UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

JUL 02 2008

LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Thomas Cozza
Safety, Sanitation and Compliance Manager
Clear Lam Packaging, Inc.
1950 Pratt Boulevard
Elk Grove Village, Illinois 60007

Re: Notice of Violation
RCRA Compliance Evaluation Inspection – Clear Lam Packaging, Inc.
EPA I.D. No.: ILD 984 805 317

Dear Mr. Cozza:

On May 1, 2008, a representative of the U.S. Environmental Protection Agency inspected the Clear Lam Packaging, Inc. (Clear Lam Packaging) facility, located in Elk Grove Village, Illinois. The purpose of the inspection was to evaluate Clear Lam Packaging's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report, along with the Office of Enforcement and Compliance Assurance EPA Small Business Information Sheet and the Illinois Waste Management and Research Center Sustainable Solutions brochure for your reference.

Based on information provided by Clear Lam Packaging personnel, review of records, and personal observations made by the inspector at the time of the investigation, the EPA has determined that Clear Lam Packaging is in violation of the Illinois Administrative Code (IAC) and the United States Code of Federal Regulations (CFR).

To be eligible for the exemption from having a hazardous waste storage permit, Clear Lam Packaging must be in compliance with the conditions of 35 IAC § 722.134(a) and (c) [40 CFR § 262.34(a) and (c)]. We find that Clear Lam Packaging was in noncompliance with the following conditions for a hazardous waste storage permit exemption:

1. A generator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any

area of facility operation in an emergency. *See*, 35 IAC § 722.134(a)(4); 35 IAC § 725.135 [40 C.F.R. § 262.34(a)(4); 40 C.F.R. § 265.35].

At the time of the inspection, Clear Lam Packaging was storing approximately fifty 55-gallon containers of hazardous waste without adequate aisle space in the hazardous waste storage area.

2. A generator of hazardous waste must ensure that the date, upon which each period of accumulation begins, is clearly marked and visible for inspection on each container of hazardous waste, and while being accumulated on-site, each container of hazardous waste must be labeled or marked clearly with the words, "Hazardous Waste." *See*, 35 IAC § 722.134(a)(2) and (a)(3) [40 CFR § 262.34(a)(2) and (a)(3)].

At the time of the inspection, Clear Lam Packaging was storing one 55-gallon container of hazardous waste without an accumulation date and without the words, "Hazardous Waste," marked on the container.

3. A generator of hazardous waste must keep each container holding hazardous waste closed during storage, except when it is necessary to add or remove waste. *See*, 35 IAC §§ 722.134(a)(1)(A) and 725.273(a) [40 CFR §§ 262.34(a)(1)(i) and 265.173(a)].

At the time of the inspection, Clear Lam Packaging failed to keep several containers, including two containers having funnels screwed into the openings of the containers, of hazardous waste closed during storage, at a time when waste was not being added to or removed from the containers.

4. A generator of hazardous waste must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. *See*, 35 IAC § 722.134(a)(1)(A); 35 IAC § 725.274 [40 CFR § 262.34(a)(1)(i); 40 CFR § 265.174].

At the time of the inspection, Clear Lam Packaging had not performed weekly inspections of the hazardous waste storage area.

5. A generator of hazardous waste must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance. *See*, 35 IAC § 722.134(a)(4); 35 IAC § 725.116(c) and (d) [40 CFR § 262.34(a)(4); 40 C.F.R. § 265.16(c)(d)].

At the time of the inspection, Clear Lam Packaging's training program was not designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including; procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment; response to groundwater contamination incidents; and shutdown of operations. In addition, Clear Lam Packaging's training program did

not include documentation that facility personnel took part in an annual review of the initial training required for years 2005 and 2006; did not include job titles, job descriptions or a written description of the type and amount of both initial training and continuing training that will be given to each person filling a position dealing with hazardous waste management; did not document that the training or job experience required had been given to, and completed by, facility personnel; and did not maintain training records of former employees for at least three years from the last date of employment.

6. A generator of hazardous waste must meet all of the requirements of the contingency plan as required in Subpart D (contingency plan and emergency procedures) of 40 CFR Part 265. *See*, 35 IAC § 722.134(a)(4); 35 IAC § 725.152(c), (d) and (e) [40 CFR § 262.34(a)(4); 40 C.F.R. § 265.52(c), (d) and (e)].

   At the time of the inspection, Clear Lam Packaging did not describe arrangements with the hospitals and/or emergency response teams; did not contain the current emergency coordinator's name, office and home phone numbers and address; did not identify all of the emergency equipment including description, capability, and location; and had not been submitted to the police department, fire department, hospital or emergency response teams.

7. A generator of hazardous waste must make an attempt to make arrangements, as appropriate, with local emergency authorities to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes; agreements designating the primary authority where more than one police or fire department might not respond; agreements with State emergency response teams, contractors and equipment suppliers; and arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility, as required in Subpart C (preparedness and prevention) of 40 CFR Part 265. *See*, 35 IAC § 722.134(a)(4); 35 IAC § 725.137(a)(3) and (a)(4) [40 CFR § 262.34(a)(4); 40 C.F.R. § 265.37(a)(3) and (a)(4)].

   At the time of the inspection, Clear Lam Packaging had not made agreements with State emergency response teams, contractors or equipment suppliers and had not made arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could results from fires, explosions or releases at the facility.

8. A generator that accumulates hazardous waste on-site for more than 90 days is an operator of a hazardous waste storage facility, and is required to obtain an Illinois hazardous waste storage permit. *See*, 35 IAC § 722.134(b) [40 C.F.R. § 262.34(b)].

   At the time of the inspection, Clear Lam Packaging was storing one 55-gallon container of flammable hazardous waste for approximately 16 days greater than 90 days and one 55-

gallon container of flammable hazardous waste for approximately 40 days greater than 90 days. *See,* Photographs 21, 22 and 24, located in Attachment 1 of the enclosed Compliance Evaluation Inspection Report. Therefore, Clear Lam Packaging was required to obtain a hazardous waste storage permit.

9. A large quantity generator that accumulates hazardous waste on-site and does not meet the conditions for a permit exemption of 35 IAC § 722.134 and 40 CFR § 262.34 is an operator of a hazardous waste storage facility, and is required to obtain an Illinois hazardous waste storage permit. *See*, 35 IAC § 722.134(a) [40 CFR § 262.34(a)]. Upon failing to meet the conditions identified in item numbers 1 through 8, listed above, Clear Lam Packaging became an operator of a hazardous waste storage facility. Clear Lam Packaging has not applied for or received a hazardous waste storage permit nor does Clear Lam Packaging have interim status. Clear Lam Packaging's failure to apply for and obtain a hazardous waste storage permit violated the permitting requirements of 35 IAC §§ 703.121 and 702.123 [40 CFR §§ 270.1(c) and 270.13]

At this time, U.S. EPA is not requiring Clear Lam Packaging to apply for an Illinois hazardous waste storage permit, provided that Clear Lam Packaging immediately complies with the conditions for an exemption set forth in the regulations identified above.

Under Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), EPA may issue an order assessing a civil penalty for any past or current violations and requiring compliance immediately or within a specified time period.

Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above requirements.

You should submit your response to Jamie L. Paulin, U.S. Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Paulin, of my staff, at (312) 886-1771.

Sincerely,

for

Willie H. Harris, P.E.
Chief, RCRA Branch
Land and Chemicals Division

Enclosures

cc: Todd Marvel, Illinois Environmental Protection Agency

Clear Lam
PACKAGING, INC.
ENGINEERED PACKAGING SOLUTIONS

1950 Pratt Blvd. • Elk Grove Village, IL 60007, USA • Phone: 847-439-8570 • Fax: 847-439-8589 • www.clearlam.com
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July 31, 2008

Ms. Jamie L. Paulin
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
LR-8J
Chicago, Illinois 60604

Re: Response
Notice of Violation
RCRA Compliance Evaluation Inspection – Clear Lam Packaging, Inc.
EPA I.D. No. : ILD 984 805 317

Dear Ms. Paulin:

The following is the Clear Lam Packaging, Inc. (Clear Lam) response to the above-referenced Notice of Violation (NOV), as requested in the NOV. Clear Lam is committed to being fully compliant with all aspects of the Resource Conservation and Recovery Act (RCRA) for the hazardous waste management operations at our facility. We have taken immediate and significant steps since your facility inspection to ensure that all aspects of our in-house RCRA program are of the highest quality. This includes such steps as recent attendance by Clear Lam RCRA program management at additional outside formal RCRA training programs, retaining an environmental engineering consultant to assist with enhancements to our program, and taking the immediate stepwise actions to address all of the items noted in the NOV as indicated in our responses below.

Our specific responses to the U.S. Environmental Protection Agency (USEPA) findings noted in the NOV are as follows:

1. ***USEPA NOV Finding:*** *A generator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency. See, 35 IAC 722.134(a)(4); 35 IAC 725.135 [40 C.F.R. 262.34(a)(4); 40 C.F.R. 265.351].*

   At the time of the inspection, Clear Lam Packaging was storing approximately fifty 55-gallon containers of hazardous waste without adequate aisle space in the hazardous waste storage area.

   Clear Lam Response: The hazardous waste storage area in the facility has been organized such that there is aisle space (36") (Exhibit 1) for unobstructed movement of personnel and equipment throughout the area. A current facility layout shows (Exhibit 2) the drum storage capacity of the area to a maximum of ninety (90) fifty-five gallon drums (north side). Permanent lines are painted on the floor see (Exhibit 3) of the facility to indicate to the RCRA area operators the exact required positioning of drums (floor level only - not stacked), and the areas to be maintained open as aisle/drum access areas. This configuration is shown diagrammatically in the drawing attached to this letter as see (Exhibit 2). The photograph attached as (Exhibit 2) to this letter is an indication of updated arrangement of drums in this area. Note that we have increased the frequency of our waste shipments from the facility to ensure that this drum arrangement can be maintained. Waste shipments will now be made every two weeks, with the entire Clear Lam hazardous waste inventory being shipped during each waste pickup. These arrangements have also been included as highlighted requirements in our employee hazardous waste training program.

2. ***USEPA NOV Finding:*** *A generator of hazardous waste must ensure that the date, upon which each period of accumulation begins, is clearly marked and visible for inspection on each container of hazardous waste, and*

while being accumulated on-site, each container of hazardous waste must be labeled or marked clearly with the words, "Hazardous Waste." See, 35 IAC 722.134(a)(2) and (a)(3) [40 CFR 262.34(a)(2) and (a)(3)].

At the time of the inspection, Clear Lam Packaging was storing one 55-gallon container of hazardous waste without an accumulation date and without the words, "Hazardous Waste," marked on the container.

Clear Lam Response: ***All*** storage containers at the Clear Lam facility are, and will continue to be, labeled with accumulation dates and the appropriate "Hazardous Waste" designation on the container. This requirement will also be highlighted during all employee hazardous waste training sessions.

3. ***USEPA NOV Finding:*** *A generator of hazardous waste must keep each container holding hazardous waste closed during storage, except when it is necessary to add or remove waste. See, 35 IAC 722.134(a)(l)(A) and 725.273(a) [40 CFR 262.34(a)(l)(i) and 265.173(a)].*

   At the time of the inspection, Clear Lam Packaging failed to keep several containers, including two containers having funnels screwed into the openings of the containers, of hazardous waste closed during storage, at a time when waste was not being added to or removed from the containers.

   Clear Lam Response: All containers in the hazardous waste storage area are now closed and will remain so during all periods except during filling of the containers. All waste funneling equipment will be maintained in a clean manner such that the funneling equipment will not produce spilled materials when not in use. Waste funnels which were used at the facility at the time of the inspection have been replaced by newly purchased (Exhibit 4) funnels. The new funnels have tightly fitting covers and will be maintained in a clean condition at all times. This will be reviewed during each formal weekly facility inspection. This requirement will also be stressed during all employee hazardous waste training sessions.

4. ***USEPA NOV Finding:*** *A generator of hazardous waste must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. See, 35 IAC 722.134(a)(l)(A); 35 IAC 725.274 [40 CFR 262.34(a)(l)(i); 40 CFR 265.1741.*

   At the time of the inspection, Clear Lam Packaging had not performed weekly inspections of the hazardous waste storage area.

   Clear Lam Response: Clear Lam is stressing to all employees that it is the responsibility of each employee working in the hazardous waste storage area to be alert to any leaks or container deterioration that may result in leaks. In the event of a leak or identification of a condition which may result in leaking, the observer must notify Clear Lam management of such conditions so that an appropriate and timely response can be implemented. In addition, a formal weekly inspection is being conducted for the entire hazardous waste storage area. An inspection form, provided as (Exhibit 5) to this letter, is posted (Exhibit 6) at the entrance to the hazardous waste storage area to document all formal inspections and any randomly noted observations that may require attention and maintenance. Copies of inspection forms are being maintained in the Clear Lam RCRA files.

5. ***USEPANOV Finding:*** *A generator of hazardous waste must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance. See, 35 IAC 722.134(a)(4); 35 IAC 725.1 16(c) and (d) [40 CFR 262.34(a)(4); 40 CFR 265.16(c)(d)].*

   At the time of the inspection, Clear Lam Packaging's training program was not designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including; procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment; response to groundwater contamination incidents; and shutdown of operations. In addition, Clear Lam Packaging's training program did not include documentation that facility personnel took part in an annual review of the initial training required for years 2005 and 2006;

did not include job titles, job descriptions or a written description of the type and amount of both initial training and continuing training that will be given to each person filling a position dealing with hazardous waste management; did not document that the training or job experience required had been given to, and completed by, facility personnel; and did not maintain training records of former employees for at least three years from the last date of employment.

Clear Lam Response: Since the inspection, Clear Lam has taken the following actions:

- Tom Cozza of Clear Lam conducts on-going corporate training. Since the time of the facility inspection, Mr. Cozza has himself attended a week-long formal RCRA training program presented by McCoy and Associates. The program description and Mr. Cozza's certification of completion are attached as (Exhibit 7). Mr. Cozza's attendance at this program was intended to enhance his RCRA management skills and training capabilities.
- Clear Lam has retained registered professional environmental engineer consultants from O'Shea Environmental Associates, Inc. (Lemont, IL) to assist Mr. Cozza in the continued development of the Clear Lam RCRA training program to ensure that the requirements noted in the NOV are appropriately addressed.
- Mr. Cozza is currently in the process of conducting updated training for all Clear Lam employees who work with RCRA waste materials. Ongoing documentation of this training is being made using the form shown as (Exhibit 8) to this letter.

6. ***USEPA NOV Finding:*** *A generator of hazardous waste must meet all of the requirements of the contingency plan as required in Subpart D (contingency plan and emergency procedures) of 40 CFR Part 265. See, 35 IAC 5 722.134(a)(4); 35 IAC 5 725.152(c), (d) and (e) 140 CFR 5 262.34(a)(4); 40 C.F.R. 5 265.52(c), (d) and (e)].*

   At the time of the inspection, Clear Lam Packaging did not describe arrangements with the hospitals and or emergency response teams; did not contain the current emergency coordinator's name, office and home phone numbers and address; did not identify all of the emergency equipment including description, capability, and location; and had not been submitted to the police department, fire department, hospital or emergency response teams.

   Clear Lam Response: The Clear Lam Emergency Action Plan has been updated to include specific contingency plans, emergency procedures and Clear Lam management contacts for the hazardous waste storage area as indicated in the USEPA finding above. Arrangements have been made with the following outside emergency response representatives, which are also identified in the Emergency Action Plan:

   - Hospital: (insert Name, phone number, phone for ambulance)
   - Police Department (insert Name, Address, Phone No.)
   - Fire Department (insert Name, Address, Phone No.)
   - Spill Response Contractor (insert Name, Address, Phone No. , if you have one)

   A copy of an updated Clear Lam Hazardous Waste Contingency Plan is also attached in (Exhibit 9) to this letter.

7. ***USEPA NOV Finding:*** *A generator of hazardous waste must make an attempt to make arrangements, as appropriate, with local emergency authorities to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes; agreements designating the primary authority where more than one police or fire department might not respond; agreements with State emergency response teams, contractors and equipment suppliers; and arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases*

at the facility, as required in Subpart C (preparedness and prevention) of 40 CFR Part 265. See, 35 IAC 722.134(a)(4); 35 IAC 725.137(a)(3) and (a)(4) 140 CFR 262.34(a)(4); 40 CFR 265.37(a)(3) and (a)(4)].

At the time of the inspection, Clear Lam Packaging had not made agreements with State emergency response teams, contractors or equipment suppliers and had not made arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could results from fires, explosions or releases at the facility.

Clear Lam Response: We have contacted the outside emergency response agencies and contractors indicated in the response to Item 6 above. We have also provided typical hazardous waste compositions and facility diagrams to the police and fire departments and emergency response contractor. The facility access diagram shows access routes, the locations in the building of the hazardous waste storage area, and the locations of spill response equipment. This diagram is included herein in (Exhibit 8) to this letter.

8. ***USEPANOV Finding:*** *A generator that accumulates hazardous waste on-site for more than 90 days is an operator of a hazardous waste storage facility, and is required to obtain an Illinois hazardous waste storage permit. See, 35 IAC 722.134(b) [40 CFR 262.34(b)].*

   At the time of the inspection, Clear Lam Packaging was storing one 55-gallon container of flammable hazardous waste for approximately 16 days greater than 90 days and one 55-gallon container of flammable hazardous waste for approximately 40 days greater than 90 days. See, Photographs 21, 22 and 24, located in Attachment 1 of the enclosed Compliance Evaluation Inspection Report. Therefore, Clear Lam Packaging was required to obtain a hazardous waste storage permit.

   Clear Lam Response: As indicated in several of responses provided above, all waste containers are labeled with the accumulation date, and we have enhanced the management of the hazardous waste containers to ensure that the earliest accumulated materials are shipped from the facility first. In addition, we have increased the frequency of our waste shipments to further ensure the timely removal of the waste material from the facility. All of the waste stored at the facility will be removed at the time of each waste shipment week. This waste material management requirement is being highlighted in our employee hazardous waste training program.

9. ***USEPANOV Finding:*** *A large quantity generator that accumulates hazardous waste on-site and does not meet the conditions for a permit exemption of 35 IAC 722.134 and 40 CFR 262.34 is an operator of a hazardous waste storage facility, and is required to obtain an Illinois hazardous waste storage permit. See, 35 IAC 722.134(a) [40 CFR 262.34(a)]. Upon failing to meet the conditions identified in item numbers 1 through 8, listed above, Clear Lam Packaging became an operator of a hazardous waste storage facility. Clear Lam Packaging has not applied for or received a hazardous waste storage permit nor does Clear Lam Packaging have interim status. Clear Lam Packaging's failure to apply for and obtain a hazardous waste storage permit violated the permitting requirements of 35 IAC 703.121 and 702.123 [40 CFR 270.1 (c) and 270.13]*

   At this time the U.S. EPA is not requiring Clear Lam Packaging to apply for an Illinois hazardous waste storage permit, provided that Clear Lam Packaging immediately complies with the conditions for an exemption set forth in the regulations identified above.

   Clear Lam Response: As indicated in the responses to Items 1 through 8 above, Clear Lam has taken immediate actions and will continue to implement enhancements to the hazardous waste handling and storage program at every opportunity.

In summary, Clear Lam management and staff are very serious in our environmental compliance initiatives, and we intend to make every effort to ensure that our hazardous waste handling, storage, shipment and disposal program meets every Federal and State RCRA requirement. We believe that the actions indicated in our responses to the NOV items as described above address your concerns, but we would also welcome any additional comments that

you may have regarding our program. Please do not hesitate to contact me at 847-439-8570 should you have any questions or would like to further discuss any aspect of this important environmental program.

Sincerely,
CLEAR LAM PACKAGING, INC.

Thomas E. Cozza
Safety, Sanitation & Compliance Manager

TEC/ljj

CURRENTLY REFERENCED EXHIBITS TO BE ADDED:

EXHIBIT 1: RECENT PHOTO SHOWING CURRENT CLEAN, ORDERLY ARRANGEMENT OF DRUMS WITH AISLE SPACE

EXHIBIT 2: PLOT PLAN OF HAZARDOUS WASTE STORAGE AREA SHOWING AISLE ARRAGEMENT.

EXHIBIT 3: RECENT PHOTO SHOWING CURRENT CLEAN, ORDERLY ARRANGEMENT OF AISLE SPACE

EXHIBIT 4: PHOTO OF NEWLY ACQUIRED WASTE FUNNELING EQUIPMENT

EXHIBIT 5: WEEKLY/MONTHLY HAZARDOUS WASTE AREA INSPECTION FORM

EXHIBIT 6: WEEKLY POSTING TO FRONT ENTRANCE OF STORAGE ROOM HAZARDOUS WASTE AREA INSPECTION FORM

EXHIBIT 7: RECENT RCRA TRAINING DOCUMENTATION AND STANDARD CLEAR LAM RCRA TRAINING DOCUMENTATION FORM

EXHIBIT 8: HAZARDOUS WASTE TRAINING MATERIALS

EXHIBIT 9: UPDATED HAZARDOUS WASTE CONTINGENCY PLAN AND EMERGENCY ACCESS PLOT PLAN PROVIDED TO FIRE/POLICE/ETC.

SEE EXHIBITS ATTACHED

Clear Lam
PACKAGING, INC.
ENGINEERED PACKAGING SOLUTIONS

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FACSIMILE TRANSMITTAL

DATE: 5-6-08
COMPANY: U.S. EPA
ATTN: Jamie Paulin
FAX #: 312-353-4788
NUMBER OF PAGES: 4 (Including Cover Sheet)
FROM: Bob White

SPECIAL INSTRUCTIONS

IF YOU DON'T RECEIVE ALL PAGES OR IF THEY ARE ILLEGIBLE,
PLEASE CONTACT OUR OFFICE AT (847) 439-8570.

GENERATOR NOTIFICATION TO RECLAIMED ENERGY CO. OF LAND DISPOSAL RESTRICTIONS

Part I Generator Information

Generator: Clear Lam

Waste Stream #: 12349 EPA ID#: ILD 984 805 317

Manifest Number: 000 556 895 JJE Wastewater: _____ Non-wastewater X

Manifest Line #: 11a. X 11b. ____ 11c. ____ 11d. ____

Signature Statement: All of the information in this document is complete and accurate to the best of my knowledge and information

Signature: [signature] Title: _____ Date: _____

Part II Treatment Standards for Characteristic Waste

_____ D001 High TOC subcategory that are managed in Non-CWA/ Non-CWA equivalent/Non-class I SDWA systems

X **D001 High TOC Ignitable characteristic liquids subcategory – greater than or equal to 10% TOC**

Waste Code		Metal	Concentration	Waste Code		Metal	Concentration
	D004	Arsenic	5.0 mg/l		D008	Lead	5.0 mg/L
	D005	Barium	100.0 mg/L		D009	Mercury	.20 mg/L
	D006	Cadmium	1.0 mg/L		D010	Selenium	5.7 mg/L
	D007	Chromium	5.0 mg/L		D011	Silver	5.0 mg/L

☐ This waste must be treated so that it meets universal treatment standards for 1) constituent that caused the waste to be identified a hazardous and 2) all other underlying hazardous constituents listed in 40 CFR 268.48.

List individual waste codes: _____ _____ _____ _____ _____

☐ This waste is hazardous only because it exhibits the following TC organic waste codes(S): _____ _____ and must be treated to the treatment standards under 268.40 and the individual treatment standards at 268.48 for the subset of underlying hazardous constituents listed below:

List individual uhc: _____ _____ _____ _____ _____

NOTE: This notification is required by 40 CFR 268.7. It is to be attached to the manifest for the initial shipment of each hazardous waste stream to Reclaimed Energy. A copy is to be retained by the generator for three years.

III Treatment Standards for Listed Wastes (check codes that apply)

____ F001 ____ F002 X F003 ____ F004 X F005

Check if Applicable	Regulated Hazardous Constituent	CAS Number	Wastewaters Conc. (mg/L)	Non Wastewaters Conc. (mg/L)
X	Acetone	67-64-1	0.28	160.0
	Benzene	71-43-2	0.14	10.0
	n-Butyl Alcohol	71-36-3	5.6	2.6
	Carbon Disulfide	75-15-0	3.8	4.8 mg/L TCLP
	Carbon Tetrachloride	56-23-5	0.057	6.0
	Chlorobenzene	108-90-7	0.057	6.0
	m-Cresol	108-39-4	0.77	5.6
	o-Cresol	95-46-7	0.11	5.6
	Cyclohexanone	108-94-1	0.36	0.75 mg/L TCLP
	p-Cresol	106-44-5	0.77	5.6
	o-Dichlorobenzene	95-50-1	0.088	6.6
X	Ethyl acetate	141-78-6	0.34	33
	Ethyl benzene	100-41-4	0.057	10
	Ethyl Ether	60-29-7	0.12	160
	Isobutyl Alcohol	78-83-1	5.6	170
	Methanol	67-56-1	5.6	0.75mg/L TCLP
	Methylene Chloride	75-09-2	0.089	30
X	Methyl Ethyl Ketone	78-93-3	0.28	36
	Methyl Isobutyl Ketone	108-10-1	0.14	33
	Nitrobenzene	98-95-3	0.068	14
	Pyridine	110-86-1	0.014	16
	Tetrachloroethylene	127-18-4	0.056	6.0
X	Toluene	108-88-3	0.08	10
	1,1,1 Trichloroethane	71-55-6	0.054	6.0
	1,1,2 Trichloroethane	79-00-5	0.054	6.0
	Trichloroethylene	79-01-6	0.054	6.0
	1,1,2-trichloro 1,2,2-triflouroethane	76-13-1	0.057	30
	Trichloromonoflouromethane	75-69-4	0.02	30
	Xylenes (total)	1330-20-7	0.32	30

Other Listed Codes: Waste Code	Subcategory Description	Treatment Standard 268.40 (check if applicable)	Or	Technology Code (if applicable, enter treatment code)

1072305 8/30/07

CTRL NO: 9989

Form Approved, OMB No. 2050-0039

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

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	ILD984805317	1 1	(847)439-8570	000556895 JJK

5. Generator's Name and Mailing Address
CLEAR LAM PACKAGING, INC.
1950 PRATT BLVD. ELK GROVE VILL., IL 60007
(847)439-8570

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

SEP 10 2007

Generator's Phone:

6. Transporter 1 Company Name
SUPERIOR TRANSPORTATION LOGISTICS LLC

U.S. EPA ID Number: INR000104224

7. Transporter 2 Company Name

U.S. EPA ID Number:

8. Designated Facility Name and Site Address
RECLAIMED ENERGY CO., INC.
1500 WESTERN AVE. CONNERSVILLE, IN 47331
(765)825-7101

U.S. EPA ID Number: IND006786403

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.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. WASTE FLAMMABLE LIQUIDS, N.O.S. (CONTAINS PROPANOL, PROPYL ACETATE), 3 UN1993 PG II (NO LABEL) DOT EXEM 126	001	TT	4300	G			
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
1. PR#12349

PLACARDS OFFERED 24 TPH 175

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 CFR262.27(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: CLEAR LAM GERARDO LOPEZ | Signature | Month 8 Day 30 Year 07

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

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: John D. Henry | Signature | Month 08 Day 30 Year 07
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:
U.S. EPA ID Number

18b. Alternate Facility (or Generator)

Facility's Phone: | Month Day Year

18c. Signature of Alternate Facility (or Generator)

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

1.	2.	3.	4.
H020			

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: Don Eckerle | Signature: Don Eckerle | Month 08 Day 30 Year 07

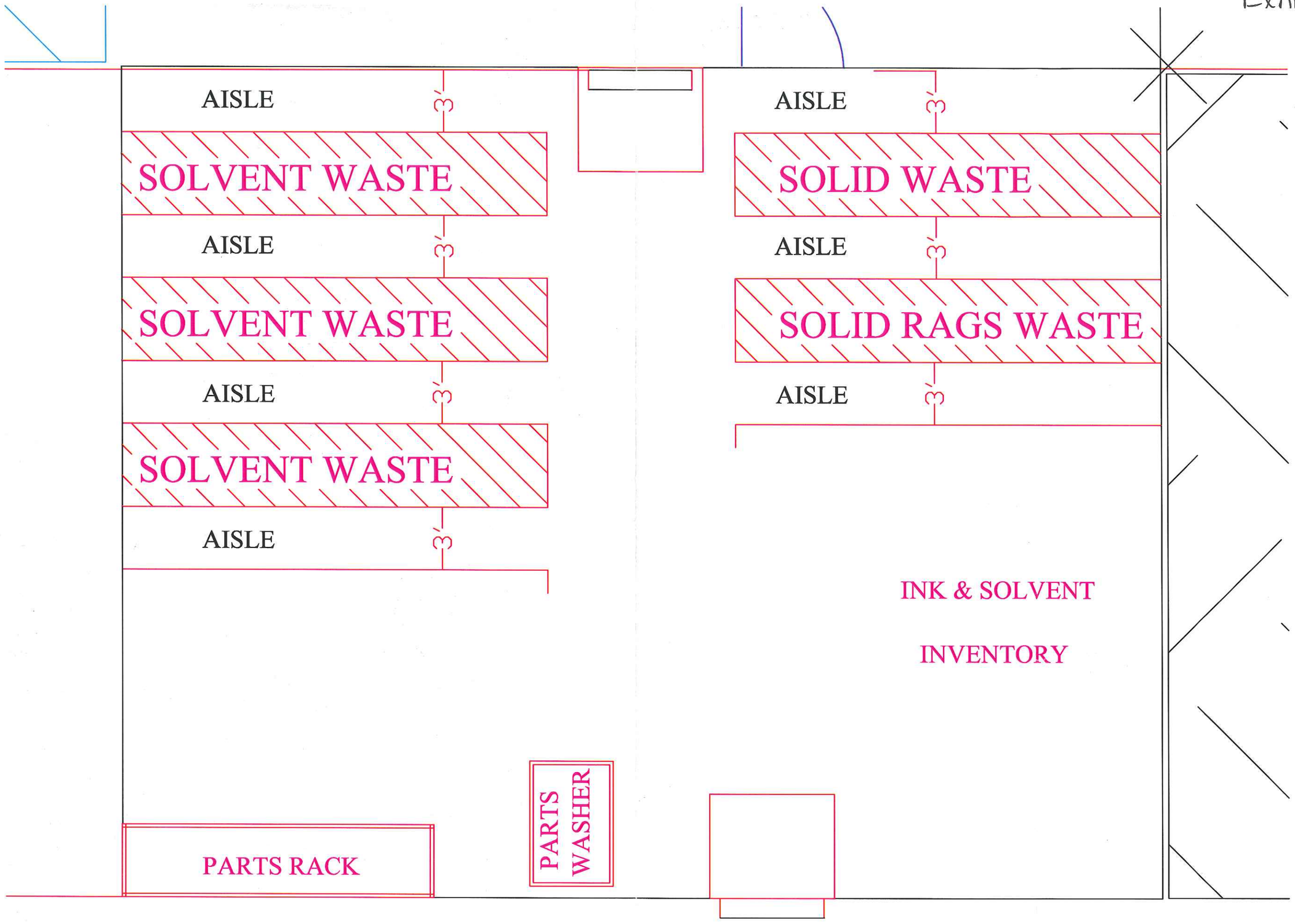
GENERATOR — TRANSPORTER — INT'L — DESIGNATED FACILITY

DESIGNATED FACILITY TO GENERATOR

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

Exhibit 1

Exhibit 2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SOLID RAGS WASTE
AISLE
3'
INK & SOLVENT
INVENTORY
PARTS RACK
PARTS WASHER

Exhibit 3

Exhibit 4

Exhibit 5

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HAZARDOUS WASTE CONTAINER STORAGE AREA INSPECTION CHECKLIST

Instructions: Weekly, place a "Yes" next to all inspection items that meet facility rules. Place a "No" next to all inspection items that does not meet the rules.

Please provide specific comments on all "No-marked" items. When weekly inspection is completed, inspector **must** initial at the bottom of the table. Report all No-marked items to appropriate supervisor.

	Four-Week Inspection Period			
Inspection Item	**Date:** _____	**Date:** _____	**Date:** _____	**Date:** _____
How Many Containers in Containment Area				
Are all Drums/Containers Marked/Labeled With A Hazardous Waste Label/Codes **40 CFR 262.31; 40 CFR 262.32**				
Are All Drums/Containers Marked With Accumulation Start Date/Visible/Readable				
Any Drums/Containers That Are Near or Have Exceeded The 90 Day Timeframe				
Are Any Containers Observed Leaking or Is There Evidence of Spills **40 CFR 265.174**				
All Drums/Containers Observed with Closed Tops or Bungs **40 CFR 265.173(a); 29 CFR 1910.22(c)**				
All Drums/Containers Observed without Dents or Corrosion **40 CFR 265.171**				
Is There Appropriate Aisle Space Maintained (24" or 36") **40 CFR 265.35**				
Containment System free of Water or Other Liquids				
Is the Secondary Containment Free of Cracks or Other Failures **40 CFR 265.193(a)**				
Are Sumps Clean and free of Contamination, Spills, Leaks, and Standing Water				

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	Four-Week Inspection Period			
Inspection Item	**Date:** _____	**Date:** _____	**Date:** _____	**Date:** _____
Are Spill Kits Stocked				
Is The Emergency Eye Wash Station Functioning Properly				
Are The Emergency Communication Devices Operating Properly/Posted **40 CFR 262.34(d)(5)(ii)**				
Is Emergency Response Information Posted Near All Communication Devices				
Inspectors Initials				

Overall Comments: _____

_____

_____

_____

_____

_____

_____

_____

_____

_____

Reviewed by: _____ Date: _____

Note: State and Federal regulations require that this inspection be performed weekly.

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Monthly **Hazardous Waste Program Checklist**

1. **Hazardous Waste: Container Management**

Yes	No	N/A	
			Are hazardous waste containers and areas where they are stored inspected for leaks at least weekly? **40 CFR 265.174**
			Are hazardous waste containers holding ignitable or reactive waste stored at least 50 feet from the facility's property line? **40 CFR 265.176**
			Are hazardous waste containers in good condition? **40 CFR 265.171**
			Are hazardous waste containers not opened, handled, or stored in a manner which may rupture them or cause them to leak? **40 CFR 265.173(b)**
			Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste? **40 CFR 265.177(b)**
			Are incompatible hazardous wastes separated from each other by a berm, dike, wall, or other device? **40 CFR 265.177(c)**
			At closure, are all hazardous wastes and associated residues removed from the containment system? **40 CFR 264.178**
			Do you prevent incompatible wastes or materials from being placed in the same containers? **40 CFR 265.177**
			Does your storage area provide secondary containment for hazardous waste? **40 CFR 265.193(a)**
			Is each hazardous waste container kept closed, except when adding or removing waste? **40 CFR 265.173(a); 29 CFR 1910.22(c)**
			Is each hazardous waste container made of a material that will not react with the waste it stores? **40 CFR 265.172**
			Is there sufficient aisle space in the hazardous waste storage area to allow unobstructed movement of personnel and equipment? **40 CFR 265.35**

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2. Hazardous Waste: Emergency Response

Yes	No	N/A	
			Is emergency information posted in every area where you store hazardous waste? **40 CFR 262.34(d)(5)(ii)**
			Is the necessary emergency equipment for response to hazardous waste spills available (fire extinguishers, spill control supplies, absorbents, MSDS's)? **40 CFR 265.32; 40 CFR 265.51(a); 40 CFR 265.56(e)**
			Is there at least one employee on the premises or on call (i.e., available to respond to an emergency by reaching the facility in a short period of time) responsible for coordinating all applicable hazardous waste emergency response measures? **40 CFR 262.34(d)(5)(iv)**

3. Hazardous Waste: Shipping

Yes	No	N/A	
			Is DOT marking and labeling requirements for shipments of hazardous waste followed in accordance with 49 CFR 172? **40 CFR 262.31; 40 CFR 262.32**
			Is each hazardous waste container of 119 gallons or less marked in accordance with 49 CFR 172.304? **40 CFR 262.32(b)**
			Is hazardous waste packaged in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? **40 CFR 262.30**

4. Hazardous Waste: Storage

Yes	No	N/A	
			Do you store hazardous wastes in an aboveground storage tank (AST)? If yes, are all hazardous waste requirements complied with?
			If hazardous waste is stored on the grounds, are all hazardous waste requirements complied with?
			Is emergency information posted near a telephone? **40 CFR 262.34(d)(5)(ii)**

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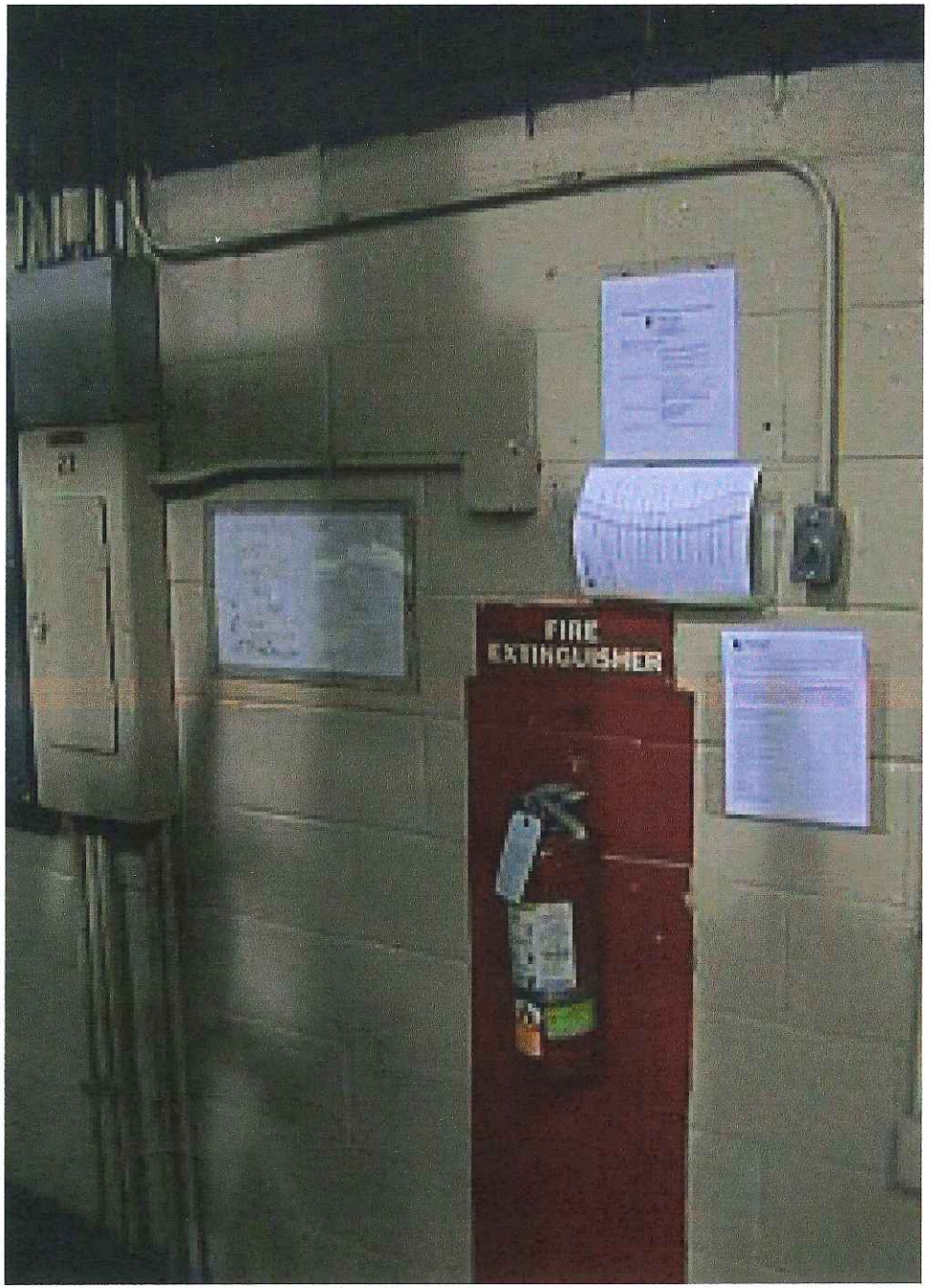
			Is the necessary emergency equipment available (fire extinguishers, spill control supplies)? **40 CFR 265.32; 40 CFR 265.51(a); 40 CFR 265.56(e)**
			Is there at least one employee either on the premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility of coordinating all applicable emergency response measures? **40 CFR 262.34(d)(5)(iv)**

Inspected by: _____ Date: _____

Reviewed by: _____ Date: _____

Overall Comments: _____

Exhit 6



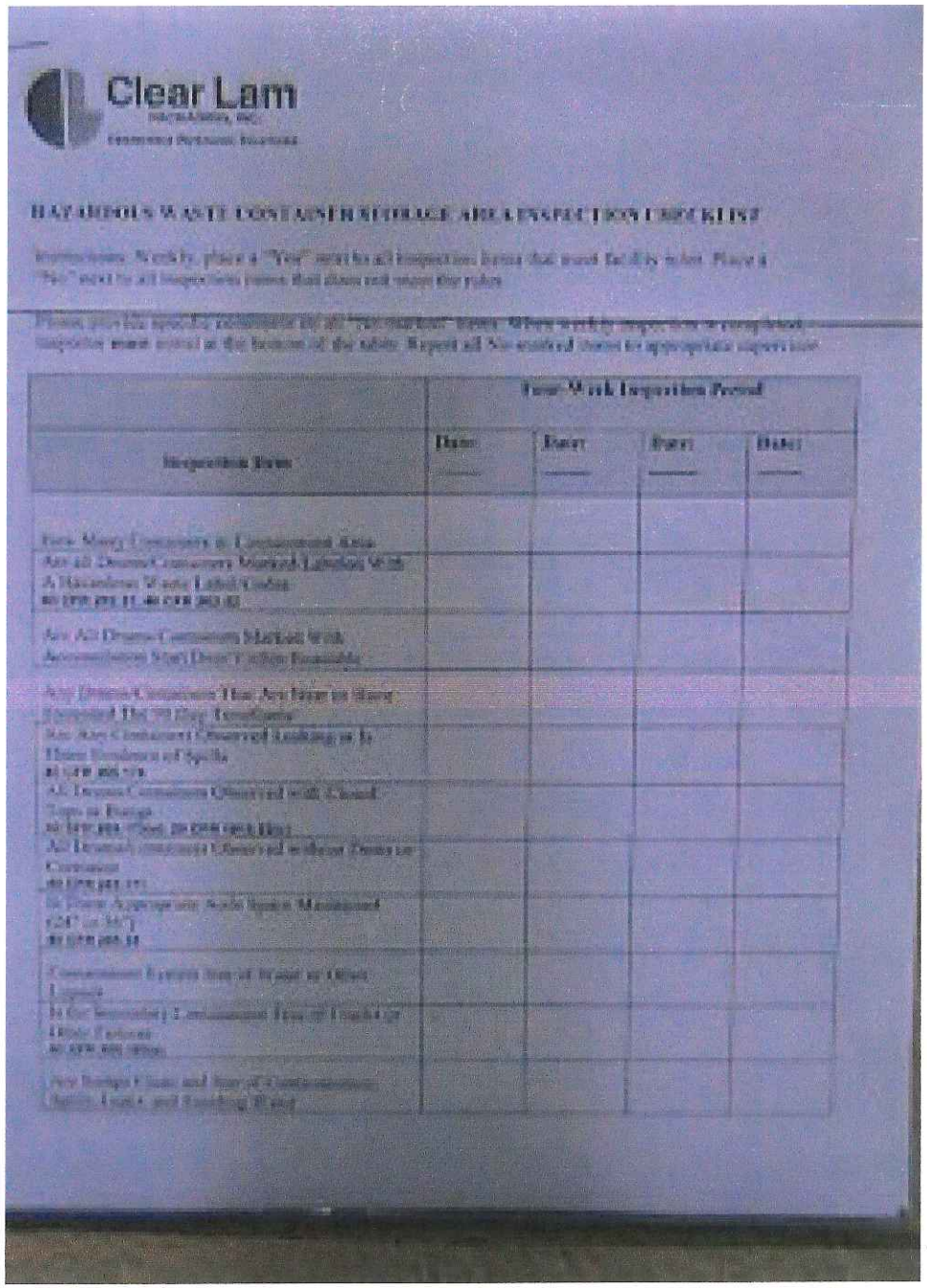


Exhibit 6

Exhibit 7

CERTIFICATE OF COMPLETION

This certifies that

Thomas E Cozza

has completed 3.1 CEU (31 hours) of training on the RCRA hazardous waste regulations.

Courses completed are entitled:

RCRA Fundamentals
Critical Generator Issues
Advanced RCRA Topics I
Advanced RCRA Topics II and Land Disposal Restrictions I
Land Disposal Restrictions II

Training provided by

McCoy and Associates, Inc.

July 21, 22, 23, 24 & 25, 2008

Denver, Colorado

Signature of Instructor

Signature of Instructor

Exhibit 7

Home
About Us
Training
Schedule
Publications
Seminar Registration
Book Orders
Contact Us
FAQs
Links to Other Sites

Training

McCoy and Associates has been providing RCRA training from coast-to-coast for more than 15 years. We conduct both public and in-house seminars and have trained thousands of environmental professionals so that they can better understand and comply with the RCRA hazardous waste regulations.

Why should you attend a McCoy seminar?

We offer the best RCRA training available anywhere. Our instruction includes:

- Well-organized modules for easier learning;
- Knowledgeable, experienced McCoy instructors who are really good at explaining the hazardous waste regulations;
- Outstanding course materials—great standalone references to the hazardous waste regulations that you'll refer to again and again;
- Comfortable learning environment at one of our hand-picked seminar sites with delicious group lunches; and
- Complimentary post-seminar support—call or email one of our instructors after the seminar, and get helpful information or guidance on your situation; and
- A McCoy guarantee for your satisfaction.

Who should attend?

Our courses will help hazardous waste generators, environmental managers, TSD facility operators, environmental consultants, compliance specialists, environmental attorneys, and regulators understand and comply with the hazardous waste regulations.

Which seminar should I attend?

We offer two seminar formats, a five-day course on the federal RCRA regulations and a two-day RCRA Refresher. Both formats cover the same RCRA topics, however, the five-day course offers more time for class discussion and numerous case studies and examples. The two-day Refresher is a faster-paced course designed to fit your schedule and provide a comprehensive review of RCRA.

Our RCRA 5-Day Seminar format has been developed so each training day is self-contained. This allows you to customize your training by signing up for only those days that meet your needs. The complete five-day program provides a thorough and in-depth explanation of the RCRA regulations. Our schedule page provides details on our seminar locations and dates.

RCRA 5-Day Seminar

For detailed information on the topics covered, click on each day below.

- **Day 1:** RCRA Fundamentals - Avoiding the Most Common Mistakes In Waste Identification
- **Day 2:** Critical Generator Issues
- **Day 3:** Advanced RCRA Topics I
- **Day 4:** Advanced RCRA Topics II and Land Disposal Restrictions I
- **Day 5 (1/2 day):** Land Disposal Restrictions II and RCRA Rules Under Development

2008 Registration Fee:
1 day - $500; any 2 days - $990; any 3 days - $1,400;
any 4 days - $1,700; all 5 days - $1,950; Register now for our five-day seminar.

RCRA Refresher Seminar

Our two-day Refresher targets experienced environmental professionals who need to review or

update their RCRA training. This fast-paced course provides a comprehensive review of the hazardous waste regulations and includes concise summaries of recent regulatory changes and new EPA guidance.

2008 Registration Fee:
$990. **Register now** for our RCRA Refresher seminar.

Certification

After completing the seminar, you'll receive a McCoy certificate indicating hours attended, seminar dates and location, and continuing education units (CEUs) awarded. In addition, certification maintenance (CM) points for certified hazardous materials managers/industrial hygienists, and limited continuing legal education (CLE) credits are available.

Regarding CLE credits, McCoy and Associates is accredited in California, Colorado and Texas. However, acceptance of and the ability to transfer CLE credits varies in each state. To obtain the most accurate information, please contact the Board of Continuing Legal and Judicial Education or Bar Association in your state.

McCoy and Associates, Inc., 12596 West Bayaud Avenue, Suite 210, Lakewood, CO 80228
Phone: 303-526-2674, Fax: 303-526-5471, e-mail: info@mccoyseminars.com

Exhibit 8

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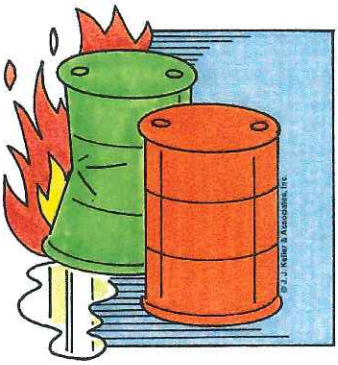
Training Practices

Handbook for



Hazardous

Waste

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CONTAINER MANAGEMENT PROCESS

BEST TRAINING PRACTICE

The following sections explain how to successfully manage hazardous wastes in containers. All relevant regulations are identified and explained. From these sections, we will...

A. Learn why waste characterization, or identifying and understanding hazardous waste, is important.
B. Learn how to select and label containers.
C. Learn methods to safely manage containers of hazardous waste.

WASTE CHARACTERIZATION

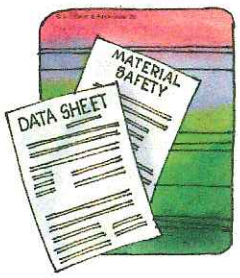
To safely manage hazardous waste, we must know exactly what a waste is, how it will act, and what its properties are. Is the waste extremely toxic? Do workers need special protection? Is the waste corrosive, will it corrode certain types of containers? Is the waste incompatible with other wastes -- will it react (explode, catch on fire) if it is mixed with another waste or water? Once a waste is generated, it should be characterized, ***before*** we place the waste in a container.

Waste characterization can be done by either:

1) Sampling and analyzing the waste, or

2) Identifying the waste based on process knowledge (we know the constituents in the process and therefore we can use that knowledge to determine if the resulting waste has characteristics that could make the waste hazardous).

Tips for Waste Characterization



1) Look at a material safety data sheet (MSDS) if it is available. Some information areas on the MSDS to look for are physical property, reactivity, fire and explosion hazard, and special protection information.

2) If a product being used in a process meets one or more hazardous characteristics, the waste generated may exhibit some of the same characteristics.

3) Be aware of any changes in a production process which could alter the composition of the waste generated.

Tips for Waste Characterization of Containerized Waste

1) Pay attention to marking/labeling which may indicate that a material is flammable, corrosive, etc.

2) Always check before handling unknown drums, or drums which you feel are labeled or marked incorrectly.

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3) Look at a material safety data sheet (MSDS) if it is available.

4) If waste is in a plastic drum it is a good indication the waste may be corrosive.

Special methods and equipment may be required to manage wastes which are:

1) Corrosive
2) Combustible
3) Flammable
4) Oxidizer
5) Poison
6) Toxic
7) Reactive

§265.177 -- Special requirements for incompatible wastes (a) Incompatible wastes, or incompatible wastes and materials (see appendix V for examples), must not be placed in the same container, unless 265.17 (b) is complied with.

Putting Waste in Containers - Reactive or Incompatible Wastes

Through waste characterization, you learn if a waste is reactive or incompatible with other wastes. Before putting waste into a container it is necessary to identify and segregate wastes if they are incompatible and/or reactive. **This is important!!** ***Incompatible and/or reactive hazardous wastes must be stored in a manner to prevent fires or explosions.***

The regulations state that incompatible wastes cannot be placed in the same container, unless we comply with other requirements found in §265.17 (b). This prevents the wastes from reacting with each other (e.g., exploding, catching on fire).

The best management practice for incompatible wastes is to store them separately. It is safer and easier to simply put incompatible wastes in separate containers and separate storage areas.

§265.17(b) ...the mixture or commingling of incompatible wastes, or incompatible wastes and materials, must be conducted so that it does not:

(1) Generate extreme heat or pressure, fire or explosion, or violent reaction;

(2) Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health;

(3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions;

(4) Damage the structural integrity of the device or facility containing the waste; or

(5) Through other like means threaten human health or the environment.

The regulations allow us to put incompatible wastes in the same container, under the conditions found in §265.17(b) **(Warning: *"Always talk to your supervisor or environmental coordinator before mixing any materials or wastes"*).** If we have to mix incompatible wastes in the same container we must make sure that the wastes won't react. This means that we must:

1) Keep the waste from becoming too hot (*this will prevent fire or explosions*);

2) Keep the wastes from producing toxic and/or flammable mists, gases, fumes, or dust (*this will prevent workers from being exposed to the waste and will prevent fire or explosions*);

3) Make sure that mixing the incompatible wastes won't damage the container – the container won't rupture or bulge; and

4) Demonstrate that mixing the wastes won't threaten workers, or the environment in any way.

CONTAINER SELECTION

Once the waste has been characterized and we know if the wastes are incompatible or reactive, we then can select an appropriate container. When selecting a container consider the amount of waste and type (characteristic) of waste. First, we should consider the amount of waste we have -- it makes more sense to put 20 to 25 gallons of waste into a 30-gallon drum rather than a 55- gallon drum. On the other hand, a 55-gallon drum is better for storing contaminated gloves/coveralls.

§265.172 Compatibility of Waste with Container. The owner or operator must use a container made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.

When selecting the container we must make sure that a waste won't react with the ***container*** itself. For example, highly corrosive wastes will react with a steel drum -- the drum may fail and waste may be released. How can we safely store corrosive wastes? Use plastic, or plastic-lined, steel drums to safely store corrosive wastes. To prevent drum failure, carefully **"match" the right waste with the right container**.

Tip for Container Selection

Consult a corrosion resistance guide to determine if the container and waste are compatible. *Match the waste with the correct type of container.*

§265.177 Special requirements for incompatible wastes (b) Hazardous waste must not be placed in an unwashed container that previously held an incompatible waste or material (see appendix V for example), unless 265.177 (b) is complied with.

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There's one more thing to think about when selecting a container. We can put waste into unwashed containers that have held incompatible wastes, under regulation §265.177(b). **But**, we must make sure that we meet the conditions specified in §265.17 (b) (See page 6). If a container has been used to store waste or other materials, we are required to make sure that:

1) The waste/material previously held in the container is compatible with the waste we are going to put in the container.

TIPS for Safely Putting Wastes in Containers

1) Make sure we know which wastes are reactive and/or incompatible. Keep these wastes away from each other. Put them in separate containers.

2) Make sure the container cannot be harmed by the waste.

3) If we rinse out containers onsite, be aware that rinse water generated from drum washing must be contained and characterized prior to disposal.

4) If we frequently reuse containers, consider "assigning" wastes to certain containers. This will allow us to reuse the container without washing.

5) Use a funnel to prevent spills, and do not use the same funnel for all wastes.

6) Certain chemicals may need room for expansion, or they may require zero headspace depending on the characteristics of the waste and storage conditions (e.g., temperature fluctuations)

7) Don't push, roll, or drag containers. Use the right equipment to move the drum.

8) Make sure the drums are easy to reach – keep an open aisle space so that people and equipment can move freely.

9) Don't drive equipment (trucks, forklifts) into container storage.

10) Keep the containers in a "containment area" to hold spills. Containment can be provided by dikes, berms, or walls.

Marking & Labeling Containers

Hazardous waste generators can only accumulate or store waste on-site for less than 90 days without a permit. The 90-day limit starts the moment the container is full.

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ACCUMULATION

START DATE

CONTENTS

HANDLE WITH CARE!

CONTAINS HAZARDOUS OR TOXIC WASTES

§262.34(a)(2) The date upon which each period of accumulation began is clearly marked and visible for inspection on each container.

§262.34(a)(3) While being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste"...

We must be able to prove to inspectors that we are not exceeding the time limit for accumulation. The regulations require that we clearly mark on the container the date hazardous waste completely filled the container. In addition, we must clearly mark all containers holding hazardous waste with the words "HAZARDOUS WASTE".

Besides the required markings, we will have to comply with all Department of Transportation (DOT) labeling requirements on the container before the waste can be shipped off site. The DOT label exactly identifies the waste, including name, characteristics, and handling requirements. *(More specific information on DOT labeling can be found in 49 CFR Part 172)*

Tips for Marking/Labeling Containers

1) Personnel should use the same method (e.g., handwritten, prepared labels) to label containers. Make sure all handlers know what the markings mean.

2) Besides the start date and the words "Hazardous Waste," include information about contents (e.g., toxic, reactive, incompatible).

3) Apply DOT labels to the container when waste is first placed in the container. The label will be in place for shipment and provides information about the waste to drum handlers.

4) Before reusing containers, make sure all old markings/labels are washed off or blacked out.

Satellite Accumulation Points

It is important to mention satellite accumulation points (SAP) before discussing the requirements for managing hazardous waste at less than 90-day areas.

262.34(c)(1) A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in 261.33(e) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) of this section provided he: (i) Complies with 265.171, 265.172, and

265.173(a) of this chapter; and (ii) Marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers. (2) A generator who accumulates either hazardous waste or acutely hazardous waste listed in 261.33(e) in excess of the amounts listed in paragraph (c)(1) of this section at or near any point of generation must, with respect to that amount of excess waste, comply within three days with paragraph (a) of this section or other applicable provisions of this chapter. During the three day period the generator must continue to comply with paragraphs (c)(1)(i) through (ii) of this section. The generator must mark the container holding the excess accumulation of hazardous waste with the date the excess amount began accumulating.

We can store up to 55 gallons of hazardous waste (or up to 1 quart of acutely hazardous waste) at a SAP for an unlimited amount of time and following only some of the requirements for 90-day areas. To store waste at a SAP you must simply:

1) Keep the containers in good condition;

2) Make sure the waste is compatible with the container; and

3) Keep containers closed when not adding or removing waste. Make sure we handle the containers properly to prevent leaks or spills.

4) Mark container with words "Hazardous Waste" or words which identify the contents. Because of fewer requirements, facilities like to designate storage areas as SAPs. This can be a problem. The definition of a SAP is specific. SAPs can **only** be located at or near the point of waste generation (where the waste is generated) ***AND*** the SAP has to be under the control of the person generating the waste. To be a SAP a storage area must:

1) Only accumulate waste generated at the SAP-- SAPs can't be used as temporary staging areas for wastes collected from other areas; and

2) Be located as near the point of generation as safety allows. For example, lab wastes may be accumulated in safety cans in the lab.

If you accumulate in **excess** of 55 gallons of hazardous waste or one quart of acutely hazardous waste at a SAP you must:

1) Mark the container holding the excess accumulation of hazardous waste with the date the excess amount began accumulating.

2) Move the container holding the excess accumulation to a container storage area within 3 days. If we incorrectly manage a 90-day storage area as a SAP, our company will be in violation of the regulations.

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MANAGING CONTAINERS AT 90-DAY AREAS

The moment that waste is placed in the container, containers holding hazardous waste must be managed to prevent spills of hazardous waste.

Keeping Containers in Good Condition

§265.171 Condition of containers If a container holding hazardous waste is not in good condition, or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the requirements of this part.

One of the easiest ways to prevent spills is to make sure that containers are kept in good condition -- both before the waste is put in the container and while we are managing the container. What does good condition mean?

1) Containers must be free of dents and corrosion -- these weaken the container.

2) Containers must not leak -- the container must be structurally sound.

3) Containers must not bulge. If we find any of these problems, we must transfer the waste from the "problem" container to a sound container.

Managing Filled Containers

§265.173 Management of containers (a) A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.
(b) A container holding hazardous waste must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.

How can we keep containers in good condition?

Our company has written procedures for managing containers. All employees are trained in these procedures. At a minimum, we must:

1) Keep containers closed at all times, except when we are adding or removing waste from the container;

2) Be careful when we are handling the containers. We must open, handle, and store containers to prevent ruptures or leaks. For example, use drum grapplers to lift and move drums -- don't hand-roll the drums from one area to another; and

3) If the container begins to leak, or we notice dents or bulges, transfer the waste to another container.

We must also prevent reactions of ignitable and/or incompatible wastes. EPA developed three special management requirements for these wastes:

1) Incompatible wastes must be physically separated

2) Store ignitable and/or reactive wastes at least 50 feet from your property line

3) Manage ignitable and/or reactive wastes to prevent fire and/or explosions.

Managing Incompatible, Ignitable and/or Reactive Wastes

§265.177 A storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device.

Physically separate containers holding incompatible wastes from other wastes or materials. Store the containers in an area surrounded by a berm, dike, wall, or other physical structure. Keep incompatible wastes from contacting/reacting with other wastes and materials.

§265.176 Special requirements for ignitable or reactive waste Containers holding ignitable or reactive waste must be located at least 15 meters (50 feet) from the facility's property line. Keep incompatible wastes from contacting/reacting with other wastes and materials

Store ignitable and/or reactive waste at least 50 feet from the property line of the facility and locate these wastes well within the property boundaries which provide two safeguards:

1) Reduces the risk of the general public reaching/contacting the waste or being harmed in an explosion; and

2) If a release of hazardous waste does occur, this will help prevent the waste from migrating offsite.

§265.17(a) The owner or operator must take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. This waste must be separated and protected from sources of ignition or reaction including but not limited to: Open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat producing chemical reactions), and radiant heat. While ignitable or reactive waste is being handled, the owner or operator must confine smoking and open flame to specially designated locations. "No Smoking" signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste.

Manage ignitable and/or reactive wastes to prevent fire and/or explosions. At a minimum we must keep ignitable and/or reactive wastes away from:

1) Fire;

2) Hot surfaces like operating machinery, engines;

3) Radiant heat or sunlight;

4) Cutting and welding operations;

5) Frictional heat -- keeps drums stationary, don't pull drums along on the ground;

6) Sparks from static electricity, electrical operations, or friction; and

7) Some reactive wastes must be kept away from water.

Finally, smoking is ban in all areas that manage ignitable or reactive wastes, especially when wastes are being transferred/placed into containers.

"NO SMOKING" signs must be posted at all areas near ignitable or reactive wastes.

Tips for Safely Managing Containers

1) Use a funnel or hose to add or transfer wastes to drums. This will prevent spills. Remember to rinse the funnel and characterize the rinse water (a dedicated funnel would not have to be rinsed).

2) If we notice a leak, or a container is in poor condition, transfer the waste to a new container immediately.

3) Keep containers cool and dry.

4) Make sure all container storage areas are clearly marked -- keep ignitable/reactive wastes in their own area.

5) Don't stack ignitable/ reactive wastes.

6) Make sure to open and close steel drums with a spark proof bung wrench.

7) Don't push, roll, or drag containers. Use the right equipment to move the drums.

8) Make sure the drums are easy to reach -- keep an open aisle space so that people and equipment can move freely.

9) Don't drive equipment (trucks, forklifts) into container storage.

10) Keep the containers in a "containment area" to hold spills. Containment can be provided by dikes, berms, or walls. *Use a funnel to add or transfer wastes to drums. Remember when not in use to keep funnel covered or closed*

§265.174 Inspections The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

3. INSPECTING CONTAINERS

Container storage areas must be **inspected weekly**. Inspections protect us, and the public -- through inspections, we can stop spills ***before*** they happen. Our company has developed and maintains a standard inspection checklist to be used during every weekly inspection. The checklist is detailed and address's the labeling and management procedures followed at within our facility. An example of this checklist is posted outside the hazardous storage room.

At a minimum, the inspection checklist covers:

1) Leaks or staining from containers;

2) Container condition, including dents, bulging, and/or corrosion;

3) Labeling -- start date, the words "Hazardous Waste" and other information; and

4) Management practices -- such as aisle space, drum stacking.

Inspections are detailed and methodical. Anyone doing inspections is trained.

Tips for Conducting Inspections

1) Follow the inspection checklist – make detailed notes if we find something wrong.
2) Be thorough. Check the tops of drums to look for waste residue or corrosion.
3) Walk all the way around containers – check entire storage area.
4) Check containment area for stains.
5) Note anything unusual in containment area -- even if it might not be a problem.
6) If problems are found, get the problem taken care of immediately.
7) Keep a logbook of the facility's inspection checklist.

Summary

This Training Practices Handbook for Hazardous Waste is written with the intent of helping to interpret the regulations pertaining to the handling and management of hazardous waste. The Handbook is not meant to act as a replacement for the regulations, but simply to give some practical examples of how to comply with them. Clear Lam Packaging must adhere to all the applicable regulations found in Title 40 of the Code of Federal Regulations.

The Handbook is structured so that it follows the typical path a hazardous waste might take from the time it is generated, until the container is ready to be sent offsite for disposal. The first, and most important task is for Clear Lam Packaging to determine the composition and characteristics of the hazardous waste. The next step is to use that knowledge regarding the characteristics of the waste, to choose a container which will be compatible with the waste. After the waste is containerized, it should be marked or labeled appropriately, and moved into a container storage area. Once the container is transferred to a container storage area, it must be inspected weekly and kept in good condition until it leaves the site. Clear Lam Packaging must consult the appropriate Department of Transportation regulations found in Title 49 of the Code of Federal Regulations prior to shipping hazardous waste containers offsite for disposal.

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HAZARDOUS WASTE CONTAINER STORAGE AREA INSPECTION CHECKLIST

Instructions: Weekly, place a "Yes" next to all inspection items that meet facility rules. Place a "No" next to all inspection items that does not meet the rules.

Please provide specific comments on all "No-marked" items. When weekly inspection is completed, inspector **must** initial at the bottom of the table. Report all No-marked items to appropriate supervisor.

	Four-Week Inspection Period			
Inspection Item	**Date:**	**Date:**	**Date:**	**Date:**
How Many Containers in Containment Area				
Are all Drums/Containers Marked/Labeled With A Hazardous Waste Label/Codes **40 CFR 262.31; 40 CFR 262.32**				
Are All Drums/Containers Marked With Accumulation Start Date/Visible/Readable				
Any Drums/Containers That Are Near or Have Exceeded The 90 Day Timeframe				
Are Any Containers Observed Leaking or Is There Evidence of Spills **40 CFR 265.174**				
All Drums/Containers Observed with Closed Tops or Bungs **40 CFR 265.173(a); 29 CFR 1910.22(c)**				
All Drums/Containers Observed without Dents or Corrosion **40 CFR 265.171**				
Is There Appropriate Aisle Space Maintained (24" or 36") **40 CFR 265.35**				
Containment System free of Water or Other Liquids				
Is the Secondary Containment Free of Cracks or Other Failures **40 CFR 265.193(a)**				
Are Sumps Clean and free of Contamination, Spills, Leaks, and Standing Water				

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	Four-Week Inspection Period			
Inspection Item	**Date:** _____	**Date:** _____	**Date:** _____	**Date:** _____
Are Spill Kits Stocked				
Is The Emergency Eye Wash Station Functioning Properly				
Are The Emergency Communication Devices Operating Properly/Posted **40 CFR 262.34(d)(5)(ii)**				
Is Emergency Response Information Posted Near All Communication Devices				
Inspectors Initials				

Overall Comments: _____

_____

_____

_____

_____

_____

_____

_____

_____

_____

Reviewed by: _____ Date: _____

Note: State and Federal regulations require that this inspection be performed weekly.

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Monthly **Hazardous Waste Program Checklist**

1. Hazardous Waste: Container Management

Yes	No	N/A	
			Are hazardous waste containers and areas where they are stored inspected for leaks at least weekly? **40 CFR 265.174**
			Are hazardous waste containers holding ignitable or reactive waste stored at least 50 feet from the facility's property line? **40 CFR 265.176**
			Are hazardous waste containers in good condition? **40 CFR 265.171**
			Are hazardous waste containers not opened, handled, or stored in a manner which may rupture them or cause them to leak? **40 CFR 265.173(b)**
			Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste? **40 CFR 265.177(b)**
			Are incompatible hazardous wastes separated from each other by a berm, dike, wall, or other device? **40 CFR 265.177(c)**
			At closure, are all hazardous wastes and associated residues removed from the containment system? **40 CFR 264.178**
			Do you prevent incompatible wastes or materials from being placed in the same containers? **40 CFR 265.177**
			Does your storage area provide secondary containment for hazardous waste? **40 CFR 265.193(a)**
			Is each hazardous waste container kept closed, except when adding or removing waste? **40 CFR 265.173(a); 29 CFR 1910.22(c)**
			Is each hazardous waste container made of a material that will not react with the waste it stores? **40 CFR 265.172**
			Is there sufficient aisle space in the hazardous waste storage area to allow unobstructed movement of personnel and equipment? **40 CFR 265.35**

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2. Hazardous Waste: Emergency Response

Yes	No	N/A	
			Is emergency information posted in every area where you store hazardous waste? **40 CFR 262.34(d)(5)(ii)**
			Is the necessary emergency equipment for response to hazardous waste spills available (fire extinguishers, spill control supplies, absorbents, MSDS's)? **40 CFR 265.32; 40 CFR 265.51(a); 40 CFR 265.56(e)**
			Is there at least one employee on the premises or on call (i.e., available to respond to an emergency by reaching the facility in a short period of time) responsible for coordinating all applicable hazardous waste emergency response measures? **40 CFR 262.34(d)(5)(iv)**

3. Hazardous Waste: Shipping

Yes	No	N/A	
			Is DOT marking and labeling requirements for shipments of hazardous waste followed in accordance with 49 CFR 172? **40 CFR 262.31; 40 CFR 262.32**
			Is each hazardous waste container of 119 gallons or less marked in accordance with 49 CFR 172.304? **40 CFR 262.32(b)**
			Is hazardous waste packaged in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? **40 CFR 262.30**

4. Hazardous Waste: Storage

Yes	No	N/A	
			Do you store hazardous wastes in an aboveground storage tank (AST)? If yes, are all hazardous waste requirements complied with?
			If hazardous waste is stored on the grounds, are all hazardous waste requirements complied with?
			Is emergency information posted near a telephone? **40 CFR 262.34(d)(5)(ii)**

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			Is the necessary emergency equipment available (fire extinguishers, spill control supplies)? **40 CFR 265.32; 40 CFR 265.51(a); 40 CFR 265.56(e)**
			Is there at least one employee either on the premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility of coordinating all applicable emergency response measures? **40 CFR 262.34(d)(5)(iv)**

Inspected by: _____ Date: _____

Reviewed by: _____ Date: _____

Clear Lam Packaging, Inc.		
Document No. **SOP-1**	Revision: **1**	Page 1 of 1
Title: Hazardous Waste		
Approved by: Thomas E Cozza	Date: 03/01/2004	

Rev.	Date	Sections Affected / Description
Rev. 1	03/01/2004	Document Established
Rev 2	03/08/2008	Document Established

1.0 Purpose

The purpose of this procedure is to ensure that all Hazardous Waste is in compliance with EPA requirements.

2.0 Authority and Responsibility

It is the responsibility of the SSC Manager, along with all managers, supervisors, and group leaders to implement this procedure and to ensure the compliance with this procedure.

It is a responsibility of the Department Manager to ensure that all department employees are trained on this procedure with guidance from the SSC Manager.

3.0 Procedure

- All waste requires a "Hazardous Waste" label (provided) on each container. Waste labels are specific to stream (liquid, solid, rags) being generated. Use label w/authority# 129894 for solid, #129893 rags, and #129017 for liquid).

- Solid and rag stream's will be re-labeled during pick up. New labels will be provided by driver which will now include the specific manifest no.

- After pick up the manifest needs to be brought up to purchasing a.s.a.p. in order to fax over copy to Chem -Tel Inc. Chem -Tel will handle any calls if there should be an emergency during transportation. Chem.-Tel's phone number is listed on all our manifests.

- In addition purchasing will mail to IL. EPA a green copy of each manifest.

- If additional labels are needed then contact purchasing.

Rev.	Date	Sections Affected / Description
Rev. 1	03/08/2008	Document Established

1.0 Purpose

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It is a responsibility of the Department Manager to ensure that all department employees are trained on this procedure with guidance from the SSC Manager.

3.0 Procedure

Solvent less Waste

1. Waste from all departments (solid or rags) must be prepared and labeled correctly!
2. One drum must be maintained at Laminator #6 at all times for solvent less waste materials only!
3. The drum must be in good condition.
4. All the old labels must be spray painted with the exception on the UN # of the drum which identifies the drum.
5. The top of the drum must be painted over with red paint.
6. The drum must be labeled SOLVENT LESS ADHESIVE!
7. Red tape will be placed around the top of the drum.
8. The drum must be grounded all the time!

9. After the drums are full, the lamination personnel must make sure the drum is sealed and in good condition to be removed from the lamination department.

10. The drums must be stored in the ADHESIVE MIXING ROOM.

11. The Lamination Supervisor or Group Lead will notify the GC Lab when at least 4 drums are ready to ship.

12. Two drums will be maintained in the ADHESIVE MIXING ROOM.

13. One drum is for adhesive waste and the other for solvent waste.

14. Each drum must be labeled with the proper waste name and a flammable label with HMIS label.

Adhesive & Solvent Waste from Laminator

1. Lamination adhesive waste will have a yellow tape around the top of the drum.

2. Lamination solvent waste drum will have a blue tape around the top of the drum.

3. Rag drums will have a green tape around the top of the drum.

4. All the rag waste drums must be stored in the press department waste room.

5. All the waste coming out from the lamination department with adhesive and solvent must be put in 55 gal drums.

6. The drum must be in good condition.

7. All the old labels must be spray painted with the exception of the UN# of the drum which identifies the drum.

8. Two drums will be maintained in the Adhesive Mixing room.

9. One drum is for Adhesive Waste and the other for Solvent Waste.

10. Each drum must be labeled with the proper waste name.

11. After the drums are full, the lamination personnel must make sure the drum is sealed and it is in good condition to be removed from the lamination department.

12. The drums must be stored in the press waste room.

13. All drums must be free from liquid or dried residue.

14. If the drum has dried residue the drum must be black spray painted to cover the dried residue.

15. Drums must be in good condition with NO distortion, holes, or dents!

16. All drums must be spray painted to cover any labels on the drum except for the UN# of the drum. The UN# is the drum identification.

17. Drums must be labeled with the proper hazardous waste label and DOT diamond provided by the company.

18. The information on the hazardous waste label and DOT diamond must correspond to the waste in the drum.

19. Drum top must be in good condition with a tight fit!

20. Drum must be sealed and free of any possible leakage or spilling that could occur and safe to handle with common freight moving equipment.

21. Bolt on ring must be in down position with nut aligned correctly.

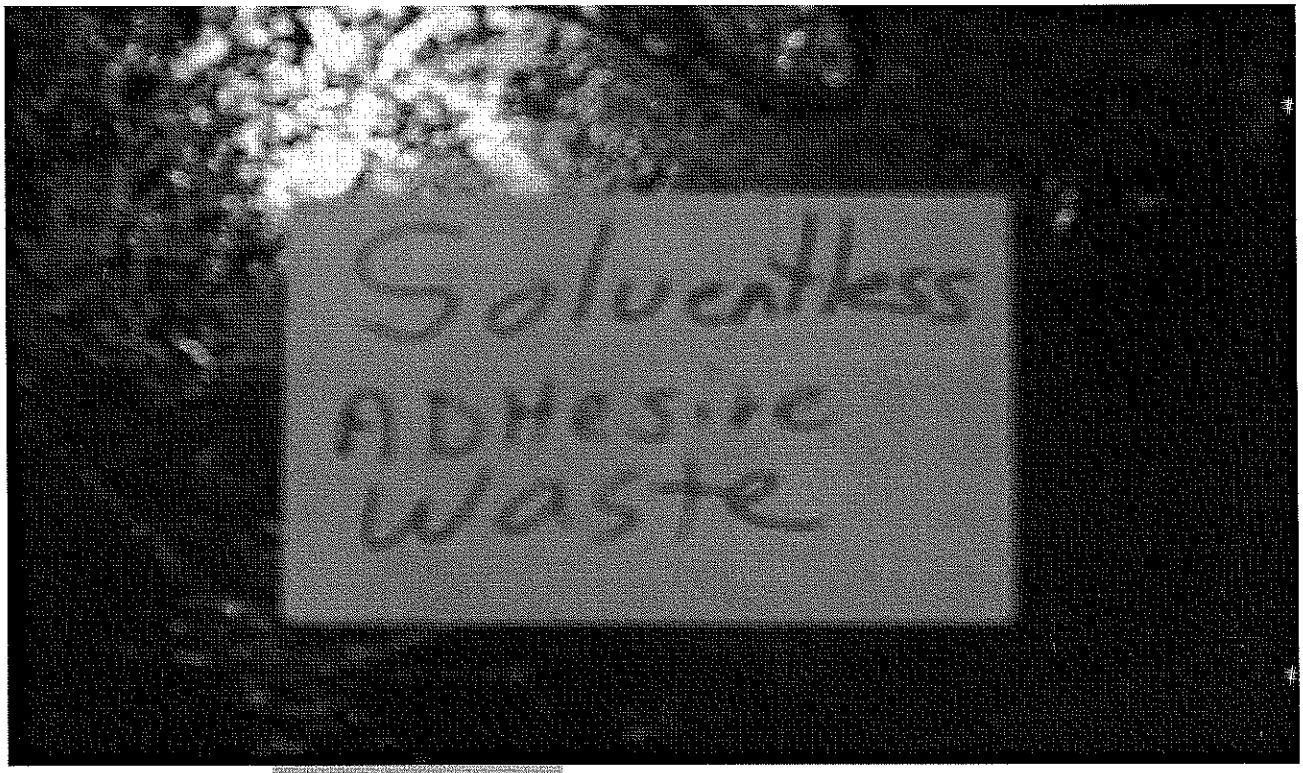
22. Bolt must be the appropriate size per manufacturers testing.

23. All drums must be on pallets and in good condition to be transported to the shipping dock.

24. Clear Lam Packaging personnel and the driver picking up the hazardous waste must complete the UNIFORM HAZARDOUS WASTE MANIFEST making sure all the waste is ready for shipment!

4.0 Documents

Forms used: See pictures attached



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: ILD984805317
2. Page 1 of: 1
3. Emergency Response Phone: 800-255-3924
4. Manifest Tracking Number: 000975500 FLE

5. Generator's Name and Mailing Address
CLEAR LAM PACKAGING, INC.
1950 PRATT BOULEVARD
ELK GROVE VILLAGE, IL 60007 847-439-8570

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

6. Transporter 1 Company Name: CLEAN STREAMS, INC.
U.S. EPA ID Number: IND984874602

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

8. Designated Facility Name and Site Address
GREENCASTLE WDF FACILITY
3301 S. COUNTY ROAD 150 WEST
GREENCASTLE, IN 46135 800-555-3485

U.S. EPA ID Number: IND006419212

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		
	RQ,WASTE FLAMMABLE LIQUID, N.O.S. (ACETONE, ETHYL ACETATE),3,UN1993,PGII,(F003)					F003	D001	
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
1)129017UPA207255

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 | Signature | Month | Day | Year

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

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name | Signature | 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:

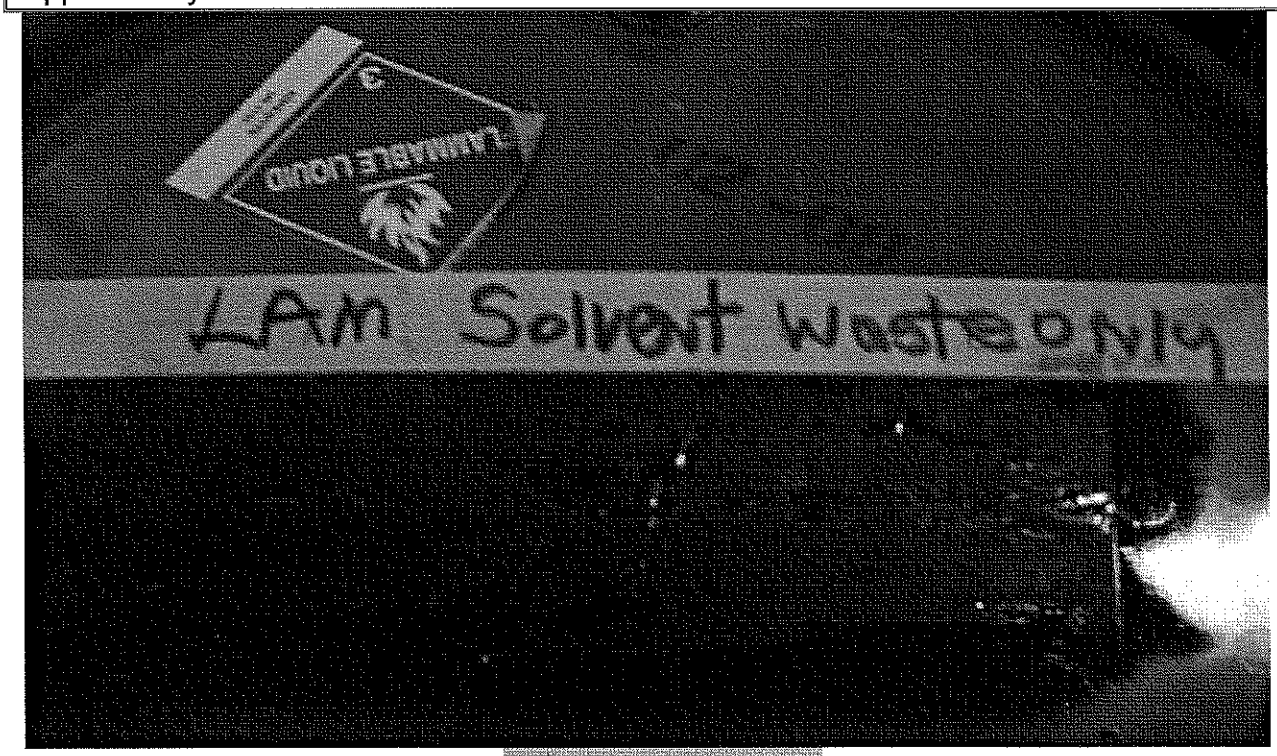
18c. Signature of Alternate Facility (or Generator) | Month | Day | Year

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

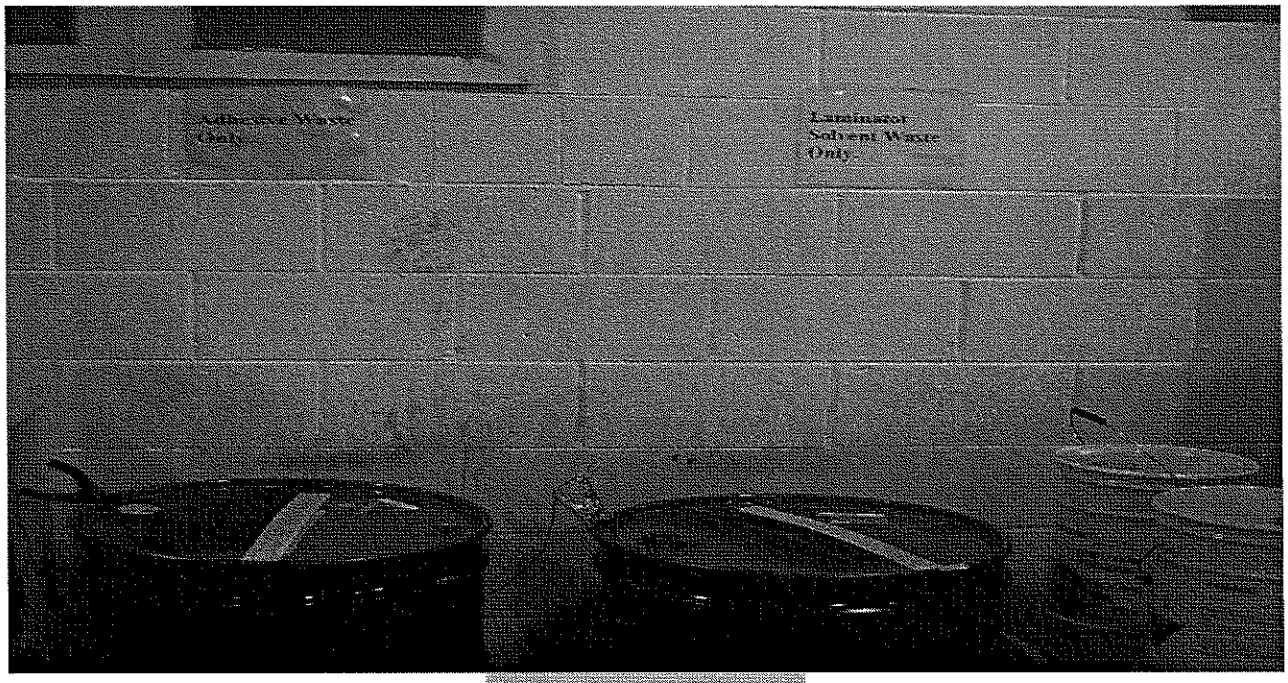
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name | Signature | Month | Day | Year

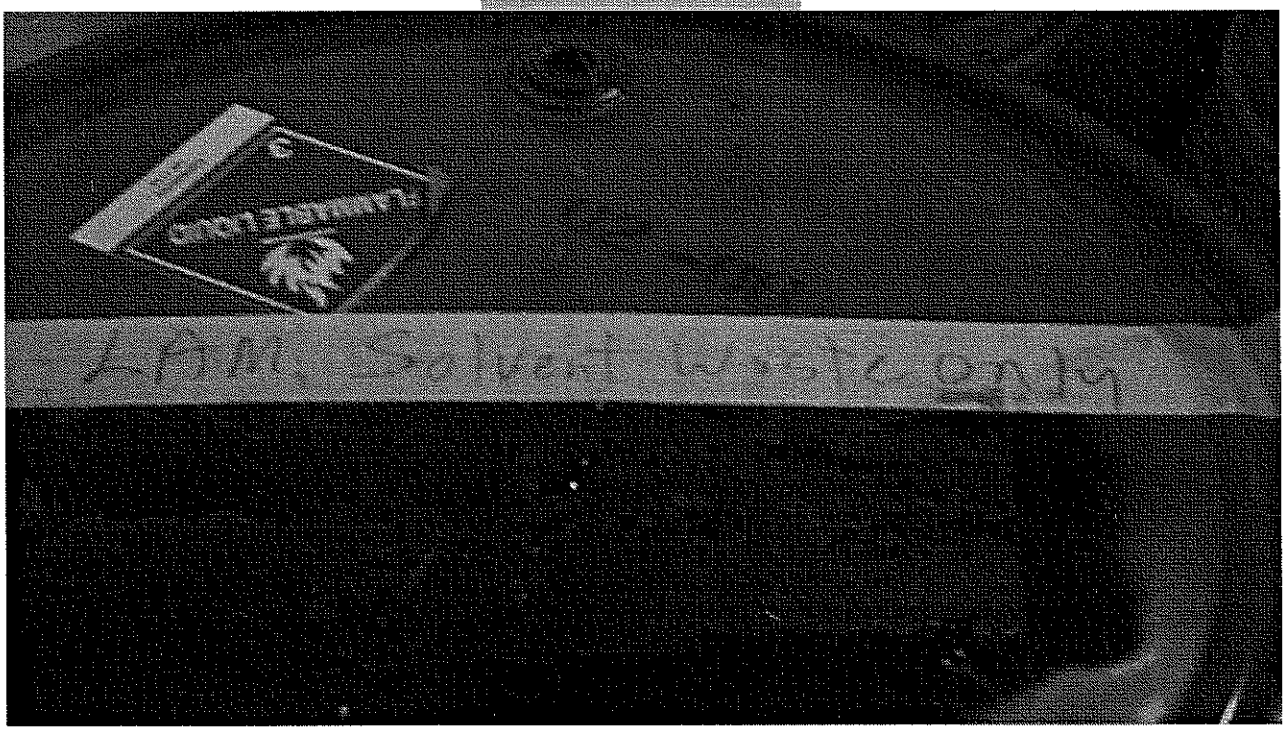
GENERATOR — INTL — TRANSPORTER — DESIGNATED FACILITY

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

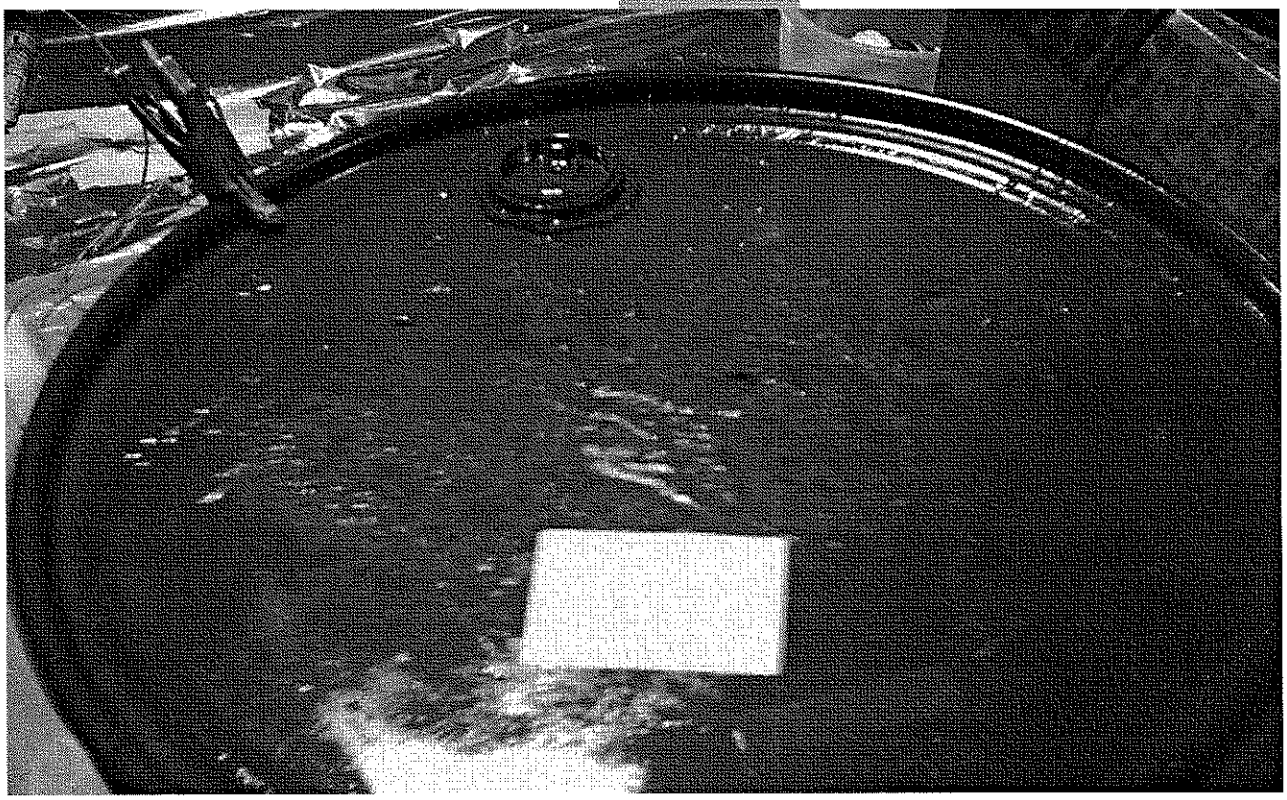

LAm Solvent Waste only

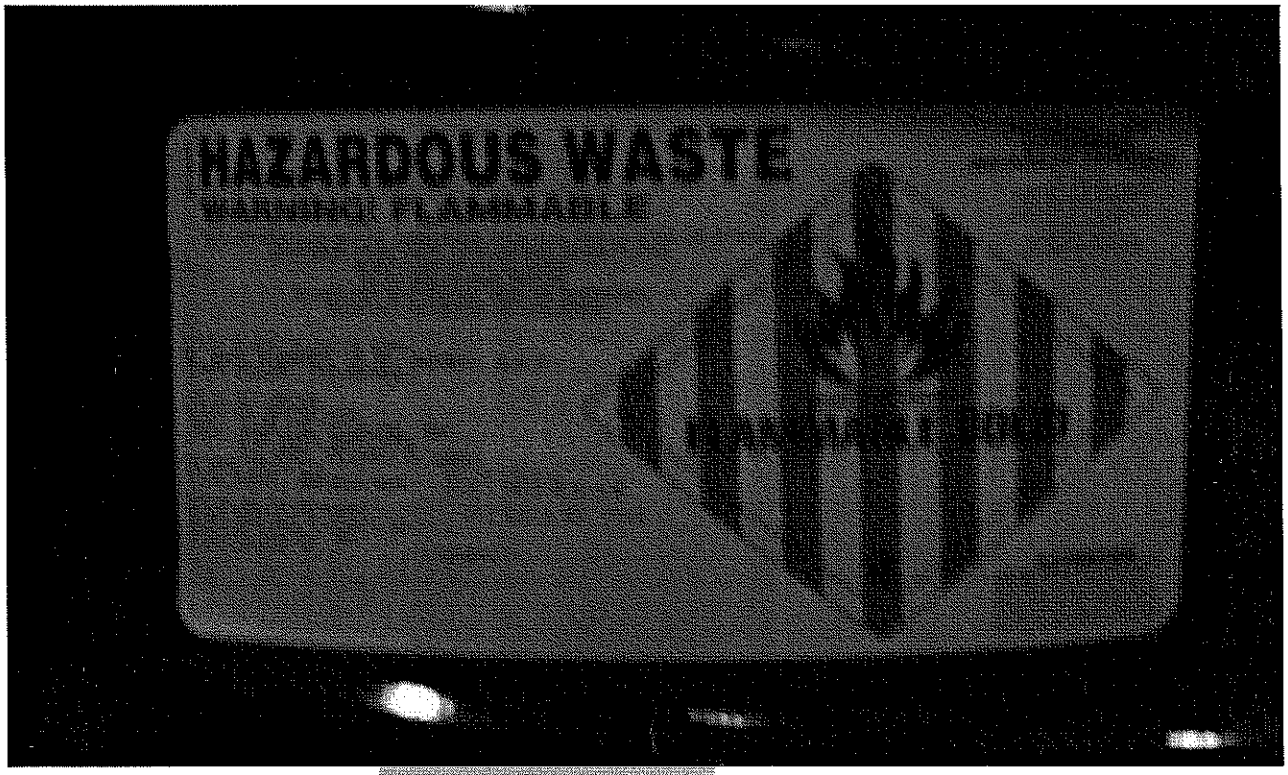

Lam ADHESIVE waste only

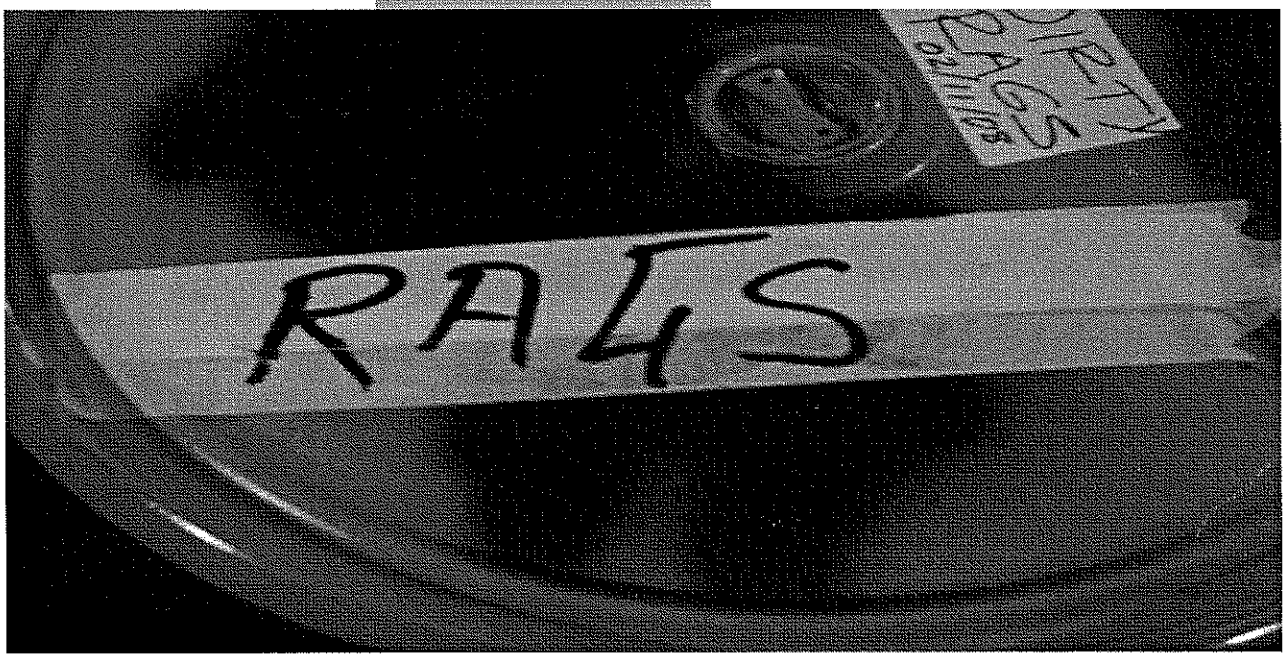

Adhesive Waste
Only
Laminator
Solvent Waste
Only

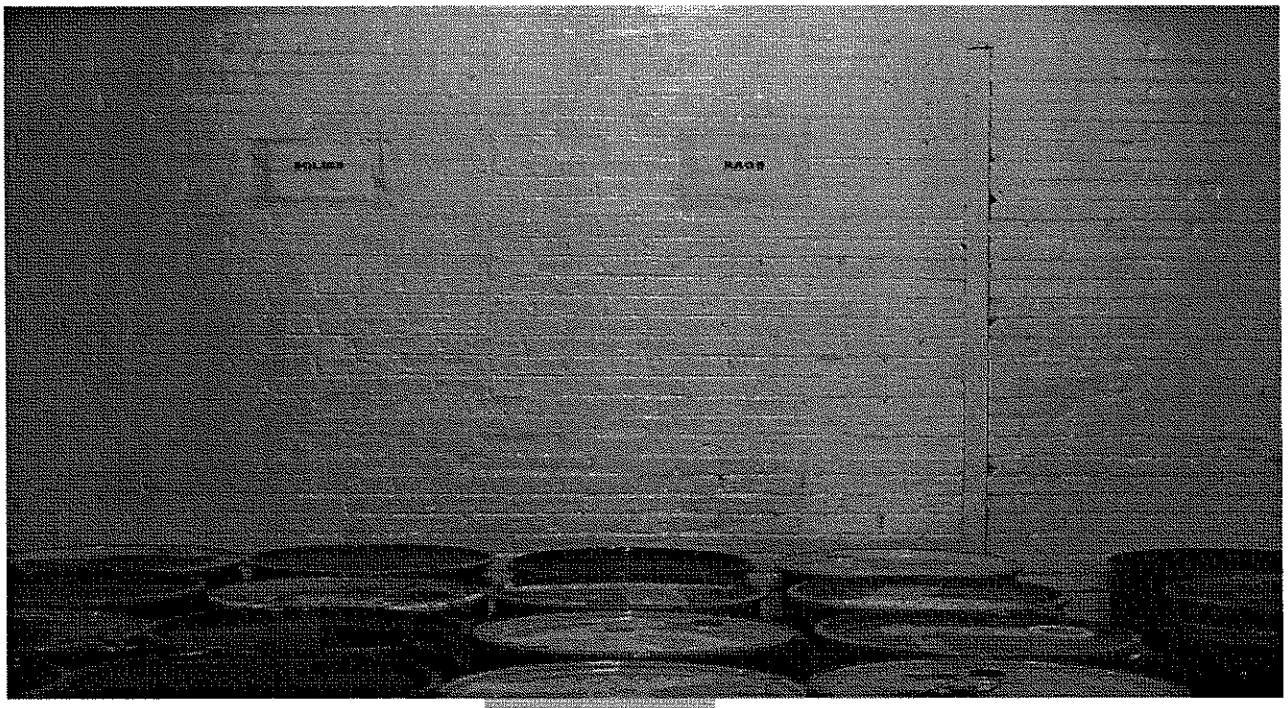



Solvent less
adhesive
waste

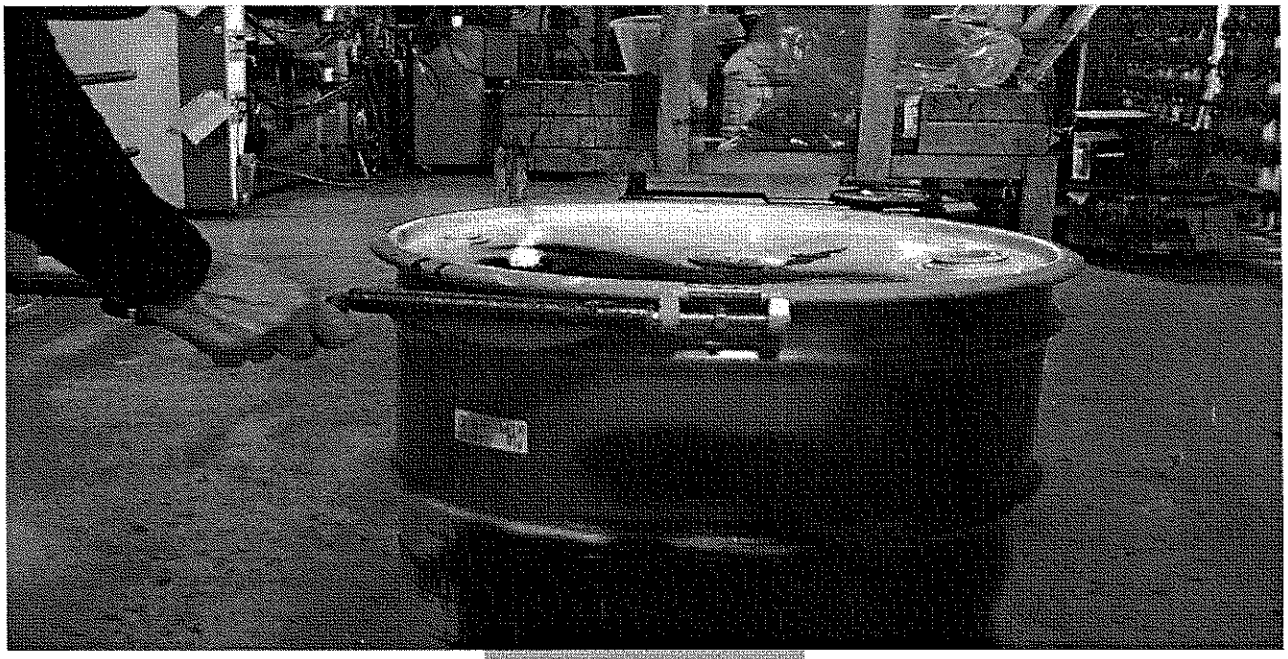


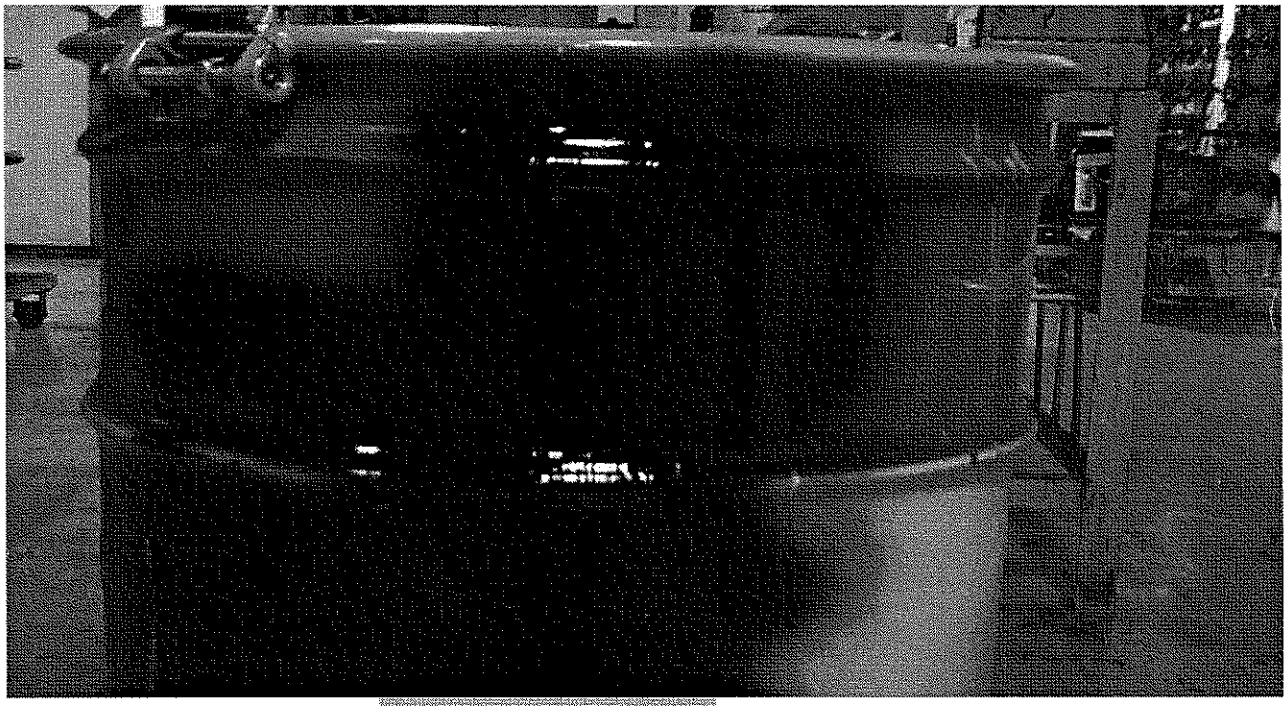

HAZARDOUS WASTE

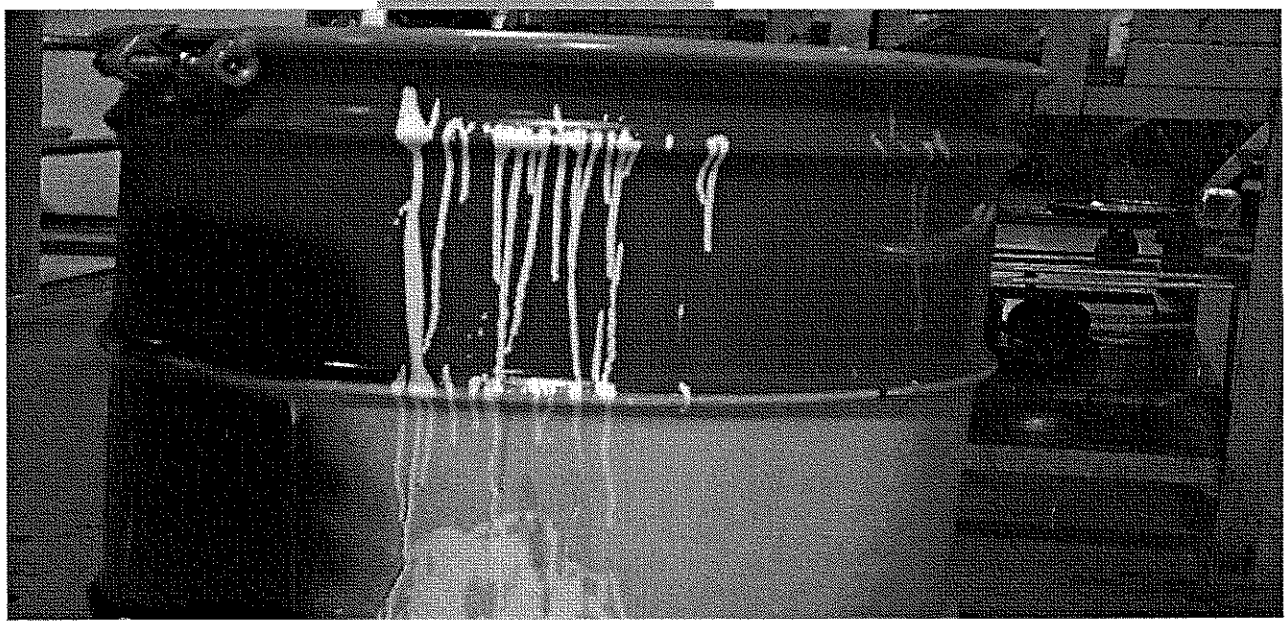

RAGS

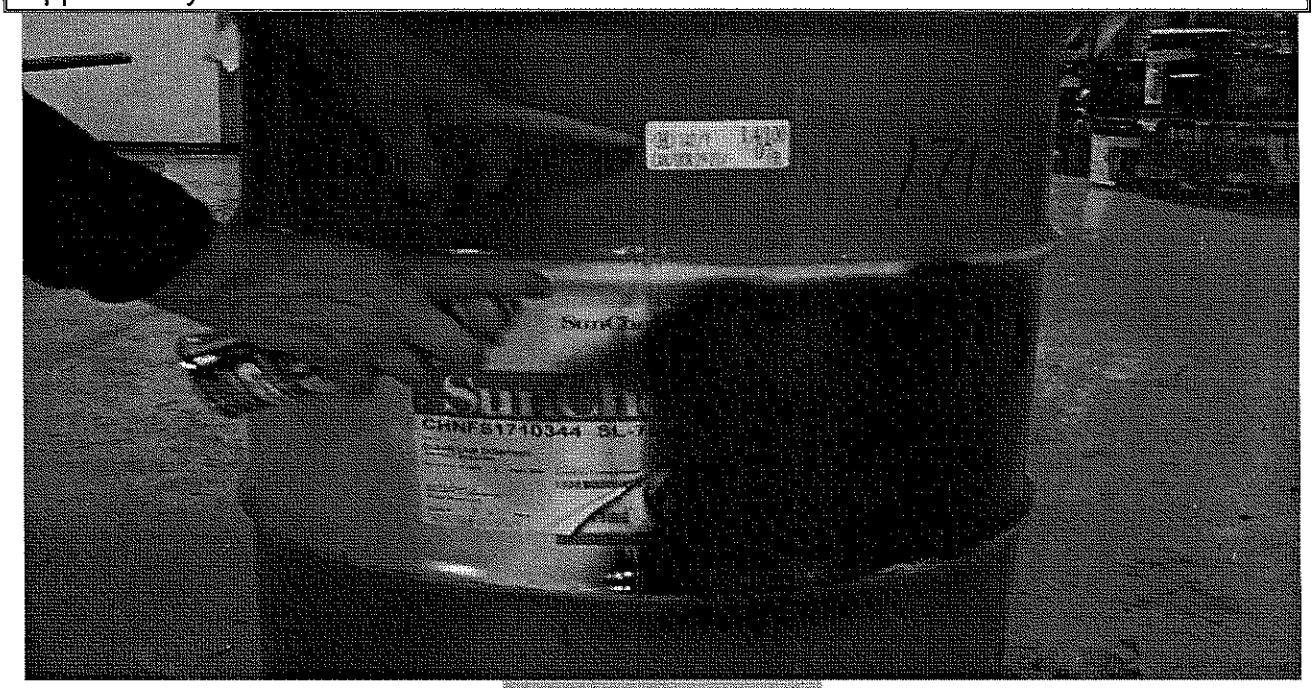



SOLIDS
RAGS









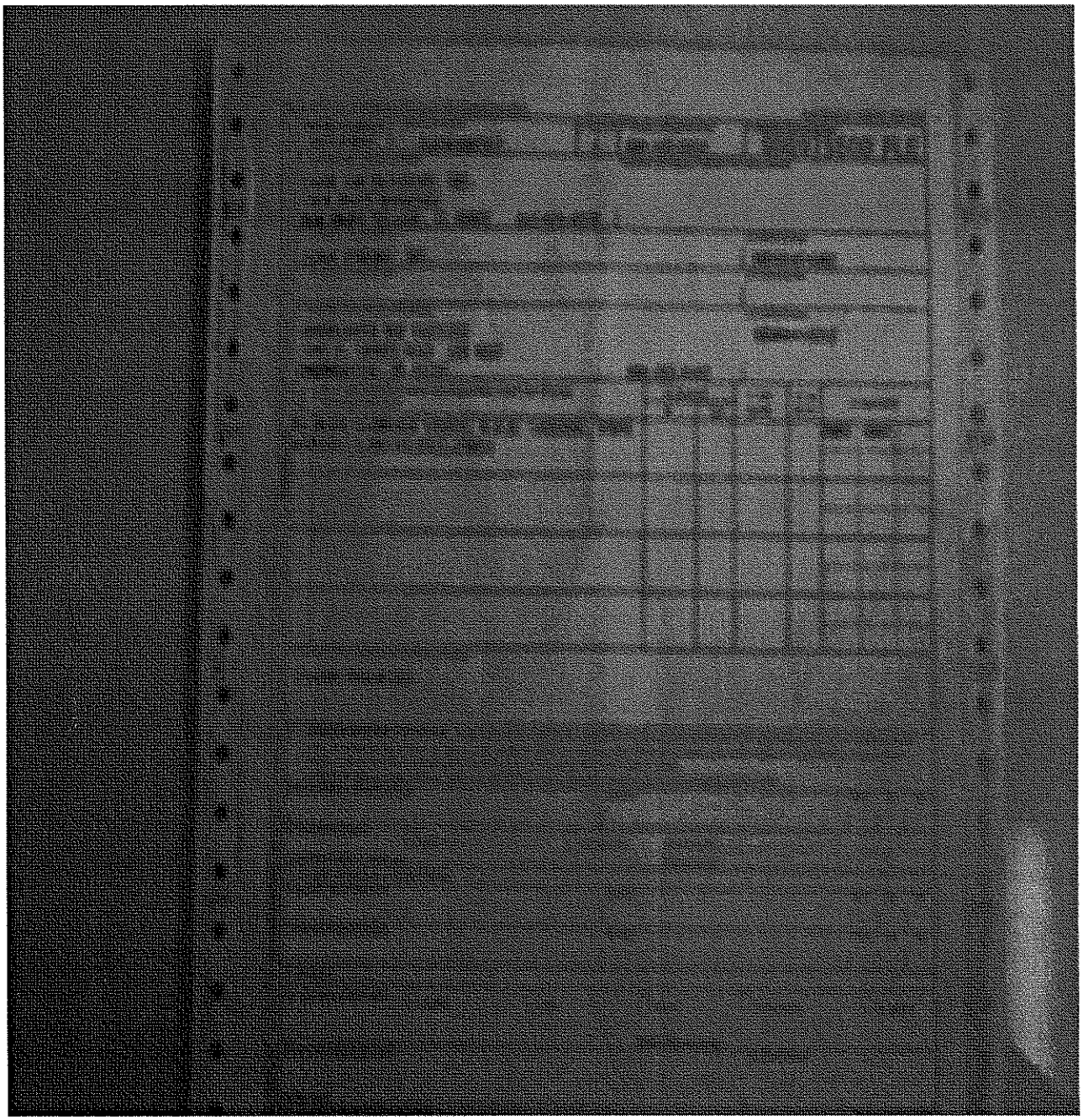
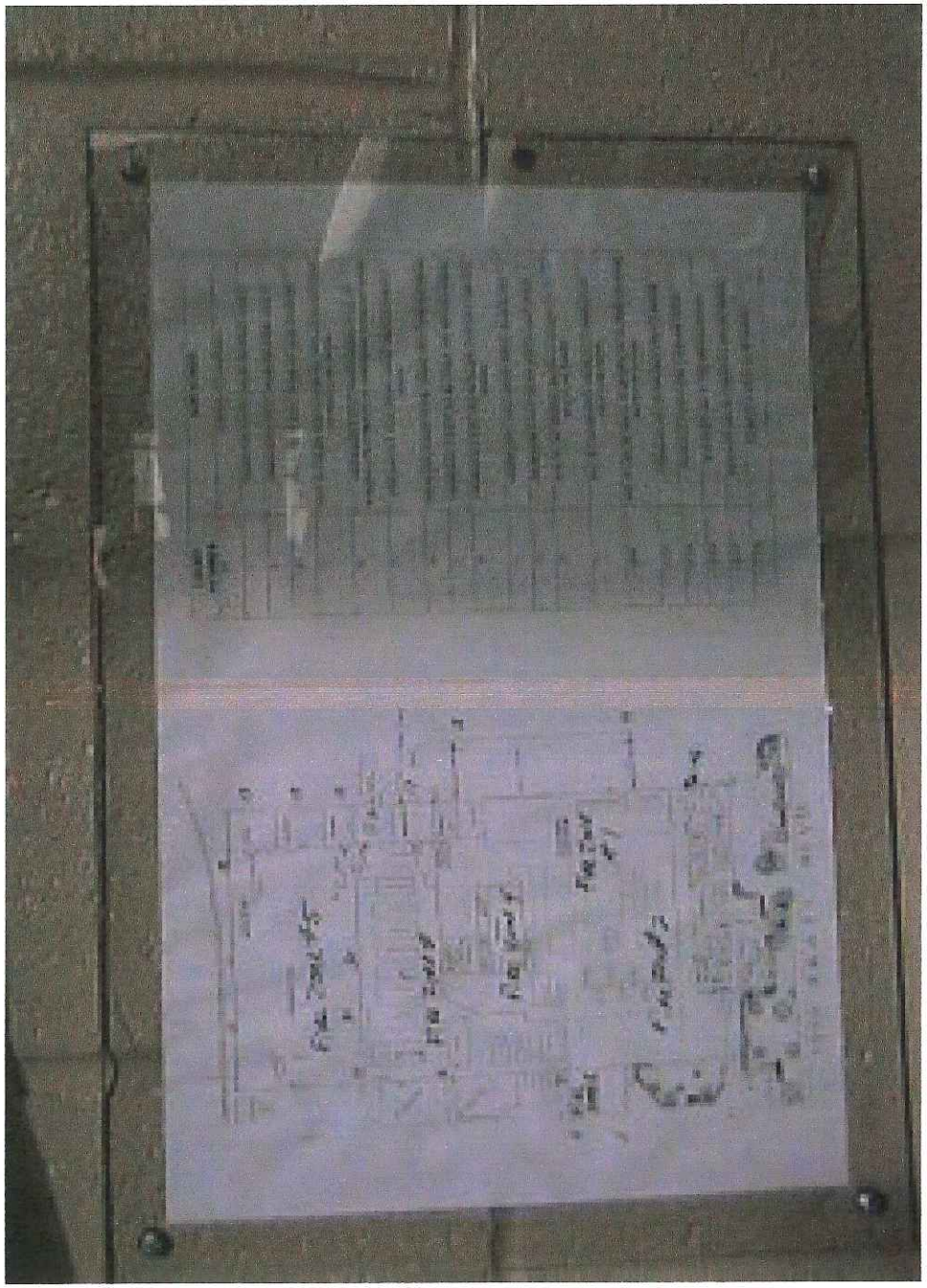
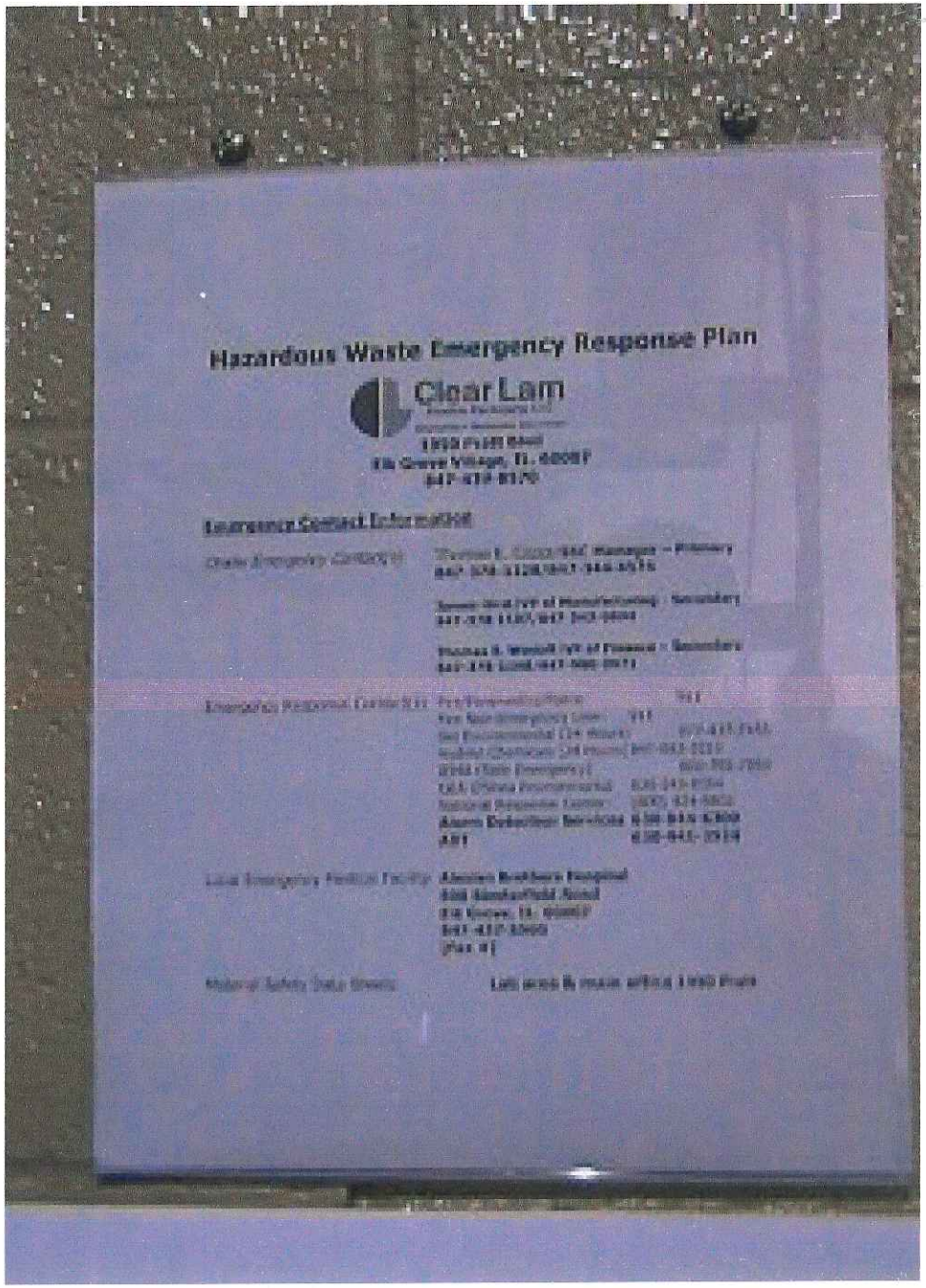


Exhibit 9





Hazardous Waste Emergency Response Plan

Clear Lam

Emergency Contact Information

Emergency Response Center 911

Local Emergency Medical Facility

Material Safety Data Sheets

Exhibit 9

Hazardous Waste Emergency Response Plan

Clear Lam
Flexible Packaging, LLC
ENGINEERED PACKAGING SOLUTIONS

1950 Pratt Blvd
Elk Grove Village, IL. 60007
847-439-8570

Emergency Contact Information

Onsite Emergency Contact(s)	Thomas E. Cozza/**SSC Manager – Primary** **847-378-1228/847-344-4574** **James Hirst/VP of Manufacturing - Secondary** **847-378-1197/847-343-0894** **Thomas Wedoff/VP of Finance – Secondary** **847-378-1168/847-980-0571**
Emergency Response Contact(s)	Fire/Paramedics/Police: 911 Fire Non-Emergency Line: 911 Set Environmental (24 Hours) 877-437-7455 Hydrite Chemicals (24 Hours) 847-992-2219 IEMA (State Emergency) 800-782-7860 OEA O'Shea Environmental 630-243-8364 National Response Center: (800) 424-8802 **Alarm Detection Services 630-844-6300** **ADT 630-941-2524**
Local Emergency Medical Facility	**Alexian Brothers Hospital** **800 Biesterfield Road** **Elk Grove, IL. 60007** **847-437-5500** **[Fax #]**
Material Safety Data Sheets	**Lab area & main office 1950 Pratt**

Spill Prevention:

Hazardous Substance Management: All hazardous substances, including chemical wastes, are managed in a way that prevents release. The following general requirements are followed. They include:

- *Container Management:*
  - All hazardous substance containers must be in good condition and compatible with the materials stored within.
  - All hazardous substance containers must be accessible and spacing between containers must provide sufficient access to perform periodic inspections and respond to releases.
  - Empty hazardous substance containers (drums) must have all markers and labels removed and the container marked with the word 'empty'.
  - Any spills on the exterior of the container must be cleaned immediately.
  - Flammable materials stored or dispensed from drums or totes must be grounded to prevent static spark.
  - Do not overfill waste drums. 4"of headspace must remain to allow for expansion

- *Good Housekeeping:*
  - All hazardous substances must be stored inside buildings or under cover;
  - Store hazardous substances not used daily in cabinets, or in designated areas;
  - All chemicals that are transferred from larger to smaller containers must be transferred by use of a funnel or spigot.
  - All hazardous substance containers should be closed while not in use;
  - Use drip pans or other collection devices to contain drips or leaks from dispensing containers or equipment;
  - Preventative maintenance activities are implemented to reduce the potential for release from equipment;
  - Immediately clean up and properly manage all small spills or leaks;
  - Periodically inspect equipment and hazardous substance storage areas to ensure leaks or spills are not occurring;
  - Signage is used to identify hazardous substance storage or waste collection areas;
  - Keep all work areas and hazardous substance storage areas clean and in good general condition.

- *Secondary containment:*
  - Store all bulk chemicals ($\geq$55 gallons) within appropriate secondary containment, or any sized chemical if there is a potential for release to the environment.
  - Secondary containment should be checked periodically, and any spills identified in secondary containment must be immediately cleaned up and removed.

- *Marking/labeling:*
  - Ensure all hazardous substances, including chemical wastes, are properly marked and labeled in accordance with all federal, state and local regulations.
  - Ensure that hazardous substances transferred to small containers are marked with the chemicals name (example- "Isopropyl Alcohol") and hazard (example- "Flammable").

Employee Training: All employees receive periodic training on the proper handling of hazardous substances; spill prevention practices, and emergency response procedures. Training includes a review of the spill prevention and emergency response plan, and a review of location and use of emergency response equipment. Training is recorded through SSC Manager (Thomas E. Cozza), safety committee meetings, staff training logs, or other equivalent record keeping.

Hazardous Substance Inventory: An inventory is maintained for all hazardous substance stored in quantity (<55 gallons), and/or list of locations where non-bulk hazardous substances are stored (lab area, main office).

Spill Response Equipment: Spill response equipment is maintained and located in areas where spills are likely to occur. Spill kits are available for adequate response capabilities to manage any anticipated spill or release. The following general requirements are to be followed: They include:

- Stock spill clean up kits that are compatible with the hazardous substances stored on site;
- Spill kits are located in areas where spills are likely to occur (loading docks, chemical storage areas, locations where hazardous substance are being transferred);
- Spill kits are sized to manage an anticipated release (spill equal to the largest container);
- Emergency response equipment is inspected periodically to ensure that the spill kit is complete.

Spill Response, First Aid Equipment and Fire Alarm Location(s):

Spill Response equipment stored at front entrance of storage containment, with posting of fire zones, and emergency numbers and contacts to the front entrance of the storage containment.

*{Haz Mat spill kit in 65 gallon high visibility over pack
Contents : 1-Hi-Viz 65 gallon container, 1 Spill response information, Manual. 5-3'' x 10' Pig Haz Mat absorbent socks, 8 – 3'' x 46'' P Haz Mat absorbent socks 5 – 17'' x 16'' Pig Haz Mat pillows , Tamper proof label , 40 – 15'' x 20'' Pig Haz Mat pads , 1 – 5'' Pig Haz Mat Dikes , 1 Emergency response guidebook , 10 – Ye disposal bags and ties.}

Emergency Response Plan:
The Emergency Response Plan is a facility specific plan for dealing with emergencies and is implemented immediately whenever there is a fire, explosion, or release of a hazardous substance that threatens human health or the environment. The emergency response plan is reviewed and immediately amended whenever:

- The plan fails in an emergency;
- The facility changes in its design, construction, operation, maintenance, or other circumstances in a way that increases the potential for fire, explosions, or release of a hazardous substance;
- The list of emergency contacts change; or
- The list of emergency equipment changes.

Response actions in the event of a spill or release:
In the event of a hazardous substance spill or release, immediately take the following measures to keep the spill from entering sewer or storm drains, spreading off-site, or affecting human health. In all cases caution and common sense must be maintained with the primary goal being to prevent and/or limit personal injury.

Stop, contain, and clean up the chemical spill if:

- The spilled chemical and its hazardous properties have been identified;
- The spill is small and easily contained;
- Responder is aware of the chemicals' hazardous properties.

If a spill or release cannot be controlled or injuries have occurred due to the release the following procedures are implemented:

- Summon help or alert others of the release;
- Evacuate immediate area, and provide care to the injured - Call 911;
- If potential fire or explosion hazards exist initiate evacuation procedures- Call 911;
- Respond defensively to any uncontrolled spills:
  - Use appropriate personal protective equipment when responding to any spill;
  - Attempt to shut off the source of the release (if safe to do so);
  - Eliminate sources of ignition (if safe to do so);
  - Protect drains by use of adsorbent, booms or drain covers (if safe to do so).
- Notify onsite emergency contact(s);
- Notify other trained staff and/or **[emergency response contractor]** to assist with the spill response and cleanup activities;
- Coordinate response activities with local emergency personnel (fire department);
- Be prepared to provide MSDS information to fire department, EMT, hospital or physician;
- Notify appropriate agency if a release has entered the environment. Refer to Notification and Reporting section for reporting thresholds.

Evacuation Procedures:
In the event of a hazardous substance release that has the potential for fire, explosion or other human health hazards the following procedures will be implemented:

- Facility staff will be notified of evacuation by one or more of the following method(s): **[Verbal, Intercom, Portable Radio, Alarm, Other]**.
- Notification to emergency services will be performed- Call 911.
- Facility staff will follow predetermined evacuation routes and assemble at designated areas. Evacuation maps are displayed throughout the facility.
- Individuals responsible for coordinating evacuations must confirm if the business has been completely evacuated.
- Facility staff is made familiar with evacuation procedures during new employee orientation, and annual trainings thereafter.
- Designated emergency response contacts will coordinate all activities with outside emergency personnel.

Spill Cleanup and Disposal:
In the event of a hazardous substance release spill cleanup materials are to be properly characterized to determine if it designates as a Dangerous Waste. The designated onsite emergency contact, with the assistance of **our waste disposal vendor** and other resources will determine the wastes status prior to disposal.

Reporting a Release:
If a hazardous substance spill has been released to soil, surface water, drains or air the following notifications (within 24-hours) must be performed:

- **Fire Department** (any release that poses an immediate threat to human health, property or the environment)
- **National Response Center** (release of oil or fuel to surface water, or a release of a chemical with an established Reportable Quantity-RQ)

When reporting a release prepare to provide the following information:

- Your name and telephone number from where you are calling;
- Exact address of the release or threatened release;
- Date, time, cause and type of incident (fire, air release, spill, etc.)
- Material and quantity of the release, to the extent known;
- Current condition of the facility;
- Extent of injuries, if any; and
- Possible hazards to the public health and/or environment outside of the facility.