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May 4, 2017

MAY - 8 2017

Ms. Cheryl Williams
U.S. Environmental Protection Agency
RCRA Enforcement unit, OCE-101
1200 Sixth Avenue, Suite 900
Seattle, Washington, 98101

Re: EPA Notice of Violation – NEIC RCRA Inspection August 10-14, 2015

Dear Ms. Williams,

Equilon Enterprises LLC d/b/a Shell Oil Products US ("Equilon") received the above-referenced Notice of Violation (NOV) on March 22, 2017 pertaining to alleged violations identified during an inspection performed by U.S. Environmental Protection Agency (EPA) Region 8 on August 10-14, 2015, at the Shell Puget Sound Refinery, located at 8505 South Texas Road in Anacortes, Washington. By email dated March 31, 2017, you kindly provided additional time to respond.

The following information is provided pursuant to Section 3007 of RCRA, and as requested in the NOV. By responding to certain factual or legal statements in the NOV, Equilon does not concede the factual accuracy of the allegations in the NOV. Failure to respond to particular statements in the NOV should not be assumed to be agreement by Equilon, and Equilon reserves any and all defenses in the event of enforcement action. Moreover, Equilon specifically denies the allegations regarding Tanks 61, 70, and 71, and 206 of which each tank is a dedicated component of the wastewater treatment plant and covered under Permit by Rule (PBR), per WAC 173-303-802. Additionally, even notwithstanding the wastewater treatment plant exemption (via permit by rule in Washington), wastes from tank bottoms were not legally "generated" until removed from the system, which had not occurred at the time of the 2015 inspection.

The NOV refers to seven distinct violations based off observations during EPA's onsite inspection. Equilon's responses to each of these are provided below.

Violation 1: Failure to make a dangerous waste determination

Tanks 60, 70 and 71 and 206 are fully authorized under the provisions of Permit by Rule (PBR), per Equilon's inclusion of API skimming, Dissolved Nitrogen Floatation (DNF), and emulsion processes and tank information listed in the NPDES Fact Sheet (section H) and the supporting documents in the Effluent Plant Operating Manual Process Overview (section N) - see attachments and compliance by the facility with the terms of PBR at WAC 173-303-802(5) (Totally Enclosed Treatment Facilities or Elementary Neutralization or Wastewater Treatment Units). Tanks 60, 70 and 71 are integral and dedicated parts (hard piped) of the refinery's wastewater treatment facility (WWTF). Tank 206 is located near the Coker and holds DNF prior to processing in the coker. These tanks are not RCRA-regulated hazardous waste storage tanks as are described in the NOV.

DNF processing from the Effluent Plant to the Coker has had a long history at the refinery. Starting in the 1990s, DNF processing was encouraged by the Washington State Department of Ecology as a beneficial reuse activity and a common industry practice. During this time period, a "Sludge Busters Team" was formed to integrate injection of DNF bottoms into the cooling cycle of the Coker (a patented process). As part of this plan, the recycle of DNF sludge was included in the facility's Pollution Prevention Plan.

A decision was later made to discontinue the use of Tank 206 and clean Tanks 61, 70, and 71. Tanks 61, 70, and 71 were cleaned and sludge from tank cleaning was sent off-site for disposal during the August to October timeframe in 2016 (see attached waste manifests).

At the close-out meeting of the RCRA inspection in 2015, EPA did not identify any alleged violations relating to the DNF and Tanks 60, 70, 71 or 206. Upon notification by EPA through the March 22, 2017 NOV of EPA's position that Tank 206 was regulated and contains dangerous waste, Equilon has initiated a plan to remove the contents of this tank (approximately 224 BBL of waste material) and to make arrangements for proper disposal of this material under the conservative assumption that it is regulated dangerous waste. This activity is planned for completion by June 30, 2017.

Violation 2: Accumulation of dangerous waste for greater than 90 days without a permit or interim status.

Tanks 60, 70, 71 and 206 are integral and dedicated parts of the WWTF and are regulated under the Permit by Rule (WAC 173-303-802); therefore they are not hazardous waste storage tanks and are not subject to dangerous waste accumulation limitations.

Violation 2[a]: Failure to label tanks

Tanks 60, 70, 71 and 206 are integral and dedicated parts of the WWTF and are regulated under the Permit by Rule (WAC 173-303-802); therefore labeling these tanks as hazardous waste storage tanks is not applicable.

Violation 3: Failure to develop and follow an inspection schedule

Tanks 60, 70, 71 and 206 are integral and dedicated parts of the WWTF and are regulated under the Permit by Rule (WAC 173-303-802); therefore inspections as hazardous waste storage tanks is not applicable.

Violation 4: Failure to close a satellite accumulation container

Upon discovery of the three unsecured lids with drum rings, the lids were replaced the next day with hinged quick-closure release lids with a latching mechanism to ensure a secure closure (see attached photo).

Violation 5: Failure to properly manage a container of dangerous waste

Containers at PSR are managed in accordance with WAC 173-303-200(1)(b)(i). Container 5429 was determined to be leaking in the weekly inspections. To better facilitate container repair and/or the potential transfer of material in accordance with WAC 173-303-630(2), Container 5429 was transferred to the North Pad. The North Pad has more suitable secondary containment. On August 14, 2015, at the time of the inspection and immediately subsequent to discovery, the contents of Container 5429 were removed and placed into Container 5848. On August 26, 2015, Container 5848 was shipped off-site to Envirogreen Technologies for disposal (see attached manifest).

Violation 6: Failure to have a permit or interim status

The North and South Pads are not used to accumulate dangerous waste but are used to store containers in accordance with WAC 173-303-200(1)(b)(i). Containers are not stored for more than 90 days; therefore, in accordance with WAC 173-303-200(1), no permit is needed.

If you have any questions or require further documentation of the above, please contact Gary Barklind at (360) 293-1563.

Sincerely,

Nathan Biletnikoff
Manager – Environmental

Encl.
cc. Mr. Mark Dirkx

- Discharge Pump Recycle Flow (9FT276)

3. LABORATORY SAMPLING AND TESTING

- Surge Tank return water is measured by operations whenever the basin is being returned to the API. The parameters measured may include:
  - COD
  - Ammonia
  - pH
  - DEA

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N. RECOVERED OIL TANKAGE

The Effluent Plant has 5 recovered oil tanks. The purpose of these tanks is to accumulate skimmings from the API, DNFs, Surge Tanks, and Ballast line. Tanks at the effluent plant have Varec gauging systems that allow for continuous level monitoring. A recovered oil distribution system and transfer pump is used to transfer products from one tank to another, and up to crude oil tankage for reprocessing by the Crude Unit. DNF sludge cannot be processed by the Crude Unit, and is hauled by truck to the Coking Unit for reprocessing. This distribution system also allows for the tanks to perform sparing duty with each other when one tank is out.

1. TANK 60, BALLAST WATER TANK

Should ballast water be received from crude oil and product tankers is temporarily stored in Tank 60. The tank also receives water recirculated from the final pond and through the ballast line for freeze protection. The ballast tank is 21 feet high, 40 feet diameter and has a capacity of approximately 27,000 barrels. The main flow from the ballast water line enters the tank at the bottom through a 12" lines.

The ballast water is pumped through the 16" ballast water line that discharges to Tank 60 or to the API. Two remote automatic pumps are sources of discharge to the ballast line and Tank 60. The sources include:

1) The wharf head collection system, that collects any oil in the wharf sumps and general wharf drainage,
2) A pump in the containment sump collects drainage from the northwest corner of the refinery property,

Ballast water may contain significant amounts of oil and other petroleum related contaminants. Specific recommendations for bringing ballast water back to the treatment system are outlined in the 'Effluent Plant Operator's Handbook'. Tank 60 may also be used to spare Tank 62 in API skim service.

2. TANK 61, DNF FLOAT

Tank 61 is 16 feet high, 40 feet in diameter and holds 3,800 barrels. It receives skimmed oil and float from the Dissolved Nitrogen Flotation (DNF) Units. Tank 61 is equipped with an internal floating roof for volatile organic emissions and odor control.

The oil and water layer separate more easily than the API skimmed oils because the polymer used in the DNF will remain in the oil and be carried to the tank. This reduces the amount of emulsions in the tank. The water in the tank will be drained from the bottom and flow to the surge basin through a drain.

3. TANK 62, API SKIM OIL

Tank 62 is 31 feet high, 50 feet in diameter and holds 10,800 barrels. This tank is equipped with an internal floating roof to control volatile organic emissions and odors. Tank 62 can be used as a spare to Tank 70, the emulsion-breaking tank.

Tank 71 is primarily used to collect the skimmed oils from the API Separator. It may be used in a rotation with Tank 62 to allow more capacity and time for separation of oil and water. This tank has an internal floating roof with a metallic shoe mounted secondary seal. Oil in the tanks is normally heat treated and then pumped to the refinery for processing.

Oil, emulsion and water will settle in three layers in order from top to bottom. Heating coils will be used to help break up the emulsion layer to allow for better quality-recovered oil. Emulsions can be drawn from the tank using the swing line and Pump G-50 for pumping to Tank 70, the emulsion-breaking tank. A water draw valve at the base of the tank can draw off water to the surge sump. Oil can be pumped back to the refinery using the desired tank's multi-level suction line and the Recovered Oil Pump.

4. TANK 70, EMULSION BREAKING

Tank 70 is the emulsion breaker tank and can spare tank 61. It is 40 feet high, 28 feet in diameter, holds 4,300 barrels, and has an internal floating roof for VOC emissions and odor control. Tank 70 is equipped with pipe-coil heaters evenly distributed across the bottom of the tank to aid in emulsion breaking. Emulsions are a mixture of oil and water that does not easily separate. To break an emulsion the first step is to apply heat. Typically this will result in a clean break of the oil and water. It is important that the tank not be heated above 180 degrees

5. TANK 71, TRANSFER TANK

Tank 71 is primarily used to collect the skimmed oils from the DNF Units before transfer to the DCU. This tank has an internal floating roof with a metallic shoe mounted secondary seal.

6. RECOVERED OIL TRANSFER PUMP AND MANIFOLD SYSTEM

Recovered oil may be pumped from one tank to another using the Recovered Oil Transfer Pump. This pump may take suction on all five tanks (60, 61, 62, 70 and 71), the Surge Tank Skim Lines, the API skim sump, and can discharge to any of the five tanks. The Transfer Pump may also be sued to pump to the slop oil line that returns recovered oil to the refinery.

O. EFFLUENT PLANT HISTORY

The Effluent Wastewater Treatment Facility at Puget Sound Plant was originally constructed in 1958 prior to start-up of the refinery. The original Effluent Plant consisted of the following units:

API Oil Water Separators, with two bays
Two Primary Clarifiers
Trickling Filter, rock packing
Two Aerator Clarifiers
Two Retention Ponds
Clean Water Flume
Storage Pond
Overflow Basin
Ballast Tank
Slop-Oil Tank
Emulsion Breaking Tank
Precoat Filter
Incinerator

A number of modifications and upgrades of the Effluent Plant have been completed since the facility was opened in 1958. Following is a brief summary of some of the more significant changes.

In about 1960, the Precoat Filter was removed and the use of the Incinerator was discontinued due to operating problems and poor combustion of the filter cake. Also, in 1960, use of the Clarifiers was discontinued since the quality of the effluent water was not improved by the use of the Clarifiers. Chlorination facilities were installed to disinfect the water prior to discharging.

Mr. Rob Short
Managing Director
Tetra Process Services, L.C.
2204 Timberloch Place, Suite 270
The Woodlands, TX 77380

Dear Mr. Short,

Thank you for your letter dated February 8, 2002 in which you posed twelve detailed questions concerning the regulatory status of oil-bearing hazardous secondary materials under the Resource Conservation and Recovery Act (RCRA). Specifically, you requested clarification on numerous aspects of the exclusion at 40 CFR section 261.4(a)(12)(i), which was promulgated in the August 6, 1998 *Federal Register* (63 *FR* 42110). I apologize for the delay in responding to your questions. Because of the variety and detail of your questions, I have chosen to enclose, as separate document, each of your questions along with our corresponding response.

I would like to reiterate that under Section 3006 of RCRA (42 U.S.C. Section 6926), individual States can be authorized to administer and enforce their own hazardous waste programs in lieu of the federal program. Please also note that under Section 3009 of RCRA (42 U.S.C. Section 6929) States retain authority to promulgate regulatory requirements that are more stringent than federal regulatory requirements. While I have tried to provide general guidance on the RCRA program for the issues you raised in your letter, I recommend that you consult the agency implementing the authorized RCRA subtitle C program in the state where your specific facility or activity is located to help determine the status of the waste stream in question.

Finally, let me clarify that in your questions you use the term "residuals" to describe materials that may be eligible for the exclusion at 261.4(a)(12)(i). I refer to these materials as "oil-bearing hazardous secondary materials" in my responses, consistent with the language of that regulation. I use the term "residuals" to describe any materials that are not ultimately inserted into the refining process, and are discarded. If you have any further questions, please contact Ross Elliott of my staff at 703-308-8748.

Sincerely yours,

Robert Springer, Director
Office of Solid Waste

Enclosure

RO 14677

ENCLOSURE

Questions from Mr. Rob Short, Tetra Services, L.C., February 8, 2002 and Answers from the Environmental Protection Agency, Office of Solid Waste

Tetra is requesting written clarification from the EPA regarding issues identified within the following sections of this correspondence. The identified issues address the regulatory status of Residuals which are managed, transferred, stored, and processed under the conditions of the Exclusion. The identified issues also address the regulatory status of equipment used to manage, transfer, store, and process Residuals under the conditions of the Exclusion.

Issues Regarding the Management of Residuals Under the Exclusion

1. What Residuals Qualify Under the Exclusion? - *It is Tetra's interpretation that the Exclusion is applicable to all Residuals (i.e., sludges, by-products, or spent materials) that result from a petroleum refining operations (SIC code 2911) and are to be inserted into the petroleum refining process (SIC code 2911). Applicability of the Exclusion extends to Residuals which exhibit a hazardous characteristic (e.g., D018) and Residuals which are listed under subpart D of RCRA (e.g., F037, F038, K048 - K052, and K169 - K172). However, the Exclusion is limited to Residuals resulting from petroleum refining operations (SIC code 2911).*

Answer: First, your question describes the exclusion at 40 CFR 261.4(a)(12)(i) as applying to "all residuals" from petroleum refining operations; a more accurate statement is that the exclusion applies to *oil-bearing hazardous secondary materials* that are generated from petroleum refining operations *and* that can be legitimately recycled at a petroleum refinery, under the conditions set out in the exclusion. In the final rule published in the August 6, 1998 *Federal Register* (63 *FR* 42110), while we did not specify a minimum oil content for these oil-bearing hazardous secondary materials, we did stress that there must be some recoverable amount of hydrocarbons to make the recycling legitimate. (See also answer to Question 12 below).

Regarding the types of oil-bearing hazardous secondary materials to which the exclusion applies, generally it does not matter whether the materials are hazardous because they are listed in 40 CFR, Part 261, subpart D, or because they exhibit a hazardous characteristic under Part 261, Subpart C. The exclusion applies to oil-bearing *hazardous* secondary materials, irrespective of whether they are listed or exhibit a hazardous characteristic. Of course, certain residuals from recycling (that are discarded) may be regulated differently depending upon whether the initial material met a listing, versus exhibited a characteristic (*e.g.*, see answer to Question 2 below regarding use of the F037 code).

Finally, I note that you have included the waste codes K171 and K172 in your question, corresponding to the spent hydrotreating (K171) and hydrorefining (K172) petroleum catalysts, indicating that these particular wastes might be recycled under the exclusion in 40 CFR 261.4(a)(12)(i). We discussed the recycling of these catalysts a great deal in the proposed and

final rules[1]. However, we did not specifically discuss recycling these two listed spent catalysts as "oil-bearing hazardous secondary materials" under 261.4(a)(12)(i)[2], beyond stating in the preamble that this exclusion can apply to "..any oil-bearing material generated at a petroleum refinery, including oil-bearing wastes currently regulated as listed hazardous wastes (e.g., K048–K051), and including refinery wastes newly listed under today's rulemaking that are suitable for insertion into normal petroleum refining operations." 63 *FR* at 42118. Therefore, I would make the following clarification.

First, if petroleum catalysts are removed from one particular refining process, but still can be used elsewhere in the refining process for continued use as a catalyst, then these materials are not wastes, irrespective of the exclusion at 261.4(a)(12)(i). Second, where the catalysts are spent and removed from the refining process either for disposal or recycling, but oil is first recovered and inserted back into the refining process, this oil can be considered a "recovered oil" (see 40 CFR 261.4(a)(12)(ii)) and is excluded from the definition of solid waste (although the spent catalyst retains its original waste code, K171 or K172). Finally, the exclusion at 40 CFR 261.4(a)(12)(i) does not preclude a refinery owner/operator from viewing the entire spent catalyst as an "oil-bearing hazardous secondary material," in those situations where some type of processing (as discussed in response to Question 2 below) yields material that is inserted into the refining process (e.g., oil), and where the remaining material is discarded (in this case, as F037 per this exclusion).

Let me note that the record supporting the August 6, 1998 rulemaking reflects the fact that in many instances, oil is *added to,* not *recovered from*, spent petroleum catalysts, in order to reduce the pyrophoric (self-heating) nature of these wastes. 63 *FR* at 42157. Therefore, I stress that the recycling must be legitimate in all instances under all of the scenarios described above. Furthermore, under 261.4(a)(12)(i), I believe it is unlikely that a refinery would insert bulk spent catalyst into a refining process such as a distillation unit or a petroleum coker, for the purpose of oil recovery, due to obvious technical limitations. In the example of the coker, such insertion could also significantly degrade coke quality, a possible indication of sham recycling. 63 *FR* at 42125. However, because there still may be situations where hydrocarbons can be legitimately recovered either from spent petroleum refining catalyst, or other oil-bearing material that contains spent petroleum refining catalyst, the exclusion at 261.4(a)(12)(i) could be applied. An example might be where the catalyst is subjected to some preprocessing steps, after which the oil is returned to petroleum refining process for further refining. I also note that my office presently

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[1]See 63 *FR* at 42116. See also numerous comment responses regarding catalyst recycling issues in *Petroleum Refining Listing Determination, Proposed Rule Response to Comment Document, Part IV*, June 1998.

[2]Several types of catalyst recycling were discussed in this rulemaking: 1) reclamation ('regeneration') of spent petroleum catalysts for reuse as catalysts; 2) reclamation of metals from spent catalysts, such as vanadium; and 3) a national variance from the definition of solid waste for partially-reclaimed metals from the metals recovery process.

is reviewing a petition for rulemaking on issues that may impact how this exclusion is applied to spent catalysts, particularly with regard to the classification of spent catalyst that meets the K171 or K172 listing description, but could be reclassified as F037 should the generator apply the exclusion described above. Any future action the Agency proposes to take on this matter will be duly noticed to the public.

2. Is the Exclusion Applicable to Residuals Requiring Processing Prior to Insertion into the Petroleum Refining Process? - *It is Tetra's interpretation that the Exclusion is applicable to all Residuals (i.e., sludges, by-products, or spent materials), including Residuals that require processing or reclamation prior to insertion of the entire Residual or a reclaimed portion of the Residual, into the petroleum refining process.*

Answer: The Agency has acknowledged that some oil-bearing hazardous secondary materials cannot be directly inserted into particular petroleum refining processes, and therefore may require some type of processing or preparation beforehand (*e.g.*, centrifugation, desorption, settling, etc.). 63 *FR* at 42113-42114, 42128. We generally view these activities as part of normal petroleum refining activities. During the rulemaking, we were particularly concerned with the management of any discarded residuals generated from the processing of oil-bearing hazardous secondary materials, and thus developed an approach to ensure that these discarded residuals continue to be managed appropriately. In responding to public comments when the exclusion was promulgated, we said:

> "In the final rule, EPA clarifies that the exclusion for oil-bearing secondary materials returned to the refining process only extends to the materials actually re-inserted into the refinery process. In cases where oil-bearing secondary materials are reclaimed prior to re-insertion, any residuals that may result from the reclamation process and that are not returned to the refinery process retain the hazardous waste listing and must be managed as hazardous wastes. In the final rule, the Agency is modifying the descriptions for the F037 waste code to include any residuals from the processing of listed (refinery) hazardous wastes."[3]

The language above was intended to clarify that residuals that are not ultimately inserted are not excluded, and that these discarded residuals are classified as F037 if the original oil-bearing hazardous secondary material was a listed hazardous waste. I would emphasize that the exclusion applies to the oil-bearing hazardous secondary materials from the point they are generated, even though some preprocessing may be required before insertion, and even if this preprocessing generates residuals that are not inserted (and are thus not excluded under this provision).

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[3]Section II.B.2., Notice of Data Availability (NODA), Response to Comment Document, Part II, June 1998.

3. Are Residuals Qualifying Under the Exclusion, Considered Generated Wastes? - *It is Tetra's interpretation that the Exclusion, similar to other exclusions under 40 CFR 261.4, eliminates the "point-of-generation" for qualifying Residuals. Therefore, a Residual which is managed under the conditions of the Exclusion is never "generated," and is exempt from the definition of solid waste.*

Answer: The exclusion from the definition of solid waste for oil-bearing hazardous secondary materials under 40 CFR 261.4(a)(12)(i) applies at the point the material in question is first generated, and continues to apply provided the conditions set out in the exclusion are met. If the applicable conditions are satisfied, we agree that the secondary material was never a solid waste for the purposes of RCRA subtitle C. As stated above in the answer to Question 2, the exclusion applies to the oil-bearing hazardous secondary materials from the point they are generated, even though some preparation or processing may be required before insertion. Also, any residuals from this processing that are not inserted are not excluded, and would be classified as F037 (if the original oil-bearing hazardous secondary material was also a listed hazardous waste).

4. Does the Point of Insertion Into the Petroleum Refining Process Influence the Ability of a Residual to Qualify Under the Exclusion? - *It is Tetra's interpretation that the Exclusion places no limitations on location in the petroleum refining process in which a qualifying Residual can be inserted. The point of insertion has no bearing on the ability of a Residual to qualify under the Exclusion.*

Answer: While the language in 40 CFR 261.4(a)(12)(i) does not set out specific 'limitations' on the point of insertion into the petroleum refining process for an oil-bearing hazardous secondary material, there are some implicit limitations. As discussed in the preamble to the August 6, 1998 *Federal Register*, the recycling of oil-bearing materials under this exclusion must be legitimate. 63 *FR* at 42121, 42125, 42127. Therefore, the point of insertion into the petroleum refining process must be consistent with the type of oil-bearing materials being recycled, such that legitimate recovery of hydrocarbons in an ongoing production process is occurring. Put another way, the oil-bearing hazardous secondary materials must be "suitable for insertion into normal petroleum refining operations." 63 *FR* at 42118.

Issues Regarding the Transfer of Residuals Under the Exclusion

5. Can Qualifying Residuals be Transferred Under the Exclusion? - *It is Tetra's interpretation that the transfer of qualifying Residuals is allowed between petroleum refineries (SIC Code 2911). However, the transfer of Residuals can not involve the use of intermediate "non-refinery" facilities (non-SIC code 2911 facilities). Such transfer is not limited beyond the ability of the petroleum refineries to demonstrate that the Residuals are not being accumulated speculatively or managed under conditions constituting land placement prior to insertion into the petroleum refinery process. In addition, such transfer can be conducted between co-owned petroleum refineries (intra-company transfer) and non co-owned petroleum refineries (inter-company transfer).*

Based on the same considerations, there appears to be no limitation imposed by the Exclusion regarding the number of times a Residual is transferred on-site or between petroleum refineries (SIC code 2911), as long as it can be demonstrated that such transfers are being conducted within the realm of on-going production in the petroleum refining process.

Answer: The specific language of 40 CFR 261.4(a)(12)(i) regarding the 'transfers' you describe, reads:

> "Oil-bearing hazardous secondary materials may be inserted into the same petroleum refinery where they are generated, or sent *directly* to another petroleum refinery, and still be excluded under this provision." [emphasis added]

The term "directly" is further described in the preamble to the August 6, 1998 final rule where we stated:

> "The Agency is also requiring that the materials excluded under this provision of today's rule be returned directly to a refinery for insertion. While this is not an issue if materials are recycled onsite, EPA has concerns...about situations where these materials are generated at one refinery for insertion into another, but are not directly sent and instead are sent to an intermediate non-refinery facility for processing." 63 *FR* at 42126-7.

There is no requirement or limitation under 261.4(a)(12)(i) regarding the ownership of either the petroleum refinery where the hazardous secondary materials are generated, or the refinery to which these materials are transferred. Such transfers may occur within the same company, or between companies, without affecting the applicability of this exclusion.

You are also correct that 261.4(a)(12)(i) does not place any specific limit on the number of transfers that may occur under this exclusion. However, the recycling must be *legitimate* in order for the exclusion to apply. Numerous transfers of the same hazardous secondary material, particularly where no hydrocarbon has yet been recovered, should raise concerns as to whether such transfers represent legitimate recycling (*i.e.*, ongoing manufacturing). In addition, numerous transfers could make it more difficult for the generator to demonstrate that the material is not being speculatively accumulated. In responding to comments regarding the speculative accumulation condition in 40 CFR 261.4(a)(12)(i), we stated:

> "Under section 261.2 (f), persons storing excluded materials have the burden of demonstrating (in an enforcement action) that they are meeting the terms of the exclusion. Refineries consequently must be able to demonstrate the duration of storage of all secondary materials which are excluded (including, but not limited to, those processed by quench coking). The rule does not specify a particular record-keeping regime in order to provide flexibility for each facility to be able to demonstrate that there is no speculative accumulation in a manner best fitting the facility's operating practices."[4]

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[4]Section II.B.2.d., Notice of Data Availability (NODA) Response To Comment Document, Part II, June 1998

6. What Types of Notification and Record-Keeping are Required for Off-Site Transfer of Residuals Under the Exclusion? - *It is Tetra's interpretation, that Residuals qualifying under the Exclusion are not considered solid wastes, and are excluded from the definition of solid waste at the "point-of-generation." Based on these conditions, Residuals are considered an intermediate product or feedstock material within the petroleum refining sector (SIC Code 2911) and do not require manifesting under RCRA regulations. However, Residuals transferred within the "petroleum refining sector," require conventional bills of lading, and shipments must comply with applicable state regulatory requirements and Department of Transportation regulations, which may include recordkeeping, specific authorized packing, and placarding.*

Answer: You are correct that materials excluded under 40 CFR 261.4(a)(12)(i) are not solid wastes, for purposes of subtitle C regulation, and therefore are not (by definition) hazardous wastes from the point of generation. Therefore, requirements that normally apply to the management of hazardous wastes, such as notification or the use of a hazardous waste manifest, do not apply to these materials, provided the conditions of the exclusion are satisfied. As noted above in the answer to Question 5, under 40 CFR 261.2(f) certain documentation would be necessary to demonstrate that the conditions of an exclusion have been met.

Issues Involving the Storage of Residuals Under the Exclusion

7. Can Residuals Qualifying Under the Exclusion be Stored Beyond 90-days? - *It is Tetra's interpretation of the Exclusion, that 90-day storage requirements are not applicable to qualifying Residuals. Residuals qualifying under the Exclusion are exempt from the definition of solid waste. Therefore, 90-day storage requirements do not apply to Residuals, provided the Residuals are not accumulated speculatively or managed under conditions constituting land placement prior to insertion into the petroleum refining process.*

Answer: You are correct that materials excluded under 40 CFR 261.4(a)(12)(i) are not solid wastes, for purposes of subtitle C regulation, and therefore are not (by definition) hazardous wastes from the point of generation. Therefore, requirements that normally apply to the management of hazardous waste, such as the 90-day storage requirements in 40 CFR 262.34, do not apply to these materials, provided the conditions of the exclusion are satisfied.

8. What is the Regulatory Status of Residuals Stored Prior to Processing for Insertion into the Petroleum Refining Process? - *It is Tetra's interpretation that the Exclusion is applicable to all Residuals (i.e., sludges, by-products, or spent materials), including Residuals that require processing or reclamation prior to the insertion of the entire Residual, or a reclaimed portion of the Residual, into the petroleum refining process. Therefore, Residuals which require processing or reclamation, are exempt from the definition of solid waste under the Exclusion. Obviously, storage is probable when processing or reclamation activities are conducted. The storage of such Residuals, prior to processing or reclamation, does not alter the regulatory status of those Residuals, provided the Residuals are not accumulated speculatively or managed under conditions constituting land placement.*

Answer: The storage you reference of the excluded materials prior to either direct insertion, or prior to some processing prior to insertion, into the petroleum refining process would not be subject to regulation under subtitle C, provided the conditions of the exclusion are met. As discussed above in response to Question 2, we acknowledged that some oil-bearing hazardous secondary materials may be unsuitable for direct insertion, and therefore may require some processing prior to insertion into the petroleum refining process. Therefore, because materials that are excluded under 40 CFR 261.4(a)(12)(i) are not solid wastes for purposes of subtitle C regulation from the point of generation (see answer to Question 3 above), storage of these materials is not regulated under subtitle C irrespective of whether or not some degree of centrifuging, filtering, or other processing has to occur prior to insertion into the petroleum refining process.

9. What is the Regulatory Status of Tanks and Containers Used to Store Residuals Qualifying Under the Exclusion? - *It is Tetra's interpretation that the Exclusion is applicable to all Residuals, including Residuals that require processing or reclamation prior to the insertion of the entire Residual, or a reclaimed portion of the Residual, into the petroleum refining process. Such Residuals are exempt from the definition of solid waste under the Exclusion, and the storage of such Residuals is not regulated under RCRA. Based on these considerations, tanks used to store Residuals qualifying under the Exclusion are not regulated under RCRA, provided the Residuals are not accumulated speculatively or managed under conditions constituting land placement.*

Answer: That is correct. Tanks and containers used to store oil-bearing hazardous secondary materials qualifying under the exclusion are not regulated under RCRA because these materials are not solid wastes, and therefore are not hazardous wastes, provided the conditions of the exclusion are being met.

Issues Involving the Processing of Residuals Under the Exclusion

10. What is the Regulatory Status of Equipment Used to Process Residuals for Insertion Under the Exclusion? - *It is Tetra's interpretation that the Exclusion is applicable to all Residuals, including Residuals that undergo processing or reclamation prior to the insertion of the entire Residual following processing or a recovered portion of the residual following reclamation into the petroleum refining process. In general, a Residual qualifies under the Exclusion based on the intent of inserting either the entire Residual or a portion of the Residual into the petroleum refining process (SIC code 2911), provided the Residual is not speculatively accumulated or managed under conditions constituting land placement. Under the Exclusion, the Residuals would not be considered solid waste, therefore the equipment used to conduct processing or reclamation of the Residual would not be regulated under RCRA.*

Answer: Oil-bearing hazardous secondary materials that are excluded from the definition of solid waste are not hazardous wastes; therefore, the management of these excluded materials (including management in equipment used to process the oil-bearing hazardous secondary materials for insertion) is not subject to the hazardous waste requirements. However, it is

possible that residual materials may be generated during the reclamation process, which will be disposed, and where these wastes meet the definition of hazardous waste, the applicable hazardous waste requirements must be followed regarding their management.

Also, where oil-bearing hazardous secondary materials are excluded because they are being recycled under 261.4(a)(12)(i), they are viewed as in-process materials in a manufacturing process. Therefore, under 40 CFR 261.4(c), if the equipment that is processing these oil-bearing hazardous secondary materials ceases to be operated, the materials in the unit could become subject to regulation if they remain in the unit for more than ninety days, and the unit in turn may become a waste management unit. (This is a longstanding regulation applicable to situations where a hazardous waste is generated in a manufacturing process unit, and where the waste remains in the unit more than ninety days after the unit "ceases to be operated for manufacturing.") See the November 20, 1995 *Federal Register*; 60 *FR* at 57779-80.

11. Is the Exclusion Applicable to Residuals Processed by Contracted Services Prior to Insertion into the Petroleum Refining Process? - *It is Tetra's interpretation that the Exclusion is applicable to all Residuals, including Residuals that undergo processing or reclamation prior to the insertion of the Residual, or a reclaimed portion of the Residual, into the petroleum refining process. There appears to be no condition imposed by the Exclusion, which restricts the ownership of equipment used to process or reclaim Residuals, as long as such processing or reclamation is conducted on-site at petroleum refining facilities (SIC code 2911).*

Answer: That is correct. The exclusion at 261.4(a)(12)(i) specifies that the oil-bearing hazardous secondary material must be generated at a petroleum refinery, and be inserted into a petroleum refinery, without regard to ownership of either the petroleum refinery or the specific reclamation units or processes located at the petroleum refinery. EPA did clarify, however, that the excluded material being sent from one refinery to another cannot be processed at an intermediate, third party, non-petroleum refinery facility prior to ultimately being inserted into a refining process at a petroleum refinery. In preamble to the August 6, 1998 *Federal Register*, EPA clarified the term "directly" as it is used in the following regulatory text: "Oil-bearing hazardous secondary materials may be inserted into the same petroleum refinery where they are generated, or sent *directly* to another petroleum refinery, and still be excluded under this provision." [emphasis added.] EPA stated that the materials to be recycled must be sent directly to a petroleum refinery in order to be excluded, and cannot be sent to an intermediate non-refinery facility for processing. (63 *FR* at 42126). See answer to Question 5 above; see also the Agency response beginning on Page II-62, *Petroleum Refining Listing Determination Proposed Rule Response to Comment Document, Part I, June 1998.*

12. <u>Does the Oil Content of a Residual Influence the Applicability of the Exclusion</u>? - *It is Tetra's interpretation that the applicability of the Exclusion is not influenced by the oil content of a Residual. Tetra's interpretation is supported by the EPA's dismissal of comments proposing limits to the Exclusions applicability, based on oil content of Residuals and the recovery efficiency of the petroleum refining process.*

<u>Answer:</u> I disagree with your statement that the applicability of the exclusion is "not influenced by the oil content of a residual," where such a statement suggests that there can be hazardous secondary materials generated at a refinery with *zero* oil content, that would be eligible for this exclusion. While it is true that EPA expressly chose not to specify a *minimum* oil content as a condition in the exclusion, we did state in the preamble to the final rule that there had to be *some* oil recovery. Specifically, we said

> "...the Agency believes it is fundamental to this exclusion that there actually be oil recovered for further refining when these oil-bearing hazardous secondary materials are used in the quenching process. To the extent there is no recovery, or drastically inefficient recovery, the operation could be a type of sham recycling, as discussed earlier." 63 *FR* at 42127.

The rationale for EPA choosing not to establish either a minimum oil content condition, or a "recovery efficiency" requirement, is discussed on the same page of the *Federal Register* cited above, and in the comment response document entitled Notice of Data Availability (NODA) Response to Comment Document Part II, June 1998 (prepared as part of the final rule supporting documents.)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WAD000276197
2. Page 1 of 1
3. Emergency Response Phone: 1-877-242-7400 - Spill
4. Manifest Tracking Number: 009900475 FLE

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone:

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
9696 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name: MP Environmental
U.S. EPA ID Number: CAT000612247

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
Envirogreen Technologies
Sinclco Lots Lot 41
Richmond, BC V6X1W0
Facility's Phone:
U.S. EPA ID Number: PSD13075 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	21910	P	K054
	2. Ticket # 54211 Gr 27120					
	3. Tare - 17680 Net - 9440					
	4.					

14. Special Handling Instructions and Additional Information
Bin: # 6798
Profile: N/A

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurat
marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international a
Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Conser
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am

Generator's/Offeror's Printed/Typed Name: Gary Barklind
Signature:

16. International Shipments ☐ Import to U.S. ☒ Export from U.S.
Transporter signature (for exports only): 8/31

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: JASON T ROUSOU JR
Signature
Month 08 Day 31 Year 16

Transporter 2 Printed/Typed Name
Signature
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: M. Tenhumaki
Signature: M Tenhumaki
Month 08 Day 31 Year 16

GENERATOR / INT'L / TRANSPORTER / DESIGNATED FACILITY

WASTE MANIFESTS FOR TANK CLEANING TK 61, 70, AND 71

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WAD009276197
2. Page 1 of 1
3. Emergency Response Phone: 1-877-242-7400 - Spill
4. Manifest Tracking Number: 009900473 FLE

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 360-293-0800

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
8505 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name: [illegible]
U.S. EPA ID Number:

7. Transporter 2 Company Name: [illegible]
U.S. EPA ID Number: [illegible]

8. Designated Facility Name and Site Address
Envirogreen Technologies
Similco Lab Lot 41
Facility's Phone: BC VOX1W0
U.S. EPA ID Number: PSI3076 (02)

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	25,260	P	H061
	2. Ticket # 54176 Gr - 28630					
	3. Tare - 17900 Net - 10730					
	4.					

14. Special Handling Instructions and Additional Information
Bin: #6686
Profile: N/A
Bin VOC (ppm): <500
Trans PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklund
Signature: [illegible]
Month Day Year: 08 30 16

16. International Shipments ☐ Import to U.S. ☒ Export from U.S. Port of entry/exit: SUMAS/HUNTINGDON, B.C.
Transporter signature (for exports only): [illegible] 8/30 Date leaving U.S.: 08/30/16

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: JASON TROMSON JR
Signature: [illegible]
Month Day Year: 08 30 16
Transporter 2 Printed/Typed Name:
Signature:
Month Day Year:

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: M. Tenhunnala
Signature: [illegible]
Month Day Year: 08 30 16

GENERATOR | INT'L | TRANSPORTER | DESIGNATED FACILITY

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DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: [illegible]
2. Page 1 of: 1
3. Emergency Response Phone: 1-877-242-7400 - Spill
4. Manifest Tracking Number: 009900472 FLE

5. Generator's Name and Mailing Address: Equilon Enterprises, LLC, dba Shell Oil Products US, PO Box 622, Anacortes, WA 98221

Generator's Site Address (if different than mailing address): Equilon Enterprises, LLC, dba Shell Oil Products US, 8506 S Texas Road, Anacortes, WA 98221

Generator's Phone: [illegible]

6. Transporter 1 Company Name: [illegible] — U.S. EPA ID Number:

7. Transporter 2 Company Name: — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Envirogreen Technologies, Simico Lots Lot 41, Delta, BC V0X1W0

Facility's Phone: (604) 940-5339 — U.S. EPA ID Number: P313076 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	~~26660~~ GR	P	~~K061~~
	2. Ticket# 54156 Gr- 29110 Tare- 18980 Net- 10130			22290		
	3.					
	4.					

14. Special Handling Instructions and Additional Information

Bin: #6851 — Bin VOC (ppm): < 500

Profile: N/A — Trans PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklind — Signature: [signature] — Month 08 Day 26 Year 16

16. International Shipments: ☐ Import to U.S. ☒ Export from U.S. — Port of entry/exit: Sumas / Huntingdon

Transporter signature (for exports only): [signature] — Date leaving U.S.: 8/26/16

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Ryan Raitz — Signature: [signature] — Month 08 Day 26 Year 16

Transporter 2 Printed/Typed Name: — Signature: — Month Day Year

18. Discrepancy

18a. Discrepancy Indication Space: ☒ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Quantity changed by Gary Barklind 9/15/16 — Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: M. Tenhumak — Signature: [signature] — Month 08 Day 26 Year 16

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

680

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number:
2. Page 1 of
3. Emergency Response Phone: 1-877-242-7450 - Spill
4. Manifest Tracking Number: 009900471 FLE

5. Generator's Name and Mailing Address: Equilon Enterprises, LLC, dba Shell Oil Products US, PO Box 622, Anacortes, WA 98221

Generator's Site Address (if different than mailing address): Equilon Enterprises, LLC, dba Shell Oil Products US, 8605 S Texas Road, Anacortes, WA 98221

Generator's Phone:

6. Transporter 1 Company Name: U.S. EPA ID Number:

7. Transporter 2 Company Name: U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Envirogreen Technologies, Surface Lake Lot 41, Vancouver, BC V0X1W0

U.S. EPA ID Number: PS13076 (02)

Facility's Phone:

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Studies), 9, PG III	1	CM	23980	P	
	2. Ticket # 54149 Gr - 27920					
	3. Tare - 17500 Net - 10420					
	4.					

14. Special Handling Instructions and Additional Information

Bin: # 6675

Bin VOC (ppm): <500

Profile: N/A

Trans PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklund — Signature: — Month 09 Day 25 Year 16

16. International Shipments: ☐ Import to U.S. ☒ Export from U.S. Port of entry/exit: Sumas / Huntingdon

Transporter signature (for exports only): Date leaving U.S.: 8/25/16

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Ryan Raitz — Signature: — Month 8 Day 25 Year 16

Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy

18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: M. Tenhumaki — Signature: M. Tenhumaki — Month 08 Day 25 Year 16

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

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DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

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Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: [illegible]
2. Page 1 of 1
3. Emergency Response Phone: 1-877-242-7400 - Spill
4. Manifest Tracking Number: 009900470 FLE

5. Generator's Name and Mailing Address: Equilon Enterprises, LLC, dba Shell Oil Products US, PO BOX 822, Anacortes, WA 98221

Generator's Site Address (if different than mailing address): Equilon Enterprises, LLC, dba Shell Oil Products US, 5506 S Texas Road, Anacortes, WA 98221

Generator's Phone: [illegible]

6. Transporter 1 Company Name: MB Environmental, 800-293-0503 — U.S. EPA ID Number: [illegible]

7. Transporter 2 Company Name — U.S. EPA ID Number: [illegible]

8. Designated Facility Name and Site Address: Envirogreen Technologies, Similco Lain Lot 41, Trail, BC V0X1W0, (250) 368-5331 — U.S. EPA ID Number: P313075 (02)

Facility's Phone:

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	24,500	P	~~K051~~
	2. Ticket # 54150					
	3. Gr. - 28280 Tare - 17560 Net - 10720					
	4.					

14. Special Handling Instructions and Additional Information

Bin: #6852

Profile: N/A

Bin VOC (ppm): <500

Trans PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklund — Signature: [signature] — Month 08 Day 25 Year 16

16. International Shipments: ☐ Import to U.S. ☒ Export from U.S. — Port of entry/exit: Huntingdon B.C.

Transporter signature (for exports only): [signature] — Date leaving U.S.: 8-25-16

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Austin Gullidge — Signature: [signature] — Month 08 Day 25 Year 16

Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy

18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: M. Tenhuniala — Signature: [signature] — Month 08 Day 25 Year 16

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

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DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number

2. Page 1 of

3. Emergency Response Phone: 1-877-242-7400 - Spill

4. Manifest Tracking Number: 009900469 FLE

5. Generator's Name and Mailing Address: WAD005279197

Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 532, Anacortes, WA 98221

Generator's Phone: 1-203-0640

Generator's Site Address (if different than mailing address)

Equilon Enterprises, LLC,
dba Shell Oil Products US
8605 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name: U.S. EPA ID Number

7. Transporter 2 Company Name: U.S. EPA ID Number: WA2247

8. Designated Facility Name and Site Address: U.S. EPA ID Number

Envirogreen Technologies
Simico Lola Lot 41
Facility's Phone: EC VOXNO

P313076 (02)

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	24,788	P	H061
	2. Ticket 54142 Gr 28420 Tare 17560 Net 10860					
	3.					
	4.					

14. Special Handling Instructions and Additional Information

Bin: 46820

Profile: N/A

Bin VOC (ppm): < 500

Trans PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklind | Signature | Month 08 Day 24 Year 16

16. International Shipments: ☐ Import to U.S. ☒ Export from U.S. Port of entry/exit: Blaine, WA

Transporter signature (for exports only): Date leaving U.S.: 8-24-16

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Austin Gullidge | Signature | Month 08 Day 24 Year 16

Transporter 2 Printed/Typed Name | Signature | Month Day Year

18. Discrepancy

18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator): U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) | Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: M. Terhunatsi | Signature | Month 08 Day 24 Year 16

GENERATOR | INT'L | TRANSPORTER | DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: [illegible]
2. Page 1 of 1
3. Emergency Response Phone: 1-877-242-7800 - Spill
4. Manifest Tracking Number: 009900468 FLE

5. Generator's Name and Mailing Address:
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 360-293-0506

Generator's Site Address (if different than mailing address):
Equilon Enterprises, LLC,
dba Shell Oil Products US
6505 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name: MB Environmental — U.S. EPA ID Number: [illegible]
7. Transporter 2 Company Name — U.S. EPA ID Number: [illegible]
8. Designated Facility Name and Site Address: Envirogreen Technologies, Similco Lala Lot 41, Kamloops, BC V0X2W0 (800) 688-6438 — U.S. EPA ID Number: P313075 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	22060	P	~~K051~~		
	2. Ticket # 54141 Gr - 27050 Tare - 17480 Net - 9570							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
Bin: #6652
Profile: N/A
Bin VOC (ppm): <500
Trans PO: 4518724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Bartlund — Signature: [signature] — Month 08 Day 24 Year 16

16. International Shipments ☐ Import to U.S. ☒ Export from U.S. Port of entry/exit: Sumas, Huntington
Transporter signature (for exports only): [signature] Date leaving U.S.: 8/24/16

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Ryan Ratz — Signature: [signature] — Month 08 Day 24 Year 16
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a.
Printed/Typed Name: M. Tenhumeke — Signature: M. Tenhumeke — Month 08 Day 24 Year 16

GENERATOR / INT'L / TRANSPORTER / DESIGNATED FACILITY

680

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number

2. Page 1 of

3. Emergency Response Phone: 1-877-262-7400 - Spill

4. Manifest Tracking Number: 009900467 FLE

5. Generator's Name and Mailing Address: Equilon Enterprises, LLC, dba Shell Oil Products US, PO Box 872, Anacortes, WA 98221

Generator's Site Address (if different than mailing address): Equilon Enterprises, LLC, dba Shell Oil Products US, 8505 S Texas Road, Anacortes, WA 98221

Generator's Phone:

6. Transporter 1 Company Name: U.S. EPA ID Number:

7. Transporter 2 Company Name: U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Envirogreen Technologies, Simico Lots Lot 41, Facility's Phone: U.S. EPA ID Number: PSI3075 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	24,240	P	K052
	2. Ticket # 54127					
	3. Gr - 28030 Tare - 17380 Net - 10650					
	4.					

14. Special Handling Instructions and Additional Information

Bin: ~~5417~~ 5422

Profile: N/A

Bin VOC (ppm): <500

Trans PO: 4519972431B

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barblund | Signature | Month 08 Day 23 Year 16

16. International Shipments: ☐ Import to U.S. ☒ Export from U.S. Port of entry/exit: Surrey, Huntingdon

Transporter signature (for exports only): Date leaving U.S.: 8/23/16

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Ryan Ratz | Signature | Month 08 Day 23 Year 16

Transporter 2 Printed/Typed Name | Signature | Month | Day | Year

18. Discrepancy

18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) | U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) | Month | Day | Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: M. Tenhunalki | Signature | Month 08 Day 23 Year 16

GENERATOR | INT'L | TRANSPORTER | DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: [illegible]
2. Page 1 of 1
3. Emergency Response Phone: 1-877-242-7400 - Spill
4. Manifest Tracking Number: 009900466 FLE

5. Generator's Name and Mailing Address: Equilon Enterprises, LLC, dba Shell Oil Products US, PO Box 622, Anacortes, WA 98221

Generator's Site Address (if different than mailing address): Equilon Enterprises, LLC, dba Shell Oil Products US, 9806 S Texas Road, Anacortes, WA 98221

Generator's Phone: 1-800-232-0020

6. Transporter 1 Company Name: US Ecology (a) — U.S. EPA ID Number: [illegible]

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Envirogreen Technologies, Similco Lake Lot 41, Princeton, BC V0X1W0 — U.S. EPA ID Number: PS13076 (02)

Facility's Phone: (604) 295-5339

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	20,660	P	~~K061~~		
	2. Ticket# 54128 Gr - 26550 Tare - 17410 Net - 9140							
	3.							
	4.							

14. Special Handling Instructions and Additional Information

Bin: # 5766 — Bin VOC (ppm): <500

Profile: N/A — Trans PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklind — Signature: [signature] — Month 08 Day 23 Year 16

16. International Shipments: ☐ Import to U.S. ☒ Export from U.S. — Port of entry/exit: Vancouver, B.C.

Transporter signature (for exports only): [signature] — Date leaving U.S.: 8-23-16

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Austin Gullidge — Signature: [signature] — Month 08 Day 23 Year 16

Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy

18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: M. Tenhumaki — Signature: [signature] — Month 08 Day 23 Year 16

GENERATOR — INTL — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WAD007276197
2. Page 1 of 1
3. Emergency Response Phone: 1-877-242-7460 - Spill
4. Manifest Tracking Number: 009900465 FLE

5. Generator's Name and Mailing Address: Equilon Enterprises, LLC, dba Shell Oil Products US, PO Box 532, Anacortes, WA 98221

Generator's Site Address (if different than mailing address): Equilon Enterprises, LLC, dba Shell Oil Products US, 6605 S Texas Road, Anacortes, WA 98221

Generator's Phone: 360-293-0808

6. Transporter 1 Company Name: [illegible] — U.S. EPA ID Number:

7. Transporter 2 Company Name: [illegible] — U.S. EPA ID Number: [illegible]

8. Designated Facility Name and Site Address: Envirogreen Technologies, Sinclair Lake Lot 41, Richmond, BC V6X1W0 — U.S. EPA ID Number: PS13075 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	23,840	P	H061
	2. Ticket# 54121					
	3. Gr 27990					
	4. Tare - 17280					
	Net - 10710					

14. Special Handling Instructions and Additional Information

Bin: #5532

Profile: N/A

Bin VOC (ppm): <500

Trans PO: 4519724319

15. 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. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklund — Signature: [signature] — Month 08 Day 22 Year 16

16. International Shipments: ☐ Import to U.S. ☒ Export from U.S. — Port of entry/exit: Pt Roberts, Delta B.C. — Date leaving U.S.: 8-22-16

Transporter signature (for exports only): [signature]

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Austin Gillidse — Signature: [signature] — Month 08 Day 22 Year 16

Transporter 2 Printed/Typed Name: — Signature: — Month Day Year

18. Discrepancy

18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: M. Tenhunnicke — Signature: M. Tenhunnicke — Month 08 Day 22 Year 16

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: [illegible]
2. Page 1 of 1
3. Emergency Response Phone: 1-877-262-7400 - Spill
4. Manifest Tracking Number: 009900464 FLE

GENERATOR

5. Generator's Name and Mailing Address: Equilon Enterprises, LLC, dba Shell Oil Products US, PO Box 622, Anacortes, WA 98221

Generator's Site Address (if different than mailing address): Equilon Enterprises, LLC, dba Shell Oil Products US, 8605 S Texas Road, Anacortes, WA 98221

Generator's Phone: [illegible]

6. Transporter 1 Company Name: [illegible] U.S. EPA ID Number: [illegible]

7. Transporter 2 Company Name: U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Envirogreen Technologies, Similco Lot 241, Kamloops, BC V0A1W0 U.S. EPA ID Number: PS13075 (02)

Facility's Phone: [illegible]

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	~~61340~~ 22340	P	~~K051~~		
	2. Ticket# 54120 Gr 27630 Tare - 17340 Net - 10290			22,640 GB				
	3.							
	4.							

14. Special Handling Instructions and Additional Information

Bin: # 5884

Profile: N/A

Bin VOC (ppm): <500

Trans PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Bartlind Signature: [signature] Month 08 Day 22 Year 16

INT'L

16. International Shipments: ☐ Import to U.S. ☒ Export from U.S. Port of entry/exit: Sumas, Huntingdon

Transporter signature (for exports only): [signature] Date leaving U.S.: 8/22/16

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Ryan Raitz Signature: [signature] Month 08 Day 22 Year 16

Transporter 2 Printed/Typed Name: Signature: Month Day Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space: ☒ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Quantity changed by Gary Bartlind 9/15/16.

Manifest Reference Number:

18b. Alternate Facility (or Generator) U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: M. Tenhunmaki Signature: [signature] Month 08 Day 22 Year 16

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

007

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WAD982761197
2. Page 1 of 1
3. Emergency Response Phone: 1-877-242-7400 - Spill
4. Manifest Tracking Number: 009900463 FLE

5. Generator's Name and Mailing Address: Equilon Enterprises, LLC, dba Shell Oil Products US, PO Box 622, Anacortes, WA 98221
Generator's Phone: 360-293-0393

Generator's Site Address (if different than mailing address): Equilon Enterprises, LLC, dba Shell Oil Products US, 8506 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name: U.S. EPA ID Number:

7. Transporter 2 Company Name: U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Envirogreen Technologies, Simlico Lots Lot 41, Facility Burlington, BC VOXIWO
U.S. EPA ID Number: P913076 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	21,060	P	H081
	2. Ticket# 54114					
	3. Gr-28740 Tare- 19450					
	4. Net- 9290					

14. Special Handling Instructions and Additional Information
Bin: # 6839
Bin VOC (ppm): <500
Profile: N/A
Trans PO: 4519724319
Disposal PO: PO 67219 02

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklund | Signature: [signature] | Month 08 Day 19 Year 16

16. International Shipments: ☐ Import to U.S. ☒ Export from U.S. Port of entry/exit: Blaine, WA
Transporter signature (for exports only): [signature] Date leaving U.S.: 8-19-16

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Austin Gullidge | Signature: [signature] | Month 08 Day 19 Year 16
Transporter 2 Printed/Typed Name: | Signature: | Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: M. Tenhunmaki | Signature: M. Tenhunmaki | Month 08 Day 19 Year 16

GENERATOR / INT'L / TRANSPORTER / DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: [illegible]
2. Page 1 of: 1
3. Emergency Response Phone: 1-877-242-7400 - Spill
4. Manifest Tracking Number: 009900462 FLE

5. Generator's Name and Mailing Address: [illegible]
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: [illegible]

Generator's Site Address (if different than mailing address):
Equilon Enterprises, LLC,
dba Shell Oil Products US
6506 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name: [illegible] U.S. EPA ID Number: [illegible]

7. Transporter 2 Company Name: [illegible] U.S. EPA ID Number: [illegible]

8. Designated Facility Name and Site Address: U.S. EPA ID Number:
Envirogreen Technologies
Similco Lot 41
Facility's Phone: [illegible] P313076 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	23,600	P	~~K051~~		
	2. Ticket # 54113							
	3. Gr 27930 Tare - 17490 Net - 10440							
	4.							

14. Special Handling Instructions and Additional Information
Bin: # 6824 Bin VOC (ppm): < 500
Profile: N/A Trans PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklind Signature: [signature] Month 08 Day 19 Year 16

16. International Shipments ☐ Import to U.S. ☒ Export from U.S. Port of entry/exit: Huntington BC
Transporter signature (for exports only): [signature] Date leaving U.S.: 8/19/16

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Ryan Ratz Signature: [signature] Month 8 Day 19 Year 16
Transporter 2 Printed/Typed Name: Signature: Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator) U.S. EPA ID Number:
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: M. Tenhumah Signature: [signature] Month 08 Day 19 Year 16

GENERATOR INT'L TRANSPORTER DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WAD008276197
2. Page 1 of: 1
3. Emergency Response Phone: 1-877-212-7400 - Spill
4. Manifest Tracking Number: 009900476 FLE

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 1-360-293-0464

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
8505 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name: MP Environmental
U.S. EPA ID Number: CAT000624247

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Environgreen Technologies
Similco Lot 41
Princeton, BC V0X1W0
Facility's Phone: (604) 295-3330
U.S. EPA ID Number: P313075 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	22,720	P	K051		
	2. Ticket # 54250 Gr. 27470							
	3. Tare - 17830 Net - 9640							
	4.							

14. Special Handling Instructions and Additional Information
Bin: # 6681
Profile: N/A
Bin VOC (ppm): <500
Trans PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklund
Signature:
Month Day Year: 09 01 16

16. International Shipments: ☐ Import to U.S. ☒ Export from U.S.
Port of entry/exit: SUMAS/HUNTINGDON, B.C.
Date leaving U.S.: 09/01/16
Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: JASON TRONSON JR
Signature:
Month Day Year: 09 01 16
Transporter 2 Printed/Typed Name:
Signature:
Month Day Year:

18. Discrepancy
18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: M. Tenhumaki
Signature: M. Tenhumaki
Month Day Year: 09 01 16

GENERATOR | TRANSPORTER | INT'L | DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WAD[illegible]
2. Page 1 of 1
3. Emergency Response Phone: 1-877-242-7400 - Spill
4. Manifest Tracking Number: 009900477 FLE

GENERATOR

5. Generator's Name and Mailing Address:
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: [illegible]

Generator's Site Address (if different than mailing address):
Equilon Enterprises, LLC,
dba Shell Oil Products US
2505 S Tommy Road, Anacortes, WA 98221

6. Transporter 1 Company Name: BP Environmental
U.S. EPA ID Number: CAT[illegible]

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address:
Envirogreen Technologies
Simico Lots 41
Princeton, BC V0X1W0
Facility's Phone: (604) [illegible]
U.S. EPA ID Number: P313076 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S. (API Sludge), 9, PG III	1	CM	2500	P	K051		
	2. Ticket# 54278 Gr - 27380							
	3. Tare - 17620 Net - 9760							
	4.							

14. Special Handling Instructions and Additional Information
Bin: # 5964
Profile: N/A
Bin VOC (ppm): <500
Trans PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklind
Signature: [signature]
Month 09 Day 02 Year 16

INT'L

16. International Shipments: ☐ Import to U.S. ☒ Export from U.S.
Port of entry/exit: SUMAS/HUNTINGDON/B.C.
Date leaving U.S.: 09/02/16
Transporter signature (for exports only): [signature] 9/2

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: JAMES RONSON JR
Signature: [signature]
Month 09 Day 02 Year 16

Transporter 2 Printed/Typed Name:
Signature:
Month Day Year

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: M. Terhurnate
Signature: M. Terhurnate
Month 09 Day 02 Year 16

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WAD009278107
2. Page 1 of: 1
3. Emergency Response Phone: 1-877-242-7400 - Spill
4. Manifest Tracking Number: 009900479 FLE

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 1-800-208-0030

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
0505 3 Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name: MP Environmental
U.S. EPA ID Number: CAT000624747

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Envirogreen Technologies
Simico Lots Lot 41
Surrey, BC V0X1W0
Facility's Phone: (604) 591-5356
U.S. EPA ID Number: PSD13076 (02)

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	23860	P	K061
	2. Ticket # 54299 Gr - 28070					
	3. Tare - 17880 Net - 10190					
	4.					

14. Special Handling Instructions and Additional Information
Bin: 5356
Profile: N/A
Bin VOC (ppm): <500
Trans PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklind
Signature:
Month Day Year: 09 07 16

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S.
Port of entry/exit: Surrey/White Rock
Transporter signature (for exports only):
Date leaving U.S.: 09/07/16

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: THIERRY RUBERT
Signature:
Month Day Year: 09 07 16

Transporter 2 Printed/Typed Name:
Signature:
Month Day Year:

18. Discrepancy
18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number:
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: M. Tenhumak
Signature:
Month Day Year: 09 07 16

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number WAD000276197	2. Page 1 of 1	3. Emergency Response Phone 1-877-242-7400 - Spill	4. Manifest Tracking Number 009900478 FLE

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 1-360-293-0669

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
6505 E Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name
MP Environmental
U.S. EPA ID Number CAT000024247

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
Envirogreen Technologies
Similco Lots Lot 41
Princeton, BC V0X1W0
Facility's Phone: (250) 295-3333
U.S. EPA ID Number PSI3075 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	23540	P	H051
	2. Ticket # 54298 Gr - 27470					
	3. Tare - 17460 Ndet - 10010					
	4.					

14. Special Handling Instructions and Additional Information
Bin: 6684
Profile: N/A
Bin VOC (ppm): <500
Trans PO: 4510724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklund
Signature: [signature]
Month 09 Day 07 Year 16

16. International Shipments ☐ Import to U.S. ☒ Export from U.S. Port of entry/exit: Huntingdon BC/Sumas WA
Transporter signature (for exports only): Date leaving U.S.: 9-7-16

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Ed Biemold
Signature: [signature]
Month 9 Day 7 Year 16

Transporter 2 Printed/Typed Name
Signature
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: M. Tenhumaki
Signature: [signature]
Month 09 Day 07 Year 16

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	WAD009278197	1	1-877-242-7400 - Spill	009900480 FLE

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 1 360 293 0939

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
6505 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name
NP Environmental
U.S. EPA ID Number: CAT000624247

7. Transporter 2 Company Name
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Envirogreen Technologies
Similco Lots Lot 41
Princeton, BC V0X1W0
Facility's Phone: [illegible]
U.S. EPA ID Number: P313075 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	23,320	P	K061
	2. Ticket# 54310 Gr - 27650					
	3. Tare - 16980 Net - 10670					
	4.					

14. Special Handling Instructions and Additional Information
Bin: ~~[illegible]~~ 6429
Profile: N/A
EPA: 171
Bin VOC (ppm): <500 #6429
Trans PO: 4519724319
Disposal PO: [illegible]

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklund
Signature: [signature]
Month Day Year: 09 08 16

16. International Shipments: ☐ Import to U.S. ☒ Export from U.S.
Port of entry/exit: Blaine / Huntingdon
Date leaving U.S.: 09/08/16
Transporter signature (for exports only): [signature]

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Ed Bremold
Signature: [signature]
Month Day Year: 09 08 16
Transporter 2 Printed/Typed Name:
Signature:
Month Day Year:

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator)
U.S. EPA ID Number:
Facility's Phone:
18c. Signature of Alternate Facility (or Generator)
Month Day Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: M. Tienhumaki
Signature: M. Tienhumaki
Month Day Year: 09 08 16

GENERATOR
TRANSPORTER INTL
DESIGNATED FACILITY

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number WAD000276197	2. Page 1 of 1	3. Emergency Response Phone 1-877-242-7400 - Spill	4. Manifest Tracking Number 009900481 FLE

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 360 293 6868

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
0605 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name
MP Environmental
U.S. EPA ID Number: CATN000274287

7. Transporter 2 Company Name
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Envirogreen Technologies
Similco Lels Lot 41
Princeton, BC V0X1W0
Facility's Phone: (604) 295-3139
U.S. EPA ID Number: PSI3075 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	21164	P	H061		
	2. Ticket# 54309 Gr-27470							
	3. Tare-18230 Net-9240							
	4.							

14. Special Handling Instructions and Additional Information
Bin: 6682
Profile: N/A
Bin VOC (ppm): <500
Trans PO: 4519724519

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklind
Signature: [signature]
Month 09 Day 08 Year 16

16. International Shipments ☐ Import to U.S. ☒ Export from U.S.
Port of entry/exit: SUMAS / HUNTINGDON
Date leaving U.S.: 09/08/16
Transporter signature (for exports only): [signature]

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: PHILIP RUBERT
Signature: [signature]
Month 09 Day 08 Year 16

Transporter 2 Printed/Typed Name:
Signature:
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems):
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: M. Tenhumeks
Signature: [signature]
Month 09 Day 08 Year 16

GENERATOR — TRANSPORTER — INT'L — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	WAD009276197	1	1-877-242-7400 - Spill 1-877-504-9354 - Health	009900482 FLE

GENERATOR

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 1-360-293-0040

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
8505 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name
MP Environmental
U.S. EPA ID Number
CAT000624247

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
Envirogreen Technologies
Similco Lot Lot 41
Princeton, BC V0X1W0
Facility's Phone: (604) 295-6336
U.S. EPA ID Number
PS12075 (02)

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	22,000	P	K051
	2. Ticket # 54316					
	3. Gross - 26770 Tare - 16760					
	4. Net - 10010					

14. Special Handling Instructions and Additional Information
Bin: # 6348
Profile: N/A
Bin VOC (ppm): <500
Trans PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklund
Signature: Gary Barklund
Month Day Year: 09 09 16

INT'L

16. International Shipments ☐ Import to U.S. ☒ Export from U.S.
Port of entry/exit: Huntington Beach, CA
Date leaving U.S.: 9-9-16
Transporter signature (for exports only): Ed Biemold

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Ed Biemold
Signature: Ed Biemold
Month Day Year: 9 9 16
Transporter 2 Printed/Typed Name
Signature
Month Day Year

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Katrina Graham
Signature: K. Graham
Month Day Year: 09 09 16

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WAD005278197
2. Page 1 of 1
3. Emergency Response Phone: 1-877-242-7400 - Spill
4. Manifest Tracking Number: 009900483 FLE

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 4 360 293 0000

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
9505 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name: MP Environmental
U.S. EPA ID Number: CAT000626247

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Envirogreen Technologies
Simico Lela Lot 41
Roseburg, OR 97470
Facility's Phone: (541) 679-6334
U.S. EPA ID Number: PSD013076 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. UN3077, Environmentally Hazardous Substances, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	20324	P	K051		
	2. Ticket # 54315							
	3. Gross - 26820 Tare - 17810 Net - 9010							
	4.							

14. Special Handling Instructions and Additional Information
Bin: # 6157
Profile: N/A
Bin VOC (ppm): < 500
Trans PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Bartlind
Signature: [signature]
Month Day Year: 09 09 16

16. International Shipments: ☐ Import to U.S. ☒ Export from U.S.
Port of entry/exit: Sumas / Huntingdon
Transporter signature (for exports only): [signature]
Date leaving U.S.: 09/09/16

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Phillip Ruffner
Signature: [signature]
Month Day Year: 09 09 16
Transporter 2 Printed/Typed Name:
Signature:
Month Day Year:

18. Discrepancy
18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator)
U.S. EPA ID Number:
Facility's Phone:
18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Katrina Graham
Signature: [signature]
Month Day Year: 09 09 16

GENERATOR
TRANSPORTER
INT'L
DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WAD009276197
2. Page 1 of 1
3. Emergency Response Phone: 1-877-242-7400 - Orill
4. Manifest Tracking Number: 009900484 FLE

GENERATOR

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone:

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
6505 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name: MP Environmental
U.S. EPA ID Number: CAT000624247

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Envirogreen Technologies
Similco Lots Lot 41
Princeton, BC V0X1W0
Facility's Phone:
U.S. EPA ID Number: PS13076 (U2)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	22,220	P	K051
	2. Ticket 54346 GN-26870					
	3. Tare - ~~30300~~ 16950 Net - 9980					
	4.					

14. Special Handling Instructions and Additional Information
Bin: # 6250
Profile: N/A
Bin VOC (ppm): <500
Trans PO: 4518724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Bardwell
Signature: [signature]
Month 09 Day 13 Year 16

INT'L

16. International Shipments ☐ Import to U.S. ☒ Export from U.S.
Port of entry/exit: Huntingdon BC / Sumas WA
Transporter signature (for exports only): Ed Biemold
Date leaving U.S.: 9-13-16

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Ed Biemold
Signature: Ed Biemold
Month 9 Day 13 Year 16

Transporter 2 Printed/Typed Name:
Signature:
Month Day Year

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: M. Tenhunen
Signature: M. Tenhunen
Month 09 Day 13 Year 16

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WAD009278187
2. Page 1 of 1
3. Emergency Response Phone: 1-877-242-7400 - Spill
4. Manifest Tracking Number: 009900485 FLE

5. Generator's Name and Mailing Address:
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 1 360 293 6020

Generator's Site Address (if different than mailing address):
Equilon Enterprises, LLC,
dba Shell Oil Products US
8605 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name: MP Environmental
U.S. EPA ID Number: CAT000624247

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address:
Envirogreen Technologies
Similco Lelo Lot 41
Princeton, BC V0X1W0
Facility's Phone: (604) 295-6338
U.S. EPA ID Number: PSI3076 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt/Vol.	13. Waste Codes
X	1 UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	22540	P	K061
	2 Ticket # 54344					
	3 Gross - 27370 Tare - 17570					
	4 Net - 9800					

14. Special Handling Instructions and Additional Information
Bin: # 65755
Profile: N/A
Bin VOC (ppm): < 500
Tixina PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklind
Signature: [signature]
Month Day Year: 09 13 16

16. International Shipments: ☐ Import to U.S. ☒ Export from U.S.
Port of entry/exit: Huntington / Sarnia WA
Transporter signature (for exports only): [signature]
Date leaving U.S.: 9-13-16

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: E. Biemolt
Signature: [signature]
Month Day Year: 9 13 16

Transporter 2 Printed/Typed Name:
Signature:
Month Day Year:

18. Discrepancy
18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Katrina Graham
Signature: K. Graham
Month Day Year: 09 13 16

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number WAD009778197	2. Page 1 of 1	3. Emergency Response Phone 1-877-242-7400 - Spill	4. Manifest Tracking Number 009900486 ELE

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 1-360-293-0668

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
8505 8 Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name: MP Environmental — U.S. EPA ID Number: CAT000624247

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Envirogreen Technologies
Similco Lot Lot 41
Princeton, BC V0X1W0
Facility's Phone: [illegible] — U.S. EPA ID Number: PSD13075 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	18300	P	K051
	2. # 59 Ticket # 54355					
	3. Gross - 25450					
	4. Tare - 17170 Net - 8280					

14. Special Handling Instructions and Additional Information
Bin: # 6823
Profile: N/A
Bin VOC (ppm): <500
Trans PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklund — Signature: [signature] — Month 09 Day 14 Year 16

16. International Shipments ☐ Import to U.S. ☒ Export from U.S. Port of entry/exit: Huntingdon BC / Sumas WA
Transporter signature (for exports only): [signature] Date leaving U.S.: 9/14/16

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Ed Bromold — Signature: [signature] — Month 9 Day 14 Year 16
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Katrina Graham — Signature: [signature] — Month 09 Day 14 Year 16

GENERATOR — TRANSPORTER — INT'L — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number WAD009297A197	2. Page 1 of 1	3. Emergency Response Phone 1-877-242-7400 - Spill	4. Manifest Tracking Number 009900487 FLE

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: [redacted]

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
9505 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name: MP Environmental — U.S. EPA ID Number: CAT000624247

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Envirogreen Technologies
Simico Lots Lot 41
Princeton, BC V0X1W0
Facility's Phone: [redacted] — U.S. EPA ID Number: PS13075 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	22300	P	K063
	2. Ticket # 54356 Gr - 27270					
	3. Tare - 17680 Net - 9590					
	4.					

14. Special Handling Instructions and Additional Information
Bin: # 6328 — Bin VOC (ppm): <500
Profile: N/A — Trans PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklind — Signature: [signature] — Month 09 Day 14 Year 16

16. International Shipments ☐ Import to U.S. ☒ Export from U.S. Port of entry/exit: Huntingdon, BC — Sumas, WA
Transporter signature (for exports only): [signature] 9/14 — Date leaving U.S.: 09-14-16

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Pat Martin — Signature: Pat Martin — Month 09 Day 14 Year 16
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number:
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: M. Tenhumaki — Signature: M. Tenhumaki — Month 09 Day 14 Year 16

GENERATOR — TRANSPORTER — INT'L — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WAD009276197
2. Page 1 of 1
3. Emergency Response Phone: 1-877-242-7490 - Spill
4. Manifest Tracking Number: 009900488 FLE

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 1-360-293-0666

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
2605 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name: IAP Environmental
U.S. EPA ID Number: CAT000624247

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
Envirogreen Technologies
Similco Lots Lot 41
Princeton, BC V0X1W0
Facility's Phone: (604) 295-3235
U.S. EPA ID Number: PS13076 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	20,090	P	K051		
	2. #759 Tiwot - 54397							
	3. Gross - 26170 Tare - ~~17180~~ 17040 na							
	4. Net - ~~10000~~ 9130							

14. Special Handling Instructions and Additional Information
Bin: #6197
Profile: N/A
Bin VOC (ppm): <500
Trans PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklund
Signature: [signature]
Month Day Year: 09 21 16

16. International Shipments ☐ Import to U.S. ☒ Export from U.S. Port of entry/exit: Blaine / Sumas
Transporter signature (for exports only): [signature]
Date leaving U.S.: 9-21-16

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Ed Biernoli
Signature: [signature]
Month Day Year: 9 21 16

Transporter 2 Printed/Typed Name
Signature
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Katrina Graham
Signature: K. Graham
Month Day Year: 09 21 16

GENERATOR | INT'L | TRANSPORTER | DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number WAC000276197	2. Page 1 of 1	3. Emergency Response Phone 1-877-242-7400 - Spill	4. Manifest Tracking Number 009900489 FLE

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 1 360 299 0848

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
8505 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name
MP Environmental
U.S. EPA ID Number
CAT000626247

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
Envirogreen Technologies
Sumico Lots Lot 41
Princeton, BC V0X1W0
Facility's Phone: (604) 497-0338
U.S. EPA ID Number
PSD13076 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	22440	P	K051		
	2. #680 Ticket #54396							
	Gross - 27330 Tare - 17130							
	Net - 10200							

14. Special Handling Instructions and Additional Information
#5939
Bin: Bin VOC (ppm): <500
Profile: N/A Trans PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Bartlund Signature: Month 09 Day 21 Year 16

16. International Shipments: ☐ Import to U.S. ☒ Export from U.S. Port of entry/exit: SUMAS WA WHATCOM CO
Transporter signature (for exports only): Date leaving U.S.: 9/21/16

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: MARTIN ROLLINS Signature: Month 9 Day 21 Year 16
Transporter 2 Printed/Typed Name: Signature: Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Katrina Graham Signature: K Graham Month 09 Day 21 Year 16

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	WAD009276197	1	1-877-242-7400 - Spill 1-877-UAA-9321 - Leak	009900490 FLE

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 1-360-293-0660

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
8605 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name: MP Environmental — U.S. EPA ID Number: CAT000624247

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Envirogreen Technologies
Similco Lot 41
Princeton, BC V0X1W0
Facility's Phone: (604) 293-5330
U.S. EPA ID Number: P313076 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	23,000	P	K051		
	2. #759 Ticket # 54383							
	3. Gross - 27030 Tare - 16940							
	4. Net - 10090							

14. Special Handling Instructions and Additional Information
Bin: #6845
Profile: N/A
Bin VOC (ppm): <500
Trans PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklund — Signature: [signature] — Month 09 Day 16 Year 16

16. International Shipments ☐ Import to U.S. ☒ Export from U.S. Port of entry/exit: Huntingdon BC/Sumas WA
Transporter signature (for exports only): Ed Biernold — Date leaving U.S.: 9-16-16

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Ed Biernold — Signature: Ed Biernold — Month 9 Day 16 Year 16
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Katrina Graham — Signature: K Graham — Month 09 Day 16 Year 16

GENERATOR — TRANSPORTER INT'L — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

803

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WAD009276197
2. Page 1 of 1
3. Emergency Response Phone: 1-877-242-7400 - Shell
4. Manifest Tracking Number: 009900492 FLE

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 1-360-293-0909

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
9505 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name: MP Environmental
U.S. EPA ID Number: CAT000624247

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
Envirogreen Technologies
Similco Lots Lot 41
Princeton, BC V0X1W0
Facility's Phone: 1-866-878-5335
U.S. EPA ID Number: P313076 (02)

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	22920	P	K051
	2. #803 Ticket # 54382					
	3. Gross - 28150 Tare - 17730					
	4. Net - 10420					

14. Special Handling Instructions and Additional Information
Bin: # 6429 6822
Profile: N/A
Bin VOC (ppm): <500
Trans PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklind
Signature: [signature]
Month 09 Day 16 Year 16

16. International Shipments ☐ Import to U.S. ☒ Export from U.S. Port of entry/exit: Sumas/Huntingdon/BC
Transporter signature (for exports only): [signature] 9/16
Date leaving U.S.: 09/16/16

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: JASON T RONSON JR
Signature: [signature]
Month 09 Day 16 Year 16

Transporter 2 Printed/Typed Name
Signature
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Katrina Graham
Signature: K. Graham
Month 09 Day 16 Year 16

GENERATOR | INT'L | TRANSPORTER | DESIGNATED FACILITY

759

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number WAD009376197	2. Page 1 of 1	3. Emergency Response Phone 1-877-242-7400 - Spill	4. Manifest Tracking Number 009900493 FLE

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 1-800-619-0000

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
2505 3 Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name: GP Environmental — U.S. EPA ID Number: CAT000624247

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Envirogreen Technologies
Sinclair Lake Lot 41
Princeton, BC V0X1W0
Facility's Phone: (250) 295-3339
U.S. EPA ID Number: PS13076 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	21,700	P	H051		
	2. Ticket# 54385 Gr - 26700							
	3. Tare - 16860 Net - 9840							
	4.							

14. Special Handling Instructions and Additional Information
Bin: # 5965
Profile: N/A
Bin VOC (ppm): <500
Trans PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklund — Signature: [signature] — Month 09 Day 19 Year 16

16. International Shipments ☐ Import to U.S. ☒ Export from U.S. Port of entry/exit: 9-19-16
Transporter signature (for exports only): [signature] Date leaving U.S.: 9-19-16

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Ed Biemold — Signature: [signature] — Month 9 Day 19 Year 16
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: M. Tenhumaki — Signature: M. Tenhumaki — Month 09 Day 19 Year 16

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

680

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number WAD[illegible]78197	2. Page 1 of 1	3. Emergency Response Phone 1-877-242-7400 - Spill [illegible]	4. Manifest Tracking Number 009900494 FLE

GENERATOR

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 1-360-293-[illegible]

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
8505 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name: MP Environmental
U.S. EPA ID Number: CAT000624247

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Envirogreen Technologies
Similco Lots Lot 41
Princeton, BC V0X1W0
Facility's Phone: [illegible]
U.S. EPA ID Number: PS13075 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	27,600	P	K061
	2. Ticket # 54384 Gr-27470					
	3. Tare- 17570 Net- 9900					
	4.					

14. Special Handling Instructions and Additional Information
Bin: #6175
Profile: N/A
EPA- 171
Bin VOC (ppm): <500
Trans PO: 4518724318
[illegible]

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklind
Signature: [signature]
Month Day Year: 09 19 16

INT'L

16. International Shipments: ☐ Import to U.S. ☒ Export from U.S.
Port of entry/exit: Sumas, WA
Date leaving U.S.: 9/19/16
Transporter signature (for exports only):

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: MARTIN ROLLINS
Signature: [signature]
Month Day Year: 9 19 16
Transporter 2 Printed/Typed Name:
Signature:
Month Day Year:

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator)
U.S. EPA ID Number:
Facility's Phone:
18c. Signature of Alternate Facility (or Generator)
Month Day Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: M. Tenhumaki
Signature: [signature]
Month Day Year: 09 19 16

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	WAD009278197	1	1-877-242-7400 - Spill	009900495 FLE

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 1 360 293 0570

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
9505 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name
HP Environmental
U.S. EPA ID Number: CAT000624247

7. Transporter 2 Company Name
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Envirogreen Technologies
Similco Lots Lot 41
Princeton, BC V0X1W0
Facility's Phone: (604) 295-3129
U.S. EPA ID Number: PSD13076 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	22,000	P	H061		
	2. #759 Ticket # 54393							
	3. Gross - 26710 Tare - 16810							
	4. Net - 9900							

14. Special Handling Instructions and Additional Information
Bin: # 06682
Profile: N/A
Bin VOC (ppm): <500
Trana PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklund
Signature: [signature]
Month Day Year: 09 20 16

16. International Shipments: ☐ Import to U.S. ☒ Export from U.S.
Transporter signature (for exports only): E. Bierwald
Port of entry/exit: Huntingdon BC / Sumas WA
Date leaving U.S.: 9-20-16

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: E. Biermold
Signature: E. Biermold
Month Day Year: 9 20 16
Transporter 2 Printed/Typed Name:
Signature:
Month Day Year:

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator)
U.S. EPA ID Number:
Facility's Phone:
18c. Signature of Alternate Facility (or Generator)
Month Day Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Katrina Graham
Signature: K. Graham
Month Day Year: 09 20 16

GENERATOR / TRANSPORTER / INT'L / DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05). Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WAR000327157
2. Page 1 of 1
3. Emergency Response Phone: 1-877-242-7600 - Grill
4. Manifest Tracking Number: 009900496 FLE

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 1-360-293-1040

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
2605 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name: MP Environmental — U.S. EPA ID Number: CAT000624247

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Envirogreen Technologies
Similco Lot Lot 41
Princeton, BC V0X1W0
Facility's Phone: (604) 295-3333
U.S. EPA ID Number: P313076 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (AP Sludge), 9, PG III	1	CM	2,640	P	K061		
	2. #680 Ticket # 54394							
	3. GROSS - 26780 Tare - 17490							
	4. Net - 9310							

14. Special Handling Instructions and Additional Information
Bin: # 6268
Profile: N/A
Bin VOC (ppm): <500
Trans PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklund — Signature: [signature] — Month 09 Day 20 Year 16

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. — Port of entry/exit: Sumas W/ Huntingford, BC
Transporter signature (for exports only): N/A — Date leaving U.S.: 9/20/16

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: MARTIN ROLLINS — Signature: [signature] — Month 9 Day 20 Year 16
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Katarina Gudmann — Signature: K. Gudmann — Month 09 Day 20 Year 16

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	WAC000276197	1	1-877-242-7400 - Spill	009900497 FLE

GENERATOR

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: [illegible]

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
2605 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name
MP Environmental
U.S. EPA ID Number: CAT000624247

7. Transporter 2 Company Name
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Envirogreen Technologies
Simico Lots Lot 41
Princeton, BC V0X1W0
Facility's Phone: (604) [illegible]
U.S. EPA ID Number: PSD13076 (02)

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S. (API Sludge), 9, PG III	1	CM	23650	P	K051
	2. # 680 Ticket # 54419					
	3. Gross - 28650 Tare - 17900					
	4. Net - 10750					

14. Special Handling Instructions and Additional Information
Bin: #6429
Profile: N/A
Bin VOC (ppm): < 500
Trans PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklind
Signature: [signature]
Month 09 Day 23 Year 16

TRANSPORTER / INT'L

16. International Shipments ☐ Import to U.S. ☒ Export from U.S. Port of entry/exit: SUMAS, WA IN CONTAINER BOX
Transporter signature (for exports only): Date leaving U.S.: 9/23/16

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: MARTIN ROLLINS
Signature: [signature]
Month 9 Day 23 Year 16

Transporter 2 Printed/Typed Name
Signature
Month Day Year

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Katrina Graham
Signature: [signature]
Month 09 Day 23 Year 16

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WAD009278197
2. Page 1 of: 1
3. Emergency Response Phone: 1-877-242-7400 - Shell
4. Manifest Tracking Number: 009900498 FLE

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 1-360-293-0040

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
2505 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name: MP Environmental
U.S. EPA ID Number: CAT000624247

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Envirogreen Technologies
Similco Lab Lot 41
Princeton, BC V0X1W0
Facility's Phone: (604) 295-3316
U.S. EPA ID Number: PSD13075 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	22,000	P	K061		
	2. #759 Ticket # 54409							
	3. Gross - 26750 Tare - 16850							
	4. Net - 9900							

14. Special Handling Instructions and Additional Information
Bin: #6835
Profile: N/A
EPA: 171
Bin VOC (ppm): <500
Trans PO: 4519724319
Manifest PO: 4519725703

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklund
Signature: [signature]
Month Day Year: 09 22 16

16. International Shipments: ☐ Import to U.S. ☒ Export from U.S.
Port of entry/exit: Huntingdon BC / Sumas WA
Transporter signature (for exports only): [signature]
Date leaving U.S.: 9-22-16

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Ed Biernold
Signature: [signature]
Month Day Year: 9 22 16

Transporter 2 Printed/Typed Name:
Signature:
Month Day Year:

18. Discrepancy
18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number:
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Katrina Graham
Signature: K. Graham
Month Day Year: 09 22 16

GENERATOR / INT'L / TRANSPORTER / DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WAD988277167
2. Page 1 of 1
3. Emergency Response Phone: 1-877-248-7400 - Spill
4. Manifest Tracking Number: 009900499 FLE

GENERATOR

5. Generator's Name and Mailing Address: Equilon Enterprises, LLC, dba Shell Oil Products US, PO Box 622, Anacortes, WA 98221

Generator's Site Address (if different than mailing address): Equilon Enterprises, LLC, dba Shell Oil Products US, 8505 S Texas Road, Anacortes, WA 98221

Generator's Phone:

6. Transporter 1 Company Name: MP Environmental — U.S. EPA ID Number: [illegible]

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Envirogreen Technologies, Simico Lain Lot 41, Edgeston, BC V0X1W0 — U.S. EPA ID Number: FS13075 (02)

Facility's Phone:

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S. (API Sludge), 9, PG III	1	CM	23840	P	K051		
	2. Ticket # 54477 #156							
	3. Gross - 28450 Tare - 17610							
	4. Net - 10840							

14. Special Handling Instructions and Additional Information

Bin: #6575 — Bin VOC (ppm): <500

Profile: N/A — Trans PO: 4519734319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklund — Signature: [signature] — Month 09 Day 28 Year 16

TRANSPORTER INT'L

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. — Port of entry/exit: SUMAS/HUNTINGDON

Transporter signature (for exports only): — Date leaving U.S.: 9/27/16

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: MARTIN ROLLINS — Signature: [signature] — Month 9 Day 27 Year 16

Transporter 2 Printed/Typed Name — Signature — Month Day Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Katrina Graham — Signature: K. Graham — Month 09 Day 27 Year 16

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number WAD009278187	2. Page 1 of 1	3. Emergency Response Phone 1-877-242-7400 - Spill	4. Manifest Tracking Number 009900500 FLE

GENERATOR

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 4 360 293 1666

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
6605 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name
MP Environmental
U.S. EPA ID Number
CAT000624247

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
Envirogreen Technologies
Simico Lab Lot 41
Princeton, BC V0X1W0
Facility's Phone: (604) 295-3330
U.S. EPA ID Number
PS313075 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III #756	1	CM	22,318	P	K051
	2. Ticket # 54511					
	3. Gross - 27460					
	Tare - 17740					
	4. Net - 9720					

14. Special Handling Instructions and Additional Information
Bin: #06680
Profile: N/A
Bin VOC (ppm): < 500
Trans PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Bartlund
Signature: [signature]
Month Day Year: 09 28 16

INT'L

16. International Shipments ☐ Import to U.S. ☒ Export from U.S.
Port of entry/exit: SUMAS, WA / HUNTINGDON BC
Transporter signature (for exports only): MA
Date leaving U.S.: 9/28/16

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: MARTIN ROLLINS
Signature: MA
Month Day Year: 9 28 16
Transporter 2 Printed/Typed Name
Signature
Month Day Year

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Katrina Graham
Signature: K. Graham
Month Day Year: 09 28 16

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number WAD000278197	2. Page 1 of 1	3. Emergency Response Phone 1-877-242-7400 - Spill	4. Manifest Tracking Number 009900501 FLE

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 1-360-293-0600

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
9515 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name
MP Environmental
U.S. EPA ID Number: CAT000624247

7. Transporter 2 Company Name
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Envirogreen Technologies
Sinilco Lots Lot 41
Sidmaston, BC V0X1W0
Facility's Phone: (604) 988-5538
U.S. EPA ID Number: PS13075 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III #795 759	1	CM	20,500	P	K051
	2. Ticket # 54521 Gross - 26180					
	3. Tare - 17190 Net - 8990					
	4.					

14. Special Handling Instructions and Additional Information
Bin: # 6873
Profile: N/A
Bin VOC (ppm): <500
Trans PO: 4519724319

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Bartlund
Signature: [signature]
Month 09 Day 29 Year 16

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S.
Transporter signature (for exports only): Ed Biemold
Port of entry/exit: Huntington Beach, CA
Date leaving U.S.: 9-29-16

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Ed Biemold
Signature: Ed Biemold
Month 9 Day 29 Year 16

Transporter 2 Printed/Typed Name:
Signature:
Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Katrina Graham
Signature: K. Graham
Month 09 Day 29 Year 16

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	WAD009276197	1	1-877-244-7609 - Spill 1-877-404-9351 - Heat	009900505 FLE

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 1-360-293-0300

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
5605 3 Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name: NP Environmental — U.S. EPA ID Number: CAT000624247

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Envirogreen Technologies
Similco Lots Lot 41
Princeton, BC V0X1W0
Facility's Phone: (604) 889-6336
U.S. EPA ID Number: PS13075 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III #759	1	CM	21,200	P	K051
	2. Ticket # 54539					
	3. Gross - 26390 Tare - 16930					
	4. Net - 9460					

14. Special Handling Instructions and Additional Information
Bin: # 6849, 6328
Profile: N/A
ERG: 171
Bin VOC (ppm): < 500
Trans PO: 4518724319
Disposal PO: 4518725782

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklind — Signature: [signature] — Month 09 Day 30 Year 16

16. International Shipments ☐ Import to U.S. ☒ Export from U.S. — Port of entry/exit: Huntingdon BC / Sumas WA
Transporter signature (for exports only): Ed Biemold — Date leaving U.S.: 9-30-16

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Ed Biemold — Signature: Ed Biemold — Month 9 Day 30 Year 16
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Katrina Graham — Signature: K. Graham — Month 09 Day 30 Year 16

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number WAD009276197	2. Page 1 of 1	3. Emergency Response Phone 1-877-262-7400 - Spill 1-877-504-9351 - Health	4. Manifest Tracking Number 009900511 FLE

GENERATOR

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 1-360-293-0053

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
3505 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name
IEP Environmental
U.S. EPA ID Number
CAT000624247

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
Envirogreen Technologies
Similco Lake Lot 41
Princeton, BC V0X1W0
Facility's Phone: (604) 880-5338
U.S. EPA ID Number
PS13075 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III #759	1	CM	13200	P	K051
	2. Ticket # 31609					
	3. Gross - 23100 Tare - 17140					
	4. Net - 5960					

14. Special Handling Instructions and Additional Information
Bin: #6686
Profile: N/A
ERG: 171
Bin VOC (ppm): <500
Trans PO: 4519724319
Disposal PO: 4519725792

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Bartlund
Signature: [signature]
Month 10 Day 12 Year 16

INT'L

16. International Shipments ☐ Import to U.S. ☒ Export from U.S.
Port of entry/exit: Huntington / Lyons
Date leaving U.S.: 10-12-16
Transporter signature (for exports only): Ed Biemold

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Ed Biemold
Signature: Ed Biemold
Month 10 Day 12 Year 16
Transporter 2 Printed/Typed Name
Signature
Month Day Year

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Katrina Graham
Signature: K. Graham
Month 10 Day 10 Year 12

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WAD009276197

2. Page 1 of 1

3. Emergency Response Phone: 1-877-242-7400 - Spill; 1-877-604-9361 - Health

4. Manifest Tracking Number: 009900510 FLE

GENERATOR

5. Generator's Name and Mailing Address: Equilon Enterprises, LLC, dba Shell Oil Products US, PO Box 622, Anacortes, WA 98221

Generator's Site Address (if different than mailing address): Equilon Enterprises, LLC, dba Shell Oil Products US, 6505 S Texas Road, Anacortes, WA 98221

Generator's Phone: 1-360-293-0868

6. Transporter 1 Company Name: MR Environmental — U.S. EPA ID Number: CAT000624247

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Envirogreen Technologies, Sindico Lab Lot 41, Princeton, BC V0X1W0 — U.S. EPA ID Number: P313075 (02)

Facility's Phone: (604) 669-6336

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III #005	1	CM	2,000	P	K061
	2. Ticket # 54584					
	Gross - 27430					
	3. Tare - 17700					
	Net - 9730					
	4.					

14. Special Handling Instructions and Additional Information

Bin: # 6823
Profile: N/A
ERG: 171

Bin VOC (ppm): < 500
Trane PO: 4519724319
Disposal PO: 4519725782

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklind — Signature: [signature] — Month 10 Day 07 Year 16

INT'L

16. International Shipments: ☐ Import to U.S. ☒ Export from U.S. — Port of entry/exit: Huntington / Sarnia — Transporter signature (for exports only): [signature] — Date leaving U.S.: 10-7-16

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Ed Riemoll — Signature: [signature] — Month Day Year

Transporter 2 Printed/Typed Name — Signature — Month Day Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Katrina Graham — Signature: [signature] — Month 10 Day 07 Year 16

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: WAD009278197
2. Page 1 of 1
3. Emergency Response Phone: 1-877-242-7400 - Spill; 1-877-504-9381 - Health
4. Manifest Tracking Number: 009900509 FLE

GENERATOR

5. Generator's Name and Mailing Address: Equilon Enterprises, LLC, dba Shell Oil Products US, PO Box 622, Anacortes, WA 98221
Generator's Phone: 1-360-293-0868
Generator's Site Address (if different than mailing address): Equilon Enterprises, LLC, dba Shell Oil Products US, 8505 3 Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name: MP Environmental
U.S. EPA ID Number: CAT000624247

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Envirogreen Technologies, Similco Lake Lot 41, Princeton, BC V0X1W0
Facility's Phone: (604) 828-6336
U.S. EPA ID Number: PS13075 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III #005	1	CM	21,400	P	K051		
	2. Ticket # 54582 Gross - 27490							
	3. Tare - 17500 Net - 9990							
	4.							

14. Special Handling Instructions and Additional Information
Bin: #6849
Profile: N/A
ERG: 171
Bin VOC (ppm): <500
Trans PO: 4519724318
Disposal PO: 4519725792

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklind
Signature: Gary Barklind
Month 10 Day 06 Year 16

INT'L

16. International Shipments: ☐ Import to U.S. ☒ Export from U.S.
Transporter signature (for exports only): Ed Biernold
Port of entry/exit: Huntingdon BC / Sumas WA
Date leaving U.S.: 10-6-16

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Ed Biernold
Signature: Ed Biernold
Month 10 Day 16 Year 16
Transporter 2 Printed/Typed Name:
Signature:
Month Day Year

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Katrina Graham
Signature: K. Graham
Month 10 Day 06 Year 16

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number WAD009276197	2. Page 1 of 1	3. Emergency Response Phone 1-877-542-7400 - Spill 1-877-804-9881 - Health	4. Manifest Tracking Number 009900508 FLE

GENERATOR

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 1-360-293-0668

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
8505 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name
MP Environmental
U.S. EPA ID Number CAT000624247

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
Envirogreen Technologies
Similco Lelo Lot 41
Princeton, BC V0X1W0
Facility's Phone: (604) 699-5338
U.S. EPA ID Number PSD13075 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III #005	1	CM	22,300	P	K061
	2. Ticket # 54574					
	3. Gross - 27530 Tare - 17690					
	4. Net - 9840					

14. Special Handling Instructions and Additional Information
Bin: #6692
Profile: N/A
ERG: 171
Bin VOC (ppm): <500
Trans PO: 4519724319
Disposal PO: 4519725792

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Bartlind
Signature: Gary Bartlind
Month Day Year: 10 05 16

INT'L

16. International Shipments ☐ Import to U.S. ☒ Export from U.S.
Port of entry/exit: Huntington, WV
Transporter signature (for exports only): Ed Riemold
Date leaving U.S.: 10-5-16

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Ed Riemold
Signature: Ed Riemold
Month Day Year: 10 5 16
Transporter 2 Printed/Typed Name
Signature
Month Day Year

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Katrina Graham
Signature: K Graham
Month Day Year: 10 05 16

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number WAD009276197	2. Page 1 of 1	3. Emergency Response Phone 1-877-242-7400 - Spill 1-877-804-9381 - Health	4. Manifest Tracking Number 009900507 FLE

GENERATOR

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 1-360-293-0050

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
6505 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name
MF Environmental
U.S. EPA ID Number CAT000624247

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
Envirogreen Technologies
Similco Lot 41
Princeton, BC V0X1W0
Facility's Phone: (604) 499-5336
U.S. EPA ID Number P313075 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III # 005	1	CM	20,000	P	K051		
	2. Ticket # 54566 Gross - 26520							
	3. Tare - 17470 Net - 9050							
	4.							

14. Special Handling Instructions and Additional Information
Bin: # 6847
Profile: N/A
ERG: 171
Bin VOC (ppm): <500
Trans PO: 4519724319
Disposal PO: 4519725792

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklind
Signature: [signature]
Month 10 Day 04 Year 16

INT'L

16. International Shipments ☐ Import to U.S. ☒ Export from U.S. Port of entry/exit: Huntingdon/Sumas
Transporter signature (for exports only): [signature]
Date leaving U.S.: 10-4-16

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Ed Biemolt
Signature: [signature]
Month 10 Day 4 Year 16

Transporter 2 Printed/Typed Name
Signature
Month Day Year

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Katrina Graham
Signature: [signature]
Month 10 Day 04 Year 16

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number WAD009270187	2. Page 1 of 1	3. Emergency Response Phone 1-877-804-6361 - Spill 1-877-804-6361 - Healt	4. Manifest Tracking Number 009900506 FLE

5. Generator's Name and Mailing Address
Equilon Enterprises, LLC,
dba Shell Oil Products US
PO Box 622, Anacortes, WA 98221
Generator's Phone: 1-360-293-0980

Generator's Site Address (if different than mailing address)
Equilon Enterprises, LLC,
dba Shell Oil Products US
5608 S Texas Road, Anacortes, WA 98221

6. Transporter 1 Company Name: MP Environmental — U.S. EPA ID Number: CAT000624247

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address
Envirogreen Technologies
Simico Lots Lot 41
Princeton, BC V0X1W0
Facility's Phone: (604) 689-6336
U.S. EPA ID Number: P313075 (02)

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, Environmentally Hazardous Substance, Solid, N.O.S., (API Sludge), 9, PG III	1	CM	~~9610~~ 20,900	P	K051
	2. TICKET # 54548 GROSS - 27250					
	3. TARE - 17640 NET - 9610					
	4.					

14. Special Handling Instructions and Additional Information
Bin: # 6850
Profile: N/A
ERG: 171
Bin VOC (ppm): <500
Trans PO: 4519724319
Disposal PO: 4519725792

15. 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.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Barklind — Signature: [signature] — Month 10 Day 03 Year 16

16. International Shipments ☐ Import to U.S. ☒ Export from U.S. — Port of entry/exit: Huntingdon — Date leaving U.S.: 10-3-16
Transporter signature (for exports only): Ed Bismold

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Ed Bismold — Signature: Ed Bismold — Month Day Year
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: RYAN ROACH — Signature: [signature] — Month 10 Day 03 Year 16

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

007

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number

2. Page 1 of 4

3. Emergency Response Phone: 1-877-242-7400 - Shell

4. Manifest Tracking Number: 008410103 FLE

5. Generator's Name and Mailing Address: Equilon Enterprises, LLC, dba Shell Oil Products US, PO Box 872, Anacortes, WA 98221

Generator's Site Address (if different than mailing address): Equilon Enterprises, LLC, dba Shell Oil Products US, 8505 S Texas Road, Anacortes, WA 98221

Generator's Phone: 360-293-0408

6. Transporter 1 Company Name: U.S. EPA ID Number

7. Transporter 2 Company Name: U.S. EPA ID Number

8. Designated Facility Name and Site Address: Envirogreen Technologies, Similco Lab Lot 41, Princeton, BC V0X1W0

U.S. EPA ID Number: PSI3076 (02)

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN 3077, Waste Environmentally Hazardous Solid, N.O.S., (K001), 9, PG III	1	CM	21,000	P	K001
	2. HH#50448					
	3. gr. 27290 tare 17400					
	4. net 9890					

14. Special Handling Instructions and Additional Information

Bin: #5848

Profile: N/A

WASTE MANIFEST FOR CONTAINER #5848 (N. BUNDLE PAD)

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are ... d, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applica... e Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowle... I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity gene...

Generator's/Offeror's Printed/Typed Name: Gary Barklund

Signature:

Month Day Year: 08 26 15

16. International Shipments: ☐ Import to U.S. ☒ Export from U...

Transporter signature (for exports only):

Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Austin Gallagher

Signature:

Month Day Year: 08 26 15

Transporter 2 Printed/Typed Name:

Signature:

Month Day Year:

18. Discrepancy

18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator)

U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator)

Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: LYNDA ENGLISH

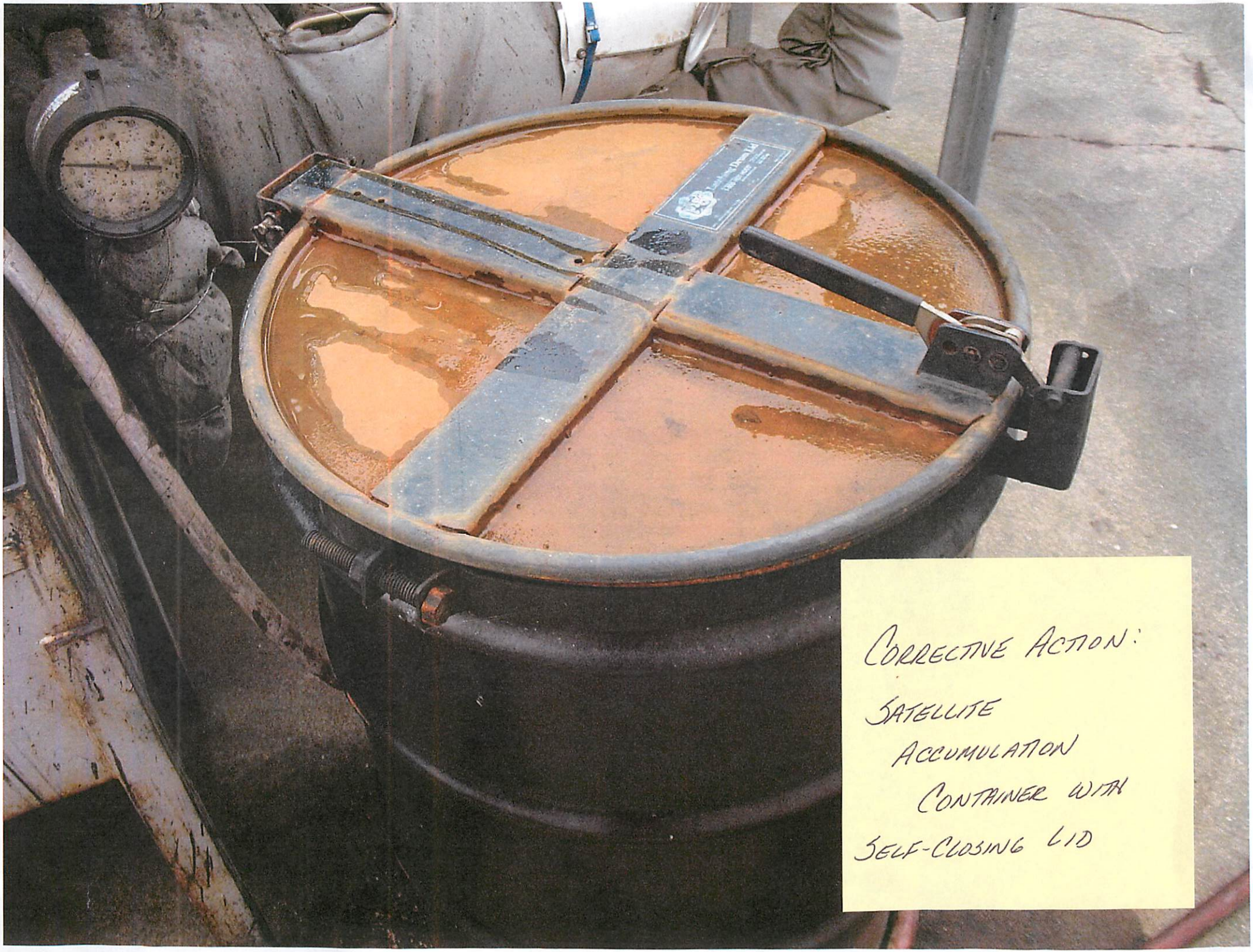
Signature: Lynda English

Month Day Year: 08 26 15

GENERATOR | INT'L | TRANSPORTER | DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR STATE (IF REQUIRED)


CORRECTIVE ACTION:
SATELLITE
ACCUMULATION
CONTAINER WITH
SELF-CLOSING LID

MAY - 8 2017

Ecology used this guidance to evaluate several parameters in Shell's treated effluent. In addition to the approach recommended in the guidance, Ecology compared maximum values with permit limits. See **Appendix O** for the summary and evaluation of monitoring data.

For the parameters evaluated, Shell's monitoring history has demonstrated an ability to consistently comply with regulatory limits. Ecology based the proposed monitoring frequencies on the guidance recommendations and best professional judgment.

Ecology reduced the monitoring frequency for COD and maintained the current monitoring frequencies for TSS, O&G, and sulfide. In some cases EPA's policy would have allowed less frequent monitoring. TSS and O&G are good indicators of when there is an upset condition at the wastewater treatment facility. Ecology maintained the monitoring frequencies for phenols, ammonia, and BOD. Ecology uses best professional judgment to determine a reduced monitoring frequency to reward Shell's good performance but also provide enough data to monitor the health of the wastewater treatment process. Shell must maintain good performance levels to continue to receive the reduced monitoring frequencies. If the facility's performance levels deteriorate, Ecology can revert to the previous monitoring requirements.

V. Other Permit Conditions

A. Monitoring flow at API and BOD_5 at bioreactor

Special Condition S2.A includes a requirement to install a flow meter and monitor at the effluent from the API and a requirement to monitor BOD_5 at the influent to the bioreactor. This monitoring is to demonstrate compliance with the facility loading requirements in Special Condition S6.

B. Priority pollutant testing

Shell is required to sample the effluent from Outfall 001 annually and analyze the sample for priority pollutants. Shell must submit the results of the analysis to Ecology within 90 days of each sampling event.

C. Reporting and record keeping

Ecology based Special Condition S3 on its authority to specify any appropriate reporting and record keeping requirements to prevent and control waste discharges (WAC 173-220-210).

D. Operation and maintenance manual

Ecology requires industries to take all reasonable steps to properly operate and maintain their wastewater treatment system in accordance with state and federal regulations [40 CFR 122.41(e) and WAC 173-220-150(1)(g)]. The facility has prepared and submitted an operation and maintenance manual as required by state regulation for the construction of wastewater treatment facilities (WAC 173-240-150). Implementation of the procedures in

the operation and maintenance plan ensures the facility's compliance with the terms and limits in the permit.

E. Non routine and unanticipated wastewater

Occasionally, this facility may generate wastewater which was not characterized in the permit application because it is not a routine discharge and was not anticipated at the time of application. These wastes typically consist of waters used to pressure-test storage tanks or fire water systems or of leaks from drinking water systems.

The permit authorizes the discharge of non-routine and unanticipated wastewater under certain conditions. The facility must characterize these wastewaters for pollutants and examine the opportunities for reuse. Depending on the nature and extent of pollutants in this wastewater and on any opportunities for reuse, Ecology may:

- Authorize the facility to discharge the wastewater.
- Require the facility to treat the wastewater.
- Require the facility to reuse the wastewater.

F. Wastewater treatment efficiency study and updated engineering report

Shell submitted the results of an updated treatment efficiency study and an engineering report for the wastewater treatment system to Ecology on December 13, 2012. Ecology approved the original engineering report submitted in February, 2004.

The refinery's biological system is operating at approximately 52 percent of its organic (as BOD_5) treatment capacity and 70 percent to 80 percent of its hydraulic loading capacity.

Ecology will require a new wastewater treatment efficiency study if Shell proposes substantial alterations to the refinery that could cause a material change in the quantity or composition of the influent processed by the wastewater treatment system. In the event Ecology requires the study, Shell must submit a wastewater treatment study plan for Ecology approval. Shell must also update its engineering report to compare the new conditions with the predicted design capacity.

G. Pollution prevention plan

The previous NPDES permit required Shell to submit a Pollution Prevention Plan to identify opportunities to prevent, reduce, eliminate, or control releases of pollutants to influent wastewater streams, stormwater, and other waters of the state. The permit required Shell to implement opportunities that were technically and economically feasible. The NPDES Pollution Prevention Plan incorporates previous NPDES permit requirements for a spill plan, solid waste handling and disposal plan, and a stormwater pollution prevention plan.

The following are projects completed by Shell during the last permit cycle that had a positive impact on wastewater treatment plant operations and provides protection to the receiving waters:

- **Closed loop sample stations** – The benefit is excess hydrocarbons from purging the line before sampling are recycled back to the source line instead of dumping to the sewer. This reduces approximately 11,000 gallons of hydrocarbons from entering the sewer.

- **Flare recovery light ends** – Excess and unplanned releases of amine to the sewer from this system have been effectively mitigated.

- **Plant-wide erosion control project** – This project included placing riprap throughout the refinery to prevent total suspended solids (TSS) in the stormwater system. As a result of this project, the level of TSS discharged to the effluent plant during major rainfall events appears to be greatly reduced.

- **Enhanced process control** – Automation of the wastewater stripper steam to feed ration was completed in 2010. By enhancing the system, the pollutant loading to the oily water sewer was reduced.

- **Pollution prevention training** – The training re-emphasizes environmental awareness which is essential to the success of the pollution prevention program. Refinery staff and managers are required to complete the training.

- **EQ tank conversion** –The equalization tank was converted to a pretreatment bioreactor. This project resulted in a 70 percent increase in biological treatment and reduced TSS in the discharge.

The proposed permit includes a pollution prevention requirement to follow-up on the work done by the refinery in the previous permit cycle. It includes a requirement to:

- Continue to follow and update BMPs, SOPs, and other work practices to prevent or minimize the release of pollutants to the wastewater treatment system, stormwater, and waters of the state.
- Submit an update to the current NPDES Pollution Prevention Plan.
- Submit a biennial evaluation of the Pollution Prevention Plan.
- Conduct stormwater inspections to ensure the adequacy of BMPs and to identify any unknown improper discharges to stormwater.
- Continue to identify and evaluate pollution prevention opportunities in all decisions having environmental consequences.

H. Dangerous wastes – permit by rule requirements

The proposed permit authorizes Shell to treat dangerous wastes generated on or off-site at the wastewater treatment facility, under the permit-by-rule provisions of WAC 173-303-802(5). This authorization is limited to the on-site and off-site waste streams identified and

characterized in the NPDES permit application and in application amendments approved by Ecology. Wastes received from off-site include ballast water and retail distribution water. Ecology determined that the waste streams from off-site are similar in nature to those generated on-site and concluded that Tesoro's wastewater treatment facility should effectively treat them.

Effluent sampling and monitoring requirements established in the permit should adequately address the pollutants in these waste streams. Permit-by-rule provisions cover the identified waste streams as long as the refinery complies with the conditions of the NPDES permit and with the dangerous waste requirements in WAC 173-303 pertaining to:

- Notification and identification numbers.
- Designation of dangerous wastes.
- Performance standards.
- General waste analysis.
- Security.
- Contingency plans and emergency procedures.
- Emergencies.
- Manifest system.
- Operating record.
- Facility reporting.

I. Outfall evaluation

The proposed permit requires Shell to conduct an outfall inspection and submit a report detailing the findings of that inspection (Special Condition S.12). The inspection must evaluate the physical condition of the discharge pipe and diffusers, and evaluate the extent of sediment accumulations in the vicinity of the outfall.

J. Certified Operator

The refinery generates approximately 20,000 gallons of domestic wastewater per day. The domestic wastewater is commingled with process wastewater and treated in the refinery's wastewater treatment system. Per WAC 173-230-140, Ecology requires the refinery's operator in responsible charge of the day-to-day operation of the wastewater treatment plant to be certified for at least a **Class II** plant by the State of Washington.

K. General Conditions

Ecology bases the standardized General Conditions on state and federal law and regulations. They are included in all individual industrial NPDES permits issued by Ecology.