

August 16, 2013

Planning and Zoning  
City of Commerce City  
7887 East 60<sup>th</sup> Avenue  
Commerce City, CO 80022

Ref: Veolia ES Technical Solutions Conditional Use Permit Statement of operations  
9131 E. 96<sup>th</sup> Avenue, Henderson, CO 80640

To Whom It May Concern:

This letter serves as the updated statement of operations regarding the conditional use permit for the property located at 9131 E. 96<sup>th</sup> Avenue, Henderson, Colorado. This property is the location for the Veolia Environmental Services Technical Solutions, LLC's Henderson Facility.

If you have additional questions or need additional information please do not hesitate to contact me at the phone number and address listed at the top of the page.

Sincerely,

  
Thomas M. Anckner

General Manager

Mountain Branch

T 303-289-4827 C 303-884-4538

Encl: Supporting Documentation Pages 2-36

## **BUSINESS OVERVIEW**

Veolia Environmental Services Technical Solutions (VES-TS) provides a complete range of services for industrial and municipal customers needing to dispose of hazardous and non-hazardous waste. VES-TS offers comprehensive hazardous waste services that are built upon a support structure of transportation, processing facilities and customer service field offices located throughout the United States, Puerto Rico and Canada. VES-TS owns and operates an integrated, nationwide network of facilities providing thermal destruction, fuels blending, solvent recovery and technical services. VES-TS also utilizes VES-TS audited and approved subcontract facilities for these services. The following is a listing of services that are provided to VES-TS customers throughout the world. The VES-TS Henderson location provides these services to its customers, however, not all of the services result in wastes being received and managed at the facility. Many of the services involve work being performed at the customers site, providing consulting services and direct waste shipments to other disposal facilities located within and outside of Colorado. The types of wastes and methods of treatment that are managed at the Henderson facility are further explained later in this document.

## FACILITY IDENTIFICATION

**Facility Name** Veolia ES Technical Solutions, L.L.C  
Henderson Facility

**Address** 9131 E. 96th Avenue  
Henderson CO 80640

**Facility EPA #** COD980591184

**Transportation EPA #** NJD080631369

**Phone #** (303) 289-4827

**FAX #** (303) 289-3520

**Business Hours** Monday – Sunday  
8:00am – 5:00pm MST

## FACILITY MANAGEMENT

**General Manager** Tom Anckner

**Financial** Ron Bohl

**Operations** Tewodros Tesfaye

**Environmental Health & Safety** Sean Hixenbaugh

**Laboratory** Charles Candelaria

**Transportation** Jesse Shoemaker

**Field Services** Jody Lyday

## CORPORATE ORGANIZATION

**Corporate Address** Veolia ES Technical Solutions, L.L.C.  
720 E. Butterfield Road  
Lombard, Illinois 60148

**Corporate Phone** (630) 218-1763

**President** Jim Bell

**Vice President, Chief Financial Officer** Doug Berg

**Vice President, Legal and Compliance** Greig Siedor

**Vice President, Sales and Marketing** Rob Wlezien

**Vice President, Service Operations East** Paul McShane

**Vice President, Service Operations West** Bob Cappadona

**Vice President, Technology Development** George Martin

**Vice President, Human Resources** Michael Loeffel

**Director of Environment and Transportation** Tom Baker

**Director of Safety and Health** Mike Richter

**Senior Manager of Environmental Affairs** Kevin McGrath

**Transportation Compliance Manager** Jennifer Eberle

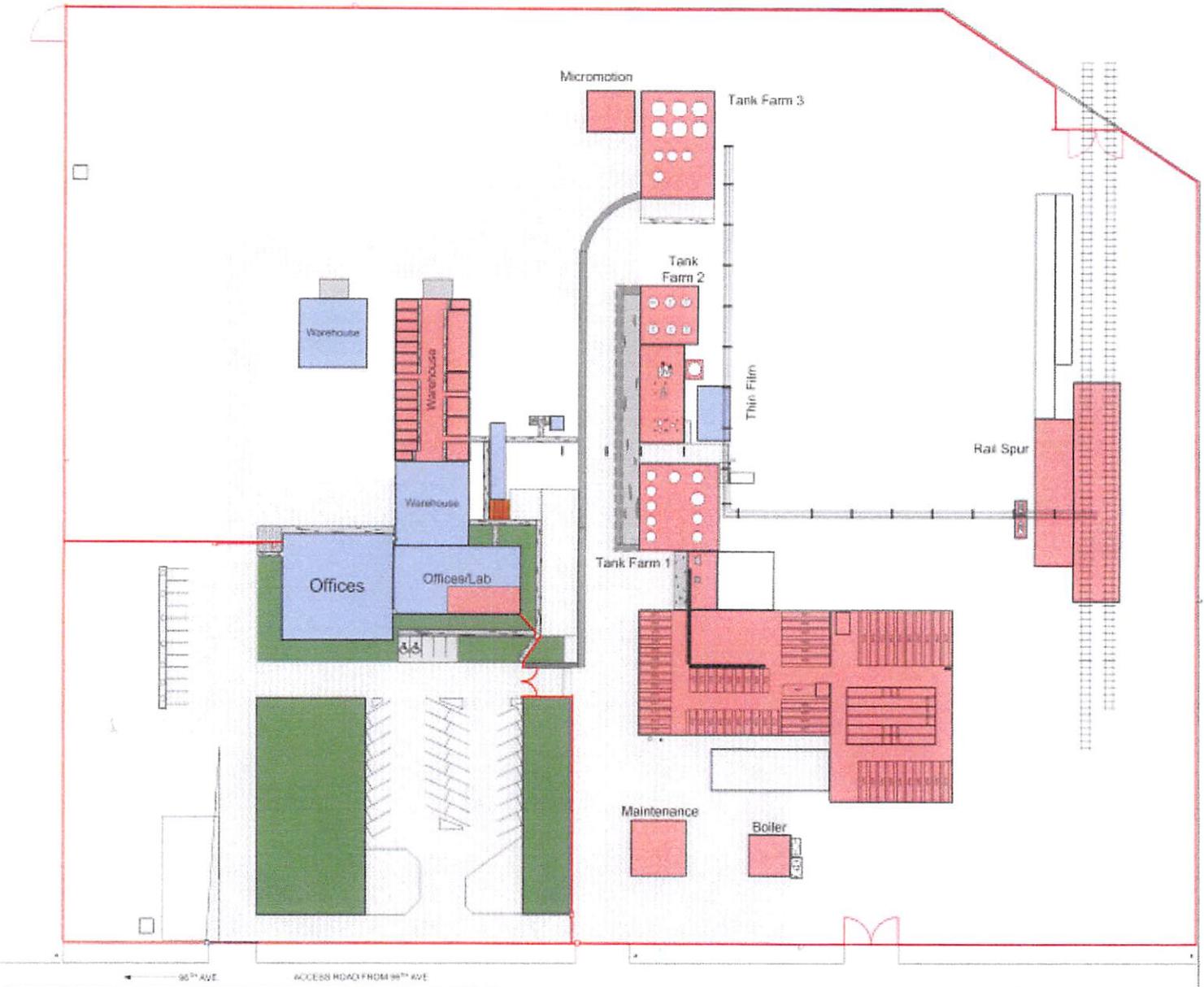
## Facility History

The Henderson facility is approximately 20 acres in size, and is located in an industrial area of Adams County and Commerce City, Colorado. The site is 20 miles northeast of downtown Denver. Prior to 1980, the land was primarily rural agricultural farmland. Oil and Solvent Process Company (OSCO) initially built the facility in 1980, with new buildings and waste management units added since that time. Chemical Waste Management (CWM), a subsidiary of Waste Management Inc., purchased the facility in 1986. Veolia Environment subsequently bought the facility in June 1999 under the Onyx Environmental Services brand name. Onyx Environmental Services changed its name to Veolia ES Technical Solutions in 2006.

## Land Use

The Henderson facility's neighboring properties are a petroleum product storage and transfer facility located to the southwest, railroad property to the west, agricultural land on the south, and commercial shipping companies to the east and north of the facility. The Rocky Mountain Arsenal is located one mile to the southeast.





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T - 303-289-4827  
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Henderson, Colorado  
www.VeoliaES.com

## HENDERSON OVERVIEW

The Henderson facility hazardous waste operations are regulated, in part, by the Colorado Department of Health and Environment. (CDPHE.) Certain activities performed at the facility are also regulated by the U.S. Environmental Protection Agency,(USEPA) Department of Transportation,(DOT) and South Adams County.

- The facility operates twenty four hours a day, seven days a week, year round.
- There is an average of 50 employees on site during normal business hours Monday through Friday, with a smaller number of employees on site during nights and weekends, usually 7 or less.
- The required number of parking spaces is 63 and 59 are provided by the facility. Future expansion of the office facilities will require providing the 4 deficient parking stalls in addition to those required by the expansion.
- The facility generates approximately 5-10 hazardous waste outbound truck shipments per day.
- The facility has approximately 5-10 hazardous waste inbound truck shipments per day.
- The facility has approximately 10-20 hazardous material inbound truck shipments per day.

The Henderson facility is classified by the U.S. Environmental Protection Agency (USEPA) and Colorado Department of Health and Environment (CDPHE) as a Treatment, Storage, Disposal, Facility (TSDF) in their respective regulations, however, **no disposal occurs at this facility.**

The Resource Conservation and Recovery Act (RCRA) Part B Permit issued by CDPHE to VES-TS specifies the administrative and operational requirements for managing hazardous and non-hazardous wastes at the facility. Wastes may be stored at the facility for up to one year from the date of receipt with some limited exceptions.

The Henderson receives wastes in non-bulk containers (<110 Gallons). The container contents may be solid, semi-solid, liquids, lab packed (small containers packaged in outer containers) or gases. The facility also receives bulk (>110 Tote and Tanker) containers of solid, semi-solid, and liquids. Below is a high level overview of the major steps in managing hazardous and non-hazardous wastes at VES-TS Henderson. Additional details about the facility are included in later sections.

VES-TS Henderson provides Colorado industry and communities with properly trained personnel and state-of-the-art facilities to classify, package, segregate, treat, transport, and dispose of hazardous and non-hazardous wastes in accordance with federal, state and local laws and regulations.

The facility has been constructed in compliance with all Federal and State hazardous waste regulations for tanks and their containment systems, container storage, and treatment systems (distillation, liquid-liquid extraction). The facility has a cryogenic vapor recovery system to recover a minimum of 95% of all emissions from all permitted hazardous waste tanks, distillation and liquid-liquid extraction systems.

Waste Information Profile (WIP) Characterization - Prior to receiving hazardous and non hazardous wastes the customer/generator must complete a Waste Information Profile (WIP) that describes the detailed chemical and physical properties of the waste. The WIP includes the type of packaging, DOT shipping information and waste codes applicable to the waste. Samples, analysis, or Material Safety Data Sheet (MSDS) literature may be requested in order to provide the necessary information.

Review And Approval - Professionally trained and educated personnel review the WIP for accuracy and assess the information to determine if the waste is acceptable under the conditions of the permit. The personnel will use the WIP, analysis, MSDS and other technical literature to complete the review and approval of the waste for acceptance at the facility. The assessment also includes a determination of the methods of storage and/or treatment the facility will use to manage the waste.

Inbound Transportation And Packaging – The facility may provide pickup and transportation services of the waste for the customer/generator. The facility has a staff of licensed DOT hazardous material trained drivers and a fleet of tractor-trailers (tanker and dry van) and straight axle trucks for transporting the wastes. The drivers will inspect each container for integrity and compliance with DOT prior to loading. Containers in poor condition will be re-packaged. The driver will ensure the manifest or shipping paper is properly filled and the load is meets the loading and segregation requirements of DOT prior to transporting.

Receiving And Waste Analysis – Upon arrival at the facility, all of the containers will be unloaded and inspected by hazardous waste trained operations personnel. Bulk Liquids and containers that are approved for storage in tanks and other treatment methods will be sampled and submitted to the onsite laboratory for analysis as specified in the Waste Analysis Plan (WAP) of the permit. Containerized and bulk wastes are placed on hold until the laboratory completes the analysis and clears the waste for further processing.

Analysis – The facility has an on-site lab capable of performing analysis that ensures the waste is conforming to the WIP. The lab performs a variety of test methods using state of the art equipment including Gas Chromatography (GC) for organic detection, Penske –Marten Flashpoint, Ph, BTU Calorimetry, Karl Fisher Titration for water content, strip paper for peroxide formation and oxidizing characteristics. The laboratory also uses practical bench testing methods to determine compatibility of mixtures, temperature increases, ignitability, water reactivity using visual observation. The laboratory will compare the testing results with the information provided on the WIP and make a determination of conformity. If the waste is non-conforming the customer/generator will be contacted to resolve the discrepancy. If the waste is conforming the waste will be cleared for further processing.

Storage And Segregation – Containerized wastes will be placed into storage pending analysis results (within 10 days) and further processing Bulk liquid wastes are not placed into tank storage until the analysis is completed (same day). Containerized wastes are stored in the permitted areas of the facility and segregated by hazardous class and chemical compatibility. These containers may be re-packaged in new containers to meet disposal requirements. The containerized storage areas and tank farms are constructed with dike walls and coated with an impervious epoxy coating. This construction enables segregation of incompatible waste types (e.g. Corrosive acids separated from Corrosive Bases) and ensures materials are contained in the event of a leaking container or tank. Storage areas are inspected daily.

Treatment In Containers - The facility is authorized to perform the specific treatment methods listed below on containerized wastes.

Neutralization - The Permittee may perform neutralization of corrosive hazardous waste (acids and bases) in containers with capacities of 110 gallons or less. The treatment may occur in a specific, designated area within any of the container storage areas, except Container Storage Area No. 7 the Rail Storage/Transfer Area.

Aerosol Can Treatment - Aerosol can treatment will eliminate the reactive and/or flammable hazards associated with the aerosol cans. The aerosol can treatment unit is a commercial piece of equipment that punctures the aerosol can and collects the liquid in a drum. Gases, if present are routed through a carbon canister for proper emission control. Aerosol can treatment will occur within a specific, designated area within any of the Container Storage Areas.

Solidification - The Permittee may perform solidification of hazardous waste in containers. The treatment will occur by adding absorbent materials to containers for the sole purpose of removing free liquids.

Container to Container Blending - The Permittee may perform blending of hazardous waste from containers to containers. The treatment will occur in a specific, designated area within any of the container storage areas.

Treatment In Tanks - The facility is authorized to perform the specific treatment methods listed below on wastes in tanks.

Treatment Unit #1 - Thin Film and Fractional Distillation Column - In this unit, waste solvents will be reclaimed by heating liquid wastes to a gaseous phase, followed by condensation and accumulation of clean solvent. This unit may also be utilized for the recovery of metals and other fractions from the solids left after distillation. Equipment associated with this unit includes a thin film processor, fractional distillation column, condenser, accumulation tanks, refrigerated emission control and associated pumps and piping.

Treatment Within Tanks in Tank Farms #1 , #2 and #3 - The Permittee is permitted to treat corrosive hazardous waste (acids and bases) in Tank 31 by neutralization. The neutralization process will convert hazardous, corrosive wastes to non-hazardous or less hazardous waste and salts.

Phase Separation - The Permittee is permitted to treat hazardous waste by phase separation as a stand alone waste treatment process or as a pretreatment process. The phase separation process uses gravimetric settling of higher density materials to produce separation. Phase separation will occur in the tanks in Tank Farm #1 , Tank Farm #2 and Tank Farm #3.

Filtration - The Permittee is permitted to treat hazardous waste by filtration as a treatment process. Filtration will reduce the amount of unwanted solids such as particulates, foreign objects, and sludges in the waste.

Solvent Extraction - The Permittee is permitted to treat hazardous waste by liquid/liquid and solid/liquid extraction as a treatment process. The liquid/liquid and solid/liquid extraction process utilizes the introduction of an insoluble phase, typically water, into the waste, agitating the mixture, then the agitated solution proceeds to the phase separation process. The agitation, i.e. liquid/liquid extraction process, will occur in Tanks #6, #9, and #10 and the extraction column.

Aqueous and Fuels Blending - The Permittee is permitted to treat hazardous waste by blending. Containerized and bulk aqueous wastes, solvents, still bottoms, solids, sludges, paint pigments and other wastes will be transferred to a tank. The tank contents will be blended and the composition adjusted to meet specifications designated by the specific disposal facility.

Bulking of Solids - Henderson will consolidate solids into roll off containers for subsequent shipment to offsite TSDF's. Containers are dumped manually into roll offs using forklifts outfitted with attachments designed to properly overturn a container without spillage.

Equipment Decontamination – Henderson accepts equipment for customers that has been purged and emptied of all hazardous material. The facility tests the equipment electrically and performs a second decontamination as a precaution to protect the customer's employees from exposure.

Outbound Transportation And Packaging – Approximately 50% of all wastes received by the facility are stored for the purpose of accumulating full truck or rail volumes for shipment to off-site TSDf's. Shipments are destined to various permitted Treatment, Storage, and Disposal Facilities located both in and out of state. These facilities specialize in various treatment and disposal technologies including, but, not limited to Incineration, Energy Recovery, Metal Reclamation, Solvent Reclamation, Waste Water Treatment, Battery reclamation, Electronic Reclamation, etc. When full truck quantities are accumulated, trucks are loaded in compliance with DOT, manifested, and shipped to final disposal facilities. The remaining wastes, with the exception of wastes that are reclaimed or processed for direct re-use, are treated as stated above with subsequent shipment to offsite TSDf's. Reclaimed materials and materials that can be directly used without treatment are sold to commercial businesses throughout the United States. (US)

## REGULATORY

### Primary agency contacts

***Colorado Department of Public Health  
Hazardous Waste Management Enforcement***

Ed Smith  
4300 S. Cherry Creek Dr.  
Denver, CO 80222-1530  
(303) 692-3386

***Colorado Department of Public Health  
Hazardous Waste Management Permits***

Tannell Roberts  
4300 S. Cherry Creek Dr.  
Denver, CO 80222-1530  
(303) 692-3355

***Colorado Department of Public Health  
Air Permit Engineer***

Mathew Burget  
4300 S. Cherry Creek Dr.  
Denver, CO 80222-1530  
(303) 692-3183

***EPA Region VIII***

Randy Lamdin  
999 18th Street Suite 300  
Denver, CO 80202-2466  
(303) 312-6350

***EPA Region VIII  
TSCA Contact***

Dan Bench  
999 18th Street Suite 300  
Denver, CO 80202-2466  
(303) 312-6027

***Tri-County Health Department  
(Air Pollution)***

Chuck Hix  
15400 East 14th Place, Suite 309  
Aurora, CO 80011  
(303) 341-9370

***South Adams County Water and Sanitation***

Patrick Maes  
6595 E. 70<sup>th</sup> Avenue  
Commerce City, CO 80037  
(720) 206-0488

***South Adams County Fire Department***

Kevin Vincel  
6550 E. 72<sup>nd</sup> Avenue  
Commerce City, CO 80022  
(303) 288-0835

## Environmental Permits

<i>State RCRA Part B Operating Permit</i>	Permit - CO-09-09-30-01 Expires – 09/30/2019
<i>South Adams County Water &amp; Sanitation District Zero Discharge Permit</i>	Permit – 215 Expires – 10/26/2015
<i>State Air Emissions Permit</i>	Permit - 95AD1089 Expires – N/A

### RCRA Part B Operating Permit

Veolia operates under the oversight of the Resource Conservation and Recovery Act (RCRA). RCRA, enacted in 1976, is the principal federal law in the United States governing the disposal of solid waste and hazardous waste. The facility operates under the requirements of a Part B permit issued by RCRA and the US Environmental Protection Agency (USEPA) in 1981.

[Congress](#) enacted RCRA to address the increasing problems the nation faced from its growing volume of municipal and industrial waste. RCRA amended the [Solid Waste Disposal Act of 1965](#). It set national goals for:

- Protecting [human health](#) and the [natural environment](#) from the potential hazards of waste disposal.
- [Energy conservation](#) and [natural resources](#).
- Reducing the amount of waste generated, through [source reduction](#) and [recycling](#)
- Ensuring the [management of waste](#) in an environmentally sound manner.<sup>[2]</sup>

The [U.S. Environmental Protection Agency](#) (EPA) has published waste management [regulations](#), which are codified in [Title 40 of the Code of Federal Regulations](#) at parts 239 through 282.<sup>[3]</sup> Regulations regarding management of hazardous waste begin in part 260.<sup>[4]</sup> Treatment, storage, and disposal facilities (TSDFs) manage hazardous wastes under RCRA Subtitle C and generally must have a permit in order to operate. The permitting requirements for TSDFs appear in 40 CFR Parts 264 and 270.<sup>[17]</sup> TSDFs manage (treat, store, or dispose) hazardous wastes in units that may include: container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, containment buildings, and/or drip pads. The unit-specific permitting and operational requirements are described in further detail in 40 CFR Part 264, Subparts J through DD.

The Henderson facility is classified by the U.S. Environmental Protection Agency (USEPA) and Colorado Department of Health and Environment (CDPHE) as a Treatment, Storage, Disposal, Facility (TSDF) in their respective regulations, **however, no disposal occurs at this facility**. The facility has modified its permit

with approval from the Colorado Department of Health and Environment throughout its history adding tank and drum storage capacity, distillation and solvent separation technologies, neutralization, repackaging, de-packing and rail loading/unloading. Most recently, the Colorado Department of Public Health and Environment renewed the Part B Permit in September 2009 with an expiration date of September 30, 2019. A renewal will be submitted to CDPHE in March 2019.

- *See Attachment No. 1 for a copy of the title page of the current RCRA Part B Hazardous Waste Permit.*

#### **CDPHE RCRA Inspections**

- *See Attachment No. 2 for a copy of the site's most recent CDPHE site inspections.*

#### **Industrial Wastewater Zero Discharge Permit**

- The Henderson facility has received a Zero Discharge Permit from South Adams County Water & Sanitation District. The Henderson facility is not allowed to discharge any wastewaters to the local district. All wastewaters are sent off-site for appropriate treatment and disposal. *See Attachment No. 3 for a copy of the Wastewater Zero Discharge Permit title page.*

#### **Stormwater Permit**

The Veolia Henderson facility does not discharge any stormwater from its property boundaries. All stormwater is contained on the facility property by means of earthen berms and a natural containment area. All runoff is conveyed to a storm water detention facility which utilizes evaporation to result in zero off-site discharge of runoff. The facility submitted a letter to the Colorado Department of Public Health and Environment on August 3, 2012 to terminate the facility stormwater permit and received approval from Colorado Department of Public Health and Environment on August 24, 2012.

- *See Attachment No. 4 for a copy of the Veolia Submittal Letter*
- *See Attachment No. 5 for a copy of the Agency Termination Response.*

#### **State Air Emissions Permit**

The Henderson facility operates in compliance with a Colorado Department of Public Health and Environment (CDPHE) Air Pollution and Control Construction Permit classified as a Synthetic Minor source. The permit regulates the emissions from the site's 32 above ground fixed roof tanks, thin film evaporation unit, Fractionation Column and Liquid-Liquid Extraction Column. CDPHE granted approval of this permit to the Henderson facility in October 1999, and was renewed on March 18, 2008. The facility has developed an agency approved air emission-monitoring program, which tracks emissions on a monthly basis. The program is based on the monthly waste volume throughput of all Waste Management Units.

- *See Attachment No. 6 for a copy of the facility's Air Permit.*
- *See Attachment No. 7 for a copy of the facility's air emission-monitoring program.*

#### **Self Inspections**

The Henderson facility conducts comprehensive inspections of all areas of the site. Frequencies of inspections include daily, weekly, monthly, semi-annual, and annual. Documentation is made of all inspections and is kept in binders on site.

*See Attachment No. 8 for a copy of the inspection forms used on site.*

# HAZARDOUS WASTE TREATMENT AND DISPOSAL

## Accepted Hazardous Wastes

The Henderson facility accepts and manages hazardous wastes identified and listed in Colorado Code of Regulations, Series Number 6 CCR 1007-3 Part 261 Hazardous Waste - Identification And Listing Of Hazardous Waste. The facility also accepts and manages non hazardous wastes that are not regulated Colorado Department of Environmental Health and the U.S. Environmental Protection Agency (USEPA).

The facility manages solid, semi-solid, lab packed chemicals and liquid hazardous wastes in containers and bulk quantities that meet the following general classifications:

Ignitable Waste	(I)
Corrosive Waste	(C)
Reactive Waste	(R)
Toxicity Characteristic Waste	(E)
Acute Hazardous Waste	(H)
Toxic Waste	(T)

**The Henderson facility is prohibited in the permit issued by CDPHE from accepting the below classifications of wastes.**

- Radioactive Material above background levels
- Infectious Material as defined by Colorado Code of Regulations
- Explosives as defined by the Department of Transportations
- Putrescible Municipal Garbage/Refuse

**The Henderson facility Treats and Stores Hazardous and Non-Hazardous Wastes in the methods listed below.**

### Bulk Liquid Storage Units

The Henderson facility has 21 RCRA permitted above ground storage tanks within tank farms #1, #2 and #3. These tanks range in size from 4,300 gallons to 12,000 gallons. These tanks are primarily utilized for storage of aqueous, organic solvent waste streams. The facility has 14 hazardous material above ground storage tanks within tank farm #3 and #4. These tanks are primarily utilized for storage of aqueous, organic solvent product and non-RCRA wastes.

In the event that a storage vessel is compromised and a spill occurs, secondary containment structures are in place to provide a belt and suspenders spill prevention / mitigation strategy. The secondary containment for the tank units is a concrete catchment structure capable of capturing leaking or spilling material prior to contact with the earth. The concrete is lined with a chemical resistant impervious coating. This coating prevents infiltration of chemicals into the concrete and is required by RCRA and CDPHE to prevent hazardous waste from exiting the containment area and making contact with the earth; the secondary containment systems have been designed to contain the capacity of the largest tank plus a 25 year, 24 hour rainfall event.

All Above Ground Storage Tanks (ASTs) meet or exceed all federal, state, and local requirements. This includes, where applicable, secondary containment, corrosion protection, high level alarms, daily tank

inspections, monitoring systems, and annual tank integrity testing. **There are no Underground Storage Tanks (USTs) at the Henderson facility.** A cryogenic vapor recovery system recovers a minimum of 95% of the total organic emissions from the hazardous waste tanks.

The Henderson facility also maintains a Spill Prevention Control and Countermeasure (SPCC) plan. This plan covers the onsite storage of oil products (in the form of waste) and PCBs.

### Container Storage Units

The Henderson facility is permitted to store containers in the following seven areas:

- Storage Area #1 EPA Container Pad - 176,000 gallons or 3200 55-gallon equivalent containers.
- Storage Area #2 Second Storage Pad – 100,650 gallons or 1830 55-gallon equivalent containers.
- Storage Area #3 Former Reliquification unit- 2750 gallons or 50 55-gallon equivalent containers.
- Storage Area #4 Tank Farm 1 - 6,600 gallons or 120 55-gallon equivalent containers.
- Storage Area #5 Distillation Unit - 8,250 gallons or 150 55-gallon equivalent containers.
- Storage Area #6 Warehouse - 54,560 gallons or 992 55-gallon equivalent containers.
- Storage Area #7 Rail Spur - 6 bulk cars with capacity of 25,000 gallons for each rail car.

The container storage units have concrete pads with dikes to separate incompatibles and for secondary containment. The secondary containment systems have been designed to contain 10% of all waste stored in the specific area as required by RCRA and CDPHE. All storage areas are protected from direct rainfall by the roof, except in Tank Farm 1 and the Distillation Unit. There is no run-on/run-off from any of the container storage areas. Any liquids, including storm-water, that are collected in the secondary containment areas are managed as a hazardous waste.

Containers are processed after verifying conforming material. Shipments may then be scheduled to other Veolia and third party facilities for treatment and disposal. All containers are visually inspected upon receipt. Containers that are leaking, rusting, or have the possibility to leak will be re-packed or over-packed.

### Thin Film and Fractional Distillation Column Reclaim Unit

Separation of specific components of liquid hazardous waste is performed in the thin film distillation and fractional distillation unit. These two pieces of equipment operate in series with the thin-film unit feeding vapor into the fractional distillation column. The vapors are re-condensed and the liquid is collected in tanks. The still bottoms that are not vaporized are collected and returned to tanks. The unit operates as an exempt treatment unit to perform solvent reclamation. The unit is located within a secondary containment area having a chemical resistant coating. A cryogenic vapor recovery system recovers a minimum of 95% of the total organic emissions from the unit.

### Polychlorinated Biphenyl (PCB) Operations

PCBs were widely used as [dielectric](#) and [coolant](#) fluids, for example in [transformers](#), [capacitors](#), and [electric motors](#). Due to PCBs' environmental [toxicity](#) and classification as a [persistent organic pollutant](#), PCB production was banned by the United States Congress in 1979 and by the [Stockholm Convention on Persistent Organic Pollutants](#) in 2001.<sup>[1]</sup> **Polychlorinated Biphenyl (PCB)** solids, liquids, capacitors, transformers, and light ballasts are wastes accepted at the facility. All incoming non-bulk PCB waste streams are stored in the warehouse.

**Incineration**

No incineration operations are conducted at the Henderson facility.

**Land Treatment and Disposal**

No land treatment or disposal operations are conducted at the Henderson facility.

**Waste Piles**

No waste stockpiling operations are conducted at the Henderson facility.

**On-Site Closed Units**

To date, there are NO closed waste management units at the Henderson facility. Waste Management Units permitted by CDPHE must be formally closed when they become inactive.

# HEALTH AND SAFETY

## Health & Safety Statistics

North American Industry Classification System (NAICS) 562211

	2012	2011	2010	2009
Experience Modification Rate (EMR)*	Pending	0.81	0.83	0.81
Work Hours	140,615	162,539	148,568	146,125
Fatalities	0	0	0	0
Recordable Only Cases	0	1	5	3
Restricted Duty and Transfer Cases	0	0	2	1
Lost Work Day Cases	0	0	0	0
Total Case Incident Rate (TCIR)**	0.00	1.23	6.73	4.11
DART Rate***	0.00	0.00	2.69	1.37

- \*An experience modification **rate** (EMR) refers to a number that worker compensation insurance companies use when calculating the risk of insuring a business.
- \*\*TCIR, or **Total Case Incident Rate**, is the generally accepted measure used to report workplace injuries across an industry or industry segment. TCIR is defined as the average number of work-related injuries incurred by 100 workers during a one-year period.
- \*\*\* **Days Away, Restricted, or Transferred (DART) Rate**: The DART rate includes cases involving days away from work, restricted work activity, and transfers to another job.

See Attachment No. 9 for a copy of EMR letters.

### Environmental Health and Safety Policy

It is the policy of Veolia ES Technical Solutions to conduct all operations in a safe and healthy manner. The health and safety of every employee is a fundamental consideration in every business decision and plan, and all reasonable precautions will be taken to protect employees from injury and illness. We are equally committed to protect the public, company property, and our customers from incidents that could cause harm or economic losses due to our operations.

Our goal is to prevent the occurrence of all work-related injuries, illnesses, and property losses. It is our philosophy that by striving to eliminate unsafe conditions and actions, we will eventually achieve this goal. All employees are expected to support and participate in the Health and Safety Program. Together, with teamwork, we can eliminate all workplace injuries and illnesses.

- See Attachment No. 10 for a copy of the table of contents for the EHS Policy

## Employee Training

New employees assigned to the operations, transportation, laboratory, and field services areas receive at least OSHA 40 hour training with 8-hour OSHA annual refreshers. This training is done in accordance with the HAZWOPER standard as outlined in 29CFR 1910.120. Each employee receives additional Contingency Plan training unique for our operations to the level the employee is expected to participate in an emergency event.

Employees receive job specific training under supervision as related to the operating unit assigned. The type and amount of training is determined by the specific duties assigned in the operating unit. Employees also receive special skills training based on assignment, such as confined space entry, material sampling, etc. Employees also receive continuing training through annual refresher training and monthly safety meetings as appropriate.

The following safety training sessions, when applicable, are given to site employees to ensure all proper safety precautions are taken with any given site activity:

- 40-Hour HAZWOPER
- 8 Hour HAZWOPER Annual Refresher
- Bloodborne Pathogens
- Bonding & Grounding
- Control of Hazardous Energy
- CPR
- DOT Security Awareness
- Drug & Alcohol Abuse
- Emergency Response/Contingency Plan
- Employee Notification
- Extreme Temp. Exposure Prevention
- First Aid
- Hazard Communication
- Hazardous Materials Transportation
- Health and Safety Plan
- Hot Work
- Incident Reporting
- Initial Orientation Training
- Materials Handling
- Medical Monitoring Program
- Occupational Noise Exposure
- Permit-Required Confined Space Entry
- Personal Protective Equipment
- Fire Prevention Training
- POTW & Surface Water Management
- Powered Industrial Trucks
- RCRA Regulations/Permit Conditions
- Respirator Fit Test
- Respiratory Protection
- Sample Protocol
- Sexual Harassment
- SPCC Training
- Supplied Air/SCBA
- Toxicology

Additional training, in the form of “Standard Division Practices” (SDP) is provided depending on the job function and duties of each individual employee.

## Drug & Alcohol Policy

- [See Attachment No. 11 for a copy of the Drug & Alcohol Policy](#)

## Safety Incentive Program

An Environmental Health and Safety Incentive Plan has been implemented for all non-managerial personnel in the Mountain Branch. The plan is designed to promote environmental, health and safety awareness by providing regular communication about Health and Safety to the employees and provide rewards for meeting certain EH&S activities and goals.

## Return to Work Plan

All employees who are injured on-the-job are encouraged to return to work as quickly as possible following a work-related injury. The facility has established working relationships with occupational health clinics in close proximity to our office. The occupational health clinics are affiliates of the Health Resources Network.

Whenever possible, employees are escorted by a member of the management team to their medical appointment following a work-related injury. The function of the manager is to ensure that the employee receives the necessary treatment, and to answer any questions of the attending medical professional regarding the availability of limited-duty work.

A written note from the attending medical professional is obtained to ensure the facility complies with the nature of the work restrictions. Limited-duty work is made available in all cases when the attending medical professional recommends it.

## SITE SECURITY

A chain-link fence surrounds property boundaries and active units as required by RCRA and CDPHE. Each gate leading into the facility is locked at all times. Warning signs are mounted at specified intervals along the fence preventing the unknowing from entering the active areas.

Twenty-four hour video surveillance has also been installed to monitor the warehouse container storage area, the drum storage pads, and the front gate.

## EMERGENCY RESPONSE CONTINGENCY PLAN

Each employee serving as an Emergency Coordinator (EC) receives thorough emergency response training. This training includes, but is not limited to, topics such as emergency alarm systems, evacuation, and spill and fire prevention.

Evacuation and Contingency Implementation Drills are conducted at a minimum of once a year. In addition, local outside response agencies and medical providers routinely tour the facility and discuss our Contingency Plan.

Implementation of the Contingency Plan requires notification of the following:

- Adams County Sheriff's Department
- The City of Commerce City Police Department
- So. Adams County Fire Department
- Adams County Emergency Preparedness Department
- St. Anthony Hospital, if injuries occur
- Colorado Department of Health
- Tri-County Health Department
- National Response Center

As noted earlier, formal drills/practices are conducted at least once a year beyond those conducted in each work area on a periodic basis through internal departmental training.

- *See Attachment No. 12 for a copy of the facility's Contingency Plan.*

The following emergency equipment is available on-site:

- First Aid Stations
- Telephone
- 2 - way radio
- Site-wide Alarm system
- Portable fire extinguishers
- Foam producing equipment
- Automatic sprinklers
- Water spray systems

- Decontamination equipment
- Self-contained breathing apparatus
- Trained First-Aid/CPR personnel

## LABORATORY

The Henderson facility maintains an on-site lab staffed with full-time chemists and lab technicians capable of running most analyses required for waste approval and fingerprinting.

- See Attachment No. 13 for a copy of the facility's Waste Analysis Plan.

### Sampling Policy

All waste streams are inspected for conformity with the associated paperwork. In the case of waste destined for the tanks and treatment systems, the waste is sampled to ensure compatibility with the tank contents or treatment system prior to pumping the material to the tanks. When sampling is required, 10% of the loads are sampled and analyzed.

## TRANSPORTATION

### Manifests

The records department maintains the operating records showing the description and quantity of each hazardous waste received by the facility. Copies are maintained until closure of the facility as required by RCRA and CDPHE.

In addition:

- Manifests are tracked and reported in an orderly manner.
- Records show date and method of treatment, storage, disposal of all waste received by the facility.
- Manifests are checked against the shipment and profile prior to accepting waste.
- Records reflect location of each hazardous waste within the facility including cross-references to specific manifest document numbers.

### Record-keeping and Waste Tracking

The Henderson facility meets or exceeds all waste tracking requirements as prescribed by federal and state law. A computerized tracking system is used to track all bulk and non-bulk waste streams for each movement in the facility until it is shipped off-site. All non-bulk waste containers are affixed with a bar coded label that is used to identify all pertinent information about the container and its location within the facility.

### Transportation Security

Veolia ES Technical Solutions has developed a USDOT Hazardous Materials Security Plan compliant with the requirements of 49 CFR Subpart I and, in addition, addresses compliance with the USEPA regulations in 40 CFR Subpart B regarding security for a permitted hazardous waste facility.

In accordance with CFR 49 Part 15, this plan is considered to be Sensitive Security Information (SSI) and has limited disclosure requirements. SSI must only be distributed to "covered persons" as defined in 49 CFR, §15.7 or persons with a "need to know" as defined in §15.11.

**See Attachment 4: Inactivation of Stormwater Permit**