

2012 Facilities Audit

New Jersey TSD Facility

217 South First Street
Elizabeth, NJ 07206
908-355-5800
FAX: 908-355-0562

Pennsylvania TSD Facility

550 Industrial Drive
Lewisberry, PA 17339
717-938-4700
FAX: 717-938-3301

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History



Clean Venture, Inc. (CVI) is an environmental contractor dedicated to the proper handling, transporting and disposal of oil/hazardous materials for both emergency and planned events. Responses are made to both waterside and landside incidents, predominantly in the Mid-Atlantic and New England States. **CVI** operates out of Framingham, MA, Stamford, CT, Elizabeth and Clayton, NJ, Baltimore, MD and our newly acquired Quantico, MD location.

Cycle Chem, Inc. (CCI) was incorporated in 1984. Its primary goal was to locate and purchase a facility licensed to perform disposal of hazardous waste materials to compliment the services **CVI** offered. In October of 1985, the owners of **CCI** purchased the Perk Chemical Company. Perk Chemical's business was the distribution and reclamation of virgin and reclaimed solvents.

With the passing of the RCRA legislation the owners of Perk Chemical were required to submit application for permits to treat, store and reclaim hazardous wastes and hazardous materials. The owners of Perk Chemical recognizing the shrinking market for halogenated solvents, sold the facility and its temporary operating permits to **CCI** in October of 1988.

In 1993, **CCI** initiated a major construction upgrade project on its entire facility. Included with this project was an expansion of the tank farm, and fuels blending operation, installation of a bulk solids consolidation-solidification facility, re-paving of the entire waste process area and other significant changes. These facility upgrades were completed in 1995. With these improvements and further permit expansion in the early 1990's, **CCI** is one of the most versatile and modern operations of its type in the northeastern United States.

CCI has the ability to provide flexibility with final treatment technologies consistent with Federal regulations and client needs. **CCI** performs both chemical and physical treatments; blending/mixing, crushing and compacting, straining, decanting, bulking/consolidation/lab packs, metals contaminated materials stabilization, solidification, D001 sludge grinding, fluidization, separation, adjusting pH, reactive sulfides and hydration - oxidizers. Rapid response to pricing and approval requests is part of the standard service offered.

Specialized services for generators whom may require more attention than consultants or contractors, is also provided on a daily basis by our highly trained field staff. Our strengths, in short, are fast approvals turnaround, competitive pricing, flexibility with disposal options/technologies, and financial stability.

CCI possesses the necessary permits to dispose of the most difficult and varied waste streams. We believe our Part "B" is unequalled in terms of its flexibility, variety and storage capacity. **CCI** also maintains a fully functional state certified laboratory on site to support the facility waste analysis plan and provides specialized testing services to clients.

In August of 1999, **CCI** expanded geographically by purchasing a second fully permitted, Part "B" Treatment, Storage and Disposal facility. This facility is located in Lewisberry, PA. The 10-acre facility is capable of storing approximately 900,000 gallons of hazardous and non-hazardous waste and offers our customers increased waste disposal alternatives and greater service area coverage.



In January of 2007 our family of companies grew once again as a result of the acquisition of two companies and subsequent formation of **Envirotech Consultants, LLC**. Envirotech has offices in Elizabeth, NJ and Baltimore, MD. They provide cost-effective and creative solutions to soil and groundwater contamination problems.

DEEP GREEN of NEW YORK, Inc. our soil processor in New Windsor, NY is our most recent acquisition (March 2010). **DEEP GREEN** thermally destroys petroleum contaminants in soils. Thermal treatment is the only process that converts hydro-carbons to harmless steam and carbon dioxide within seconds. Unlike most soil processors, Deep Green guarantees processed soils have been cleaned as per NYSDEC standards.

Services

Treatment/Storage/Disposal

Cycle Chem, Inc. is permitted to dispose of toxic and hazardous waste, meeting the stringent TSDF Part "B" requirements as fully licensed Treatment, Storage and Disposal Facilities. We adhere to the most demanding environmental codes in the nation. This assures that no matter what material we handle for you, your waste disposal program will be in full compliance with all state and federal regulations.

Turnkey Waste Disposal Programs

Our technical staff supports your team to help design a program that is efficient and cost effective for your company. We assist you with all required paperwork, container labeling compliance, cost cutting through segregation and bulk packing, hazardous waste transport, evaluating final disposal methods, providing certificates of disposal, and computerized detail that supports your biannual hazardous waste reporting.

Transportation Services

We maintain a complete fleet of specialized vehicles to transport toxic and hazardous waste. Our drivers and technicians are fully trained and certified in the handling of all materials that are transported.

Quality Control and Quality Assurance

As a hazardous waste generator, your company has "cradle to grave" responsibility. We also share in this responsibility for all materials we handle. Our computerized tracking system, the issuance of certificates of disposal, our certified laboratory and annual reporting services provide the quality control and quality assurance we both require.

Storage and Re-Packing

Hazardous materials that are collected by us are transported to our conveniently located TSDF's located in Elizabeth, NJ and Lewisberry, PA. They are all fully permitted and staffed by highly trained personnel. When hazardous materials arrive, they are moved immediately into an appropriate process area. Small volumes are combined or blended, as appropriate, with large volumes to achieve a savings which we pass on to you.

Thermal Treatment of Petroleum Hydrocarbons in Soil

DEEP GREEN of NEW YORK, Inc. (DEEP GREEN) is a New York State Solid Waste permitted facility in New Windsor, NY. It is permitted to store approximately 11,000 tons of petroleum contaminated soils and has a throughput of up to 525 tons per day. **DEEP GREEN** uses high temperature rotary kiln treatment to thermally destroy petroleum hydrocarbon contaminants in soils creating an inert recycled material for potential re-use and/or backfill.

Innovative Recycling and Disposal

CCI has carefully selected the final treatment and disposal facilities used. All are in complete compliance with Federal and State regulations. For an added measure of protection CCI performs environmental, financial and insurance audits of all disposal facilities to assure complete compliance. Based on the materials involved, you may have a choice of disposal methods. We will advise you about treatment, recycling, incineration, and energy recovery, as well as any new technologies as soon as they become available. Our continuous efforts to identify new, more cost effective methods save you time and assure you of the best low cost options for disposal.

Cost Effective

By providing complete transport, storage, re-packing and disposal services, we are able to offer you the most cost effective disposal solutions. Unlike our competitors who have to subcontract with third parties, we handle every aspect of your disposal program directly.

Analytical Service

If you are unable to provide a Material Profile Sheet (MPS) for the material involved, we will perform analysis to determine the composition. Based on the analysis in conjunction with your knowledge of the material, an MPS is generated. The treatment and the final disposal or recycling method is then determined. CCI's Elizabeth, NJ location is a fully New York & New Jersey certified laboratory. CCI-09 lab is accredited through the PADEP.

Wide Range of Analysis

- Ground, surface and waste water analyses
- Soils, sludges, sediment analysis
- RCRA characteristic testing
- Waste compatibility testing
- Field sample characterization testing
- TCLP metals testing
- Disposal analysis
- Leachate analysis
- Solvent compatibilities and assaying

Precision Analytical Capabilities

- Total Organic Carbon Analyzing
- Gas Chromatography
- Karl Fischer Titration
- Atomic Absorption Spectrometry
- FTIR ·UV-Vis Spectrophotometry
- Bomb Calorimetry
- Auto Flash Point Testing
- Orion 920A pH Test Metering
- Analytical and Top Loading Weighing



CYCLE CHEM, INC. – ELIZABETH, NJ
FACILITY AUDIT

Date of Audit:

January 2012

Name/title of auditor:

Jim Butler/Regulatory & Compliance Officer

Name of Facility:

Cycle Chem, Inc.

Facility Address:

217 South First Street, Elizabeth, NJ 07206

Facility phone number:

(908) 355-5800

Facility contact/title:

Rick Otto, General Manager

Facility Size:

2.03 acres

Number of employees at this location:

55

Owner:

Witte-Chase Environmental Services

217 South First Street

Elizabeth, NJ 07206

PERMIT INFORMATION

EPA ID Number:

NJD002200046

Does facility have a Part B permit? If yes, when was it granted?

Yes. Part "B" Permit was issued 12/14/88 renewed on 10/15/96 and expired on 10/15/06. CCI is currently in the renewal process with the NJDEP.

Permitted treatment activities at this site:

Storage, transfer, & treatment

Waste types/EPA waste codes acceptable:

All EPA waste codes except U238, K064, K065, K066 & K088 – Radioactives, Explosives or Bio-Hazards

Waste types/EPA waste codes not acceptable:

See above

Total storage allowed:

249,999 gallons

Restrictions on amount of waste accepted or processed:

Limited to 10500-gallons of PCB waste on-site; 5000 gallons in drums and 5500 gallons bulk RCRA non-hazardous.

FACILITY HISTORY

Previous site owner(s) and site use(s): Perk Chemical Company 1962-1984/Dry Cleaning Solvent Reclamation

How long has facility been operating at this site?

As Cycle Chem - since 1984

Did facility ever operate at another site?

No.

CONSTRUCTION

Please describe the following, including the number and capacity of each and secondary containment systems:Drum storage area(s):152,499-gallon capacity in various size containers. (Equivalent to 2773 - 55 gallon drums). Secondary containment consist of sloped concrete pad to accumulate collection system. Entire site is surrounded by a 6" curbing for tertiary containment. No incompatible wastes are stored together.

Waste/product storage tanks: 97,500 gallons. Capacity to be stored in 12 above ground storage tanks. Capacities range from 7,500 gallons to 10,000 gallons. No incompatible waste is stored within the same secondary containment system. There are three separate secondary containment systems.

Waste treatment units: Two soil bunkers for bulking/solidification and/or treatment of metal bearing wastes

EMERGENCY EQUIPMENT

What types of fire fighting equipment is available on site?: An extensive fire protection system is installed, along with various sizes of fire extinguishers. Fire protection system is a dry system with foam upon demand to sprinklers, foam cannons and in tank suppression system. The 24-hour fire surveillance system is connected to the local Fire Department.

What types spill response equipment is available on site?

Absorbent, vermiculite, booms, shovels, rakes, and brooms. Vacuum trucks and tankers are available off-site.

Are there groundwater monitoring wells on site? If yes, how many, how often are they tested and what tests are run?

Yes. Three monitoring wells on site were installed. An additional four were installed at the NJDEP's request in 1998. With the removal of underground storage tanks in 1989, there are no regulatory requirements to test these wells.

WASTE ANALYSIS PLAN

Are all incoming waste streams sampled? Are all individual drums sampled? Is compositing done? (if so, how many drums per composite?)

100% Drum Sampling. Compositing may be up to 10 drums of any one waste type. Different generators are not combined in a composite sample.

What tests are run on incoming samples?

Various tests to ensure compliance with all disposal facility criteria and facility permit. Tests to be run are listed in CCI's Waste Analysis Plan.

Is sampling and testing run before or after unloading waste?: After for drums, before for bulks.

How long are samples and waste analysis results retained: There is no sample retention but waste analysis results are held for 5 years.

What certifications does facility lab hold?

New Jersey State certified laboratory.

WASTE DISPOSAL PROCEDURES

How are empty drums disposed:

Empty drums are recycled to the best extent possible.

Describe internal waste tracking system:

Please contact our Customer Service Department for a copy of our "Cycle Chem Drum Waste Tracking System".

Are all outgoing waste shipments sampled? What parameters are tested?

Yes. 100% of bulk shipments are sampled. They are tested depending on the requirements of the final disposal facility, similar to incoming analysis. The drums are not generally re-sampled for outgoing shipments.

What types of wastes are shipped off-site for disposal and to what facilities are they sent? How often are these facilities audited?

Please contact our Customer Service Department for a copy of our Final Treatment Facilities List. All final disposal facilities are audited annually.

TRAINING

What types of training is provided to employees? How often is it given, and by whom? 40 Hour OSHA, OSHA 8 Hour Refresher & Annual. Monthly safety meetings, on-the-job training as required by CCI's permit. Spill simulation/fire drill are routinely conducted. Also USDOT training and other required OSHA training are performed in-house as required.

COMPLIANCE/ENVIRONMENTAL ISSUES

How often is this facility inspected by the EPA and/or the state regulatory agency?

NJDEPE/Bi-Weekly, EPA/Annually RCRA inspection.

How often are internal compliance inspections performed, and by whom?

Daily inspections are conducted by Regulatory Compliance Officer in accordance with various permit requirements.

Please describe any current or completed remediation projects at this site. What was the source of this contamination?

None.

ENVIRONMENTAL RISKS

Population of local municipality:

24893 within 1 mile and 180,000 within 3 miles

Distance from nearest residential area:
facility.

500-1000 feet of

What bodies of water are within 1/2 mile of facility?:

Elizabeth River and Arthur Kill

Distance to drinking water supply? Greater than 2 miles

Briefly describe post closure plans, including financial assurance for closure: Because no disposal is done on site, no post closure plan is required. However a financial assurance mechanism is in place for closure.

SUMMARY OF FACILITY AUDIT

Drum condition

Properly labeled?

Yes

Closed except if being sampled or processed?

Yes

Security stacked?

Yes, up to three drums high

Drums structurally sound?

Yes

Adequate separation between incompatibles?

Yes

Outside of drums free of waste?

Yes

Visible signs of leakage?

None

Storage area diked?

Yes

Drum storage pad treated with chemical resistant coating and free of visible cracks?

Yes

Comments: Waste storage pad is a minimum of six inches thick of impermeable concrete with a permeability rating of no greater than 10^{-6} centimeters per second. The storage tanks secondary containment consists of three separate containment systems to separate incompatible waste.

WASTE STORAGE/WASTE PROCESSING AREAS

Areas free of spills?

Yes

Areas free of strong odors?

Yes

Areas free of trash and debris?

Yes

Secondary containment for all tanks?

Yes

All tanks accessible for visual inspection?

Yes

Emergency equipment adequate, accessible and clearly marked?

Yes

Employees wearing appropriate personal protective equipment?

Yes



**TREATMENT, STORAGE, AND DISPOSAL FACILITY
FACILITY AUDIT**

Date of Audit: January 2012
Name/Title of Auditor: Gary Hoadley, General Manager

I. FACILITY INFORMATION

- A. Name of Facility: Cycle Chem, Inc.
- B. Facility Address: 550 Industrial Drive
Lewisberry, PA 17339
- C. Facility Telephone #: 717-938-4700
- D. Facility Contact: Gary Hoadley
General Manager
- E. Facility Size: Acres occupied: 6
Number of employees at this location: 40
- F. Owner: Witte – Chase Environmental Resources
201 South First Street
Elizabeth, NJ 07206

II. PERMIT INFORMATION

- A. EPA ID Number: PAD067098822
- B. Does the facility have a Part "B" permit? If yes, when was it granted?
If no, has it been applied for and when? Yes, 9/26/08
- C. Please list other permit type (s) and number (s):
Residual Waste Processing permit, No. 301280; Air permit, No. 67-399-016; NPDES permit No. 0084107

- D. Permitted treatment activities at this site:
Storage, Transfer, and Treatment (see enclosed treatment list)
- E. Waste types/EPA waste codes acceptable:
See attached list
- F. Waste types/EPA waste codes not acceptable:
See attached list
- G. Total storage allowed:
Hazardous Waste – 194,500 gallons
Residual Waste - 1007cy³
- H. Restrictions on amount of waste accepted or processed:
See attached list

III. FACILITY HISTORY

- A. Previous site owner (s) and site use (s):
Industrial Waste Removal,
Part A permitted storage facility
Remtech Environmental Group, Part B Permitted TSD
- B. How long has the facility been operating at this site?
Since 11/13/78
- C. Did the facility ever operate at another site?
No

IV. FACILITY CONSTRUCTION

Please describe the following, including the number and capacity of each and secondary containment systems:

- A. Drum storage area (s): 285,890 gallon capacity in various size containers.
All storage areas have secondary containment, consisting of sloped concrete pad and collection system. Tertiary containment provided by 6"-18" concrete curb.
- B. Waste/product storage tanks: 120, 953 gallon capacity with secondary and tertiary containment systems.
- C. Waste treatment units: 3 bunkers used for neutralization and stabilization. Bunkers are HDPE lined with leak detection

- D. Emergency equipment:
Tanks containing flammable liquids have a nitrogen blanketing system. Spill response equipment is located throughout the facility.
- (1) What type (s) of fire fighting equipment is available on site?
Hazardous Waste facility is protected with foam fire suppression system. Portable fire extinguishers are located at multiple points within the facility. 24 hour alarm system.
Residual Waste Building is equipped with Water Sprinkler System
- (2) What type (s) of spill response equipment is available at the site?
Absorbents, booms, shovels, various drums and over packs, vacuum equipment, etc.
- E. Are there groundwater monitoring wells on site? If yes, how many, how often are they tested and what tests are run? Yes. Tested every 3rd quarter for volatile and semi volatile organics, pesticides and herbicides, metals and various wet chemistry parameters.
- F. Are there any plans for expansion? If so, please describe: No

V. WASTE ANALYSIS PLAN

- A. Are all incoming waste streams sampled? Are all individual drums sampled? Is compositing done? (If so, how many drums per composite)?
100% drum sampling. Compositing may be up to 10 drums of any waste stream. Different generators are not combined in a composite sample.
- B. What tests are run on incoming samples?
Various tests to ensure compliance with all disposal facility criteria, as well as, Federal and State criteria. The various tests are listed in the Waste Analysis Plan.
- C. Is sampling and testing run before or after unloading waste?
After unloading for drummed wastes; before unloading for bulk wastes.
- D. How long are samples and waste analysis results retained?
Waste Analysis results are retained indefinitely.
- E. What certifications does the facility lab hold? Does the laboratory do outside laboratory analyses or is it only for in-house waste analysis.
Laboratory is PA DEP Accredited, # 67-03200 , primarily in-house waste analysis only.

VI. WASTE DISPOSAL PROCEDURES

- A. Describe waste handling procedures from the arrival of waste at the facility to the ultimate disposal of waste.
Containerized waste is received, sampled, analyzed, approved, consolidated and shipped to the final disposal facility per Cycle Chem's waste tracking system and Waste Analysis Plan.
- B. How are empty drums disposed?
Empty drums are recycled or crushed and disposed of according to waste contained.
- C. Describe internal waste tracking system:
See "Cycle Chem Drum Waste Tracking System"
- D. Are all outgoing waste shipments sampled? What parameters are tested?
Yes, 100% of bulked waste. Drums previously tested. The tested parameters are based on the outbound facility requirements.
- E. What types of wastes are shipped off-site for disposal and to what facilities are they sent. How often are these facilities audited?
All wastes received are shipped to a variety of locations. Disposal outlets are audited prior to initial use and audited periodically thereafter.

VII. TRAINING

- A. What type of training is provided to employees? How often is it given and by whom?
40 hour HAZWOPER, 8 hour Refresher, Confined Space, Forklift, Hazard Communication, DOT and any additional required regulatory training. All training is provided by qualified facility personnel or qualified outside trainers.

VIII. COMPLIANCE

- A. How often is this facility inspected by the EPA and/or state regulatory agencies?
PADEP formally inspects this facility four times a year.
USEPA has no routine schedule of inspections.

C. How often are internal compliance inspections performed and by whom?

Daily and Weekly inspections are conducted by the Compliance and Approvals Department in accordance with various permit requirements.

D. Please describe any current or completed remediation projects at this site. What was the source of this contamination?

None

E. ENVIRONMENTAL RISKS:

(1) Population of local municipality: Approximately 15,000

(2) Distance from nearest residential area: 0.25 miles

(3) What bodies of water are within .5 mile of the facility?

An unnamed stream which flows to an unnamed tributary of the Susquehanna River.

(4) Distance to drinking water supply? 0.25 miles

(5) Briefly describe post closure plans, including financial assurance for closure. Because no disposal is performed on site, no post closure plan is required. Letter of Credit on file for Closure requirements.

Characteristic Hazardous Wastes

D001	D002	D003	D004	D005	D006	D007
	D008	D009	D010	D011	D012	
D013	D014	D015	D016	D017	D018	D019
	D020	D021	D022	D023	D024	
D025	D026	D027	D028	D029	D030	D031
	D032	D033	D034	D035	D036	
D037	D038	D039	D040	D041	D042	D043

Hazardous Wastes From Non-Specific Sources

F001	F002	F003	F004	F005	F006	F007
	F008	F009	F010	F011	F012	
F019	F020	F021	F022	F023	F024	F025
	F026	F027	F028	F032	F034	
F035	F037	F038	F039			

Hazardous Wastes From Specific Sources

K001	K002	K003	K004	K005	K006	K007
	K008	K009	K010	K011	K013	
K014	K015	K016	K017	K018	K019	K020
	K021	K022	K023	K024	K025	
K026	K027	K028	K029	K030	K031	K032
	K033	K034	K035	K036	K037	
K038	K039	K040	K041	K042	K043	K044
	K045	K046	K047	K048	K049	
K050	K051	K052	K060	K061	K062	K069
	K071	K073	K083	K084	K085	
K086	K087	K088	K093	K094	K095	K096
	K097	K098	K099	K100	K101	
K102	K103	K104	K105	K106	K107	K108
	K109	K110	K111	K112	K113	
K114	K115	K116	K117	K118	K123	K124
	K125	K126	K131	K132	K136	
K141	K142	K143	K144	K145	K147	K148
	K149	K150	K151	K156	K157	
K158	K159	K161	K169	K170	K171	K172
	K174	K175	K176	K177	K178	
K181						

Acute Hazardous Wastes

P001	P002	P003	P004	P005	P006	P007
	P008	P009	P010	P011	P012	
P013	P014	P015	P016	P017	P018	P020
	P021	P022	P023	P024	P026	
P027	P028	P029	P030	P031	P033	P034
	P036	P037	P038	P039	P040	
P041	P042	P043	P044	P045	P046	P047
	P048	P049	P050	P051	P054	

P056	P057	P058	P059	P060	P062	P063
	P064	P065	P066	P067	P068	
P069	P070	P071	P072	P073	P074	P075
	P076	P077	P078	P081	P082	
P084	P085	P087	P088	P089	P092	P093
	P094	P095	P096	P097	P098	
P099	P101	P102	P103	P104	P105	P106
	P108	P109	P110	P111	P112	
P113	P114	P115	P116	P118	P119	P120
	P121	P122	P123	P127	P128	
P185	P188	P189	P190	P191	P192	P194
	P196	P197	P198	P199	P201	
P202	P203	P204	P205			

Toxic Hazardous Wastes

U001	U002	U003	U004	U005	U006	U007
	U008	U009	U010	U011	U012	
U014	U015	U016	U017	U018	U019	U020
	U021	U022	U023	U024	U025	
U026	U027	U028	U029	U030	U031	U032
	U033	U034	U035	U036	U037	
U038	U039	U041	U042	U043	U044	U045
	U046	U047	U048	U049	U050	
U051	U052	U053	U055	U056	U057	U058
	U059	U060	U061	U062	U063	
U064	U066	U067	U068	U069	U070	U071
	U072	U073	U074	U075	U076	
U077	U078	U079	U080	U081	U082	U083
	U084	U085	U086	U087	U088	
U089	U090	U091	U092	U093	U094	U095
	U096	U097	U098	U099	U101	
U102	U103	U105	U106	U107	U108	U109
	U110	U111	U112	U113	U114	
U115	U116	U117	U118	U119	U120	U121
	U122	U123	U124	U125	U126	
U127	U128	U129	U130	U131	U132	U133
	U134	U135	U136	U137	U138	
U140	U141	U142	U143	U144	U145	U146
	U147	U148	U149	U150	U151	
U152	U153	U154	U155	U156	U157	U158
	U159	U160	U161	U162	U163	
U164	U165	U166	U167	U168	U169	U170
	U171	U172	U173	U174	U176	
U177	U178	U179	U180	U181	U182	U183
	U184	U185	U186	U187	U188	
U189	U190	U191	U192	U193	U194	U196
	U197	U200	U201	U202	U203	
U204	U205	U206	U207	U208	U209	U210
	U211	U213	U214	U215	U216	
U217	U218	U219	U220	U221	U222	U223
	U225	U226	U227	U228	U234	
U235	U236	U237	U238	U239	U240	U243
	U244	U246	U247	U248	U249	
U271	U278	U279	U280	U328	U353	U359
	U364	U367	U372	U373	U387	
U389	U394	U395	U404	U409	U410	U411

Safety & Health Program Summary

Cycle Chem, Inc. and General Chemical Corporation are committed to providing a safe workplace for their employees, serving their clients with utmost safety, and striving for a cleaner and safer environment. Consequently, all field and supervisory employees, including sales and administrative personnel, undergo comprehensive and continual health and safety training. For example, in accordance with 29 CFR 1910.120(e) - the training requirements of the OSHA

“HAZWOPER” standard, various employees of CVI and affiliated companies receive the following training:

- 40 Hour Initial HAZWOPER for general site workers
- 24 Hour Initial HAZWOPER for occasional site workers
- 8 Hour HAZWOPER Supervisor for site supervisors
- 8 Hour Annual HAZWOPER Refresher for all trained workers

Beyond 29 CFR 1910.120 (e), these employees also undergo other OSHA, U.S.DOT and NJ DEP required safety training relevant to our operations, including:

- Confined Space Entry
- Fire Safety
- Respiratory Protection
- Hazard Communication
- Lock-out/Tag-out
- Occupational exposure to blood-borne pathogens
- Occupational exposure to hazardous laboratory chemicals
- Competent persons in excavation
- Hazardous materials transportation HM-126F, HM-181, HM-215

Additionally, CCI & GCC have developed and implement a written Safety and Health Program, which includes among other requirements, safety and health Standard Operating Procedures {mandated by 29 CFR 1910.120(b)(ii)} enunciating corporate policies in the following areas of OSHA, EPA, U.S. DOT, and NJDEP occupational and environmental safety and health requirements pertinent to our operations:

OSHA General Industry Standards – 29 CFR 1910

- Walking-Working Surfaces: Fixed industrial stairs, Portable and Fixed ladders, Scaffolding – Subparts .24 to .30 CVI SOP # 980225
- Emergency Response Plans: Fire Prevention – Subpart .30 CVI SOP #980225

- Vehicle-mounted Work Platforms, Man-Lifts: - Subparts .67 to .68 CVI SOP# 980225
- Occupational Health & Environmental Controls: Occupational noise exposure and Ionizing radiation – Subparts .96 to .97 CVI SOP # 980225
- Hazardous Materials: Flammable and combustible liquids – Subpart .107 CVI SOP #851010
- Personal Protective Equipment: Eye and face protection, Respiratory protection, Head protection, Foot protection, Hand protection – Subparts .132 to .138 CVI SOP # 950429
- General Environmental Controls: Sanitation - Subpart .141, Permit required confined spaces – Subpart .146 and Control of hazardous energy Subpart .147 CVI SOP #'s 950201, 941213
- Fire Protection – Subparts .155 to .165 CVI SOP #950604
- Portable Tools and Equipment – Subpart .244 CVI SOP # 980226
- Electrical Work: Training - Subpart .322, Use of Equipment – Subpart .333 Safeguards for Personal Protection - Subpart .334
- Toxic and Hazardous Substances: – Air contaminants – Subpart .1000, Asbestos – Subpart .1001, Blood-borne pathogens – Subpart .1030, Hazard communication - Subpart .1200, Retention of DOT markings, placards and labels – Subpart .1201, Occupational exposure of hazardous chemicals in laboratories – Subpart .1450 CVI SOP #s950216, 950415, 950513, 950505PP, 950614 & 950615

OSHA Construction Standards – 29 CFR 1926

- Cranes, Derricks & Hoists: – Subpart N CVI SOP # 950101-C
- Fall Protection: Subparts .502, .503 CVI SOP #941214
- Excavation: Subpart P CVI SOP # 960501
- Motor Vehicles, Mechanized Equipment: Subparts .600 to .602 CVI SOP #950120
- Marine operations and equipment: Subpart .605 CVI SOP #95058
- Surface transportation of explosives: Subpart .902 CVI SOP #980225
- RCRA: 40 CFR 264, 265 (EPA)
- Transportation of hazardous materials: 40 CFR HM 171, 172.704 (US DOT)
- Drug and alcohol testing – 49 CFR 199 (US DOT)
- Closure of Underground storage tanks: NJ DEP

Finally, to assure company implementation of our strict employee compliance with these SOP's, the Corporate Safety and Health Officer conducts daily, random and unannounced job site audits. In addition, all CCI and GCC applicable employees participate in our Comprehensive Medical Surveillance Program.



State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection
Division of Solid & Hazardous Waste
P.O. Box 421
Trenton, New Jersey 08625-0421
Phone# 609-292-9880
Fax# 609-633-9839

Robert C. Shinn, Jr.
Commissioner

Hazardous Waste Facility Permit

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

Cycle Chem Inc.
217 South First Street
Elizabeth NJ 07206

For the Purpose of Operating a: Hazardous Waste Storage, Treatment,
and Transfer Facility
On Block No.: 2
Lot Nos.: 865, part of 74
In the Municipality of: Elizabeth
County: Union
Under Facility Permit No.: 2004E2HP07
EPA ID No.: NJD 002 200 046

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


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

October 15, 1996
Issuance Date

December 3, 1997
Reissuance Date

January 3, 1998
Effective Date

November 15, 2006
Expiration Date



John A. Castner, P.E., P.P.
Acting Assistant Director
Division of Solid & Hazardous Waste



State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JON S. CORZINE
Governor

LISA P. JACKSON
Commissioner

Solid and Hazardous Waste Management Program
401 East State Street, P.O. Box 414
Trenton, New Jersey 08625-0414
Phone# (609) 292-9880
Fax# (609) 633-9839
<http://www.state.nj.us/dep/dshw>

NOV 15 2006

Michael Persico, President
Cycle Chem. Inc.
217 South First Street
Elizabeth, NJ 07206

RE: Permit Status, Cycle Chem. Inc., Elizabeth, Union County, EPA ID No. NJD 002 200 046.

Dear Mr. Persico:

The Bureau of Solid and Hazardous Waste Permitting - North (Bureau) acknowledges the receipt of your email dated October 30, 2006 requesting a written confirmation from the Bureau that the facility's current solid and hazardous waste facility (SHWF) permit will remain effective beyond its expiration date of November 15, 2006, until a renewal permit has been issued by the Bureau.

Be advised that, although SHWF permits have an expiration date, a permit remains active until an administrative action to terminate the permit is taken by the Department. Cycle Chem, Inc. submitted a permit renewal application in accordance with 40 CFR 270.10(h), which is currently under review by the Bureau. Therefore, the current permit shall remain in effect until a final decision is made regarding the permit renewal application. During this time, Cycle Chem. Inc.'s current SHWF permit shall remain effective and enforceable and Cycle Chem. Inc. must continue to comply with all provisions of the SHWF Permit No. 2004E2HP09 and any modifications (if applicable).

Should you have any questions regarding this matter, please call Abiola Badru at (609) 777-1381, or e-mail him at Abiola.Badru@dep.state.nj.us.

Very truly yours,

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

- c. Barry Tornick, USEPA, Region II
- Jeff Sterling, BHWCE, Northern Region



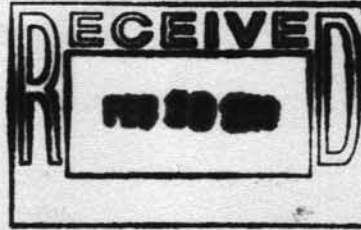
Pennsylvania Department of Environmental Protection

909 Elmerton Avenue
Harrisburg, PA 17110-8200

February 27, 2003

Southcentral Regional Office

Mr. Terry Wittenberg
Regulatory Compliance Officer
Cycle Chem, Inc.
550 Industrial Drive
Lewisberry, PA 17339



717-705-4706
FAX - 717-705-4930

Re: Administrative Completeness Review
RCRA Part B Permit Application Renewal
Hazardous Waste Treatment & Storage Facility
ID No. PAD067098822
Fairview Township, York County

Dear Mr. Wittenberg:

This is to inform you that the Department has reviewed the above-referenced application for permit modification in order to determine whether it contains the information, maps, fees, and other documents necessary to be deemed administratively complete. Please be advised that your application is determined to be administratively complete. As per your letter dated February 13, 2003, it is the Department's understanding that the topographic map and the Form B (Professional Certification) will be submitted during March 2003. The Department is requesting that the map and Form B be submitted to our office no later than March 21, 2003.

Please be advised that the current hazardous waste permit, which was issued to your facility on February 16, 1993, was initially scheduled to expire on February 15, 2003. Section H, Paragraph 3 of the current permit states that "This permit and all conditions therein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application..." Because Cycle Chem, Inc. has submitted a complete application for a new permit before the expiration date of the current permit, the current permit will remain in effect until the Department decides to issue a new permit or deny the new permit application.

During the technical review, Mr. Tom Hanlon will be the lead reviewer for your application. The lead reviewer will evaluate the adequacy of the applications and its components to determine if sufficient information exists to render a decision on the technical merits of your application. Ms. Linda Houseal, Facilities Supervisor, will coordinate comments from other technical staff as may be necessary for a comprehensive evaluation of the application.

