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Return Receipt Fee (Endorsement Required)	
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Postmark Here

Sent To: Jim Hilgarte
Street, Apt. No.; or PO Box No.: P.O Box 467 800 West Front St
City, State, ZIP+4: Chester, Pa 19013

PS Form 3800, June 2002 See Reverse for Instructions

Martin

shipment listed below.

2 0

Delivered On: 11/11/2013 10:25 A.M.
Delivered To: 950 10TH ST
MIDLAND, PA, US 15059

Signed By: JAMES

Location: OFFICE

Thank you for giving us this opportunity to serve you.

Sincerely,
UPS

Tracking results provided by UPS: 11/13/2013 10:58 A.M. ET

Martin

Delivery Notification

Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

Tracking Number:	1Z A43 F71 01 9540 992 0
Service:	NEXT DAY AIR
Weight:	1.00 Lb
Shipped/Billed On:	11/08/2013
Delivered On:	11/11/2013 10:25 A.M.
Delivered To:	950 10TH ST MIDLAND, PA, US 15059
Signed By:	JAMES

Location: OFFICE

Thank you for giving us this opportunity to serve you.

Sincerely,
UPS

Tracking results provided by UPS: 11/13/2013 10:58 A.M. ET

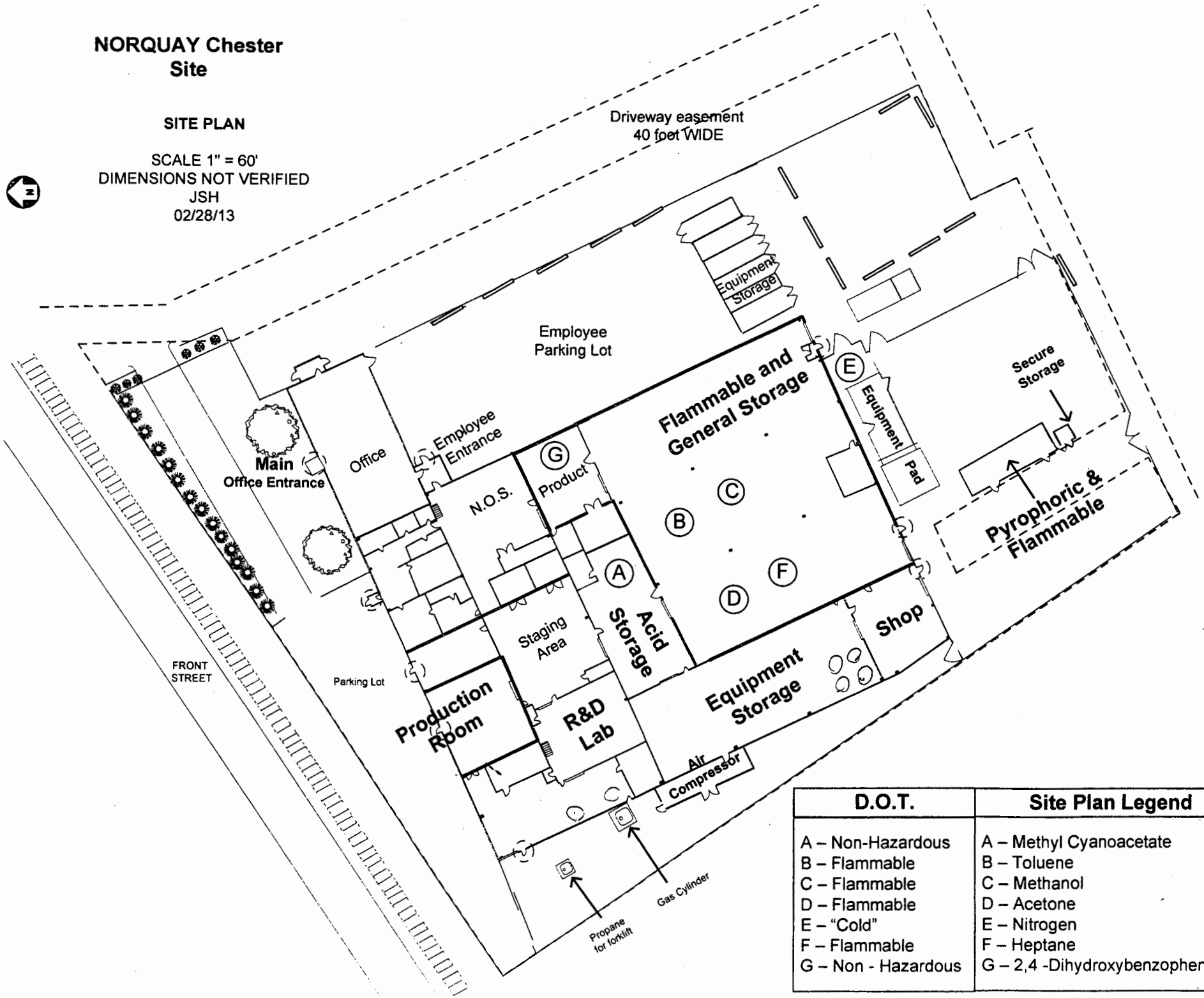
NORQUAY TECHNOLOGY PAD 982363889
CEI 7/30/13 Chester, PA

7530-00-274-5494
FEDERAL SUPPLY SERVICE
(GPO)

NORQUAY Chester Site

SITE PLAN

SCALE 1" = 60'
DIMENSIONS NOT VERIFIED
JSH
02/28/13



D.O.T.	Site Plan Legend
A – Non-Hazardous	A – Methyl Cyanoacetate
B – Flammable	B – Toluene
C – Flammable	C – Methanol
D – Flammable	D – Acetone
E – "Cold"	E – Nitrogen
F – Flammable	F – Heptane
G – Non - Hazardous	G – 2,4 -Dihydroxybenzophenone

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- Compliance
- Process Design
- Engineering
- Design/Build

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Norqvay 8:55 am

creds to recept. + JH

Jim Hogate, Project Eng. ~2.5yrs

Eric Logan, Prod^n Mgr ~2.5yrs

Est. 1987, no other branches

~23 employees 5 days 7am Mon – 7^30 pm Sat
3 shifts, 24hrs

Private, owned by Robert Heldt

report as LQG

SIC –

NAICS – 325199

Specialty Chem. manuf.

make:
- catalysts for plastics + additives
- starting material for medic. adhesives
- UV stabilizers
- photo reactives

raw materials
- solvents – acetone, toluene, hexane, heptane, methanol, etc.
- 100's of various chems

batch process
add ingred. to water, mix to solvent, maybe switch solvents, apply temp.

- mostly source own materials, some customers supply them

~½ liquid / ½ solid product

2 spots:

HW area - from reactors to drums, goes to warehouse
~88 x 55g drums/mo.

process waste H_2O - ~~into tanks~~ pH equal. then to storage tanks then shipped off as residual waste to H_2O Rt fac (various - ERC, & place in NJ)

~6,000 gal/wk

have Air permit for production area & Dryer Room + one continuous process

90 day - in warehouse

satellite - outside Reactor Rm in Utility Area
- trash can for gloves in Reactor Rm

Produxn Rm - 10 reactors

R+D Lab

Dryer Area - 2 rms, 3 dryers

Used oil - from vac pumps - to drum, takes a long time to fill

no USTs

Aer. cans - spray adhesives for labeling

lamps - box in warehouse

e-waste - someone came to recycle monitors
some old towers in storage, can't dispose due to security

TOUR 1:30

- Prod. office
- QC Lab.

- Staging Area
  - 2 dryer rooms
    - btwn products are cleaned
      - usu. just wipe w/rags (HW) + IPA, acetone

in left dryer Rm.
* 1 2
- 1 open container of gloves + towels
  Double Cone Dryer

in Rt dryer rm. — Tray Dryer
+ FKM dryer
↳ don't usu. clean

↳ Individ. trays are removed + washed in Prod. Rm.
— non-HW

both lab "solvents for cleaning"
7/29/13 & flam - couldn't take photo

2x55 gallon drums here
which ~~were~~ contain solvents for cleaning
may be used again

Prod Rm

- has trenches that have to be manually pumped

* 3,4 - 1 drum w/ offset lid lab as HW
"solid" 7-17-13
5 — inside

↳ gloves, clean-up, spills - may have used gloves in Dryer Rm.
when filled, goes to waste drum in WH

Reactors

if distilling, waste into one drum, product into another
- may come off top or bottom depending

- also have filter, dryer
centrifuge

generate 2-8 drums/batch
or ½ (like it cleaning)
at end of shift, would transfer to WH

⑥ overall, centrifuge at ⑥
- white & blue drums are collecting WW

Normally, fill one drum at a time w/HW
+ goes directly to WH when full

R+D Lab

- for new + current products

HW is taken out the door to "Sat." site

78 - 1 x 5gal container lab HW in "mixed solvent waste" dated 2/20/12
spill tray
felt ~ ½ full

when full, goes to outside area

- Glove Box Rm - closed room here to handle sensit. chem.s - no HW

Utility Rm

WW

pumped from trenches to pH neutr. tank,
to blue holding tank then to
large storage tanks in Equip. Storage Rm.

HW collection area in UR

9 - 4x 55g drums on spill pallet
all lab HW

3 lab "mixed solvent waste"
D001, F003, F005

1 lab "solid" D1, F3, F5
7/30/13

10 - front left
11 - front R
12 - back L - no date } not sure when
13 - back R - no date } gener.

- all felt fairly full

gen. from Reaxn Rm + Lab
when full, move to WH

Acid Storage Rm

- contains many drums & totes
  - raw mats

- have inventory 1/yr.
- for lab chems, chemists go thru on own

(14) - one tray w/ several bottles on it
  - CH said the chemists probably recently pulled these from the last shut down ~2 wks ago
  - PL says taken from labs ~2 mos ago, sched. for disp. as HW - none lab as HW or dated

Pete Litak, R&D Mgr - waited for him to see if I could take photos

15,16 - several cabinets filled w/ older chems
  G.C. - used in the labs mostly

~18 cdbd boxes lab as "Grace" + 6285
- inside were metal containers of phenol for a job

Equipment Rm

- have drum warmer for melting solids

(17) - contains 4 ASTs lab "residual waste"

3 x 5k gal
1 x 2,500 gal

& waste H2O from blue tank

(18) gets pumped thru ~~wall~~ bay door to tanker for disposal

Maint. Km

(19) - waste can of Uline Fast Tack Adhesive in open unlab. bucket

(20)

(21) - 1 can of house paint on shelf

Final Wlt

joined by Josephine Martin of IES - ~~subcontractor~~ does permitting/training

(22) 2 rows of HW drums in corner

40 x 55g on (L)

39 x 55g on (R)

23, 24 - 1 back (R) not dated

25 - 3 front (R) no lab/dates

26 - back (R) - 2 middle drums + 1 (R) couldn't see lab

lab on black one could be seen ~~but~~ + ~~not~~ read w/flashlight

27, 28 - 2 back left no date

29 - 1 back (L) unsure if month is 7 or 4

30 - 1 blk (L) no date

31 - "

32 - ~1 mid (L) no date

33 - 1 " "

34, 35 - 2 front (L) no date

36 - ~3 mid (L) couldn't see lab

4x ~20 gal drums label "malononitrile" "MDN"
"poison" "do not inventory"
- waiting for customer to decide if should be shipped back for use or disposal
- unsure of when arrived
one labeled "physical count" date: March 31, 2011
- looked old

37-38, 39 several containers, some corroded/broken
Eric - old, raw mats

40 - several containers bk (L) lab
as poisonous solids U.N. 2811

Eric - thinks old raw mats chemists
are determining

41/42 - open cont. in middle w/05 date

43-45 - open cont. w/bag w/09 invent.
date

46 - cont. in fr has acr. can of
Color works "Maintenance Choice" paint

47 - 4 x 55g back (L)
front (R) no lab

48. 1 x 55g drum at HW in
Quarantine Area, which usu. holds
raw materials but had this one
HW overflow
"mixed solvent waste" DI F3 F5
6/26/13

49 - UV lamp storage

- 1 box lab UV lamps
  acc. start date 11/6/12

- 3 boxes at (L) w/used lamps, not lab
  all open

50 - 3 loose lamps at (R)

51 - 2 more boxes below w/ lamps
  coming out

QC Lab

- 2 HPLC machines
  - 2 - bottles of H_2O/methanol collecting closed/lab
  - 52,53 - goes to 4L bottle under hood lab "methanol waste from HPLC" w/open funnel goes to waste drum in 90day area
  - bottles are transferred at end of day
- also have small process samples, some of which go to HW or Aq. waste
- use detergent for cleaning glass

ERP describes "Delaware County Emergency Operations Plan" which would describe coord., but has not been finalized by Planning Comm. for yrs

Docs 12:35

CP - dated 10/12
PPC Plan by IES Engineers
- says designed for NPDES regs
signed by RH 11/13/12

actions
- fires - ERP
- explosions - ERP
- releases ✓

- local auth. arrgmts ~~✓ desc~~ says must be done, no specifics
"Facility Contacts" pg 8
ECs - 1° - JH, "Alternate #1" - EL, Alt #2 - Robert Heldt, Pres.
also have "Emergency Response Team" just JH + EL pg 10
- name ✓
- addr. X
- phone ✓

AH 3 - "List of" ECs JH, EL + RH

- emerg. equip ✓
  - list ✓
  - location ✓
  - descr. ✓

- evac plan - in separate Emergency Response Plan

- copies shared

- says no spills last 3 yrs

"Emergency Response Plan"
"Updated" 12/12

-asked for copies of PPC/ERP

TSDs

① Clean Harbors ARD069748192
El Dorado, AR

② CH TXD055141378
La Porte, TX

③ Ecoflo NCD980842132
Greensboro, NC

④ Spring Grove Resource Recovery
Cinc., OH OHD000816629

⑤ Clean Harbors
Hebron, OH OHD980587364

	TSD	contents			TSP sign?	LDR?
9/18/12 008542259 JJK	3	80 Dm flam liq (acetone, xylene) 2 Dm HW solid (xylene, toluene) 8 Dm Flam liq (toluene, HCL)	32,000# 600# 3200#	D1, F3, F5 F3, F5 D1, D2, F3, F5	Y	N → OK
8/21/12 005649876 FLE	4	88 Dm Flam liq	35,200#	D1, F3, F5	Y	N → OK
7/25/12 008542969	3			D1, F3, F5	Y	N → OK
5/21/12 005239573	5	88 Dm flam liq	35,200#	D1, F3, F5	N	N → Y
5/21/12 005239572	1	2 Dm HW solid (tol., acet)	400#	F3, F5	N	
3/23/12 008533486	3	84 Dm wfl	33,600#	D1, F3, F5	N	
3/8/12 005239346	5	84 Dm	34,500#	D1, F3, F5	N	

several more found w/out TSD sign.

only had 2012-13 avail.

Training

- covers HW, conducted by IES personnel
new people get Hazcom, safety

1/24/13 - miss Lynn Baumann, Markese Clay, RH

3/22/12 - miss Markese, RH

4/5/11 - miss Markese, ~~Sean~~ not here then

RH ~~not seen on any~~ on 4/5/11

require HW training for all operators:

Bob Miller, George ~~Davis~~ Dennis III, Konjo Fetegula, Kerie Davis, Mike Allen, Lynn Baumann, Jon Holland, Dwayne Jones, Markese Clay, Sean Pinkett, George Dennis IV

no seperate list

Insp. logs

From 7/26/13 - 2011

looks at HW containers - open, condition, labeling, date, HW lab, area

containment pallet

spill equip.

insp. Warehouse, Reactor Rm, "Satellite" area by Sean Pinkett

gaps:

2013

6/21/13 - 6/7/13

4/19/13 - 3/22/13

1/25/13 - 1/4/13

think the inspexns were done, just not doc.

2012

start 5/17/12

6/29/12 - 7/20/12

7/20/12 - ~~8/17/12~~ 8/3/12

10/17/12 - 11/2/12

11/2/12 - 11/16/12

11/16/12 - 12/21/12

Waste Profiles

- Clean Harbors Profile CH209133
  "mixed solvent waste"
  says HW, D1, F3, F5
  not coded

- CH Profile # CH419477
  "PPE from Process operations"
  HW F3, F5

reviewed each yr.

might have one for the HW

For WW, require non-flam, pH 5-9,
TSS ≤5%, no chlorinated compounds
~~toxicity~~ halides <10 ppm, but no current analysis

hauled by
~~goes~~ to U.S. Environment

to ERC

Biennial Reports

have 2011 + 2009

2009 - sent w/ltr dated 2/25/10
from Joseph Rambo of IES

LQG

2011 - w/ltr 2/24/12
from Ryan Haas of IES

LQG

- seems to be missing the GM
forms describing wastes

- found later

WW manifests

from 7/26/13 - 1/10/13

~6000g / wk

- CH Profile # CH4441478

"Non Haz Wastewater"
says not HW

Closing

Me
JHoran
J Hogate
Eric
JM