

3.05-1/20/94-00367

**WASTE TRANSPORTATION
AND DISPOSAL PLAN**

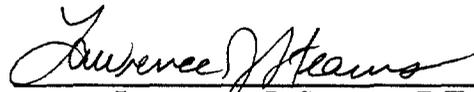
**BUILDING 121 REMEDIATION
U.S. NAVAL STATION ROOSEVELT ROADS
PUERTO RICO**

Prepared for:

Department of the Navy Atlantic Division
Naval Facilities Engineering Command
Norfolk, Virginia
LANTDIV RAC Contract No. N62470-93-D-3032

Prepared by:

OHM Remediation Services Corp.
1000 RIDC Plaza - Suite 600
Pittsburgh, Pennsylvania 15238-2928
(800) 284-6462



Lawrence J. Stearns, P.E.
Project Manager - Delivery Order No. 004

20 January 1994
OHM Project No. 15591

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1.0 PURPOSE AND WORK DESCRIPTION

1.1 PURPOSE

OHM Remediation Services Corp. (OHM), a subsidiary of OHM Corporation, is contracted by the U.S. Department of the Navy (LANTDIV) to provide remediation of Building 121 at the U.S. Naval Station, Roosevelt Roads, Cieba, Puerto Rico.

The purpose of this Transportation and Disposal Plan (TDP) is to present the procedures, organization, and responsibilities for storage, record keeping, transport, and disposal of hazardous and non-hazardous solid or liquid wastes. This TDP is prepared in accordance with the requirements of NAVFAC Specification No. 05-93-3199 (as amended), Section 02225 - Part 3.1.4.

1.2 WORK DESCRIPTION

The scope of work for the remediation of Building 121 generally includes: preparation of various pre-construction, construction, and post-construction plans and submittals; attendance and participation at pre-construction and various other meetings; mobilization and demobilization; site preparation; cleaning the interior surfaces of Building 121; various sampling and analyses for air, soil, water, and concrete media; removing a portion of the concrete from the surface of the building floor; excavating contaminated soil outside the building; transportation and disposal of generated hazardous and non-hazardous wastes; erosion and sediment control; health and safety control; quality control; site restoration; and incidental work. Further discussion of the work and its implementation can be found in the OHM Work Plan.

2.0 ORGANIZATION AND RESPONSIBILITIES

2.1 ORGANIZATION

The project is organized as shown in Figure 1.

2.2 RESPONSIBILITIES

The responsibilities of the program manager, project manager, project superintendent, QC manager, certified industrial hygienist, and site health and safety officer are as provided in the Basic Contract: Section C, Part 1.3.

The implementation of this TDP is the responsibility of the project superintendent. The project superintendent is responsible for the day-to-day activities which include removal, collection, temporary storage, and coordination of subcontractor parties involved with transport and disposal of wastes. He communicates directly with the project manager regarding project progress and QC related items.

OHM will utilize select subcontractors to provide various waste transportation and disposal services required to perform the project work. OHM is ultimately responsible for the performance and actions of these subcontractors and therefore will retain complete control over their actions regarding project related work.

3.0 HAZARDOUS WASTES

3.1 GENERAL

The following section describes the procedures for on-site storage, transportation, and disposal, and the role of subcontractors. Hazardous wastes which may be present or generated during this remediation project include the following:

- Soils excavated from east of Building 121
- Cleaning waters from building decontamination
- Concrete scabble from the building floor
- Equipment decontamination wash or rinse waters
- Decontamination pad materials
- Used, disposable sampling or other contaminated tools and equipment
- Expended personnel protection equipment (PPE)
- Personnel decontamination station wash/rinse waters.

The results of various sampling and analyses events will indicate appropriate disposal practices for a given waste. Refer to the Field Sampling and Analysis Plan (FSAP) for details concerning methods and practices for sampling and analyses.

3.2 IDENTIFICATION

In general, the following liquid and solid wastes will automatically be identified as hazardous wastes unless the potential source of contamination is analytically shown to be non-hazardous and the Contracting Officer Technical Representative (COTR) or Navy Technical Representative (NTR) approves their disposal as non-hazardous liquid wastes (Section 4.0) or non-hazardous solid wastes (Section 5.0):

- Concrete scabbled from the floor of the building
- Soils excavated from east of Building 121
- Used, disposable sampling, or other contaminated, tools and equipment
- Expended personnel protection equipment (PPE)
- Equipment decontamination pad wash/rinse waters
- Personnel decontamination station wash/rinse waters.

The initial cleaning waters (wash and rinse) from the decontamination of the building interior will be disposed of as hazardous wastes at the direction of the COTR or NTR. Otherwise, the initial cleaning waters will be disposed of as non-hazardous liquid wastes (Section 4.0).

The three high-pressure wash and rinse waters from the decontamination of the building interior will be disposed of as hazardous wastes if any of the parameters tested exceed the action levels given in Table 1 of the FSAP. Otherwise, the three high-pressure wash and rinse waters will be disposed of as non-hazardous liquid wastes (Section 4.0).

The equipment decontamination pad wash/rinse waters and personnel decontamination station wash/rinse waters will be disposed of as hazardous wastes if any of the parameters tested exceed the action levels given in Table 1 of the FSAP. Otherwise, the decontamination liquids will be disposed of as non-hazardous liquid wastes (Section 4.0). Wash waters and rinse waters from both the pad and station will be collected together. Final rinse waters from both the pad and station will be collected together, but will be segregated from the other decontamination wash/rinse water liquids.

3.3 ON-SITE STORAGE

OHM will temporarily store all hazardous wastes in on-site intermodal containers designed to contain such materials without spillage. These containers will be provided for OHM's use provided by OHM's transportation and disposal (T&D) subcontractor. Hazardous wastes can not be stored on-site for more than 90-days from the date of generation. The storage containers will be properly labeled including the date of generation.

All storage containers will be covered and any damage or contamination caused by storage will be repaired or cleaned up to the satisfaction of the COTR and NTR. All disposable sampling equipment, contaminated tools, spent PPE, and similar materials will be placed in plastic garbage bags prior to disposal. Storage containers will be staged on-site at a location approved by the COTR or NTR.

3.4 TRANSPORTATION AND DISPOSAL

OHM will comply with all federal and local requirements for transporting hazardous materials. At a minimum, OHM's T&D subcontractors will comply with the requirements of 49 CFR ~~100-199~~ and in addition will be responsible for the following:

and 40 CFR 260-268

- Inspection and documentation of all vehicles and containers for proper operation and covering
- Inspection of all vehicles and containers for proper markings, manifest documents, and other requirements for waste shipment
- Performance and documentation of decontamination procedures, if necessary, prior to leaving the project site.

OHM will have the following submittals approved prior to soil excavation or waste transportation of any waste to an approved disposal facility:

- SD-08 Disposal Site Certification: Section 02223 - Part 1.2.1(a)
- SD-08 Decontamination Certification: Section 02223 - Part 1.2.1(f).

Disposal of hazardous wastes will be performed by OHM's T&D subcontractor who will have the appropriate permits and licenses. The following submittals will be submitted by OHM at the times required:

- SD-08 Manifests: Section 02223 - Part 1.2.1(b)
- SD-08 Verification of Waste Delivery: Section 02223 - Part (c)
- SD-08 Verification of Waste Disposal: Section 02223 -Part (d).
- SD-08 Decontamination After Disposal: Section 02223 -Part (e).

Clean Harbors Environmental Services, Inc., will provide and arrange for the transport and dispose of project hazardous wastes. Their address and telephone number is:

Clean Harbors of Kingston, Inc.
Puerto Rico Service Center
P.O. Box 1361
522 Calle Sur
Dorado, Puerto Rico 00646
(800) 796-5630
Point of Contact: Stephanie Kuzemchak

Refer to Figure 2 for a flow chart of hazardous waste transportation and disposal. The hazardous waste containers will be transported by truck from the project site to the port of San Juan by Juan E. Hernandez, Inc. (EPA ID No. PRD-090220732/Phone: 809-881-1266). From the Port of San Juan, Puerto Rico Marine Management, Inc. (EPA ID No. PRD-000726810/Phone: 809-793-3000) will transport the containers by ship or barge to the Port of Baltimore. At the Port of Baltimore, Clean Harbors Environmental Services Inc. (EPA ID No. MAD-039322250) will transport the containers by truck to a RCRA-TSD facility - Clean Harbors of Baltimore, Inc. (EPA ID No. MDD-980555189/Phone: 410-244-8200).

From this TSD facility, Clean Harbors Environmental Services, Inc., will transport the containers to various RCRA hazardous waste TSD facilities for final treatment or disposal. Concrete and liquid wastes will be incinerated at either Rollins Environmental Services, Inc., of Baton Rouge, Louisiana (EPA ID No. LAD-010395127) or to ENSCO of El Dorado, Arkansas (EPA ID No. ARD-69748192). The contaminated soil and related materials will be transported by truck for landfill disposal at the Chemical Waste Management, Inc., facility in Model City, New York (NYD-049836679/Phone: 614-898-0440).

4.0 NON-HAZARDOUS LIQUID WASTES

4.1 GENERAL

The following section describes the procedures for on-site storage, transportation, and disposal of non-hazardous liquid wastes, and the role of the subcontractors. Non-hazardous, liquid wastes from this project may include the following:

- Initial cleaning waters from decontamination of building interior
- Rinse and wash waters from equipment decontamination
- Wash and rinse waters from high-pressure decontamination of building interior.

The results of various sampling and analyses events will indicate appropriate disposal practices for a given liquid waste. Refer to the FSAP for details concerning methods and practices for sampling and analyses.

The initial cleaning waters (wash and rinse) from the decontamination of the building interior will be disposed of as hazardous wastes (Section 3.0) at the direction of the COTR or NTR. Otherwise, the initial cleaning waters will be disposed of as non-hazardous liquid wastes.

The three high-pressure wash and rinse waters from the decontamination of the building interior will be disposed of as hazardous wastes (Section 3.0) if any of the parameters tested exceed the action levels given in Table 1 of the FSAP. Otherwise, the three high-pressure wash and rinse waters will be disposed of as non-hazardous liquid wastes.

The equipment decontamination pad wash/rinse waters and personnel decontamination station wash/rinse waters will be disposed of as hazardous wastes (Section 3.0) if any of the parameters tested exceed the action levels given in Table 1 of the FSAP. Otherwise, the decontamination liquids will be disposed of as non-hazardous liquid wastes (Section 4.0). Wash waters and rinse waters from both the pad and station will be collected together. Final rinse waters from both the pad and station will be collected together but segregated from the other decontamination wash/rinse water liquids.

4.2 ON-SITE STORAGE

OHM will temporarily store all non-hazardous liquid wastes on-site in new DOT 17E drums. All drums will be covered with polyethylene sheeting while not in direct use, and any damaged or leaking drums will immediately be unloaded into new drums or overpacked. Non-hazardous liquid wastes will initially be treated as hazardous wastes

until analytical testing results become available and are submitted to the COTR or NTR for review and directions regarding disposal. With the approval of the COTR or NTR, the non-hazardous liquid wastes may be combined for storage in approximately 300-gallon polyethylene tanks or other approved storage containers.

4.3 TRANSPORTATION AND DISPOSAL

OHM will transport the non-hazardous liquid wastes to the Forrestal Wastewater Treatment Plant (located on the U.S. Naval Station Roosevelt Roads) for disposal. Prior to transportation, OHM will contact the Public Works Department for approval and instructions regarding delivery procedures. Transportation will be by truck carrying drums or other approved containers.

5.0 NON-HAZARDOUS SOLID WASTES

5.1 GENERAL

The following section describes the procedures for on-site storage, transportation, and disposal of non-hazardous solid wastes, and the role of the subcontractors. Non-hazardous, solid wastes from this project may include the following:

- Certain decontamination pad materials
- Used silt fence
- Certain sampling equipment, tools, or other uncontaminated materials
- Daily rubbish, lunch trash, paper, and debris.

5.2 ON-SITE STORAGE

OHM will temporarily store all non-hazardous solid wastes on-site in metal or rigid plastic containers with lids designed to contain such materials without spillage. These may be standard roll-off boxes, garbage cans, or dumpsters as appropriate.

5.3 TRANSPORTATION AND DISPOSAL

OHM will subcontract T&D services for non-hazardous solid wastes to a local firm currently providing this same service on the naval station.

5.4 SOLID WASTE SUBCONTRACTOR

The subcontractor retained by OHM to transport and dispose of non-hazardous solid waste to an approved disposal facility is A & A Waste Management, Inc.. Their address and telephone number is:

A & A Waste Management, Inc.
Castillo Del Mar 31355
Esla Verda, Puerto Rico 00923
(809) 865-0010

PLOT SCALE: 1" = 1"

OHM CORPORATION PITTSBURGH, PA	DRAWN BY <i>B.O'Connor</i> 1-17-94	CHECKED BY	APPROVED BY	DRAWING NUMBER 15591-A1
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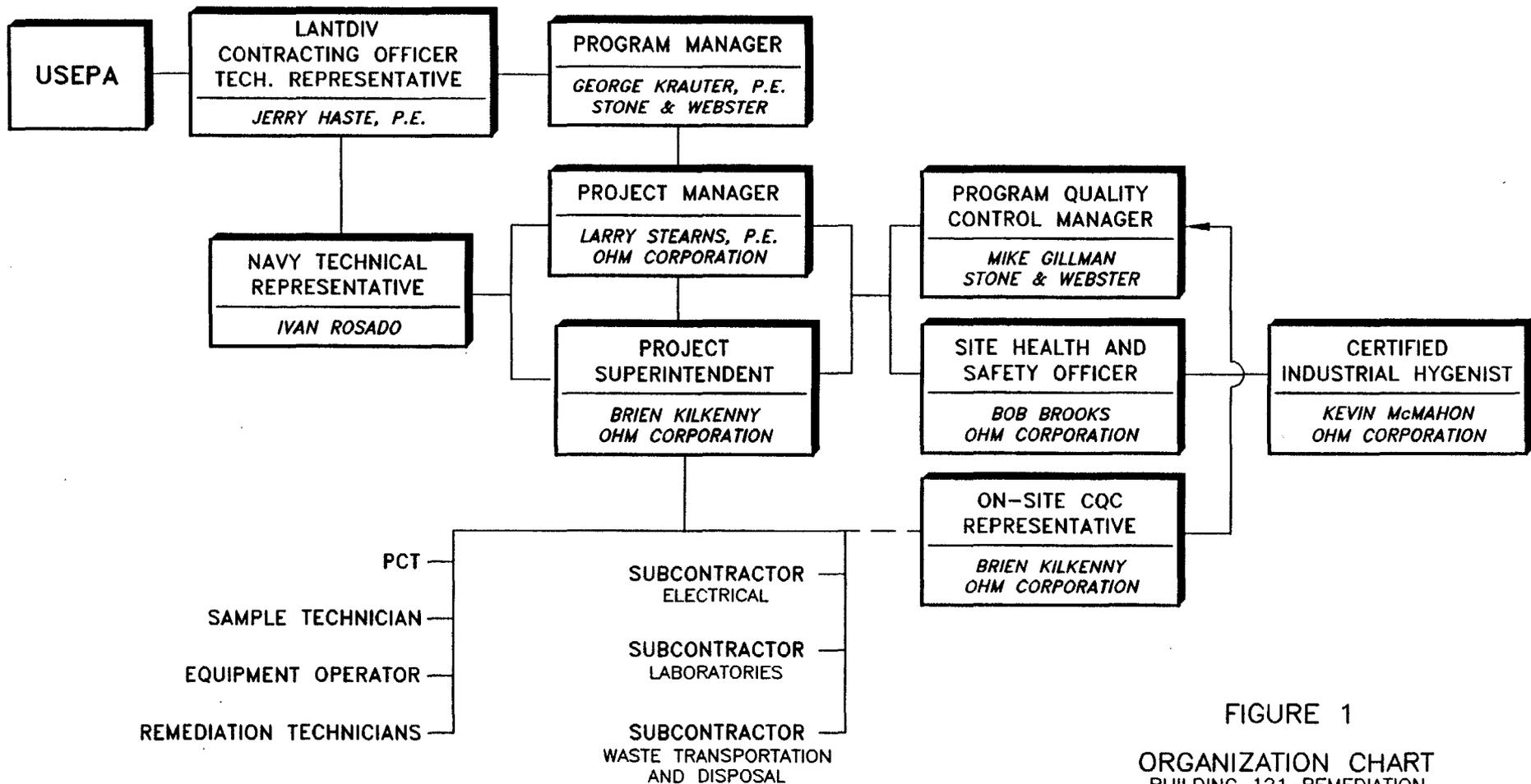
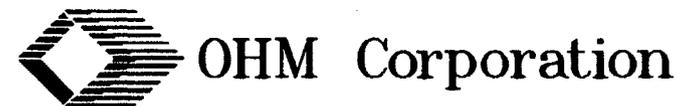


FIGURE 1

ORGANIZATION CHART
BUILDING 121 REMEDIATION
U.S. NAVAL STATION - ROOSEVELT ROADS

PREPARED FOR

DEPARTMENT OF THE NAVY
ATLANTIC DIVISION - NAVFAC
NORFOLK, VIRGINIA



DRAWING NUMBER 15591-A14

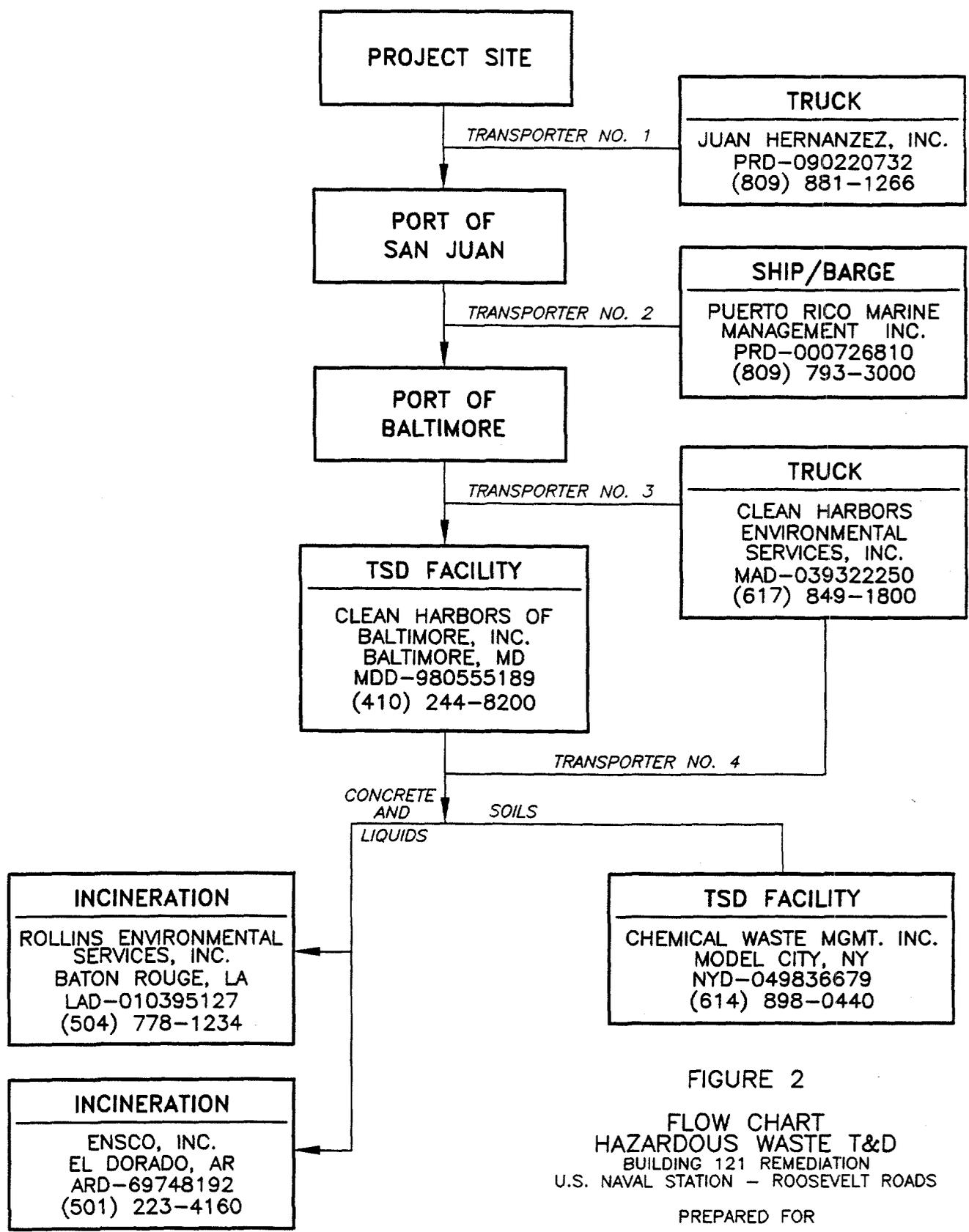
APPROVED BY

CHECKED BY

DRAWN BY B.O'Connor 1-21-94

OHM CORPORATION PITTSBURGH, PA

PLOT SCALE: 1" = 1"



TRUCK
 JUAN HERNANDEZ, INC.
 PRD-090220732
 (809) 881-1266

SHIP/BARGE
 PUERTO RICO MARINE
 MANAGEMENT INC.
 PRD-000726810
 (809) 793-3000

TRUCK
 CLEAN HARBORS
 ENVIRONMENTAL
 SERVICES, INC.
 MAD-039322250
 (617) 849-1800

TSD FACILITY
 CHEMICAL WASTE MGMT. INC.
 MODEL CITY, NY
 NYD-049836679
 (614) 898-0440

INCINERATION
 ROLLINS ENVIRONMENTAL
 SERVICES, INC.
 BATON ROUGE, LA
 LAD-010395127
 (504) 778-1234

INCINERATION
 ENSCO, INC.
 EL DORADO, AR
 ARD-69748192
 (501) 223-4160

FIGURE 2
 FLOW CHART
 HAZARDOUS WASTE T&D
 BUILDING 121 REMEDIATION
 U.S. NAVAL STATION - ROOSEVELT ROADS

PREPARED FOR
 DEPARTMENT OF THE NAVY
 ATLANTIC DIVISION - NAVFAC
 NORFOLK, VIRGINIA

APPENDIX A

**CERTIFICATIONS OF HAZARDOUS WASTE
TRANSPORTERS AND DISPOSAL FACILITIES**

WASTE MANAGEMENT ADMINISTRATION

CONTROLLED HAZARDOUS SUBSTANCES HAULER CERTIFICATE

HWH 160

HAULER CERTIFICATION NUMBER

Pursuant to the authority of the Environment Article §§7-249 through §§7-252, Annotated Code of Maryland.

Clean Harbors Environmental Services, Inc.
1200 Crown Colony Drive
Quincy MA 02269

is hereby authorized to transport Controlled Hazardous Substances in accordance with requirements and conditions of the Environment Article §§7-252, Annotated Code of Maryland, and the Code of Maryland Regulations, Title 26, Sub-Title 13, in the certified vehicles listed below and subject to the following conditions:

- (1) Secure a bond of not less than \$50,000 according to the provisions of the regulations COMAR 26.13.04.04, for the purpose of indemnifying the State for abatement of pollution resulting from the improper transportation or spill of CHS;
- (2) Provide a copy of the manifest supplied by the waste generator to the operator of the facility;
- (3) Demonstrate and comply with the Department of Transportation regulations for vehicles and container, COMAR 11.16 and 49 CFR Part 173, 177, 178, 179, 296, 387, 393, and 396;
- (4) Allow the Director of the Waste Management Administration and his authorized representatives upon the presentation of credentials to enter and inspect vehicles, contents of containers, and all records relating to the transportation of CHS;
- (5) Transport CHS from a source within the State or to a facility in the State only in certified vehicles driven by a certified driver;
- (6) Report periodically, on a form prescribed by the Department, the source, disposal destination, volume, and nature of the CHS transported;
- (7) Pay a fee for certification of \$50.00 per vehicle used for hauling of CHS; and
- (8) Transport bulk liquid, ignitable, and/or ORM (hazard class(es)) Controlled Hazardous Substances in DOT specification MC 300-312 tanks or containers.

VEHICLE(S)

VEHICLE CERTIFICATION NUMBER(S): 94 A 2030, 94 A 2031, 94 A 2032, 94 A 2033, 94 A 2034, 94 A 2035, 94 A 2036, 94 A 2037, 94 A 2038, 94 A 2039, 94 A 2040, 94 A 2041, 94 A 2042, 94 A 2043, 94 A 2044, 94 A 2045, 94 A 2046, 94 A 2047, 94 A 2048, 94 A 2049, 94 A 2050, 94 A 2051, 94 A 2052, 94 A 2053, 94 A 2054, 94 A 2055, 94 A 2056, 94 A 2057, 94 A 2058, 94 A 2059, 94 A 2060, 94 A 2061, 94 A 2062, 94 A 2063, 94 A 2064, 94 A 2065, 94 A 2066, 94 A 2067, 94 A 2068, 94 A 2069, 94 A 2070, 94 A 2071, 94 A 2072, 94 A 2073, 94 A 2074, 94 A 2075, 94 A 2076, 94 A 2077, 94 A 2078, 94 A 2079, 94 A 2080, 94 A 2081, 94 A 2082, 94 A 2083, 94 A 2084, 94 A 2085, 94 A 2086, 94 A 2087, 94 A 2088, 94 A 2089, 94 A 2090, 94 A 2091, 94 A 2092, 94 A 2093, 94 A 2094, 94 A 2095, 94 A 2096, 94 A 2097, 94 A 2098, 94 A 2099, 94 A 2100, 94 A 2101, 94 A 2102, 94 A 2103,
CONTINUED ON NEXT PAGE

Issued this first day of January, 1994, for the Waste Management Administration.

Richard W. Collins, Director

Expiration Date December 31, 1994
MDE 123



JUNTA DE CALIDAD AMBIENTAL
OFICINA DEL GOBERNADOR
DIVISION DE DESPERDICIOS PELIGROSOS

LICENCIA PARA OPERAR SERVICIOS DE RECOLECCION
DE DESPERDICIOS SOLIDOS PELIGROSOS

Nombre del dueño: José L. Valentín, Gerente de Tráfico
Nombre de la compañía: Juan Hernández, Inc.
Dirección: P.O. Box 598, Arecibo, Puerto Rico 00613-0598
Teléfono: (809) 881-1266
Número de licencia: HW-12
Fecha de expiración: 31 de marzo de 1994

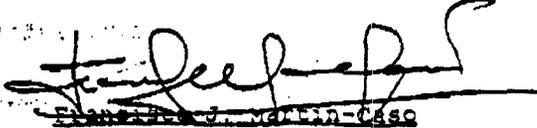
Por la presente se autoriza a Juan Hernández, Inc., para que pueda continuar operando el servicio de recolección de desperdicios sólidos peligrosos. La autorización está sujeta al cumplimiento de los Reglamentos vigentes del Área Control Contaminación de Terrenos, o los que en adelante se dictaren.

La Junta podrá suspender o revocar esta licencia si se comprueba que se ha incurrido en alguna violación de las reglas o reglamentos vigentes.


Hector Riusa Martínez
Presidente

18 de marzo de 1993
Fecha


Ferrnanda Román Pérez
Vice-Presidente


Francisco J. Martín-Caso
Miembro Asociado

FJL/sec



*
*
*AREA CONTROL CONTAMINACION DE TERRENOS
*
*

LICENCIA PARA OPERAR SERVICIOS DE RECOLECCION

Lic. Núm.: SR-93-0016

Fecha exp.: 19 de agosto de 1993

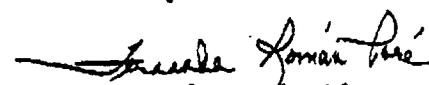
Vence en: 19 de agosto de 1996

Arecibo
Municipio

Por la presente se autoriza a: Juan E. Hernández, Inc., para que pueda continuar operando el servicio de recolección de desperdicios sólidos no peligrosos. La autorización está sujeta al cumplimiento de los Reglamentos vigentes del Area Control Contaminación de Terrenos, o los que en adelante se dictaren.

La Junta podrá suspender o revocar esta licencia si se comprueba que se ha incurrido en alguna violación de las Reglas o Reglamentos vigentes. El área de servicio comprende los puntos de recolección contemplados en el Plan de Operación.


Héctor M. Russe Martínez
Presidente


Fernanda Román Pérez
Vice Presidente


Francisco José Martín-Caso
Miembro Asociado

Tipo de servicio: Servicio de recolección de desperdicios sólidos no peligrosos

Dirección: Carr. 682, Km. 13.5, Bo. Cercadillo, Arecibo, PR

Dueño y/o administrador: Sr. Juan E. Hernández Alfonso

JAFO/esp

Redujo por la fuerza que hizo cosa en el ambiente que lo rodea.

DIRECCIÓN FÍSICA: EDIFICIO BANCO NACIONAL PLAZA / AVÉ. PONCE DE LEÓN 431 / HATO REY, PUERTO RICO 00917
APARTADO 11488 / SANTURCE, PUERTO RICO 00916 / TELEFONO 787-8161



ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

PR0000726810

RECEIVED
NOV 26 1980
INSTALLATION ADDRESS
PUERTO RICO MARINE MANAGEMENT, INC.
Administrative Services

PUERTO RICO MARINE MANAGEMENT INC
APO BOX 71304
SAN JUAN PR 00936

ZONA PORTUARIA PUERTO RICO
SAN JUAN PR 00936

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE TSD FACILITY

PERMITTEE: Rollins Environmental Services (LA) Inc. (RESLA)
PERMIT NUMBER: LAD 010395127-P
FACILITY: 13351 Scenic Highway (U.S. 61)
LOCATION: Post Office Box 74137
Baton Rouge, Louisiana 70807-4137

This permit is issued to the Permittee by the Louisiana Department of Environmental Quality (LDEQ) and the U. S. Environmental Protection Agency (EPA) under the authority of the Louisiana Hazardous Waste Control Law R.S. 30:2171 et seq., and the regulations adopted thereunder and by the EPA under the authority of the 1984 Hazardous and Solid Waste Amendments (HSWA) to Resource Conservation and Recovery Act (RCRA) to Rollins Environmental Services (LA), Inc. (hereafter called the permittee), to operate a hazardous waste treatment, storage, and disposal (TSD) facility located a Baton Rouge, Louisiana at latitude 30° 34' and longitude 90° 13'.

The permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein and the applicable regulations as specified in this permit. Applicable regulations are those which are in effect on the date of issuance of this permit.

This permit is based on the assumption that the information provided to LDEQ by the permittee is accurate. Further, this permit is based in part on the provisions of Sections 206, 212, and 224 of the HSWA of 1984, which modify Sections 3004 and 3005 of RCRA. In particular, Section 206 requires corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage or disposal facility seeking a permit, regardless of the time at which waste was placed in such unit. Section 212 provides authority to review and modify the permit at any time. Any inaccuracies found in the submitted information may be grounds for the termination, modification or revocation and reissuance of this permit (see LAC 33:V.323) and potential enforcement action. The permittee must inform the administrative authority of any deviation from or changes in the information in the application which would affect the permittee's ability to comply with the applicable regulations or permit conditions.

This permit is effective as of March 21, 1991, and shall remain in effect until March 21, 2001, unless revoked and reissued, modified or terminated in accordance with LAC 33:V.705.


Paul H. Templet, Ph.D., Secretary
Dept. of Environmental Quality

2/4/91
Date

State Pollutant Discharge Elimination System (SPDES)
DISCHARGE PERMIT
Special Conditions (Part 1)

Industrial Code 4952
Discharge Class (CL) 03
Toxic Class (TX) 04
Major D.B. 01
Sub D.B. 01

Facility ID Number: NY. NY-007-2061
UPA Tracking Number: 90-85-1174
Effective Date (EDP): January 1, 1987
Expiration Date (ExDP): January 1, 1992
Modification Date(s): _____
Attachment(s): General Conditions (Part II, 2/85)

This SPDES permit is issued in compliance with Title 8 of Article 17 of the Environmental Conservation Law of New York State and in compliance with the Clean Water Act, as amended, (33 U.S.C. §1251 et. seq.) (hereinafter referred to as "the Act").

Attn: Mr. Dean Nelson

Permittee Name: SCA Chemical Services, Inc.

Street: 1550 Balmer Road

City: Model City State: New York Zip Code: 14107

is authorized to discharge from the facility described below:

Facility Name: SCA Chemical Services, Inc.

Location (C.T.A.): Porter (T) County: Niagara

Mailing Address (Street): 1550 Balmer Road

Mailing Address (City) Model City State: New York Zip Code: 14107

from Outfall No. 001 at Latitude 43° 13' 06" & Longitude 79° 07' 56"

into receiving waters known as: Niagara River Class A-Special

and: (list other Outfalls, Receiving Waters & Water Classification)

In accordance with the effluent limitations, monitoring requirements and other conditions set forth in this permit.

This permit and the authorization to discharge shall expire on midnight of the expiration date shown above and the permittee shall not discharge after the expiration date unless this permit has been renewed, or extended pursuant to law. To be authorized to discharge beyond the expiration date, the permittee shall apply for permit renewal as prescribed by Sections 17-0803 and 17-0804 of the Environmental Conservation Law and Parts 621, 752, and 755 of the Departments' rules and regulations.

PERMIT ADMINISTRATOR (Alternate Regional)	DATE ISSUED	ADDRESS 600 Delaware Avenue Buffalo, New York 14202-1073 716/847-4663
Paul D. Eismann	11/26/86	

Distribution:


Paul D. Eismann

DEC PERMIT NUMBER
90-87-0476

FACILITY/PROGRAM NUMBER(s)
NYD049836679



PERMIT

Under the Environmental Conservation Law

EFFECTIVE DATE
July 31, 1989

EXPIRATION DATE(s)
July 31, 1994

- Article 15, Title 5: Protection of Water _____
 - Article 15, Title 15: Water Supply _____
 - Article 15, Title 15: Water Transport _____
 - Article 15, Title 15: Long Island Wells _____
 - Article 13, Title 27: Wild, Scenic and Recreational Rivers _____
 - 6NYCRR 608: Water Quality Certification _____
 - Article 17, Titles 7, 8: SPDES _____
 - Article 19: Air Pollution Control _____
 - Article 23, Title 27: Mined Land Reclamation _____
 - Article 24: Freshwater Wetlands _____
 - Article 25: Tidal Wetlands _____
 - Article 27, Title 7: Solid Waste Management _____
 - Article 27, Title 9: Hazardous Waste Management R & N
 - Article 34: Coastal Erosion Management _____
 - Article 36: Floodplain Management _____
 - Articles 1, 3, 37; 6NYCRR 380: Radiation Control _____
- N—New, R—Renewal, M—Modification
C—Construction, O—Operation, (If Applicable)

PERMIT ISSUED TO
CWM Chemical Services, Inc.

ADDRESS OF PERMITTEE
P.O. Box 200, Model City, New York 14107

AGENT FOR PERMITTEE/CONTACT PERSON
John Stanulonis, General Manager

TELEPHONE NUMBER
716/754-8231

NAME AND ADDRESS OF FACILITY (if different from Permittee)
Model City Facility, 1550 Balmer Road

LOCATION OF PROJECT 630 acre Model City Site	COUNTY Niagara	TOWN/CDS/CDSD Porter & Lewiston	UTM COORDINATES E1771.1/N4793.1
--	--------------------------	---	---

DESCRIPTION OF PROJECT/FACILITY
Continue operating the Drum Management Bldg., PCB Warehouse, Secure Trailer Parking Area, Transformer Decommissioning Bldg., Truckwash, Drum Crusher Area, Waste Stabilization Area, Aqueous Waste Treatment System, Fuels Tankage, Incinerables Tankage, and Secure Landfill 11. Operate the DECHLOR System on a permanently secured basis.

GENERAL CONDITIONS (See Also Module II)

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations and the conditions specified herein or attached hereto.

- The permittee shall file in the office of the appropriate regional permit administrator, or other office designated in the special conditions, a notice of intention to commence work at least 48 hours in advance of the time of commencement and shall also notify him/her promptly in writing of the completion of the work.
- The permitted work shall be subject to inspection by an authorized representative of the Department of Environmental Conservation which may order the work suspended if the public interest so requires.
- The permittee has accepted expressly, by the execution of the application, the full legal responsibility for all damages, direct or indirect, of whatever nature, and by whomsoever suffered, arising out of the project described herein and has agreed to indemnify and save harmless the State from suits, actions, damages and costs of every name and description resulting from the said project.
- The Department reserves the right to modify, suspend or revoke this permit at any time after due notice, and, if requested, hold a hearing where:
 - the scope of the project is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations are found; or
 - the permit was obtained by misrepresentation or failure to disclose relevant facts; or
 - newly discovered information of significant physical changes are discovered since the permit was issued.
- The permittee is responsible for keeping the permit active by submitting a renewal application, including any forms, fees or supplemental information which may be required by the Department, no later than 30 days (180 days for SPDES or Solid or Hazardous Waste Management permits) prior to the expiration date.
- This permit shall not be construed as conveying to the applicant any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work or as authorizing the impairment of any rights, title or interest in real or personal property held or vested in a person not a party to the permit.
- The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way which may be required for this project. Issuance of this permit by the Department does not, unless expressly provided for, modify, supersede or rescind an order on consent or determination by the Commissioner issued heretofore by the Department or any of the terms, conditions, or requirements contained in such order or determination.
- Any modification of this permit granted by the Department must be in writing and attached hereto.

PERMIT ISSUANCE DATE June 16, 1989	PERMIT ADMINISTRATOR (Deputy) Paul D. Eismann	ADDRESS NYSDEC - Region 9 600 Delaware Ave., Buffalo, NY 14202
AUTHORIZED SIGNATURE X <i>Paul D. Eismann</i>		Page 1 of 9 modules and attachments A-K



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

JACOB K. JAVITS FEDERAL BUILDING
NEW YORK, NEW YORK 10278

NOV 2 1990

John J. Stanulonis, Ph.D.
General Manager
CWM Chemical Services, Inc.
P.O. Box 200
1550 Balmer Road
Model City, New York 14107

Dear Dr. Stanulonis:

This letter responds to the original December 16, 1986 application and supplemental documents submitted by CWM Chemical Services, Inc. (CWM) requesting approval, under the Toxic Substances Control Act (TSCA), by the Regional Administrator of the United States Environmental Protection Agency (EPA), Region II, for the utilization of a chemical waste landfill, Secure Landfill (SLF) No. 12, for the disposal of polychlorinated biphenyls (PCBs) at CWM's Model City, New York facility. EPA Region II hereby grants the requested approval, effective on the date of this letter, based upon the findings and subject to the limitations and conditions specified below.

Please be aware that this approval is only applicable to the disposal of PCBs in Cell B and Cell C of SLF No. 12 and disposal of PCBs in any other cells of SLF No. 12 shall constitute noncompliance with the conditions of this approval.

A public comment period was held from May 17, 1989 to June 21, 1989. A responsiveness summary to these comments was included as part of the attachments to the permit issued to CWM for SLF No. 12 under the Hazardous And Solid Waste Amendments of 1984. After review of the application and supporting documents, which are listed in Appendix 2, I have determined that SLF No. 12 merits approval as a chemical waste landfill for the disposal of PCBs. This approval is based upon my evaluation that this landfill meets all the requirements of 40 C.F.R. § 761.75 with the following exception:

The landfill is not located at least 50 feet higher than the nearest groundwater elevation, and its orientation to the highest groundwater table is not in strict compliance with the requirements of 40 C.F.R. § 761.75(b)(3). However, the landfill is designed to collect internal leachate via collection sumps and is equipped with two low permeability composite liners composed of clay and high density polyethylene. It is my assessment, based on the information submitted by CWM, that this landfill, if operated as outlined in this approval, should prevent leachate migration.

I have determined that the above cited waiver will not present an unreasonable risk of injury to health or the environment from PCBs.

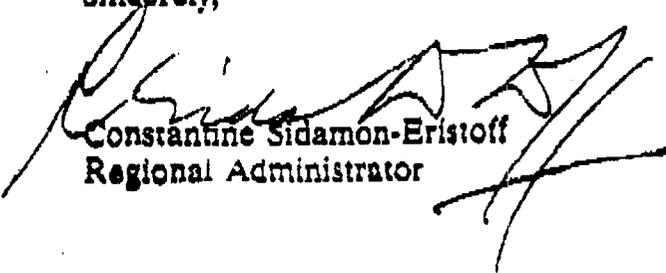
In addition to PCB disposal in SLF No. 12, this approval addresses the management of TSCA regulated leachate from SLF No. 12 and updates the leachate management requirements for all TSCA regulated leachate at the entire Model City facility. The amended leachate management provisions are found in Appendix 3 to this approval.

This approval is issued based on CWM's compliance with the technical landfill design requirements of 40 C.F.R. § 761.75 (Chemical waste landfills) except as detailed above. I emphasize that CWM's Model City facility must comply with all conditions of this approval and any other applicable federal, state and local rules or regulations. Failure to comply with any condition of this approval shall constitute a violation of 40 C.F.R. § 761.75 which may result in an enforcement action and/or revocation, suspension, or modification of this approval.

Furthermore, receipt of evidence that a misrepresentation of any material fact has been made in the CWM application, or that relevant facts have not been disclosed, shall constitute sufficient cause for revocation, suspension, or modification of this approval in addition to any enforcement action. EPA may seek the maximum statutory penalties for any violation of PCB disposal regulations, including 40 C.F.R. § 761.60, 40 C.F.R. § 761.75, and the conditions of this approval.

This approval for CWM to operate SLF No. 12 for PCB disposal is granted subject to the conditions in the three appendices to this letter and consistent with materials and data in CWM's application and supporting documents. Any change or modification in the plan, specifications, or operational procedures at CWM's facility, which are incorporated in this approval, must receive prior written approval from EPA.

Sincerely,


Constantine Sidamon-Eristoff
Regional Administrator

Enclosures

cc: Mr. Thomas Jorling
Commissioner, NYSDEC w/encl.

**ENSCO
PERMITS AND AUTHORIZATIONS
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THE ARKANSAS DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
HAZARDOUS WASTE MANAGEMENT PERMIT

EPA I.D. Number: ARD069748192
Permittee: ENSCO, Inc.
Facility Location: El Dorado, Arkansas

Permit Number: 10-H
CSN:70-0098

Pursuant to the federal Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA), as amended (42 U.S.C. 6901, et. seq.), the Hazardous and Solid Waste Amendments of 1984 (HSWA), the Arkansas Hazardous Waste Management Act (Act 406 of 1979, Ark. Code Ann. 1987 Section 8-7-101, Sections 8-7-201 et. seq. and Sections 8-7-226 et. seq.) the Arkansas Solid Waste Management Act (Act 237 of 1971) and the Arkansas Hazardous Waste Management Code (HWM Code), a permit is issued by the Arkansas Department of Pollution Control and Ecology to ENSCO, Inc. (hereinafter called the Permittee) to operate a hazardous waste treatment and storage facility at the location stated above.

This permit consists of the conditions contained herein (including those in Attachments 1 through 15) and the applicable standard and general facility conditions developed in accordance with the Arkansas HWM Code and the provisions of Title 40, Code of Federal Regulations (40 CFR) Parts 260, 261, 264, 266, 268, 270, and 124, as specified in the permit. Applicable State and Federal Regulations are those which are in effect on the date of issuance of the permit, such Federal Regulations adopted by reference in Section 3 of the Arkansas HWM Code (See 40 CFR 270.32(c) and Attachment 1). Through the course of the Permittee's operation under this permit and the State enforcement of the provisions of this permit, conflicts in requirements may arise between the application specifications, State and Federal regulations and conditions of the permit. For the purposes of resolving conflicts between requirements to which the Permittee is subject, the following hierarchy and order of authority will govern in the Permittee's duty to comply: 1) Regulations (Attachment 1), 2) Special Conditions (Part IV), 3) General Facility Standards (Part II), 4) Standard Conditions (Part I), 5) Conditions/Standards Specific to Activity (Part III), and 6) Attachments 2 through 15. In the case of requirements which differ due to stringency, the more stringent requirement will govern regardless of the order of authority stated, as determined by the Director. Nothing contained herein shall negate the Permittee's duty to comply with the regulations and this permit or the State ability to enforce the regulations and this permit. The applicable regulations are those which are in effect on the date of issuance of this permit. The Permittee shall maintain a copy of the final Part B application for the permit at the facility through the duration of this permit.

This permit is based on the assumption that all information submitted in the permit application attached to the Permittee's letter dated August 21, 1987 (hereinafter referred to as the application) is accurate and that the facility will be constructed and operated as specified in the application and the conditions of this permit. Any inaccuracies found in this information may be grounds for the termination or modification of the permit (See 40 CFR 270.41, 270.42, and 270.43) and possible enforcement action.

This permit is effective when it is legally effective under Arkansas law. Under Arkansas law, it is effective as of June 26, 1988 and shall remain in effect until June 26, 1998 unless revoked and reissued, or terminated (40 CFR 270.41 and 270.43) or continued in accordance with the Arkansas HWM Code.

Issued this 26th day of May, 1988



Paul Means
Director
Arkansas Department of
Pollution Control and Ecology

STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY

8001 NATIONAL DRIVE, P.O. BOX 8913

LITTLE ROCK, ARKANSAS 72219-8913

PHONE:(501)562-6533

FAX:(501)562-2541

Certified Mail; Return Receipt Requested
P 762 178 975

January 8, 1992

Harry LaCoste
Vice President/General Manager
ENSCO, Inc.
P.O. Box 1957
El Dorado, AR 71731

RE: ENSCO; Permit Modification

Dear Mr. LaCoste:

This letter serves as notification that the Department has made a final decision to issue a major permit modification (Permit 10-HR-1) for ENSCO, located in El Dorado, Arkansas.

The public notice was published in the El Dorado News Times on May 4, 1991. The required public hearing was held at the Arkansas Power and Light Reddy Room, in El Dorado, Arkansas on June 20, 1991. Several comments were received at the public hearing in addition to written comments. All Departmental responses to comments can be found in the Responsiveness Summary.

Please find enclosed the Responsiveness Summary, the final Fact Sheet, the modified Permit, and the Notice of Decision.

Sincerely,



Mike Bates, Chief
Hazardous Waste Division

DW:LTR338

ENCLOSURES

cc: Jerry Williams, Manager, Technical Branch, HWD
Derick Warrick, Engineer, Technical Branch, HWD
Mike Overbay, EPA Region 6, Dallas, TX

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE TSD FACILITY

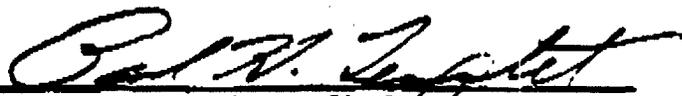
PERMITTEE: Rollins Environmental Services (LA) Inc. (RESLA)
PERMIT NUMBER: LAD 010395127-P
FACILITY: 13351 Scenic Highway (U.S. 61)
LOCATION: Post Office Box 74137
Baton Rouge, Louisiana 70807-4137

This permit is issued to the Permittee by the Louisiana Department of Environmental Quality (LDEQ) and the U. S. Environmental Protection Agency (EPA) under the authority of the Louisiana Hazardous Waste Control Law R.S. 30:2171 et seq., and the regulations adopted thereunder and by the EPA under the authority of the 1984 Hazardous and Solid Waste Amendments (HSWA) to Resource Conservation and Recovery Act (RCRA) to Rollins Environmental Services (LA), Inc. (hereafter called the permittee), to operate a hazardous waste treatment, storage, and disposal (TSD) facility located a Baton Rouge, Louisiana at latitude 30° 34' and longitude 90° 13'.

The permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein and the applicable regulations as specified in this permit. Applicable regulations are those which are in effect on the date of issuance of this permit.

This permit is based on the assumption that the information provided to LDEQ by the permittee is accurate. Further, this permit is based in part on the provisions of Sections 206, 212, and 224 of the HSWA of 1984, which modify Sections 3004 and 3005 of RCRA. In particular, Section 206 requires corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage or disposal facility seeking a permit, regardless of the time at which waste was placed in such unit. Section 212 provides authority to review and modify the permit at any time. Any inaccuracies found in the submitted information may be grounds for the termination, modification or revocation and reissuance of this permit (see LAC 33:V.323) and potential enforcement action. The permittee must inform the administrative authority of any deviation from or changes in the information in the application which would affect the permittee's ability to comply with the applicable regulations or permit conditions.

This permit is effective as of March 21, 1991, and shall remain in effect until March 21, 2001, unless revoked and reissued, modified or terminated in accordance with LAC 33:V.705.


Paul H. Templet, Ph.D., Secretary
Dept. of Environmental Quality

2/4/91
Date



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI

1448 ROSS AVENUE, SUITE 1200

DALLAS, TEXAS 75202

June 10, 1988

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Harry T. LaCoste
Plant Manager
ENSCO, Inc.
American Oil Road
P.O. Box 1957
El Dorado, Arkansas 71731-1957

Re: Transmittal of Hazardous Waste Permit
for ENSCO, Inc. ARDO69748192

Dear Mr. LaCoste:

Enclosed is a copy of your permit to operate a hazardous waste facility, pursuant to the Hazardous and Solid Waste Amendments of 1984 (HSWA). The Arkansas Department of Pollution Control and Ecology (ADPCE) has been delegated authority to issue hazardous waste permits under the Resource Conservation and Recovery Act (RCRA). ADPCE has not yet been delegated authority for HSWA. Therefore, the enclosed HSWA permit issued by the Environmental Protection Agency, combined with the RCRA permit issued by ADPCE on May 26, 1988, constitutes a full RCRA permit.

Also enclosed is the Notice of Decision and the Response to HSWA comments made during the public comment period. Please note that the Notice of Decision includes reference to the procedures for appealing the decision on a RCRA permit.

If you have any questions, please contact William Honker of my staff at (214) 655-6785.

Sincerely yours,

Allyn M. Davis

Allyn M. Davis
Director
Hazardous Waste Management Division (6H)

Enclosure

cc: Paul Means w/enclosure
Arkansas Department of Pollution
Control and Ecology

STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY

8001 NATIONAL DRIVE, P.O. BOX 9583
LITTLE ROCK, ARKANSAS 72209
PHONE: (501) 562-7444
FAX: (501) 562-4632

August 15, 1990

Harry LaCoste
Enesco, Inc.
P.O. Box 1957, American Drive
El Dorado, AR 71731

Dear Mr. LaCoste:

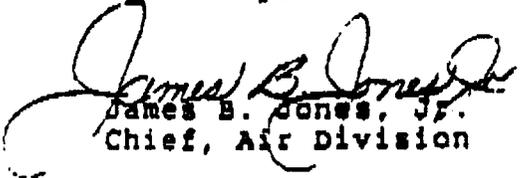
The enclosed Permit No. 1009-A is your authority to construct, operate, and maintain the equipment and/or control apparatus as set forth in your application dated or last amended February 9, 1990.

After considering the facts and requirements of Act 472 of 1949, as amended (Ark. Code. Ann. Sec. 8-4-101 et seq.) and implementing regulations, I have determined that Permit No. 1009-A for the construction, operation and maintenance of an air pollution control system for Enesco, Inc. be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under Section 4, Part III, of Regulation No. 8, Arkansas Department of Pollution Control and Ecology Administrative Procedures, within 30 days after service of this decision.

All persons submitting written comments during this 30 day period, and all other persons entitled to do so, may request an adjudicatory hearing and Commission review on whether the decision of the Director should be reversed or modified. Such a request shall be in the form and manner required by Section 4, Part III, of Regulation No. 8.

The permit is subject to the conditions specified therein and the conditions, if any, which are specified in the enclosed summary report.

Sincerely,


James B. Jones, Jr.
Chief, Air Division

Enclosure

Arkansas Department of Pollution Control and Ecology
Division of Air Pollution Control

Summary Report Relative to Permit Application

Submitted By: ENSCO Inc.
El Dorado, Arkansas (Union County)

CSN: 700098 Permit No.: 1009-A Date Issued: 8/15/90

Submittals: 11/5/87, 8/17/89, 8/23/89, 11/16/89, 12/15/89,
1/11/90, 2/9/90, 5/31/90, 8/6/90

Summary

ENSCO operates an incinerator facility in El Dorado, Arkansas. This facility has been permitted under several air permits. This permit will consolidate all emission sources at the El Dorado facility into one permit.

This permit supersedes and voids the following air permits issued to ENSCO; Permit No. 0249-AR-3, Permit No. 0461-A, Permit No. 0509-A, Permit No. 0753-A, Permit No. 0754-A.

This permit establishes ENSCO's El Dorado, Arkansas, facility as a major stationary source. Baseline emission figures in tons per year may be found in Table II.

At the main unit ENSCO receives wastes to be incinerated in gaseous, liquid and solid forms. Wastes are fed into either of two rotary kilns; liquid and gaseous wastes are fed directly into the thermal oxidation unit (TOU).

This facility has air emissions regulated by the Toxic Substances

Installation: N/A	Operation: N/A
Control Equipment: \$N/A	Total Project: \$N/A
Reviewed By: David W. Morrow	Approved By: J.B. Jones
Applicable Regulation: Air Code	SIP

**AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL POLLUTANT DISCHARGE
ELIMINATION SYSTEM AND THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT**

In accordance with the provisions of the Arkansas Water and Air Pollution Control Act (Act 472 of 1949, as amended, Ark. Code Ann. 8-4-101 et seq.), and the Clean Water Act (33 U.S.C. 1251 et seq.),

ENSCO, Inc.
American Oil Road
P.O. Box 1957
El Dorado, AR 71730

is authorized to discharge from a facility located in

Section 26, 34, and 35, Township 17 South, Range
15 West in Union County, State of Arkansas.

Outfall 001 - Latitude : 33 deg. 12' 30"
Longitude: 92 deg. 37' 52"

Outfall 003 - Latitude : 33 deg. 13' 00"
Longitude: 92 deg. 38' 00"

Outfall 007 - Latitude : 33 deg. 13' 00"
Longitude: 92 deg. 37' 30"

Outfall 009 - Latitude : 33 deg. 12' 06"
Longitude: 92 deg. 37' 29"

to receiving waters named:

Boggy Creek in Segment 2D in the Ouachita River Basin.

in accordance with effluent limitations, monitoring requirements, and other conditions set forth in Parts I, II (Version 2), III, and IV (Version 2) hereof.

This permit shall become effective on *November 1, 1990.*

This permit and the authorization to discharge shall expire at midnight,
October 31, 1995.

Signed this *28th* day of *September, 1990.*



Chuck C. Bennett
Chief, Water Division
Arkansas Department of Pollution Control and Ecology

ENSCO, INC.
AMERICAN OIL ROAD
L DORADO, AR 71730

ROLLINS, INC.
3351 SCENIC HIGHWAY
BATON ROUGE, LA 70807

WM
135 BALMER ROAD
MODEL CITY, NY 14107