRO-CHEM PROCESSING		enerator's Site Addres	S (If different than	mailing):		st Number	8749	9905	
421 LYCASTE DETROIT, MICHIGAN 48214 4. Generator's Phone- 313-824-5882	5/	AME				B. State (	Senerator's	ID	
5. Transporter 1 Company Name		6. US E	PA ID Number			ransporter's II	)		
7. Transporter 2 Company Name		8. US E	PA ID Number	-	D. Transp	orter's Phone	-		-
					and the second sec	ransporter's IE orter's Phone	)		
9. Designated Facility Name and Site Woodland Meadows	Address	10. US	EPA ID Numbe	r	C. Shate I		-		-
5900 Hannan Road Wayne Michigan 48184			_		G. State F H. State F	acility ID acility Phone	734-326-3	1003	
11. Description of Waste Materials				Containers	13. Total	14. Unit	LN	lisc. Commer	nts
a. Non-Hazardous Soil			No.	Туре	Quantity	Wt./Vol.			-
			1	1	1	T			
WM Profile # 121192MI b.					-	1	8.00		
D.									
WM Profile #			-	-			-	-	
c.									
WM Profile #			Concession of	1				-	-
d.							× .		
WM Profile # 1. Additional Descriptions for Mater	ials Listed Above		K Disp	osal Location					
a second s	dditional Descriptions for Materials Listed Above								
BILL TO: Petro-Chem	rO: Petro-Chem						Level		
15. Special Handling Instructions and	Additional Informati	on	Grid						
Purchase Order #			CONTACT / PI						
16. GENERATOR'S CERTIFICATE: - ML	ist Be Printed ar		ad by the G						
I hereby certify that the above-descril	bed materials are not	t hazardous wastes as o	defined by CFR	Part 261 or	any applicabl	e state law, ha	ive been fu	lly and	
accurately described, classified and pa Printed Name	ickaged and are in pr	roper condition for tran Signature "On b		ording to ap	oplicable regu	lations.	Month	Day	Y
Diel 5 60	Alter have	Signature on t	ichan of				Teronen	Day	
17. Transporter 1 Acknowledgement	of Receipt of Materia						-		
Printed Name		Signature				Month	Day	Y	
18. Transporter 2 Acknowledgement	of Receipt of Materia	als					1		
Printed Name Signature		Signature					Month	Day	Y
19. Certificate of Final Treatment/Dis	posal						1		
I certify, on behalf of the above listed	treatment facility, th	at to the best of my kr	owledge, the a	bove-descr	ibed waste w	as managed ir	complianc	e with all	
applicable laws, regulations, permits a 20. Facility Owner or Operator: Certi			ale covered by	this manife	+				
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Wayne Michigan 48184					H. State F	acility Phone	734-326-3	003	-
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Appendix II

Final MPE Pilot Test Report

# CleanEarth

July 10, 2020

Mr. Dan Dailey Michigan Department of Environmental Quality Management and Tracking Unit Hazardous Waste Section PO Box 30241 Lansing, MI 48909

## Subject: Multi-Phase Extraction Pilot Test Report for Petro-Chem Processing Group of Nortru, LLC Detroit, MI. MID 980 615 298

Dear Mr. Dailey:

As requested of Petro-Chem Processing Group of Nortru, LLC, enclosed please find the Multi-Phase Extraction Pilot Test Report. The report was developed by Apex Companies on behalf of Nortru, LLC as requested by EGLE.

If you have any questions, please contact me at 215-822-2337.

Sincerely,

Greg Fink EHS Director

cc: Ed Burke, Stericycle Kellie Wing, Apex Companies Multi-Phase Extraction Pilot Test Report Nortru, LLC Petro-Chem Processing Group Facility 421 Lycaste Street, Detroit, MI

July 10, 2020

## **CERTIFICATION STATEMENT**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to 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.

Greg Fink EHS Director

APEX COMPANIES, LLC

## Multi-Phase Extraction Pilot Test Report West Berm Area

Petro-Chem Processing Group of Nortru, LLC Facility 421 Lycaste Street Detroit, Michigan

MID 980 615 298

July 10, 2020 Project No. 11019-000128.01

Prepared for: Clean Earth Detroit, Michigan

Apex Companies, LLC 46555 Humboldt Drive Suite 103 Novi, Michigan 48377





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- D Historical Groundwater Elevations in Well MW-11
- E Typical MPE System Flow Diagram



## 1.0 INTRODUCTION

Clean Earth, formerly Stericycle Environmental Solutions, Inc., retained Apex Companies, LLC (Apex) to conduct a Pilot Test using Multi-Phase Extraction (MPE) technology to evaluate full-scale implementation for treatment of soil and groundwater at the Petro-Chem Processing Group of Nortru, LLC facility (Site) located at 421 Lycaste Street in Detroit, Michigan.

The purpose of the test was to evaluate if MPE is a viable alternative to lower the groundwater level and reduce contaminant concentrations in soil below the soil volatilization to indoor air (SVIA) criteria while reducing the potential for lateral migration of contaminated soil vapors beyond the site boundaries.

This report was prepared in accordance with the Revised Corrective Measures Implementation Work Plan (CMIWP) submitted to the Michigan Department of Environment Quality [MDEQ, currently Michigan Department of Environment, Great Lakes, and Energy (EGLE)], on May 15, 2018. Since delineation of contamination associated with the vapor intrusion pathway and perfluoroalkyl and polyfluoroalkyl substances (PFAS) constituents in groundwater was not complete, EGLE provided partial approval of the work plan as interim measures. The Site is a Hazardous Waste Treatment and Storage Facility operating in accordance with the Hazardous Waste Management Facility Operating License (Operating License, MID 980 615 298) and Groundwater Monitoring Program dated December 18, 2012. The CMIWP proposed a Pilot Test of the MPE Technology. The results of the Pilot Test and proposed MPE implementation are presented in this report.

## 1.1 SITE DESCRIPTION AND HISTORY

#### 1.1.1 <u>Site Description</u>

The Site is located at 421 Lycaste Street in Detroit, Wayne County, Michigan. Parts of the Site historically operated as an Amoco refinery and currently operates as a fuel blending and solvent recycling plant. Spent solvents, rags, fuel sludges, and tank bottoms are brought to the facility where these materials are either cleaned and recycled or sold as fuel to cement kilns. The Site is situated on an estimated 8-acre parcel in an industrial and residential area approximately 0.5 mile north of the Detroit River. The Site is surrounded by industrial properties to the north; Lycaste Street to the east, Freud Street to the south, and Old St. Jean Street to the west. See Figure 1 for site location.

#### 1.1.2 <u>Historic Environmental Investigations</u>

Multiple phases of environmental assessment, including soil, soil gas, and groundwater investigation, have been conducted at the Site since 1982 by Tetra Tech, Philip Environmental Services Company, and the HSE Division of Bureau Veritas (now Apex). A summary of the investigation is included in the *Corrective Measures Implementation Work Plan* dated October 20, 2017.

#### 1.1.3 Contaminants of Concern

Concentrations of volatile organic compounds (VOCs), including gasoline compounds benzene, ethylbenzene, toluene, methyl *tert*-butyl ether (MTBE), and chlorinated solvents including tetrachloroethene (PCE) and the degradation constituents [i.e., trichloroethene (TCE), *cis*-1,2-



dichloroethene (*cis*-1,2-DCE), and 1,1-dichloroethene (1,1-DCE)], are the primary contaminants of concern and have historically been detected in soil, soil gas, and/or groundwater.

Soil or groundwater concentrations exceed the volatilization to indoor air criteria in the western soil berm area, where samples were collected from BSB-12, BSB-13, BSB-42, BSB-43, BSB-44, BSB-45, and MW-11; this area will be targeted for corrective action under a full-scale MPE system. See Figure 2 for the site layout.

Contamination in the western soil berm area represents the largest and most significant source of onsite soil and groundwater contamination.

#### 2.0 FIELD ACTIVITIES

Field activities preceding the MPE Pilot Test included the installation of an extraction well, two multi-nested probes, and two piezometers.

## 2.1 EXTRACTION WELL, VACUUUM MONITORING POINTS, AND PIEZOMETER INSTALLATIONS

On December 11, 2019, Job Site Services, Inc. (JSSI) under the direction of Apex, installed Extraction Well EXW-1, nested Vacuum Monitoring Wells VMW-1 and VMW-2, and Piezometers PZ-1 and PZ-2. The shallow vacuum monitoring wells were identified as VMW-1S and VMW-2S, while the deep wells were identified as VMW-1D and VMW-2D.

The MPE extraction well was constructed using a 4-inch-diameter 20-slot (0.020-inch) well screen, installed from 5 to 15 feet below grade (i.e., a 10-foot-long section).

Nested Vacuum Monitoring Wells VMW-1 and VMW-2, containing temporary subsurface vacuum monitoring probes, were installed approximately 14 feet and 36 feet from Extraction Well EXW-1, respectively. Each nested well contained a deep and a shallow vacuum monitoring probe, the deep probe was installed just above the measured groundwater elevation at a depth of 8.5 feet and the shallow probe was installed at a depth of 4.5 feet.

Two temporary piezometers were installed to measure the water table elevation response to the vacuum applied at the extraction well during the Pilot Test. Piezometers PZ-1 and PZ-2 were located approximately 8 feet and 36 feet from Extraction Well EXW-1, respectively. Each piezometer consisted of (1) 1.5-inch-diameter, 10-foot-long Schedule 40 PVC screen (with 0.02 machine-slots) installed 5 feet to 15 feet below ground surface and (2) a solid PVC riser pipe from 5 feet to the surface. The top of each piezometer was fitted with a PVC well cap to prevent preferential pathways of air flow during the Pilot Test.

Construction details for Extraction Well EXW-1, nested Vacuum Monitoring Wells VMW-1 and VMW-2, and Piezometers PZ-1 and PZ-2 are included in Appendix A. The location of the extraction well, nested vacuum monitoring wells, and piezometers are depicted in Figure 3.

#### 2.2 MPE TEST SETUP AND FIELD PROCEDURES

On December 16 and 17, 2019, JSSI personnel conducted MPE activities using a 2,500-gallon vacuum truck and collected field monitoring data under the direction of Apex.

MPE was conducted using EXW-1 as the extraction well. A 4-inch-by-2-inch reducer/adaptor was installed on the wellhead. The vacuum line for the extraction well was attached to a 2-inch-diameter header pipe equipped with a 1-inch-diameter suction pipe (i.e., drop tube) inside the



well. The 1-inch-diameter pipe intake was placed at a depth of approximately 14 feet below the top-of-casing in the well. The field data collection procedures were followed during both days of operation as described below.

Field measurements collected during the test included inlet groundwater drawdown, vacuum response in nested vacuum extraction wells, air extraction flowrates, VOC concentrations (measured with a MiniRAE 3000 photoionization detector [PID]), and estimated mass removal rates. Copies of the field data sheets are included in Appendix B.

Details of the MPE test and results are presented below.

## 2.3 STEP TEST

On December 16, 2019, the MPE step test was conducted to evaluate (1) the radial influence of applying a vacuum to well EXW-1 and (2) the optimum vacuum extraction rate that could be used for an 8-hour constant-vacuum test planned for the second day of the Pilot Test. The step test was conducted using three vacuum rates for 2 hours at each rate. The vacuum was adjusted by the variable engine speeds (700, 1,000 and 1,300 revolutions per minute) corresponding to 6, 9, and 13 inches of mercury (in Hg) at the inlet, respectively. After approximately 30 minutes from start up, the water level in EXW-1 was maintained.

#### 2.3.1 Groundwater Drawdown Measurements

Prior to MPE startup, depth-to-water and well depth were measured at EXW-1, PZ-1, PZ-2, and MW-11. Pressure transducers connected to data loggers were installed in EXW-1, PZ-1, and PZ-2 to measure water level drawdown. An additional sensor to monitor barometric pressure was installed near well EXW-1. The data loggers were set to record every 60 seconds. The barometric pressure sensor was used to adjust the datalogger measurements in EXW-1, PZ-1 and PZ-2 using the Aqua4Plus<sup>®</sup> software for the PT2X<sup>®</sup> sensors.

Drawdown readings during the step test are included in Table 1. The maximum drawdowns in wells EXW-1, PZ-1 and PZ-2 were 2.58, 0.56, and 0.11 feet, respectively, with an inlet vacuum of 13 in Hg at EXW-1 as depicted in Figure 4. The maximum drawdown measured in MW-11 was 0.31 feet at an inlet vacuum of 13 in Hg.

#### 2.3.2 Vacuum Measurements

Following start-up, vacuum was measured in VMW-1S, VMW-1D, VMW-2S, and VMW-2D every 15 minutes for the first hour, and every half an hour thereafter until conclusion of each test in order to monitor the area of influence. In addition, vacuum was measured in the vacuum line, extraction well casing, and vacuum truck. Vacuum responses were observed in both vacuum monitoring wells with higher vacuums readings observed in the deeper probes (i.e., VMW-1D and VMW-2D). Vacuum responses generally increased as the applied vacuum was increased. The highest vacuum in the EXW-1 casing was 26 inches of water (in H<sub>2</sub>O). Vacuum readings up to 0.79, 2.52, 0.22, and 0.32 in H<sub>2</sub>O in VMW-1S, VMW-1D, VMW-2S, VMW-2D, respectively, were observed in the vapor monitoring wells (Appendix A).

#### 2.3.3 Flowrate and Mass Removal Rates

A photoionization detector (PID) was used to measure offgas VOC concentrations every 15 minutes for the first hour, and every half hour thereafter until conclusion of each test. The maximum PID reading observed was 5,245 parts per million (ppm). Based on PID concentrations, the total mass of vapor phase hydrocarbons removed during the Pilot Test was calculated to be approximately 12 pounds. Field data sheets are provided in Appendix B.



	INLET VACUUM (in hg)	TIME	TIME INTERVAL (min)	FLOWRATE (cfm)	WEIGHTED AVERAGE FLOWRATE (cfm)			
	2	10:30	0:00	70				
	$  _{1} =   _{1} =   _{1}$	10:45	0:15	70				
		11:00	0:15	44				
	7	11:15	0:15	70	63.4			
		11:30	0:15	70				
		12:00	0:30	61				
1.		12:30	0:30	61				
	1	13:00	0:30	79				
est	1.1	13:15	0:15	74				
Step Test		13:30	0:15	70	76.1			
Ste	9	13:45	0:15	70				
		14:00	0:15	79				
		14:30	0:30	83				
		15:00	0:30	83				
1		15:15	0:15	87				
		15:30	0:15	87				
	13	15:45	0:15	87	86.8			
		16:00	0:15	87				
		17:00	1:00	87				

As shown below, the maximum effluent gas flowrate from EXW-1 was 87 cubic feet per minute (cfm) at an inlet vacuum of 13 in Hg.

in Hg = inch of mercury

A total of 260 gallons of liquid was recovered from the wells during the step test. Using a total operation time of 6.5 hours, the average groundwater flowrate at EXW-1 was approximately 0.7 gallons per minute (gpm). The extracted groundwater was treated and disposed of at the Site.

#### 2.4 CONSTANT VACUUM TEST

Prior to MPE startup, the depth-to-water was measured at well location MW-11 and data loggers were installed in wells EXW-1, PZ-1, and PZ-2. Based on evaluation of the step test field data, the constant rate test was conducted at a vacuum of 11 in Hg at the inlet MPE for 8 hours.

#### 2.4.1 Groundwater Drawdown Measurements

Groundwater drawdown was measured in the same manner as the step test. The maximum drawdown recorded with the pressure transducers in wells EXW-1, PZ-1 and PZ-2 were 2.58, 0.49, and 0.11 feet, respectively, as depicted in Figure 5. The maximum drawdown measured in MW-11 was 0.33 feet. The maximum drawdown vs. distance during the constant vacuum test is shown in Figure 6. Datalogger readings during the constant rate test are included in Table 2.



#### 2.4.2 Vacuum Measurements

Vacuum readings were measured in wells VMW-1S, VMW-1D, VMW-2S, VMW-2D, and MW-11 in the same manner as the step test. Vacuum responses were observed in both vacuum monitoring wells, with higher vacuum readings observed in the deeper probes (VMW-1D and VMW-2D). The highest vacuum in the EXW-1 casing was 26 in H<sub>2</sub>O. The highest readings in the vapor monitoring probes were 0.73, 3.1, 0.22, and 0.15 in H<sub>2</sub>O in VMW-1S, VMW-1D, VMW-2S, and VMW-2D, respectively. Figure 7 shows a graph of the vacuum response from EXW-1 versus distance during the constant rate test. The measurements indicate that there was a vacuum response and airflow from the area of the monitoring points toward the extraction point.

#### 2.4.3 Flowrate and Mass Removal Rates

Offgas concentrations were measured every 15 minutes for the first hour, and every half hour thereafter until conclusion of the test. The maximum PID measurement was 1,994 ppm. Based on PID concentrations, the total mass of vapor phase hydrocarbons removed during the constant rate test was calculated to be approximately 10 pounds. The maximum air extraction flowrate at EXW-1 was 87 cfm. Field data sheets are provided in Appendix B.

It should be noted that the calculations presented in the attached data sheets assume that the contaminants removed were primarily petroleum-based. Similarly, the PID was equipped with a 10.6-eV lamp to monitor hydrocarbon vapors and a 6.25 pounds/gallon (the specific weight of gasoline) conversion factor was used to convert pounds of vapor removed to gallons.

A total of 260 gallons of liquid was recovered from the wells. Using a total operation time of 8 hours, the average groundwater flowrate was approximately 0.5 gpm. The recovered fluids were treated and disposed of by the Site.

#### 3.0 GROUNDWATER AND AIR EFFLUENT MEASUREMENTS

Approximately 520 gallons of groundwater were extracted during the Pilot Test. A sample of the extracted groundwater was analyzed for volatile organic compounds (VOCs) by United States Environmental Protection Agency (USEPA) Method 8260 and transferred to an aboveground storage tank for profiling and disposal by Stericycle.

Two air effluent samples from EXW-1were analyzed for VOCs per USEPA Method TO-15. All samples were analyzed by Fibertec Environmental Services located in Holt, Michigan. Copies of the analytical laboratory results are included as Appendix C.

#### 4.0 PILOT TEST SUMMARY AND CONCLUSIONS

The MPE Pilot Test was conducted for 2 days while applying four different vacuum settings at the extraction well. Under each vacuum setting, the water level in the extraction well was lowered to the bottom of the drop tube and maintained while various parameters were measured at the observation points.

#### 4.1 CONTAMINANT MASS REMOVED

Approximately 520 gallons of groundwater were extracted during the MPE test. A sample of the extracted groundwater was analyzed for VOCs by EPA Method 8260. Based on the laboratory analysis and total groundwater volume removed, an estimated 0.45 pounds of VOCs were removed during the pilot test. The total mass of VOCs removed via the air stream, based on PID measurements, was 22 pounds.



The purpose of MPE is to enhance vapor extraction; as such, the contaminant mass in the gas phase should exceed the mass in the liquid phase. The ratio of contaminant mass removed via air extraction versus groundwater (i.e., 2%) indicates that the MPE technology functioned as intended.

#### 4.2 GROUNDWATER DRAWDOWN AND DEWATERING RADIUS OF INFLUENCE

The objective of extracting groundwater during MPE is to lower the water table and expose the "smear" zone to vapor extraction.

The historical high and low water levels in a well with a screen that straddles the water table provides a minimum thickness of the smear zone. Gauging data collected since June 2016 in Monitoring Well MW-11 indicates a water level fluctuation of 0.65 feet. See Appendix D for groundwater elevations in Monitoring Well MW-11. The drop tube depth was fixed during the entire MPE Pilot Test and was effective in extracting both groundwater and air, even at the lower vacuum (see table below).

INLET VACUUM			AVERAGE AIR	MAXIMU	WN (feet)	MAXIMUM REMOVAL	
(in Hg)	(in Hg)	(in H <sub>2</sub> O)	FLOWRATE (cfm)	PZ-1	PZ-2	MW-11	RATE (lb VOCs/hr)
6†	1.1	15	63	0.37	0.07	0.17	1.67
9†	1.54	21	76	0.48	0.09	0.25	3.60
13†	1.9	26	87	0.56	0.11	0.31	2.39
11‡	1.7	23	87	0.49	0.11	0.33	1.52

#### AIR AND GROUNDWATER MEASUREMENTS

+ Step test vacuum

‡ Constant rate test

The maximum groundwater drawdown during MPE testing in observation well PZ-1, located 10 feet from EXW-1, was of 0.5 feet; the drawdown in MW-11 located 13 feet from EXW-1 was 0.33 feet; the drawdown in PZ-2 located 36 feet from EXW-1 was less than 0.1 feet. See Tables 1 and 2 for the data and Figure 6 for a drawdown versus distance graph.

Both groundwater drawdown and radius of hydraulic influence were not large; however, the drop tube was only submerged 2.6 feet during the test and could be lowered further. The influence at 10 feet represented 0.5 foot of drawdown in a 0.65 foot smear zone, or a 77% coverage of the smear zone; therefore, this drawdown indicates the MPE is applicable in the targeted zone. Once steady state conditions are achieved, the dewatering radius of influence is expected to increase.

#### 4.3 VACUUM RADIUS OF INFLUENCE

Figure 7 demonstrates the vacuum response at probes located in vacuum monitoring wells near EXW-1, with decreasing vacuum with distance from EXW-1. The lower vacuum in VMW-1S compared to VMW-1D is indicative of air flow from the surface. The radius of influence (ROI) of vapor extraction may be expressed as the distance from the extraction well at which the vacuum in soil decreases to 1 in H<sub>2</sub>O. At 25 feet from EXW-1, the vacuum measured by the deep probe was 1.5 in H<sub>2</sub>O and, in the shallow well, approximately 0.6 in H2O. This vacuum ROI is within typical ranges for silty soil under vacuum extraction.



Superimposing the groundwater drawdown and vacuum radius of influence, and considering the air flowrate of 87 cfm and an extraction rate of 1.52 lb/hr, a 25- to 30-foot well spacing (i.e., 15 feet ROI) between extraction wells would achieve the objective of lowering the water table and treating the vadose zone in the western berm area.

Based on these Pilot Test results, MPE using a medium vacuum (12 to 14 in Hg), with extraction wells spaced at 25 to 30 feet would provide a well configuration with vacuum overlap and the dewatering required to remediate VOCs in the targeted area.

#### 4.4 REMEDIAL STRATEGY

The remedial strategy is to remove VOCs in soil and groundwater in the source area: the western berm area of VOC contamination (soil, soil gas, and groundwater). The strategy for MPE remediation is to extract groundwater and soil gas from an array of multiphase extraction wells in the targeted area, thereby lowering water levels and exposing currently submerged and/or capillary fringe soil.

See Figure 8 for proposed MPE well locations. The MPE extraction well construction would be similar to that used for EXW-1. Contaminants in both the groundwater and vapor streams will be treated using activated carbon that will be replaced periodically.

Apex anticipates approximately 3 to 4 years of MPE system operation. Optimization/cycling will be needed to achieve remedial action objectives. However, residual concentrations of contaminants of concern may remain in groundwater when operation of the MPE system is no longer feasible. Therefore, other active remedial measures to achieve remediation goals for groundwater may be necessary. Nevertheless, Apex anticipates that most of the VOC mass in the subsurface soil will be removed by the MPE system. Apex will monitor the downgradient portion of the dissolved VOC plume throughout MPE system operations to evaluate system effectiveness.

## 5.0 MULTI-PHASE EXTRACTION IMPLEMENTATION

Based on the MPE test, the implementation of this technology will be effective in remediating contaminated groundwater and soil gas. The final MPE system may be modified from the conceptual approach.

The MPE will be designed and permitted, the treatment equipment will be selected/procured, and the final design drawings will be provided to EGLE. Apex will coordinate/oversee remedial installation, which will include installation of the wellhead connections, subsurface groundwater and gas conveyance piping, treatment compound, piping manifolds, sewer connection, and utility connections. After installation, the MPE system will be operated in accordance with the applicable permit conditions.

## 5.1 PRELIMINARY EQUIPMENT SPECIFICATIONS

The MPE equipment will consist of a network of vertical MPE vacuum extraction wells, as well as lateral surface and subsurface conveyance piping manifolded to a medium-vacuum (e.g., 12 to 14 in Hg) liquid ring or rotary vane pump equipped with a variable frequency drive. The vacuum will draw groundwater and soil vapor through a single conduit. The groundwater will be separated from the gas aboveground in a knockout tank that is connected to the appropriate treatment processes. Both air and groundwater streams will be treated with granular activated carbon within two 2,000-pound vessels connected in series for each stream. Discharge permits,



including a National Pollutant Discharge Elimination System (NPDES) permit for water discharge and a Permit to Install for air emissions, will be obtained. The location at which groundwater will be discharged will be determined during the permitting process.

Equipment will be installed within a fenced treatment compound with a secondary containment berm. Treatment compound fencing will be affixed with appropriate notification signage and emergency placarding.

General specifications for the proposed MPE system are as follows:

- Fenced treatment compound
- MPE extraction well network consisting of new and the previously installed extraction well, EXW-1 (Figure 3)
- Surface and subsurface vapor and groundwater conveyance piping with sweep elbows (2inch to 4-inch-diameter PVC)
- Medium-vacuum blower package capable of sustaining vacuums of over 14 in Hg and maximum gas flow capacity of approximately 200 to 300 standard cubic feet per minute (scfm)
- Knock-out tank with transfer pump
- Bag filters
- Calibrated flowrate meters
- Optional separation/settling tank
- Two 2,000-pound liquid-phase carbon vessels
- Two 2,000-pound gas-phase carbon vessels

The extent of groundwater plume capture/containment is anticipated to extend beyond the footprint of the western berm area with this design.

As indicated on Figure 8, the proposed MPE well layout, consisting of 16 wells in the western berm area, will allow for overlapping vapor and groundwater capture throughout the source area. Not all wells will be operated simultaneously; the operation of the wells will be cycled in appropriate patterns.

Where applicable, traffic-rated well boxes will generally be installed at each MPE well. The well boxes will be installed flush-mounted with or slightly above the surface grade. The boxes will be bolted to prevent unauthorized access to the wells and will be of sufficient diameter and depth to accommodate the wellhead manifold, valves, and fittings.

A dedicated treated groundwater discharge line will be connected to the onsite stormwater or sewer. The specific discharge point will be determined during further correspondence and permitting with the appropriate government agency and following EGLE approval.



Equipment will be installed so that there will be complete system shut down if a component malfunctions. Construction-related work will be completed according to acceptable practices and local building codes.

A typical MPE system process flow diagram is provided in Appendix E.

## 5.2 DESIGN

Following EGLE approval, Apex will design the remediation system to provide detailed specifications for final system installation and construction, including the proposed piping network. The design specifications will be used to prepare the necessary design drawings for permitting, system/equipment bidding, and long-term operations.



#### Multi-Phase Extraction Pilot Test Report West Berm Area for

Petro-Chem Processing Group of Nortru, LLC 421 Lycaste Street Detroit, Michigan

> **Prepared for:** Clean Earth Detroit, Michigan

Project No. 11019-000128.01

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Kellie L. Wing Program Manager

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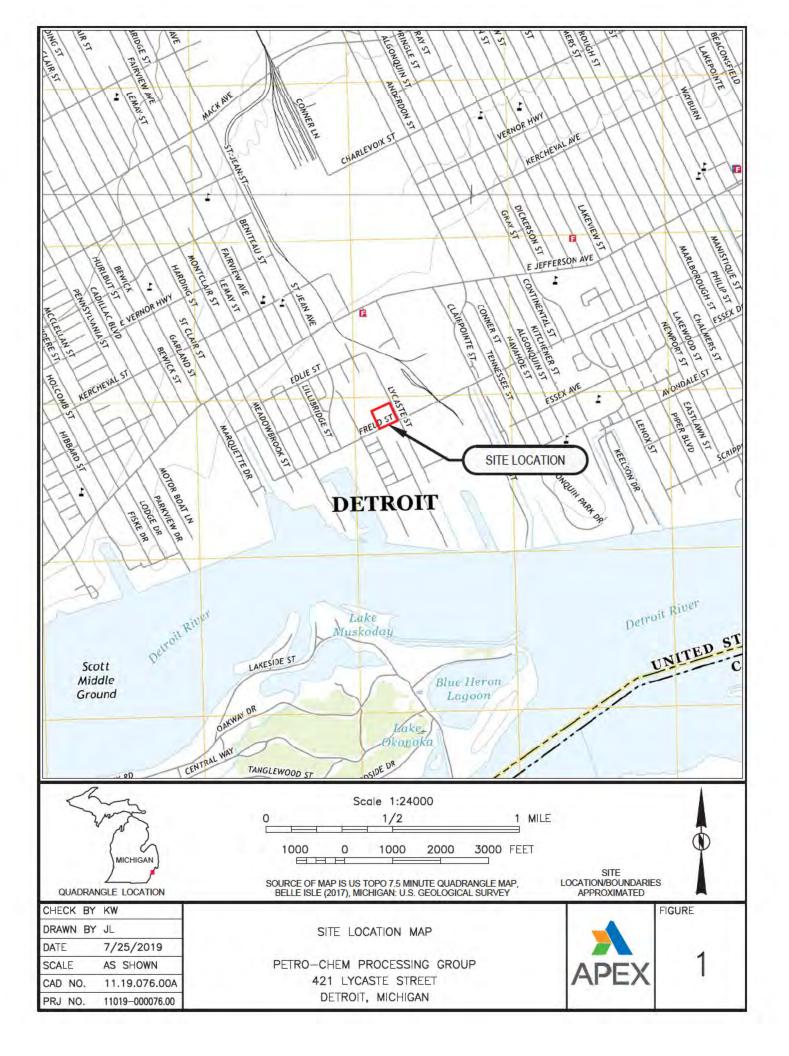
Gustavo Valdivia, P.E. Program Manager

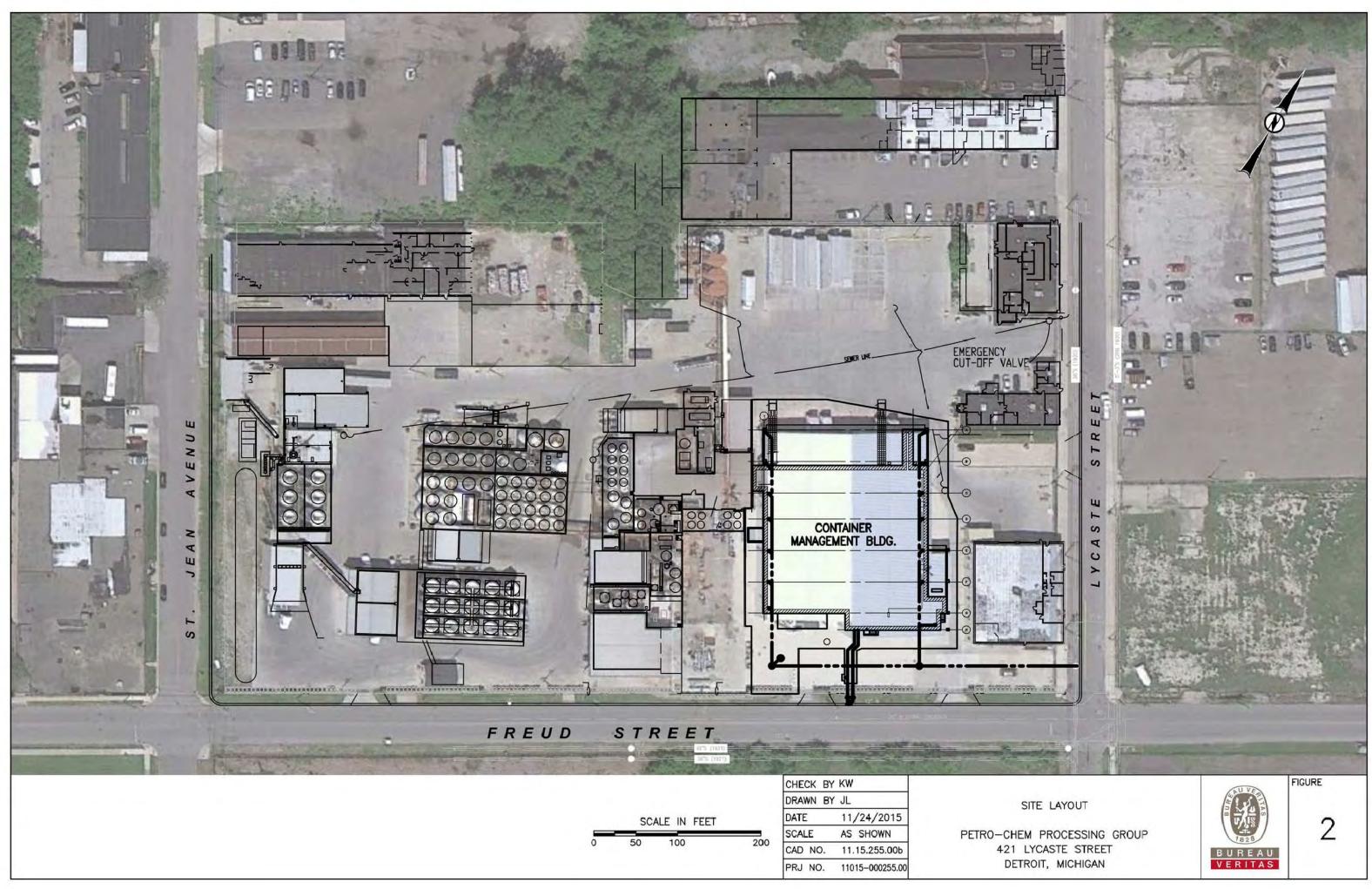
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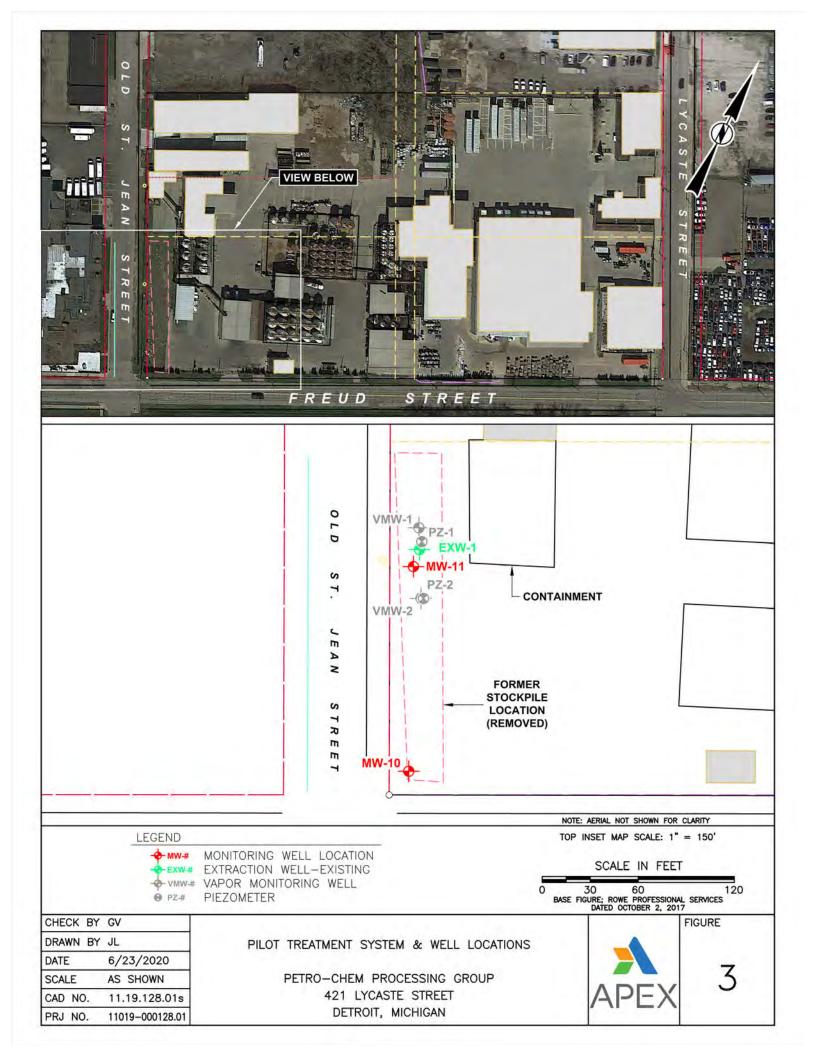
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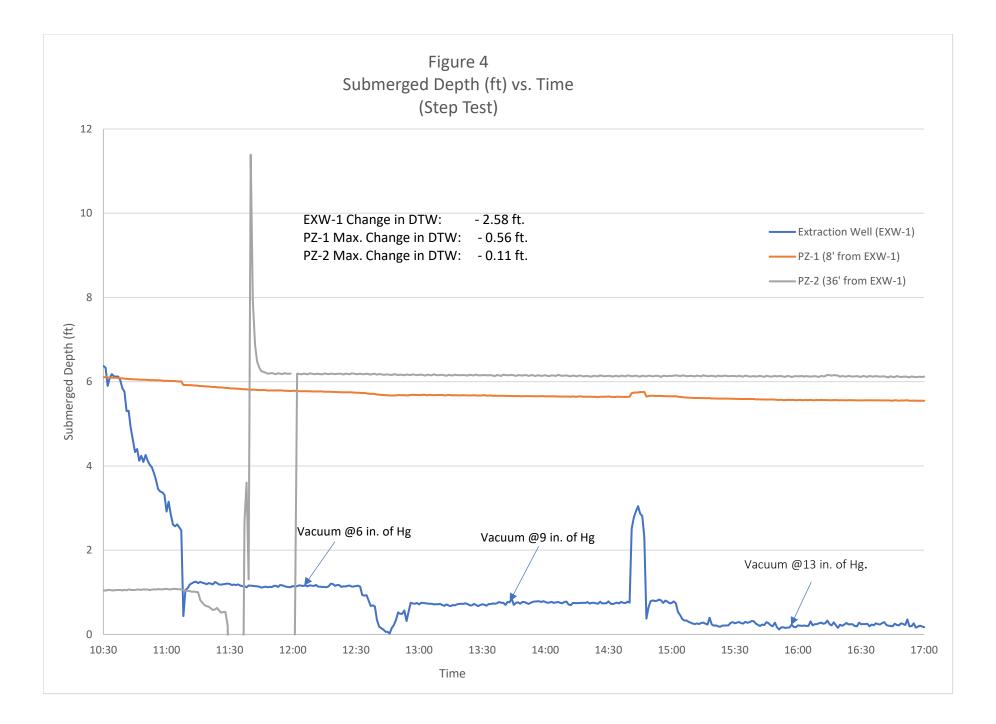


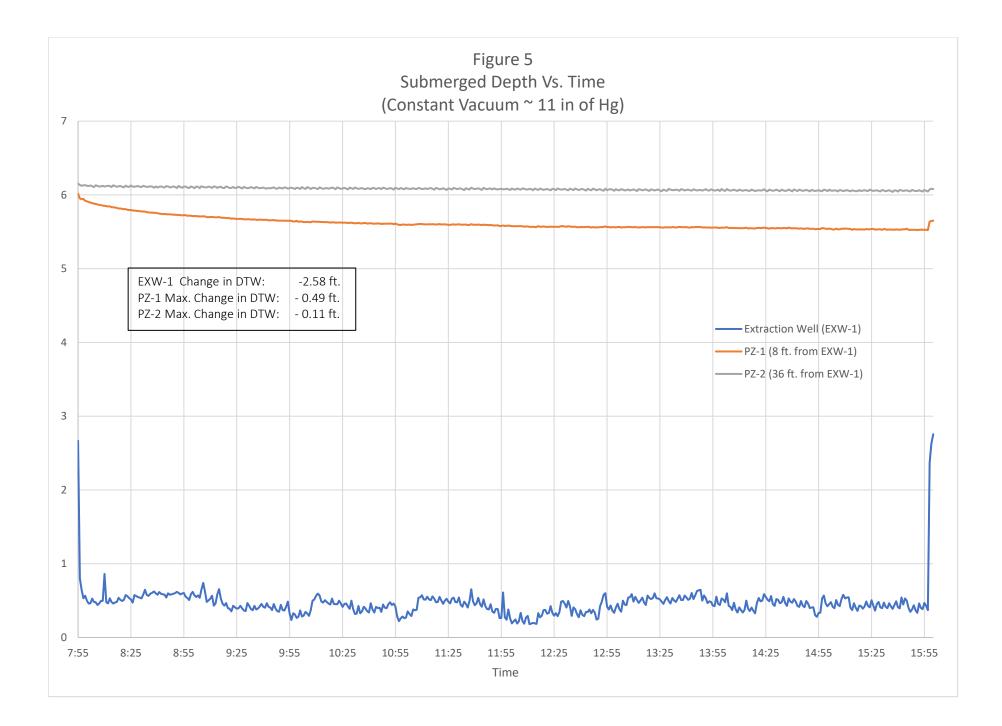
FIGURES

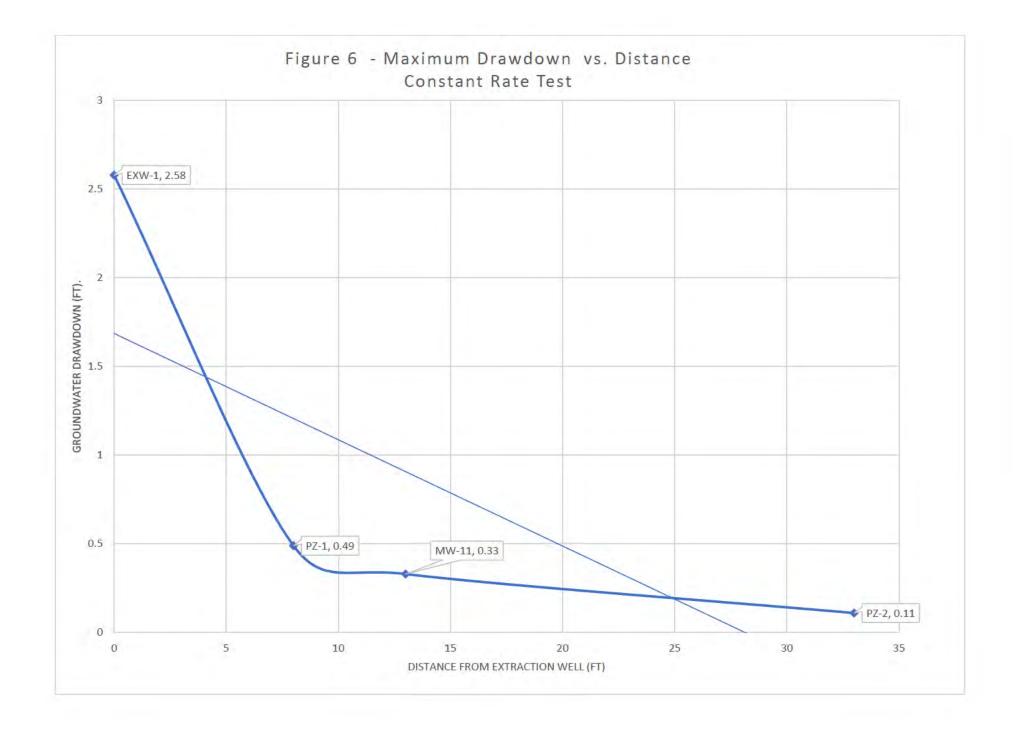


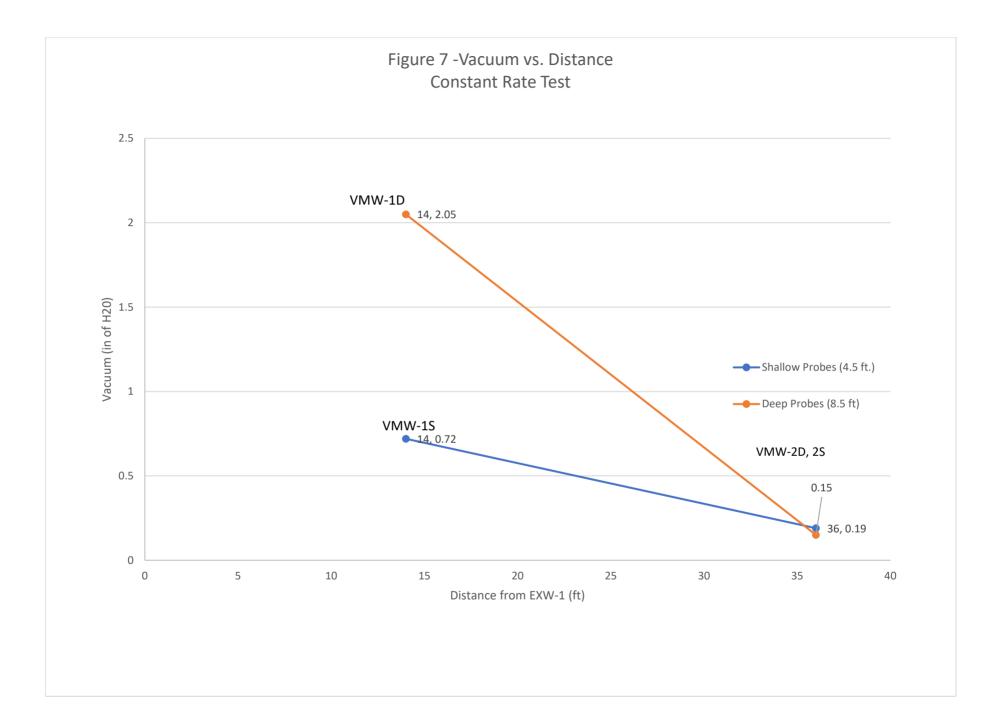


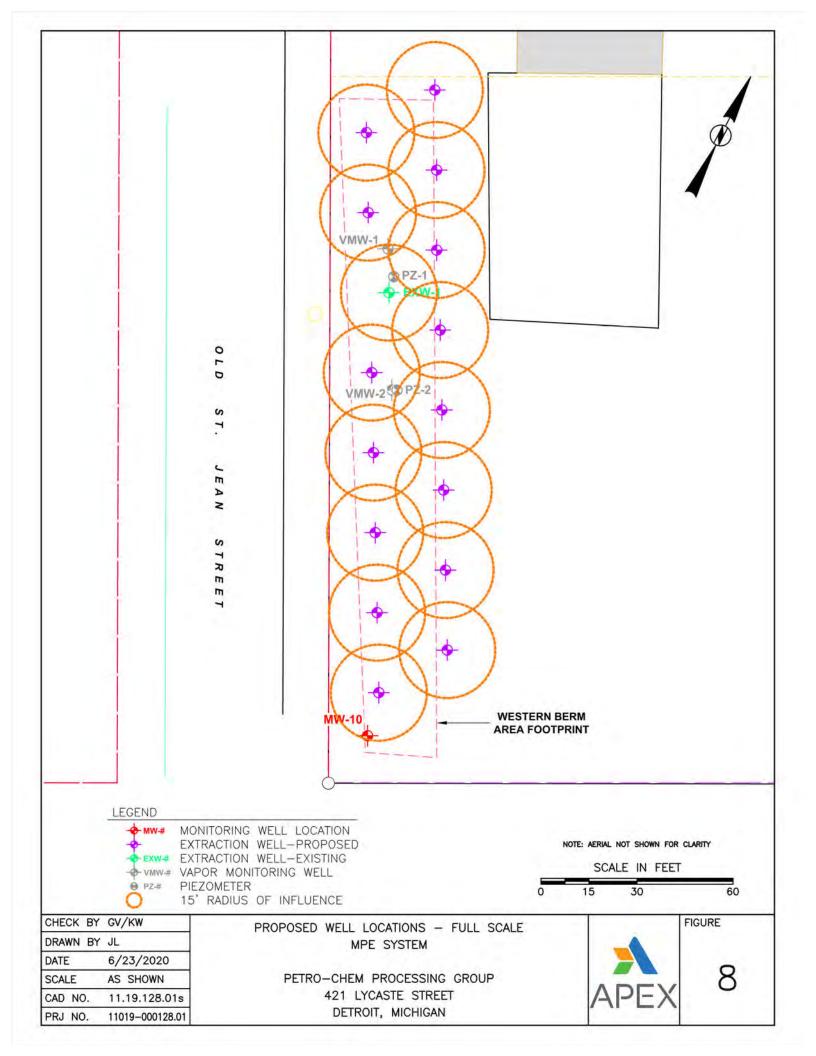














TABLES

Step Test - December 16, 2019           EXW-1         PZ-1         PZ-2							
ļ							
	Depth	Depth	Depth	Depth	Depth	Depth	
	submerged	submerged	submerged	submerged	submerged	submerged	
Time	(psi)	(ft)	(psi)	(ft)	(psi)	(ft)	
10:30	2.7 <mark>6</mark>	<mark>6.</mark> 37	2.64	6.11	2.68	6.19	
10:31	2.74	6.33	2.64	6.11	2.68	6.19	
10:32	2.56	5.90	2.64	6.10	2.67	6.17	
10:33	2.64	6.09	2.64	6.10	2.68	6.19	
10:34	2.68	6.18	2.64	6.10	2.68	6.19	
10:35	2.65	6.13	2.64	6.10	2.67	6.18	
10:36	2.65	6.12	2.64	<mark>6.0</mark> 9	2.68	6.20	
10:37	2.65	6.12	2.64	6.09	2.68	6.19	
10:38	2.61	6.03	2.63	6.08	2.68	6.18	
10:39	2.53	5.84	2.63	6.08	2.68	6.18	
10:40	2.50	5.76	2.63	6.08	2.68	6.19	
10:41	2.30	5.30	2.63	6.07	2.68	6.18	
10:42	2.30	5.31	2.63	6.07	2.67	6.17	
10:43	2.12	4.90	2.62	6.06	2.68	6.20	
10:44	2.00	4.61	2.62	6.06	2.68	6.19	
10:45	1.88	4.33	2.62	6.06	2.68	6.18	
10:46	1.91	4.40	2.62	6.05	2.68	6.19	
10:47	1.79	4.13	2.62	6.05	2.68	6.19	
10:48	1.84	4.24	2.62	6.05	2.68	6.18	
10:49	1.77	4.10	2.62	6.05	2.68	6.19	
10:50	1.84	4.26	2.62	6.05	2.68	6.19	
10:51	1.79	4.12	2.62	6.04	2.68	6.19	
10:52	1.74	4.03	2.62	6.04	2.67	6.17	
10:53	1.72	3.97	2.61	6.03	2.68	6.19	
10:54	1.66	3.84	2.61	6.04	2.68	6.19	
10:55	1.59	3.67	2.61	<mark>6.03</mark>	2.67	6.17	
10:56	1.49	3.45	2.61	6.03	2.68	6.20	
10:57	1.47	3.39	2.61	6.03	2.68	6.19	
10:58	1.46	3.37	2.61	<mark>6.03</mark>	2.68	6.18	
10:59	1.43	3.31	2.61	6.02	2.68	6.18	
11:00	1.26	2.92	2.61	6.02	2.68	6.19	
11:01	1.37	3.15	2.61	6.02	2.68	6.18	
11:02	1.24	2.86	2.60	6.02	2.68	6.18	
11:03	1.13	2.61	2.61	6.02	2.68	6.19	
11:04	1.11	2.57	2.60	6.02	2.68	6.18	
11:05	1.13	2.61	2.60	6.01	2.67	6.17	
11:06	1.10	2.54	2.60	6.01	2.68	6.19	
11:07	1.07	2.47	2.60	6.01	2.68	6.19	
11:08	0.19	0.43	2.56	5.92	2.67	6.17	
11:09	0.46	1.05	2.56		2.68	6.18	

Table 1 Step Test - December 16, 2019

Step Test - December 16, 2019							
	EXV		PZ		PZ		
	Depth	Depth	Depth	Depth	Depth	Depth	
	submerged	submerged	submerged	submerged	submerged	submerged	
Time	(psi)	(ft)	(psi)	(ft)	(psi)	(ft)	
11:10	0.48	1.10	2.56	5.92	2.67	6.18	
11:11	0.51	1.19	2.56	5.92	2.67	6.16	
11:12	0.53	1.22	2.56	5.92	2.67	6.17	
11:13	0.54	1.24	2.56	5.91	2.67	6.17	
11:14	0.54	1.25	2.56	5.91	2.67	6.17	
11:15	0.53	1.22	2.56	5.90	2.67	6.16	
11:16	0.54	1.25	2.55	5.90	2.68	6.18	
11:17	0.53	1.22	2.55	5.90	2.67	6.17	
11:18	0.53	1.22	2.55	5.89	2.67	6.16	
11:19	0.52	1.19	2.55	5.89	2.67	6.17	
11:20	0.53	1.22	2.55	5.89	2.67	6.17	
11:21	0.52	1.21	2.55	5.88	2.66	6.15	
11:22	0.51	1.19	2.54	5.88	2.67	6.17	
11:23	0.54	1.25	2.54	5.87	2.67	6.17	
11:24	0.53	1.22	2.54	5.87	2.67	6.16	
11:25	0.51	1.18	2.54	5.87	2.67	6.18	
11:26	0.51	1.19	2.54	5.86	2.67	6.17	
11:27	0.52	1.19	2.54	5.86	2.67	6.16	
11:28	0.52	1.20	2.53	5.85	2.67	6.16	
11:29	0.52	1.21	2.53	5.85	2.67	6.17	
11:30	0.52	1.20	2.53	5.85	2.67	6.16	
11:31	0.51	1.17	2.53	5.84	2.66	6.14	
11:32	0.51	1.18	2.53	5.84	2.67	6.17	
11:33	0.51	1.17	2.53	5.84	2.67	6.16	
11:34	0.51	1.19	2.53	5.83	2.66	6.15	
11:35	0.50	1.16	2.52	5.83	2.67	6.18	
11:36	0.50	1.15	2.52	5.82	2.67	6.16	
11:37	0.50	1.15	2.52	5.82	2.66	6.15	
11:38	0.49	1.12	2.52	5.82	2.67	6.16	
11:39	0.50	1.16	2.52	5.82	2.67	6.17	
11:40	0.50	1.16	2.51	5.81	2.66	6.15	
11:41	0.50	1.16	2.52	5.81	2.66	6.14	
11:42	0.50	1.15	2.52	5.81	2.67	6.17	
11:43	0.49	1.14	2.51	5.81	2.66	6.15	
11:44	0.49	1.14	2.51	5.80	2.66	6.15	
11:45	0.48	1.11	2.51	5.80	2.67	6.17	
11:46	0.49	1.12	2.51	5.80	2.67	6.16	
11:47	0.49	1.13	2.51	5.80	2.67	6.16	
11:48	0.49	1.12	2.51	5.79	2.66	6.15	
11:49	0.49	1.13	2.51	5.79	2.67	6.16	

Table 1 Step Test - December 16, 2019

Step Test - December 16, 2019           EXW-1         PZ-1         PZ-2							
	Depth	Depth	Depth	Depth	Depth	Depth	
	submerged	submerged	submerged	submerged	submerged	submerged	
Time	(psi)	(ft)	(psi)	(ft)	(psi)	(ft)	
11:50	0.49	1.12	2.51	5.79	2.66	6.15	
11:51	0.50	1.16	2.51	5.79	2.66	6.14	
11:52	0.50	1.15	2.51	5.79	2.67	6.16	
11:53	0.49	1.13	2.51	5.79	2.67	6.16	
11:54	0.51	1.17	2.51	5.80	2.66	6.15	
11:55	0.51	1.17	2.51	5.79	2.67	6.17	
11:56	0.50	1.15	2.51	5.79	2.66	6.15	
11:57	0.49	1.13	2.50	5.78	2.66	6.15	
11:58	0.49	1.12	2.50	5.78	2.66	6.15	
11:59	0.49	1.12	2.50	5.78	2.67	6.16	
12:00	0.50	1.15	2.50	5.78	2.66	6.15	
12:01	0.49	1.14	2.50	5.78	2.66	6.15	
12:02	0.50	1.15	2.50	5.78	2.67	6.16	
12:03	0.51	1.17	2.50	5.78	2.66	6.15	
12:04	0.50	1.16	2.50	5.78	2.66	6.13	
12:05	0.50	1.15	2.50	5.78	2.67	6.16	
12:06	0.50	1.16	2.50	5.77	2.66	6.15	
12:07	0.49	1.14	2.50	5.77	2.66	6.14	
12:08	0.50	1.16	2.50	5.78	2.67	6.17	
12:09	0.50	1.16	2.50	5.77	2.67	6.16	
12:10	0.50	1.15	2.50	5.77	2.66	6.15	
12:11	0.51	1.18	2.50	5.77	2.67	6.16	
12:12	0.49	1.14	2.50	5.77	2.67	6.16	
12:13	0.49	1.13	2.50	5.77	2.66	6.15	
12:14	0.49	1.13	2.50	5.77	2.66	6.14	
12:15	0.49	1.13	2.49	5.76	2.67	6.16	
12:16	0.48	1.12	2.50	5.76	2.66	6.15	
12:17	0.50	1.14	2.50	5.76	2.66	6.14	
12:18	0.52	1.20	2.49	5.76	2.67	6.16	
12:19	0.52	1.20	2.50	5.76	2.67	6.16	
12:20	0.50	1.15	2.49	5.76	2.66	6.14	
12:21	0.51	1.17	2.49	5.75	2.66	6.15	
12:22	0.51	1.17	2.49	5.75	2.67	6.16	
12:23	0.49	1.13	2.49	5.75	2.66	6.14	
12:24	0.49	1.14	2.49	5.74	2.66	6.15	
12:25	0.49	1.14	2.49	5.75	2.66	6.15	
12:26	0.50	1.16	2.49	5.75	2.66	6.14	
12:27	0.50	1.16	2.49	5.75	2.66	6.15	
12:28	0.49	1.14	2.49	5.75	2.67	6.16	
12:29	0.49	1.14	2.49	5.74	2.66	6.14	

Table 1 Step Test - December 16, 2019

Step Test - December 16, 2019           EXW-1         PZ-1         PZ-2							
	Depth	Depth	Depth	Depth	Depth	Depth	
	submerged	submerged	submerged	submerged	submerged	submerged	
Time	(psi)	(ft)	(psi)	(ft)	(psi)	(ft)	
12:30	0.50	1.15	2.48	5.74	2.66	6.13	
12:31	0.50	1.16	2.49	5.74	2.66	6.15	
12:32	0.49	1.13	2.48	5.74	2.66	6.14	
12:33	0.40	0.93	2.48	5.73	2.66	6.14	
12:34	0.40	0.92	2.48	5.73	2.67	6.16	
12:35	0.40	0.93	2.48	5.72	2.66	6.15	
12:36	0.35	0.81	2.48	5.72	2.66	6.14	
12:37	0.29	0.67	2.47	5.71	2.66	6.14	
12:38	0.30	0.69	2.47	5.71	2.66	<b>6.15</b>	
12:39	0.29	0.67	2.47	5.71	2.66	6.14	
12:40	0.15	0.34	2.47	5.70	2.65	6.13	
12:41	0.08	0.18	2.47	5.69	2.66	6.15	
12:42	0.06	0.15	2.46	5.69	2.66	6.14	
12:43	0.05	0.12	2.46	5.68	2.65	6.13	
12:44	0.03	0.06	2.46	5.68	2.66	6.15	
12:45	0.03	0.06	2.46	5.68	2.66	6.14	
12:46	0.01	0.02	2.46	5.67	2.65	6.13	
12:47	0.07	0.15	2.46	5.68	2.66	6.13	
12:48	0.10	0.23	2.46	5.67	2.66	6.14	
12:49	0.15	0.34	2.46	5.67	2.65	6.13	
12:50	0.23	0.52	2.46	5.68	2.65	6.12	
12:51	0.21	0.49	2.46	5.68	2.66	6.14	
12:52	0.21	0.49	2.46	5.68	2.66	6.14	
12:53	0.25	0.57	2.46	5.68	2.65	6.13	
12:54	0.14	0.32	2.46	<mark>5.6</mark> 8	2.66	6.15	
12:55	0.24	0.55	2.46	<mark>5.6</mark> 8	2.66	6.14	
12:56	0.33	0.75	2.46	5.69	2.65	6.13	
12:57	0.32	0.73	2.46	5.69	2.66	6.14	
12:58	0.32	0.73	2.46	5.68	2.66	6.14	
12:59	0.32	0.75	2.46	5.68	2.66	6.13	
13:00	0.31	0.71	2.46	5.68	2.65	6.12	
13:01	0.33	0.75	2.46	5.68	2.66	6.14	
13:02	0.32	0.75	2.46	5.69	2.66	6.14	
13:03	0.32	0.74	2.46	5.68	2.65	6.12	
13:04	0.32	0.73	2.46	5.68	2.66	6.14	
13:05	0.32	0.73	2.46	5.69	2.66	6.14	
13:06	0.32	0.73	2.46	5.68	2.65	6.13	
13:07	0.31	0.71	2.46	5.68	2.66	6.15	
13:08	0.31	0.72	2.46	5.68	2.66	6.14	
13:09	0.31	0.72	2.46	5.68	2.65	6.13	

Table 1 Step Test - December 16, 2019

Step Test - December 16, 2019           EXW-1         PZ-1         PZ-2							
	Depth	Depth	Depth	Depth	Depth	Depth	
	submerged	submerged	submerged	submerged	submerged	submerged	
Time	(psi)	(ft)	(psi)	(ft)	(psi)	(ft)	
13:10	0.31	0.73	2.46	5.68	2.66	6.13	
13:11	0.30	0.70	2.46	5.68	2.66	6.14	
13:12	0.29	0.68	2.46	5.68	2.65	6.13	
13:13	0.31	0.71	2.46	5.68	2.65	6.12	
13:14	0.30	0.69	2.46	5.68	2.66	6.15	
13:15	0.29	0.67	2.46	5.68	2.66	6.14	
13:16	0.30	0.70	2.46	5.68	2.65	6.13	
13:17	0.30	0.69	2.46	5.68	2.66	6.14	
13:18	0.31	0.71	2.46	5.68	2.66	6.14	
13:19	0.31	0.73	2.46	5.68	2.65	6.13	
13:20	0.32	0.73	2.46	5.68	2.66	6.14	
13:21	0.31	0.73	2.46	5.68	2.66	6.14	
13:22	0.32	0.74	2.46	5.68	2.66	6.14	
13:23	0.31	0.72	2.46	5.67	2.65	6.12	
13:24	0.30	0.69	2.46	5.68	2.66	6.14	
13:25	0.30	0.69	2.46	5.67	2.66	6.14	
13:26	0.31	0.73	2.46	5.68	2.65	6.13	
13:27	0.30	0.70	2.46	5.68	2.66	6.14	
13:28	0.29	0.67	2.46	5.67	2.66	6.13	
13:29	0.30	0.70	2.46	5.67	2.66	6.14	
13:30	0.31	0.72	2.46	5.68	2.66	6.15	
13:31	0.31	0.70	2.46	5.68	2.66	6.14	
13:32	0.30	0.68	2.46	5.67	2.65	6.13	
13:33	0.31	0.72	2.46	5.67	2.66	6.15	
13:34	0.31	0.72	2.46	5.67	2.66	6.14	
13:35	0.32	0.73	2.45	5.67	2.65	6.13	
13:36	0.32	0.73	2.45	5.67	2.66	6.14	
13:37	0.32	0.74	2.45	5.67	2.66	6.14	
13:38	0.33	0.77	2.45	5.67	2.66	6.13	
13:39	0.33	0.75	2.45	5.67	2.65	6.13	
13:40	0.33	0.75	2.45	5.67	2.66	6.15	
13:41	0.30	0.70	2.45	5.66	2.66	6.14	
13:42	0.33	0.77	2.45	5.66	2.65	6.13	
13:43	0.33	0.76	2.45	5.66	2.66	6.15	
13:44	0.37	0.85	2.45	5.66	2.66	6.14	
13:45	0.30	0.70	2.45	5.66	2.65	6.13	
13:46	0.33	0.75	2.45	5.66	2.66	6.14	
13:47	0.33	0.76	2.45	5.66	2.66	6.14	
13:48	0.32	0.73	2.45	5.66	2.66	6.14	
13:49	0.33	0.77	2.45	5.66	2.65	6.12	

Table 1 Step Test - December 16, 2019

Step Test - December 16, 2019 EXW-1 PZ-1 PZ-2							
			PZ				
	Depth	Depth	Depth	Depth	Depth	Depth	
	submerged	submerged	submerged	submerged	submerged	submerged	
Time	(psi)	(ft)	(psi)	(ft)	(psi)	(ft)	
13:50	0.33	0.77	2.45	5.66	2.66	6.14	
13:51	0.32	0.75	2.45	5.66	2.66	6.14	
13:52	0.31	0.73	2.45	5.66	2.65	6.13	
13:53	0.33	0.75	2.45	5.66	2.66	6.15	
13:54	0.34	0.77	2.45	5.66	2.66	6.14	
13:55	0.34	0.78	2.45	5.66	2.65	6.13	
13:56	0.34	0.79	2.45	5.66	2.66	6.14	
13:57	0.34	0.79	2.45	5.66	2.66	6.14	
13:58	0.33	0.77	2.45	5.65	2.66	6.14	
13:59	0.34	0.79	2.45	<mark>5.66</mark>	2.65	6.13	
14:00	0.33	0.77	2.45	5.65	2.66	6.14	
14:01	0.33	0.75	2.45	5.65	2.65	6.13	
14:02	0.33	0.76	2.45	5.65	2.65	6.12	
14:03	0.34	0.77	2.45	<mark>5.65</mark>	2.66	6.14	
14:04	0.32	0.75	2.45	5.65	2.66	6.14	
14:05	0.33	0.76	2.45	5.65	2.65	6.12	
14:06	0.33	0.77	2.45	5.65	2.65	6.13	
14:07	0.33	0.75	2.45	5.65	2.66	6.14	
14:08	0.32	0.74	2.45	5.65	2.65	6.12	
14:09	0.33	0.77	2.45	5.65	2.65	6.13	
14:10	0.34	0.78	2.45	5.65	2.66	6.14	
14:11	0.31	0.71	2.45	5.65	2.65	6.13	
14:12	0.30	0.70	2.44	5.65	2.65	6.11	
14:13	0.32	0.75	2.45	5.65	2.66	6.14	
14:14	0.32	0.74	2.44	5.65	2.65	6.13	
14:15	0.32	0.74	2.44	5.65	2.65	6.12	
14:16	0.32	0.75	2.45	5.65	2.65	6.13	
14:17	0.33	0.75	2.45	5.65	2.66	6.14	
14:18	0.32	0.75	2.44	5.64	2.65	6.13	
14:19	0.32	0.75	2.44	5.65	2.66	6.13	
14:20	0.33	0.77	2.44	5.65	2.66	6.14	
14:21	0.32	0.73	2.44	5.65	2.65	6.12	
14:22	0.33	0.75	2.44	5.64	2.65	6.12	
14:23	0.33	0.75	2.44	5.64	2.66	6.14	
14:24	0.32	0.74	2.44	5.64	2.65	6.13	
14:25	0.32	0.73	2.44	5.63	2.65	6.11	
14:26	0.34	0.78	2.44	5.64	2.65	6.13	
14:27	0.32	0.74	2.44	5.64	2.66	6.13	
14:28	0.32	0.74	2.44	5.65	2.65	6.13	
14:29	0.32	0.74	2.44	5.64	2.66	6.13	

Table 1 Step Test - December 16, 2019

Step Test - December 16, 2019           EXW-1         PZ-1         PZ-2							
	Depth	Depth	Depth	Depth	Depth	Depth	
	submerged	submerged	submerged	submerged	submerged	submerged	
Time	(psi)	(ft)	(psi)	(ft)	(psi)	(ft)	
14:30	0.34	0.79	2.45	5.65	2.66	6.14	
14:31	0.32	0.73	2.44	5.64	2.65	6.12	
14:32	0.31	0.72	2.44	5.64	2.66	6.14	
14:33	0.32	0.74	2.44	5.64	2.65	6.13	
14:34	0.33	0.76	2.44	5.64	2.65	6.12	
14:35	0.32	0.74	2.44	5.64	2.65	6.13	
14:36	0.34	0.77	2.44	5.64	2.66	6.14	
14:37	0.33	0.75	2.44	5.64	2.65	6.12	
14:38	0.32	0.74	2.44	5.64	2.65	6.12	
14:39	0.34	0.78	2.44	5.64	2.66	6.14	
14:40	0.33	0.76	2.44	5.64	2.65	6.13	
14:41	1.09	2.51	2.48	5.73	2.66	6.13	
14:42	1.20	2.77	2.49	5.74	2.67	6.16	
14:43	1.26	2.92	2.49	5.74	2.66	6.15	
14:44	1.32	3.05	2.49	5.75	2.66	6.14	
14:45	1.24	2.87	2.49	5.75	2.67	6.16	
14:46	1.22	2.81	2.49	5.75	2.66	6.15	
14:47	1.00	2.31	2.49	5.76	2.66	6.15	
14:48	0.16	0.38	2.45	5.65	2.65	6.12	
14:49	0.28	0.64	2.45	5.66	2.66	6.14	
14:50	0.34	0.79	2.45	5.67	2.65	6.13	
14:51	0.35	0.81	2.45	5.67	2.65	6.12	
14:52	0.34	0.79	2.45	5.66	2.66	6.14	
14:53	0.35	0.80	2.45	5.66	2.65	6.13	
14:54	0.36	0.83	2.45	5.66	2.65	6.12	
14:55	0.35	0.81	2.45	5.66	2.65	6.13	
14:56	0.32	0.75	2.45	5.66	2.66	6.13	
14:57	0.35	0.81	2.45	5.66	2.65	6.12	
14:58	0.34	0.78	2.45	5.66	2.65	6.12	
14:59	0.32	0.74	2.45	5.65	2.66	6.14	
15:00	0.32	0.75	2.45	5.65	2.65	6.13	
15:01	0.34	0.79	2.45	5.65	2.65	6.11	
15:02	0.32	0.74	2.45	5.65	2.66	6.14	
15:03	0.23	0.54	2.44	5.64	2.65	6.13	
15:04	0.20	0.46	2.44	5.64	2.65	6.12	
15:05	0.16	0.37	2.44	5.63	2.66	6.14	
15:06	0.14	0.33	2.44	5.63	2.65	6.13	
15:07	0.15	0.33	2.44	5.62	2.65	6.12	
15:08	0.13	0.30	2.43	5.62	2.65	6.13	
15:09	0.12	0.28	2.43	5.62	2.65	6.13	

Table 1 Step Test - December 16, 2019

Step Test - December 16, 2019										
	EXW-1		PZ-1		PZ-2					
	Depth	Depth	Depth	Depth	Depth	Depth				
	submerged	submerged	submerged	submerged	submerged	submerged				
Time	(psi)	(ft)	(psi)	(ft)	(psi)	(ft)				
15:10	0.11	0.26	2.43	5.62	2.65	6.12				
15:11	0.11	0.24	2.43	5.61	2.64	6.11				
15:12	0.11	0.26	2.43	5.61	2.65	6.13				
15:13	0.11	0.24	2.43	5.61	2.65	6.12				
15:14	0.12	0.27	2.43	5.61	2.65	6.11				
15:15	0.12	0.28	2.43	5.61	2.66	6.13				
15:16	0.11	0.26	2.43	5.61	2.65	6.12				
15:17	0.10	0.23	2.43	5.61	2.65	6.11				
15:18	0.17	0.40	2.43	5.61	2.65	6.12				
15:19	0.10	0.24	2.43	5.60	2.65	6.12				
15:20	0.09	0.21	2.43	5.60	2.65	6.12				
15:21	0.09	0.21	2.43	5.60	2.64	6.11				
15:22	0.08	0.19	2.42	5.60	2.65	6.13				
15:23	0.08	0.18	2.42	5.60	2.65	6.12				
15:24	0.09	0.21	2.42	5.60	2.64	6.11				
15:25	0.09	0.21	2.43	5.60	2.65	6.11				
15:26	0.09	0.21	2.42	5.60	2.65	6.12				
15:27	0.09	0.21	2.42	5.59	2.65	6.11				
15:28	0.12	0.27	2.42	5.60	2.65	6.12				
15:29	0.13	0.29	2.42	5.60	2.65	6.13				
15:30	0.11	0.26	2.42	5.59	2.65	6.11				
15:31	0.12	0.28	2.42	5.59	2.64	6.10				
15:32	0.13	0.30	2.42	5.59	2.65	6.12				
15:33	0.12	0.27	2.42	5.59	2.65	6.11				
15:34	0.11	0.26	2.42	5.59	2.64	6.11				
15:35	0.13	0.30	2.42	5.59	2.65	6.12				
15:36	0.12	0.27	2.42	5.59	2.65	6.11				
15:37	0.13	0.29	2.42	5.59	2.64	6.11				
15:38	0.14	0.32	2.42	5.59	2.65	6.12				
15:39	0.14	0.31	2.42	5.59	2.65	6.11				
15:40	0.11	0.26	2.42	5.58	2.64	6.11				
15:41	0.10	0.23	2.42	5.58	2.66	6.13				
15:42	0.09	0.20	2.42	5.58	2.65	6.12				
15:43	0.10	0.23	2.42	5.58	2.65	6.11				
15:44	0.10	0.22	2.42	5.58	2.65	6.12				
15:45	0.13	0.29	2.41	5.58	2.65	6.12				
15:46	0.12	0.27	2.42	5.58	2.65	6.11				
15:47	0.10	0.22	2.41	5.58	2.64	6.10				
15:48	0.08	0.19	2.42	5.58	2.65	6.13				
15:49	0.12	0.28	2.41	5.58	2.65	6.12				

Table 1 Step Test - December 16, 2019

Step Test - December 16, 2019 EXW-1 PZ-1 PZ-2										
			PZ-1		PZ-2					
	Depth	Depth	Depth	Depth	Depth	Depth				
	submerged	submerged	submerged	submerged	submerged	submerged				
Time	(psi)	(ft)	(psi)	(ft)	(psi)	(ft)				
15:50	0.07	0.17	2.41	5.57	2.64	6.10				
15:51	0.05	0.12	2.41	5.57	2.65	6.11				
15:52	0.07	0.17	2.41	5.57	2.65	6.12				
15:53	0.07	0.17	2.41	5.56	2.64	6.11				
15:54	0.07	0.15	2.41	5.56	2.65	6.11				
15:55	0.07	0.16	2.41	5.57	2.65	6.12				
15:56	0.07	0.17	2.41	5.57	2.65	6.11				
15:57	0.10	0.23	2.41	5.57	2.64	6.10				
15:58	0.08	0.18	2.41	5.57	2.65	6.12				
15:59	0.07	0.17	2.41	5.56	2.65	6.11				
16:00	0.09	0.22	2.41	5.56	2.64	6.10				
16:01	0.09	0.21	2.41	5.57	2.65	6.12				
16:02	0.09	0.21	2.41	5.56	2.65	6.11				
<b>16:03</b>	0.09	0.21	2.41	5.56	2.64	6.10				
16:04	0.09	0.20	2.41	5.56	2.65	6.11				
16:05	0.09	0.21	2.41	5.56	2.65	6.11				
16:06	0.13	0.31	2.41	5.57	2.64	6.11				
16:07	0.09	0.21	2.41	5.56	2.64	6.10				
16:08	0.11	0.24	2.41	5.56	2.65	6.12				
16:09	0.11	0.24	2.41	5.57	2.65	6.11				
16:10	0.11	0.26	2.41	5.56	2.64	6.10				
16:11	0.12	0.28	2.41	5.57	2.65	6.12				
16:12	0.11	0.25	2.41	5.56	2.65	6.11				
16:13	0.11	0.26	2.41	5.56	2.64	6.10				
16:14	0.14	0.33	2.41	5.56	2.64	6.11				
16:15	0.11	0.24	2.41	5.56	2.65	6.12				
16:16	0.09	0.21	2.41	5.56	2.64	6.11				
16:17	0.13	0.29	2.41	5.56	2.64	6.10				
16:18	0.10	0.22	2.41	5.56	2.65	6.12				
16:19	0.07	0.15	2.41	5.56	2.65	6.11				
16:20	0.10	0.23	2.41	5.56	2.64	6.10				
16:21	0.09	0.21	2.41	5.56	2.65	6.12				
16:22	0.10	0.23	2.41	5.56	2.65	6.11				
16:23	0.12	0.27	2.41	5.56	2.64	6.10				
16:24	0.10	0.24	2.41	5.56	2.65	6.11				
16:25	0.11	0.24	2.41	5.56	2.65	6.11				
16:26	0.11	0.24	2.41	5.56	2.64	6.11				
16:27	0.09	0.20	2.41	5.56	2.64	6.10				
16:28	0.08	0.19	2.41	5.56	2.65	6.12				
16:29	0.12	0.28	2.41	5.56	2.64	6.11				

Table 1 Step Test - December 16, 2019

Time(psi)(ft)(psi)(ft)(psi)(ft)16:300.110.242.415.562.646.1116:310.110.242.415.562.656.116:320.110.242.415.562.656.116:330.110.252.415.562.646.1116:340.080.192.415.562.646.116:350.100.242.415.562.646.116:360.090.212.415.562.646.116:370.110.262.415.562.646.116:380.110.252.415.562.646.116:390.100.242.415.562.646.116:400.120.272.415.562.646.116:410.130.292.415.562.646.116:420.100.222.415.562.646.116:430.090.212.415.562.646.116:440.090.202.405.552.646.116:450.080.192.405.552.646.116:460.110.222.415.562.646.116:470.000.222.415.562.646.116:480.090.222.415.562.646.116:490.12<		Step Test - December 16, 2019						
submerged Time         submerged (psi)         submerged (ft)         submerged (psi)         submerged (p								
Time(psi)(ft)(psi)(ft)(psi)(ft)16:300.110.242.415.562.646.1116:310.110.242.415.562.656.116:320.110.242.415.562.656.116:330.110.252.415.562.646.116:340.080.192.415.562.646.116:350.100.242.415.562.646.116:360.090.212.415.562.646.116:370.110.262.415.562.646.116:380.110.252.415.562.646.116:390.100.242.415.562.646.116:400.120.272.415.562.646.116:410.130.292.415.562.646.116:420.100.222.415.562.646.116:430.090.212.415.562.646.116:440.090.202.405.552.646.116:450.080.192.405.552.646.116:460.110.222.415.562.656.116:470.100.222.415.562.646.116:480.090.222.415.562.646.116:490.12 <t< th=""><th></th><th>-</th><th>Depth</th><th>Depth</th><th>Depth</th><th>Depth</th><th>Depth</th></t<>		-	Depth	Depth	Depth	Depth	Depth	
16:30 $0.11$ $0.24$ $2.41$ $5.56$ $2.64$ $6.11$ $16:31$ $0.11$ $0.24$ $2.41$ $5.56$ $2.65$ $6.1$ $16:32$ $0.11$ $0.24$ $2.41$ $5.56$ $2.65$ $6.1$ $16:33$ $0.11$ $0.25$ $2.41$ $5.56$ $2.64$ $6.1$ $16:34$ $0.08$ $0.19$ $2.41$ $5.56$ $2.64$ $6.1$ $16:35$ $0.10$ $0.24$ $2.41$ $5.56$ $2.64$ $6.1$ $16:36$ $0.09$ $0.21$ $2.41$ $5.56$ $2.64$ $6.1$ $16:37$ $0.11$ $0.26$ $2.41$ $5.56$ $2.64$ $6.1$ $16:38$ $0.11$ $0.25$ $2.41$ $5.56$ $2.64$ $6.1$ $16:39$ $0.10$ $0.24$ $2.41$ $5.56$ $2.64$ $6.1$ $16:40$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.1$ $16:40$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.1$ $16:40$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.1$ $16:40$ $0.09$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:42$ $0.09$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:44$ $0.09$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:45$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.1$ $16:46$ $0.11$ $0.22$ $2.41$ $5.56$ $2.64$ <td< td=""><td></td><td>submerged</td><td>submerged</td><td>submerged</td><td>submerged</td><td>submerged</td><td>submerged</td></td<>		submerged	submerged	submerged	submerged	submerged	submerged	
16:31 $0.11$ $0.24$ $2.41$ $5.56$ $2.65$ $6.1$ $16:32$ $0.11$ $0.24$ $2.41$ $5.56$ $2.64$ $6.11$ $16:33$ $0.11$ $0.25$ $2.41$ $5.56$ $2.64$ $6.1$ $16:34$ $0.08$ $0.19$ $2.41$ $5.56$ $2.64$ $6.1$ $16:35$ $0.10$ $0.24$ $2.41$ $5.56$ $2.64$ $6.1$ $16:35$ $0.10$ $0.24$ $2.41$ $5.56$ $2.64$ $6.1$ $16:36$ $0.09$ $0.21$ $2.41$ $5.56$ $2.64$ $6.1$ $16:37$ $0.11$ $0.26$ $2.41$ $5.56$ $2.64$ $6.1$ $16:39$ $0.10$ $0.24$ $2.41$ $5.56$ $2.64$ $6.1$ $16:39$ $0.10$ $0.24$ $2.41$ $5.56$ $2.64$ $6.1$ $16:40$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.1$ $16:40$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.1$ $16:42$ $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:43$ $0.09$ $0.20$ $2.40$ $5.55$ $2.64$ $6.1$ $16:44$ $0.09$ $0.20$ $2.40$ $5.55$ $2.64$ $6.1$ $16:45$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.1$ $16:46$ $0.11$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ <td< td=""><td>Time</td><td>(psi)</td><td>(ft)</td><td>(psi)</td><td>(ft)</td><td>(psi)</td><td>(ft)</td></td<>	Time	(psi)	(ft)	(psi)	(ft)	(psi)	(ft)	
16:32 $0.11$ $0.24$ $2.41$ $5.56$ $2.65$ $6.1$ $16:33$ $0.11$ $0.25$ $2.41$ $5.56$ $2.64$ $6.1$ $16:34$ $0.08$ $0.19$ $2.41$ $5.56$ $2.64$ $6.1$ $16:35$ $0.10$ $0.24$ $2.41$ $5.56$ $2.65$ $6.1$ $16:35$ $0.10$ $0.24$ $2.41$ $5.56$ $2.64$ $6.1$ $16:36$ $0.09$ $0.21$ $2.41$ $5.56$ $2.64$ $6.1$ $16:36$ $0.11$ $0.26$ $2.41$ $5.56$ $2.64$ $6.1$ $16:39$ $0.10$ $0.24$ $2.41$ $5.56$ $2.64$ $6.1$ $16:40$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.1$ $16:40$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.1$ $16:40$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.1$ $16:42$ $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:43$ $0.09$ $0.20$ $2.40$ $5.55$ $2.65$ $6.1$ $16:45$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.1$ $16:46$ $0.11$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.1$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.1$ $16:50$ $0.11$ $0.22$ $2.41$ $5.56$ $2.64$	16:30	0.11	0.24	2.41	5.56	2.64	6.10	
16:33 $0.11$ $0.25$ $2.41$ $5.56$ $2.64$ $6.11$ $16:34$ $0.08$ $0.19$ $2.41$ $5.56$ $2.64$ $6.1$ $16:35$ $0.10$ $0.24$ $2.41$ $5.56$ $2.65$ $6.1$ $16:36$ $0.09$ $0.21$ $2.41$ $5.56$ $2.64$ $6.1$ $16:37$ $0.11$ $0.26$ $2.41$ $5.56$ $2.64$ $6.1$ $16:38$ $0.11$ $0.25$ $2.41$ $5.56$ $2.64$ $6.1$ $16:39$ $0.10$ $0.24$ $2.41$ $5.56$ $2.64$ $6.1$ $16:40$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.1$ $16:40$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.1$ $16:42$ $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:43$ $0.09$ $0.21$ $2.41$ $5.56$ $2.64$ $6.0$ $16:44$ $0.09$ $0.20$ $2.40$ $5.55$ $2.64$ $6.1$ $16:45$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.1$ $16:46$ $0.11$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.1$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.1$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.1$ $16:49$ $0.12$ $0.27$ $2.40$ $5.55$ $2.64$ <td< td=""><td>16:31</td><td>0.11</td><td>0.24</td><td>2.41</td><td>5.56</td><td>2.65</td><td>6.12</td></td<>	16:31	0.11	0.24	2.41	5.56	2.65	6.12	
16:34 $0.08$ $0.19$ $2.41$ $5.56$ $2.64$ $6.1$ $16:35$ $0.10$ $0.24$ $2.41$ $5.56$ $2.65$ $6.1$ $16:36$ $0.09$ $0.21$ $2.41$ $5.56$ $2.64$ $6.11$ $16:37$ $0.11$ $0.26$ $2.41$ $5.56$ $2.64$ $6.11$ $16:38$ $0.11$ $0.25$ $2.41$ $5.56$ $2.64$ $6.11$ $16:39$ $0.10$ $0.24$ $2.41$ $5.56$ $2.64$ $6.11$ $16:40$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.11$ $16:40$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.11$ $16:42$ $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:43$ $0.09$ $0.21$ $2.41$ $5.56$ $2.64$ $6.11$ $16:44$ $0.09$ $0.20$ $2.40$ $5.55$ $2.64$ $6.11$ $16:45$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.11$ $16:46$ $0.11$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:48$ $0.09$ $0.22$ $2.40$ $5.55$ $2.64$ $6.11$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.11$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.11$ $16:50$ $0.11$ $0.22$ $2.40$ $5.55$ $2.64$ $6.1$ $16:51$ $0.16$ $0.36$ $2.41$ $5.56$	16:32	0.11	0.24	2.41	5.56	2.65	6.11	
16:35 $0.10$ $0.24$ $2.41$ $5.56$ $2.65$ $6.1$ $16:36$ $0.09$ $0.21$ $2.41$ $5.56$ $2.64$ $6.11$ $16:37$ $0.11$ $0.26$ $2.41$ $5.56$ $2.64$ $6.11$ $16:38$ $0.11$ $0.25$ $2.41$ $5.56$ $2.65$ $6.1$ $16:39$ $0.10$ $0.24$ $2.41$ $5.56$ $2.64$ $6.11$ $16:40$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.11$ $16:42$ $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:42$ $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:43$ $0.09$ $0.21$ $2.41$ $5.56$ $2.64$ $6.0$ $16:44$ $0.09$ $0.20$ $2.40$ $5.55$ $2.65$ $6.1$ $16:45$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.11$ $16:46$ $0.11$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:46$ $0.11$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.11$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.11$ $16:50$ $0.11$ $0.22$ $2.40$ $5.55$ $2.64$ $6.1$ $16:51$ $0.10$ $0.22$ $2.40$ $5.55$ $2.64$ $6.1$ $16:52$ $0.16$ $0.36$ $2.41$ $5.56$ $2.6$	16:33	0.11	0.25	2.41	5.56	2.64	6.10	
16:36 $0.09$ $0.21$ $2.41$ $5.56$ $2.64$ $6.11$ $16:37$ $0.11$ $0.26$ $2.41$ $5.56$ $2.65$ $6.11$ $16:38$ $0.11$ $0.25$ $2.41$ $5.56$ $2.65$ $6.11$ $16:39$ $0.10$ $0.24$ $2.41$ $5.56$ $2.64$ $6.11$ $16:40$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.11$ $16:42$ $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:43$ $0.09$ $0.21$ $2.41$ $5.56$ $2.64$ $6.01$ $16:44$ $0.09$ $0.20$ $2.40$ $5.55$ $2.65$ $6.1$ $16:45$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.11$ $16:46$ $0.11$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:45$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.11$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.11$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.11$ $16:50$ $0.11$ $0.22$ $2.40$ $5.55$ $2.64$ $6.11$ $16:51$ $0.10$ $0.22$ $2.41$ $5.56$ $2.65$ $6.11$ $16:52$ $0.16$ $0.36$ $2.41$ $5.55$ $2.64$ $6.11$ $16:55$ $0.12$ $0.27$ $2.40$ $5.55$ $2.64$ $6.11$ $16:55$ $0.12$ $0.27$ $2.40$ $5.55$ <td< td=""><td>16:34</td><td>0.08</td><td>0.19</td><td>2.41</td><td>5.56</td><td>2.64</td><td>6.11</td></td<>	16:34	0.08	0.19	2.41	5.56	2.64	6.11	
16:37 $0.11$ $0.26$ $2.41$ $5.56$ $2.64$ $6.11$ $16:38$ $0.11$ $0.25$ $2.41$ $5.56$ $2.65$ $6.1$ $16:39$ $0.10$ $0.24$ $2.41$ $5.56$ $2.64$ $6.11$ $16:40$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.11$ $16:41$ $0.13$ $0.29$ $2.41$ $5.56$ $2.64$ $6.11$ $16:42$ $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:43$ $0.09$ $0.21$ $2.41$ $5.56$ $2.64$ $6.01$ $16:44$ $0.09$ $0.20$ $2.40$ $5.55$ $2.65$ $6.11$ $16:45$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.11$ $16:46$ $0.11$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:47$ $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:48$ $0.09$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.11$ $16:50$ $0.11$ $0.22$ $2.40$ $5.55$ $2.64$ $6.11$ $16:51$ $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:52$ $0.16$ $0.36$ $2.41$ $5.55$ $2.64$ $6.11$ $16:53$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.11$ $16:55$ $0.12$ $0.27$ $2.40$ $5.55$ <td< td=""><td>16:35</td><td>0.10</td><td>0.24</td><td>2.41</td><td>5.56</td><td>2.65</td><td>6.11</td></td<>	16:35	0.10	0.24	2.41	5.56	2.65	6.11	
16:38 $0.11$ $0.25$ $2.41$ $5.56$ $2.65$ $6.1$ $16:39$ $0.10$ $0.24$ $2.41$ $5.56$ $2.64$ $6.11$ $16:40$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.1$ $16:41$ $0.13$ $0.29$ $2.41$ $5.56$ $2.64$ $6.1$ $16:42$ $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:43$ $0.09$ $0.21$ $2.41$ $5.56$ $2.64$ $6.0$ $16:44$ $0.09$ $0.20$ $2.40$ $5.55$ $2.65$ $6.1$ $16:45$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.1$ $16:46$ $0.11$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:47$ $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:48$ $0.09$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.1$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.1$ $16:50$ $0.11$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:51$ $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:52$ $0.16$ $0.36$ $2.41$ $5.55$ $2.64$ $6.1$ $16:55$ $0.12$ $0.27$ $2.40$ $5.55$ $2.64$ $6.1$ $16:55$ $0.12$ $0.27$ $2.40$ $5.55$ $2.64$ <td< td=""><td>16:36</td><td>0.09</td><td>0.21</td><td>2.41</td><td>5.56</td><td>2.64</td><td>6.10</td></td<>	16:36	0.09	0.21	2.41	5.56	2.64	6.10	
16:39 $0.10$ $0.24$ $2.41$ $5.56$ $2.64$ $6.11$ $16:40$ $0.12$ $0.27$ $2.41$ $5.56$ $2.65$ $6.1$ $16:41$ $0.13$ $0.29$ $2.41$ $5.56$ $2.65$ $6.1$ $16:42$ $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:43$ $0.09$ $0.21$ $2.41$ $5.56$ $2.64$ $6.00$ $16:44$ $0.09$ $0.20$ $2.40$ $5.55$ $2.65$ $6.1$ $16:45$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.11$ $16:46$ $0.11$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:47$ $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:48$ $0.09$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.11$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.11$ $16:50$ $0.11$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:50$ $0.11$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:52$ $0.16$ $0.36$ $2.41$ $5.55$ $2.64$ $6.11$ $16:55$ $0.12$ $0.27$ $2.40$ $5.55$ $2.64$ $6.11$ $16:55$ $0.12$ $0.27$ $2.40$ $5.55$ $2.64$ $6.11$ $16:56$ $0.07$ $0.16$ $2.40$ $5.55$	16:37	0.11	0.26	2.41	5.56	2.64	6.10	
16:40 $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.1$ $16:41$ $0.13$ $0.29$ $2.41$ $5.56$ $2.65$ $6.1$ $16:42$ $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:43$ $0.09$ $0.21$ $2.41$ $5.56$ $2.64$ $6.0$ $16:44$ $0.09$ $0.20$ $2.40$ $5.55$ $2.65$ $6.1$ $16:45$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.1$ $16:46$ $0.11$ $0.25$ $2.41$ $5.56$ $2.64$ $6.1$ $16:47$ $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:48$ $0.09$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.1$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.1$ $16:50$ $0.11$ $0.22$ $2.40$ $5.55$ $2.64$ $6.1$ $16:50$ $0.11$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:51$ $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:52$ $0.16$ $0.36$ $2.41$ $5.55$ $2.64$ $6.1$ $16:55$ $0.12$ $0.27$ $2.40$ $5.55$ $2.64$ $6.1$ $16:55$ $0.12$ $0.27$ $2.40$ $5.55$ $2.64$ $6.1$ $16:57$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$	16:38	0.11	0.25	2.41	5.56	2.65	6.12	
16:41 $0.13$ $0.29$ $2.41$ $5.56$ $2.65$ $6.1$ $16:42$ $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:43$ $0.09$ $0.21$ $2.41$ $5.56$ $2.64$ $6.0$ $16:44$ $0.09$ $0.20$ $2.40$ $5.55$ $2.65$ $6.1$ $16:45$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.1$ $16:46$ $0.11$ $0.25$ $2.41$ $5.56$ $2.64$ $6.1$ $16:46$ $0.11$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:47$ $0.10$ $0.22$ $2.41$ $5.56$ $2.65$ $6.1$ $16:48$ $0.09$ $0.22$ $2.40$ $5.55$ $2.64$ $6.1$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.1$ $16:50$ $0.11$ $0.24$ $2.40$ $5.55$ $2.64$ $6.1$ $16:50$ $0.11$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:50$ $0.11$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:50$ $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.1$ $16:54$ $0.09$ $0.20$ $2.40$ $5.55$ $2.64$ $6.1$ $16:55$ $0.12$ $0.27$ $2.40$ $5.55$ $2.64$ $6.1$ $16:56$ $0.07$ $0.16$ $2.40$ $5.55$ $2.64$ $6.1$ $16:57$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$	16:39	0.10	0.24	2.41	5.56	2.64	6.10	
16:42 $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:43$ $0.09$ $0.21$ $2.41$ $5.56$ $2.64$ $6.00$ $16:44$ $0.09$ $0.20$ $2.40$ $5.55$ $2.65$ $6.1$ $16:45$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.11$ $16:46$ $0.11$ $0.25$ $2.41$ $5.56$ $2.64$ $6.11$ $16:46$ $0.11$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:47$ $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:48$ $0.09$ $0.22$ $2.40$ $5.55$ $2.64$ $6.11$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.11$ $16:50$ $0.11$ $0.24$ $2.40$ $5.55$ $2.64$ $6.11$ $16:50$ $0.11$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:51$ $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:52$ $0.16$ $0.36$ $2.41$ $5.56$ $2.64$ $6.11$ $16:53$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.11$ $16:55$ $0.12$ $0.27$ $2.40$ $5.55$ $2.64$ $6.11$ $16:56$ $0.07$ $0.16$ $2.40$ $5.55$ $2.64$ $6.11$ $16:57$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.11$ $16:58$ $0.09$ $0.21$ $2.40$ $5.55$ <td< td=""><td>16:40</td><td>0.12</td><td>0.27</td><td>2.41</td><td>5.56</td><td>2.64</td><td>6.11</td></td<>	16:40	0.12	0.27	2.41	5.56	2.64	6.11	
16:43 $0.09$ $0.21$ $2.41$ $5.56$ $2.64$ $6.01$ $16:44$ $0.09$ $0.20$ $2.40$ $5.55$ $2.65$ $6.1$ $16:45$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.11$ $16:46$ $0.11$ $0.25$ $2.41$ $5.56$ $2.64$ $6.11$ $16:47$ $0.10$ $0.22$ $2.41$ $5.56$ $2.65$ $6.11$ $16:48$ $0.09$ $0.22$ $2.40$ $5.55$ $2.64$ $6.11$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.11$ $16:50$ $0.11$ $0.24$ $2.40$ $5.55$ $2.64$ $6.11$ $16:50$ $0.11$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:51$ $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:52$ $0.16$ $0.36$ $2.41$ $5.56$ $2.64$ $6.11$ $16:53$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.11$ $16:55$ $0.12$ $0.27$ $2.40$ $5.55$ $2.64$ $6.11$ $16:55$ $0.12$ $0.27$ $2.40$ $5.55$ $2.64$ $6.11$ $16:56$ $0.07$ $0.16$ $2.40$ $5.55$ $2.64$ $6.11$ $16:57$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.11$ $16:58$ $0.09$ $0.21$ $2.40$ $5.55$ $2.64$ $6.11$ $16:59$ $0.08$ $0.19$ $2.40$ $5.55$ <td< td=""><td>16:41</td><td>0.13</td><td>0.29</td><td>2.41</td><td>5.56</td><td>2.65</td><td>6.11</td></td<>	16:41	0.13	0.29	2.41	5.56	2.65	6.11	
16:44 $0.09$ $0.20$ $2.40$ $5.55$ $2.65$ $6.1$ $16:45$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.11$ $16:46$ $0.11$ $0.25$ $2.41$ $5.56$ $2.64$ $6.11$ $16:47$ $0.10$ $0.22$ $2.41$ $5.56$ $2.65$ $6.11$ $16:48$ $0.09$ $0.22$ $2.40$ $5.55$ $2.64$ $6.11$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.11$ $16:50$ $0.11$ $0.24$ $2.40$ $5.55$ $2.64$ $6.11$ $16:50$ $0.11$ $0.24$ $2.40$ $5.55$ $2.64$ $6.11$ $16:51$ $0.10$ $0.22$ $2.41$ $5.56$ $2.65$ $6.11$ $16:52$ $0.16$ $0.36$ $2.41$ $5.56$ $2.64$ $6.11$ $16:53$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.11$ $16:54$ $0.09$ $0.20$ $2.40$ $5.55$ $2.64$ $6.11$ $16:55$ $0.12$ $0.27$ $2.40$ $5.55$ $2.64$ $6.11$ $16:56$ $0.07$ $0.16$ $2.40$ $5.55$ $2.64$ $6.11$ $16:57$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.11$ $16:58$ $0.09$ $0.21$ $2.40$ $5.55$ $2.64$ $6.11$ $16:59$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.11$ $16:59$ $0.08$ $0.19$ $2.40$ $5.55$ <td< td=""><td>16:42</td><td>0.10</td><td>0.22</td><td>2.41</td><td>5.56</td><td>2.64</td><td>6.10</td></td<>	16:42	0.10	0.22	2.41	5.56	2.64	6.10	
16:45 $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.11$ $16:46$ $0.11$ $0.25$ $2.41$ $5.56$ $2.64$ $6.11$ $16:47$ $0.10$ $0.22$ $2.41$ $5.56$ $2.65$ $6.11$ $16:48$ $0.09$ $0.22$ $2.40$ $5.55$ $2.64$ $6.11$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.11$ $16:50$ $0.11$ $0.24$ $2.40$ $5.55$ $2.64$ $6.11$ $16:51$ $0.10$ $0.22$ $2.41$ $5.56$ $2.64$ $6.11$ $16:52$ $0.16$ $0.36$ $2.41$ $5.56$ $2.64$ $6.11$ $16:53$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.07$ $16:54$ $0.09$ $0.20$ $2.40$ $5.55$ $2.64$ $6.11$ $16:55$ $0.12$ $0.27$ $2.40$ $5.55$ $2.64$ $6.11$ $16:56$ $0.07$ $0.16$ $2.40$ $5.55$ $2.64$ $6.11$ $16:56$ $0.07$ $0.16$ $2.40$ $5.55$ $2.64$ $6.11$ $16:57$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.11$ $16:58$ $0.09$ $0.21$ $2.40$ $5.55$ $2.64$ $6.11$ $16:59$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.11$	16:43	0.09	0.21	2.41	5.56	2.64	<mark>6.09</mark>	
16:46 $0.11$ $0.25$ $2.41$ $5.56$ $2.64$ $6.11$ $16:47$ $0.10$ $0.22$ $2.41$ $5.56$ $2.65$ $6.11$ $16:48$ $0.09$ $0.22$ $2.40$ $5.55$ $2.64$ $6.11$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.11$ $16:50$ $0.11$ $0.24$ $2.40$ $5.55$ $2.64$ $6.11$ $16:51$ $0.10$ $0.22$ $2.41$ $5.56$ $2.65$ $6.11$ $16:52$ $0.16$ $0.36$ $2.41$ $5.56$ $2.64$ $6.11$ $16:53$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.00$ $16:54$ $0.09$ $0.20$ $2.40$ $5.55$ $2.64$ $6.11$ $16:55$ $0.12$ $0.27$ $2.40$ $5.55$ $2.64$ $6.11$ $16:56$ $0.07$ $0.16$ $2.40$ $5.55$ $2.64$ $6.11$ $16:57$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.11$ $16:58$ $0.09$ $0.21$ $2.40$ $5.55$ $2.64$ $6.11$ $16:59$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.11$ $16:59$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.11$ $16:59$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.11$	16:44	0.09	0.20	2.40	5.55	2.65	6.11	
16:47 $0.10$ $0.22$ $2.41$ $5.56$ $2.65$ $6.1$ $16:48$ $0.09$ $0.22$ $2.40$ $5.55$ $2.64$ $6.1$ $16:49$ $0.12$ $0.27$ $2.41$ $5.56$ $2.64$ $6.1$ $16:50$ $0.11$ $0.24$ $2.40$ $5.55$ $2.64$ $6.1$ $16:51$ $0.10$ $0.22$ $2.41$ $5.56$ $2.65$ $6.1$ $16:52$ $0.16$ $0.36$ $2.41$ $5.56$ $2.64$ $6.1$ $16:53$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.1$ $16:54$ $0.09$ $0.20$ $2.40$ $5.55$ $2.64$ $6.1$ $16:55$ $0.12$ $0.27$ $2.40$ $5.55$ $2.64$ $6.1$ $16:56$ $0.07$ $0.16$ $2.40$ $5.55$ $2.64$ $6.1$ $16:57$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.1$ $16:58$ $0.09$ $0.21$ $2.40$ $5.55$ $2.64$ $6.1$ $16:59$ $0.08$ $0.19$ $2.40$ $5.55$ $2.64$ $6.1$	16:45	0.08	0.19	2.40	5.55	2.64	6.10	
16:480.090.222.405.552.646.116:490.120.272.415.562.646.116:500.110.242.405.552.646.116:510.100.222.415.562.656.116:520.160.362.415.562.646.116:530.080.192.405.552.646.016:540.090.202.405.552.646.116:550.120.272.405.552.646.116:560.070.162.405.552.646.116:570.080.192.405.552.646.116:580.090.212.405.552.646.116:590.080.192.405.552.646.1	16:46	0.11	0.25	2.41	5.56	2.64	6.10	
16:490.120.272.415.562.646.116:500.110.242.405.552.646.116:510.100.222.415.562.656.116:520.160.362.415.562.646.116:530.080.192.405.552.646.016:540.090.202.405.552.646.116:550.120.272.405.552.646.116:560.070.162.405.552.646.116:570.080.192.405.552.646.116:580.090.212.405.552.646.116:590.080.192.405.552.646.1	16:47	0.10	0.22	2.41	5.56	2.65	6.12	
16:500.110.242.405.552.646.116:510.100.222.415.562.656.116:520.160.362.415.562.646.116:530.080.192.405.552.646.016:540.090.202.405.552.646.116:550.120.272.405.552.646.116:560.070.162.405.552.646.016:570.080.192.405.552.646.116:580.090.212.405.552.646.116:590.080.192.405.552.646.1	16:48	0.09	0.22	2.40	5.55	2.64	6.11	
16:51         0.10         0.22         2.41         5.56         2.65         6.1           16:52         0.16         0.36         2.41         5.56         2.64         6.1           16:53         0.08         0.19         2.40         5.55         2.64         6.0           16:54         0.09         0.20         2.40         5.55         2.64         6.1           16:55         0.12         0.27         2.40         5.55         2.64         6.1           16:55         0.12         0.27         2.40         5.55         2.64         6.1           16:56         0.07         0.16         2.40         5.55         2.64         6.1           16:57         0.08         0.19         2.40         5.55         2.64         6.1           16:57         0.08         0.19         2.40         5.55         2.64         6.1           16:58         0.09         0.21         2.40         5.55         2.64         6.1           16:59         0.08         0.19         2.40         5.55         2.64         6.1	16:49	0.12	0.27	2.41	5.56	2.64	6.10	
16:52         0.16         0.36         2.41         5.56         2.64         6.1           16:53         0.08         0.19         2.40         5.55         2.64         6.0           16:54         0.09         0.20         2.40         5.55         2.64         6.1           16:55         0.12         0.27         2.40         5.55         2.64         6.1           16:55         0.12         0.27         2.40         5.55         2.64         6.1           16:56         0.07         0.16         2.40         5.55         2.64         6.0           16:57         0.08         0.19         2.40         5.55         2.64         6.1           16:57         0.08         0.19         2.40         5.55         2.64         6.1           16:58         0.09         0.21         2.40         5.55         2.64         6.1           16:59         0.08         0.19         2.40         5.55         2.64         6.1	16:50	0.11	0.24	2.40	5.55	2.64	6.11	
16:530.080.192.405.552.646.016:540.090.202.405.552.646.116:550.120.272.405.552.646.116:560.070.162.405.552.646.016:570.080.192.405.552.656.116:580.090.212.405.552.646.116:590.080.192.405.552.646.1	16:51	0.10	0.22	2.41	5.56	2.65	6.11	
16:540.090.202.405.552.646.116:550.120.272.405.552.646.116:560.070.162.405.552.646.016:570.080.192.405.552.656.116:580.090.212.405.552.646.116:590.080.192.405.552.646.1	16:52	0.16	0.36	2.41	5.56	2.64	6.11	
16:55         0.12         0.27         2.40         5.55         2.64         6.1           16:56         0.07         0.16         2.40         5.55         2.64         6.0           16:57         0.08         0.19         2.40         5.55         2.65         6.1           16:58         0.09         0.21         2.40         5.55         2.64         6.1           16:59         0.08         0.19         2.40         5.55         2.64         6.1	16:53	0.08	0.19	2.40	5.55	2.64	6.09	
16:56         0.07         0.16         2.40         5.55         2.64         6.07           16:57         0.08         0.19         2.40         5.55         2.65         6.1           16:58         0.09         0.21         2.40         5.55         2.64         6.1           16:59         0.08         0.19         2.40         5.55         2.64         6.1	16:54	0.09	0.20	2.40	5.55	2.64	<mark>6</mark> .11	
16:57         0.08         0.19         2.40         5.55         2.65         6.1           16:58         0.09         0.21         2.40         5.55         2.64         6.1           16:59         0.08         0.19         2.40         5.55         2.64         6.1	16:55	0.12	0.27	2.40	5.55	2.64	6.11	
16:58         0.09         0.21         2.40         5.55         2.64         6.10           16:59         0.08         0.19         2.40         5.55         2.64         6.10	16:56	0.07	0.16	2.40	5.55	2.64	6.09	
16:59 0.08 0.19 2.40 5.55 2.64 6.1	16:57	0.08	0.19	2.40	5.55	2.65	6.11	
	16:58	0.09	0.21	2.40	5.55	2.64	6.10	
17:00 0.07 0.17 2.40 5.55 2.64 6.1	16:59	0.08	0.19	2.40	5.55	2.64	6.10	
	17:00	0.07	0.17	2.40	5.55	2.64	6.11	

Table 1 Step Test - December 16, 2019

Inlet vacuum (inches of Hg) : 10:30 -12:30 ~ 7" , 12:30 to 15:00 ~ 9", 15:00 to 17:00 ~ 13"

	EXV		um Test - Dec	-1	PZ-2	
	Depth	Depth	Depth	Depth	Depth	-z Depth
	submerged	submerged	submerged	submerged	submerged	submerged
Time	(psi)	(ft)	(psi)	(ft)	(psi)	(ft)
7:55	1.15	2.67	2.60	6.02	2.66	6.15
7:56	0.35	0.80	2.58	5.95	2.66	6.14
7:57	0.28	0.64	2.57	5.94	2.65	6.12
7:58	0.23	0.53	2.57	5.95	2.65	6.13
7:59	0.25	0.57	2.56	5.92	2.66	6.13
8:00	0.22	0.50	2.56	5.91	2.65	6.12
8:01	0.20	0.46	2.56	5.90	2.65	6.12
8:02	0.20	0.46	2.55	5.90	2.65	6.13
8:03	0.23	0.53	2.55	5.89	2.65	6.12
8:04	0.21	0.48	2.55	5.88	2.64	6.11
8:05	0.21	0.48	2.55	5.88	2.65	6.13
8:06	0.19	0.44	2.54	5.87	2.65	6.12
8:07	0.20	0.46	2.54	5.87	2.65	6.11
8:08	0.22	0.50	2.54	5.86	2.65	6.12
8:09	0.22	0.50	2.54	5.86	2.65	6.12
8:10	0.37	0.86	2.53	5.85	2.65	6.11
8:11	0.21	0.48	2.53	5.85	2.65	6.12
8:12	0.20	0.46	2.53	5.84	2.65	6.12
8:13	0.23	0.53	2.53	5.85	2.65	6.12
8:14	0.21	0.48	2.53	5.83	2.64	6.11
8:15	0.20	0.46	2.53	5.83	2.65	6.13
8:16	0.21	0.48	2.52	5.83	2.65	6.12
8:17	0.21	0.48	2.52	5.82	2.65	6.11
8:18	0.23	0.54	2.52	5.82	2.65	6.12
8:19	0.22	0.51	2.52	5.82	2.65	6.12
8:20	0.21	0.49	2.52	5.81	2.65	6.11
8:21	0.22	0.51	2.51	5.81	2.64	6.10
8:22	0.25	0.58	2.51	5.81	2.65	6.13
8:23	0.24	0.56	2.51	5.80	2.65	6.11
8:24	0.23	0.53	2.51	5.80	2.64	6.11
8:25	0.22	0.52	2.51	5.80	2.65	6.13
8:26	0.21	0.47	2.51	5.79	2.65	6.11
8:27	0.25	0.58	2.51	5.79	2.65	6.11
8:28	0.24	0.56	2.50	5.78	2.65	6.11
8:29	0.24	0.55	2.50	5.78	2.65	6.12
8:30	0.24	0.54	2.50	5.78	2.65	6.11
8:31	0.23	0.53	2.50	5.78	2.64	6.11
8:32	0.25	0.58	2.50	5.78	2.65	6.12
8:33	0.28	0.65	2.50	5.78	2.65	6.11
8:34	0.25	0.58	2.50	5.77	2.64	6.11

Table 2Constant Vaccuum Test - December 17, 2019

EXW-1			PZ-1		PZ-2	
	Depth	Depth	Depth	Depth	Depth	-z Depth
	submerged	submerged	submerged	submerged	submerged	submerged
Time	(psi)	(ft)	(psi)	(ft)	(psi)	(ft)
8:35	0.24	0.56	2.50	5.76	2.65	6.11
8:36	0.26	0.59	2.49	5.76	2.65	6.12
8:37	0.26	0.61	2.49	5.76	2.65	6.11
8:38	0.27	0.63	2.49	5.76	2.64	6.10
8:39	0.26	0.60	2.49	5.76	2.65	6.11
8:40	0.25	0.58	2.49	5.75	2.64	6.10
8:41	0.27	0.62	2.49	5.75	2.65	6.11
8:42	0.26	0.59	2.49	5.74	2.65	6.11
8:43	0.25	0.59	2.49	5.74	2.64	6.11
8:44	0.25	0.58	2.49	5.74	2.64	6.10
8:45	0.24	0.54	2.48	5.74	2.65	6.12
8:46	0.26	0.60	2.48	5.74	2.65	6.11
8:47	0.25	0.58	2.48	5.74	2.64	6.10
8:48	0.25	0.59	2.48	5.73	2.64	6.11
8:49	0.26	0.59	2.48	5.73	2.65	6.11
8:50	0.26	0.60	2.48	5.73	2.64	6.11
8:51	0.27	0.62	2.48	5.73	2.64	6.09
8:52	0.26	<mark>0.6</mark> 1	2.48	5.73	2.65	6.12
8:53	0.25	0.58	2.48	5.73	2.64	6.11
8:54	0.26	0.60	2.48	5.72	2.64	6.10
8:55	0.26	0.60	2.48	5.73	2.65	6.11
8:56	0.24	0.55	2.48	5.72	2.65	6.11
8:57	0.23	0.54	2.48	5.72	2.64	6.10
8:58	0.22	0.51	2.48	5.72	2.64	6.09
8:59	0.25	0.59	2.48	5.72	2.65	6.11
9:00	0.27	0.62	2.47	5.71	2.64	6.11
9:01	0.25	0.57	2.47	5.71	2.64	6.09
9:02	0.24	0.55	2.47	5.71	2.65	6.11
9:03	0.25	0.57	2.47	5.71	2.65	6.11
9:04	0.23	0.54	2.47	5.71	2.64	6.09
9:05	0.28	0.65	2.47	5.71	2.65	6.12
9:06	0.32	0.74	2.47	5.71	2.64	6.11
9:07	0.27	0.62	2.47	5.71	2.64	6.10
9:08	0.21	0.48	2.47	5.70	2.64	6.10
9:09	0.22	0.50	2.47	5.70	2.65	6.11
9:10 0:11	0.23	0.52	2.47	5.70	2.64	6.11
9:11	0.25	0.57	2.47	5.70	2.64	6.10
9:12	0.19	0.43	2.47	5.70	2.65	6.11
9:13	0.20	0.46	2.47	5.70	2.65	6.11
9:14	0.25	0.59	2.47	5.70	2.64	6.10

Table 2Constant Vaccuum Test - December 17, 2019

	EXW-1		um Test - Dec PZ	,	PZ-2	
L,	Depth	Depth	Depth	Depth	Depth	-2 Depth
	submerged	submerged	submerged	submerged	submerged	submerged
Time	(psi)	(ft)	(psi)	(ft)	(psi)	(ft)
9:15	0.28	0.66	2.47	5.70	2.64	6.11
9:16	0.23	0.53	2.46	5.69	2.65	6.11
9:17	0.20	0.46	2.46	5.69	2.64	6.10
9:18	0.19	0.43	2.46	5.69	2.64	6.09
9:19	0.20	0.47	2.46	5.69	2.65	6.11
9:20	0.17	0.40	2.46	5.68	2.64	6.11
9:21	0.17	0.39	2.46	5.68	2.64	6.09
9:22	0.15	0.35	2.46	5.68	2.64	6.10
9:23	0.19	0.43	2.46	5.68	2.64	6.11
9:24	0.18	0.41	2.46	5.68	2.64	6.09
9:25	0.17	0.39	2.46	5.68	2.64	6.10
9:26	0.17	0.40	2.46	5.68	2.65	6.11
9:27	0.19	0.43	2.46	5.68	2.64	6.10
9:28	0.17	0.40	2.46	5.67	2.64	6.09
9:29	0.16	0.37	2.46	5.67	2.64	6.11
9:30	0.16	0.36	2.45	5.67	2.64	6.10
9:31	0.20	0.47	2.46	5.67	2.64	<mark>6.0</mark> 9
9:32	0.19	0.43	2.46	5.67	2.64	6.10
<mark>9:3</mark> 3	0.17	0.39	2.45	5.67	2.64	6.11
9:34	0.16	0.37	2.45	5.67	2.64	6.10
9:35	0.19	0.43	2.45	5.67	2.64	6.09
9:36	0.16	0.38	2.45	5.66	2.64	6.11
9:37	0.17	0.39	2.45	5.66	2.64	6.10
9:38	0.18	0.42	2.45	5.67	2.64	6.09
9:39	0.20	0.46	2.45	5.66	2.64	6.10
9:40	0.18	0.42	2.45	5.66	2.64	6.10
9:41	0.18	0.40		5.66		6.09
9:42	0.20	0.46	2.45	5.66	2.64	6.09
9:43	0.18	0.42	2.45	5.65	2.64	6.09
9:44	0.18	0.41	2.45	5.65	2.64	6.09
9:45	0.16	0.37	2.45	5.66	2.64	6.10
9:46	0.20	0.45	2.45	5.66	2.64	6.10
9:47	0.17	0.39	2.45	5.65	2.64	6.09
9:48	0.15	0.36	2.45	5.65	2.63	6.08
9:49	0.15	0.35	2.45	5.65	2.64	6.10
9:50	0.19	0.44	2.45	5.65	2.64	6.09
9:51	0.16	0.37	2.45	5.65	2.64	6.09
9:52	0.16	0.36	2.45	5.65	2.64	6.10
9:53	0.18	0.42	2.45	5.65	2.64	6.10
9:54	0.21	0.49	2.45	5.65	2.63	6.08

Table 2Constant Vaccuum Test - December 17, 2019

<b></b>	EXW-1		PZ-1		PZ-2	
	Depth	Depth	Depth	Depth	Depth	-2 Depth
	submerged	submerged	submerged	submerged	submerged	submerged
Time	(psi)	(ft)	(psi)	(ft)	(psi)	(ft)
9:55	0.14	0.32	2.45	5.65	2.64	6.09
9:56	0.10	0.24	2.45	5.65	2.64	6.10
9:57	0.14	0.33	2.44	5.64	2.64	6.09
9:58	0.14	0.31	2.44	5.64	2.63	6.08
9:59	0.12	0.27	2.45	5.65	2.64	6.10
10:00	0.12	0.28	2.44	5.64	2.64	6.09
10:01	0.16	0.37	2.44	5.64	2.63	6.08
10:02	0.12	0.28	2.44	5.64	2.64	6.11
10:03	0.13	0.30	2.44	5.63	2.64	6.09
10:04	0.15	0.35	2.44	5.63	2.63	6.08
10:05	0.14	0.33	2.44	5.63	2.64	6.11
10:06	0.13	0.29	2.44	5.63	2.64	6.10
10:07	0.16	0.37	2.44	5.63	2.63	6.08
10:08	0.22	0.50	2.44	5.64	2.64	6.10
10:09	0.22	0.52	2.44	5.64	2.64	6.10
10:10	0.24	0.56	2.44	5. <del>6</del> 4	2.64	6.09
10:11	0.26	0.59	2.44	5.64	2.63	6.08
10:12	0.25	0.57	2.44	5.64	2.64	6.10
10:13	0.21	0.49	2.44	5.63	2.64	6.09
10:14	0.21	0.47	2.44	5.63	2.63	6.08
10:15	0.22	0.51	2.44	5.63	2.64	6.09
10:16	0.21	0.48	2.44	5.63	2.64	6.09
10:17	0.20	0.46	2.44	5.63	2.63	6.08
10:18	0.19	0.45	2.44	5.62	2.64	6.09
10:19	0.23	0.53	2.44	5.63	2.64	6.10
10:20	0.20	0.46	2.44	5.63	2.64	6.09
10:21	0.20	0.45			2.63	6.08
10:22	0.20	0.45	2.44	5.62	2.64	6.10
10:23	0.22	0.50	2.44	5.62	2.64	6.09
10:24	0.20	0.46	2.44	5.63	2.63	6.08
10:25	0.18	0.41	2.43	5.62	2.64	6.09
10:26	0.20	0.45	2.44	5.62	2.64	6.10
10:27	0.20	0.46	2.43	5.62	2.64	6.09
10:28	0.18	0.42	2.43	5.62	2.63	6.07
10:29	0.17	0.39	2.43	5.62	2.64	6.10
10:30	0.22	0.50	2.44	5.62	2.64	6.09
10:31	0.17	0.39	2.43	5.62	2.63	6.08
10:32	0.14	0.32	2.43	5.62	2.64	6.10
10:33	0.14	0.32	2.43	5.62	2.64	6.09
10:34	0.19	0.43	2.43	5.62	2.63	6.08

Table 2Constant Vaccuum Test - December 17, 2019

	EXW-1		PZ-1		PZ-2	
<b></b> ,	Depth	Depth	Depth	Depth	Depth	Depth
	submerged	submerged	submerged	submerged	submerged	submerged
Time	(psi)	(ft)	(psi)	(ft)	(psi)	(ft)
10:35	(0.14	0.33	2.43	5.61	2.64	6.09
10:35	0.14	0.35	2.43	5.61	2.64	6.09
10:30	0.13	0.33	2.43	5.62	2.63	6.08
10:37	0.13	0.42	2.43	5.62	2.63	6.08
10:38	0.17	0.39	2.43	5.61	2.64	6.09
10:39	0.15	0.30	2.43	5.61	2.64	6.09
10:40	0.13	0.34	2.43	5.62	2.63	6.08
10:41	0.20	0.40	2.43	5.61	2.64	6.10
10:42	0.15	0.38	2.43	5.61	2.64	6.09
	0.13	0.34	2.43		2.64	
10:44 10:45	0.18	0.41	2.43	5.61 5.61	2.63	6.08 6.09
10:45	0.17		2.43	5.61	2.64	6.09
10:48	0.18	0.40 0.35	2.43	5.61	2.64	6.09
10:47	0.15	0.35	2.43	5.61	2.63	6.08
10:48	0.19	0.43	2.43	5.61	2.64	6.10
10:49	0.18	0.40	2.43	5.61	2.64	6.09
10:50	0.17	0.40	2.43	5.61	2.63	6.08
10:51	0.20	0.43	2.43	5.61	2.63	6.08
10:52	0.21	0.48	2.43	5.61	2.64	6.09
10:53	0.19		2.43		2.64	6.09
10:54	0.20	0.46 0.42	2.43	5.60 5.61	2.63	6.10
10:55	0.18				2.64	6.09
10:56	0.12	0.29 0.22	2.43 2.42	5.60 5.59	2.64	6.09
	0.10			5.59		
10:58 10:59	0.11	0.26 0.28	2.42 2.42	5.60	2.64 2.63	6.09 6.08
10.39	0.12	0.28	2.42	5.60	2.63	6.08
11:01 11:02	0.12	0.27	2.42	5.60 5.59	2.64 2.63	6.10 6.08
11:02	0.13	0.33	2.42	5.60		6.08
11:03	0.14	0.32	2.42	5.59	2.63	6.08
11:04	0.15	0.29	2.42	5.60	2.63	6.08
11:05	0.16	0.38	2.42	5.60	2.63	6.08
11:00	0.16	0.37	2.42	5.60	2.63	6.08
11:07	0.18	0.58	2.43	5.60	2.63	6.08
11:08	0.23	0.54	2.43	5.61	2.64	6.09
11:09	0.24	0.55	2.43	5.61	2.64	6.09
11:10	0.23	0.57	2.43	5.60	2.63	6.08
11:11	0.22	0.52	2.43	5.60	2.63	6.08
11:13	0.24	0.55	2.43	5.60	2.63	6.08
11:14	0.22	0.52	2.43	5.60	2.64	6.09

Table 2Constant Vaccuum Test - December 17, 2019

EXW-1		um Test - Dec	-1	PZ-2		
	Depth	Depth	Depth	Depth	Depth	-z Depth
	submerged	submerged	submerged	submerged	submerged	submerged
Time	(psi)	(ft)	(psi)	(ft)	(psi)	(ft)
11:15	0.22	0.51	2.43	5.60	2.64	6.09
11:15	0.22	0.51	2.43	5.60	2.63	6.08
11:10	0.24	0.50	2.43	5.60	2.63	6.07
11:18	0.21	0.48	2.42	5.60	2.64	6.10
11:19	0.21	0.48	2.43	5.60	2.64	6.09
11:20	0.24	0.55	2.43	5.61	2.63	6.08
11:21	0.22	0.50	2.42	5.60	2.63	6.08
11:22	0.20	0.46	2.43	5.60	2.64	6.09
11:23	0.22	0.50	2.43	5.60	2.63	6.08
11:24	0.23	0.52	2.42	5.60	2.63	6.07
11:25	0.21	0.49	2.42	5.59	2.64	6.09
11:26	0.20	0.46	2.42	5.59	2.63	6.08
11:27	0.23	0.53	2.42	5.60	2.63	6.07
11:28	0.23	0.54	2.43	5.60	2.64	6.10
11:29	0.21	0.48	2.42	5.60	2.64	6.09
11:30	0.21	0.48	2.42	5.60	2.63	6.08
11:31	0.24	0.54	2.43	5.60	2.64	6.09
11:32	0.19	0.44	2.42	5.60	2.64	<mark>6.09</mark>
11:33	0.18	0.42	2.42	5.60	2.63	<mark>6.08</mark>
11:34	0.21	0.49	2.42	5.60	2.63	6.07
11:35	0.20	0.45	2.42	5.60	2.64	6.09
11:36	0.18	0.41	2.42	5.59	2.63	6.08
11:37	0.21	0.49	2.42	5.59	2.63	6.07
11:38	0.28	0.65	2.43	5.60	2.64	6.10
11:39	0.21	0.49	2.42	5.60	2.64	6.09
11:40	0.19	0.44	2.42	5.60	2.63	6.08
11:41	0.20	0.46	2.42	5.59	2.63	<mark>6.08</mark>
11:42	0.23	0.54	2.42	5.60	2.64	<mark>6.09</mark>
11:43	0.20	0.45	2.42	5.59	2.63	6.08
11:44	0.18	0.42	2.42	5.59	2.63	6.07
11:45	0.22	0.52	2.42	5.60	2.64	6.10
11:46	0.18	0.43	2.42	5.59	2.63	6.08
11:47	0.17	0.39	2.42	5.59	2.63	6.08
11:48	0.16	0.38	2.42	5.59	2.63	6.08
11:49	0.20	0.45	2.42	5.59	2.64	<mark>6.0</mark> 9
11:50	0.15	0.35	2.42	5.59	2.63	<mark>6.07</mark>
11:51	0.15	0.33	2.42	5.59	2.64	6.09
11:52	0.17	0.39	2.42	5.59	2.63	6.08
11:53	0.17	0.38	2.42	5.59		6.07
11:54	0.11	0.26	2.42	5.58	2.63	6.08

Table 2Constant Vaccuum Test - December 17, 2019

	EXW-1		PZ-1		PZ-2	
L	Depth	Depth	Depth	Depth	Depth	Depth
	submerged	submerged	submerged	submerged	submerged	submerged
Time	(psi)	(ft)	(psi)	(ft)	(psi)	(ft)
11:55	0.12	0.27	2.42	5.58	2.63	6.08
11:55	0.26	0.61	2.42	5.59	2.63	6.08
11:57	0.12	0.27	2.42	5.58	2.63	6.08
11:58	0.10	0.24	2.42	5.58	2.63	6.08
11:59	0.16	0.38	2.42	5.59	2.63	6.08
12:00	0.11	0.26	2.42	5.58	2.63	6.07
12:01	0.08	0.19	2.41	5.58	2.64	6.09
12:02	0.10	0.22	2.41	5.57	2.63	6.08
12:03	0.11	0.24	2.41	5.58	2.63	6.07
12:04	0.08	0.19	2.41	5.57	2.64	6.09
12:05	0.10	0.22	2.41	5.58	2.63	6.08
12:06	0.15	0.33	2.41	5.58	2.63	6.07
12:07	0.10	0.23	2.41	5.57	2.64	6.09
12:08	0.08	0.19	2.41	5.57	2.63	6.08
12:09	0.12	0.27	2.41	5.57	2.63	6.07
12:10	0.13	0.29	2.41	5.57	2.63	6.07
12:11	0.08	0.18	2.41	5.57	2.63	6.08
12:12	0.08	0.19	2.41	5.57	2.63	6.08
12:13	0.09	0.20	2.41	5.57	2.63	6.06
12:14	0.08	0.19	2.41	5.56	2.64	6.09
12:15	0.08	0.18	2.41	5.56	2.63	6.08
12:16	0.14	0.33	2.41	5.58	2.63	6.07
12:17	0.12	0.27	2.41	5.57	2.64	6.09
12:18	0.13	0.30	2.41	5.57	2.63	6.08
12:19	0.16	0.37	2.41	5.57	2.63	6.07
12:20	0.16	0.37	2.41	5.57	2.63	6.08
12:21	0.14	0.32		5.57	2.63	6.08
12:22	0.14	0.33	2.41	5.57	2.63	6.07
12:23	0.18	0.43	2.41	5.57	2.63	6.06
12:24	0.15	0.33	2.41	5.57	2.63	6.08
12:25	0.13	0.30	2.41	5.57	2.63	6.08
12:26	0.14	0.33	2.41	5.57	2.63	6.07
12:27	0.13	0.29	2.41	5.57	2.64	6.09
12:28	0.15	0.34	2.41	5.57	2.63	6.08
12:29	0.21	0.49	2.41	5.58	2.63	6.07
12:30	0.21	0.49	2.41	5.57	2.63	6.08
12:31	0.20	0.46	2.41	5.57	2.63	6.08
12:32	0.18	0.41	2.41	5.57	2.63	6.07
12:33	0.21	0.49	2.41	5.57	2.63	6.06
12:34	0.18	0.42	2.41	5.57	2.63	6.08

Table 2Constant Vaccuum Test - December 17, 2019

	EXV		PZ-1		PZ-2	
L	Depth	Depth	Depth	Depth	Depth	Depth
	submerged	submerged	submerged	submerged	submerged	submerged
Time	(psi)	(ft)	(psi)	(ft)	(psi)	(ft)
12:35	0.13	0.29	2.41	5.57	2.63	6.08
12:36	0.18	0.41	2.41	5.57	2.63	6.07
12:37	0.17	0.38	2.41	5.57	2.64	6.09
12:38	0.14	0.32	2.41	5.56	2.63	6.08
12:39	0.12	0.27	2.41	5.56	2.63	6.07
12:40	0.16	0.37	2.41	5.56	2.63	6.08
12:41	0.13	0.31	2.41	5.57	2.63	6.08
12:42	0.13	0.29	2.41	5.56	2.63	6.07
12:43	0.15	0.35	2.41	5.57	2.62	6.06
12:44	0.15	0.34	2.41	5.57	2.63	6.08
12:45	0.16	0.38	2.41	5.57	2.63	6.07
12:46	0.14	0.33	2.41	5.56	2.63	6.06
12:47	0.16	0.37	2.41	5.56	2.63	6.08
12:48	0.15	0.34	2.41	5.56	2.63	6.08
12:49	0.11	0.24	2.41	5.56	2.63	6.06
12:50	0.11	0.25	2.41	5.56	2.63	6.07
12:51	0.18	0.42	2.41	5.56	2.63	6.08
12:52	0.21	0.49	2.41	5.56	2.63	6.07
12:53	0.25	0.58	2.41	5.57	2.62	6.06
12:54	0.26	0.60	2.41	5.57	2.63	6.08
12:55	0.18	0.42	2.41	5.56	2.63	6.06
12:56	0.16	0.38	2.41	5.56	2.63	6.07
12:57	0.19	0.43	2.41	5.56	2.63	6.08
12:58	0.16	0.36	2.41	5.56	2.63	6.07
12:59	0.15	0.33	2.41	5.56	2.62	6.06
13:00	0.18	0.41	2.41	5.56	2.63	6.08
13:01	0.20	0.46		5.56		6.07
13:02	0.17	0.38	2.41	5.57	2.63	6.06
13:03	0.15	0.35	2.41	5.56	2.63	6.08
13:04	0.22	0.50	2.41	5.56	2.63	6.07
13:05	0.19	0.45	2.41	5.56	2.62	6.06
13:06	0.19	0.44	2.41	5.56	2.63	6.07
13:07	0.23	0.54	2.41	5.57	2.63	6.07
13:08	0.24	0.55	2.41	5.56	2.62	6.06
13:09	0.26	0.59	2.41	5.56	2.63	6.07
13:10	0.21	0.49	2.41	5.56	2.63	6.07
13:11	0.24	0.55	2.41	5.57	2.63	6.07
13:12	0.22	0.51	2.41	5.56	2.62	6.05
13:13	0.20	0.47	2.41	5.56	2.63	6.08
13:14	0.22	0.50	2.41	5.56	2.63	6.07

Table 2Constant Vaccuum Test - December 17, 2019

	EXV		PZ-1		PZ-2	
L	Depth	Depth	Depth	Depth	Depth	Depth
	submerged	submerged	submerged	submerged	submerged	submerged
Time	(psi)	(ft)	(psi)	(ft)	(psi)	(ft)
13:15	0.23	0.54	2.41	5.56	2.63	6.06
13:16	0.21	0.48	2.41	5.56	2.63	6.07
13:17	0.19	0.44	2.41	5.56	2.63	6.08
13:18	0.25	0.57	2.41	5.56	2.63	6.06
13:19	0.23	0.54	2.41	5.56	2.62	6.05
13:20	0.23	0.52	2.41	5.56	2.63	6.08
13:21	0.23	0.53	2.41	5.56	2.63	6.07
13:22	0.26	0.60	2.41	5.56	2.62	6.06
13:23	0.23	0.53	2.41	5.56	2.63	6.07
13:24	0.23	0.53	2.41	5.56	2.63	6.07
13:25	0.22	0.52	2.41	5.56	2.62	6.06
13:26	0.21	0.49	2.41	5.56	2.62	6.05
13:27	0.20	0.46	2.41	5.56	2.63	6.07
13:28	0.22	0.51	2.41	5.56	2.63	6.06
13:29	0.24	0.55	2.41	5.56	2.62	6.05
13:30	0.21	0.49	2.41	5.56	2.63	6.08
13:31	0.20	0.46	2.41	5.56	2.63	6.07
13:32	0.23	0.54	2.41	5.56	2.63	6.07
13:33	0.22	0.50	2.41	5.56	2.63	6.07
13:34	0.21	0.48	2.41	5.56	2.63	6.07
13:35	0.23	0.53	2.41	5.56	2.63	6.07
13:36	0.25	0.57	2.41	5.57	2.62	6.06
13:37	0.22	0.51	2.41	5.56	2.63	6.08
13:38	0.22	0.51	2.41	5.56	2.63	6.07
13:39	0.25	0.57	2.41	5.56	2.62	6.06
13:40	0.24	0.54	2.41	5.56	2.63	6.07
13:41	0.22	0.51	2.41	5.56		6.07
13:42	0.23	0.53	2.41	5.56	2.63	6.06
13:43	0.26	0.60	2.41	5.56	2.62	6.06
13:44	0.23	0.52	2.41	5.56	2.63	6.08
13:45	0.25	0.57	2.41	5.56	2.63	6.07
13:46	0.27	0.63	2.41	5.57	2.62	6.06
13:47	0.28	0.64	2.41	5.56	2.63	6.07
13:48	0.28	0.65	2.41	5.57	2.63	6.07
13:49	0.22	0.50	2.41	5.56	2.62	6.06
13:50	0.25	0.57	2.41	5.56	2.63	6.07
13:51	0.23	0.53	2.41	5.56	2.63	6.08
13:52	0.20	0.47	2.41	5.56	2.63	6.06
13:53	0.21	0.49	2.41	5.56	2.62	6.06
13:54	0.21	0.48	2.41	5.56	2.63	6.08

Table 2Constant Vaccuum Test - December 17, 2019

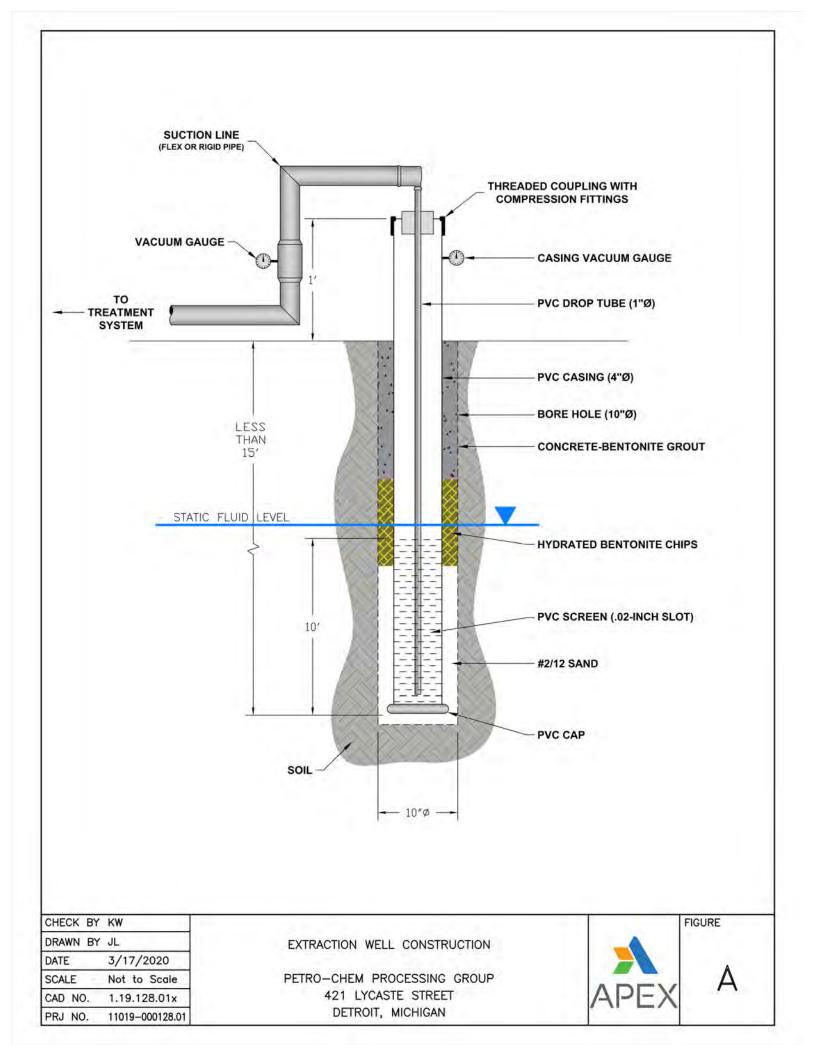
	EXV		um Test - Deco PZ	-		PZ-2	
	Depth	Depth	Depth	Depth	Depth	Depth	
	submerged	submerged	submerged	submerged	submerged	submerged	
Time	(psi)	(ft)	(psi)	(ft)	(psi)	(ft)	
13:55	0.19	0.43	2.41	5.56	2.63	6.07	
13:56	0.18	0.43	2.41	5.56	2.62	6.06	
13:57	0.24	0.55	2.41	5.56	2.63	6.06	
13:58	0.20	0.46	2.40	5.55	2.63	6.07	
13:59	0.19	0.44	2.40	5.55	2.62	6.05	
14:00	0.23	0.53	2.41	5.56	2.63	6.08	
14:01	0.22	0.51	2.41	5.56	2.63	6.06	
14:02	0.21	0.48	2.41	5.56	2.62	6.05	
14:03	0.26	0.60	2.41	5.56	2.63	6.08	
14:04	0.19	0.43	2.40	5.55	2.63	6.06	
14:05	0.18	0.41	2.40	5.55	2.62	6.06	
14:06	0.16	0.37	2.40	5.55	2.63	6.06	
14:07	0.20	0.47	2.40	5.55	2.63	6.07	
14:08	0.16	0.38	2.40	5.55	2.62	6.06	
14:09	0.15	0.34	2.40	5.55	2.62	6.05	
14:10	0.18	0.41	2.40	5.55	2.63	6.07	
14:11	0.16	0.37	2.40	5.55	2.63	6.06	
14:12	0.15	0.34	2.40	5.55	2.62	6.06	
14:13	0.16	0.37	2.40	5.55	2.63	6.06	
14:14	0.22	0.50	2.41	5.56	2.63	6.07	
14:15	0.17	0.39	2.40	5.54	2.62	6.06	
14:16	0.16	0.36	2.40	5.55	2.62	6.05	
14:17	0.18	0.41	2.40	5.55	2.63	6.07	
14:18	0.16	0.36	2.40	5.55	2.63	6.06	
14:19	0.14	0.33	2.40	5.54	2.62	6.05	
14:20	0.20	0.46	2.40	5.55	2.62	6.06	
14:21	0.23	0.54	2.40	5.55	2.63	6.07	
14:22	0.21	0.49	2.40	5.55	2.62	6.06	
14:23	0.22	0.50	2.40	5.55	2.63	6.06	
14:24	0.26	0.59	2.41	5.56	2.63	6.08	
14:25	0.24	0.55	2.40	5.55	2.62	6.06	

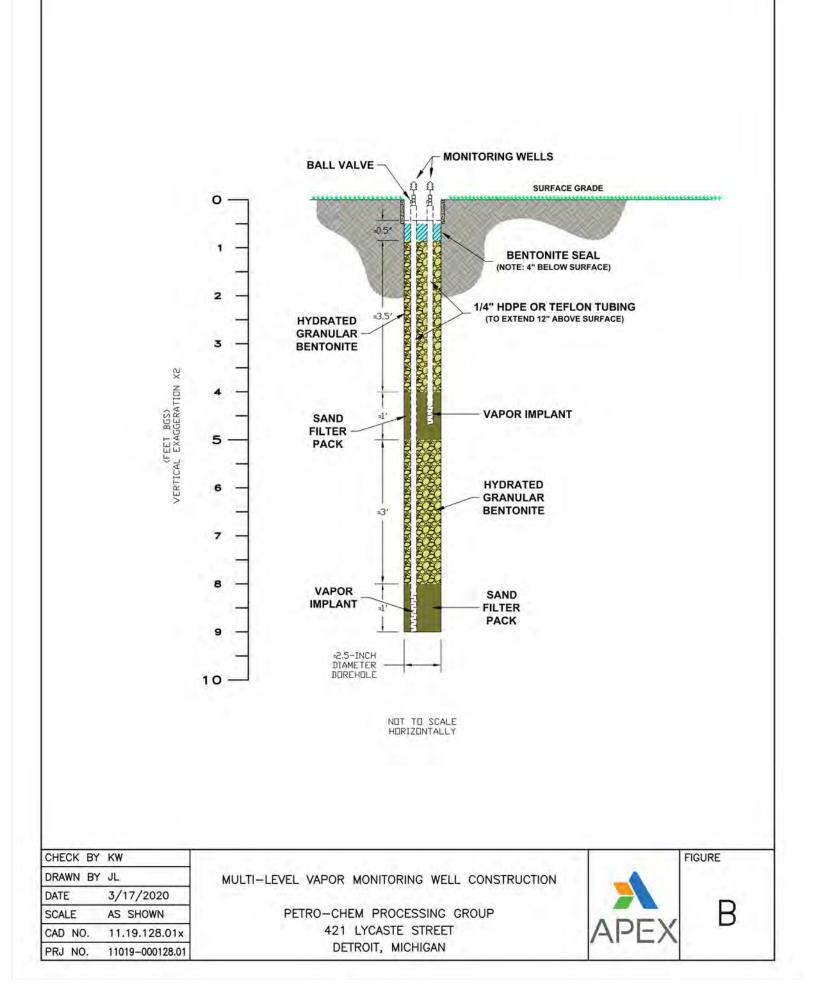
Table 2Constant Vaccuum Test - December 17, 2019

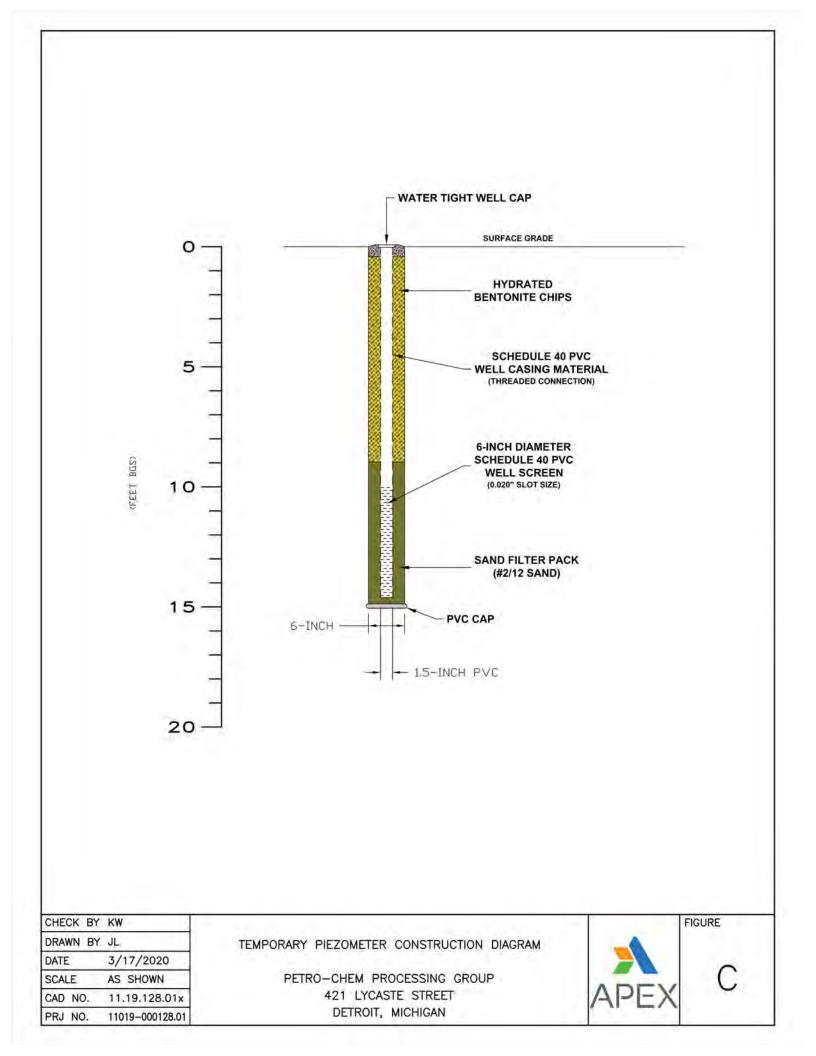


APPENDIX A

WELL CONSTRUCTION DETAILS









APPENDIX B

FIELD DATA SHEETS



DATE:	12-16-19	PILOT TEST - DAY 1
APEX PROJECT NO.	11019-000128	
PROJECT NAME	Stericycle – Petro-Cher	n
PROJECT LOCATION	Detroit, Michigan	

DESCRIPTION OF WORK COMPLETED
B:30 Am - 10:30 PM - SET OP PILOF TEST - STEP TEST
TAKE INITIAL READINGS _ & LINE VALUUM & PANW-1 - VALUUM-SHALLOW/D
* TRUCK VACUM * VMW-2 - VACUM - SITMUS/D
* CASING VACUUM PZ-1 + PZ-2 TRANSDULER
· EXW-1 - TRANSDUCER - MW-11- DRAWBOLDAR
* PIDREADING * PLOW RATE
10:30 START STEP TEST
1) 10:30 - 12:30 - 700 RPm (- Measurements collected every 15 min for 1" Hour 2) 1:00 - 3:00 - 1:000 RPm (- and wery how theroughan
3) 3.00 - 5:00 - 1.300 RPM -
2:30 COLLECTED WINTER STMILLE FROM DANK FOR DISPOSAL ADJROVAL
4100 CONFREEDUCE GALL WITH GUSTAND - APPEN to DISCUSS PRICLIMMAN RESULTS AND SELECT
FLOW RATE FOR TOMORROW'S CONSTANT RATE TEST
500-530 DIGHARSE WATTE GROUNDWATE - COLLEGAD GW SMARLE "EXTRACTED GW"
FROM TRUCK AS IT DUCKARA

Apex - Parte		
Apex - STEVE	KULPANOWSKY B: 15 - 5:30 F	0µv
Contractors - CHUCK	8:15-4:00 506 SITE SERVICES	PAUL MEYER - ECT -
TRUCK - JEFF!		8:15-5:00 pm

N	NO SOIL REMOVAL	GROUNDWATER E	XTRACTED - 260	galance (10.5	TRUCK )
PROBLEMS ENCOU	INTERED / ISSUES NOT	ED AND REPORTI	D TO STERICYCLE		
No issues re	EPOATED TO STERIC	YELE			

3

ECT M	IPE FIELD D	ATA SH	IEET		Job Nur	nber: 16	-0737			Facility	Name: P	etro-Che	m					Date of	Event: 12	2/16/201	9
	ld Personnel: F						421 Lyc	aste Stre	eet, Detro							age 1 of 2					
Vac Tru	ck Operator (C	ompany):	Jeff Black	k (JSS)					·		verage C	Off gas Va	apor Tem	perature	67	°F					2
		S	UMMAR	Y OF EX	TRACTIO	ON WEL	LS							S	SUMMAR	Y OF E	MISSION	IS			
				Ext	raction V	Vell Vac	uum (in.	Hg)				-			Eff	luent St	ack				
		EXW-1	EXW-1							Truck	Off gas						Flow				
	Inlet Vacuum	Line	Casing							RPM	Temp	Co	oncentrat	ion	-	Velocity	Rate	Remov	/al Rate		erval
Time	(in. Hg)	_	(in. H <sub>2</sub> O)								(°F)		(ppm)		(ft./r		(cfm)		./hr )		val (lbs.)
10:30	8	8	-		-				-	700	50		7			00	70		00		.00
10:45 11:00	12 13	9 10	-							700 700	48 48		255 406			00 00	70 44		. <u>16</u> .16		.04 .04
11:15	13	4	-							700	50		1,330			00	70		84		.04
11:30	7	4	15							700	60		1,925			00	70		20		.30
12:00	7	4	15							700	64		3,091			00	61		.67		.84
12:30	7	4	15							700	65		2,965		70	00	61	1.	.60	0.	.80
13:00	9	5	21							1,000	68		3,013			00	79		08		.04
13:15	9	5	21							1,000	68		2,944			50	74		92		.48
13:30 13:45	9 9	5 5	21 21							1,000	68 70		2,780 2,828			00 00	70 70		.70 .73		.43 .43
13:45	9	5	21	-			-			1,000	70		2,828			00	70		.60		.43 .90
14:30	9	5	21	1	1					1,000	68		3,890			50	83		83		.42
15:00	9	5	21	1			1			1,000	64		3,038			50	83		23		.11
15:15	13	8	26							1,300	74		2,995		1,0		87		27		.57
15:30	13	8	26							1,300	80		2,800			000	87		.10		.52
15:45	13	8	26							1,300	80		2,560		,	000	87		92	-	.48
16:00 16:30	13 13	8	26 26							1,300	80 85		2,600		10	000	87 87		95 39		.49
17:00	13	8	26							1,300	85		3,215 2,590		,	000	87		<u>92</u>		.19 .96
17.00	15	0	20							1,300	00		2,550		1,0	000	07	· ·	JZ	0.	.30
Total D	Duration: 7.5 hrs.																	TO	TAL	12	2.24
					SUMMA	ry of N	APL AND	D EXTR/	ACTION	WELL(S	) GAUGI	NG DAT	A								
Well N	lumber	Prior to MPE	(ft.)	Final	or After MF					lumber	Pri	ior to MPE	(ft.)	Final	or After MF	PE (ft.)					
(Screener			NAPL-T	D-NAPL	DTW		Change in		(Screene	d Interval)	D-NAPL	DTW	NAPL-T	D-NAPL	DTW	NAPL-T	Change	e in DTW			
EXW-1 (	,	9.63	0.00	-	-	-		-											-		
MW-11 ( PZ-1 (9	9.1-14.1) -	12.32 8.09	0.00	-	12.63	0.00		.31 -											-		
PZ-1 (9 PZ-2 (9		8.03	0.00	-	-	-		-						-					-		
					SUMI	MARY O	F OBSE	RVATIO	n point	(S) VAC	UUM RE	ADINGS	AND G	AUGING	DATA						
				и		n		1					al [ft. bgl])	1		1		n		1	
			(9.1-14.1)		1S (4.5)		1D (8.5)		2S (4.5)		2D (8.5)		9.8-14.8)		9.3-14.3)		-		1		
	Time	Vac. (in. H <sub>2</sub> O)	DTW (ft.)	Vac. (in. H <sub>2</sub> O)	DTW (ft.)	Vac. (in. H <sub>2</sub> O)	DTW (ft.)	Vac. (in. H <sub>2</sub> O)	DTW (ft.)	Vac. (in. H <sub>2</sub> O)	DTW (ft.)	Vac. (in. H <sub>2</sub> O)	DTW (ft.)	Vac. (in. H <sub>2</sub> O)	DTW (ft.)	Vac. (in. H <sub>2</sub> O)	DTW (ft.)	Vac. (in. H <sub>2</sub> O)	DTW (ft.)	Vac. (in. H <sub>2</sub> O)	DTW (ft.)
	Prior	-	12.32	-	-	-	-	-	-	-	-	-	-	-	-	2-7		2.7		2-7	
	10:45	-	-	0.00	-	0.50	-	0.01	-	0.00	-	-	-	-	-						
	11:00	-	-	0.41	-	1.15	-	0.10	-	0.16	-	-	-	-	-						
L	11:15	-	-	0.37	-	0.95	-	0.07	-	0.12	-	-	-	-	-		ļ	∦	ļ		↓
	11:30	-	-	0.43	-	1.51	-	0.14	-	0.18	-	-	-	-	-		<u> </u>				<b>↓</b> ]
	12:00 12:30	-	12.50 12.49	0.43	-	2.08	-	0.10	-	0.10	-	-	-	-	-		<u> </u>	╂────			┼──┨
<b> </b>	13:00		12.49	0.43	-	2.11	-	0.11	-	0.13	-	-	-		-		<u> </u>	┢───		<b> </b>	┼──┨
	13:15	-	-	0.57	-	2.21	-	0.16	-	0.18	-	-	-	-	-						
	13:30	-	-	0.57	-	2.14	-	0.15	-	0.11	-	-	-	-	-						
	13:45	-	-	0.58	-	2.28	-	0.15	-	0.23	-	-	-	-	-						
	14:00	-	-	0.58	-	1.81	-	0.17	-	0.15	-	-	-	-	-			<u> </u>			
	14:30	-	-	0.59	-	2.52	-	0.15	-	0.23	-	-	-	-	-			╢────			┼──┨
	15:00 15:15	-	12.57	0.57 0.73	-	1.99 1.95	-	0.16	-	0.25	-	-	-	-	-						┼──┨
	15:30	-	-	0.75	-	2.12	-	0.20	-	0.18	-	-	-		-		1	1	1		┼──┨
	15:45	-	-	0.72	-	2.24	-	0.20	-	0.29	-	-	-	-	-				1		
	16:00	-	-	0.78	-	2.20	-	0.22	-	0.27	-	-	-	-	-						
	16:30	-	-	0.78	-	2.32	-	0.22	-	0.32	-	-	-	-	-						
	17:00	-	12.63	0.79	-	1.88	-	0.22	-	0.15	-	-	-	-	-						—┨
<u> </u>	Post	_	21				1		1		1				1		1	╢────			<u> </u>
	Change in DTW est Extrac ion		0.31		1						r –		Γ		r		r –		Γ		┬──┨
	ell/Distance	EXW-1	~ 13 ft.	EXW-1	~ 14 ft.	EXW-1	~ 14 ft.	EXW-1	~ 36 ft.	EXW-1	~ 36 ft.	EXW-1	~ 8 ft.	EXW-1	~ 36 ft.						
	ta loggors inst					88		u	1	8				U		ų				u	المحصل

Note: Data loggers installed in wells EXW-1, PZ-1 and PZ-2.

ECT MPE FIELD DATA S	SHEET	ECT Field Personnel: P	aul Meyer	Date of Event: 12/16/2019		
		Facility Name: Petro-Ch	iem		Page 2 of 2	
Truck Inf	ormation	Operation Sche	dule	Recovery and Disposal Information		
Truck Operator	Jeff Black (JSS)	Start Time	10:30	NAPL Removed	0 gal	
Truck Number	VP-34	Number of Pumps	1	Disposal Facility	Stericycle Env. Solutions, Detroit, Michig	
Vacuum Pump		Average RPM	1000	Manifest Number	Not Applicab	
		End Time	17:00	Total Liquids Removed		260 gallons
Tank Capacity	2,500 gallons	Total Duration (h:m)	6:30			
Stack Inside Diameter	4 inches			Calculated Hydrocarbon Vap	ulated Hydrocarbon Vapor Removed 12.24 pou	
				Calculated Hydrocarbon Vapor Removed		2.0 gallons

Notes:

1) For the conversion calculation for hydrocarbon vapor to equivalent pounds removed a molecular weight of 56.106 grams/mole was utilized.

2) For the conversion calculation for hydrocarbon vapor to equivalent gallons removed an average density of 6.25 pounds/gallon for gasoline was utilized.

3) Off gas temperatures of 70°F used for off gas hydrocarbon emission calculation unless otherwise noted.

4) D-NAPL = Depth To Non-Aqueous Phase Liquid

5) DTW = Depth To Water

6) NAPL-T = Non-Aqueous Phase Liquid Thickness

7) Vac. = Vacuum in inches of water or Hg

8) MPE = Multi Phase Extraction

9) At EXW-1, a one-inch diameter drop pipe was installed within the well (final depth below the top-of-casing ~ 14').

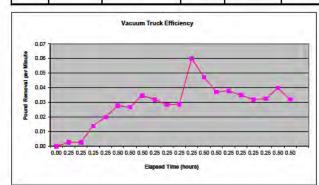
10) bgl = below grade level

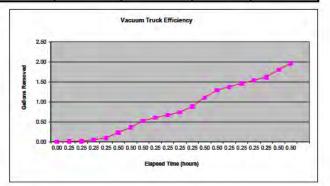
### ECT - Vacuum Truck Extraction Work Sheet Extraction Well #(s): EXW-1

Facility Name: Petro-Che			
Facility Address: 421 Lyc			
EGLE Facility ID Number	6		
Job Number: 16-0737			
Date of Event: 12/16/201	9	and the second se	
Total Liquids Removed:	260	gallons	
Total HoursVac Event:			

Equa Ion Used By MDEQ to C	Calculate Emission Rates in Pounds per Hour
R = Emission Rate in Ro. ftr.	ppmV = estimat ges concentration (ppm by volume)
VW = Molecular Weight of calibration gas ( sobutylens = 55.106)	ACFM = actual cubic set per minute
SCMM - standard cubic meters per minute - SCFM x 0.0283	2 .02 = deal Gas Constant
Constant = 1.323 E - ((60 min/hr.) (2.205 Km./kg) (kg 1000 g) g/1000 mgi]	80 - conversion to absolute temperature
ER = ppm, s t	MW/2 02 x SCMM x Compare
SCFM - standard cubic feet/min - ACFM x ( 60 70 %) / ( 60 7	(*F) crimula used hare assumes vapors adtracted are 70 *F unless otherwise noted

Time Start	Time Stop	Interval (Min)	Total Hours	Conc. (ppm)	CFM EXHAUST	EMISSION Ibs/min	Ibs. Removed	Gallons Removed *	Ibs. Cumulative	Gallons Cumulative
10:30	10:30	0	0.00	7	69.8	0.00	0.00	0.00	0.00	0.00
10:30	10:45	15	0.25	255	69.8	0.00	0.04	0.01	0.04	0.01
10:45	11:00	15	0.25	406	43.6	0.00	0.04	0.01	0.08	0.01
11:00	11:15	15	0.25	1,330	69.8	0.01	0.21	0.03	0.29	0.05
11:15	11:30	15	0.25	1,925	69.8	0.02	0.30	0.05	0.59	0.09
11:30	12:00	30	0.50	3,091	61.1	0.03	0.84	0.13	1.43	0.23
12:00	12:30	30	0.50	2,965	61.1	0.03	0.80	0.13	2.23	0.36
12:30	13:00	30	0.50	3,013	78.5	0.03	1.04	0.17	3.26	0.52
13:00	13:15	15	0.25	2,944	74.2	0.03	0.48	0.08	3.74	0.60
13:15	13:30	15	0.25	2,780	69.8	0.03	0.43	0.07	4.17	0.67
13:30	13:45	15	0.25	2,828	69.8	0.03	0.43	0.07	4.60	0.74
13:45	14:00	15	0.25	5,245	78.5	0.06	0.90	0.14	5.50	0.88
14:00	14:30	30	0.50	3,890	82,9	0.05	1.42	0.23	6.92	1.41
14:30	15:00	30	0.50	3,038	82.9	0.04	1.11	0.18	8.03	1.29
15:00	15:15	15	0.25	2,995	87.3	0.04	0.57	0.09	8.60	1.38
15:15	15:30	15	0.25	2,800	87.3	0.03	0.52	0.08	9.12	1.46
15:30	15:45	15	0.25	2,560	87.3	0.03	0.48	0.08	9.60	1.54
15:45	16:00	15	0.25	2,600	87.3	0.03	0.49	0.08	10.09	1.61
16:00	16:30	30	0.50	3,215	87.3	0.04	1.19	0.19	11.28	1.81
16:30	17:00	30	0.50	2,590	87.3	0.03	0.96	0.15	12.24	1.96





			Summary o	of MPE Events		
Event Date (Event #)	Total Pounds Removed (Hydrocarbon Vapor)	Total Gallons Removed (Hydrocarbon Vapor)	LNAPL Removed (gals.)	Calculated Transmissivity (ft <sup>2</sup> /day)	Total Liquids Removed/Duration	Extraction Well(s)
12/16/2019 (#1)	12.2	2.0	0	0.04	260 gals/6.5 hrs.	EXW-1
Totals	0.0	2.0	0		260	

Conversion weight used for gasoline is 6.25 lbs./gal.

#### Facility Name: Petro-Chem Job Number: 16-0737 Extraction Well #(s): EXW-1 Date of Event: 12/16/2019

			on LNAPL Trans		•		
	Inputs			Ca	lculation		
Symbol	Units	Value					Units
π		3.14	T <sub>n</sub> =		0.04		ft²/day
t	day	0.27					-
Qn	gal/day	7.23					
ρ <sub>r</sub>		0.78					
s <sub>n</sub>	ft.	0.00	T <sub>n</sub> equation =		$Q_n \star \rho$		ft²/day
Q <sub>w</sub>	gal/day	960		(2π*S <sub>n</sub> ) /			_
Tw	ft²/day	6.97		$(\ln(R_o/r_w))$	+	Qw/Tw	
R <sub>oi</sub>	ft.	40.00					
r <sub>w</sub>	ft.	0.17					
к	ft./day	1.12					
Well <sub>sat</sub>	ft.	6.22					

### Data Input Values

t	=	6.50	Duration of MPE (hours)
Q <sub>n</sub>	=	1.96	Calculated volume of LNAPL removed (gallons)
ρ <sub>r</sub>	=	0.78	Water density ratio, assume 0.78
s <sub>n</sub>	=	0.00	Final LNAPL drawdown (use largest initial product thickness in pumping wells, in feet)
Q <sub>w</sub>	=	260	Total volume of liquids removed (gallons)
т <sub>w</sub>	=	6.97	Groundwater Transmissivity (feet/day)
R <sub>oi</sub>	=	40	Estimate radius of influence based off measurements (feet)
r <sub>w</sub>	=	0.17	Well radius (PVC casing radius, in feet)
к	=	1.12	Hydraulic conductivity of site (feet/day)
Well <sub>sat</sub>	=	6.22	Saturated thickness in well screen in pumping wells average if multiple wells are used (feet)

\*ASTM Standards, E2856-11, equation 24 Calculated/Given User Input in-field Extracted from previous worksheets

#### Definitions

- t = Multi-Phase Extraction duration (days)
- Q<sub>n</sub> = LNAPL only discharge, stabilized LNAPL recovery rate (Length<sup>3</sup>/t)
- $\rho_r$  = LNAPL Water density ratio ( $\rho_{oi}/\rho_{water}$ ) (assume 0.78, unless specific ratio is known)
- s<sub>n</sub> = LNAPL drawdown at time t (Length)
- $Q_w$  = Groundwater discharge, groundwater system recovery rate (Length<sup>3</sup>/t)
- Tw = Groundwater Transmissivity (Length<sup>2</sup>/t), = formation hydraulic conductivity \* saturated thickness in well screen (ASTM D4043)
- R<sub>oi</sub> = radius of influence (Length)
- r<sub>w</sub> = well radius (Length)
- K = formation hydraulic conductivity (Length/time)
- Well<sub>sat</sub> = saturated thickness in well screen (Length)

Well # (Screened Int.)	Wellsat	DTW	Bottom of screen	Screen length
EXW-1 (4.8-14.8)	6.22	9 63	15.85	10
MW-11 (9.1-14.1)	-12.32	12.32		
PZ-1 (9.8-14.8)	-8.09	8 09		
PZ-2 (9.3-14.3)	-8.03	8 03		
0.00	0.00	0 00		
0.00	0.00	0 00		

Bottom of screen below toc

DTW adjusted due to presence of LNAPL



DATE:	12-17-19 PILOT TEST - DAY 2
APEX PROJECT NO.	11019-000128
PROJECT NAME	Stericycle – Petro-Chem
PROJECT LOCATION	Detroit, Michigan

DESCRIPTION OF WORK	COMPLETED
7:45-7:55 - SET-UP AND TAKE INITAL READINES	CONSTANT RATE TEST - 8 HRS
BISS START TELT	@ 1000 RPM VAC TRUCK = 600-900
Quarter how measurements first have	
Houry measurement thereffter	
SAME READING AS YESTERDAY	
8:10	
6:25 (Result) - VALUUM EVIDENT AT BOTH	VMW-1 + VMW-2 (Shallow + deep) PRIVEDUSLY TO CAPANGES IN TRUCK VACUUM)
840 VACUUMUCACTS ALMOST INSTAN,	PAWEDUJLY TO CAPANGES IN TRUCK VACUUM)
SSA - " EFFLUENT SAMPLE I COLLECTED. AT E	NOTAUST PIPE OF VAC TRUCK
:57	,
155 MW-11 PRAWDOWN & 0.25 ft	- 12:33 7 12.58 BTCC
2:55	
55	
S. STA- STOP TEST / "EFFLUENT SAMPLE 2" COLLECTED P	RIORTO SHUT POUN
FINDL MEASUREMENT COLLECTED	4:15-4165 DISCHARGE + CLEANDUT

PERSONNEI	L ON SITE (TIMES)			
Apex - STE	VE KULPANOWSKI	- 7:45-4:47 PM		
Contractors -	PAUL MEUCR	- 27:40 - 4.15	ECT	
	JEFF BLACK	27:40 - 4:47 PM	NT	

Number of Loads - No Jon	REMOVAL - GROU	INDWATER EXTRACT	ED & DISCHARGED = 260 gdl
			SAME AS YESTERDAY!
PROBLEMS ENCOUNTEREI	O / ISSUES NOTED AND	REPORTED TO STERIO	CYCLE
VALIANCE IN RPM	'S OF VAC TRUCK	- DECASIONALLY	INCLEASE OU DECREASE

3

ECT MF	PE FIE	ELD DA	ATA SH	IEET		Job Nur	nber: 19	-0827			Facility	cility Name: Petro-Chem						Date of	Event: 1	2/17/201	9	
ECT Field	Perso	nnel: Pa	ul Meyer			Facility	Address	: 421 Lvo	caste Str	eet, Detr	oit, MI	Even					Event #	2	Pa	ge 1 of 2		
	/ac Truck Operator (Company): Jeff Black (JSS) Av							Average Off gas Vapor Temperature 60 ° F						<u> </u>								
	SUMMARY OF EXTRACTION WELLS												Y OF EN	MISSION	IS		•					
Extraction Well Vacuum (in. Hg)							<u> </u>				Eff	luent Sta	ack									
			EXW-1	EXW-1							Truck	Off gas						Flow				
	Inlet Va	acuum	Line	Casing							RPM	Temp	Co	oncentrat	ion	Off gas	Velocity	Rate	Remov	/al Rate	Inte	erval
Time	(in. l	Hg)		(in. H <sub>2</sub> O)								(°F)		(ppm)		(ft./	min)	(cfm)		./hr.)	Remov	al (bs.)
7:55	1	1	8	23							1,000	45		712			00	52	0.	.34	0.	.00
8:10	1		7	24							1,000	58		1,114			00	79		.78		20
8:25	1		6	23							1,000	60		1,512			50	74		.00		25
8:40	10		6	22							1,000	60		1,009			00	70		.63		16
8:55	10		6	22							1,000	62		1,160			00	61		.63		.16
9:55	1		7	26							1,000	70		1,994			000	87		.52		52
10:55	10		6	24							1,000	70		1,704			000	87		.30		.30
11:55	1		6	26							1,000	65		1,755			000	87		.35		.35
12:55	10	-	6	24							1,000	70		1,766			000	87		.35		35
13:55	1(		6	24							1,000	74		1,828		,	000	87		.38		.38
14:55	1(		6	23	-						1,000	75		1,747			50	83		25		25
15:55	1(	0	6	23							1,000	72		1,783		9	50	83	1.	.29	1.	29
Total D	uration: 8	9 bro																	то	TAL	10	.21
Total Di		0 1115.			e									ТЛ								
	<u>ار</u>	Dric	or to MPE	(# )*		or After MF		ur		1			or to MPE		Einal	or After Mi	DE (# )	ır				
Well Nun (Screened Ir		D-NAPL	DTW	NAPL-T	D-NAPL	DTW	NAPL-T	Change (f	in DTW		lumber d Interval)	D-NAPL	DTW	NAPL-T	D-NAPL	DTW	NAPL-T	Change				
EXW-1 (4.8		D-INAPL	9.63	0.00	D-NAPL	12.21	0.00		.58	(Ocreene	a intervar)	D-INAPL	DIV	INAPL-I	D-NAPL	DIW	INAPL-I	Onlange				
MW-11 (9.1	,	-	12.33	0.00		12.66	0.00		.33													
PZ-1 (9.8-		-	8.09	0.00	-	8.58	0.00		.49													
PZ-2 (9.3-	,	-	8.03	0.00	-	8.15	0.00		.12									-				
1 2-2 (0.0-	14.3)		0.00	0.00		0.10	0.00		. 1 2									-				
	<u> </u>					SUMM	ARY OF	OBSER	VATION		(S) VAC	UUM RE	ADINGS	S AND G	AUGINO	DATA	<u> </u>					
											Well Nun	nber (Scre	en Interv	al [ft. bgl])								
			MW-11 (	9.1-14.1)	VMW-	1S (4.5)	VMW-	1D (8 5)	VMW-	2S (4.5)	VMW-	2D (8 5)	PZ-1 (9	9 8-14 8)	PZ-2 (	9.3-14.3)				-		
	<b>-</b> .		Vac. (in.	DTW (ft.)	Vac. (in.	DTW (ft)	Vac. (in.	DTW (ft.)	Vac. (in.	DTW (ft.)	Vac. (in.	DTW (ft.)	Vac. (in.	DTW (ft.)	Vac. (in.	DTW (ft.)	Vac. (in.	DTW (ft.)	Vac. (in.	DTW (ft.)	Vac. (in.	DTW (ft.
	Time		H <sub>2</sub> O)	. ,	H <sub>2</sub> O)	. ,	H <sub>2</sub> O)		H <sub>2</sub> O)	. ,	H <sub>2</sub> O)	. ,	H <sub>2</sub> O)		$\Pi_2 O$	. ,	H <sub>2</sub> O)	( )	H <sub>2</sub> O)	( ' '	H <sub>2</sub> O)	
	Prior		-	12.33	-	-	-	-	-	-	-	-	-	-	-	-						
	8:10		-	-	0.54	-	1.88	-	0.17	-	0.15	-	-	-	-	-						
	8:25		-	-	0.65	-	2.51	-	0.18	-	0.24	-	-	-	-	-						
	8:40 8:55		-	-	0.65	-	1.96 3.10	-	0.17	-	0.26	-	-	-	-	-						
	8:55 9:55		-	12.50 12.58	0.68 0.70	-	1.48	-	0.20	-	0.29			-	-	-				ł		
	9.55		-	- 12.30	0.70	-	1.40	-	0.20	-	0.30		-	-	-	-				ł		1
	11:55		-	-	0.70	-	1.64	-	0.20	-	0.30	-	-	-	-	-						
	12:55		-	-	0.73	-	1.04	-	0.20	-	0.30	-	-	-	-	-						1
	13:55		-	12.64	0.70	-	1.81	-	0.20	-	0.25	-	-	-	_	-	l			<u> </u>		
	14:55		-	12.59		_	2.06	-	0.20	-	0.23	-		-	_	-	l			<u> </u>		
	15:45		_	12.66	0.00	-	2.00	_	0.20	-	0.21	-	-	_	_	-	l			<u> </u>		1
	Post			12.00	0.12		2.00		0.10		0.10			8.58		8.15	l			<u> </u>		
	nange in	DTW	-0	.33		1	<b> </b>	1	<b> </b>	1		1		0.00		0.10	l	1		1		1
Neares	<u> </u>																					
	/Distan		EXW-1	~ 13 ft.	EXW-1	~ 14 ft.	EXW-1	~ 14 ft.	EXW-1	~ 36 ft.	EXW-1	~ 36 ft.	EXW-1	~ 8 ft.	EXW-1	~ 36 ft.						
			l	I	п		I <u></u>		II	1	][ ]]]]]]]]]]]]]]]]]]]]]]]]]]]]]]]]]]]	1	п	1	п		п		N	I	II	

Note: Data loggers installed in wells EXW-1, PZ-1 and PZ-2. \* With execption of MW-11 DTW measurement from 12/16/19

ECT MPE FIELD DATA S	SHEET	ECT Field Personnel: Pa	aul Meyer	Date of Event: 12/17/2019				
		Facility Name: Petro-Ch	em			Page 2 of 2		
Truck Inf	ormation	Operation Sche	dule	Recovery and Disposal Information				
Truck Operator	Jeff Black (JSS)	Start Time 7:55		NAPL Removed	0 gallon			
Truck Number	VP-34	Number of Pumps	1	Disposal Facility	Stericycle Env. Solutions, Detroit, Michigan			
Vacuum Pump		Average RPM	1000	Manifest Number		Not Applicable		
		End Time	15:55	Total Liquids Removed		260 gallons		
Tank Capacity	2,500 gallons	Total Duration (h:m)	8:00					
Stack Inside Diameter	4 inches			Calculated Hydrocarbon Vapo	or Removed	10.21 pounds		
				Calculated Hydrocarbon Vapo	or Removed	1.6 gallons		

Notes:

1) For the conversion calculation for hydrocarbon vapor to equivalent pounds removed a molecular weight of 56.106 grams/mole was utilized.

2) For the conversion calculation for hydrocarbon vapor to equivalent gallons removed an average density of 6.25 pounds/gallon for gasoline was utilized.

3) Off gas temperatures of 70°F used for off gas hydrocarbon emission calculation unless otherwise noted.

4) D-NAPL = Depth To Non-Aqueous Phase Liquid

5) DTW = Depth To Water

6) NAPL-T = Non-Aqueous Phase Liquid Thickness

7) Vac. = Vacuum in inches of water or Hg

8) MPE = Multi Phase Extraction

9) At EXW-1, a one-inch diameter drop pipe was installed within the well (final depth below the top-of-casing ~ 14').

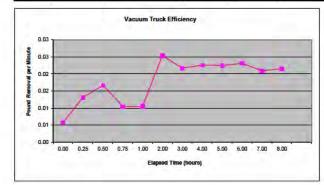
10) bgl = below grade level

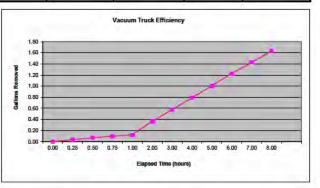
### ECT - Vacuum Truck Extraction Work Sheet Extraction Well #(s): EXW-1

Facility Name: Petro-Chem							
Facility Address: 421 Lycaste Street, Detroit, MI							
EGLE Facility ID Number:							
Job Number: 19-0827							
Date of Event: 12/17/201	9						
Total Liquids Removed:	260	gallons					
Total HoursVac Event:	8:00	hr:min					

Equa Ion Used By MDEQ to C	alculate Emission Rates in Pounds per Hour
R = Emission Rate in Balfur.	ppmV = exhaust gas concentration (ppm try volume)
VW - Molecular Weight of calibration gas (acoutylana - 56.108)	ACFM = actual cubic set per minute
SCMM - standard cubic meters per minute - SCFM x 0.0283	2 .02 - deal Gas Constant
Constant = 1 323 E - ((60 min/kr.) (2 205 lbs./kg) (kg 1000 g) g/1000 mgil	60 - conversion to absolute temperature
ER = ppm, x M	NW/2 .02 x SCMM x Combant
SCFM - standard cubic feetimin - ACFM x ( 60 70 °F) / ( 60 7	*F) armula used here assumes vapors extracted are 70 *F unless otherwise noted

Time Start	Time Stop	Interval (Min)	Total Hours	Conc. (ppm)	CFM EXHAUST	EMISSION Ibs/min	Ibs. Removed	Gallons Removed *	Ibs. Cumulative	<b>Gallons</b> Cumulative
7:55	7:55	0	0.00	712	52.4	0.01	0.00	0.00	0.00	0.00
7:55	8:10	15	0.25	1,114	78.5	0.01	0.20	0.03	0.20	0.03
8:10	8:25	15	0.50	1,512	74.2	0.02	0.25	0.04	0.45	0.07
8:25	8:40	15	0.75	1,009	69.8	0.01	0.16	0.03	0.60	0.10
8:40	8:55	15	1.00	1,160	61.1	0.01	0.16	0.03	0.76	0.12
8:55	9:55	60	2.00	1,994	87.3	0.03	1.52	0.24	2.28	0.37
9:55	10:55	60	3.00	1,704	87.3	0.02	1.30	0.21	3.58	0.57
10:55	11:55	60	4.00	1,755	87.3	0.02	1.35	0.22	4.93	0.79
11:55	12:55	60	5.00	1,766	87.3	0.02	1.35	0.22	6.28	1.01
12:55	13:55	60	6.00	1,828	87.3	0.02	1.38	0.22	7.67	1.23
13:55	14:55	60	7.00	1,747	82.9	0.02	1.25	0.20	8.92	1.43
14:55	15:55	60	8.00	1,783	82.9	0.02	1.29	0.21	10.21	1.63
1.00			- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1		1.000	1	and the second se		the second second	





Summary of MPE Events						
Event Date (Event #)	Total Pounds Removed (Hydrocarbon Vapor)	Total Gallons Removed (Hydrocarbon Vapor)	LNAPL Removed (gals.)	Calculated Transmissivity (ft <sup>2</sup> /day)	Total Liquids Removed/Duration	Extraction Well(s)
12/16/2019 (#1) 12/17/2019 (#2)	12.2 10.2	2.0 1.6	0	0.04	260 gals/6.5 hrs. 260 gals/8 hrs.	EXW-1 EXW-1
Totals	10.2	3.6	0		520	2

Conversion weight used for gasoline is 6.25 lbs./gal.

#### Facility Name: Petro-Chem Job Number: 19-0827 Extraction Well #(s): EXW-1 Date of Event: 12/17/2019

	Multi-Phase Extraction LNAPL Transmissivity Calculation* Equation to estimate $T_n$ using an applied vacuum to formation and LNAPL and water production rates.						
	Inputs			Ca	lculation		
Symbol	Units	Value					Units
π		3.14	T <sub>n</sub> =		0.03		ft²/day
t	day	0.33					-
Qn	gal/day	4.90					
ρ <sub>r</sub>		0.78					
s <sub>n</sub>	ft.	0.00	T <sub>n</sub> equation =		$Q_{n^{\ast}}\rho$		ft²/day
Q <sub>w</sub>	gal/day	780		(2π*S <sub>n</sub> ) /			_
Tw	ft²/day	6.97		$(\ln(R_o/r_w))$	+	Qw/Tw	
R <sub>oi</sub>	ft.	40.00					
r <sub>w</sub>	ft.	0.17					
к	ft./day	1.12					
Well <sub>sat</sub>	ft.	6.22					

### Data Input Values

t	=	8.00	Duration of MPE (hours)
Q <sub>n</sub>	=	1.63	Calculated volume of LNAPL removed (gallons)
ρ <sub>r</sub>	=	0.78	Water density ratio, assume 0.78
s <sub>n</sub>	=	0.00	Final LNAPL drawdown (use largest initial product thickness in pumping wells, in feet)
Q <sub>w</sub>	=	260	Total volume of liquids removed (gallons)
т <sub>w</sub>	=	6.97	Groundwater Transmissivity (feet/day)
R <sub>oi</sub>	=	40	Estimate radius of influence based off measurements (feet)
r <sub>w</sub>	=	0.17	Well radius (PVC casing radius, in feet)
к	=	1.12	Hydraulic conductivity of site (feet/day)
Well <sub>sat</sub>	=	6.22	Saturated thickness in well screen in pumping wells average if multiple wells are used (feet)

\*ASTM Standards, E2856-11, equation 24 Calculated/Given User Input in-field Extracted from previous worksheets

#### Definitions

- Multi-Phase Extraction duration (days) t =
- LNAPL only discharge, stabilized LNAPL recovery rate (Length<sup>3</sup>/t) Q<sub>n</sub> =
- LNAPL Water density ratio  $(\rho_{oil} \! / \! \rho_{water})$  (assume 0.78, unless specific ratio is known) ρr =
- s<sub>n</sub> = LNAPL drawdown at time t (Length)
- Groundwater discharge, groundwater system recovery rate (Length<sup>3</sup>/t) Qw =
- Groundwater Transmissivity (Length<sup>2</sup>/t), = formation hydraulic conductivity \* saturated thickness in well screen (ASTM D4043) Tw =
- R<sub>oi</sub> radius of influence (Length) =
- well radius (Length)  $\mathbf{r}_{\mathbf{w}}$ =
- к = formation hydraulic conductivity (Length/time)
- Well<sub>sat</sub> = saturated thickness in well screen (Length)

Well # (Screened Int.)	Wellsat	DTW	Bottom of screen	Screen length
EXW-1 (4.8-14.8)	6.22	9 63	15.85	10
MW-11 (9.1-14.1)	-12.33	12.33		
PZ-1 (9.8-14.8)	-8.09	8 09		
PZ-2 (9.3-14.3)	-8.03	8 03		
0.00	0.00	0 00		
0.00	0.00	0 00		

Bottom of screen below toc

DTW adjusted due to presence of LNAPL



APPENDIX C

ANALYTICAL LABORATORY REPORTS



Monday, December 30, 2019

Fibertec Project Number:94246Project Identification:Stericycle (11019-000128.02) /11019-000128.02Submittal Date:12/18/2019

Ms. Kellie Wing APEX 46555 Humboldt Dr. Ste. 103 Novi, MI 48377

Dear Ms. Wing,

Thank you for selecting Fibertec Environmental Services as your analytical laboratory. The samples you submitted have been analyzed in accordance with NELAC standards and the results compiled in the attached report. Any exceptions to NELAC compliance are noted in the report. These results apply only to those samples submitted. Please note TO-15 samples will be disposed of 7 calendar days after the reporting date. All other samples will be disposed of 30 days after the reporting date.

If you have any questions regarding these results or if we may be of further assistance to you, please contact me at (517) 699-0345.

Sincerely,

Stephan . Wallan

By Stephannie Wallace at 3:42 PM, Dec 30, 2019

For Daryl P. Strandbergh Laboratory Director

Enclosures

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Client Identification:	APEX	Sample Description:	Extracted Groundwater	Chain of Custody:	180664
Client Project Name:	Stericycle (11019-000128.02)	Sample No:		Collect Date:	12/16/19
Client Project No:	11019-000128.02	Sample Matrix:	Ground Water	Collect Time:	17:15
Sample Comments:					

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

Volatile Organic Compounds (VOCs) by GC Method: EPA 5030C/EPA 8260D	:/MS			quot ID: scription:	94246-001 Extracted Grour		x: Ground Water		
					Prepa	ration	Ar	nalysis	
Parameter(s)	Result	Q Units	Reporting Limit	Dilution	P. Date	P. Batch	A. Date	A. Batch	Init.
1. Acetone	13000	μg/L	500	100	12/23/19	VM19L23A	12/23/19	VM19L23A	ZJJ
2. Acrylonitrile	U	μg/L	5.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
3. Benzene	76	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
4. Bromobenzene	1.4	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
5. Bromochloromethane	U	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
6. Bromodichloromethane	U	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
7. Bromoform	U	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
8. Bromomethane	U	μg/L	5.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
9. t-Butanol	U	μg/L	500	100	12/23/19	VM19L23A	12/23/19	VM19L23A	ZJJ
10.2-Butanone	6100	μg/L	100	100	12/23/19	VM19L23A	12/23/19	VM19L23A	ZJJ
11. n-Butylbenzene	U	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
12. sec-Butylbenzene	1.8	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
13. tert-Butylbenzene	U	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
14. Carbon Disulfide	U	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
15. Carbon Tetrachloride	U	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
16. Chlorobenzene	U	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
17. Chloroethane	U	μg/L	5.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
18. Chloroform	U	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
19. Chloromethane	U	μg/L	5.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
20. Cyclohexane	U	μg/L	5.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
21.1,2-Dibromo-3-chloropropane (SIM)	U	μg/L	5.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJu
22. Dibromochloromethane	U	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
23. Dibromomethane	U	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
24. trans-1,4-Dichloro-2-butene (SIM)	U	μg/L	5.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
25.1,2-Dichlorobenzene	36	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
26.1,3-Dichlorobenzene	U	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
27.1,4-Dichlorobenzene	U	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
28. Dichlorodifluoromethane	U	μg/L	5.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
29.1,1-Dichloroethane	110	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
30.1,2-Dichloroethane	7.2	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
31.1,1-Dichloroethene	1.5	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
32. cis-1,2-Dichloroethene	1200	μg/L	50	100	12/23/19	VM19L23A	12/23/19	VM19L23A	ZJJ
33. trans-1,2-Dichloroethene	9.2	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
34.1,2-Dichloropropane	U	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJ
35. cis-1,3-Dichloropropene	U	μg/L	0.50	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
36. trans-1,3-Dichloropropene	U	μg/L	0.50	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
37. Diethyl Ether	18	μg/L	5.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ

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	Dale.

Client Identification:	APEX	Sample Description:	Extracted Groundwater	Chain of Custody:	180664
Client Project Name:	Stericycle (11019-000128.02)	Sample No:		Collect Date:	12/16/19
Client Project No:	11019-000128.02	Sample Matrix:	Ground Water	Collect Time:	17:15
Sample Comments:					

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

Volatile Organic Compounds (VOCs) by Method: EPA 5030C/EPA 8260D	GC/MS			uot ID: cription:	94246-001 Extracted Grour		Ground Water		
					Prepa	ration	Ar	nalysis	
Parameter(s)	Result	Q Units	Reporting Limit	Dilution	P. Date	P. Batch	A. Date	A. Batch	Init.
‡ 38. Diisopropyl Ether	21	μg/L	5.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
‡ 39.ETBE	U	μg/L	5.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
40. Ethylbenzene	3100	μg/L	50	100	12/23/19	VM19L23A	12/23/19	VM19L23A	ZJJ
41. Ethylene Dibromide	U	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
‡ 42. Hexachloroethane	U	μg/L	5.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
43.2-Hexanone	U	μg/L	5.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
44. Isopropylbenzene	26	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
45.4-Isopropyltoluene	1.2	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
46.4-Methyl-2-pentanone	38000	μg/L	200	200	12/23/19	VM19L23A	12/23/19	VM19L23A	ZJJ
47. Methylene Chloride	U	μg/L	5.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
‡ 48.2-Methylnaphthalene	15	μg/L	5.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
49. MTBE	3200	μg/L	50	100	12/23/19	VM19L23A	12/23/19	VM19L23A	ZJJ
50. Naphthalene	15	μg/L	5.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
51. n-Propylbenzene	42	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
52. Styrene	3.8	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
‡ 53. TAME	57	μg/L	5.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
54.1,1,1,2-Tetrachloroethane	U	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
55.1,1,2,2-Tetrachloroethane	U	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
56. Tetrachloroethene	15	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
‡ 57. Tetrahydrofuran	20000	μg/L	200	100	12/23/19	VM19L23A	12/23/19	VM19L23A	ZJJ
58. Toluene	14000	μg/L	50	100	12/23/19	VM19L23A	12/23/19	VM19L23A	ZJJ
59.1,2,3-Trichlorobenzene	U	μg/L	5.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
60.1,2,4-Trichlorobenzene	U	μg/L	5.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
61.1,1,1-Trichloroethane	8.6	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
62.1,1,2-Trichloroethane	U	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
63. Trichloroethene	10	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
64. Trichlorofluoromethane	U	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
65.1,2,3-Trichloropropane	U	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
\$ 66.1,2,3-Trimethylbenzene	41	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
67.1,2,4-Trimethylbenzene	190	μg/L	50	100	12/23/19	VM19L23A	12/23/19	VM19L23A	ZJJ
68.1,3,5-Trimethylbenzene	78	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
69. Vinyl Chloride	12	μg/L	1.0	1.0	12/20/19	VP19L20A	12/20/19	VP19L20A	ZJJ
70.m&p-Xylene	11000	μg/L	100	100	12/23/19	VM19L23A	12/23/19	VM19L23A	ZJJ
71.o-Xylene	3200	μg/L	50	100	12/23/19	VM19L23A	12/23/19	VM19L23A	ZJJ
‡ 72. Xylenes	14000	μg/L	150	100	12/23/19	VM19L23A	12/23/19	VM19L23A	ZJJ

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lab@fibertec us



Client Identification:	APEX	Sample Description:	Extracted Groundwater	Chain of Custody:	180664
Client Project Name:	Stericycle (11019-000128.02)	Sample No:		Collect Date:	12/16/19
Client Project No:	11019-000128.02	Sample Matrix:	Ground Water	Collect Time:	17:15
Sample Comments:					

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

Volatile Organic Compounds (VOCs)	by GC/MS			Aliq	uot ID:	94246-001	Matrix: G	round Water		
Method: EPA 5030C/EPA 8260D				Des	cription:	Extracted Groun	dwater			
						Prepa	ration	Analysis		
Parameter(s)	Result	Q	Units	Reporting Limit	Dilutior	P. Date	P. Batch	A. Date	A. Batch	Init.
Surrogate Summary				Control Limit	S	<u> </u>	Batch			
4-Bromofluorobenzene(S)	102		%	80-120						
4-Bromofluorobenzene(S)	102		%	80-120	80-120 VM19L23A					
4-Bromofluorobenzene(S)	89		%	80-120	80-120 VP19L20A					
Dibromofluoromethane(S)	99		%	80-120		VN	119L23A			
Dibromofluoromethane(S)	102		%	80-120		VN	119L23A			
Dibromofluoromethane(S)	91		%	80-120		VP	19L20A			
1,2-Dichloroethane-d4(S)	98		%	80-120		VN	119L23A			
1,2-Dichloroethane-d4(S)	99		%	80-120		VN	119L23A			
1,2-Dichloroethane-d4(S)	104		%	80-120		VP	19L20A			
Toluene-d8(S)	100		%	80-120		VN	119L23A			
Toluene-d8(S)	100		%	80-120		VN	119L23A			
Toluene-d8(S)	96		%	80-120		VP	19L20A			

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lab@fibertec us



Dale.

-					
Client Identification:	APEX	Sample Description:	Effluent Sample 1	Chain of Custody:	180664
Client Project Name:	Stericycle (11019-000128.02)	Sample No:		Collect Date:	12/17/19
Client Project No:	11019-000128.02	Sample Matrix:	Air	Collect Time:	09:11
Sample Comments:					

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

TO-15 (Tedlar Bag) Method: EPA TO-15				uot ID: cription:	94246-002 Effluent Sample 1	Matrix:	Air		
					Prepara	ation	An	alysis	
Parameter(s)	Result	Q Units	Reporting Limit	Dilution		P. Batch	A. Date	A. Batch	Init.
‡ 1. Acetone	U	µg/m3	28000	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
2. Benzene	8100	µg/m3	3500	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
3. Benzyl Chloride	U	µg/m3	1200	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
4. Bromodichloromethane	U	µg/m3	710	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
5. Bromoform	U	μg/m3	2500	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
6. Bromomethane	U	µg/m3	1600	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
7.1,3-Butadiene	U	μg/m3	590	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
8.2-Butanone	U	µg/m3	8600	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
9. Carbon Disulfide	U	μg/m3	9700	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
10. Carbon Tetrachloride	U	µg/m3	670	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
11. Chlorobenzene	U	μg/m3	1200	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
12. Chloroethane	U	µg/m3	1100	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
13. Chloroform	U	µg/m3	500	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
14. Chloromethane	U	µg/m3	4100	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
15. Cyclohexane	4700	µg/m3	940	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
16. Dibromochloromethane	U	µg/m3	870	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
17.1,2-Dichlorobenzene	U	µg/m3	31000	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
18.1,3-Dichlorobenzene	U	µg/m3	6200	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
19.1,4-Dichlorobenzene	U	µg/m3	6200	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
20. Dichlorodifluoromethane	U	µg/m3	2000	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
21.1,1-Dichloroethane	8900	μg/m3	1100	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
22.1,2-Dichloroethane	570	µg/m3	430	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
23.1,1-Dichloroethene	U	μg/m3	1100	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
24. cis-1,2-Dichloroethene	67000	µg/m3	1100	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
25. trans-1,2-Dichloroethene	U	µg/m3	1100	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
26.1,2-Dichloropropane	U	µg/m3	1200	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
27. cis-1,3-Dichloropropene	U	µg/m3	500	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
28. trans-1,3-Dichloropropene	U	µg/m3	1700	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
29.1,4-Dioxane	U	µg/m3	3600	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
‡ 30. Ethyl Acetate	U	µg/m3	3300	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
31. Ethylbenzene	500000	µg/m3	4700	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
32. Ethylene Dibromide	U	µg/m3	850	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
33. n-Heptane	130000	μg/m3	1800	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
34. Hexachlorobutadiene	U	µg/m3	2600	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
35. n-Hexane	400000	μg/m3	4000	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
‡ 36.2-Hexanone	U	μg/m3	10000	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
‡ 37. Isopropanol	U	μg/m3	7200	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP

1914 Holloway Drive 11766 E. Grand River 8660 S. Mackinaw Trail Holt, MI 48842 Brighton, MI 48116 Cadillac, MI 49601 T: (517) 699-0345 T: (810) 220-3300 T: (231) 775-8368



Dale.

Client Identification:	APEX	Sample Description:	Effluent Sample 1	Chain of Custody:	180664
Client Project Name:	Stericycle (11019-000128.02)	Sample No:		Collect Date:	12/17/19
Client Project No:	11019-000128.02	Sample Matrix:	Air	Collect Time:	09:11
Sample Comments:					

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

TO-15 (Tedlar Bag)			Aliqu	ot ID:	94246-002	Matrix:	Air		
Method: EPA TO-15			Desc	ription:	Effluent Sample 1				
					Prepara	ation	An	alysis	
Parameter(s)	Result	Q Units	Reporting Limit	Dilution	P. Date	P. Batch	A. Date	A. Batch	Init.
38.4-Methyl-2-pentanone	39000	µg/m3	3700	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
39. Methylene Chloride	U	µg/m3	7000	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
‡ 40.2-Methylnaphthalene	U	µg/m3	40000	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
41. MTBE	U	µg/m3	4000	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
‡ 42. Naphthalene	U	µg/m3	5300	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
43. Styrene	U	µg/m3	11000	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
44.1,1,2,2-Tetrachloroethane	930	µg/m3	760	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
45. Tetrachloroethene	8100	µg/m3	1800	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
‡ 46. Tetrahydrofuran	11000	µg/m3	1300	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
47. Toluene	2100000	µg/m3	25000	34000	12/27/19 10:32	VN19L27A	12/27/19 21:36	VN19L27A	KCM
48.1,2,4-Trichlorobenzene	U	µg/m3	71000	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
49.1,1,1-Trichloroethane	3000	µg/m3	580	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
50.1,1,2-Trichloroethane	U	µg/m3	1500	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
51. Trichloroethene	720	µg/m3	570	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
52. Trichlorofluoromethane	U	µg/m3	1500	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
53.1,1,2-Trichlorotrifluoroethane	U	µg/m3	3400	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
54.1,2,4-Trimethylbenzene	15000	µg/m3	5100	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
55.1,3,5-Trimethylbenzene	8300	μg/m3	5100	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
56. Vinyl Acetate	U	μg/m3	9200	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
57. Vinyl Chloride	8900	μg/m3	1100	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
58. m&p-Xylene	1500000	µg/m3	9200	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
59. o-Xylene	300000	µg/m3	47000	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
‡ 60. Xylenes	1800000	µg/m3	56000	3900	12/26/19 11:35	VN19L26A	12/27/19 06:14	VN19L26A	MJP
Surrogate Summary			Control Limits	<u>i</u>	B	atch			
4-Bromofluorobenzene(S)	110	%	80-120			9L26A			
4-Bromofluorobenzene(S)	99	%	80-120		VN1	9L27A			

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Dale.

Client Identification:	APEX	Sample Description:	Effluent Sample 2	Chain of Custody:	180664
Client Project Name:	Stericycle (11019-000128.02)	Sample No:		Collect Date:	12/17/19
Client Project No:	11019-000128.02	Sample Matrix:	Air	Collect Time:	15:55
Sample Comments:					

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

TO-15 (Tedlar Bag) Method: EPA TO-15				Aliquot ID: Description:		Matrix: Air			
			·		Preparation		Analysis		
Parameter(s)	Result	Q Units	Reporting Limit	Dilution		P. Batch	A. Date	A. Batch	Init.
‡ 1. Acetone	U	µg/m3	9900	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
2. Benzene	U	µg/m3	3700	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
3. Benzyl Chloride	U	μg/m3	510	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
4. Bromodichloromethane	U	µg/m3	1800	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
5. Bromoform	U	μg/m3	2700	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
6. Bromomethane	U	μg/m3	1000	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
7.1,3-Butadiene	U	μg/m3	630	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
8.2-Butanone	U	μg/m3	2500	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
\$ 9. Carbon Disulfide	U	μg/m3	13000	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
10. Carbon Tetrachloride	U	μg/m3	1600	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
11. Chlorobenzene	U	μg/m3	1300	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
12. Chloroethane	U	μg/m3	710	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
13. Chloroform	U	μg/m3	530	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
14. Chloromethane	U	μg/m3	920	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
15. Cyclohexane	U	μg/m3	990	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
16. Dibromochloromethane	U	μg/m3	2100	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
17.1,2-Dichlorobenzene	U	μg/m3	2500	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
18.1,3-Dichlorobenzene	U	μg/m3	2500	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
19.1,4-Dichlorobenzene	U	μg/m3	2500	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
20. Dichlorodifluoromethane	U	μg/m3	2200	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
21.1,1-Dichloroethane	1400	μg/m3	460	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
22.1,2-Dichloroethane	U	μg/m3	850	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
23.1,1-Dichloroethene	U	μg/m3	460	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
24. cis-1,2-Dichloroethene	10000	μg/m3	1700	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
25. trans-1,2-Dichloroethene	U	μg/m3	1100	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
26.1,2-Dichloropropane	U	μg/m3	1300	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
27. cis-1,3-Dichloropropene	U	μg/m3	1200	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
28. trans-1,3-Dichloropropene	U	μg/m3	4700	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
29.1,4-Dioxane	U	μg/m3	4300	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
‡ 30. Ethyl Acetate	U	μg/m3	7500	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
31. Ethylbenzene	80000	μg/m3	1300	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
32. Ethylene Dibromide	U	μg/m3	900	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
33. n-Heptane	28000	μg/m3	1200	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
34. Hexachlorobutadiene	U	μg/m3	1300	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
35. n-Hexane	81000	μg/m3	1600	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJF
‡ 36.2-Hexanone	U	μg/m3	1400	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
‡ 37. Isopropanol	U	μg/m3	1000	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP

1914 Holloway Drive 11766 E. Grand River 8660 S. Mackinaw Trail Holt, MI 48842 Brighton, MI 48116 Cadillac, MI 49601 T: (517) 699-0345 T: (810) 220-3300 T: (231) 775-8368



Dale.

Client Identification:	APEX	Sample Description:	Effluent Sample 2	Chain of Custody:	180664
Client Project Name:	Stericycle (11019-000128.02)	Sample No:		Collect Date:	12/17/19
Client Project No:	11019-000128.02	Sample Matrix:	Air	Collect Time:	15:55
Sample Comments:					

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

TO-15 (Tedlar Bag)			Aliquot ID: 94246-003			Matrix: Air				
Method: EPA TO-15				Desc	Description:					
							tion	An	Analysis	
Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	P. Date	P. Batch	A. Date	A. Batch	Init.
38.4-Methyl-2-pentanone	5700		µg/m3	5000	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
39. Methylene Chloride	U		µg/m3	15000	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
‡ 40.2-Methylnaphthalene	U		µg/m3	29000	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
41.MTBE	3000		µg/m3	380	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
‡ 42. Naphthalene	U		µg/m3	4400	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
43. Styrene	U		µg/m3	450	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
44.1,1,2,2-Tetrachloroethane	U		µg/m3	800	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
45. Tetrachloroethene	1500		µg/m3	790	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
‡ 46. Tetrahydrofuran	2100		µg/m3	840	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
47. Toluene	260000		µg/m3	1100	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
48.1,2,4-Trichlorobenzene	U		µg/m3	16000	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
49.1,1,1-Trichloroethane	U		µg/m3	620	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
50.1,1,2-Trichloroethane	U		µg/m3	1400	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
51. Trichloroethene	U		µg/m3	610	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
52. Trichlorofluoromethane	U		µg/m3	660	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
53.1,1,2-Trichlorotrifluoroethane	U		µg/m3	900	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
54.1,2,4-Trimethylbenzene	2800		µg/m3	1400	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
55.1,3,5-Trimethylbenzene	1500		µg/m3	1400	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
56. Vinyl Acetate	U		µg/m3	4100	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
57. Vinyl Chloride	680		µg/m3	640	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
58. m&p-Xylene	240000		µg/m3	980	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
59. o-Xylene	47000		µg/m3	510	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
‡ 60. Xylenes	290000		µg/m3	1500	4200	12/27/19 10:33	VK19L27A	12/27/19 17:56	VK19L27A	MJP
Surrogate Summary 4-Bromofluorobenzene(S) 101			%	<u>Control Limits</u> 80-120	2		<u>atch</u> 9L27A			

Holt, MI 48842 Brighton, MI 48116 Cadillac, MI 49601 T: (517) 699-0345 T: (810) 220-3300 T: (231) 775-8368



#### Definitions/ Qualifiers:

- A: Spike recovery or precision unusable due to dilution.
- **B:** The analyte was detected in the associated method blank.
- E: The analyte was detected at a concentration greater than the calibration range, therefore the result is estimated.
- J: The concentration is an estimated value.
- M: Modified Method
- U: The analyte was not detected at or above the reporting limit.
- X: Matrix Interference has resulted in a raised reporting limit or distorted result.
- W: Results reported on a wet-weight basis.
- \*: Value reported is outside QC limits
- D: The sample or extract was analyzed at a DF greater than 1.

Exception Summary:

#### Analysis Locations:

All analyses performed in Holt.



Accreditation Number(s):

T104704518-19-8 (TX)

1914 Holloway Drive 11766 E. Grand River 8660 S. Mackinaw Trail Holt, MI 48842 Brighton, MI 48116 Cadillac, MI 49601 T: (517) 699-0345 T: (810) 220-3300 T: (231) 775-8368



# VK19L27A: Method Blank (MB)

Run Time: VK19L27A.MB 12/27/2019 13:24 [VK19L	27A]					
	MB Result	MB	MB RDL			
		Qualifier				
Analyte	μg/m3		μg/m3			
Acetone	U		57			
Benzene	U		19			
Benzyl Chloride	U		6.2			
Bromodichloromethane	U		8.0			
Bromoform	U		62			
Bromomethane	U		23			
1,3-Butadiene	U		0.66			
2-Butanone	U		35			
Carbon Disulfide	U		37			
Carbon Tetrachloride	U		7.5			
Chlorobenzene	U		28			
Chloroethane	U		16			
Chloroform	U		5.9			
Chloromethane	U		12			
Cyclohexane	U		41			
Dibromochloromethane	U		4.1			
1,2-Dichlorobenzene	U		36			
1,3-Dichlorobenzene	U		36			
1,4-Dichlorobenzene	U		36			
Dichlorodifluoromethane	U		30			
1,1-Dichloroethane	U		24			
1,2-Dichloroethane	U		4.9			
1,1-Dichloroethene	U		24			
cis-1,2-Dichloroethene	U		24			
trans-1,2-Dichloroethene	U		24			
1,2-Dichloropropane	U		28			
cis-1,3-Dichloropropene	U		27			
trans-1,3-Dichloropropene	U		27			
1,4-Dioxane	U		22			
Ethyl Acetate	U		43			
Ethylbenzene	U		52			
Ethylene Dibromide	U		0.92			
n-Heptane	U		49			
	1914 Holloway Driv 11766 E. Grand Rive 8660 S. Mackinaw T	er	Holt, MI 48842 Brighton, MI 48116 Cadillac, MI 49601	T: (517) 699-0345 T: (810) 220-3300 T: (231) 775-8368	F: (517) 699-0388 F: (810) 220-3311 F: (231) 775-8584	
			la la	h@fibertec.uc		



# VK19L27A: Method Blank (MB)

				ELATON
Run Time: VK19L27A.MB 12/27/2019 13:24	[VK19L27A]			
	MB Result	MB	RDL	
		Qualifier		
Analyte	μg/m3	I	m3	
Hexachlorobutadiene	U	Į		
n-Hexane	U	4		
2-Hexanone	U	4		
Isopropanol	U	:		
4-Methyl-2-pentanone	U	4		
Methylene Chloride	U	4		
2-Methylnaphthalene	U		)	
МТВЕ	U	2		
Naphthalene	U	:		
Styrene	U	ť		
1,1,2,2-Tetrachloroethane	U	;		
Tetrachloroethene	U	4		
Tetrahydrofuran	U	;		
Toluene	U	2		
1,2,4-Trichlorobenzene	U	٤		
1,1,1-Trichloroethane	U	;		
1,1,2-Trichloroethane	U	(		
Trichloroethene	U			
Trichlorofluoromethane	U	;		
1,1,2-Trichlorotrifluoroethane	U	4		
1,2,4-Trimethylbenzene	U	:		
1,3,5-Trimethylbenzene	U	:		
Vinyl Acetate	U	4		
Vinyl Chloride	U			
m&p-Xylene	U	ł		
o-Xylene	U	ł		
4-Bromofluorobenzene(S)	99		120	

1914 Holloway Drive	Holt, MI 48842	T: (517) 699-0345	F: (517) 699-0388	
11766 E. Grand River	Brighton, MI 48116	T: (810) 220-3300	F: (810) 220-3311	
8660 S. Mackinaw Trail	Cadillac, MI 49601	T: (231) 775-8368	F: (231) 775-8584	
DCSID: G-6017.1 (06/04/2019)	lab	@fibertec us	RSN: VK19L27A-193641230154614	



Order D: 94246 Page: 3 of 16 Date: 12/30/19

EPA TO-15

## VK19L27A: Laboratory Control Sample (LCS)/Laboratory Control Sample Duplicate (LCSD)

Run Time: VK19L27A.LCS: 12/27/2019 10:39 [VK19L27A] VK19L27A.LCSD: 12/27/2019 11:33 [VK19L27A]

	LCS	LCS Result	LCS Rec.	Rec. Limits	LCS	LCSD	LCSD	LCSD	LCSD	RPD	RPD Limits	RPD
	Spike Amo	ount			Qualifier	Spike Amount	Result	Rec.	Qualifier			Qualifier
Analyte	μg/m3	µg/m3	%	%		µg/m3	µg/m3	%		%	%	
Acetone	25.8	28.7	111	70-130		25.8	29.3	114		3	20	
Benzene	37.6	36.3	96	70-130		37.6	35.5	94		2	20	
Benzyl Chloride	37.5	39.7	106	70-150		37.5	39.3	105		1	20	
Bromodichloromethane	77.3	79.1	102	70-130		77.3	77.4	100		2	20	
Bromoform	117	110	94	70-138		117	109	93		1	20	
Bromomethane	43.4	42.7	98	70-133		43.4	43.3	100		2	20	
1,3-Butadiene	26.1	23.7	91	70-134		26.1	26.1	100		9	20	
2-Butanone	32.6	32.7	100	70-130		32.6	32.7	101		1	20	
Carbon Disulfide	35.7	34.7	97	70-130		35.7	34.9	98		1	20	
Carbon Tetrachloride	71.8	72.5	101	70-131		71.8	71.0	99		2	20	
Chlorobenzene	54.0	51.7	96	70-130		54.0	51.3	95		1	20	
Chloroethane	29.6	29.7	100	70-130		29.6	29.7	100		0	20	
Chloroform	55.0	53.6	97	70-130		55.0	53.9	98		1	20	
Chloromethane	23.5	24.0	102	70-130		23.5	24.3	104		2	20	
Cyclohexane	40.6	42.7	105	70-130		40.6	41.8	103		2	20	
Dibromochloromethane	95.8	93.0	97	70-135		95.8	92.7	97		0	20	
1,2-Dichlorobenzene	66.8	66.4	99	70-130		66.8	65.3	98		1	20	
1,3-Dichlorobenzene	66.3	67.5	102	70-131		66.3	67.2	101		1	20	
1,4-Dichlorobenzene	66.5	68.5	103	70-134		66.5	68.1	102		1	20	
Dichlorodifluoromethane	56.8	59.5	105	70-132		56.8	59.7	105		0	20	
1,1-Dichloroethane	47.8	46.3	97	70-130		47.8	46.5	97		0	20	
1,2-Dichloroethane	47.8	46.9	98	70-130		47.8	47.2	99		1	20	
1,1-Dichloroethene	48.1	48.5	101	70-133		48.1	48.4	101		0	20	
cis-1,2-Dichloroethene	47.4	46.9	99	70-130		47.4	47.1	99		0	20	
trans-1,2-Dichloroethene	47.4	46.3	98	70-130		47.4	46.3	98		0	20	
1,2-Dichloropropane	54.4	55.6	102	70-130		54.4	54.8	101		1	20	
cis-1,3-Dichloropropene	53.2	56.6	106	70-131		53.2	55.8	105		1	20	
trans-1,3-Dichloropropene	46.3	50.0	108	70-134		46.3	48.8	105		3	20	
1,4-Dioxane	39.4	44.0	112	70-130		39.4	43.1	110		2	20	
Ethyl Acetate	31.8	33.4	105	70-130		31.8	33.2	104		1	20	
Ethylbenzene	50.8	52.4	103	70-130		50.8	51.6	102		1	20	
Ethylene Dibromide	90.1	88.1	98	70-130		90.1	87.1	97		1	20	
n-Heptane	48.3	52.2	108	70-132		48.3	51.1	106		2	20	
	1914 Holloway D 11766 E. Grand R 8660 S. Mackinav	iver	Holt, MI 4884 Brighton, MI Cadillac, MI 4	48116	T: (810)	699-0345 220-3300 775-8368		F: (517) 699-0388 F: (810) 220-3311 F: (231) 775-8584				



EPA TO-15

#### VK19L27A: Laboratory Control Sample (LCS)/Laboratory Control Sample Duplicate (LCSD)

Run Time: VK19L27A.LCS: 12/27/2019 10:39 [VK19L27A] VK19L27A.LCSD: 12/27/2019 11:33 [VK19L27A]

	LCS	LCS Result	LCS Rec.	Rec. Limits	LCS	LCSD	LCSD	LCSD	LCSD	RPD	RPD Limits	RPD
	Spike Amo	ount			Qualifier	Spike Amo	ount Result	Rec.	Qualifier			Qualifier
Analyte	μg/m3	µg/m3	%	%		µg/m3	μg/m3	%		%	%	
Hexachlorobutadiene	109	105	96	70-134		109	107	98		2	20	
n-Hexane	41.9	43.6	104	70-130		41.9	43.2	103		1	20	
2-Hexanone	39.6	40.6	103	70-139		39.6	40.4	102		1	20	
Isopropanol	27.8	28.6	103	54-144		27.8	28.8	104		1	20	
4-Methyl-2-pentanone	41.3	44.3	107	70-130		41.3	44.2	107		0	20	
Methylene Chloride	41.0	40.3	98	70-132		41.0	40.1	98		0	20	
2-Methylnaphthalene	37.7	40.0	106	70-146		37.7	41.4	110		4	20	
MTBE	44.3	46.6	105	70-130		44.3	46.7	105		0	20	
Naphthalene	52.8	57.7	109	70-148		52.8	58.5	111		2	20	
Styrene	49.6	52.4	106	70-130		49.6	51.7	104		2	20	
1,1,2,2-Tetrachloroethane	80.2	77.8	97	70-130		80.2	77.1	96		1	20	
Tetrachloroethene	79.7	77.4	97	70-130		79.7	77.4	97		0	20	
Tetrahydrofuran	34.5	36.1	105	70-138		34.5	36.0	104		1	20	
Toluene	44.6	44.6	100	70-130		44.6	44.1	99		1	20	
1,2,4-Trichlorobenzene	75.0	80.2	107	70-140		75.0	81.3	108		1	20	
1,1,1-Trichloroethane	63.6	63.4	100	70-130		63.6	61.8	97		3	20	
1,1,2-Trichloroethane	63.9	62.5	98	70-130		63.9	61.6	96		2	20	
Trichloroethene	62.4	63.2	101	70-130		62.4	62.1	99		2	20	
Trichlorofluoromethane	66.9	65.1	97	70-132		66.9	65.4	98		1	20	
1,1,2-Trichlorotrifluoroethane	92.1	89.1	97	70-130		92.1	89.5	97		0	20	
1,2,4-Trimethylbenzene	55.0	54.2	99	70-132		55.0	54.2	99		0	20	
1,3,5-Trimethylbenzene	55.2	58.4	106	70-131		55.2	57.5	104		2	20	
/inyl Acetate	33.1	37.1	112	70-131		33.1	36.4	110		2	20	
/inyl Chloride	29.6	30.8	104	70-131		29.6	33.3	112		7	20	
n&p-Xylene	104	98.6	95	70-130		104	97.6	94		1	20	
o-Xylene	50.6	51.1	101	70-130		50.6	50.2	99		2	20	
4-Bromofluorobenzene(S)			104	80-120				104				

1914 Holloway Drive
11766 E. Grand River
8660 S. Mackinaw Trail

Holt, MI 48842 Brighton, MI 48116 Cadillac, MI 49601 T: (517) 699-0345 T: (810) 220-3300 T: (231) 775-8368

F: (517) 699-0388 F: (810) 220-3311 F: (231) 775-8584



EPA 8260D

## VM19L23A: Method Blank (MB)

Run Time: VM19L23A.MB 12/23/2019 13:25 [VM19	)L23A]		
	MB Result	MB	MB RDL
		Qualifier	
Analyte	μg/L		μg/L
Acetone	U		20
t-Butanol	U		50
2-Butanone	U		5.0
cis-1,2-Dichloroethene	U		1.0
Ethylbenzene	U		1.0
4-Methyl-2-pentanone	U		5.0
МТВЕ	U		1.0
Tetrahydrofuran	U		5.0
Toluene	U		1.0
1,2,4-Trimethylbenzene	U		1.0
m&p-Xylene	U		2.0
o-Xylene	U		1.0
4-Bromofluorobenzene(S)	101		80-120
Dibromofluoromethane(S)	104		80-120
1,2-Dichloroethane-d4(S)	99		80-120
Toluene-d8(S)	101		80-120

1914 Holloway Drive 11766 E. Grand River 8660 S. Mackinaw Trail Holt, MI 48842 Brighton, MI 48116 Cadillac, MI 49601 T: (517) 699-0345 T: (810) 220-3300 T: (231) 775-8368 F: (517) 699-0388 F: (810) 220-3311 F: (231) 775-8584



EPA 8260D

## VM19L23A: Laboratory Control Sample (LCS)/Laboratory Control Sample Duplicate (LCSD)

Run Time: VM19L23A.LCS: 12/23/2019 11:12 [VM19L23A] VM19L23A.LCSD: 12/23/2019 11:38 [VM19L23A]

	LCS	LCS Result	LCS Rec.	Rec. Limits	LCS	LCSD	LCSD	LCSD	LCSD	RPD	<b>RPD</b> Limits	RPD
	Spike Amour	nt			Qualifier	Spike Amour	nt Result	Rec.	Qualifier			Qualifier
Analyte	µg/L	μg/L	%	%		μg/L	μg/L	%		%	%	
Acetone	50.0	45.5	91	54-140		50.0	46.9	94		3	20	
t-Butanol	250	268	107	70-147		250	260	104		3	20	
2-Butanone	50.0	48.0	96	70-148		50.0	47.3	95		1	20	
cis-1,2-Dichloroethene	50.0	46.4	93	70-125		50.0	44.2	88		6	20	
Ethylbenzene	50.0	46.9	94	80-120		50.0	43.7	87		8	20	
4-Methyl-2-pentanone	50.0	50.5	101	70-130		50.0	50.1	100		1	20	
MTBE	50.0	48.4	97	70-125		50.0	47.3	95		2	20	
Tetrahydrofuran	50.0	48.6	97	70-131		50.0	47.7	95		2	20	
Toluene	50.0	47.0	94	80-120		50.0	44.6	89		5	20	
1,2,4-Trimethylbenzene	50.0	45.9	92	75-130		50.0	43.9	88		4	20	
m&p-Xylene	100	94.8	95	75-130		100	89.0	89		7	20	
o-Xylene	50.0	46.1	92	80-120		50.0	44.1	88		4	20	
4-Bromofluorobenzene(S)			102	80-120				101				
Dibromofluoromethane(S)			102	80-120				103				
1,2-Dichloroethane-d4(S)			99	80-120				98				
Toluene-d8(S)			99	80-120				100				

1914 Holloway Drive 11766 E. Grand River 8660 S. Mackinaw Trail Holt, MI 48842 Brighton, MI 48116 Cadillac, MI 49601 T: (517) 699-0345 T: (810) 220-3300 T: (231) 775-8368 F: (517) 699-0388 F: (810) 220-3311 F: (231) 775-8584



# VN19L26A: Method Blank (MB)

	MB Result ME				
	Qu	alifier			
nalyte	μg/m3	μg/m3			
cetone	U	57			
Benzene	U	19			
Benzyl Chloride	U	6.2			
Bromodichloromethane	U	8.0			
Bromoform	U	62			
Bromomethane	U	23			
,3-Butadiene	U	0.66			
-Butanone	U	35			
Carbon Disulfide	U	37			
Carbon Tetrachloride	U	7.5			
Chlorobenzene	U	28			
Chloroethane	U	16			
Chloroform	U	5.9			
Chloromethane	U	12			
Cyclohexane	U	41			
Dibromochloromethane	U	4.1			
,2-Dichlorobenzene	U	36			
,3-Dichlorobenzene	U	36			
,4-Dichlorobenzene	U	36			
Dichlorodifluoromethane	U	30			
,1-Dichloroethane	U	24			
,2-Dichloroethane	U	4.9			
,1-Dichloroethene	U	24			
is-1,2-Dichloroethene	U	24			
rans-1,2-Dichloroethene	U	24			
,2-Dichloropropane	U	28			
is-1,3-Dichloropropene	U	27			
rans-1,3-Dichloropropene	U	27			
,4-Dioxane	U	22			
thyl Acetate	U	43			
thylbenzene	U	52			
thylene Dibromide	U	0.92			
-Heptane	U	49			
	1914 Holloway Drive 11766 E. Grand River 8660 S. Mackinaw Trail	Holt, MI 48842 Brighton, MI 48116 Cadillac, MI 49601	T: (517) 699-0345 T: (810) 220-3300 T: (231) 775-8368	F: (517) 699-0388 F: (810) 220-3311 F: (231) 775-8584	



# VN19L26A: Method Blank (MB)

					LIA IO-I
Run Time: VN19L26A.MB 12/26/2019 13:28	3 [VN19L26A]				
	MB Result	MB	/IB RDL		
		Qualifier			
Analyte	μg/m3		ıg/m3		
Hexachlorobutadiene	U		i.1		
n-Hexane	U		2		
2-Hexanone	U		9		
Isopropanol	U		29		
4-Methyl-2-pentanone	U		9		
Methylene Chloride	U		2		
2-Methylnaphthalene	U		40		
MTBE	U		2		
Naphthalene	U		28		
Styrene	U		51		
1,1,2,2-Tetrachloroethane	U		3.3		
Tetrachloroethene	U		1		
Tetrahydrofuran	U		3.5		
1,2,4-Trichlorobenzene	U		9		
1,1,1-Trichloroethane	U		3		
1,1,2-Trichloroethane	U		5.5		
Trichloroethene	U		.6		
Trichlorofluoromethane	U		34		
1,1,2-Trichlorotrifluoroethane	U		6		
1,2,4-Trimethylbenzene	U		9		
1,3,5-Trimethylbenzene	U		9		
Vinyl Acetate	U		2		
Vinyl Chloride	U		5		
m&p-Xylene	U		52		
o-Xylene	U		2		
4-Bromofluorobenzene(S)	101		30-120		

1914 Holloway Drive	Holt, MI 48842	T: (517) 699-0345	F: (517) 699-0388	
11766 E. Grand River	Brighton, MI 48116	T: (810) 220-3300	F: (810) 220-3311	
8660 S. Mackinaw Trail	Cadillac, MI 49601	T: (231) 775-8368	F: (231) 775-8584	
DCSID: G-6017.1 (06/04/2019)	lab	@fibertec us	RSN: VN19L26A-193641230154614	



Order D: 94246 Page: 9 of 16 Date: 12/30/19

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#### VN19L26A: Laboratory Control Sample (LCS)/Laboratory Control Sample Duplicate (LCSD)

Run Time: VN19L26A.LCS: 12/26/2019 10:41 [VN19L26A] VN19L26A.LCSD: 12/26/2019 11:35 [VN19L26A]

	LCS	LCS Result	LCS Rec.	Rec. Limits	LCS	LCSD	LCSD	LCSD	LCSD	RPD	RPD Limits	RPD
	Spike Amo	ount			Qualifier	Spike Amoun	t Result	Rec.	Qualifier			Qualifier
Analyte	μg/m3	μg/m3	%	%		µg/m3	µg/m3	%		%	%	
Acetone	25.8	28.6	111	70-130		25.8	28.4	110		1	20	
Benzene	37.6	32.5	86	70-130		37.6	32.4	86		0	20	
Benzyl Chloride	37.5	38.8	104	70-150		37.5	38.5	103		1	20	
Bromodichloromethane	77.3	70.4	91	70-130		77.3	69.8	90		1	20	
Bromoform	117	140	120	70-138		117	142	122		2	20	
Bromomethane	43.4	40.7	94	70-133		43.4	40.9	94		0	20	
1,3-Butadiene	26.1	33.7	129	70-134		26.1	33.7	129		0	20	
2-Butanone	32.6	27.1	83	70-130		32.6	26.3	81		2	20	
Carbon Disulfide	35.7	29.9	84	70-130		35.7	29.7	83		1	20	
Carbon Tetrachloride	71.8	71.2	99	70-131		71.8	71.6	100		1	20	
Chlorobenzene	54.0	54.3	101	70-130		54.0	54.7	101		0	20	
Chloroethane	29.6	24.8	84	70-130		29.6	24.8	84		0	20	
Chloroform	55.0	50.5	92	70-130		55.0	50.3	91		1	20	
Chloromethane	23.5	17.4	74	70-130		23.5	17.1	73		1	20	
Cyclohexane	40.6	35.2	87	70-130		40.6	34.9	86		1	20	
Dibromochloromethane	95.8	100	104	70-135		95.8	102	106		2	20	
1,2-Dichlorobenzene	66.8	71.7	107	70-130		66.8	71.8	107		0	20	
1,3-Dichlorobenzene	66.3	75.7	114	70-131		66.3	76.0	115		1	20	
1,4-Dichlorobenzene	66.5	77.0	116	70-134		66.5	76.9	116		0	20	
Dichlorodifluoromethane	56.8	53.8	95	70-132		56.8	53.6	94		1	20	
1,1-Dichloroethane	47.8	39.4	82	70-130		47.8	39.0	82		0	20	
1,2-Dichloroethane	47.8	42.5	89	70-130		47.8	41.9	88		1	20	
1,1-Dichloroethene	48.1	41.8	87	70-133		48.1	41.4	86		1	20	
cis-1,2-Dichloroethene	47.4	41.0	87	70-130		47.4	40.6	86		1	20	
trans-1,2-Dichloroethene	47.4	40.3	85	70-130		47.4	39.9	84		1	20	
1,2-Dichloropropane	54.4	46.3	85	70-130		54.4	45.9	84		1	20	
cis-1,3-Dichloropropene	53.2	50.1	94	70-131		53.2	50.2	94		0	20	
trans-1,3-Dichloropropene	46.3	44.0	95	70-134		46.3	43.9	95		0	20	
1,4-Dioxane	39.4	37.8	96	70-130		39.4	37.1	94		2	20	
Ethyl Acetate	31.8	26.5	83	70-130		31.8	25.8	81		2	20	
Ethylbenzene	50.8	51.9	102	70-130		50.8	52.1	103		1	20	
Ethylene Dibromide	90.1	90.8	101	70-130		90.1	91.6	102		1	20	
n-Heptane	48.3	40.3	83	70-132		48.3	39.4	82		1	20	
	1914 Holloway D 11766 E. Grand R 8660 S. Mackinav	liver	Holt, MI 4884 Brighton, MI Cadillac, MI 4	48116	T: (810)	699-0345 220-3300 775-8368		F: (517) 699-0388 F: (810) 220-3311 F: (231) 775-8584				



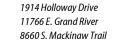
Order D: 94246 Page: 10 of 16 Date: 12/30/19

EPA TO-15

#### VN19L26A: Laboratory Control Sample (LCS)/Laboratory Control Sample Duplicate (LCSD)

Run Time: VN19L26A.LCS: 12/26/2019 10:41 [VN19L26A] VN19L26A.LCSD: 12/26/2019 11:35 [VN19L26A]

	LCS	LCS Result	LCS Rec.	Rec. Limits	LCS	LCSD	LCSD	LCSD	LCSD	RPD	RPD Limits	RPD
	Spike Amo	unt			Qualifier	Spike Amou	Int Result	Rec.	Qualifier			Qualifier
Analyte	μg/m3	μg/m3	%	%		µg/m3	µg/m3	%		%	%	
Hexachlorobutadiene	109	128	117	70-134		109	129	118		1	20	
n-Hexane	41.9	36.0	86	70-130		41.9	35.5	85		1	20	
2-Hexanone	39.6	33.6	85	70-139		39.6	32.7	83		2	20	
Isopropanol	27.8	25.5	92	54-144		27.8	24.7	89		3	20	
4-Methyl-2-pentanone	41.3	36.7	89	70-130		41.3	35.9	87		2	20	
Methylene Chloride	41.0	31.0	76	70-132		41.0	30.6	75		1	20	
2-Methylnaphthalene	37.7	38.3	102	70-146		37.7	40.4	107		5	20	
MTBE	44.3	42.8	97	70-130		44.3	42.5	96		1	20	
Naphthalene	52.8	62.3	118	70-148		52.8	63.0	119		1	20	
Styrene	49.6	53.6	108	70-130		49.6	53.8	109		1	20	
1,1,2,2-Tetrachloroethane	80.2	79.3	99	70-130		80.2	78.8	98		1	20	
Tetrachloroethene	79.7	83.4	105	70-130		79.7	84.6	106		1	20	
Tetrahydrofuran	34.5	27.0	78	70-138		34.5	26.2	76		3	20	
1,2,4-Trichlorobenzene	75.0	75.6	101	70-140		75.0	76.5	102		1	20	
1,1,1-Trichloroethane	63.6	60.6	95	70-130		63.6	60.5	95		0	20	
1,1,2-Trichloroethane	63.9	59.5	93	70-130		63.9	60.3	94		1	20	
Trichloroethene	62.4	60.0	96	70-130		62.4	60.0	96		0	20	
Trichlorofluoromethane	66.9	68.7	103	70-132		66.9	68.4	102		1	20	
1,1,2-Trichlorotrifluoroethane	92.1	85.5	93	70-130		92.1	85.1	92		1	20	
1,2,4-Trimethylbenzene	55.0	58.2	106	70-132		55.0	58.3	106		0	20	
1,3,5-Trimethylbenzene	55.2	59.6	108	70-131		55.2	59.8	108		0	20	
Vinyl Acetate	33.1	32.4	98	70-131		33.1	32.2	97		1	20	
Vinyl Chloride	29.6	37.1	125	70-131		29.6	37.4	126		1	20	
m&p-Xylene	104	104	100	70-130		104	105	101		1	20	
o-Xylene	50.6	52.1	103	70-130		50.6	52.2	103		0	20	
4-Bromofluorobenzene(S)			112	80-120				115				



Holt, MI 48842 Brighton, MI 48116 Cadillac, MI 49601 T: (517) 699-0345 T: (810) 220-3300 T: (231) 775-8368

F: (517) 699-0388 F: (810) 220-3311 F: (231) 775-8584



#### VN19L27A: Method Blank (MB) EPA TO-15 Run Time: VN19L27A.MB 12/27/2019 13:18 [VN19L27A] MB Result MB MB RDL Qualifier Analyte µg/m3 µg/m3 Toluene U 23 4-Bromofluorobenzene(S) 100 80-120 VN19L27A: Laboratory Control Sample (LCS)/Laboratory Control Sample Duplicate (LCSD) EPA TO-15

Run Time: VN19L27A.LCS: 12/27/2019 10:	31 [VN19L27A] VN19L	_27A.LCSD: 12/27	/2019 11:25 [VN	V19L27A]								
	LCS	LCS Result	LCS Rec.	Rec. Limits	LCS	LCSD	LCSD	LCSD	LCSD	RPD	RPD Limits	RPD
	Spike Amo	ount			Qualifier	Spike Amo	ount Result	Rec.	Qualifier			Qualifier
Analyte	μg/m3	μg/m3	%	%		µg/m3	µg/m3	%		%	%	
Toluene	44.6	46.1	103	70-130		44.6	46.0	103		0	20	
4-Bromofluorobenzene(S)			114	80-120				115				

1914 Holloway DriveHolt, MI 48842T:11766 E. Grand RiverBrighton, MI 48116T:8660 S. Mackinaw TrailCadillac, MI 49601T:

T: (517) 699-0345 T: (810) 220-3300 T: (231) 775-8368 F: (517) 699-0388 F: (810) 220-3311 F: (231) 775-8584



**Diethyl Ether** 

VP19L20A: Method Blank (MB)

Run Time: VP19L20A.MB 12/20/2019 12:02 [VP19L20A]

EPA 8260D

#### MB Result MB MB RDL Qualifier Analyte μg/L μg/L Acrylonitrile U 5.0 U 1.0 Benzene Bromobenzene U 1.0 U Bromochloromethane 1.0 Bromodichloromethane U 1.0 Bromoform U 1.0 Bromomethane U 5.0 n-Butylbenzene U 1.0 sec-Butylbenzene U 1.0 U tert-Butylbenzene 1.0 U Carbon Disulfide 1.0 Carbon Tetrachloride U 1.0 U Chlorobenzene 1.0 Chloroethane U 5.0 U Chloroform 1.0 Chloromethane U 5.0 Cyclohexane U 5.0 1,2-Dibromo-3-chloropropane (S M) U 5.0 U Dibromochloromethane 1.0 Dibromomethane U 1.0 trans-1,4-Dichloro-2-butene (SIM) U 5.0 U 1,2-Dichlorobenzene 1.0 U 1,3-Dichlorobenzene 1.0 U 1.4-Dichlorobenzene 1.0 Dichlorodifluoromethane U 5.0 1,1-Dichloroethane U 1.0 1.2-Dichloroethane U 1.0 U 1,1-Dichloroethene 1.0 U trans-1,2-Dichloroethene 1.0 U 1.2-Dichloropropane 1.0 cis-1,3-Dichloropropene U 0.50 U trans-1,3-Dichloropropene 0.50

1914 Holloway Drive 11766 E. Grand River 8660 S. Mackinaw Trail 5.0

Holt, MI 48842

Brighton, MI 48116

Cadillac, MI 49601

T: (517) 699-0345 T: (810) 220-3300 T: (231) 775-8368 F: (517) 699-0388 F: (810) 220-3311 F: (231) 775-8584

U



EPA 8260D

#### VP19L20A: Method Blank (MB)

VF19L20A. WELHOU DIAHK (WD)				EFA 02001
Run Time: VP19L20A.MB 12/20/2019 12:0	2 [VP19L20A]			
	MB Result	MB M	3 RDL	
		Qualifier		
Analyte	μg/L	μ	L	
Diisopropyl Ether	U	5.		
ETBE	U	5.		
Ethylene Dibromide	U	1.		
Hexachloroethane	U	5.		
2-Hexanone	U	5.		
Isopropylbenzene	U	1.		
4-Isopropyltoluene	U	1.		
Methylene Chloride	U	5.		
2-Methylnaphthalene	U	5.		
Naphthalene	U	5.		
n-Propylbenzene	U	1.		
Styrene	U	1.		
TAME	U	5.		
1,1,1,2-Tetrachloroethane	U	1.		
1,1,2,2-Tetrachloroethane	U	1.		
Tetrachloroethene	U	1.		
1,2,3-Trichlorobenzene	U	5.		
1,2,4-Trichlorobenzene	U	5.		
1,1,1-Trichloroethane	U	1.		
1,1,2-Trichloroethane	U	1.		
Trichloroethene	U	1.		
Trichlorofluoromethane	U	1.		
1,2,3-Trichloropropane	U	1.		
1,2,3-Trimethylbenzene	U	1.		
1,3,5-Trimethylbenzene	U	1.		
Vinyl Chloride	U	1.		
4-Bromofluorobenzene(S)	102	8	-120	
Dibromofluoromethane(S)	105	8	-120	
1,2-Dichloroethane-d4(S)	108	8	-120	
Toluene-d8(S)	101	8	-120	

1914 Holloway Drive	Holt, MI 48842	T: (517) 699-0345	F: (517) 699-0388
11766 E. Grand River	Brighton, MI 48116	T: (810) 220-3300	F: (810) 220-3311
8660 S. Mackinaw Trail	Cadillac, MI 49601	T: (231) 775-8368	F: (231) 775-8584



Order D: 94246 Page: 14 of 16 Date: 12/30/19

EPA 8260D

## VP19L20A: Laboratory Control Sample (LCS)/Laboratory Control Sample Duplicate (LCSD)

Run Time: VP19L20A.LCS: 12/20/2019 10:44 [VP19L20A] VP19L20A.LCSD: 12/20/2019 11:10 [VP19L20A]

	LCS	LCS Result	LCS Rec.	Rec. Limits	LCS	LCSD	LCSD	LCSD	LCSD	RPD	<b>RPD</b> Limits	RPD
	Spike Ame	ount			Qualifier	Spike Amount	t Result	Rec.	Qualifier			Qualifier
Analyte	μg/L	μg/L	%	%		μg/L	μg/L	%		%	%	
Acrylonitrile	50.0	52.9	106	70-130		50.0	51.9	104		2	20	
Benzene	50.0	49.9	100	80-120		50.0	48.2	96		4	20	
Bromobenzene	50.0	48.3	97	75-125		50.0	54.0	108		11	20	
Bromochloromethane	50.0	54.9	110	70-130		50.0	55.2	110		0	20	
Bromodichloromethane	50.0	51.4	103	75-120		50.0	50.4	101		2	20	
Bromoform	50.0	49.1	98	70-130		50.0	49.0	98		0	20	
Bromomethane	50.0	60.6	121	68-135		50.0	59.4	119		2	20	
n-Butylbenzene	50.0	55.0	110	70-133		50.0	52.1	104		6	20	
sec-Butylbenzene	50.0	53.2	106	70-125		50.0	50.9	102		4	20	
tert-Butylbenzene	50.0	51.2	102	70-130		50.0	49.2	98		4	20	
Carbon Disulfide	50.0	51.8	104	70-130		50.0	49.2	98		6	20	
Carbon Tetrachloride	50.0	50.9	102	70-130		50.0	48.6	97		5	20	
Chlorobenzene	50.0	48.6	97	80-120		50.0	47.7	95		2	20	
Chloroethane	50.0	50.6	101	61-130		50.0	48.6	97		4	20	
Chloroform	50.0	53.0	106	80-120		50.0	51.4	103		3	20	
Chloromethane	50.0	46.7	93	67-125		50.0	44.4	89		4	20	
Cyclohexane	50.0	49.3	99	70-130		50.0	47.1	94		5	20	
1,2-Dibromo-3-chloropropane (S M)	50.0	46.5	93	70-130		50.0	45.2	90		3	20	
Dibromochloromethane	50.0	48.2	96	70-130		50.0	47.3	95		1	20	
Dibromomethane	50.0	46.3	93	75-125		50.0	45.3	91		2	20	
trans-1,4-Dichloro-2-butene (SIM)	50.0	62.8	126	70-135		50.0	60.4	121		4	20	
1,2-Dichlorobenzene	50.0	47.0	94	70-120		50.0	46.7	93		1	20	
1,3-Dichlorobenzene	50.0	49.3	99	75-125		50.0	47.9	96		3	20	
1,4-Dichlorobenzene	50.0	48.7	97	75-125		50.0	47.8	96		1	20	
Dichlorodifluoromethane	50.0	44.9	90	70-136		50.0	42.5	85		6	20	
1,1-Dichloroethane	50.0	54.0	108	70-130		50.0	52.1	104		4	20	
1,2-Dichloroethane	50.0	50.3	101	70-130		50.0	49.9	100		1	20	
1,1-Dichloroethene	50.0	55.4	111	78-120		50.0	52.6	105		6	20	
trans-1,2-Dichloroethene	50.0	59.4	119	70-130		50.0	57.0	114		4	20	
1,2-Dichloropropane	50.0	55.8	112	80-121		50.0	54.6	109		3	20	
cis-1,3-Dichloropropene	50.0	53.5	107	70-130		50.0	52.6	105		2	20	
trans-1,3-Dichloropropene	50.0	53.7	107	70-132		50.0	53.0	106		1	20	
Diethyl Ether	50.0	49.8	100	70-130		50.0	49.5	99		1	20	
	1914 Holloway L 11766 E. Grand I 8660 S. Mackina	River	Holt, MI 4884 Brighton, MI Cadillac, MI 4	48116	T: (810)	599-0345 220-3300 775-8368		F: (517) 699-0388 F: (810) 220-3311 F: (231) 775-8584				



Order D: 94246 Page: 15 of 16 Date: 12/30/19

EPA 8260D

#### VP19L20A: Laboratory Control Sample (LCS)/Laboratory Control Sample Duplicate (LCSD)

Run Time: VP19L20A.LCS: 12/20/2019 10:44 [VP19L20A] VP19L20A.LCSD: 12/20/2019 11:10 [VP19L20A]

				- · · ·								
	LCS	LCS Result	LCS Rec.	Rec. Limits	LCS	LCSD	LCSD	LCSD	LCSD	RPD	RPD Limits	RPD
	Spike Amo				Qualifier	Spike Amou		Rec.	Qualifier			Qualifier
Analyte	μg/L	μg/L	%	%		μg/L	μg/L	%		%	%	
Diisopropyl Ether	50.0	50.4	101	70-134		50.0	49.9	100		1	20	
ETBE	50.0	55.8	112	70-130		50.0	55.7	111		1	20	
Ethylene Dibromide	50.0	49.7	99	80-120		50.0	49.7	99		0	20	
Hexachloroethane	50.0	49.6	99	70-130		50.0	48.2	96		3	20	
2-Hexanone	50.0	50.7	101	70-130		50.0	49.9	100		1	20	
Isopropylbenzene	50.0	52.1	104	75-125		50.0	50.1	100		4	20	
4-Isopropyltoluene	50.0	53.4	107	70-135		50.0	51.0	102		5	20	
Methylene Chloride	50.0	57.0	114	70-130		50.0	55.8	112		2	20	
2-Methylnaphthalene	50.0	49.6	99	70-130		50.0	49.1	98		1	20	
Naphthalene	50.0	51.3	103	70-130		50.0	50.3	101		2	20	
n-Propylbenzene	50.0	53.8	108	70-130		50.0	54.1	108		0	20	
Styrene	50.0	53.5	107	70-130		50.0	52.5	105		2	20	
TAME	50.0	50.0	100	70-130		50.0	49.9	100		0	20	
1,1,1,2-Tetrachloroethane	50.0	49.4	99	80-130		50.0	49.2	98		1	20	
1,1,2,2-Tetrachloroethane	50.0	54.7	109	70-130		50.0	53.5	107		2	20	
Tetrachloroethene	50.0	47.6	95	70-130		50.0	45.9	92		3	20	
1,2,3-Trichlorobenzene	50.0	48.4	97	70-130		50.0	48.2	96		1	20	
1,2,4-Trichlorobenzene	50.0	48.9	98	70-130		50.0	47.4	95		3	20	
1,1,1-Trichloroethane	50.0	52.8	106	70-130		50.0	51.3	103		3	20	
1,1,2-Trichloroethane	50.0	49.9	100	75-125		50.0	49.7	99		1	20	
Trichloroethene	50.0	48.7	97	71-125		50.0	46.6	93		4	20	
Trichlorofluoromethane	50.0	48.2	96	70-133		50.0	45.7	91		5	20	
1,2,3-Trichloropropane	50.0	49.9	100	75-125		50.0	49.3	99		1	20	
1,2,3-Trimethylbenzene	50.0	52.1	104	70-130		50.0	50.5	101		3	20	
1,3,5-Trimethylbenzene	50.0	52.2	104	75-130		50.0	50.1	100		4	20	
Vinyl Chloride	50.0	46.0	92	74-125		50.0	44.1	88		4	20	
4-Bromofluorobenzene(S)			103	80-120				103				
Dibromofluoromethane(S)			105	80-120				105				
1,2-Dichloroethane-d4(S)			104	80-120				104				
Toluene-d8(S)			103	80-120				103				

1914 Holloway Drive 11766 E. Grand River 8660 S. Mackinaw Trail Holt, MI 48842 Brighton, MI 48116 Cadillac, MI 49601 T: (517) 699-0345 T: (810) 220-3300 T: (231) 775-8368 F: (517) 699-0388 F: (810) 220-3311 F: (231) 775-8584



#### **Definitions/ Qualifiers:**

- U: The analyte was not detected at or above the Reporting Limit (RL).
- \*: Value reported is outside QC limits

#### Exception Summary:

Exceptions have been properly noted on reported results or affected samples have been scheduled for reanalysis when appropriate.

**Report Generated By:** 

Stephan . Wallan

By Stephannie Wallace at 3:47 PM, Dec 30, 2019

1914 Holloway Drive	
11766 E. Grand River	
8660 S. Mackinaw Trail	

Holt, MI 48842 Brighton, MI 48116 Cadillac, MI 49601 T: (517) 699-0345 T: (810) 220-3300 T: (231) 775-8368 F: (517) 699-0388 F: (810) 220-3311 F: (231) 775-8584

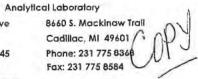
lab@fibertec us

RSN: VP19L20A-193641230154614

Fibertec       1914 Holloway Drive       8660 S. Mackinaw Trail         Holt, MI 48842       Cadillac, MI 49601         Phone: 517 699 0345       Phone: 231 775 8368         Fax: 517 699 0388       Fax: 231 775 8584         email: lab@fibertec.us       Fax: 231 775 8584				19 Ha Ph Fa	dustrial Hyglene Serv 14 Holloway Drive olt, MI 48842 tone: 517 699 0345 tx: 517 699 0382 nail: asbestos@fiberte		1170 Brigi Pho	pprobe 56 E. Grand River Rd. hton, MI 48116 ne: 810 220 3300 810 220 3311	Chain of Custody # 180664 PAGE of
Client Name: APEX			1		PARAME	TERS		Matrix Code	Deliverables
Contact Person: KELLIE WING								S Soil GW Ground Wate	er Level 2
Project Name/ Number: STERICYCLE- PERLY UNEM 11019-00128	cobej		260)	5)			PLE	A Air sw Surface Water	Level 3 Level 4
Email distribution list: KELLIE. WNGC APEX COS. WM	CHI CORNER FOR	# OF CONTAINERS	(826	1-0-1			HOLD SAMPLE	P wipe x Other: Specif	y EDD
Quote#	(SEE RIC	ONTA	5	3					
Purchase Order#	MATRIX	DF CO	VOC	100				· · · · · · · · · · · · · · · · · · ·	- 1
Date Time Sample # Client Sample Descriptor	WW		2	1			-	Remarks:	
12.1619 5:15 Pm EXTRACTED GROUNDWITTER	N	3	X						
12-17-19 9:11 AM EFFLUENT SAMPLE 1	A	1	-	X					
12.17-19 3:55 PM ECFWENT JAMPLE 2	A	1		X					
	-							Received B	1624
								380 16-2	
		-	-				+	Initials:	
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Comments: PLEASE USE PARAMETER LIST SPECIFIED FO									
Sampled/Relinquished By: Relinquished By:		2/11m		9	9:15A Receiv	ed By: ·	A	ett	1/1 2121
Relinquished By:	112		21	19	3:43 Receiv	ed By Labordfor	1. 3	LAB USE ONLY	8/19 2:30
1 bus. day2 bus. days3 bus. days	_	_41	DU5. C	days	erms and con	Tem;		oject number: 94296 re upon receipt at Lab:	



And 1914 Holloway Drive Holt, MI 48842 Phone: 517 699 0345 Fax: 517 699 0388 email: lab@fibertec.us



Industrial Hyglene Services, Inc. 1914 Holloway Drive Holt, MI 48842 Phone: 517 699 0345 Fax: 517 699 0382 email: asbestos@fibertecihs.com Geoprobe 11766 E. Grand River Rd. Brighton, MI 48116 Phone: 810 220 3300 Fax: 810 220 3311



Client Nam	e: APE	x								P,	ARAMETE	RS				Matrix Cod	le		Deliverables
Contact Pe	rson: KE	LIEN	ING						1.100					S	Soil	GW G	round Water		Level 2
Project Nar	ne/ Number:	STERIC 11019	+CLE - FERLA - CO128	LATEM		(BOOS		(0	1				J.E	-	Air Oil	1	urface Water Vaste Water		Level 3 Level 4
Email distrib		LIE . WA	NGC APEXC	os. wm ·	e	HT CORNER FOR C	# OF CONTAINERS	(8260)	(10-15				HOLD SAMPLE	P	Wipe	X C	Other: Specify		EDD
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Purchase C			-		-	ATRIX	OFC	10	VOL										
Date	Time	Sample #	C	lient Sample De	escriptor			5	-	-	-		-	Ke	marks:				
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12-17-19	3:55 Pa		EFFWENT	JAMAE	2	A	1		$\wedge$	1.1	-		-	-					
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Comments		PLEASE	USE PARATA	ALL HIL	SE VOC-	BVI	il y	to C	it p	20 JELT 12-19-	7	Past F	ry	jec	ct A	ad F	Full /13	t VOC	S
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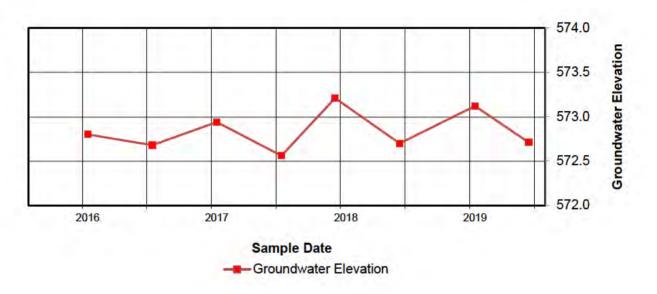


APPENDIX D

HISTORICAL GROUNDWATER ELEVATIONS IN WELL MW-11

**MW-11** 

MW-11								
Date	Groundwater Elevation							
Jun-16	572.80							
Dec-16	572.68							
Jun-17	572.94							
Dec-17	572.56							
May-18	573.21							
Nov-18	572.70							
Jun-19	573.12							
Nov-19	572.71							





APPENDIX E

TYPICAL MPE PROCESS FLOW DIAGRAM

