VEOLIA
ENVIRONMENTAL SERVICES

TABLE OF CONTENTS

LIST OF APPENDICES

1. Facility Summary

Veolia ES Technical Solutions, L.L.C. (Veolia) provides a complete range of services for industrial and municipal customers needing to dispose of hazardous and regulated waste. The Electronics Recycling Branch of Veolia provides a complete range of recycling services for generators of universal waste batteries, lamps and mercury containing equipment; electronic waste; and lighting ballasts. With respect to lighting ballast waste, Veoliaarranges for disposal of polychlorinated biphenyls (PCB) and non-PCB fluorescent and high intensity discharge (HID) lamp ballasts. These ballasts are transported to Veolia facilities from throughout the United States. Upon arrival at Veolia, the lamp ballasts are segregated based on the type of ballast and whether or not the ballasts contain PCBs. This application provides detailed information regarding the procedures proposed to be used at the Veolia facility located at the below listed address:

Veolia ES Technical Solutions, L.L.C.
90 Pleasant Street
West Bridgewater, MA 02739
EPA ID# MAC300017498

1.1. Ballast Sorting Process Description

In-feed to the process consists of whole lamp ballasts in drums. All whole lamp ballasts containers will be staged in the commercial storage area where they will be opened and sorted. The sorting process will be conducted on all incoming containers. The incoming containers will be opened and the contents initially inspected for potential leaking PCB ballasts. After the initial inspection, all ballasts will be inspected and sorted by PCB containing and non-PCB containing ballasts. PCB containing ballasts are further sorted into disposal categories as required by the generator. These categories are PCB containing ballasts for incineration and PCB containing ballasts for landfill. Veolia will ensure that all PCB containing ballasts regardless of disposal category are properly containerized per US DOT requirements for shipment off-site to a Toxic Substance Control Act (TSCA) approved disposal facility.

Ballasts are also sorted into non-PCB categories of electronic and magnetic ballasts. These ballasts are consolidated and shipped off-site for further metals recovery.

1.2. Other On-site Activities

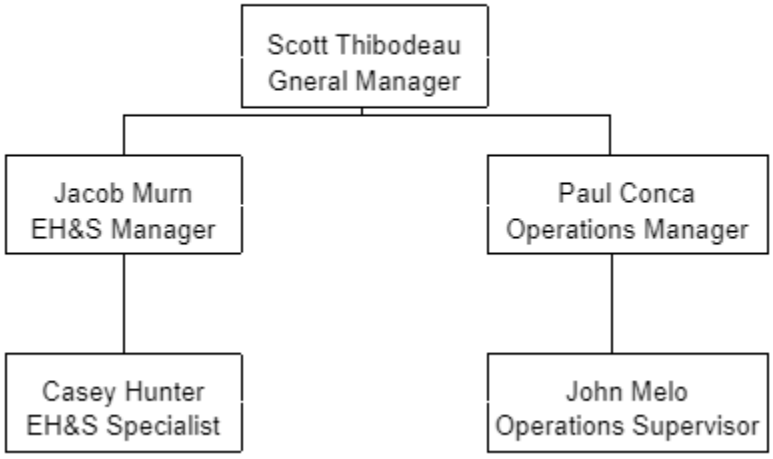
In addition to the lighting ballast activities, Veolia also recycles mercury containing manufactured articles, universal waste batteries and electronic waste. Each of these material types are managed and recycled within areas of the facility segregated from the PCB commercial storage.

2. Company and Facility Organization

Veolia is a wholly owned, indirect United States subsidiary of Veolia Environnement S.A., a publicly traded French company. Veolia is further divided into branches based either on regional characteristics or product type. Additional company information is included in Appendix I.

The Electronics Recycling Branch is the branch within Veolia with responsibility for the operation of the West Bridgewater facility. Scott Thibodeau, Branch General Manager, has overall responsibility for the operations of the branch. Paul Conca, Operations Manager, has responsibility for the Northeast Operations which includes the West Bridgewater facility. Jacob Murn, Environmental Health and Safety (EH&S) Manager, has responsibility for the overseeing the environmental health and safety programs of the branch, as well as, providing direct EH&S support to the West Bridgewater facility. Casey Hunter, EH&S Specialist, has a responsibility of overseeing EH&S responsibilities as they pertain to the West Bridgewater operation. John Melo, Operations Supervisor, is responsible for directly supervising the operations. Figure 1 below is an organizational chart for the key management personnel assigned to the West Bridgewater facility.

Figure 1
Organizations Chart



The resumes for each of the key managers listed above are included in Appendix II

3. Waste Description (Facility Inputs)

Veolia receives intact lamp ballasts from throughout the United States for disposal. There are three types of ballasts received at the facility, magnetic ballasts containing PCBs, magnetic ballasts not containing PCBs and electronic ballasts not containing PCBs. Upon arrival the ballasts that do not contain PCBs will be segregated from those containing PCBs and recycled separately. For the purpose of this application and unless specified the term ballast refers only to those ballasts containing PCBs at a concentration greater than or equal to 50 ppm.

The following information is based on a standard 4 foot magnetic lamp ballast. Ballasts for other size lamps will be proportionally larger or smaller based on the energy requirements of the lamp. Each ballast is nominally 2.5 inches wide, 2 inches high and 7 inches long and consists of a steel case enclosing a transformer composed of copper wire windings and a steel core and small capacitor, all of which is encased in a solid asphaltic potting compound. The capacitor is enclosed within a rectangular housing and is approximately 3.75 cubic inches in volume. These capacitors will contain 0.75 to 1 ounce of dielectric fluid. Those capacitors manufactured prior to the prohibition on the use of PCBs, as required by the TSCA regulations, will

contain PCBs in concentrations up to 100% PCB. The asphalt potting compound may contain PCBs at a concentration of greater than or equal to 50 ppm.

In addition to intact ballasts Veolia may also receive containerized leaking ballasts or ballast components for storage and disposal. These materials are segregated from the intact ballasts and accumulated for off-site disposal. When necessary, these materials may be repackaged to facilitate off-site shipment or compliance with PCB packaging regulations; however, these materials are not processed on-site.

The ballasts received by Veolia are transported to the facility in containers of various sizes approved by the US Department of Transportation for the transport of PCBs. The most common containers for the transport of PCB containing lamp ballasts are 55 gallon steel drums, UN specification 1A2, and 5 gallon poly pails, UN specification 1H2.

4. Commercial Storage Operations

In order to facilitate the consolidation, accumulation and storage operations described below in Section 6, Veolia is requesting approval to operate a commercial storage facility for the storage of lighting ballasts, both intact and leaking. This facility will be used for the storage of incoming and sortedlighting ballasts,for consolidation and accumulation prior to off-site shipment. Figure IV-5, Facility Floor Plan contained in Appendix IV, shows the overall configuration of the facility.

The facility normally operates two shifts per day Monday through Friday and one shift on Saturday. However, the facility has the potential to operate up to 24 hours per day, seven days per week. All PCB storage and processing activities take place indoors in a warehouse building. All entrances to the building are monitored/attended by facility employees working in the general vicinity of the entrance, during normal business hours, or remain closed and locked except while in use. The facility is equipped with a fire alarm system, but is not equipped with a security alarm system. Security for the PCB storage facility is maintained by keeping all entrances to the facility locked unless attended by an employee and by keeping all transport vehicles locked except when loading or unloading material from the vehicle. Waste-hauling vehicles enter the facility through the driveway off Pleasant Street and proceed along an asphalt paved driveway to the loading dock area. The driveway and parking lot provide adequate space for trucks to pull in, turn around and back up to the loading dock. Vehicles use the same driveway to Pleasant Street to exit the facility.

4.1. Site Location and Boundaries

The subject property is located in the Brockton Massachusetts topographic quadrangle map and has a Universal Transverse Mercator (UTM) coordinates of Zone 19, Easting 330,680 meters and Northing 4,652,786 meters. The property has one building on-site for a total of 55,000 square foot of total warehouse and office space. The street address of the facility is 90 Pleasant Street, West Bridgewater, Massachusetts. The site is comprised of a total of approximately 36.8 acres comprised of two parcels, a 29.27 acre parcel to the south of the facility that is undeveloped and a 7.46 acre parcel containing the facility building, driveway and parking area. The site is zoned industrial; however, a conditional use permit, in accordance with the Town of West Bridgewater By-laws, is required for the operation of a recycling facility. An application to the Zoning Board of Appeals (ZBA) was submitted by Veolia for the conditional use permit and two public meetings were held to obtain community input on the application. On November 14, 2011 the ZBA issued an approval for the conditional use permit and no challenges were received by the ZBA and the permit became final on December 5, 2011. Additionally, due to the fluorescent lamp and mercury recycling activities proposed for the site, a Site Assignment from the Board of Health and a Community Host Agreement were also required. A request for site assignment was submitted to the Board of Health and a public meeting was held on November 3, 2011. Following a review of the comments submitted during the public meeting and the report prepared by a consultant hired by the Board of Health, the Board approved the site assignment on December 1, 2011. Following the close of the appeal period, the site assignment became final and the Board of Selectmen executed the Community Host Agreement. A copy of the approved Community Host Agreement is included as Appendix III Community Agreements.

Appendix IV, Site Maps and Floor Plans, includes a copy of the below listed maps and site plans for the location of the proposed commercial storage facility.

- USGS Topographic Map, Brockton Quadrangle – Figure IV-1
- FEMA Flood Plane Map – Figure IV-2
- Aerial Photograph of the facility– Figure IV-3
- Facility Floor Plan Proposed – Figure IV-4
- Commercial Storage Area Plan– Figure IV-5
- Current Floor Plan Pre-Partial Closure– Figure IV-6
- Parcel Land Map - Figure IV-7

The nearest school is located approximately one mile to the east of the facility in the Town of West Bridgewater. The Hockomock swamp is adjacent to the parcel on which the facility is located, including the undeveloped parcel to the south of the facility. There are no underground tanks or drinking water supply wells at the site. The building is serviced by an on-site septic system; however, there are no drains within the warehouse, PCB storage area connected to the septic system. The residential properties located on the west side of Pleasant Street have been connected to the Town of West Bridgewater water supply. There are no industrial wastewater treatment systems and no active or closed land disposal units on the property.

4.2. Land Ownership

The property is owned by Veolia ES Technical Solutions, L.L.C. headquartered in Boston, Massachusetts..

4.3. Site Environmental Conditions

The facility is located at 90 Pleasant Street, West Bridgewater, MA and lies within the boundaries of the Hockomock Swamp Area of Critical Environmental Concern (ACEC). A portion of the facility property is classified as a wetland as noted on the Parcel Land Map contained in Appendix IV as Figure IV-7. The Flood Insurance Rate Map contained in Appendix IV as Figure IV-2, shows that the facility lies within an area of minimal flooding risk Zone C and is not located within a 100-year floodplain. The facility is not located within any public water supply protection areas, protected open space, or NHESP estimated habitats of rare wetland wildlife.

4.4. Description of PCB Management Activities

Veolia accepts PCB containing lamp ballasts as well as non-PCB lamp ballasts, e-waste and universal waste lamps and batteries. The PCB lamp ballasts are stored and processed within the designated PCB storage area. The process employed for the accumulation and consolidation of PCB lamp ballasts are described below in Process Engineering Section. Incoming materials, in-process materials and PCB containing ballasts for disposal are stored within the PCB storage area. Upon accumulation of an adequate volume to facilitate transport, accumulatied and consolidated PCB ballasts are shipped off-site as PCB wastes for disposal.

4.5. Identification of PCB Handling Areas

PCB storage and handling activities at Veolia shall be limited to the two areas identified below. The location of each area is identified in Figure IV-5, Facility Floor Plan, contained in Appendix IV.

4.5.1. TSCA Storage Area

Veolia operates a "TSCA Storage Area" that is designed in accordance with 40 CFR 761.65(b) standards. As shown in Appendix IV, Figure IV-5, there is one distinct operational area within the TSCA Storage Area: the PCB Sorting Area.

Additional information on each of these areas is provided in Section 7.1.2 below.

4.5.2. Loading Dock Area

The Loading Dock Area will be used for the shipping and receiving of PCB ballasts in containerized form. Containers of inbound or outbound PCB wastes may be staged in this area for up to 10 days without being considered to be a TSCA storage area. The unit consists of an indoor (roofed and walled) common floor area used for the shipping and receiving activities associated with Veolia's other recycling activities.

4.5.3.Other Areas

The Other Areas are assets/structures that provide support services related to Veolia's management of PCB's, but which are not PCB storage, treatment, or disposal units or processes requiring a USEPA TSCA approval. The Other Areas are identified under this application so that they may be included in confirmatory PCB sampling at the time of facility closure.

1) Vehicle Loading/Off-loading/Parking Areas – This area consists of the access areas to the loading docks as well as the truck parking area adjacent to the loading dock access area. This entire area is an asphalt paved surface.

2) Roadway System – An asphalt driveway on which all highway vehicles carrying PCB and non-PCB waste enter/exit the facility.

4.6. Detailed Description of PCB Handling Areas

4.6.1. PCB Storage and Sorting Area

4.6.1.1. Design Information

The PCB storage and sorting operation is conducted within a warehouse building and within a specially designed 2,583 square foot area which meets 40 CFR 761.65(b) PCB design criteria. A design certification statement prepared in accordance with 40 CFR 761.3.

The warehouse building is equipped with an overhead metal roof structure and is enclosed on all four sides with walls that extend from floor to roof. The exterior walls are generally of concrete block extending to the roof of the facility. Interior wall are generally constructed of dry-wall and metal studs. The roof/wall system is specifically designed to prevent infiltration of rainwater into the PCB storage area.

The floor is constructed of a poured reinforced concrete slab. The floor is smooth and continuous throughout the PCB storage area, and does not have any drain valves, sewer lines or other opening that would permit liquids to flow beneath the concrete. Expansion joints in the floor are equipped with water stops to eliminate liquid penetration through the joints. The entire floor surface is coated with an epoxy-based sealant that is compatible with PCBs in order to minimize penetration of PCBs into the concrete. As shown in Facility Floor Plan– Figure IV-5 the building, which houses the PCB Sorting Area and the Loading Dock Area are located at an elevation which is above the 100-year flood elevation.

Secondary containment in the TSCA Storage Area is provided by means of a continuous 6-inch high concrete berm which runs along the entire perimeter of the TSCA Storage Area. The joint between the berm and the floor isbe sealed with a PCB compatible epoxy sealer and the concrete berms themselves are coated with same type of epoxy-based sealer used for the floor of the storage area. Secondary containment calculations are provided in Section 4.8.3 below.

4.6.1.2. Layout and Process flow Information

The PCB ballast storage activities are conducted indoors within a bermed area that is 42 feet long by 61.5 feet wide, giving an overall TSCA storage area floor space of 2,583 square feet. The discussion below reflects the fact that most PCB wastes received by Veolia are generally managed in 55-gallon metal drums. However, Veolia notes that other container types such as cubic yard fiber boxes, smaller plastic pails and drums may also be received or used on-site as operational needs and customer demands dictate.

As shown in Commercial Storage Area Plan– Figure IV-6, is divided into two main areas as described below.

4.6.1.3. PCB Storage Area

The PCB storage area has sufficient capacity for 6 rows of containers placed onto pallets. Three of these rows have a capacity to store four double stacked pallets with each pallet holding a maximum of four 55-gallon drum equivalents for a total of 32 55-gallon drum equivalents per row. Three rows have a capacity to store four pallets with each pallet holding a maximum of four 55-gallon drum equivalents for a total of sixteen drum equivalents per row. Two rows have a capacity to store two pallets, holding a maximum of eight 55 gallon drum equivalents. This storage configuration provides a maximum capacity of 160 55-gallon drum equivalents in this area..

4.6.1.4. Ballast Sorting

Veolia personnel remove the ballasts from the incoming containers where the PCB ballast are separated from the non-PCB ballasts based on available label information. If the available labeling does not provide the appropriate "NO PCB's" marking, Veolia personnel locate the date stamp to identify the manufacture date. If it is possible to identify the manufacture date as being prior to July 1979, the ballast is assumed to be PCB bearing. All PCB bearing ballasts will be placed into outbound disposal containers. Prior to placement into outbound disposal containers, a technician removes the exterior wiring using hand held wire cutters. Outbound disposal containers will consist of PCB Ballasts for incineration or PCB ballasts for landfill. The wire is accumulated for off-site recycling as scrap metal.

4.6.1.5. Maximum PCB Inventory and Secondary Containment Calculations

The maximum PCB inventory for the Veolia facility is 160 55-gallon drums equivalents or a total of 8,800 gallons of PCB waste. This total is divided between two areas noted below.

1) PCB Storage Area – no more than 144 55-gallon drum equivalents (7,920 gallons) in three rows of double stacked pallet (96 55-gallon drum equivalents) and three rows of single-stacked pallets (48 55-gallon drum equivalents)
2) Sorting Area Storage - No more than sixteen 55-gallon drum equivalents (880 gallons) in two rows of two single-stacked pallets

For the purposes of this approval, containers of PCB wastes located within the shipping and receiving area will also be included in the on-site volume calculation and counted against the total inventory of PCB wastes.

The secondary containment volume for the PCB storage area is based on the capacity provided by the 6-inch berm, less any volume occupied by pallets, drums, or other pieces of equipment or building structures. As calculated below, approximately 1,939 square feet of floor space inside the TSCA Storage Area is occupied by pallets and other solid objects. This calculation assumes that each 55-gallon drum is 2 feet in diameter, each pallet is 4 feet long by 4 feet wide and that each interior wall (freezer and disassembly room) is on average 6 inches in thickness.

Occupied Floor Space

- 6 Rows of container storage occupying an area of four pallets (64 square feet) each for a total square footage of 384 square feet.
- 2 Rows of container storage occupying an area of two pallets (64 square feet) each for a total square footage of 336 square feet.
- 2 Row of container storage for non-PCB ballasts occupying an area of two pallets (64 square feet)
- Miscellaneous tools and equipment (forklift and such) for a total of approximately 50 square feet.
- Total Obstructed Square footage is 562 square feet, rounded to the nearest whole number.

4.6.2.Containment Capacity

Veolia will operate the facility under a "maximum PCB inventory" of 160 x 55-gallon drum equivalents, or 8800 gallons of PCB waste.

Therefore assuming a "worst-case" condition where the floor space that is occupied pallets, drums, and other structures/equipment is obstructed and unusable for secondary containment purposes, the adjusted maximum secondary containment volume is:

(Total square feet – obstructed square feet)* berm height = cubic feet of containment
(2583 sq. ft. – 562 sq. ft.)* 0.5 ft. = 1010.5 cubic feet

When calculated into gallons this volume of containment equates to a total of 7558.5 gallons (1010.5 cu. Ft. * 7.48 gal./cu. ft.).

Total containment volume = 7558.5 gallons

Pursuant to 40 CFR §761.65(b)1(ii), the secondary containment volume of a PCB storage area must provide a secondary containment volume equal to at least two times the internal volume of the largest PCB Container or 25 percent of the total internal volume of all PCB Containers stored there, whichever is greater. Veolia's secondary containment volume of 7558.5 gallons meets both of these criteria, as follows:

- Largest container = 220 gallon cube box; 7558.5gal. > 440 gal. (2*220)
- Total PCB Volume = 8800 gal.; 7558.5 gal. > 2200 gal. (8800*0.25)

4.7. Shipping/Receiving Area

PCB container shipping/receiving activities are conducted in the loading dock area to the south of the TSCA Storagr Area. Although this area is not subject to any specific TSCA design or management standards, is completely enclosed with a roof and wall system of similar design to the PCB storage area, and the floor is constructed of poured concrete. Access to the area from outside the building is provided by 11 overhead doors which are kept closed except during active loading and off-loading activities.

PCB activities in this area include the staging (up to 10 days) of inbound/outbound containers, and pre-acceptance and pre-transport inspection and paperwork review and preparation, since this area is not considered a PCB storage area, all PCB containers in this area shall be counted against the facility's maximum PCB storage inventory of 160 55-gallon drum equivalents as identified above.

4.8. Other Areas

The "other areas" designated for PCB support activities (i.e. vehicle parking area and the driveway system) are not subject to any specific TSCA design or management standards

5. Material Receiving

Upon arrival at the facility all shipments are visually inspected in accordance with Veolia receiving procedures. The purpose of the visual inspection is to ensure that the material being received matches the description of the material originally provided by the waste generator and that it is a material that Veolia is authorized to manage. The visual inspection also includes a review of the shipping papers/manifests and any continuation sheets that may be attached. If there are any significant discrepancies or the presence of non-conforming materials, the generator will be contacted to resolve those discrepancies. After verifying that all materials are acceptable and there are no significant discrepancies, the material will be accepted into the facility and the information required to be maintained as part of the facility operating log will be entered into the inventory tracking system. While this process is completed the incoming materials are staged in the shipping and receiving area of the facility. After the Operations Supervisor or his designee has approved the material for acceptance into the facility, the materials are routed to their designated storage/processing areas. Lighting ballasts that contain PCBs or PCB contaminated lighting ballasts wastes are moved into the PCB storage area for storage and sorting.

6. Process Engineering

The process engineering for the ballast sorting and storage operation is based on the EPA approved processes currently being used by Veolia at the West Bridgewater MA facility. The process of sorting and storage of lamp ballasts the process has been divided into two steps, material sorting and storage processes.

6.2 Storage

Containers identified as PCB ballasts on the profile and shipping paper that do not appear to contain any non-PCB ballasts, based on the initial inspection in the receiving process may be placed directly into a row for storage of PCB ballasts for disposal by either incineration or landfill. If the container is not filled it may be transferred into another outbound disposal container to maximize container capacities. Consolidating materials into outbound containers will minimize void space within disposal containers and maximize outbound shipments. When containers are identified as containing PCB and non-PCB ballasts, they may be staged for sorting in one of the six PCB storage rows, or be sorted when initially brought into the PCB storage area.

6.1. Sorting

All containers of ballasts are physically sorted to remove any non-PCB ballasts and to identify any potentially leaking ballasts. Containers identified as PCB ballasts on the profile and shipping paper that do not appear to contain any non-PCB ballasts, based on the initial inspection in the receiving process may be placed directly into a row for storage of PCB ballasts for disposal by either incineration or landfill. Any containers that are identified in the receiving process as containing mixed PCB and non-PCB ballasts will be sorted. Non PCB-containing ballasts will be sorted into magnetic and electronic outbound non-PCB containing ballast containers. PCB containing ballasts will be transferrerd into outbound disposal containers dependant upon requested disposal technology, incineration or landfill. If potentially leaking ballasts are identified during the sorting process, these ballasts and any other ballasts that may have been in direct contact with the material leaking from the ballast will be transferred to an outbound PCB containing container for incineration.

6.2. Pollution Control Systems

The PCBs aroclors have a very low vapor pressure, even at room temperatures, see the Material Safety Data Sheet included in Appendix VI. As such the potential for vaporization of the PCBs is minimal. In the event of the discovery of a leaking ballast, transferr of that ballast and ant other matherials that have come into contanct with the leaking liquid will be recontainerized immediately upon discovery therefore reducing any potential for vaporization of PCBs.

7. Sampling and Monitoring Plan

Sampling and analysis is required to demonstrate the proper operation of the facility. This includes the sampling of the following areas.

- Storage Areas
- Loading Dock/General Warehouse Area
- Personnel Decon/ Washroom

The below listed sampling procedures and analytical methods are based on those procedures and methods currently authorized under the commerical storer approval issued to the West Bridgewaterfacility.

7.1. Sampling Procedures

7.1.1.Storage Areas

Two wipe samples will be collected from the floor of the PCB storage area on a quarterly basis. Two randomly selected points within the storage area will be wipe sampled for PCBs using the standard wipe test as specified in 40 CFR § 761.125. The wipe samples will be submitted to a third party laboratory for analytical testing in accordance with EPA approved test methods as described in the Sample Analysis Procedures section.

7.1.2.Loading Dock/Warehouse Area

A wipe sample will be collected from the floor of the loading dock area and the warehouse area adjacent to the PCB storage area on a quarterly basis. Randomly selected points within the loading dock area and warehouse area will be wipe sampled for PCBs using the standard wipe test as specified in 40 CFR § 761.125. The wipe samples will be submitted to a third party laboratory for analytical testing in accordance with EPA approved test methods as described in the Sample Analysis Procedures section.

7.1.3.Personnel Decon/Washroom

A wipe sample will be collected from the floor of the Personnel Decon/Washroom on a quarterly basis. A randomly selected point within this area will be wipe sampled for PCBs using the standard wipe test as specified in 40 CFR § 761.125. The wipe samples will be submitted to a third party laboratory for analytical testing in accordance with EPA approved test methods as described in the Sample Analysis Procedures section.

7.2. Sample Analysis Procedures

All samples collected to demonstrate compliance with the above sampling procedures shall be tested by a third party analytical testing laboratory. The analytical procedures utilized for determination of PCB concentration will be those laboratory analytical procedures as defined in EPA Publication SW-846, *Test Methods for Evaluating Solid and Hazardous Waste, Physical/Chemical Methods.* Table 2 – Testing Methods contains a listing of the laboratory procedures that are currently being used for the analytical testing of PCBs in various matrixes. These methods are subject to change as laboratory procedures and SW-846 testing methods are updated.

Table 2 – Testing Methods

Description of Testing	Preparatory Method	Analytical Method
PCBs in solid wipe samples	SW3540C	SW8082

Veolia is currently using Eurofins MA for analytical testing of PCBs. Veolia anticipates continuing to use Eurofins. for future testing; however, Veolia may switch labs at its own discretion provided the laboratory follows the analytical testing procedures contained in SW-846.

8. Waste Handling

PCB wastes will include miscellaneous solids as summarized below:

- Miscellaneous other solids – used personal protective equipment such as gloves, disposable coveralls, and boot covers and cleaning items such as mop heads or used brooms that have been used inside the PCB storage and processing areas.

These waste will be accumulated and stored in accordance 40 CFR §761.65 and as described above within the Commercial Storage Operations section.

Upon accumulation of a sufficient quantity to facilitate off-site transport the materials will be manifested and transported to US EPA approved commercial storage or disposal facilities. Appendix VII contains a listing of EPA approved facilities that may be used for the disposal of this material.

9. Data Reporting and Record Keeping

As a part of its record keeping system, Veolia records, maintains and reports data required by 40 CFR § 761.180(b). Veolia uses a inventory management system for track lamp ballasts beginning with the receipt and through to the ultimate disposal of wastes and scrap. The system applies a unique identification number to each container of material received, and to receptacles for recyclable metals. The numbers are consolidated and layered upwards as segregation processing commences, such that any drum of ballasts may be traced forward to the disposal containers and metal shipment containers. This system together with signed manifests for PCB wastes transported to/from the facility for disposal and certificates of disposal for these wastes, comprise records allowing submittal of reports in accordance with TSCA regulations.

Results of laboratory analytical testing for quarterly floor wipe samples will be maintained within the facility records. The results of this analytical testing will be maintained electronically.

10. Inspection Procedures

The following inspections are performed during routine plant operations.

- Incoming Material Inspections – each container of ballasts received is opened and inspected for waste other than lamp ballasts and for leaking ballasts. If any container is found to contain a leaking ballast that container is immediately moved to the PCB storage area to await disposal of the entire container. In the case of smaller containers the entire container may be consolidated with other PCB wastes for off-site disposal.
- Process Area Floors and Containment Berms – the process area is inspected daily for wear or damage to the epoxy coating on the floor and berms and for signs of damage which could adversely impact the performance of the secondary containment system. If any damage or excessive wear is not the coating is reapplied or repaired.
- Process Equipment – all process equipment and tools are inspected before use and in accordance with manufacturer instructions. If there

are no specific manufacturer instructions, the tools will be inspected monthly for signs of damage.
- PCB Storage Containers – all PCB storage container are inspected daily for leakage or damage. Unsuitable containers are overpacked or replaced.

11. Contingency Plan

The Contingency Plan is included in Appendix VIII to this approval request.

12. Training Plan

The Training Plan is included as Appendix IX to this approval request.

13. Quality Assurance Program and Project Plans

Quality assurance and control procedures for handling, processing and disposing material are included in the document titled Ballast Processing SOP, Appendix X to this approval request. Quality assurance program plans for outside analytical laboratories are provided by these laboratories and will be made available to the EPA upon request.

14. Standard Operating Procedures

Veolia's operating procedures for its lamp ballast separation process, which includes material tracking and other routines is included the document titled Ballast Processing SOP, Appendix X to this approval request.

15. Test Data

The procedures outlined in this approval request have been used by Veolia's West Bridgewater MA facility. Results and chain of custody forms from the quarterly quality control testing for all floor wipe sampling that has been performed over the last three years areincluded in Appendix XI.

16. Closure Plan

The Closure Plan and Closure Cost Estimate are included in Appendix XII. This appendix also includes the supporting documentation for the closure cost estimate as obtained from third party facilities and contractors.

17. Closure Cost Assurance

Appendix XIII contains a copy of the current Performance Bond and Stand-by trust obtained by Veolia to provide for the closure cost assurance for the facility.

18. Company Financial Statements

See Appendix XIV for Veolia's audited financial statements for the year 2018 to 2021.

19. Compliance History

See Appendix XV for the facility's compliance history.