COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY
PIEDMONT REGIONAL OFFICE
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July 15, 2015

Mr. William Fowler
Facilities Maintenance Manager
Quality Investment Properties Richmond LLC
6000 Technology Boulevard
Sandston, VA 23150

WARNING LETTER

Re: WL No. 2015-07-PRO-652
EPA ID VAR000007534
Quality Investment Properties Richmond LLC
6000 Technology Boulevard
Sandston, VA 23150

Dear Mr. Fowler:

On May 7, 2015, the Virginia Department of Environmental Quality (DEQ) Piedmont Regional Office (PRO) conducted a compliance evaluation inspection (CEI) at Quality Investment Properties Richmond LLC doing business as QTS Data Centers (QTS; facility) located at 6000 Technology Boulevard, Sandston, Virginia. The CEI was conducted to evaluate facility compliance with applicable Virginia Hazardous Waste Management Regulations (VHWMR). During this inspection, the facility was evaluated to determine compliance with the Virginia Hazardous Waste Management Regulations (VHWMR). This facility had been identified in the RCRA Information System database as a Large Quantity Generator (LQG) of hazardous waste, or greater than 1,000 kilograms (kg) of hazardous waste generated per month (or greater than 2,200 pounds [lb]). Based on observations and hazardous waste manifest record review during the inspection, DEQ staff noted that QTS was operating as a LQG, and was evaluated for compliance with the applicable regulations for a LQG during this inspection. As a result of the CEI, several alleged violations (AV) of the Virginia Hazardous Waste Management Regulations (VHWMR) were observed and noted.

This letter addresses conditions at the facility noted during the compliance evaluation inspection and also cites compliance requirements of the Waste Management Law and Regulations. Pursuant to Va. Code §

10.1-1455(G), this letter is not a case decision under the Virginia Administrative Process Act, Va. Code § 2.2-4000 et seq. (APA). DEQ requests that you respond **within 20 days of the date of this letter.**

OBSERVATIONS AND LEGAL REQUIREMENTS

The following describe the staff's factual observations as documented during the CEI conducted on May 7, 2015, and identify the applicable legal requirements. The inspection checklists are attached.

1. **Observations:** At the time of the inspection, DEQ staff reviewed the facility's training documentation. It was noted that the facility contracted TPC Training Systems to maintain a training schedule that details each employee and what training is required. TPC will also send out notifications when training is required and monthly general awareness training. All staff members handling hazardous waste are trained initially by Mr. Fowler in hazardous waste management and on the contingency plan. Upon reviewing the training records, the facility was unable to provide documentation that the facility conducts an annual training for personnel whose positions at the facility are related to hazardous waste management.

   Legal Requirements: **Title 40 of the Code of Federal Regulations (CFR) Part 265 as referenced by Title 9 of the Virginia Administrative Code (VAC) 20-60-18 states…**

   265.16(c) Facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

   265.16(a)(1) Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this part. The owner or operator must ensure that this program includes all the elements described in the document required under paragraph (d)(3) of this section.

   (2) This program must be directed by a person trained in hazardous waste management procedures, and must include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed.

   (3) At a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including where applicable:

   (i) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;

   (ii) Key parameters for automatic waste feed cut-off systems;

   (iii) Communications or alarm systems;

(iv) Response to fires or explosions;

(v) Response to ground-water contamination incidents; and

(vi) Shutdown of operations.

(4) For facility employees that receive emergency response training pursuant to Occupational Safety and Health Administration (OSHA) regulations 29 CFR 1910.120(p)(8) and 1910.120(q), the facility is not required to provide separate emergency response training pursuant to this section, provided that the overall facility training meets all the requirements of this section

2. **Observations:** DEQ staff reviewed the facility's Oil Discharge Contingency Plan dated February 2013. At the time of the inspection the facility was unable to provide documentation that the contingency plan had been submitted to all local police and fire departments, hospitals, and State and local emergency response teams.

Legal Requirements: **Title 40 of the Code of Federal Regulations (CFR) Part 265 as referenced by Title 9 of the Virginia Administrative Code (VAC) 20-60-18 states…**

265.52 A copy of the contingency plan and all revisions to the plan must be:

(a) Maintained at the facility; and

(b) Submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

3. **Observations:** DEQ staff reviewed the facility's Oil Discharge Contingency Plan dated February 2013. The named facility primary emergency response coordinator is Mr. William Fowler, along with the several secondary emergency response coordinators listed. The home, work, and mobile phone numbers for each emergency coordinator are listed. However, the plan does not list the home addresses for each emergency coordinators.

Legal Requirements: **Title 40 of the Code of Federal Regulations (CFR) Part 265 as referenced by Title 9 of the Virginia Administrative Code (VAC) 20-60-18 states…**

265.52(d) The plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see §265.55), and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates.

4. **Observations:** DEQ staff reviewed the facility's Oil Discharge Contingency Plan dated February 2013. At the time of the inspection the contingency plan did not physically describe and identify the location of all emergency equipment at the facility.

   Legal Requirements: **Title 40 of the Code of Federal Regulations (CFR) Part 265 as referenced by Title 9 of the Virginia Administrative Code (VAC) 20-60-18 states…**

   265.52(e) The plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

5. **Observations:** DEQ staff reviewed the facility's Oil Discharge Contingency Plan dated February 2013. At the time of the inspection it appears that the contingency plan did not include provisions to ensure that the equipment is cleaned and fit for its intended use before operations are resumed.

   Legal Requirements: **Title 40 of the Code of Federal Regulations (CFR) Part 265 as referenced by Title 9 of the Virginia Administrative Code (VAC) 20-60-18 states…**

   265.56(h) The emergency coordinator must ensure that, in the affected area(s) of the facility:

   (2) All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

6. **Observations:** At the time of the inspection the facility was unable to provide documentation that the local hospitals have been notified with the properties of waste handled at the facility and the types of injuries or illness that could result.

   Legal Requirements: **Title 40 of the Code of Federal Regulations (CFR) Part 265 as referenced by Title 9 of the Virginia Administrative Code (VAC) 20-60-273 states:**

   265.37(a) The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:

   (4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

7. **Observations:** At the time of the inspection, the facility was unable to provide documentation that the facility had notified the department of the hazardous waste accumulation areas.

Legal Requirements: **Title 40 of the Code of Federal Regulations (CFR) Part 262 as referenced by Title 9 of the Virginia Administrative Code (VAC) 20-60-262 states:**

9 VAC 20-60-262.B.4 states: For accumulation areas established before March 1, 1988, a generator who is not otherwise exempted by 40 CFR 261.5 shall notify the director *department* of each location where he accumulates hazardous waste in accordance with 40 CFR 262.34 by March 1, 1988. For accumulation areas established after March 1, 1988, he shall notify the director *department* and document in the operating record that he intends to accumulate hazardous waste in accordance with 40 CFR 262.34 prior to or immediately upon the establishment of each accumulation area. In the case of a new generator who creates such accumulation areas after March 1, 1988, he shall notify the director *department* at the time the generator files the Notification of Hazardous Waste Activity that he intends to accumulate hazardous waste in accordance with 40 CFR 262.34. This notification shall specify the exact location of the accumulation area at the site.

8. **Observations:** DEQ staff observed (3) cubic yard fiberboard boxes and (1) 1/3 cubic yard container containing universal waste lamps. At the time of the inspection the (4) containers of universal waste lamps were not closed. Additionally, the (4) containers of universal waste lamps were not labeled "Universal Waste – Lamps", "Waste Lamps", or "Used Lamps". Finally, the facility was unable to demonstrate the length of time that the universal waste has been accumulated from the date it became a waste.

Legal Requirements: **Title 40 of the Code of Federal Regulations (CFR) Part 273 as referenced by Title 9 of the Virginia Administrative Code (VAC) 20-60-273 states:**

273.13(d) Lamps. A small quantity handler of universal waste must manage lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment, as follows:

(1) A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

273.14 A small quantity handler of universal waste must label or mark the universal waste to identify the type of universal waste as specified below:

(e) Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste—Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)".

273.15(c) A small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. The handler may make this demonstration by:

(1) Placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received;

(2) Marking or labeling each individual item of universal waste (e.g., each battery or thermostat) with the date it became a waste or was received;

(3) Maintaining an inventory system on-site that identifies the date each universal waste became a waste or was received;

(4) Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers of universal waste became a waste or was received;

(5) Placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received; or

(6) Any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

1. **Request for Information:** Inside the IWT Building, DEQ staff observed (1) 55-gallon steel drum labeled "Hazardous Waste", (4) 55-gallon steel drums labeled "Sump Solvent", (4) 55-gallon steel drums labeled "Sump Rinsate", (4) 55-gallon steel drums labeled "Tank Sludge", and (1) 55-gallon polyethylene drum that was un labeled. At the time of the inspection it was stated that the drum labeled "Hazardous Waste", was not suspected to be hazardous waste and that the label was inadvertently left on the container. Additionally, it was stated that the other (13) drums were not suspected to be hazardous waste but the facility needed to check with Cardno to be certain.

   On June 9, 2015, the facility stated that these drums were found to contain solvent waste from cleaning out old infrastructure and some contained the reinstate from the cleaning. They also stated that all of these drums are schedule to be shipped for disposal that week. The drums that were unlabeled were inspected and found to be empty or containing water. According to the facility, these have been removed.

   DEQ request that you submit the hazardous waste manifest for the shipment of the waste observed inside the IWT Building. Additionally, could you please provide any hazardous waste inspection logs for the time this hazardous waste was on site.

2. **Request for Information:** Outside the IWT Building, DEQ staff observed (11) 250-gallon polyethylene totes. At the time of the inspection it was stated that the totes contains spent sodium

hydroxide solution and rinsate from the demolition activities associated with the removal of the sodium hydroxide tank. Additionally, it was stated that the (11) totes were currently being evaluated to make a hazardous waste determination and the facility needed to check with Cardno to be certain. It was also stated that this waste was generated on May 1, 2015.

On June 9, 2015, the facility submitted waste profile information indicating that the waste in the totes is hazardous for corrosivity (D002). The facility also indicated that the these totes have shipped off-site for transportation and disposal.

DEQ request that you submit the hazardous waste manifest for the shipment of the waste observed outside the IWT Building. Additionally, could you please provide any hazardous waste inspection logs for the time this hazardous waste was on-site.

Additional Concerns: During the inspection DEQ staff observed that the facility generates used aerosols including paints and lubricants. At the time of the inspection there were no discarded empty aerosol cans. The facility is advised that the used aerosol canisters would be classified as a hazardous waste unless punctured and would need to be disposed of accordingly. Included with this inspection report is a document on the management of aerosol cans.

ENFORCEMENT AUTHORITY

Va. Code § 10.1-1455 of the Waste Management Act provides for an injunction for any violation of the Waste Management Act, Waste Management Board regulations, an order, or permit condition, and provides for a civil penalty up to $32,500 per day of each violation of the Waste Management Act, regulation, order or permit condition. In addition, Va. Code § 10.1-1455(G) authorizes the Waste Management Board to issue orders to any person to comply with the Waste Management Act and regulations, including the imposition of a civil penalty for violations of up to $100,000. Also, Va. Code § 10.1-1186 authorizes the Director of DEQ to issue special orders to any person to comply with the Waste Management Act and regulations, and to impose a civil penalty of not more than $10,000. Va. Code §§ 10.1-1455(D) and 10.1-1455(I) provide for other additional penalties.

The Court has the inherent authority to enforce its injunction, and is authorized to award the Commonwealth its attorneys' fees and costs.

FUTURE ACTIONS

After reviewing this letter, please respond in writing to DEQ **within 20 days of the date of this lette**r detailing actions you have taken or will be taking to ensure compliance with state law and regulations. If corrective action will take longer than 90 days to complete, you may be asked to sign a Letter of Agreement or enter into a Consent Order with the Department to formalize the plan and schedule. *It is DEQ policy that appropriate, timely, corrective action undertaken in response to a Warning Letter will avoid adversarial enforcement proceedings and the assessment of civil charges or penalties.*

Please advise us if you dispute any of the observations recited herein or if there is other information of which DEQ should be aware. In the event that discussions with staff do not lead to a satisfactory conclusion concerning the contents of this letter, you may elect to participate in DEQ's Process for Early Dispute Resolution. Also, if informal discussions do not lead to a satisfactory conclusion, you may

request in writing that DEQ take all necessary steps to issue a final decision or fact finding under the APA on whether or not a violation has occurred. For further information on the Process for Early Dispute Resolution, please see Agency Policy Statement No. 8-2005 posted on the Department's website under "Programs," "Enforcement," and "Laws, Regulations, & Guidance" (which may be obtained at the following link: http://www.deq.virginia.gov/Portals/0/DEQ/Enforcement/Guidance/process%20for%20early%20dispute%20resolution%20no8_2005.pdf or ask the DEQ contact listed below. The inspection checklists are enclosed for your review. In addition, the Federal and Virginia Hazardous Waste Management Regulations may be obtained at: http://www.deq.virginia.gov/Programs/LandProtectionRevitalization/SolidHazardousWasteRegulatoryPrograms/HazardousWaste.aspx.

If you have questions or wish to arrange a meeting, you may reach me directly at (804) 527-5028 or jason.miller@deq.virginia.gov.

Sincerely,

Jason A. Miller

Jason A. Miller
Land Protection Program Manager
Piedmont Regional Office

cc: Case File *(electronic)*

Enclosures: Hazardous Waste Survey Sheet
Large Quantity Generator Checklist
Health and Safety Checklist
Container Management Checklist
Universal Waste Management Checklist
Aerosol Canister Management

Hazardous Waste Survey Sheet

Facility Name	Quality Investment Properties Richmond, LLC	EPA ID Number	VAR00007534

Physical Address	6000Technology Boulevard	City	Sandston	State	VA	Zip	23150
Mailing Address	Same as physical	City		State		Zip	
Facility Representative(s)		Contact Information					
Mr. William Fowler, Facilities Maintenance Manager		Tel.	(804) 952-8421				
		Fax.	N/A				
		E-mail	william.fowler@qtsdatacenters.com				

DEQ Representative(s)	Date	Type of Inspection
Ryan Smith	May 7, 2015	Compliance Evaluation Inspection

1 BUSINESS DESCRIPTION

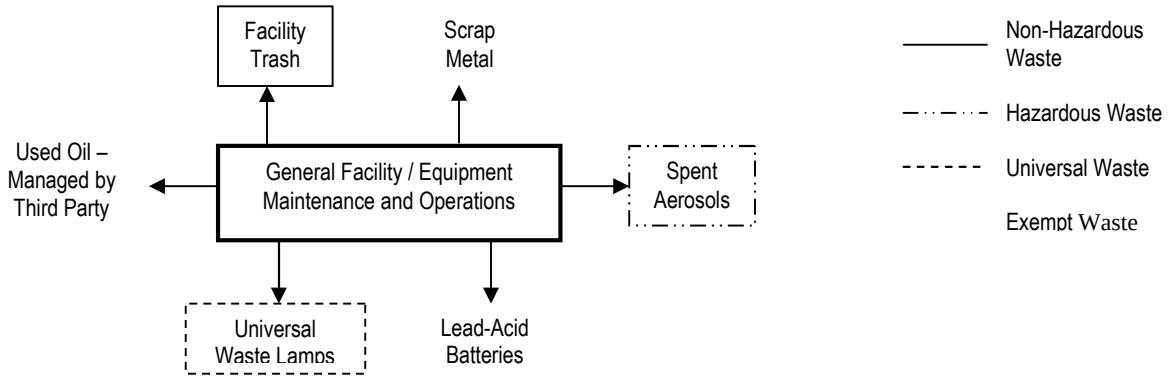
What is the business activity of the firm? (i.e., furniture manufacturing, metal plating, recycling)

Other Computer Related Services

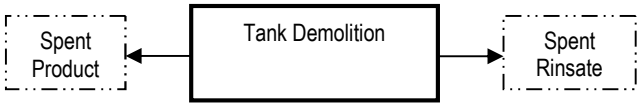
SIC Code(s)		NAICS Code(s)	541519

Provide a description of processes and/or processes generating wastes. Attach a flow diagram for on-site waste management processes (other than simple satellite/container accumulation, unless relevant).

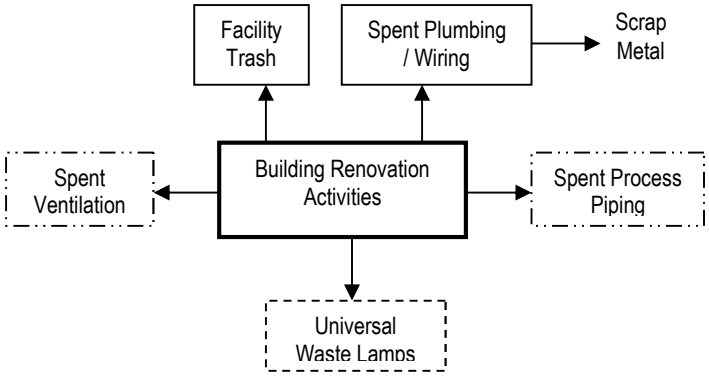
General Facility Processes



Industrial Waste Treatment Demolition (currently ongoing)



Building Renovation (planned)



2 WASTESTREAM(S)

Give a brief description of the waste stream(s) (by chemical name, if possible) and hazardous waste code(s) generated by the facility.

Hazardous Waste (varies depending on renovation activities)
Spent Aerosols – D001
Spent Sodium Hydroxide – D002
Spent Rinsate – D002

Exempt Materials
Spent Lead – Acid Batteries

Non-Hazardous Waste
Scrap Metal
Plant Trash

Universal Waste
Lamps

3 GENERATION RATE(S)

(a) List the (a) nominal amounts of hazardous waste generated in any month and (b) the greatest amounts of all wastes ever accumulated/generated at the site if applicable to generator category determination (i.e.. if a CESQG, have they ever exceeded 1000 kg accumulation, or if a SQG have they ever exceeded 1000 kg/mo generation for all waste streams aggregate).		
Waste codes	(a) Amount generated in any month	(b) Greatest amounts of ever accumulated
Varies	Varies	Approximately 22,536 pounds

4 ACUTE HAZARDOUS WASTE	Yes	No	NA
(a) Has the facility generated >1 kg/mo of *acute* hazardous waste (P-list)?		X	
(b) Has the facility generated >100 kg of *acute* hazardous waste from spill clean-up residue?		X	

5 EXCLUSIONS	Yes	No	NA
(a) Does the facility generate any hazardous waste that is excluded from regulation? (i.e., reclaimed on-site, used as a substitute for a CCP, de-characterized by treatment). If yes, list the waste and the basis for the exclusion.		X	
COMMENTS:			

6 PRECIOUS METALS RECYCLING	Yes	No	NA
(a) Does the facility generate any hazardous waste that is reclaimed to recover economically feasible amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these?		X	
(b) If yes, list the waste and where it is sent. Verify compliance with Part 266 Subpart F and provide comments:			

7 SPENT LEAD-ACID BATTERIES (not managed as universal waste)	Yes	No	NA
(a) Does the facility generate, transport, store, collect, or reclaim spent lead acid batteries? [Facilities storing lead-acid batteries and reclaiming them on-site are subject to Part B requirements.]	X		
(b) If yes, indicate the management method. Verify compliance with applicable Part 266 Subpart G requirements and provide comments: (3)Will be reclaimed other than through regeneration			

8 ACCUMULATION TIME AND QUANTITY	Yes	No	NA	NC
(a) Has the facility accumulated hazardous waste in excess of time and quantity limits established for their generator class? [NOTE: CESQGs may not accumulate >1000 kg, a SQG may not accumulate > 6000 kg or accumulate >180 days (or 270 days), and a LQG may not accumulate > 90 days.]		X		
(b) Has the facility *episodically* generated hazardous waste in excess of their normal generator category? [Note: Applicable generator category requirements apply to *ALL* wastes during the period of generation and for as long as the waste remains on-site.]		X		

9 OFF-SITE SHIPMENT

How is the waste presently being handled? Where is it sent? (List all transporters and facilities, or on-site treatment performed.)		
Transporters/TSD Facility	EPA ID Numbers	On-site Treatment
Transporter Envirite of Pennsylvania, Inc. DKB Trucking LLC., Company Freehold Cartage, Inc. **Destination Facility** Envirite of Pennsylvania, Inc. Giant Resource Recovery Sumter, Inc. EQ Detroit, Inc.	 PAD010154045 VAR000507244 NJD054126164 PAD010154045 SCD036275626 MID980991566	Will treat characteristically corrosive waste in elementary neutralization tanks and discharge to the local POTW

10 FACILITY UNIVERSE

Based on the above information, the facility is considered to have acted as and is being evaluated for this inspection as a:

_____ Conditionally exempt small quantity generator (CESQG)
_____ Small quantity generator (SQG)
X Large quantity generator (LQG)
_____ Permitted or interim status TSDF
_____ Transporter
X Other: explain **SQUWH**

NOTE: If episodic generation has occurred, assign an appropriate generator status for this evaluation and assess compliance during/for the episodic period.

COMMENTS:

11 VIRGINIA SPECIFIC REQUIREMENTS FOR NOTIFICATION AND FEEs

	Yes	No	NA	NC
(a) Is the facility subject to the annual fee as a permitted facility or generator? (9 VAC 20-60-1283)	X			
(b) For facilities subject to the annual fee, has the fee been paid for the previous billing year?	X			
(c) For new, episodic or provisional generators, has the facility provided notification to DEQ that it is a generator by submitting documentation to the Regional Office as required under 9 VAC 20-60-315 and 20-60-1283?			X	

12 VIRGINIA ENVIRONMENTAL EXCELLENCE PROGRAM (VEEP) & NATIONAL PERFORMANCE TRACK

(a) Is the facility a participant in the VEEP? ____ Yes __X__ No

(b) If yes, at which level is the facility participating?

_____ E2 – Environmental Enterprise

_____ E3 – Exemplary Environmental Enterprise

_____ E4 – Extraordinary Environmental Enterprise

13 GENERAL COMMENTS

On May 7, 2015, the Virginia Department of Environmental Quality (DEQ) conducted an unannounced compliance evaluation inspection (CEI) at Quality Investments Properties Richmond LLC, doing business as Quality Technology Services Data Centers (QTS; the facility) located at 6000 Technology Boulevard, Sandston, Virginia. The inspection was conducted to evaluate facility compliance with applicable Virginia Hazardous Waste Management Regulations (VHWMR). Representing the facility was Mr. William Fowler, Facilities Maintenance Manager. Based on the observed facility conditions at the time of the visit, the facility was determined to be operating as a large quantity generator (LQG) of hazardous waste and generator of universal waste. DEQ staff conducted a verbal exit interview with facility staff reviewing the applicable hazardous waste regulations. During the CEI, DEQ staff observed and noted alleged violations with the VHWMR.

GENERAL FACILITY AND WASTE GENERATING PROCESS INFORMATION

According to a QTS document, "QTS (Quality Technology Services) is a leading national provider of data center facilities and professionally managed IT, cloud computing, and hosting services to enterprise businesses. With 12 locations in eight states, QTS operates and manages more than 3.5 million square feet of secure, state-of-the-art data center infrastructure and provides mission-critical IT operations for performance and cost-efficiency. Global enterprises, financial companies, and services providers rely upon QTS's ITIL certified services organization and expertise to manage their mission-critical IT infrastructures. QTS uniquely combines customized data center solutions, collocation and fully managed hosting solutions to over 600 customers in the United States." The QTS Richmond facility is data center that provides security, connection, cooling, and power for their customer's data centers. The facility currently has approximately 35 employees and operates 24 hours a day seven days a week.

QTS purchased the former semiconductor plant (Qimonda) in September 2010. The facility currently consist of 210 acres and over 1.3 million square feet consisting of administration offices, security building, data centers (DC-1, DC-2, and DC-3), central utility building (CUB-1 and CUB-2), and industrial waste water treatment building (IWT). QTS is located in rural area east of Richmond, Virginia. The nearest surface water body is an unnamed tributary to White Oak Swamp, located approximately 500 feet west of the facility.

At the time of the inspection the facility the security building, administration offices, and DC-1 was fully operational. The facility had renovated DC-1 (former PAT) and is currently renovating DC-2 (former FAB-1), IWT, CUB-1, and CUB-2. The facility is currently scheduled to complete the renovation of these buildings along with DC-3 (former FAB-2) by the end of 2016. The facility has decided to keep their large quantity generator (LQG) status until renovation activities are completed. At that time the facility anticipates they will change their generator status to a conditional exempt small quantity generator (CESQG).

During the renovation process for DC-2 and DC-3, the facility will need to remove all process piping and ventilation from the former semiconductor plant, along with plumbing and electrical lines. The facility is contracted with Cardno to first collect samples and test the former process piping and ventilation to determine if the waste is hazardous. If the material is determined to be hazardous then Carndo will handle the deconstruction, packaging, and shipments for disposal. If the material is determined to be non-hazardous then the facility's demolition contractor (CRD) will complete the demolition and disposal. The facility will send much of the process piping, ventilation, plumbing, and electrical lines that are deemed non-hazardous out as scrap metal for recycling.

Additionally, the facility closed the IWT at the end of 2014 and is currently in the process of the demolition associated with the process tanks. The facility is containerizing any remaining product in the tanks as well as the rinsate water in order to make a proper waste determination and ship off-site for re-use or disposal. Depending on the nature of the hazardous waste generated, the facility also has the potential to treat corrosive waste (D002) in elementary neutralization tanks. The treated waste may then be sent to the local POTW for final disposal.

During the data center operations, the facility will not generate any hazardous waste. During general facility operations the facility will generate used aerosol canisters, used oil, universal waste lamps, universal waste batteries, and non-hazardous facility trash. The facility generates used aerosols including paints and lubricants. At the time of the inspection there were no discarded empty aerosol cans. DEQ advised the facility that the used aerosol canisters would be classified as a hazardous waste unless punctured and would need to be disposed of accordingly. Included with this inspection report is a document on the management of aerosol cans.

The facility currently generates used oil from generators, vehicles, and forklifts which is managed by a third party (Carter Machinery). No used oil is stored at the facility. The universal waste lamps are placed in fiberboard boxes located near the area being renovated. The facility will also generate lead-acid batteries which are sold back to PSE Metals for recovery.

BACKGROUND

Review of the U.S. Environmental Protection Agency (EPA) and State data system indicates that the facility (Quality Investment Properties of Richmond LLC) originally notified of Resource Conservation and Recovery Act (RCRA) Subtitle C Activities in 2012 and has not yet previously been inspected for compliance to hazardous waste regulations.

Hazardous Waste
Large Quantity Generator Checklist

Facility Name Quality Investment Properties Richmond LLC EPA ID NUMBER VAR000007534

DEQ Representative(s) Ryan Smith Date May 7, 2015

REGULATION [40 CFR CITATION]	YES	NO	NA	NC
SECTION A – MANIFEST				
1. Does generator ship waste off-site? [262.20]	☒	☐	☐	☐
2. Does generator use manifest? [262.20]	☒	☐	☐	☐
a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month?) NOTE: SQGs are only exempt if wastes are reclaimed. [262.20(e)]	☐	☐	☒	☐
1. If yes, does generator indicate this when sending waste to a TSD facility?	☐	☐	☒	☐
b. If yes, does manifest include the following information? [Part 262 Appendix]				
1. Manifest tracking no.	☒	☐	☐	☐
2. Generator's name, mailing address, telephone no and site address.	☒	☐	☐	☐
3. Generator EPA I.D. no.	☒	☐	☐	☐
4. Transporter Name(s) and EPA I.D. no.(s)	☒	☐	☐	☐
5. Facility name, address, and EPA I.D. no.	☒	☐	☐	☐
6. Alternate facility name, address, and EPAI.D. no.	☒	☐	☐	☐
7. Instructions to return to generator if undeliverable	☒	☐	☐	☐
8. Waste information required by DOT – shipping name, quantity (weight or vol.), containers (type and number) and waste codes,	☒	☐	☐	☐
9. Emergency information (optional) (special handling instructions, telephone no.)	☒	☐	☐	☐
10. Is the following certification on each manifest form? "**GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent."	☒	☐	☐	☐
11. Does generator retain copies of manifests? [262.40] If yes, complete a through g. [262.23]	☒	☐	☐	☐
a. Did generator sign and date all manifests?	☒	☐	☐	☐
b. Did generator obtain handwritten signature and date of acceptance from initial transporter?	☒	☐	☐	☐
c. Does generator retain one copy of manifest signed by generator and initial transporter? [262.40]	☒	☐	☐	☐
d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? [262.40]	☒	☐	☐	☐
12. Have manifests been received from the TSD facility for any waste which was shipped over 45 days ago? [262.42]	☐	☒	☐	☐
a. If no, has the generator filed an exception report?	☐	☐	☒	☐
b. Does the exception report include:				
1. a legible copy of the manifest for which the generator does not have confirmation of the delivery? and	☐	☐	☒	☐

Hazardous Waste
Large Quantity Generator Checklist

REGULATION [40 CFR CITATION]	YES	NO	NA	NC
2. a cover letter explaining the efforts taken to locate the shipment?	☐	☐	☒	☐
SECTION B – HAZARDOUS WASTE DETERMINATION [262.11]				
3. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)?	☒	☐	☐	☐
4. Does generator generate solid waste(s) listed in Subpart C that exhibit hazardous characteristics (corrosivity, ignitability, reactivity, TC)?	☒	☐	☐	☐
a. Does generator determine characteristics by testing or by applying knowledge of processes?	**Both**			
1. If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)?	☒	☐	☐	☐
5. Has the generator evaluated all solid wastes to determine whether the solid wastes are hazardous wastes?	☒	☐	☐	☐
SECTION C – PRETRANSPORT REQUIREMENTS				
6. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? [262.30]	☒	☐	☐	☐
a. Are containers to be shipped leaking or corroding?	☐	☒	☐	☐
b. Complete **Checklist 4. Containers** to evaluate condition of containers.				
c. Is there evidence of heat generation from incompatible wastes in the containers?	☐	☒	☐	☐
7. Does generator follow DOT labeling requirements in accordance with 49 CFR 172? 262.31	☒	☐	☐	☐
8. Does generator mark each package in accordance with 49 CFR 172? 262.32	☒	☐	☐	☐
9. Is each container of 110 gallons or less marked with the following label? 262.32 HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.	☒	☐	☐	☐
a. Generator name(s) and address(es)	☒	☐	☐	☐
b. Manifest document No.	☒	☐	☐	☐
10. Does generator have placards to offer to transporters? [262.33]	☒	☐	☐	☐
11. Accumulation time? [262.34]				
a. Are containers used to temporarily store waste before transport?	☒	☐	☐	☐
1. If yes, is each container clearly dated. 262.34(a)(2)	☐	☐	☒	☐
2. If yes, is each container labeled or clearly marked with the words "Hazardous Waste?" [262.34(a)(3)]	☐	☐	☒	☐
12. Does the generator have satellite accumulation areas where up to 55 gallons of any one type of hazardous waste (HW) (1qt acutely HW) are accumulated? [262.34(c)(1)] If yes,	☐	☒	☐	☐
a. Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container? [262.34(c)(1)(ii)]	☐	☐	☒	☐
13. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? [262.34(c)(1)] If yes,	☐	☐	☒	☐
a. Has the generator marked the excess amount with the date the excess amount began accumulating? and	☐	☐	☒	☐
b. Has the generator either removed the excess amount within three days of the date of excess accumulation or has the generator complied with all other provisions for accumulation areas? Namely, has the generator notified the Executive Director about the location of the accumulation area?	☐	☐	☒	☐
SECTION D – RECORDKEEPING AND RECORDS 262.40				
14. Does generator keep the following reports for 3 years:				

Hazardous Waste
Large Quantity Generator Checklist

REGULATION [40 CFR CITATION]	YES	NO	NA	NC
a. Manifest or signed copies from designated facilities?	☒	☐	☐	☐
b. Biennial reports?	☒	☐	☐	☐
c. Exception reports?	☐	☐	☒	☐
d. Test results?	☒	☐	☐	☐
15. Where are the records kept (at facility or elsewhere)?	At the facility			
SECTION E – SPECIAL CONDITIONS				
16. Has the primary exporter received from or transported to a foreign source any hazardous waste?	☐	☒	☐	☐
a. If yes, has he filed a notice with the Regional Administrator? [262.53]	☐	☐	☒	☐
b. Is this waste manifested and signed by a foreign consignee? [262.54]	☐	☐	☒	☐
c. If generator transported wastes out of the country, has he received confirmation of delivered shipment? [262.54]	☐	☐	☒	☐
SECTION F – LDR REQUIREMENTS [268]				
17. Has the generator determined whether the hazardous waste has to be treated before it can be land disposed? [268.7(a)(1)] If yes, go to the next question. If no,	☒	☐	☐	☐
a. has the generators alternatively chosen to send the waste to a RCRA-permitted hazardous waste treatment facility, where the waste treatment facility will comply with the requirements of 264.13 and 268.7(b)?	☐	☐	☒	☐
b. has the generator accompanied the initial shipment of waste with a notification to the treatment facility which includes the following information? [268.7(a)(2)]	☐	☐	☒	☐
(i) EPA Hazardous Waste Number?	☐	☐	☒	☐
(ii) The manifest number associated with the initial waste shipment?	☐	☐	☒	☐
(iii) The following statement?: "This hazardous waste may or may not be subject to the LDR treatment standards. The treatment facility must make the determination?"	☐	☐	☒	☐
18. If the generator has determined whether the hazardous waste has to be treated before it can be land disposed. For restricted wastes which the generator is managing for which he has not met the applicable treatment standards, has the generator accompanied the initial shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions? [268.7(a)(1) and 268.7(a)(2)]	☒	☐	☐	☐
19. Is land disposal of wastes occurring? If yes,	☐	☒	☐	☐
a. Has the facility been granted an extension to the effective date for land restriction applicable to its restricted waste? OR	☐	☐	☒	☐
b. Has the facility been granted an exemption from prohibition pursuant to a petition for those land-restricted wastes and units covered by the petition? OR	☐	☐	☒	☐
c. Are the wastes hazardous only because they exhibit a hazardous characteristic and are they disposed outside the Commonwealth into an injection well without exhibiting any prohibited characteristic of hazardous waste at the point of injection?	☐	☐	☒	☐
20. Has the owner/operator submitted an application for case-by-case extension to the effective date of any applicable restriction? [268.5]	☐	☒	☐	☐
21. Has the owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units? [268.6]	☐	☒	☐	☐
22. Are facility representatives diluting the restricted waste or residual from treatment of the restricted waste as a substitute for adequate treatment, to circumvent the effective date of prohibition, to otherwise avoid a prohibition, or to circumvent a land disposal prohibition? [268.3]	☐	☒	☐	☐

Hazardous Waste
Large Quantity Generator Checklist

REGULATION [40 CFR CITATION]	YES	NO	NA	NC
23. Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments? (Note: Evaporation of hazardous constituents in a surface impoundment as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.) [268.4]	☐	☒	☐	☐
24. If yes, complete **Check Sheet 12. Surface Impoundments.**				
25. Is the facility treating waste in Tanks or Containers in order to meet applicable treatment standards under 268.40?	☐	☒	☐	☐
26. If Yes, has the facility developed a Waste Analysis Plan? [268.7(a)(4)]	☐	☐	☒	☐
27. Is the Waste Analysis Plan available for inspection? [268.7(a)(5) (ii)]	☐	☐	☒	☐
28. Restricted wastes, for which the generator is managing and has not met the applicable treatment standards, has the generator accompanied each shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions? [268.7(a)(1)]	☒	☐	☐	☐
29. Did the notification include the following information:				
a. EPA Hazardous Waste Number? [268.7(a)(1)(i)]	☒	☐	☐	☐
b. The waste constituents that the treater will monitor, if monitoring will not include all regulated constituents? [268.7(a)(1)(ii)]	☒	☐	☐	☐
c. The manifest number associated with the shipment of waste? [268.7(a)(1)(iii)] and	☒	☐	☐	☐
d. Waste analysis data, where available? [268.7(a)(1)(v)]	☒	☐	☐	☐
30. For restricted wastes which the generator has determined can be land disposed without further treatment, has the generator accompanied each shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards and the applicable prohibitions set forth in 268.32 or RCRA section 3004(d)? 268.7(a)(2)	☐	☐	☒	☐
31. Did the notification include the following information:				
a. EPA Hazardous Waste Number? [268.7(a)(2)(i)(A)]	☐	☐	☒	☐
b. The waste constituents that the treater will monitor, if monitoring will not include all regulated constituents? [268.7 (a)(2)(i)(B)]	☐	☐	☒	☐
c. The manifest number associated with the shipment of waste? [268.7(a)(2)(i)(C)] And	☐	☐	☒	☐
d. Waste analysis date, where available? [268.7(a)(2)(i)(D)]	☐	☐	☒	☐
32. Was the certification signed by an authorized representative, and did it state the following: "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment." [268.7(a)(2)(ii)]	☐	☐	☒	☐
33. Has the generator received a case-by-case exemption on restricted waste, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions? [268.7(a)(3)]	☐	☐	☒	☐
34. Does the generator retain on-site copies of all notices, certifications, demonstrations, waste analysis data, and other documentation for at least three years from the date the waste was last sent to on-site or off-site treatment, storage or disposal? [268.7(a)(7)]	☒	☐	☐	☐
35. Is the generator storing land restricted waste? (For one year storage only)	☐	☒	☐	☐

REGULATION [40 CFR CITATION]	YES	NO	NA	NC
36. If yes, is the storage on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment or disposal?	☐	☐	☒	☐

COMMENTS:

DEQ staff conducted a walk through inspection of the facility and observed process operations, hazardous waste accumulation areas as well as universal waste storage areas. DEQ staff noted that hazardous waste was accumulated on-site in containers. For more details regarding hazardous waste container management at the facility, refer to the Container Management checklist of this report. For more information regarding universal waste storage refer to Universal Waste Checklist of this report.

During the inspection, DEQ staff reviewed hazardous waste management documentation including hazardous waste determination information and waste profile information. DEQ staff noted that the facility uses testing, Material Safety Data Sheets (MSDS), and generator knowledge of the waste generating process for determination.

DEQ staff reviewed hazardous waste manifest and LDR documentation for the prior three years and noted that the facility had copies of each manifest and the LDR notifications for the past three years with the all the information required in §262 Subpart B. The facility maintains copies of hazardous waste manifests and LDR notifications in hard copies at the facility. All hazardous waste manifests reviewed were noted to be signed by the transporter and the designated facility. The hazardous waste manifests reviewed indicated that the hazardous waste shipments had been received by the designated facility within 45 days from off-site shipment from the facility. Specific hazardous waste manifest documents reviewed during the compliance evaluation inspection include (but are not limited to):

007994811JJK, shipment date: April 26, 2012
001753668JJK, shipment date: July 19, 2011
007994036JJK, shipment date: July 18, 2011
007420066JJK, shipment date: January 13, 2011
007386978JJK, shipment date: December 13, 2010

It was noted that the facility did not generate any hazardous waste during calendar years 2013 and 2014. However, the facility did want to keep their LQG status due to the unknown timing for the renovation of buildings DC-2 and DC-3.

Health & Safety Checklist

Facility Name	Quality Investment Properties Richmond LLC	EPA ID NUMBER	VAR000007534
DEQ Representative(s)	Ryan Smith	Date	May 7, 2015

REGULATION [40 CFR CITATION]	YES	NO	NA	NC
SECTION A – Outline of Personnel Training Program (264/265.16(a) as referenced by 262.34(a)(4).				
1. Does the facility have a written training program?	☒	☐	☐	☐
2. Does the program consist of:				
a. strictly classroom instruction?	☒	☐	☐	☐
b. strictly on-the-job training?	☐	☒	☐	☐
c. classroom instruction AND on-the-job training?	☐	☒	☐	☐
3. Is an annual refresher course required for personnel whose positions at the facility are related to hazardous waste management? (264/5.16(c) as referenced by 262.34(a)(4)	☐	☒	☐	☒
SECTION B - JOB TITLE/JOB DESCRIPTION 264/265.16(d)(1)& (2) as referenced by 262.34 (a)(4)				
4. Is a job title provided for each employee whose position at the facility is related to hazardous waste management?	☒	☐	☐	☐
5. Is a job description provided for each employee whose position at the facility is related to hazardous waste management?	☒	☐	☐	☐
SECTION C - TRAINING DIRECTOR 264/265.16(a)(2) as referenced by 262.34 (a)(4)				
6. Is the training program directed by a person trained in hazardous waste management?	☒	☐	☐	☐
SECTION D - RELEVANCE OF TRAINING TO JOB POSITION 264/265.16(a)(2) as referenced by 262.34 (a)(4)				
7. Are facility personnel instructed in hazardous waste management procedures (including contingency plan implementation) relevant to their positions?	☒	☐	☐	☐
Section E - Training and Emergency Response 264/265.16(a)(3) as referenced by 262.34 (a)(4)				
8. Does the training program include the following emergency response procedures where applicable?				
a. Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment?	☒	☐	☐	☐
b. Key parameters for automatic waste feed cut-off systems?	☐	☐	☒	☐
c. Procedures for utilizing communications or alarm systems?	☒	☐	☐	☐
d. Directions for responding to fires or explosions?	☒	☐	☐	☐
e. Procedures for groundwater contamination response?	☐	☐	☒	☐
f. Procedures for conducting shutdown operations?	☒	☐	☐	☐

REGULATION [40 CFR CITATION]	YES	NO	NA	NC
SECTION F - IMPLEMENTATION OF TRAINING PROGRAM 264/265.16(b), (d)(4) as referenced by 262.34 (a)(4)				
9. Are all facility personnel trained within six months of their employment or assignment to the facility or transfer to a new position?	☒	☐	☐	☐
10. Are facility personnel allowed to work unsupervised before their training program has been completed?	☐	☒	☐	☐
11. Are records maintained which document that the required training has been given to and completed by facility personnel?	☒	☐	☐	☐
SECTION G - TESTING AND MAINTENANCE OF EQUIPMENT 264/265.33 as referenced by 262.34 (a)(4)				
12. Does the owner/operator test and maintain (as necessary to assure its proper operation in time of emergency) the following equipment:				
a. All communications or alarm systems?	☒	☐	☐	☐
b. Fire protection equipment?	☒	☐	☐	☐
c. Spill control equipment?	☒	☐	☐	☐
d. Decontamination equipment?	☒	☐	☐	☐
SECTION H - GENERAL INSPECTION REQUIREMENTS (PERMITTED FACILITIES ONLY) 264/265.15				
13. Does the owner/operator maintain a written schedule at the facility for the inspection of:	☐	☐	☒	☐
a. Monitoring equipment?	☐	☐	☒	☐
b. Safety and emergency equipment?	☐	☐	☒	☐
c. Security devices?	☐	☐	☒	☐
d. Operating and structural equipment?	☐	☐	☒	☐
e. Types of problems with equipment:	☐	☐	☒	☐
1. Malfunction	☐	☐	☒	☐
2. Operator error	☐	☐	☒	☐
3. Discharges	☐	☐	☒	☐
14. Does the schedule identify the types of problems to look for?	☐	☐	☒	☐
15. Is the frequency of inspection based on the possible deterioration of equipment and the probability of incident?	☐	☐	☒	☐
16. Are areas subject to spills, such as loading and unloading areas, inspected daily?	☐	☐	☒	☐
17. Does the owner/operator maintain an inspection log? If yes, does the log include:	☐	☐	☒	☐
a. Date and time of inspection?	☐	☐	☒	☐
b. Name of inspector?	☐	☐	☒	☐
c. Notations of observations?	☐	☐	☒	☐
d. Date and nature of repairs or remedial actions?	☐	☐	☒	☐

REGULATION [40 CFR CITATION]	YES	NO	NA	NC
18. Have any malfunctions or other problems not been remedied? (Summarize in comments section.)	☐	☐	☒	☐
SECTION I - REQUIRED AISLE SPACE 264/265.35 as referenced by 262.34 (a)(4)				
19. Does the facility maintain aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment?	☒	☐	☐	☐
20. If aisle space is not maintained, has the owner/operator demonstrated to the Regional Administrator that the space is not needed?	☐	☐	☒	☐
SECTION J - EQUIPMENT REQUIREMENTS 264/265.32 as referenced by 262.34 (a)(4)				
21. Is there evidence of fire, explosion, or contamination of the environment? If yes, explain in the comment section.	☐	☒	☐	☐
22. Is the facility equipped with the following:				
a. An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel?	☒	☐	☐	☐
b. A device such as a telephone (immediately available) or handheld two-way radio capable of summoning emergency assistance from police, fire, or state or local emergency response teams?	☒	☐	☐	☐
c. Portable fire extinguishers?	☒	☐	☐	☐
d. Fire control equipment (including special extinguishing equipment such as foam, inert gas, or dry chemical)?	☒	☐	☐	☐
e. Spill control equipment?	☒	☐	☐	☐
f. Decontamination equipment?	☒	☐	☐	☐
g. Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems?	☐	☐	☒	☐
SECTION K - REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTES 264/265.17(a) and (b) (PERMITTED FACILITIES ONLY)				
23. Does the facility handle ignitable or reactive waste? If yes:	☐	☐	☒	☐
a. Does the owner/operator take the following precautions to prevent accidental ignition or reaction of wastes: Separate and protect ignitable or reactive wastes from sources of ignition or reaction (open flames, smoking, cutting, welding, hot surfaces, frictional heat, static electrical or mechanical sparks, spontaneous ignition, and radiant heat?	☐	☐	☒	☐
24. Does the owner/operator confine smoking and open flames to specially designated locations, while ignitable or reactive waste is being handled?	☐	☐	☒	☐
25. Are "No Smoking" signs placed conspicuously wherever there is a hazard from ignitable or reactive waste?	☐	☐	☒	☐
26. Does the owner/operator have procedures in place to prevent accidental ignition or reaction of wastes?	☐	☐	☒	☐
SECTION L - CONTINGENCY PLAN 264/265.50 through §265.56 as referenced by 262.34 (a)(4)				
27. Does the owner/operator have a Contingency Plan, or a Spill Prevention Control and Counter measures (SPCC) Plan, or some other emergency plan, that is amended for hazardous waste management?	☒	☐	☐	☐

REGULATION [40 CFR CITATION]	YES	NO	NA	NC
28. Is a copy maintained at the facility?	☒	☐	☐	☐
29. Has a copy been submitted to all local police and fire departments, hospitals, and State and local emergency response teams?	☐	☒	☐	☒
30. Does the plan describe the control procedures taken in the event of a fire, explosion, or release?	☒	☐	☐	☐
31. Does the plan describe how and when it will be implemented?	☒	☐	☐	☐
32. Does the plan describe arrangements agreed to by local police and fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services?	☒	☐	☐	☐
33. Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	☐	☒	☐	☒
34. Is one person named as the primary coordinator?	☒	☐	☐	☐
35. Does the coordinator have the authority to commit the resources to carry out the emergency plan?	☒	☐	☐	☐
36. Does the plan physically describe and identify the location of all emergency equipment at the facility?	☐	☒	☐	☒
37. Does the plan include provisions to ensure that the equipment is cleaned and fit for its intended use before operations are resumed?	☐	☒	☐	☒
38. Does the plan include an evacuation plan for facility personnel?	☒	☐	☐	☐
39. Does the plan describe:				
a. Signal(s) to be used to begin evacuation?	☒	☐	☐	☐
b. Evacuation routes?	☒	☐	☐	☐
c. Does the plan describe the methodology for immediate notification of:	☒	☐	☐	☐
1. Facility personnel?	☒	☐	☐	☐
2. State or local agencies with designated response roles?	☒	☐	☐	☐
40. Does the plan include procedures for identification of released materials?	☒	☐	☐	☐
41. Does the plan include procedures/criteria to assess possible hazards to human health and the environment that may result from the release, fire, or explosion?	☒	☐	☐	☐
42. Does the plan describe all reasonable measures necessary to ensure that fires, explosions, or releases do not occur, reoccur, or spread to other hazardous waste at the facility?	☒	☐	☐	☐
43. Does the plan describe procedures to monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment if the facility stops operation in response to a fire, explosion, or release?	☐	☐	☒	☐
SECTION M - NECESSARY AGREEMENTS WITH LOCAL AUTHORITIES 264/265.37 as referenced by 262.34 (a)(4)				
44. Has the owner/operator made the following arrangements:				

REGULATION [40 CFR CITATION]	YES	NO	NA	NC
a. Familiarized police, fire departments, and emergency response teams with the layout of the facility and associated hazards?	☒	☐	☐	☐
b. Designated one police and fire department with primary emergency authority when more than one might respond?	☒	☐	☐	☐
c. Agreements with State emergency response teams, contracts, and equipment supplies?	☒	☐	☐	☐
d. Familiarized local hospitals with the properties of waste handled at the facility and the types of injuries or illness that could result?	☐	☒	☐	☒
45. Where authorities decline to enter into such arrangements, has the owner/operator documented the refusal?	☐	☐	☒	☐

COMMENTS:

During the inspection, DEQ observed the emergency response equipment including fire and spill response materials and reviewed the facility training program, personnel training records, the equipment inspection and maintenance logs as well as the facility's Oil Discharge Contingency Plan (contingency plan). DEQ staff observed portable fire extinguishers, spill control kits, and decontamination equipment including eye wash stations and safety showers. All fire extinguishers, eye wash, safety showers, and the spill control equipment are checked monthly by the facility.

The facility contracted TPC Training Systems to maintain a training schedule that details each employee and what training is required. TPC will also send out notifications when training is required and monthly general awareness training. All staff members handling hazardous waste are trained initially in hazardous waste management and all employees are trained initially on the contingency plan. This training is given by Mr. William Fowler who most recently received Hazmat Tech 8-Hour Refresher training from Marshall Miller and Associates on March 9, 2010. Upon reviewing the training records, the facility was unable to provide documentation that the facility conducts an annual training for personnel whose positions at the facility are related to hazardous waste management.

The facility's contingency plan, last revised February 2013, was reviewed and appeared to have some deficiencies with the applicable requirements pursuant to 40 CFR 265 Subpart D. The named facility primary emergency response coordinator is Mr. William Fowler, along with the several secondary emergency response coordinators listed. The home, work, and mobile phone numbers for each emergency coordinator are listed. However, the plan does not list the home addresses in accordance with§265.52(d). It appears the contingency plan does not contain a list/location of all of the emergency response equipment including fire extinguishers, spill kits, and the locations of the eye wash stations and safety showers in accordance with §265.52(e). Additionally, the plan did not include provisions to ensure that the equipment is cleaned and fit for its intended use before operations and resumed in accordance with §265.56(h)(2).

At the time of the inspection, the facility could not provide documentation that the Contingency Plan was submitted to all local police and fire departments, hospitals, and State and local emergency response teams. Additionally, the facility was unable to provide documentation that the local hospitals have been notified with the properties of waste handled at the facility and the types of injuries or illness that could result.

Hazardous Waste
Container Management Checklist
40 CFR Part 262 and References

Facility Name	Quality Investment Properties Richmond LLC	EPA ID Number	VAR000007534
DEQ Representative(s)	Ryan Smith	Date	May 7, 2015

NOTE: Regulatory citations herein for Large Quantity Generators (<1000 kg) are as referenced by 40 CFR 262.34(a)(1)(i). Regulatory citations herein for Small Quantity Generators (100 kg – 1000 kg) are as referenced by 40 CFR 262.34 (d).

1 ACCUMULATION AREAS

(a) List each container accumulation area. Specify the number, volume, and/or quantity/weight of each container type. [NOTE: Include any satellite accumulation areas and verify compliance with satellite accumulation requirements. Provide comments if observations indicate non-compliance.]

LOCATION	NUMBER / SIZE OF CONTAINERS/TANKS	CONTENTS
Central Accumulation Area		
Inside IWT	(1) 55-gallon steel drum	Sump Solvent and Rinsate
	(4) 55-gallon steel drums	Sump Solvent
	(4) 55-gallon steel drums	Sump Rinsate
	(4) 55-gallon steel drums	Tank Sludge
	(1) 55-gallon polyethylene drum	Sump Solvent and Rinsate
Outside IWT	(11) 250-gallon polyethylene totes	Spent Sodium Hydroxide and Rinsate
DC-3	(3) 1-cubic yard fiberboard box	Universal Waste Lamps
	(1) 1/3- cubic yard plastic container	Universal Waste Lamps

	Yes	No	NA	NC
(b) Has the generator or TSD facility notified the Department of the exact location of his accumulation areas (NOTE: Satellite areas are excluded) prior to or upon establishment of the areas? (9 VAC 20-60-262 B.4.) (Note: previous inspection reports indicating existing and continued use, but not newly established, areas may qualify as adequate notification)		X		X

2 CONTAINERS	Yes	No	NA	NC
(a) Are containers in good condition? (265.171)	X			
(b) Is the container made of a material that will not react with the waste it stores? (265.172)	X			
(c) Is the container kept closed while hazardous waste is in accumulation? (265.173)	X			
(d) Is the container never opened, handled, or stored in a manner which may rupture it or cause it to leak? (265.173)	X			
(e) Does the owner/operator inspect containers at least weekly for leaks and deterioration? (265.174)			X	
(f) Are containers holding ignitable and reactive waste located at least 15 m (50 ft) from facility property lines? (265.176) [LQGs or TSDs only]			X	
(g) Are incompatible wastes or materials placed in the same containers? (265.177)		X		
(h) Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste? (265.177)			X	
(i) Are incompatible hazardous wastes separated from each other by a berm, dike, wall, or other device? (265.177)			X	

3 Part 264 / Part 265 - SUBPART CC [This section applies to LQGs and TSDs. SQGs are exempt per 262.34(d)]

Subpart CC applies to containers holding HW with an average volatile organics concentration >500 ppmw.	
Level One	Containers >26.4 gal <= 119 gal, meet DOT standards, use cover and closure device with no gaps, or use vapor suppressing barrier.
Level Two	Containers > 122 gal and in light liquid service, meet DOT specifications, no detectable emissions, demonstrated to be vapor tight within last 12 months.
Level Three	Container can be used for waste treatment by stabilization, vent vapors from containers and remove or destroy in control device, put in an enclosure and vent vapors and destroy them in a control device.

	Yes	No	NA	NC
(a) Does the facility claim that the subpart CC regulations are not applicable to their waste management unit(s) or that the unit(s) are excepted or exempted from regulation (265.1080(b), 265.1083(c), or 265.1)? Explain in the comments section. (265.1080)		X		
(b) If the waste management unit(s) are exempt because the volatile organic compound (VOC) concentration of the waste is <500 ppmw, does the facility have VOC determination records? (265.1084)			X	
(c) What level of emission control is the facility using to comply with Subpart CC container requirements? **Level One**				

4 **<u>For PERMITTED OR UNPERMITTED TSDFS only</u>**

	Yes	No	NA	NC
(a) Do container storage areas have a containment system? (264.175)			X	
(b) At closure, were all hazardous wastes and associated residues removed from the containment system? (264.178)			X	

COMMENTS:

Inside the IWT Building, DEQ staff observed (1) 55-gallon steel drum labeled “Hazardous Waste”, (4) 55-gallon steel drums labeled “Sump Solvent”, (4) 55-gallon steel drums labeled “Sump Rinsate”, (4) 55-gallon steel drums labeled “Tank Sludge”, and (1) 55-gallon polyethylene drum that was un labeled. At the time of the inspection it was stated that the drum labeled “Hazardous Waste”, was not suspected to be hazardous waste and that the label was inadvertently left on the container. Additionally, it was stated that the other (13) drums were not suspected to be hazardous waste but the facility needed to check with Cardno to be certain.

On June 9, 2015, the facility stated that these drums were found to contain solvent waste from cleaning out old infrastructure and some contained the reinstate from the cleaning. They also stated that all of these drums are schedule to be shipped for disposal this week. The drums that were unlabeled were inspected and found to be empty or containing water. According to the facility, these have been removed.

Outside the IWT Building, DEQ staff observed (11) 250-gallon polyethylene totes. At the time of the inspection it was stated that the totes contain spent sodium hydroxide solution and rinsate from the demolition activities associated with the removal of the sodium hydroxide tank. Additionally, it was stated that the (11) totes were currently being evaluated to make a hazardous waste determination and the facility needed to check with Cardno to be certain. It was also stated that this waste was generated on May 1, 2015.

On June 9, 2015, the facility submitted waste profile information indicating that the waste in the totes is hazardous for corrosivity (D002). The facility also indicated that the these totes have shipped off-site for transportation and disposal.

Hazardous Waste
Universal Waste Management Checklist
40 CFR 273 and 9 VAC 20-60-273

Facility Name	Quality Investment Properties Richmond LLC	EPA ID Number	VAR000007534
DEQ Representative(s)	Ryan Smith	Date	May 7, 2015

1 40 CFR 273 – Subpart A

As observed during this inspection, the facility manages the following as universal wastes:

____ batteries as described in 273.2 and 273.9
____ pesticides as described in 273.3 and 273.9
____ mercury containing equipment as described in 273.4 and 273.9
_X_ lamps as described in 273.5 and 273.9

2 UNIVERSAL WASTE HANDLER

(a) For the purpose of this inspection, the facility is being evaluated as a:

_X_ Small Quantity Handler of Universal Waste (Part 273 – subpart B)
____ Large Quantity Handler of Universal Waste (Part 273 – subpart C)

NOTE: A Small Quantity Handler of Universal Waste may not accumulate more than 5,000 kg (total) universal waste at any time. A Large Quantity Handler of Universal Waste is one that accumulates >5,000 kg (total) universal waste at any time.

	Yes	No	NA	NC
(b) If the facility is a Large Quantity Handler of Universal Waste, has the facility provided notification of universal waste management activities by submitting a EPA Form 8700-12 as required by 273.32?			X	

3 Batteries – 273.13 (a) and 273.33(a)

(a) Releases of universal waste:	Yes	No	NA	NC
Does the facility maintain UW batteries in a container if they show evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions?			X	
Is the container closed, structurally sound, and compatible with the universal waste being stored?			X	
(b) Does the facility remove electrolyte from the battery? If yes, has the facility made a hazardous waste determination for the electrolyte and managed it appropriately (specify)?			X	

4 Pesticides - 273.13 (b) and 273.33(b)	Yes	No	NA	NC
(a) Does the facility manage UW pesticides in a way that prevents leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions?			X	

(b) Does the facility manage universal waste pesticides in one or more of the following containers (check all that are applicable):

____ A container that remains closed, structurally sound, and compatible with the pesticide, and that lacks evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions? or

____ A container that does not meet the requirements but that is overpacked in a container that does meet the requirements? or

____ A tank that meets the requirements of 40 CFR 265 subpart J, except for 265.197 (c), 265.200, and 265.201? or

____ A transport vehicle or vessel that is closed, structurally sound, and compatible with the pesticide, and that lacks evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions?

5	Mercury Containing Equipment (MCE) - 273.13 (c) and 273.33(c)	Yes	No	NA	NC
	(a) Does the facility manage UW MCE in a way that prevents leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions?			X	
	(b) Does the facility manage UW MCE in a container that remains closed, structurally sound, and compatible with the UW MCE, and that lacks evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions?			X	
	(c) Does the facility remove mercury-containing ampules from UW MCE?			X	
	(d) If yes, does the facility meet the requirements of 273.13(c)(2) or 273.33(c)(2) for removing the mercury-containing ampules?			X	
	(e) For any clean-up residues from removing mercury-containing ampules, has the facility made a hazardous waste determination?			X	

6	Lamps - 273.13 (d) and 273.33(d), and 9 VAC 20-60-273 B.3.	Yes	No	NA	NC
	(a) Does the facility manage UW lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents?	X			
	(b) Do containers remain closed and lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions?		X		X
	(c) Is there evidence of broken lamps?		X		
	(d) Does the facility immediately clean up and place in a container any lamp that is broken?			X	
	(e) Does the generator crush mercury-containing lamps on-site?		X		
	(f) If yes, are the lamps crushed in a mechanical unit specifically designed for such use?			X	
	(1) Is the unit used indoors?			X	
	(2) Is the crusher unit operated to minimize release of mercury to the workplace and the environment in compliance with 29 CFR 1910.1000?			X	
	(3) Does the facility have documentation from the crusher's manufacturer that shows that the unit: • Is capable of achieving the OSHA PEL for mercury of 0.10 mg/m^3 in indoor ambient air?			X	
	• Achieves a particle retention rate of 99.97% in the HEPA filter (at a particle diameter of 0.3 microns)?			X	
	(4) Does the facility have a documented procedure for the operation of the lamp crusher?			X	
	(5) Is an equipment maintenance log maintained at the facility?			X	
	(6) Have the facility's operators been provided training specific to the lamp crushing unit in use?			X	
	(7) Does the facility have documentation of training of their unit operators?			X	
	(8) Is the lamp crusher equipped with containment and filtration to remove mercury-containing vapors and dusts from process air flow?			X	
	(9) Is the drum containing the crushed bulbs closed, not leaking, and in good condition?			X	
	(10) Does the facility transfer crushed lamps from one drum to another?			X	
	(11) For residue, filter media, or other solid waste generated from crushing operations not being reclaimed, has the generator made a hazardous waste determination and managed it accordingly?			X	

7	Labeling and marking – 273.14 and 273.34	Yes	No	NA	NC
	Does the facility label the UW or UW containers/tanks with one of the following: "Universal Waste – (insert type)" or "Waste (insert type)," or "Used (insert type)"?		X		X

8	Accumulation time limits– 273.15 and 273.35	Yes	No	NA	NC
	(a) Does the facility accumulate UW for more than one year?		X		
	(b) If yes, has the facility demonstrated the need to accumulate UW for more than one year to accumulate quantities necessary to facilitate proper recovery, treatment, or disposal?			X	
	(c) Does the facility demonstrate the length of time the UW has been accumulated from the date it becomes a waste or is received from off site by methods under 273.15 (c) or 273.35 (c)?		X		X

9	Employee Training – 273.16 and 273.36	Yes	No	NA	NC
	(a) For SQHs, has the facility informed all employees who handle/have responsibility for handling UW? (The information must describe proper handling and emergency procedures specific to the types of UW the facility handles at the facility.)	X			
	(b) For LQHs, has the facility ensured that all employees are thoroughly familiar with proper waste handling and emergency procedures relative to their responsibilities during normal facility operations and emergencies?			X	

10	Response to Releases – 273.17 and 273.37	Yes	No	NA	NC
	(a) Does the facility contain a release of UW or residue from UW immediately?			X	
	(b) Does the facility make a HW determination on the released and/or residual material?			X	

11	Off-site shipments – 273.18 and 273.38	Yes	No	NA	NC
	(a) Does the facility ship universal waste to another universal waste handler?		X		
	(b) Does the facility ship universal waste to a destination facility?		X		
	(c) Does the facility ship universal waste to a destination facility that recycles it without storing it?	X			
	(d) Does the facility ship universal waste to a foreign destination?		X		
	(e) Does the facility self transport universal waste?		X		
	(f) If yes, has the facility notified if also a LQHUW?			X	

12	Tracking universal waste shipments – LQHUW – 273.39	Yes	No	NA	NC
	(a) Does the LQHUW keep a record of each shipment of universal waste received at the facility? (Record must include name, address, quantity and type of UW, and date)			X	
	(b) Does the LQHUW keep a record of each shipment of universal waste sent off site? (Record must include name, address, quantity and type of UW, and date)			X	
	(c) Does the LQHUW maintain shipping records for at least three years?			X	

13 UNIVERSAL WASTE TRANSPORTERS – 40 CFR 273 Subpart D	Yes	No	NA	NC
(a) Does the facility transport universal waste?			X	
(b) Does the transporter dispose of, dilute or treat universal waste?			X	
(c) Does the transporter comply with applicable U.S. DOT requirements?			X	
(d) Does the transporter store the universal waste at a transfer facility for more than ten days?			X	
(e) Does the transporter contain a release of UW or residue from UW immediately? Does the transporter make a HW determination on the released and/or residual material?			X	

14 UNIVERSAL WASTE DESTINATION FACILITIES – 40 CFR 273 Subpart E	Yes	No	NA	NC
(a) Does the facility receive universal waste for treatment, disposal or recycling?			X	
(b) Does the facility comply with applicable requirements of 40 CFR 264, 265, 266, 268, 270, and 124?			X	
(c) Does the facility recycle universal waste without storing it? (If so, how is this accomplished? Can they demonstrate a market for the recyclables? 40 CFR 261.6(f))			X	
(d) If so, does the facility comply with 40 CFR 261.6(c)(2)? (261.6(c)(2) - the facility has an EPA ID number and complies with the air emissions requirements in 40 CFR 264 or 265)			X	
(e) Does the facility have an EPA ID number?			X	
(f) Does the facility keep a record of each shipment of universal waste received at the facility? (Record must include name, address, quantity and type of UW, and date)			X	
(g) Does the facility maintain records for at least three years?			X	
(h) Does the facility send UW they receive to a UW handler, another destination facility, or export it?			X	
(i) Has the facility had to reject a shipment of UW?			X	
If yes, did the facility contact the shipper and discuss reshipment of the load properly – back to the shipper or to another destination facility?			X	
(j) Has the facility received a shipment of HW that was not UW?			X	
If yes, did the facility contact the DEQ with the shipper's name, address, and phone number properly?			X	

COMMENTS:

At the time of the inspection the facility had one accumulation area for universal waste lamps located in DC-3. At the accumulation area, DEQ staff observed (3) cubic yard fiberboard boxes and (1) 1/3 cubic yard container containing universal waste lamps. At the time of the inspection the (4) containers of universal waste lamps were not closed and were not labeled "Universal Waste – Lamps", "Waste Lamps", or "Used Lamps". Additionally, the facility was unable to demonstrate the length of time that the universal waste has been accumulated from the date it became a waste. Upon reviewing manifest, it was noted that the facility disposed of universal waste lamps at AERC Recycling Solutions on January 27, 2012, and May 4, 2011.

Virginia Department of Environmental Quality
Hazardous Waste Program
Aerosol Can Management

April 21, 2015

Purpose

The purpose of this document is to provide compliance assistance to Virginia facilities that generate discarded aerosol cans and information on how those discarded aerosol cans may be managed to meet the requirements of the Virginia Hazardous Waste Management Regulations. The information in this document does not apply to persons generating household hazardous waste as defined in 40 CFR 261.4(b)(1).

A flow diagram, which summarizes the decision points and applicable requirements, has been provided at the end of this document.

This information is provided for compliance assistance purposes only by the Virginia Department of Environmental Quality (DEQ). This is not a regulation and, therefore, does not add, eliminate, or change any existing regulatory requirements. The statements in this document are intended for informational purposes only.

Discussion

Discarded aerosol cans may contain unused product and excess propellant. As a result, discarded aerosol cans may be regulated as a hazardous waste due to the following:

- The chemical product that was contained within the can;
- The compressed gas used as the propellant; and/or
- The can itself (e.g., potential to be reactive).

An intact, discarded aerosol can is considered a hazardous waste if:

- The can contains a U-listed chemical and/or;
- The can contains a P-listed chemical or the residue of a P-listed chemical, and/or;
- The product, propellant or the can itself exhibits one or more of the characteristics of hazardous waste as defined in Subpart C of 40 CFR 261.

Aerosol cans are considered "RCRA Empty" (40 CFR 261.7) when:

- The product has been expelled from the can and only residue remains and/or any liquids remaining in the can have been otherwise removed (Note: this does not apply to cans that previously held P-listed chemicals); and

- The pressure in the can approaches atmospheric pressure.

How to meet the RCRA Empty standard:

In order to meet the requirements above, the conditions below must be met with the second condition being met in all cases.

- A can is empty when the product has been completely sprayed out as a result of normal use and minimal or no product remains in the can. (Note: Do not deliberately spray out contents to empty the can. Use the product only for the intended purpose.)
  AND/OR
- An aerosol can puncturing device has been used to remove any remaining liquids from the can and/or to depressurize the can. It is recommended that the device:
  - Be designed for the purpose of puncturing aerosol cans and be capable of capturing both liquids and gases that may be released;
  - Be operated according to the manufacturer's specifications; and
  - Be secured on a container that meets all of the container management requirements of 40 CFR 262.34(a), (c) or (d), as applicable.

Accumulating Discarded Aerosol Cans

Unless the discarded aerosol cans have been evaluated and sufficient documentation is available to demonstrate that they are non-hazardous or RCRA empty, it is assumed that discarded aerosol cans are a hazardous waste.

For LQGs and SQGs hazardous waste aerosols must be accumulated in a closed container marked or labeled with:

- The words "Hazardous Waste"; and
- The accumulation start date.

LQGs and SQGs must also inspect containers at least weekly and keep them closed except when adding or removing waste.

Refer to 40 CFR 262.34 for complete requirements that apply to large and small quantity generators.

Satellite Accumulation

Hazardous Waste aerosol cans may also be accumulated in compliance with the satellite accumulation rules. Under these rules, up to 55-gallons (non- P-listed wastes) may be accumulated at to near the point of generation or 1 quart of P-listed hazardous wastes). The satellite accumulation provisions may be found at 40 CFR 262.34(c)(1).

For further facility-specific assistance with proper management of aerosol cans under the VHWMR including satellite accumulation provisions, please contact the appropriate DEQ Regional Office.

Management of aerosol cans after meeting "RCRA empty" Requirements

Once the aerosol can is RCRA empty it may be recycled or disposed of as solid waste. This does not apply to an aerosol can that held P-listed chemicals; these aerosol cans must be disposed as hazardous waste.

Management of Aerosol Can Contents after Puncturing

After puncturing, the liquid contents drain to a container. Generators should ensure that chemicals drained into the same collection container are compatible with one another. In addition, generators must make a hazardous waste determination for any liquids or gases removed from the cans and manage these wastes accordingly, either as hazardous waste or solid waste.

Filters

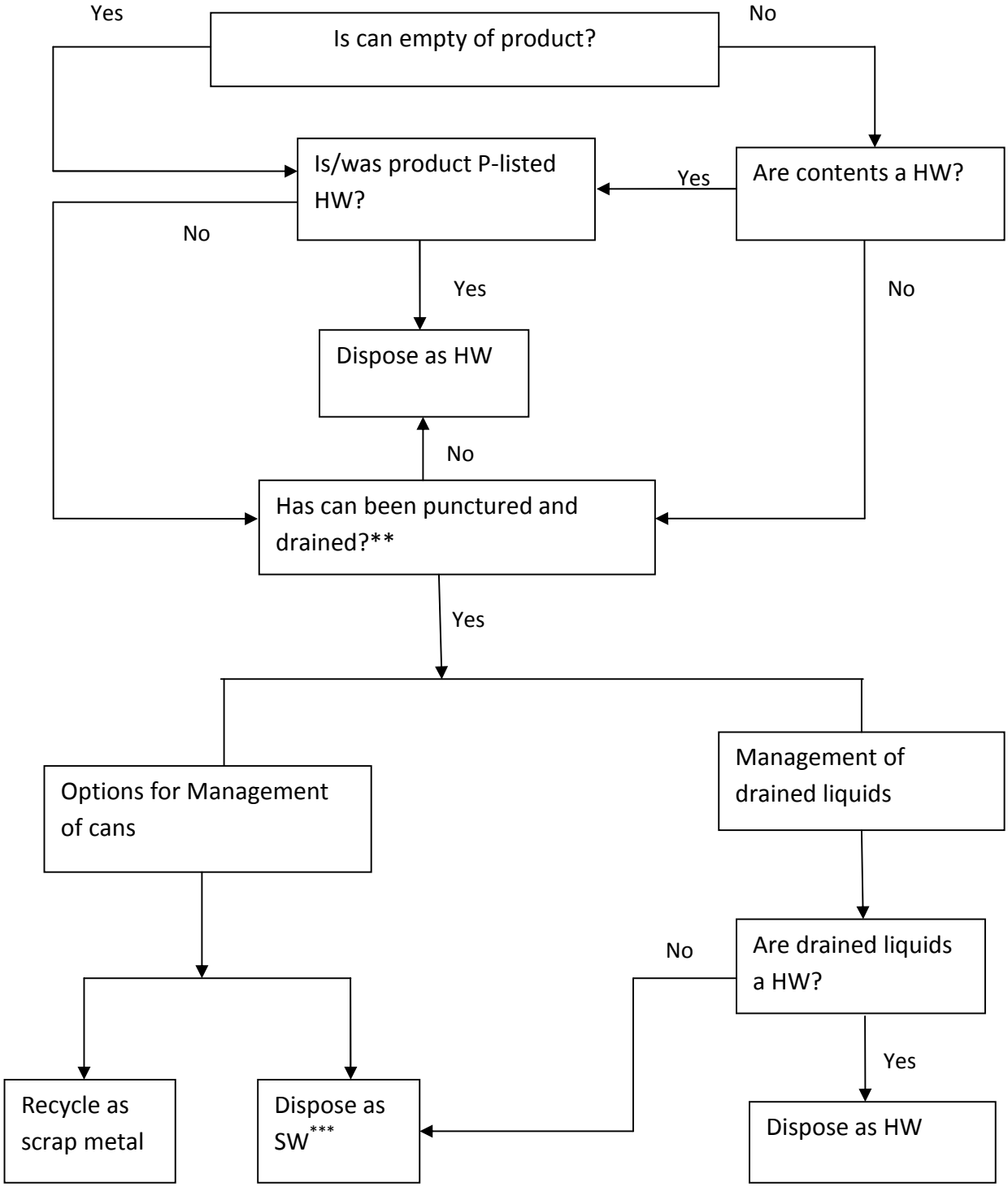
Most aerosol cans are pressurized with either flammable gases such as propane or isobutene, or with non-flammable gases such as carbon dioxide. Most commercially available equipment for aerosol can puncturing vent these gases through a coalescing/activated carbon filter. When disposed, these filters may be a characteristic or listed hazardous waste. As a result, generators must make a hazardous waste determination for the filters and dispose of them accordingly.

For More Information

Please contact the appropriate DEQ regional staff if you have any questions regarding applicability of these requirements to your facility.

Virginia Department of Environmental Quality
Hazardous Waste Program
Aerosol Can Management

April 21, 2015



** Device used for puncturing must be designed for puncturing aerosol cans that captures both liquids and gases that may be released and must be operated in accordance with manufacturer's specifications.

*** Note: Solid waste landfills cannot accept free liquids. Please check with the landfill on acceptance criteria.

Attachment 1

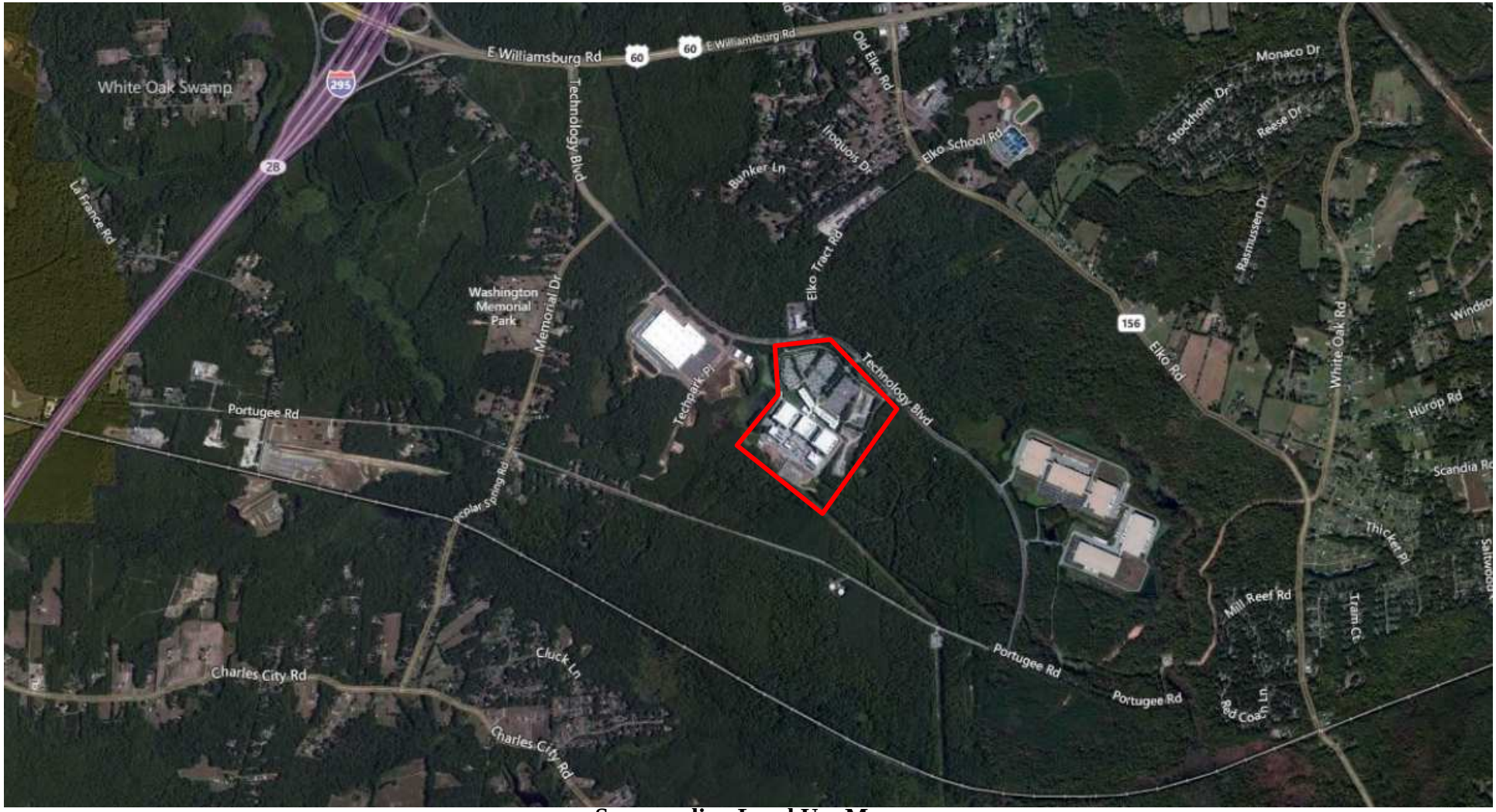
Surrounding Land Use Map

May 7, 2015

Piedmont Regional Office
Ryan Smith

Quality Investment Properties
Richmond, LLC.

EPA ID No. VAR000007534



Surrounding Land Use Map

Quality Investment Properties Richmond, LLC
6000 Technology Boulevard, Sandston, VA 23150

Hazardous Waste Compliance Evaluation Inspection
DEQ Piedmont Regional Office
Land Protection & Revitalization

Attachment 2

Facility Submitted Information

May 7, 2015

Piedmont Regional Office
Ryan Smith

Quality Investment Properties
Richmond, LLC.

EPA ID No. VAR000007534

Certificate of Completion

This certificate is hereby awarded to:

William Fowler

to certify successful completion of the:

MM&LA Hazmat Tech 8-Hr Refresher

Per OSHA 29 CFR 1910.120

Awarded: March 9, 2010

MARSHALL MILLER & ASSOCIATES

Tom Willis

From:	William Fowler
Sent:	Wednesday, March 17, 2010 8:13 AM
To:	Tom Willis
Cc:	Vince Alaimo
Subject:	FW:
Attachments:	20100317073716822.pdf

Tom:

Here are my training certificates for 40-Hour Hazmat Tech, confined space rescue and Humboldt training. Let me know if you have any questions. Thanks.

William Fowler
Emergency Response Coordinator
Marshall Miller & Assoc.
10988 Richardson Road
Ashland, VA 23005
W: (804) 496-5816
C: (804) 370-0711
www.mma1.com

-----Original Message-----
From: richmond.scanner@mma1.com [mailto:richmond.scanner@mma1.com]
Sent: Wednesday, March 17, 2010 7:37 AM
To: William Fowler
Subject:

This E-mail was sent from "RNPE5C126" (Aficio MP C6000).

Scan Date: 03.17.2010 07:37:16 (-0400)
Queries to: richmond.scanner@mma1.com

This communication contains information which is confidential and may also be privileged. It is for the exclusive use of the intended recipient(s). If you are not the intended recipient(s), please note that any distribution, copying or use of this communication or the information in it is strictly prohibited. If you have received this communication in error, please notify the sender immediately and then destroy any copies of it.

Infineon Technologies

Richmond, Virginia

Certificate of Completion

is hereby granted to:

William Fowler

to certify that they have completed to satisfaction

32 Hour Confined Space Rescue

Granted: February 28, 2002

Rescue Team

Dennis Slade, ESIH Manager

Medical College of Virginia
Virginia Commonwealth University

Department of Preventive Medicine
and the
Program in Industrial Hygiene/Occupational and Environmental Health

HEREBY AWARD THIS

Certificate of Completion

TO

WILLIAM FOWLER

for successful completion of the course

Hazardous Waste Safety and Health Program

R. Leonard Vance
R. Leonard Vance, Ph.D., CIH — Professor

August 6, 1999
Date

Jack Q. Lanie
Chairman, Department of Preventive Medicine

VIRGINIA COMMONWEALTH UNIVERSITY
Department of Preventive Medicine and Community Health
P. O. Box 980212
Richmond, Virginia 23298-0212
(804) 828-4548 Fax. (804) 828-4549

Date: August 6, 1999

Virginia Commonwealth University

PREVENTIVE MEDICINE AND COMMUNITY HEALTH

GRANT HOUSE
1008 EAST CLAY STREET
P.O. BOX 980212
RICHMOND, VIRGINIA 23298-0212

804 828-9785
FAX: 804 828-9773
TDD: 1-800 828-1120

COURSE TITLE: 40 - Hour Hazardous Waste Operations and Emergency Response

COURSE DATE: August 2-6, 1999

COURSE LOCATION: White Oak Semiconductor Plant

WILLIAM FOWLER

CONFIRMATION OF COMPLETION

This letter is written to confirm that the student named has completed the 40-Hour Hazardous Waste Operations and Emergency Response training, as required by 29 CFR 1910.120 for persons whose workplace activities are covered by the OSHA standard.

R. Leonard Vance, Ph.D., P.E., CIH
Associate Professor, DPMCH
Primary Instructor
Environmental Training Courses

Tammy E. Butler
Program Coordinator, DPMCH
Environmental Training Courses

An Equal Opportunity/Affirmative Action University

Certificate of Completion

ONSITE 49CFR/IATA TRAINING FOR INFINEON TECHNOLOGIES

This is to certify that

William Fowler

has been successfully trained and tested in the transportation of Dangerous Goods in accordance with the requirements of the International Civil Aviation Organization (ICAO) and the U.S. Department of Transportation, Title 49 CFR.
This certificate is valid for 12 months for domestic air carrier personnel; 24 months for ICAO and three years for U.S. DOT.

DGI Training Center
Dangerous Goods International

To verify training records, contact DGI Training Center,
1060 El Camino Real, Suite B, Redwood City CA 94063
Telephone: 650-306-8450
www.dgitraining.com

IATA
DANGEROUS GOODS ACCREDITED SCHOOL

Seminar Completion Date: *April 19, 2002*
Location: *Sandston, VA*
Instructors Name: *Jerry Green*
Program Director: *Candy L. Cook*

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LITHO. IN U.S.A.

HUMBOLDT

HUMBOLDT SCIENTIFIC, INC.

Nuclear Gauge Training Certification

William H. Fowler

HAS SUCCESSFULLY COMPLETED A CERTIFIED COURSE ON RADIATION SAFETY, TRANSPORT AND OPERATION OF INSTRUMENTS USING GAMMA AND NEUTRON RADIATION TO MEASURE THE PHYSICAL PROPERTIES OF CONSTRUCTION MATERIALS

Subjects included were:
Types and basic unit of ionizing radiation.
Calculations related to radiation safety.
Biological effects of radiation.
Methods of protection.
Leak testing procedures.
Procedures for safe transport (HAZMAT) and storage.
Security Awareness
Federal and State Regulations.
Accident prevention and procedures.
Instrument theory and operation.
Limitations of field maintenance.
Instrument standardization and calibration.
Test site selection and preparation.
Field operation and calculations.
Types and reasons for measurement errors.

Date of Training: **February 2, 2009**
Location: **Richmond, VA**
Certificate Number: **8211**
HAZMAT Expiration Date: **February 2, 2012**

Instructor: Keith Earnshaw
Humboldt Scientific, Inc.
551 -D Pylon Drive
Raleigh, NC 27606

REPUBLIC SERVICES **SPECIAL WASTE PROFILE**

Requested Disposal Facility: 5085 Old Dominion LF VA

Waste Profile #
Sales Rep #:

Saveable fill-in form. Restricted printing until all required (yellow) fields are completed.

I. Generator Information

Generator Name: Quality Investment Properties, LLC.			
Generator Site Address: 6000 Technology Blvd			
City: Richmond	County:	State: Virginia	Zip: 23150
State ID/Reg No:	State Approval/Waste Code: (if applicable)		NAICS # :
Generator Mailing Address (if different): ☐ 6000 Technology Blvd			
City: Richmond	County:	State: Virginia	Zip: 23150
Generator Contact Name: William Fowler		Email:	
Phone Number: (804) 952-8421	Ext:	Fax Number:	

II. Billing Information

Bill To: Potomac Environmental		Contact Name: Tom Kalil	
Billing Address: PO Box 1836		Email: tkalil@potomacenv.com	
City: Richmond	State: VA	Zip: 22555	Phone: (540) 659-1894

III. Waste Stream Information

Name of Waste: Lime sludge and fiberglass debris

Process Generating Waste: Cleaning and demolition of fiberglass lime tank
Off-spec lime slurry/sludge solids-unused product - NO FREE LIQUIDS
Pieces of fiberglass tank

Type of Waste:	☐ INDUSTRIAL PROCESS WASTE ☑ POLLUTION CONTROL WASTE
Physical State:	☑ SOLID ☑ SEMI-SOLID ☐ POWDER ☐ LIQUID
Method of Shipment:	☑ BULK ☐ DRUM ☐ BAGGED ☐ OTHER:
Estimated Annual Volume:	45 Tons
Frequency:	☑ ONE TIME ☐ ONGOING
Disposal Consideration:	☑ LANDFILL ☐ SOLIDIFICATION ☐ BIOREMEDIATION

IV. Representative Sample Certification

☑ NO SAMPLE TAKEN

Is the representative sample collected to prepare this profile and laboratory analysis, collected in accordance with U.S. EPA 40 CFR 261.20(c) guidelines or equivalent rules?	☐ YES or ☐ NO
Type of Sample: ☐ COMPOSITE SAMPLE ☐ GRAB SAMPLE	
Sample Date:	
Sample ID Numbers:	

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REPUBLIC SERVICES **SPECIAL WASTE PROFILE**

Waste Profile #

V. Physical Characteristics of Waste

Characteristic Components	% by Weight (range)
1. Lime slurry sludge	80 - 100 %
2. Fiberglass debris from tank walls	0 - 20%
3.	
4.	
5.	

Color	Odor (describe)	Does Waste Contain Free Liquids?	% Solids	pH:	Flash Point
off white	none	☐ YES or ☑ NO	100	solid	none °F

Attach Laboratory Analytical Report (and/or Material Safety Data Sheet) Including Chain of Custody and Required Parameters Provided for this Profile

Does this waste or generating process contain regulated concentrations of the following Pesticides and/or Herbicides: Chlordane, Endrin, Heptachlor (and its epoxides), Lindane, Methoxychlor, Toxaphene, 2,4-D, or 2,4,5-TP Silvex as defined in 40 CFR 261.33?	☐ Yes or ☑ No
Does this waste contain reactive sulfides (greater than 500 ppm) or reactive cyanide (greater than 250 ppm)[reference 40 CFR 261.23(a)(5)]?	☐ Yes or ☑ No
Does this waste contain regulated concentrations of Polychlorinated Biphenyls (PCBs) as defined in 40 CFR Part 761?	☐ Yes or ☑ No
Does this waste contain concentrations of listed hazardous wastes defined in 40 CFR 261.31, 261.32, 261.33, including RCRA F-Listed Solvents?	☐ Yes or ☑ No
Does this waste exhibit a Hazardous Characteristic as defined by Federal and/or State regulations?	☐ Yes or ☑ No
Does this waste contain regulated concentrations of 2,3,7,8-Tetrachlorodibenzodioxin (2,3,7,8-TCCD), or any other dioxin as defined in 40 CFR 261.31?	☐ Yes or ☑ No
Is this a regulated Radioactive Waste as defined by Federal and/or State regulations?	☐ Yes or ☑ No
Is this a regulated Medical or Infectious Waste as defined by Federal and/or State regulations?	☐ Yes or ☑ No
Is this waste a reactive or heat generating waste?	☐ Yes or ☑ No
Does the waste contain sulfur or sulfur by-products?	☐ Yes or ☑ No
Is this waste generated at a Federal Superfund Clean Up Site?	☐ Yes or ☑ No
Is this waste from a TSD facility, TSD like facility or consolidator?	☐ Yes or ☑ No

VI. Certification

I hereby certify that to the best of my knowledge and belief, the information contained herein is a true, complete and accurate description of the waste material being offered for disposal and all known or suspected hazards have been disclosed. All Analytical Results/Material Safety Data Sheets submitted are truthful and complete and are representative of the waste.

I further certify that by utilizing this profile, neither myself nor any other employee of the company will deliver for disposal or attempt to deliver for disposal any waste which is classified as toxic waste, hazardous waste or infectious waste, or any other waste material this facility is prohibited from accepting by law. I shall immediately give written notice of any change or condition pertaining to the waste not provided herein. Our company hereby agrees to fully indemnify this disposal facility against any damages resulting from this certification being inaccurate or untrue.

I further certify that the company has not altered the form or content of this profile sheet as provided by Republic Services Inc.

[signature]	QIP.
Authorized Representative Name And Title (Type or Print)	Company Name
William Fowler. / HAC. Maint. Mgr.	5/5/2015.
Authorized Representative Signature	Date

© Republic Services, April 2013

Profile Tracking # _____

WASTE PROFILE FORM

For assistance in completing this document or for additional information on EQ's service offerings, please visit our website at www.eqonline.com, or call 800-592-5489.

EQ – The Environmental Quality Company will choose the appropriate facility and method of waste management for your waste from the technologies offered at each EQ operation.

If you wish to direct this waste to a specific EQ facility(s) or treatment technology please indicate here:

Waste Common Name: Hyrdochloric acid

Section 1 – Generator & Customer Information

Generator EPA ID # VAR000007534
Generator Quality Investment Properties, LLC
Facility Address 6000 Technology Blvd
City Richmond State VA Zip 23150
24-hour Emergency Response Number

Mailing Address Same
City State Zip
Generator Contact William Fowler
Title
Phone 804 952-8421 Fax
E-mail

Internal Use Only: EQ Division
EQ Customer No.
Invoicing Company Potomac Environmental, Inc.
Address PO Box 1836
City Stafford State VA Zip 22555
Country
Invoicing Contact Tom Kalil
Phone 540-659-1894 Fax
Technical Contact Tom Kalil
Phone 540-659-1894 Fax
Cell Phone
E-mail tkalil@potomacenv.com

Section 2 – Shipping & Packaging Information

2.1) Shipping Volume & Frequency:
a) Volume of Waste to be Shipped: 250 gal tote
b) Frequency: ☒ One time ☐ Month ☐ Year ☐ Other:

2.2) DOT Information
a) Is this a U.S. Department of Transportation (USDOT) Hazardous Material? ☒ Yes ☐ No
b) If "Yes", indicate the proper shipping name per 49CFR 172.101 Hazardous Materials Table:
RQ, UN1789, Hydrochloric acid, 8, PG II

Section 3 – Special Properties

3.1) Color cloudy

3.2) Odor ☐ None ☐ Ammonia ☐ Amines ☐ Mercaptans ☐ Sulfur ☐ Organic Acid ☐ Amines/Ammonia ☒ Other: acid

3.3) Consistency at 70^{0}F: ☐ Solid ☐ Dust/Powder ☐ Debris ☐ Sludge ☒ Liquid ☐ Gas/Aerosol ☐ Varies

3.4) What is the pH? ☒ ≤2 ☐ 2.1-4.9 ☐ 5 – 10 ☐ 10.1 – 12.4 ☐ ≥12.5 ☐ N/A

3.5) What is the flash point? ☐ <90^{0}F ☐ 90-139^{0}F ☐ 140-199^{0}F ☒ >200^{0}F ☐ N/A

3.6) Does this waste exhibit any of the following properties? **(check all that apply)**

☐ **None**	☒ Free Liquids	☐ Metal Fines	☐ Water Reactive	☐ Biohazard
☐ Shock Sensitive	☐ Oily Residue	☐ Dioxins	☐ Furans	☐ Aluminum
☐ Asbestos – non-friable	☐ Asbestos – friable	☐ Other Radioactive	☐ Air Reactive	☐ Isocyanates
☐ Biodegradable Sorbents	☐ Pyrophoric	☐ Reactive Sulfide	☐ Reactive Cyanide	☐ Explosives
☐ Temperature Controlled Organic Peroxide		☐ NORM	☐ TENORM	

Section 4 – Composition and Generating Process

4.1) Provide a physical and chemical composition of the waste (e.g. soil, water, PPE, debris, etc.). List the percent ranges of the material, either estimated or known.

36-38% hydrochloric acid 100 to 100 % to %

to % to %

to % to %

4.2) Provide a description of the generating process. *Remediation & IDW Sites: please provide a site history.*
Off-spec, out of date unused material

4.3) Are there any known previous handling or treatment issues involving this waste? ☐ Yes* ☒ No
*If yes, describe:

Section 5 – Hazardous Wastes

As determined by 40 CFR, Part 261 and State Rules: **Please list applicable waste code(s):**

5.1) Is this waste exempted from RCRA? ☐ Yes, please provide exemption: ☒ No

5.2) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ☐ Yes: ☒ No
a) For F006–F009, F012, does this come from a generator that conducts a cyanide plating process? ☐Yes ☐No

5.3) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ☒ Yes:D002 ☐ No

5.4) Do any State Specific Hazardous Waste Codes apply? ☐ Yes: ☒ No

If you answered 'no' to 5.2, 5.3 and 5.4, please proceed to Section 6.

5.5) EPA Source Code: EPA Form Code:

5.6) Waste Code Determination Is Based On: ☒ Generator Knowledge ☐ Analysis ☐ MSDS
Analysis and/or MSDS may be required for review and approval for hazardous and non-hazardous waste streams.

5.7) Does this waste exceed Land Disposal Restriction levels? ☒ Yes ☐ No

a) Is this stream a wastewater (WW) or non-wastewater (NWW)? ☐ WW ☒ NWW
b) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40CFR 268.49? ☐ Yes ☐ No
c) Does this waste contain greater than 50% debris, by volume? ☐ Yes ☒ No
(Debris is greater than 2.5 inches in size.)
d) If the debris is larger than 3 ft x 3 ft x 3 ft, please provide the approximate dimensions and weight:

5.8) If this is a characteristic hazardous waste, does it contain Underlying Hazardous Constituents? ☐ Yes* ☒ No

*If Yes, please list:

For a complete list of UHC constituents, please refer to 40 CFR 268.48

Section 6 – Non-Hazardous Wastes

Please list applicable waste code(s):

6.1) Do any State Specific Non-Hazardous Waste Codes apply? ☐ Yes ☒ No

6.2) Is this a Universal (UNIV) waste or a Recyclable Good (RG)? ☐ UNIV ☐ RG ☒ N/A

6.3) Is this waste used oil as defined by 40 CFR Part 279? ☐ Yes ☒ No

a) If yes, is the total halogen content of the used oil waste stream greater than 1,000 ppm? ☐ Yes ☐ No

b) If yes, what is the source of the halogen content?

- ☐ This is a metalworking oil/fluid containing chlorinated paraffins.
- ☐ This is used oil contaminated with chlorofluorocarbons from refrigeration units.
- ☐ This oil contains halogenated solvents. List specific solvents:
- ☐ Other, describe:

Section 7 – TSCA Information

7.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-49 ppm ☐ 50-499 ppm ☐ 500+ ppm

7.2) Does the waste contain PCB contamination from a source with a concentration ≥ 50 ppm? ☐Yes ☒No ☐ Unknown

If you answered "none" or "0-49 ppm"' to 7.1 and "no" to 7.2, please proceed to Section 8.

7.3) Has this waste been processed into a non-liquid form? ☐ Yes* ☐ No

*If yes, what was the concentration of PCBs prior to processing? ☐ 0-499 ppm ☐ 500+ ppm

7.4) Is this non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No

7.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No

7.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ N/A ☐ Yes ☐ No

Section 8 – Clean Air Act Information

8.1) Is this waste subject to regulation under 40 CFR, Part 264, Subpart CC (VOC > 500 ppmw)? ☐ Yes ☒ No

8.2) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD (VOHAP > 500 ppmw)? ☐ Yes ☒ No

8.3) Is the site, or waste, subject to any other NESHAP/MACT standard(s)? ☐ Yes* ☒ No

*If Yes this document serves as notification that this waste contains chemicals , required to be managed in accordance with Part ☐ 61 ☐ 62 ☐ 63 Subpart of NESHAP/MACT standards.

8.4) Does this waste stream contain Benzene? ☐ Yes ☒ No

If you answered "no" to 8.4, please proceed to Section 9.

8.5) Does the waste stream come from a facility subject to 40 CFR 61, Subpart FF (Benzene NESHAP)?

☐ Yes, please provide the SIC/NAICS code: ☐ No

If you answered "no" to questions 8.5, please proceed to Section 9.

8.6) Does your facility manage the waste subject to Benzene NESHAP in a manner other than shipping off-site?

☐ Yes, please specify: ☐ No

8.7) Is the generating source of this waste a facility with Total Annual Benzene (TAB) ≥10 Mg/year? ☐ Yes ☐ No

8.8) Does the waste contain >10% water? ☐ Yes ☐ No

8.9) What is the TAB quantity for your facility? Mg/Year

8.10) What is the total Benzene concentration in your waste? Percent or ppmw.

Supporting analysis must be attached. Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.

Section 9 – Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's personnel to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's personnel to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

If I am an agent acting on behalf of the generator, I also certify that I have permission to sign any and all waste characterization paperwork on the generator's behalf and that I can produce such certification in writing upon request.

Generator Signature _____ Printed Name Lillian Fowler.

Company QTI. Title FAC. MAINT. MGR. Date 5/11/15.

STANDARD TERMS AND CONDITIONS

The Agreement between the Customer and EQ – The Environmental Quality Company and/or its member companies (hereinafter "EQ") related to or associated with Delivered Waste, as herein defined, shall be governed by the following Standard Terms and Conditions in addition to the terms and conditions contained in any Waste Profile Form, Customer Approval Quote Confirmation, Generator Approval Notification, Notice of Waste Approval Expiration, and/or Credit Agreement associated with such Delivered Waste.

The Customer may use its standard forms (such as purchase orders, acknowledgments of orders, and invoices) to administer its dealings under this Agreement for convenience purposes, but all provisions thereof in conflict with these terms and conditions shall be deemed stricken.

Definitions

The following definitions shall apply for purposes of this Agreement:

"Acceptable Waste" shall mean any hazardous waste, as defined under applicable State or federal law, determined by EQ as acceptable for treatment and/or disposal in accordance with this Agreement.

"Delivered Wastes" shall mean all wastes (i) which are transported, delivered, or tendered to EQ by the Customer; (ii) which the Customer has arranged for the transport, delivery or tender to EQ; or (iii)) which are transported, delivered, or tendered to EQ under a Credit Agreement between the Customer and EQ.

"Non-Conforming Wastes" shall mean wastes that (a) are not in accordance in all material respects with the warranties, descriptions, specifications or limitations stated in the Waste Profile Form and this Agreement; (b) have constituents or components of a type or concentration not specifically identified in the Waste Profile Form (i) which increase the nature or extent of the hazard and risk undertaken by EQ in treating and/or disposing of the waste, or (ii) for whose treatment and/or disposal a Waste Management Facility is not designed or permitted, or (iii) which increase the cost of treatment and/or disposal of waste beyond that specified in EQ's price quote; or (c) are not properly packaged, labeled, described, or placarded, or otherwise not in compliance with United States Department of Transportation and United States Environmental Protection Agency regulations.

Control of Operations.

EQ shall have sole control over all aspects of the operation of any treatment and/or disposal facility of EQ receiving Delivered Wastes under this Agreement (hereinafter, "Waste Management Facility"), including, without limitation, maintaining EQ's desired volume of Acceptable Wastes being delivered to any Waste Management Facility by the Customer or any other person or entity.

Identification of Waste.

For each waste material to be transported, delivered, or tendered to EQ under this Agreement, the Customer shall provide, or cause to be provided, to EQ a representative sample of the waste material and a completed Waste Profile Form containing a physical and chemical description or analysis of such waste material, which description shall conform with any and all guidelines for waste acceptance provided by EQ. On the basis of EQ's analysis of such representative sample of the waste material and such Waste Profile Form, EQ will determine whether such wastes are Acceptable Wastes. EQ does not make any guarantee that it will handle any waste material or any particular quantity or type of waste material, and EQ reserves the right to the decline to transport, treat and/or dispose of waste material. The Customer shall promptly furnish to EQ any information regarding known, suspected or planned changes in the composition of the waste material. Further, the Customer shall promptly inform EQ of any change in the characteristic or condition of the waste material which becomes known to the Customer subsequent to the date of the Waste Profile Form.

Non-Conforming Wastes.

In the event that EQ at any time discovers that any Delivered Waste is Non-Conforming Waste, EQ may reject or revoke its acceptance of the Non-Conforming Waste. The Customer shall have seven (7) days to direct an alternative lawful manner of disposition of the waste, unless it is necessary by reason of law or otherwise to move the Non-Conforming Waste prior to expiration of the seven (7) day period. If the Customer does not direct an alternative disposal, at its option, EQ may return any such Non-Conforming Wastes to the Customer, and the Customer shall pay or reimburse EQ for all costs and expenses incurred by EQ in connection with the receipt, handling, sampling, analyses, transportation and return to the Customer of such Non-Conforming Wastes. If it is impossible or impractical for EQ to return the Non-Conforming Waste to the Customer, the Customer shall reimburse EQ for all costs, of any type or nature whatsoever, incurred by EQ, solely because such Delivered Waste was Non-Conforming Waste (including, but not limited to, all costs associated with any remedial steps necessary, due to the nature of the Non-Conforming Waste, in connection with material with which the Non-Conforming Waste may have been commingled and all expenses and charges for analyzing, handling, locating, preparing for transporting, storing and disposing of any Non-Conforming Waste).

Customer Warranty - Acceptable Wastes.

All Delivered Wastes shall be Acceptable Wastes and shall conform in all material respects to the description and specifications contained in the Waste Profile Form. The information set forth in the Waste Profile Form or any manifest, placard or label associated with any Delivered Wastes, or otherwise represented by the Customer or the generator (if other than the Customer) to EQ, is and shall be true, accurate and complete as of the date of receipt of the involved waste by EQ.

Customer Warranty - Title to Wastes.

Either the Customer or the generator (if other than the Customer) shall hold clear title, free of any all liens, claims, encumbrances, and charges to Delivered Waste until such waste is accepted by EQ.

Customer Warranty - Compliance with Laws.

The Customer shall comply with all applicable federal, state and local environmental statutes, regulations, and other governmental requirements, as well as directives issued by EQ from time to time, governing the transportation, treatment and/or disposal of Acceptable Wastes, including, but not limited to, all packaging, manifesting, containerization, placarding and labeling requirements.

Customer Warranty - Updating Information.

If the Customer receives information that Delivered Waste or other hazardous waste described in the Waste Profile Form, or some component of such waste, presents or may present a hazard or risk to persons, property or the environment which was not disclosed to EQ, or if the Customer or generator (if other than the Customer) has changed the process by which such waste results, the Customer shall promptly report such information to EQ in writing.

Customer Indemnity.

The Customer shall indemnify, defend and hold harmless EQ, and its affiliated or related companies, and all of their respective present or future officers, directors, shareholders, employees and agents from and against any and all losses, damages, liabilities, penalties, fines, forfeitures, demands, claims, causes of action, suits, costs and expenses (including, but not limited to, reasonable costs of defense, settlement, and reasonable attorneys' fees), which may be asserted against any or all of them by any person or any governmental agency, or which any or all of them may hereafter suffer, incur, be responsible for or pay out, as a result of or in connection with bodily injuries (including, but not limited to, death, sickness, disease and emotional or mental distress) to any person (including EQ's employees), damage (including, but not limited to, loss of use) to any property (public or private), or any requirements to conduct or incur expense for investigative, removal or remedial expenses in connection with contamination of or adverse effect on the environment, or any violation or alleged violation of any statues, ordinances, orders, rules or regulations of any governmental entity or agency, caused or arising out of (i) a breach of this Agreement by the Customer, (ii) the failure of any warranty of the Customer to be true, accurate and complete, or (iii) any willful or negligent act or omission of the Customer, or its employees or agents in connection with the performance of this Agreement.

Force Majeure

EQ shall not be liable for any failure to accept, receive, handle, treat, and/or dispose of Delivered Waste due to an act of God, fire, casualty, flood, war, strike, lockout, labor trouble, failure of public utilities, equipment failure, facility shutdown, injunction, accident, epidemic, riot, insurrection, destruction of operation or transportation facilities, the inability to procure materials, equipment, or sufficient personnel or energy in order to meet operational needs without the necessity of allocation, the failure or inability to obtain any governmental approvals or to meet Environmental Requirements (including, but not limited to voluntary or involuntary compliance with any act, exercise, assertion, or requirement of any governmental authority) which may temporarily or permanently prohibit operations of EQ, the Customer, or the Generator, or any other circumstances beyond the control of EQ which prevents or delays performance of any of its obligations under this Agreement.

Governing Laws

This Agreement shall in all respects be governed by and shall be construed in accordance with the laws of the State of Michigan applied to contracts executed and performed wholly within such state.

Bulk Disposal Charges

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.

Profile Tracking # _____

WASTE PROFILE FORM

For assistance in completing this document or for additional information on EQ's service offerings, please visit our website at www.eqonline.com, or call 800-592-5489.

EQ – The Environmental Quality Company will choose the appropriate facility and method of waste management for your waste from the technologies offered at each EQ operation.

If you wish to direct this waste to a specific EQ facility(s) or treatment technology please indicate here:

Waste Common Name: Lead Debris

Section 1 – Generator & Customer Information

Generator EPA ID # VAR000007534
Generator Quality Investment Properties, LLC
Facility Address 6000 Technology Blvd
City Richmond State VA Zip 23150
24-hour Emergency Response Number

Mailing Address Same
City State Zip
Generator Contact William Fowler
Title
Phone 804 952-8421 Fax
E-mail

Internal Use Only: EQ Division
EQ Customer No.
Invoicing Company Potomac Environmental, Inc.
Address PO Box 1836
City Stafford State VA Zip 22555
Country
Invoicing Contact Tom Kalil
Phone 540-659-1894 Fax
Technical Contact Tom Kalil
Phone 540-659-1894 Fax
Cell Phone
E-mail tkalil@potomacenv.com

Section 2 – Shipping & Packaging Information

2.1) Shipping Volume & Frequency:
a) Volume of Waste to be Shipped: 1-5 55 gallon drums
b) Frequency: ☐ One time ☐ Month ☒ Year ☐ Other:

2.2) DOT Information
a) Is this a U.S. Department of Transportation (USDOT) Hazardous Material? ☒ Yes ☐ No
b) If "Yes", indicate the proper shipping name per 49CFR 172.101 Hazardous Materials Table:
UN3077, Hazardous Waste solid, nos, 9, PG III

Section 3 – Special Properties

3.1) Color various

3.2) Odor ☒ None ☐ Ammonia ☐ Amines ☐ Mercaptans ☐ Sulfur ☐ Organic Acid ☐ Amines/Ammonia ☐ Other:

3.3) Consistency at 70^{0}F: ☒ Solid ☐ Dust/Powder ☐ Debris ☐ Sludge ☒ Liquid ☐ Gas/Aerosol ☐ Varies

3.4) What is the pH? ☐ ≤2 ☐ 2.1-4.9 ☐ 5 – 10 ☐ 10.1 – 12.4 ☐ ≥12.5 ☒ N/A

3.5) What is the flash point? ☐ <90^{0}F ☐ 90-139^{0}F ☐ 140-199^{0}F ☐ >200^{0}F ☒ N/A

3.6) Does this waste exhibit any of the following properties? **(check all that apply)**

☒ **None**	☐ Free Liquids	☐ Metal Fines	☐ Water Reactive	☐ Biohazard
☐ Shock Sensitive	☐ Oily Residue	☐ Dioxins	☐ Furans	☐ Aluminum
☐ Asbestos – non-friable	☐ Asbestos – friable	☐ Other Radioactive	☐ Air Reactive	☐ Isocyanates
☐ Biodegradable Sorbents	☐ Pyrophoric	☐ Reactive Sulfide	☐ Reactive Cyanide	☐ Explosives
☐ Temperature Controlled Organic Peroxide		☐ NORM	☐ TENORM	

Section 4 – Composition and Generating Process

4.1) Provide a physical and chemical composition of the waste (e.g. soil, water, PPE, debris, etc.). List the percent ranges of the material, either estimated or known.

PVC pipe 90 to 100 % to %

Debris, ppe 0 to 10 % to %

to % to %

4.2) Provide a description of the generating process. *Remediation & IDW Sites: please provide a site history.*
PVC pipe that had carried a nitric/lead solution. The pipes were drained and dried. Lead residue is left on the pipes.

4.3) Are there any known previous handling or treatment issues involving this waste? ☐ Yes* ☒ No
*If yes, describe:

Section 5 – Hazardous Wastes

As determined by 40 CFR, Part 261 and State Rules: **Please list applicable waste code(s):**

5.1) Is this waste exempted from RCRA? ☐ Yes, please provide exemption: ☒ No

5.2) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ☐ Yes: ☒ No
a) For F006–F009, F012, does this come from a generator that conducts a cyanide plating process? ☐Yes ☐No

5.3) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ☒ Yes:D008 ☐ No

5.4) Do any State Specific Hazardous Waste Codes apply? ☐ Yes: ☒ No

If you answered 'no' to 5.2, 5.3 and 5.4, please proceed to Section 6.

5.5) EPA Source Code: EPA Form Code:

5.6) Waste Code Determination Is Based On: ☒ Generator Knowledge ☐ Analysis ☐ MSDS
Analysis and/or MSDS may be required for review and approval for hazardous and non-hazardous waste streams.

5.7) Does this waste exceed Land Disposal Restriction levels? ☒ Yes ☐ No

a) Is this stream a wastewater (WW) or non-wastewater (NWW)? ☐ WW ☒ NWW
b) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40CFR 268.49? ☐ Yes ☐ No
c) Does this waste contain greater than 50% debris, by volume? ☐ Yes ☒ No
(Debris is greater than 2.5 inches in size.)
d) If the debris is larger than 3 ft x 3 ft x 3 ft, please provide the approximate dimensions and weight:

5.8) If this is a characteristic hazardous waste, does it contain Underlying Hazardous Constituents? ☐ Yes* ☒ No

*If Yes, please list:

For a complete list of UHC constituents, please refer to 40 CFR 268.48

Section 6 – Non-Hazardous Wastes

Please list applicable waste code(s):

6.1) Do any State Specific Non-Hazardous Waste Codes apply? ☐ Yes ☒ No
6.2) Is this a Universal (UNIV) waste or a Recyclable Good (RG)? ☐ UNIV ☐ RG ☒ N/A
6.3) Is this waste used oil as defined by 40 CFR Part 279? ☐ Yes ☒ No
a) If yes, is the total halogen content of the used oil waste stream greater than 1,000 ppm? ☐ Yes ☐ No
b) If yes, what is the source of the halogen content?
☐ This is a metalworking oil/fluid containing chlorinated paraffins.
☐ This is used oil contaminated with chlorofluorocarbons from refrigeration units.
☐ This oil contains halogenated solvents. List specific solvents:
☐ Other, describe:

Section 7 – TSCA Information

7.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-49 ppm ☐ 50-499 ppm ☐ 500+ ppm
7.2) Does the waste contain PCB contamination from a source with a concentration ≥ 50 ppm? ☐ Yes ☒ No ☐ Unknown
If you answered "none" or "0-49 ppm"' to 7.1 and "no" to 7.2, please proceed to Section 8.
7.3) Has this waste been processed into a non-liquid form? ☐ Yes* ☐ No
*If yes, what was the concentration of PCBs prior to processing? ☐ 0-499 ppm ☐ 500+ ppm
7.4) Is this non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No
7.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No
7.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ N/A ☐ Yes ☐ No

Section 8 – Clean Air Act Information

8.1) Is this waste subject to regulation under 40 CFR, Part 264, Subpart CC (VOC > 500 ppmw)? ☐ Yes ☒ No
8.2) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD (VOHAP > 500 ppmw)? ☐ Yes ☒ No
8.3) Is the site, or waste, subject to any other NESHAP/MACT standard(s)? ☐ Yes* ☒ No

*If Yes this document serves as notification that this waste contains chemicals , required to be managed in accordance with Part ☐ 61 ☐ 62 ☐ 63 Subpart of NESHAP/MACT standards.

8.4) Does this waste stream contain Benzene? ☐ Yes ☒ No
If you answered "no" to 8.4, please proceed to Section 9.
8.5) Does the waste stream come from a facility subject to 40 CFR 61, Subpart FF (Benzene NESHAP)?

☐ Yes, please provide the SIC/NAICS code: ☐ No

If you answered "no" to questions 8.5, please proceed to Section 9.
8.6) Does your facility manage the waste subject to Benzene NESHAP in a manner other than shipping off-site?

☐ Yes, please specify: ☐ No

8.7) Is the generating source of this waste a facility with Total Annual Benzene (TAB) ≥10 Mg/year? ☐ Yes ☐ No
8.8) Does the waste contain >10% water? ☐ Yes ☐ No
8.9) What is the TAB quantity for your facility? Mg/Year

8.10) What is the total Benzene concentration in your waste? Percent or ppmw.
Supporting analysis must be attached. Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.

Section 9 – Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's personnel to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's personnel to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

If I am an agent acting on behalf of the generator, I also certify that I have permission to sign any and all waste characterization paperwork on the generator's behalf and that I can produce such certification in writing upon request.

Generator Signature [signature] Printed Name William Fowler

Company Q 71. Title FAC Maint. MGR Date 5/11/15

STANDARD TERMS AND CONDITIONS

The Agreement between the Customer and EQ – The Environmental Quality Company and/or its member companies (hereinafter "EQ") related to or associated with Delivered Waste, as herein defined, shall be governed by the following Standard Terms and Conditions in addition to the terms and conditions contained in any Waste Profile Form, Customer Approval Quote Confirmation, Generator Approval Notification, Notice of Waste Approval Expiration, and/or Credit Agreement associated with such Delivered Waste.

The Customer may use its standard forms (such as purchase orders, acknowledgments of orders, and invoices) to administer its dealings under this Agreement for convenience purposes, but all provisions thereof in conflict with these terms and conditions shall be deemed stricken.

Definitions

The following definitions shall apply for purposes of this Agreement:

"Acceptable Waste" shall mean any hazardous waste, as defined under applicable State or federal law, determined by EQ as acceptable for treatment and/or disposal in accordance with this Agreement.

"Delivered Wastes" shall mean all wastes (i) which are transported, delivered, or tendered to EQ by the Customer; (ii) which the Customer has arranged for the transport, delivery or tender to EQ; or (iii)) which are transported, delivered, or tendered to EQ under a Credit Agreement between the Customer and EQ.

"Non-Conforming Wastes" shall mean wastes that (a) are not in accordance in all material respects with the warranties, descriptions, specifications or limitations stated in the Waste Profile Form and this Agreement; (b) have constituents or components of a type or concentration not specifically identified in the Waste Profile Form (i) which increase the nature or extent of the hazard and risk undertaken by EQ in treating and/or disposing of the waste, or (ii) for whose treatment and/or disposal a Waste Management Facility is not designed or permitted, or (iii) which increase the cost of treatment and/or disposal of waste beyond that specified in EQ's price quote; or (c) are not properly packaged, labeled, described, or placarded, or otherwise not in compliance with United States Department of Transportation and United States Environmental Protection Agency regulations.

Control of Operations.

EQ shall have sole control over all aspects of the operation of any treatment and/or disposal facility of EQ receiving Delivered Wastes under this Agreement (hereinafter, "Waste Management Facility"), including, without limitation, maintaining EQ's desired volume of Acceptable Wastes being delivered to any Waste Management Facility by the Customer or any other person or entity.

Identification of Waste.

For each waste material to be transported, delivered, or tendered to EQ under this Agreement, the Customer shall provide, or cause to be provided, to EQ a representative sample of the waste material and a completed Waste Profile Form containing a physical and chemical description or analysis of such waste material, which description shall conform with any and all guidelines for waste acceptance provided by EQ. On the basis of EQ's analysis of such representative sample of the waste material and such Waste Profile Form, EQ will determine whether such wastes are Acceptable Wastes. EQ does not make any guarantee that it will handle any waste material or any particular quantity or type of waste material, and EQ reserves the right to the decline to transport, treat and/or dispose of waste material. The Customer shall promptly furnish to EQ any information regarding known, suspected or planned changes in the composition of the waste material. Further, the Customer shall promptly inform EQ of any change in the characteristic or condition of the waste material which becomes known to the Customer subsequent to the date of the Waste Profile Form.

Non-Conforming Wastes.

In the event that EQ at any time discovers that any Delivered Waste is Non-Conforming Waste, EQ may reject or revoke its acceptance of the Non-Conforming Waste. The Customer shall have seven (7) days to direct an alternative lawful manner of disposition of the waste, unless it is necessary by reason of law or otherwise to move the Non-Conforming Waste prior to expiration of the seven (7) day period. If the Customer does not direct an alternative disposal, at its option, EQ may return any such Non-Conforming Wastes to the Customer, and the Customer shall pay or reimburse EQ for all costs and expenses incurred by EQ in connection with the receipt, handling, sampling, analyses, transportation and return to the Customer of such Non-Conforming Wastes. If it is impossible or impractical for EQ to return the Non-Conforming Waste to the Customer, the Customer shall reimburse EQ for all costs, of any type or nature whatsoever, incurred by EQ, solely because such Delivered Waste was Non-Conforming Waste (including, but not limited to, all costs associated with any remedial steps necessary, due to the nature of the Non-Conforming Waste, in connection with material with which the Non-Conforming Waste may have been commingled and all expenses and charges for analyzing, handling, locating, preparing for transporting, storing and disposing of any Non-Conforming Waste).

Customer Warranty - Acceptable Wastes.

All Delivered Wastes shall be Acceptable Wastes and shall conform in all material respects to the description and specifications contained in the Waste Profile Form. The information set forth in the Waste Profile Form or any manifest, placard or label associated with any Delivered Wastes, or otherwise represented by the Customer or the generator (if other than the Customer) to EQ, is and shall be true, accurate and complete as of the date of receipt of the involved waste by EQ.

Customer Warranty - Title to Wastes.

Either the Customer or the generator (if other than the Customer) shall hold clear title, free of any all liens, claims, encumbrances, and charges to Delivered Waste until such waste is accepted by EQ.

Customer Warranty - Compliance with Laws.

The Customer shall comply with all applicable federal, state and local environmental statutes, regulations, and other governmental requirements, as well as directives issued by EQ from time to time, governing the transportation, treatment and/or disposal of Acceptable Wastes, including, but not limited to, all packaging, manifesting, containerization, placarding and labeling requirements.

Customer Warranty - Updating Information.

If the Customer receives information that Delivered Waste or other hazardous waste described in the Waste Profile Form, or some component of such waste, presents or may present a hazard or risk to persons, property or the environment which was not disclosed to EQ, or if the Customer or generator (if other than the Customer) has changed the process by which such waste results, the Customer shall promptly report such information to EQ in writing.

Customer Indemnity.

The Customer shall indemnify, defend and hold harmless EQ, and its affiliated or related companies, and all of their respective present or future officers, directors, shareholders, employees and agents from and against any and all losses, damages, liabilities, penalties, fines, forfeitures, demands, claims, causes of action, suits, costs and expenses (including, but not limited to, reasonable costs of defense, settlement, and reasonable attorneys' fees), which may be asserted against any or all of them by any person or any governmental agency, or which any or all of them may hereafter suffer, incur, be responsible for or pay out, as a result of or in connection with bodily injuries (including, but not limited to, death, sickness, disease and emotional or mental distress) to any person (including EQ's employees), damage (including, but not limited to, loss of use) to any property (public or private), or any requirements to conduct or incur expense for investigative, removal or remedial expenses in connection with contamination of or adverse effect on the environment, or any violation or alleged violation of any statues, ordinances, orders, rules or regulations of any governmental entity or agency, caused or arising out of (i) a breach of this Agreement by the Customer, (ii) the failure of any warranty of the Customer to be true, accurate and complete, or (iii) any willful or negligent act or omission of the Customer, or its employees or agents in connection with the performance of this Agreement.

Force Majeure

EQ shall not be liable for any failure to accept, receive, handle, treat, and/or dispose of Delivered Waste due to an act of God, fire, casualty, flood, war, strike, lockout, labor trouble, failure of public utilities, equipment failure, facility shutdown, injunction, accident, epidemic, riot, insurrection, destruction of operation or transportation facilities, the inability to procure materials, equipment, or sufficient personnel or energy in order to meet operational needs without the necessity of allocation, the failure or inability to obtain any governmental approvals or to meet Environmental Requirements (including, but not limited to voluntary or involuntary compliance with any act, exercise, assertion, or requirement of any governmental authority) which may temporarily or permanently prohibit operations of EQ, the Customer, or the Generator, or any other circumstances beyond the control of EQ which prevents or delays performance of any of its obligations under this Agreement.

Governing Laws

This Agreement shall in all respects be governed by and shall be construed in accordance with the laws of the State of Michigan applied to contracts executed and performed wholly within such state.

Bulk Disposal Charges

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.

FACILITY PROFILE FORM

Giant Resource Recovery

The Best Solution - Recycling & Resource Recovery

Giant Resource Recovery - Sumter, Inc. • 755 Industrial Road • PO Box 1755 • Sumter, SC 29151
Phone: (803) 773-1400 • Fax: (803) 775-4145 • S C D 0 3 6 2 7 5 6 2 6

Facility Use Only:

PROFILE NUMBER _____

Date: _____ Account #: _____

Sales # / Broker # _____

Classification: ☐ New Customer ☐ New S/A

[X] New ☐ Amendment

TREATMENT METHOD: F

A. GENERATOR INFORMATION

GENERATOR STATUS: ☐ Conditionally Exempt ☐ Small Quantity [X] Large Quantity

Generator Name: Quality Investment Properties, LLC EPA ID# VAR000007534

Primary Contact: William Fowler Phone #: 804-952-8421 Fax#: _____

Location Address: 6000 Technology Blvd City: Richmond State: VA Zip: 23150 County: _____

Mailing Address: Same City: _____ State: _____ Zip: _____ County: _____

Billing Name: Potomac Environmental, Inc. Phone #: 800-659-1094 Contact: Tom Kalil

Billing Address: P. O. Box 1836 City: Stafford State: VA Zip: 22555 County: _____

E-mail Information: Generator Primary Contact: tkalil@potomacenv.com Billing Contact: Tom Kalil

B. WASTE DESCRIPTION

Waste Name: High water solvent

Description of Process Generating Waste: Clean-out of spent solvent tanks. Solvents used in circuit board cleaning

EPA Waste Code(s): D001

C. WASTE CHARACTERISTICS (@ 70°F)

Physical State: ☐ Solid [X] Liquid ☐ Sludge Thousands of BTU's/lb: <5,000 Halogens (Cl, F, Br): nd % or _____ ppm

Viscosity: [X] Low(Thin) ☐ Medium ☐ High Specific Gravity: .9-1 Flash Point: ☐ None [X] <140 ☐ >140

Layering: [X] None ☐ Bilayer ☐ Multilayer Total Solids: <10 % pH: 5 to 9 If solid or no water present, pH of 50/50 aqueous slurry

D. CHEMICAL COMPOSITION

Chemical Constituents:

Water (if present)	90-99 %		%
Isopropyl alcohol	0-5 %		%
Ethanol	0-5 %		%
	%		%
	%		%
	%		%
	%		%

Toxins Cyanides _____ ppm Pesticides _____ ppm PCB's _____ ppm Beryllium _____ ppm Antimony _____ ppm

Nickel _____ ppm Thallium _____ ppm Zinc _____ ppm Dioxins _____ ppm [X] (None of the above)

E. SHIPPING INFORMATION

Volume (lbs/yr): 2-3,000 Shipping Frequency: ☐ One Time ☐ Weekly ☐ Monthly ☐ Quarterly [X] Yearly

Container Spec: [X] Drums (size 55gal) ☐ Roll-Off (size: _____) ☐ Tanker ☐ Other: _____

Proper DOT Shipping Name: Waste flammable liquid, n.o.s.

Hazard Class: 3 UN / NA #: UN1993 Packaging Group: III N.O.S. Information: Ethanol, Isopropyl Alcohol

PROCEED TO SECTION "I" ON PAGE 3 FOR NON-HAZARDOUS MATERIAL

F. TCLP CERTIFICATION*

Facility Use Only:

PROFILE NUMBER _____

Complete each section

Regulatory Level Above	Below			Regulatory Level, ppm	Actual Range
	X	D004	Arsenic	5.0	
	X	D005	Barium	100.0	
	X	D006	Cadmium	1.0	
	X	D007	Chromium	5.0	
	X	D008	Lead	5.0	
	X	D009	Mercury	0.2	
	X	D010	Selenium	1.0	
	X	D011	Silver	5.0	
	X	D012	Endrin	0.02	
	X	D013	Lindane	0.4	
	X	D014	Methoxychlor	10.0	
	X	D015	Toxaphene	0.5	
	X	D016	2,4-D	10.0	
	X	D017	2,4,5-TP (Silvex)	1.0	
	X	D018	Benzene	0.5	
	X	D019	Carbon Tetrachlor	0.5	
	X	D020	Chlordane	0.03	
	X	D021	Chlorobenzene	100.0	
	X	D022	Chloroform	6.0	
	X	D023	o-Cresol	200.0	

Regulatory Level Above	Below			Regulatory Level, ppm	Actual Range
	X	D024	m-Cresol	200.0	
	X	D025	p-Cresol	200.0	
	X	D026	Cresol	200.0	
	X	D027	1,4-Dichlorobenzene	7.5	
	X	D028	1,2-Dichloroethane	0.5	
	X	D029	1,1-Dichloroethylene	0.7	
	X	D030	2,4-Dinitrotoluene	0.13	
	X	D031	Heptachlor	0.008	
	X	D032	Hexachlorobenzene	0.13	
	X	D033	Hexachlorobutadiene	0.5	
	X	D034	Hexachloroethane	3.0	
	X	D035	Methyl Ethyl Ketone	200.0	
	X	D036	Nitrobenzene	2.0	
	X	D037	Pentachlorophenol	100.0	
	X	D038	Pyridine	5.0	
	X	D039	Tetrachloroethylene	0.7	
	X	D040	Trichloroethylene	0.5	
	X	D041	2,4,5-Trichlorophenol	400.0	
	X	D042	2,4,6-Trichlorophenol	2.0	
	X	D043	Vinyl Chloride	0.2	

*The above TCLP is based on: ____ Actual Testing X Generator Knowledge ____ Both (Attach all applicable analysis)

G. BENZENE NESHAP QUESTIONNAIRE (Note: If the 1st question is marked "NO," then skip remaining questions in this section)

Does the waste contain benzene? ____Y x NO
Is the waste generated by Petroleum Refineries (SIC 2911), Chemical Manufacturing Plants (SIC 2800-2899), Coke By-Product Recovery Plants (SIC 3312), or TSDF (SIC 4953, 4959, 9511, 4214)? ____Yes, SIC #: _____ or ____ No
What is the benzene concentration in the waste? Min value:_____ Max value:_____ ppm or % (Circle one)
If the concentration of benzene is based on knowledge provide a description:_____
If the concentration of benzene is based on test data, provide date test data was obtained _____
Has the process generating the waste changed since date of concentration determination? ____Yes or ____No
Will any shipments of this waste contain greater than 10% water? ____Yes or ____No
What is your facility's Total Annual Benzene (TAB) in mega-grams (10^6 grams) per year? _____ Mg/yr
Is this waste subject to the Benzene Waste Operations NESHAP controls requirements (per 40 CFR Part 61.342(b))? ____Yes or ____No

H. CERTIFICATION FOR HAZARDOUS WASTE

Generator Certification

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

Signature: _____ Date: 5/11/15.

Print Name: William Fowler Title: FAP. Maint. MGR.

Disposal Facility Certification (for Giant Resource Recovery use, only)

In compliance with 40 CFR 264.12(b), I certify that, based on the information presented in this document, this facility is permitted to accept the waste stream described hereon, and do hereby inform the generator listed hereon of acceptance of the waste for treatment, storage and/or disposal in the manner designated, and in compliance with the TSDF's standard terms and conditions.

Signature: _____ Date: _____

Print Name: _____ Title: _____

FACILITY PROFILE FORM

Giant Resource Recovery

The Best Solution - Recycling & Resource Recovery

Giant Resource Recovery - Sumter, Inc. • 755 Industrial Road • PO Box 1755 • Sumter, SC 29151
Phone: (803) 773-1400 • Fax: (803) 775-4145 • S C D 0 3 6 2 7 5 6 2 6

Facility Use Only:

PROFILE NUMBER _____

Date: _____ Account #: _____

Sales # / Broker # _____

Classification: ☐ New Customer ☐ New S/A

[X] New ☐ Amendment

TREATMENT METHOD: F

A. GENERATOR INFORMATION

GENERATOR STATUS: ☐ Conditionally Exempt ☐ Small Quantity [X] Large Quantity

Generator Name: Quality Investment Properties, LLC EPA ID# VAR000007534

Primary Contact: William Fowler Phone #: 804-952-8421 Fax#: _____

Location Address: 6000 Technology Blvd City: Richmond State: VA Zip: 23150 County: _____

Mailing Address: Same City: _____ State: _____ Zip: _____ County: _____

Billing Name: Potomac Environmental, Inc. Phone #: 800-659-1094 Contact: Tom Kalil

Billing Address: P. O. Box 1836 City: Stafford State: VA Zip: 22555 County: _____

E-mail Information: Generator Primary Contact: tkalil@potomacenv.com Billing Contact: Tom Kalil

B. WASTE DESCRIPTION

Waste Name: Solvent tank bottom sludge

Description of Process Generating Waste: Clean-out of spent solvent tanks. Solvents used in circuit board cleaning

EPA Waste Code(s): D001

C. WASTE CHARACTERISTICS (@ 70°F)

Physical State: [X] Solid [X] Liquid [X] Sludge Thousands of BTU's/lb: <5,000 Halogens (Cl, F, Br): nd % or _____ ppm

Viscosity: [X] Low(Thin) ☐ Medium ☐ High Specific Gravity: >1 Flash Point: ☐ None [X] <140 ☐ >140

Layering: [X] None ☐ Bilayer ☐ Multilayer Total Solids: 80-100 % pH: 5 to 9 If solid or no water present, pH of 50/50 aqueous slurry

D. CHEMICAL COMPOSITION

Chemical Constituents:

Water (if present)	0-20 %		%
Isopropyl alcohol	0-5 %		%
Ethanol	0-5 %		%
Tank bottom sludge, scale dirt	80-100 %		%
	%		%
	%		%
	%		%

Toxins Cyanides _____ ppm Pesticides _____ ppm PCB's _____ ppm Beryllium _____ ppm Antimony _____ ppm

Nickel _____ ppm Thallium _____ ppm Zinc _____ ppm Dioxins _____ ppm [X] (None of the above)

E. SHIPPING INFORMATION

Volume (lbs/yr): 2-3,000 Shipping Frequency: ☐ One Time ☐ Weekly ☐ Monthly ☐ Quarterly [X] Yearly

Container Spec: [X] Drums (size: 55gal) ☐ Roll-Off (size: _____) ☐ Tanker ☐ Other: _____

Proper DOT Shipping Name: Waste flammable liquid, n.o.s.

Hazard Class: 3 UN / NA #: UN1993 Packaging Group: III N.O.S. Information: Ethanol, Isopropyl Alcohol

PROCEED TO SECTION "I" ON PAGE 3 FOR NON-HAZARDOUS MATERIAL

F. TCLP CERTIFICATION*

Facility Use Only:

PROFILE NUMBER _____

Complete each section

Regulatory Level Above	Regulatory Level Below			Regulatory Level, ppm	Actual Range
	X	D004	Arsenic	5.0	
	X	D005	Barium	100.0	
	X	D006	Cadmium	1.0	
	X	D007	Chromium	5.0	
	X	D008	Lead	5.0	
	X	D009	Mercury	0.2	
	X	D010	Selenium	1.0	
	X	D011	Silver	5.0	
	X	D012	Endrin	0.02	
	X	D013	Lindane	0.4	
	X	D014	Methoxychlor	10.0	
	X	D015	Toxaphene	0.5	
	X	D016	2,4-D	10.0	
	X	D017	2,4,5-TP (Silvex)	1.0	
	X	D018	Benzene	0.5	
	X	D019	Carbon Tetrachlor	0.5	
	X	D020	Chlordane	0.03	
	X	D021	Chlorobenzene	100.0	
	X	D022	Chloroform	6.0	
	X	D023	o-Cresol	200.0	

Regulatory Level Above	Regulatory Level Below			Regulatory Level, ppm	Actual Range
	X	D024	m-Cresol	200.0	
	X	D025	p-Cresol	200.0	
	X	D026	Cresol	200.0	
	X	D027	1,4-Dichlorobenzene	7.5	
	X	D028	1,2-Dichloroethane	0.5	
	X	D029	1,1-Dichloroethylene	0.7	
	X	D030	2,4-Dinitrotoluene	0.13	
	X	D031	Heptachlor	0.008	
	X	D032	Hexachlorobenzene	0.13	
	X	D033	Hexachlorobutadiene	0.5	
	X	D034	Hexachloroethane	3.0	
	X	D035	Methyl Ethyl Ketone	200.0	
	X	D036	Nitrobenzene	2.0	
	X	D037	Pentachlorophenol	100.0	
	X	D038	Pyridine	5.0	
	X	D039	Tetrachloroethylene	0.7	
	X	D040	Trichloroethylene	0.5	
	X	D041	2,4,5-Trichlorophenol	400.0	
	X	D042	2,4,6-Trichlorophenol	2.0	
	X	D043	Vinyl Chloride	0.2	

*The above TCLP is based on: ____ Actual Testing ___X___ Generator Knowledge _____ Both (Attach all applicable analysis)

G. BENZENE NESHAP QUESTIONNAIRE (Note: If the 1st question is marked "NO," then skip remaining questions in this section)

Does the waste contain benzene? ____Yx NO
Is the waste generated by Petroleum Refineries (SIC 2911), Chemical Manufacturing Plants (SIC 2800-2899), Coke By-Product Recovery Plants (SIC 3312), or TSDF (SIC 4953, 4959, 9511, 4214)? ____Yes, SIC #: _____ or ____ No
What is the benzene concentration in the waste? Min value:_____ Max value:_____ ppm or % (Circle one)
If the concentration of benzene is based on knowledge provide a description:_____
If the concentration of benzene is based on test data, provide date test data was obtained _____
Has the process generating the waste changed since date of concentration determination? ____Yes or ____No
Will any shipments of this waste contain greater than 10% water? ____Yes or ____No
What is your facility's Total Annual Benzene (TAB) in mega-grams (10^6 grams) per year? _____ Mg/yr
Is this waste subject to the Benzene Waste Operations NESHAP controls requirements (per 40 CFR Part 61.342(b))? ____Yes or ____No

H. CERTIFICATION FOR HAZARDOUS WASTE

Generator Certification

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

Signature: _____ Date: 5/11/15

Print Name: William Fowler Title: FAC. MAINT. MGR.

Disposal Facility Certification (for Giant Resource Recovery use, only)

In compliance with 40 CFR 264.12(b), I certify that, based on the information presented in this document, this facility is permitted to accept the waste stream described hereon, and do hereby inform the generator listed hereon of acceptance of the waste for treatment, storage and/or disposal in the manner designated, and in compliance with the TSDF's standard terms and conditions.

Signature: _____ Date: _____

Print Name: _____ Title: _____

Profile Tracking # _____

WASTE PROFILE FORM

For assistance in completing this document or for additional information on EQ's service offerings, please visit our website at www.eqonline.com, or call 800-592-5489.

EQ – The Environmental Quality Company will choose the appropriate facility and method of waste management for your waste from the technologies offered at each EQ operation.

If you wish to direct this waste to a specific EQ facility(s) or treatment technology please indicate here:

Waste Common Name: Sodium hydroxide solution

Section 1 – Generator & Customer Information

Generator EPA ID # VAR000007534

Generator Quality Investment Properties, LLC

Facility Address 6000 Technology Blvd

City Richmond State VA Zip 23150

24-hour Emergency Response Number

Mailing Address Same

City State Zip

Generator Contact William Fowler

Title

Phone 804 952-8421 Fax

E-mail

Internal Use Only: EQ Division

EQ Customer No.

Invoicing Company Potomac Environmental, Inc.

Address PO Box 1836

City Stafford State VA Zip 22555

Country

Invoicing Contact Tom Kalil

Phone 540-659-1894 Fax

Technical Contact Tom Kalil

Phone 540-659-1894 Fax

Cell Phone

E-mail tkalil@potomacenv.com

Section 2 – Shipping & Packaging Information

2.1) Shipping Volume & Frequency:

a) Volume of Waste to be Shipped: 2-4,000 gal

b) Frequency: ☒ One time ☐ Month ☐ Year ☐ Other:

2.2) DOT Information

a) Is this a U.S. Department of Transportation (USDOT) Hazardous Material? ☒ Yes ☐ No

b) If "Yes", indicate the proper shipping name per 49CFR 172.101 Hazardous Materials Table:

RQ, UN1824, Waste sodium hydroxide solution, 8, PG II

Section 3 – Special Properties

3.1) Color cloudy

3.2) Odor ☒ None ☐ Ammonia ☐ Amines ☐ Mercaptans ☐ Sulfur ☐ Organic Acid ☐ Amines/Ammonia ☐ Other:

3.3) Consistency at 70°F: ☐ Solid ☐ Dust/Powder ☐ Debris ☐ Sludge ☒ Liquid ☐ Gas/Aerosol ☐ Varies

3.4) What is the pH? ☐ ≤2 ☐ 2.1-4.9 ☐ 5 – 10 ☐ 10.1 – 12.4 ☒ ≥12.5 ☐ N/A

3.5) What is the flash point? ☐ <90°F ☐ 90-139°F ☐ 140-199°F ☒ >200°F ☐ N/A

3.6) Does this waste exhibit any of the following properties? **(check all that apply)**

☐ **None**	☒ Free Liquids	☐ Metal Fines	☐ Water Reactive	☐ Biohazard
☐ Shock Sensitive	☐ Oily Residue	☐ Dioxins	☐ Furans	☐ Aluminum
☐ Asbestos – non-friable	☐ Asbestos – friable	☐ Other Radioactive	☐ Air Reactive	☐ Isocyanates
☐ Biodegradable Sorbents	☐ Pyrophoric	☐ Reactive Sulfide	☐ Reactive Cyanide	☐ Explosives
☐ Temperature Controlled Organic Peroxide		☐ NORM	☐ TENORM	

Section 4 – Composition and Generating Process

4.1) Provide a physical and chemical composition of the waste (e.g. soil, water, PPE, debris, etc.). List the percent ranges of the material, either estimated or known.

Sodium hydroxide 20 to 50 % to %

water 50 to 80 % to %

to % to %

4.2) Provide a description of the generating process. *Remediation & IDW Sites: please provide a site history.*
Off-spec, out of date unused material emptied out of holding tanks

4.3) Are there any known previous handling or treatment issues involving this waste? ☐ Yes* ☒ No
*If yes, describe:

Section 5 – Hazardous Wastes

As determined by 40 CFR, Part 261 and State Rules: **Please list applicable waste code(s):**

5.1) Is this waste exempted from RCRA? ☐ Yes, please provide exemption: ☒ No

5.2) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ☐ Yes: ☒ No
a) For F006–F009, F012, does this come from a generator that conducts a cyanide plating process? ☐Yes ☐No

5.3) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ☒ Yes: D002 ☐ No

5.4) Do any State Specific Hazardous Waste Codes apply? ☐ Yes: ☒ No

If you answered 'no' to 5.2, 5.3 and 5.4, please proceed to Section 6.

5.5) EPA Source Code: EPA Form Code:

5.6) Waste Code Determination Is Based On: ☒ Generator Knowledge ☐ Analysis ☐ MSDS
Analysis and/or MSDS may be required for review and approval for hazardous and non-hazardous waste streams.

5.7) Does this waste exceed Land Disposal Restriction levels? ☒ Yes ☐ No

a) Is this stream a wastewater (WW) or non-wastewater (NWW)? ☐ WW ☒ NWW
b) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40CFR 268.49? ☐ Yes ☐ No
c) Does this waste contain greater than 50% debris, by volume? ☐ Yes ☒ No
(Debris is greater than 2.5 inches in size.)
d) If the debris is larger than 3 ft x 3 ft x 3 ft, please provide the approximate dimensions and weight:

5.8) If this is a characteristic hazardous waste, does it contain Underlying Hazardous Constituents? ☐ Yes* ☒ No

*If Yes, please list:

For a complete list of UHC constituents, please refer to 40 CFR 268.48

Section 6 – Non-Hazardous Wastes

Please list applicable waste code(s):

6.1) Do any State Specific Non-Hazardous Waste Codes apply? ☐ Yes ☒ No
6.2) Is this a Universal (UNIV) waste or a Recyclable Good (RG)? ☐ UNIV ☐ RG ☒ N/A
6.3) Is this waste used oil as defined by 40 CFR Part 279? ☐ Yes ☒ No
a) If yes, is the total halogen content of the used oil waste stream greater than 1,000 ppm? ☐ Yes ☐ No
b) If yes, what is the source of the halogen content?
☐ This is a metalworking oil/fluid containing chlorinated paraffins.
☐ This is used oil contaminated with chlorofluorocarbons from refrigeration units.
☐ This oil contains halogenated solvents. List specific solvents:
☐ Other, describe:

Section 7 – TSCA Information

7.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-49 ppm ☐ 50-499 ppm ☐ 500+ ppm
7.2) Does the waste contain PCB contamination from a source with a concentration ≥ 50 ppm? ☐Yes ☒No ☐ Unknown
If you answered "none" or "0-49 ppm"' to 7.1 and "no" to 7.2, please proceed to Section 8.
7.3) Has this waste been processed into a non-liquid form? ☐ Yes* ☐ No
*If yes, what was the concentration of PCBs prior to processing? ☐ 0-499 ppm ☐ 500+ ppm
7.4) Is this non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No
7.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No
7.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ N/A ☐ Yes ☐ No

Section 8 – Clean Air Act Information

8.1) Is this waste subject to regulation under 40 CFR, Part 264, Subpart CC (VOC > 500 ppmw)? ☐ Yes ☒ No
8.2) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD (VOHAP > 500 ppmw)? ☐ Yes ☒ No
8.3) Is the site, or waste, subject to any other NESHAP/MACT standard(s)? ☐ Yes* ☒ No

*If Yes this document serves as notification that this waste contains chemicals , required to be managed in accordance with Part ☐ 61 ☐ 62 ☐ 63 Subpart of NESHAP/MACT standards.

8.4) Does this waste stream contain Benzene? ☐ Yes ☒ No
If you answered "no" to 8.4, please proceed to Section 9.
8.5) Does the waste stream come from a facility subject to 40 CFR 61, Subpart FF (Benzene NESHAP)?
☐ Yes, please provide the SIC/NAICS code: ☐ No
If you answered "no" to questions 8.5, please proceed to Section 9.
8.6) Does your facility manage the waste subject to Benzene NESHAP in a manner other than shipping off-site?
☐ Yes, please specify: ☐ No

8.7) Is the generating source of this waste a facility with Total Annual Benzene (TAB) ≥10 Mg/year? ☐ Yes ☐ No
8.8) Does the waste contain >10% water? ☐ Yes ☐ No
8.9) What is the TAB quantity for your facility? Mg/Year

8.10) What is the total Benzene concentration in your waste? Percent or ppmw.
Supporting analysis must be attached. Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.

Section 9 – Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's personnel to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's personnel to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

If I am an agent acting on behalf of the generator, I also certify that I have permission to sign any and all waste characterization paperwork on the generator's behalf and that I can produce such certification in writing upon request.

Generator Signature [signature] Printed Name William Fowler.
Company QIP Title FAC. MAINT. Manager Date 5/5/2015

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Attachment 3

Facility Photographs

May 7, 2015

Piedmont Regional Office
Ryan Smith

Quality Investment Properties
Richmond, LLC.

EPA ID No. VAR000007534

PHOTOGRAPHIC DOCUMENTATION

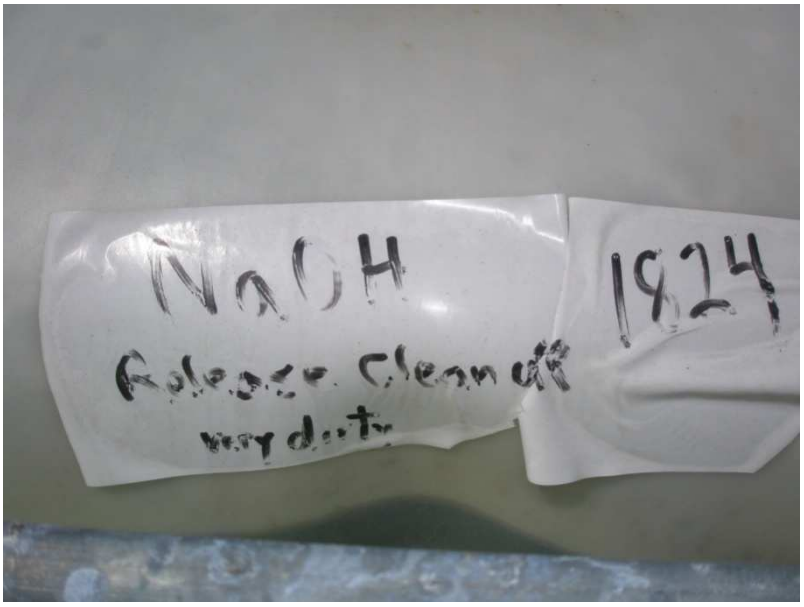
Facility: Quality Investment Properties Richmond, LLC	Compliance Evaluation Inspection	Piedmont Regional Office
EPA ID Number: VAR000007534	May 7, 2015	Ryan Smith

Photograph 1
Date: May 7, 2015
Time: 11:48 AM

Comments: Photograph of the 55-gallon steel drum located in the Industrial Water Treatment Building.

Photograph 2
Date: May 7, 2015
Time: 11:56 AM

Comments: Photograph of the (11) 250-gallon totes to collect product and rinsate from cleaning out the sodium hydroxide tank at the Industrial Water Treatment Building.



Photograph 3
Date: May 7, 2015
Time: 11:56 AM

Comments: Photograph of the label stating "NaOH Release Clean Up very dirty" on one of the (11) 250-gallon totes.

Photograph 4
Date: May 7, 2015
Time: 12:16 AM

Comments: Photograph of the ½ cubic yard container with universal waste lamps.

Photograph 5
Date: May 7, 2015
Time: 12:16 AM

Comments: Photograph of 1 of 4 cubic yard containers of universal waste lamps.

Photograph 6
Date: May 7, 2015
Time: 12:16 AM

Comments: Photograph of 2 of 4 cubic yard containers of universal waste lamps.

Photograph 7
Date: May 7, 2015
Time: 12:16 AM

Comments: Photograph of 3 and 4 of 4 cubic yard containers of universal waste lamps.

Photograph 8
Date: May 7, 2015
Time: 12:16 AM

Comments: Photograph inside the fourth cubic yard container of universal waste lamps.