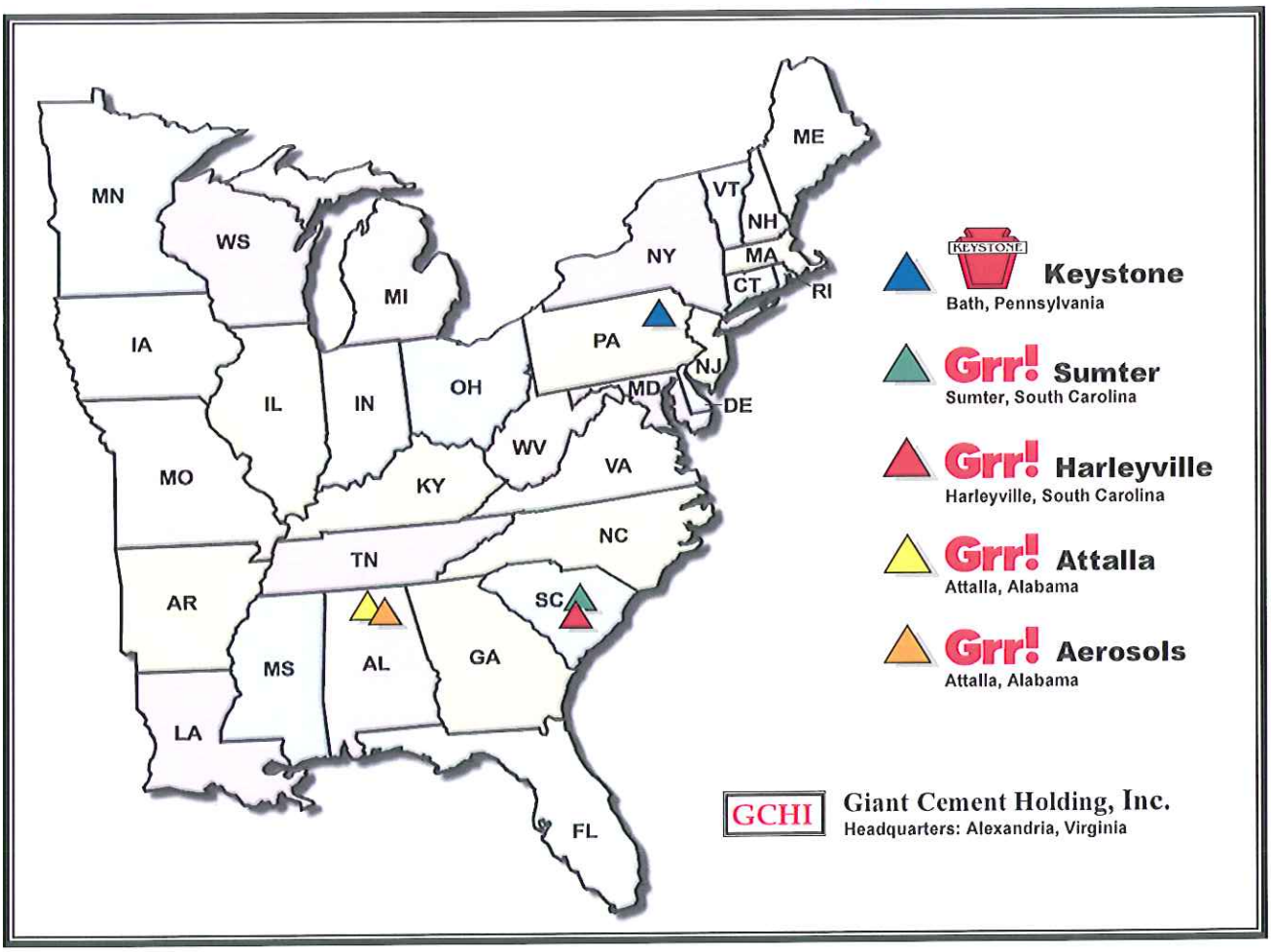
Grr!

Giant Resource Recovery – Attalla

Table of Contents

Grr!

The Giant Resource Recovery Facilities



Resource Recovery and Energy Reutilization

Safe, Reliable, Permanent

9/18/17

Giant Cement Holding, Inc.
Giant Resource Recovery, Inc.

A History of Resource Recovery and Energy Reutilization

Giant Cement Holding, Inc., (GCHI) manufactures high quality Portland cement through its subsidiaries **Giant Cement Company** in Harleyville, SC, and **Keystone Cement Company** in Bath, PA. For almost forty years, the facilities have carefully blended and beneficially reused hazardous and non-hazardous wastes as supplemental fuel in their cement production processes. **Giant Resource Recovery, Inc. (GRR)**, a subsidiary of GCHI, is the environmental and waste management division responsible for the resource recovery and waste fuels programs. **GRR-Harleyville** is co-located with Giant Cement while the resource recovery operation in Bath shares the Keystone name.

In 1998, GRR furthered its dedication to resource recovery through the addition of M&M Chemical and Equipment, a waste processing and container management facility located in Attalla, AL. A year later, GRR acquired the Sumter, SC, waste management and solvent recovery operation previously known as Omni-Southeastern Chemical and Solvents. As members of the Giant family, these facilities are now named **GRR-Attalla** and **GRR-Sumter.**

GRR grew yet again in early 2002 with the opening of **GRR Aerosols, Inc.,** in Arvonia, VA. GRR Aerosols offers the unique capability of disposing of wastes in aerosol containers by recycling 100% of the components in an innovative closed-loop system. GRR Aerosols expanded and relocated to Attalla, AL, in late 2007. With increased capacity and a broadened list of acceptable hazardous waste codes, GRR Aerosols handles a greater volume and more types of aerosol wastes than any company in North America.

Since its inception, GRR has developed significant proprietary technology to efficiently use solid industrial wastes as a reliable fuel source. The Harleyville facility completed an extensive $130 million expansion in 2005 which maximizes the use of solid fuel. The following year, Keystone unveiled a $230 million modernization project. Complemented by GRR's industry-leading ability to process waste into fuel, Giant Cement and Keystone Cement are two of the most advanced cement plants in the United States.

As its history shows, GRR actively seeks out new technologies and methods of resource recovery and energy reutilization. By combining more than 130 years of experience with a demonstrated commitment to environmental stewardship, the GRR family of companies provides generators with an unparalled range of safe, reliable, and permanent waste management services.

Grr!

Giant Resource Recovery Facilities

GRR–Sumter Sumter, SC	Processes containerized and bulk liquids, solids, and sludges
GRR–Attalla Attalla, AL	Processes containerized and bulk liquids, solids, and sludges
GRR Aerosols Attalla, AL	Recycles and destroys aerosol cans; processes steel drums for reconditioning
GRR–Harleyville Harleyville, SC	Co-located with Giant Cement; blends and burns bulk solid and liquid waste-derived fuel
Keystone Cement Bath, PA	Co-located with Keystone Cement manufacturing facility; blends and burns bulk liquid waste-derived fuel

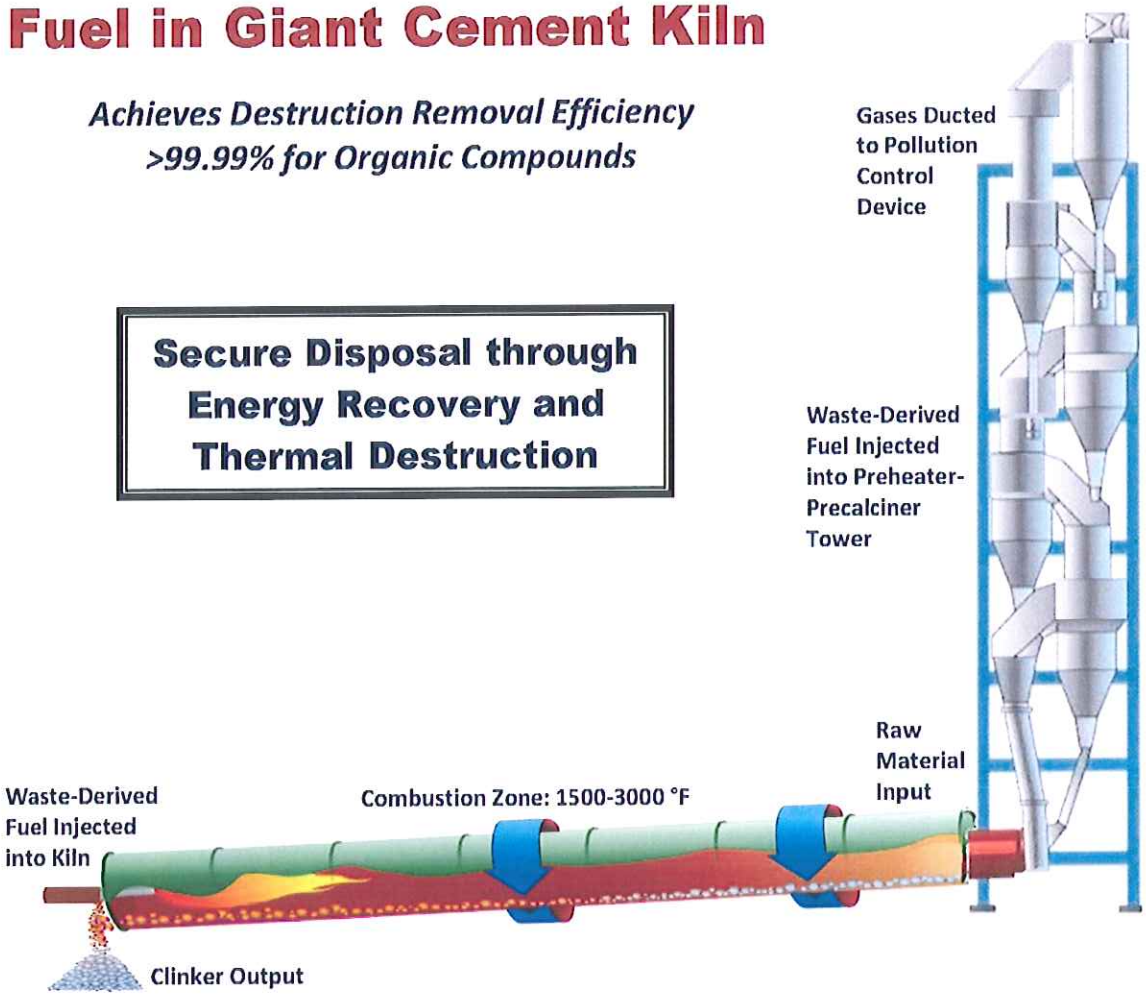
9/18/17

Grr!

The Use of GRR's Waste-Derived Fuel in Giant Cement Kiln

Achieves Destruction Removal Efficiency >99.99% for Organic Compounds

Secure Disposal through Energy Recovery and Thermal Destruction



9/18/17

Grr! Giant Resource Recovery – Attalla

Giant Resource Recovery – Attalla, Inc.
1229 Valley Drive
Attalla, AL 35954

Phone: (800) 637-4023
Fax: (256) 538-1836

Facility Contacts: Ken Bolcar – Sales Manager
Phone – (800) 637-4023

Tina Garrard – Customer Service Manager
Phone – (800) 637-4023

Permit Status: **EPA ID No. ALD070513767**
RCRA Part B Permit for treatment and storage – Originally issued 10/2/1995; expires 8/28/2027
Air Permit Nos. 307-0019-X002 through 307-0019-X011 – Issued 2/1/2006; no expiration
NPDES Permit No. AL0054542 – Issued 4/1/2008; expires 5/31/2023
Permitted Capacity:
Container Storage – 2,112 55-gallon drums (or equivalent)
Bulk Storage and Treatment Tanks – 160,000 gallons
Process Treatment Tank – 1 unit
Total Storage and Treatment Tank Capacity – 344,000 gallons

GRR-Attalla is located on 296 acres of rural property 60 miles northeast of Birmingham, AL. GRR-Attalla processes waste for final disposal, primarily to be burned as fuel. The facility manages hazardous and non-hazardous materials including liquids, sludges, and solids in bulk and in containers. GRR-Attalla provides the essential link for many wastes that are not suitable for shipment directly to resource recovery kilns. Blended fuels are shipped by rail and tanker truck to RCRA-permitted/interim status industrial furnaces such as cement kilns. Any non-blendable hazardous solids are shipped to other permitted facilities for final disposal. Non-hazardous solids are bulked and sent to permitted landfills.

Grr!

Fuel Blending

GRR – Attalla

Fuel blending is accomplished through the consolidation of drummed and bulk materials in above-ground storage tanks. A mix tank is used to liquefy sludges and similar semi-solid materials. Once these materials have been recycled into fuel, they can be safely and efficiently burned in cement kilns. This gives both large and small generators the peace of mind that only comes from fuel blending and thermal destruction.

SAMPLE ACCEPTANCE TESTING

TANKER TRAILER

VAN TRAILER
(CONTAINERS)

SAMPLE ACCEPTANCE TESTING (STAGING AREA)

STORAGE

DRUM DEHEADING

DRUM WANDING/ PUMPING (EXISTING)

STORAGE TANKS

TANKER TRAILER

WEIGH

TANKER TRAILER

OUTGOING

VAN TRAILER
(TOTES)

SAMPLE ACCEPTANCE TESTING (STAGING AREA COMPACTOR BLDG)

STORAGE

DEPACKING CONSOLI-DATION

DRUM TIPPING (EXISTING)

(EXISTING) DISPERSION TANK

FILTER

TANKER TRAILER

CARDBOARD

VAN TRAILER

OUTGOING

SOLIDS PROCESSING

RAILCARS

OUTGOING

USED ONSITE - DRUM FURNACE

PROPELLENT STORAGE TANK

COMPACTOR UNIT

GAS

SOLIDS SHREDDER

ROLL-OFF BOX OR DUMP

CONSOLIDATION IN TO DRUMS /HOPPER

RAIL

OUTGOING

RAILCARS

SHIPPED OFFSITE/CEMENT KILN

SOLVENT STORAGE TANKS

LIQUID

TANKER TRAILER

VAN TRAILER

VAN TRAILER

OUTGOING

METAL

ROLL-OFF STORAGE

SHIPPED OFFSITE/RECYCLED

ONSITE DRUM FURNACE

VAN TRAILER

OUTGOING

LEGEND

- EMPTY DRUM
- FULL DRUM
- DRUM'S CONTENTS
- BLENDED FUEL
- SOLVENT
- SOLVENT/PROPELLANT
- CARDBOARD

FIGURE NO 4-6

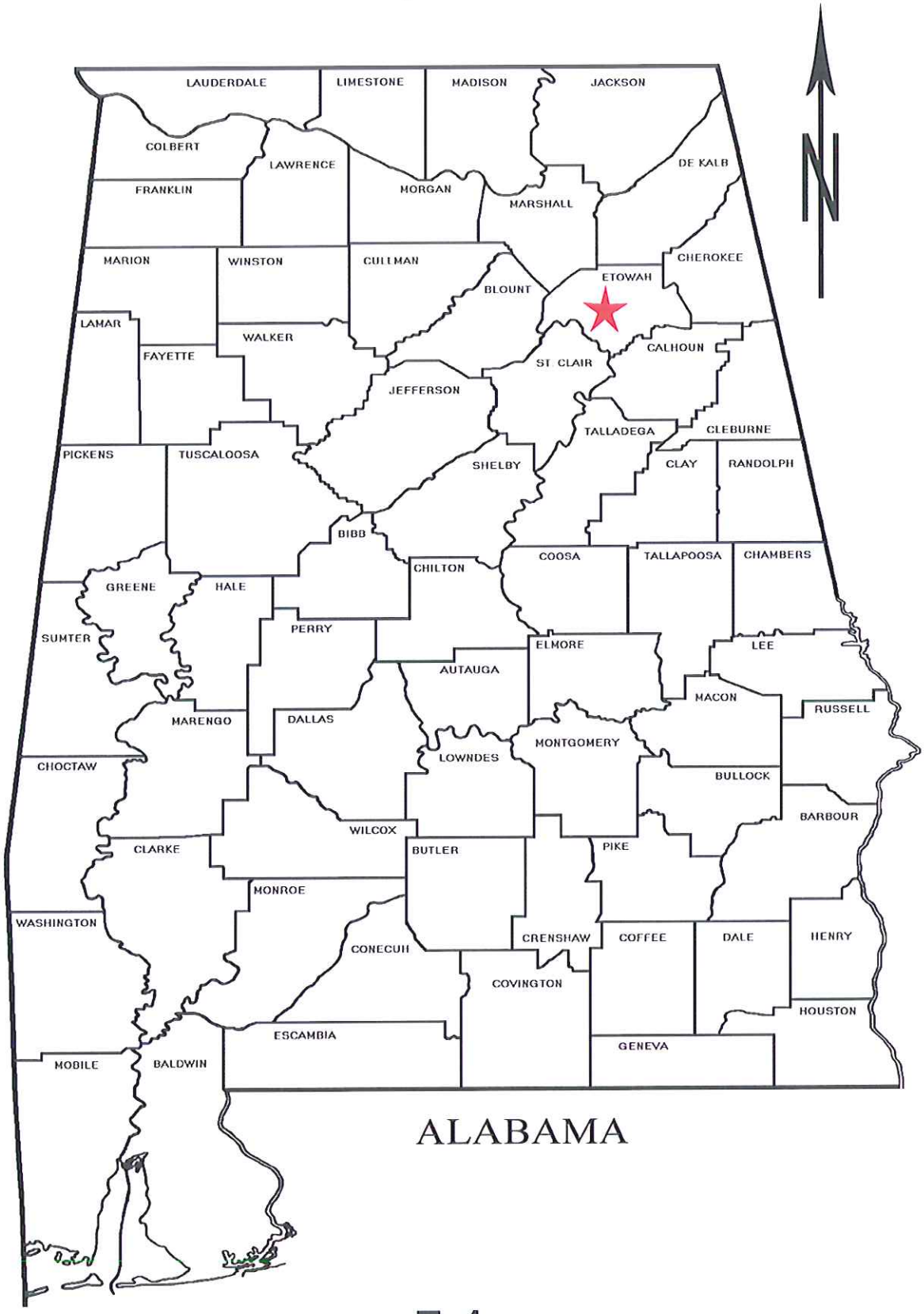
Giant Resource Recovery – Attalla, Inc.

SIMPLIFIED PROCESS FLOW SCHEMATIC

CONTAINER PROCESSING FACILITY

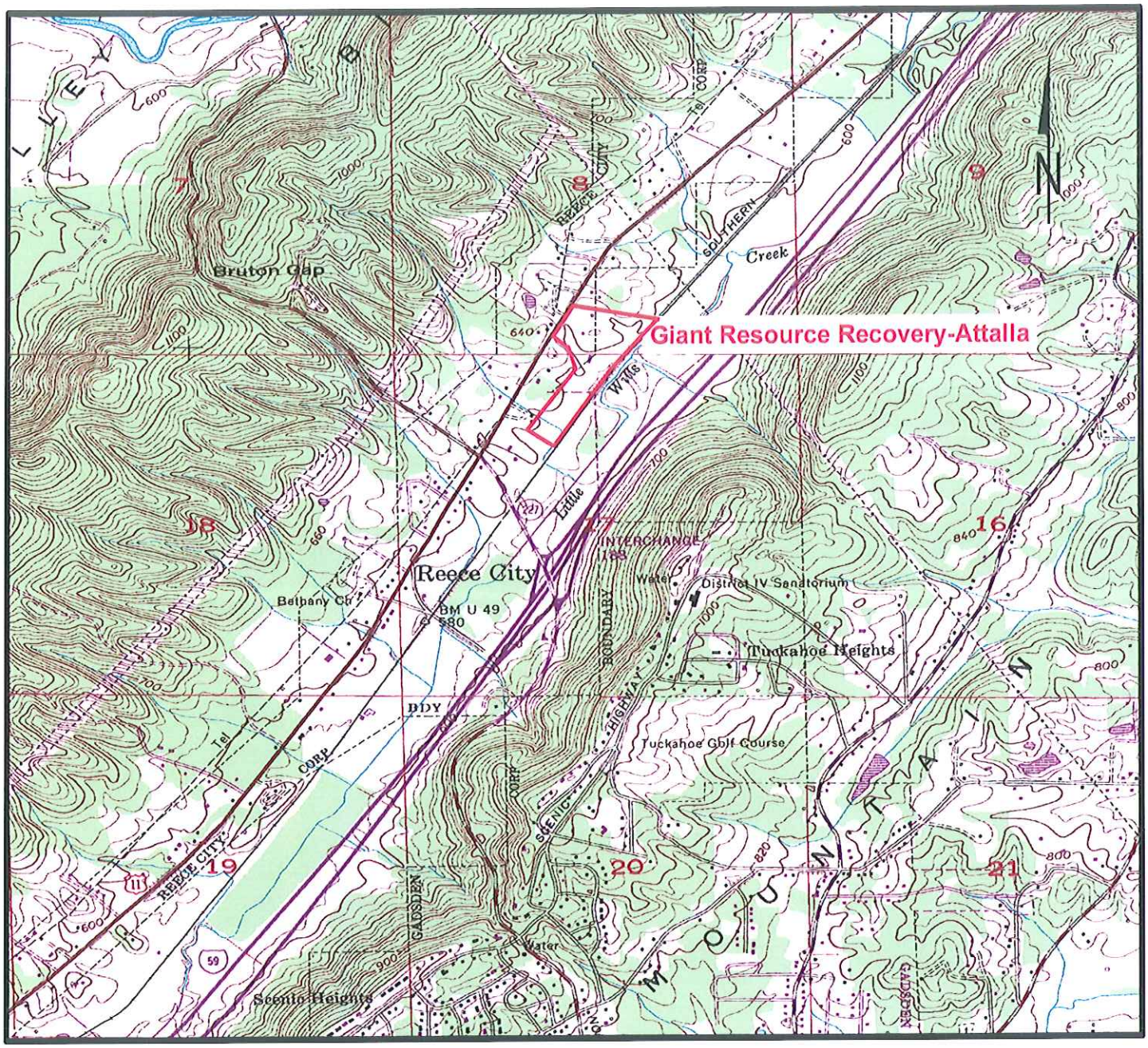
DATE	1-14-16
SCALE	NONE
DRAWN BY	ARL
CHECKED BY	AE
DRAWING NO.	160114 Fig 4-6 SimProcess Flow Schematic
REV.	0

Giant Resource Recovery- Attalla
Attalla, Alabama



F-1

Facility Location Map



SCALE 1:24 000

1 0 1 MILE

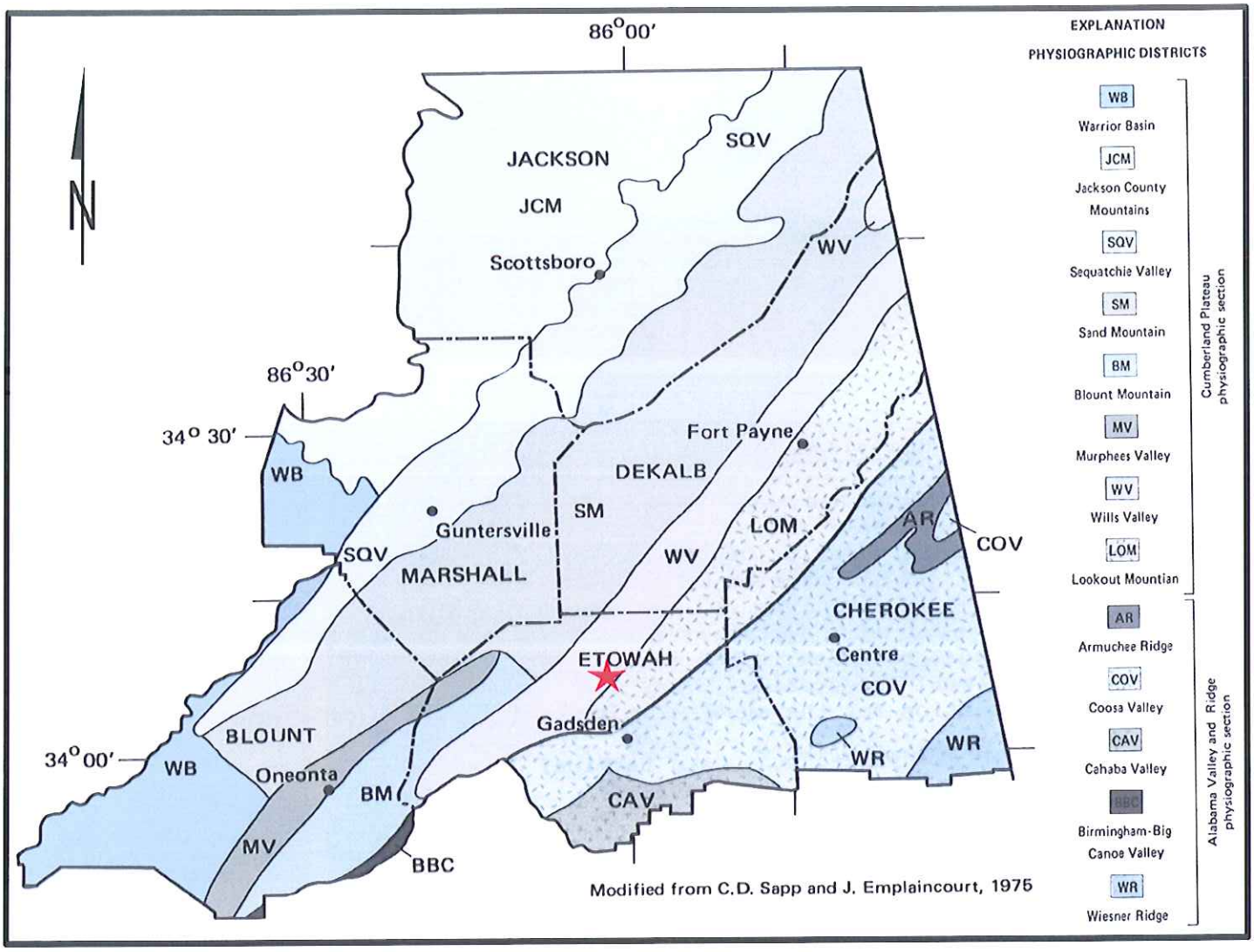
1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

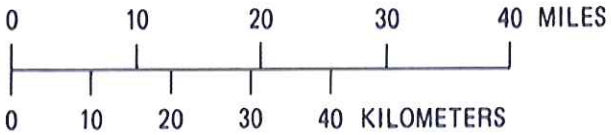
1 .5 0 1 KILOMETER

CONTOUR INTERVAL 20 FEET
DASHED LINES REPRESENT HALF INTERVAL CONTOURS
NATIONAL GEODETIC VERTICAL DATUM OF 1929

F-2

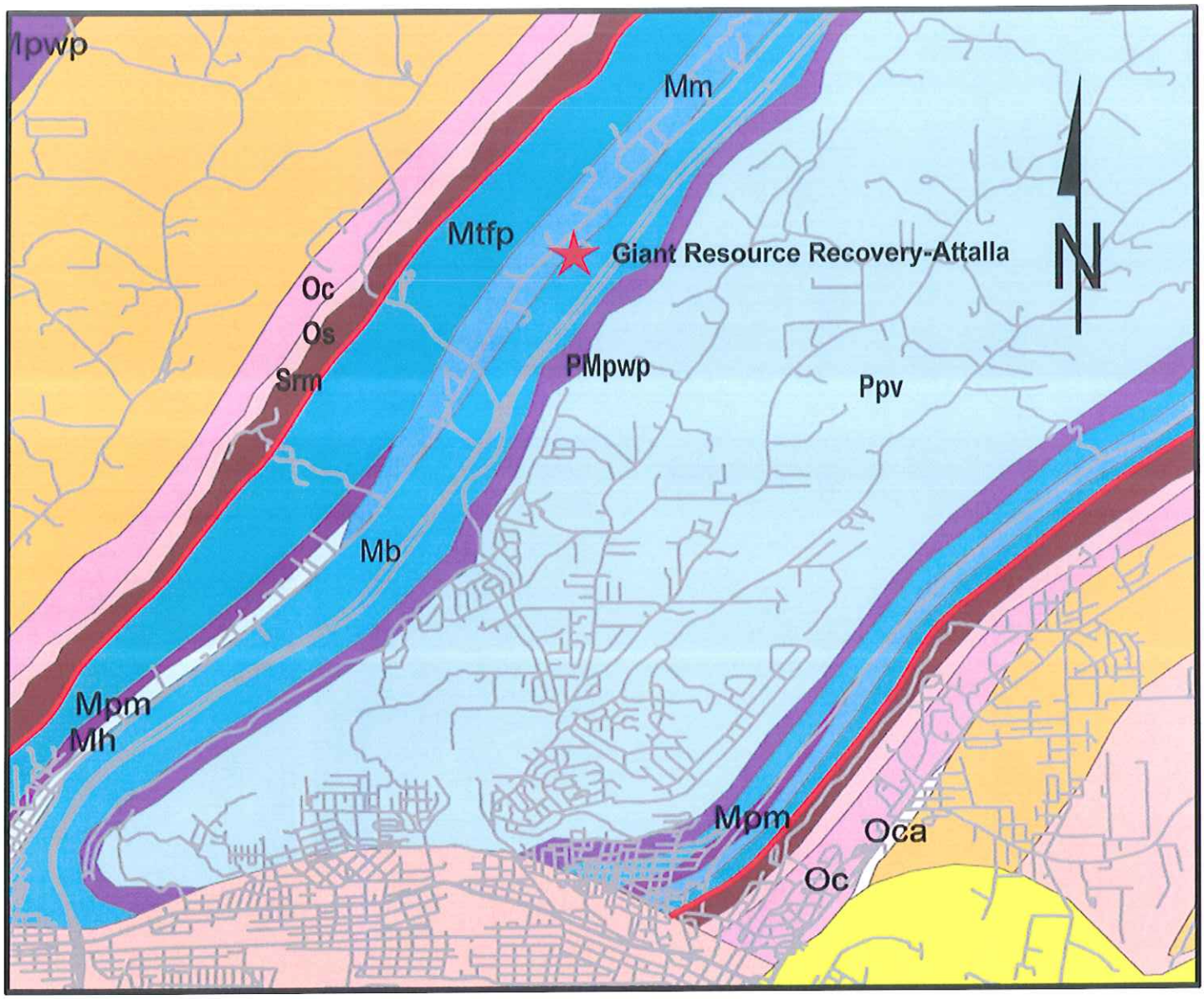
GRR Facility Area Topographic Map





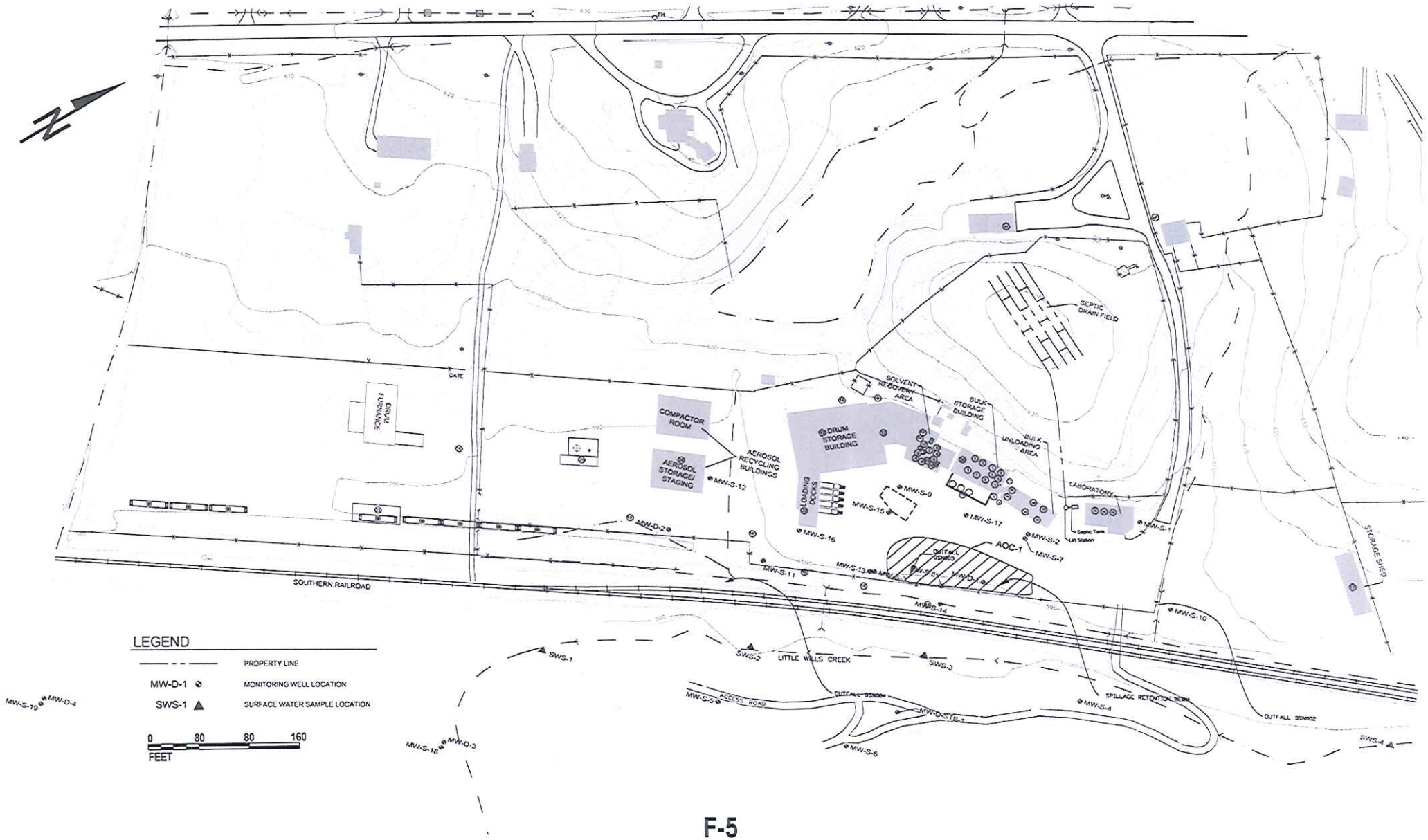
F-3

Physiographic Region Map



F-4

Regional Geologic Map



F-5

GRR Facility Map

Grr!

Permitted Waste Codes
GRR - Attalla

Approved waste codes for bulk liquid fuels and fuel blendable material in drums:

D001	F001	K001	K087	P001	U001	U053	U105	U149	U203
D002	F002	K002	K088	P006	U002	U055	U106	U150	U204
D004	F003	K003	K093	P022	U003	U056	U107	U151	U205
D005	F004	K004	K094	P028	U004	U057	U108	U152	U207
D006	F005	K005	K095	P029	U005	U063	U109	U153	U208
D007	F006	K006	K096	P030	U006	U066	U110	U154	U209
D008	F007	K007	K100	P050	U007	U067	U111	U155	U210
D009	F008	K008	K101	P064	U008	U068	U112	U156	U211
D010	F009	K009	K102	P074	U009	U069	U113	U157	U213
D011	F010	K010	K103	P075	U010	U070	U114	U158	U214
D012	F011	K011	K104	P098	U011	U071	U115	U159	U215
D013	F012	K013	K105	P105	U012	U072	U116	U161	U216
D014	F024	K014	K114	P106	U014	U073	U117	U162	U217
D015	F032	K015	K115	P120	U015	U074	U118	U163	U218
D016	F034	K016	K141		U016	U075	U119	U164	U219
D017	F035	K017	K142		U017	U076	U120	U165	U220
D018	F037	K018	K143		U018	U077	U121	U166	U221
D019	F038	K019	K144		U019	U078	U122	U167	U222
D020	F039	K021	K145		U020	U079	U123	U168	U223
D021		K022	K147		U021	U080	U124	U169	U225
D022		K023	K148		U022	U081	U125	U170	U226
D023		K024	K156		U023	U082	U126	U171	U227
D024		K025	K157		U024	U083	U127	U172	U228
D025		K026	K158		U025	U084	U128	U174	U235
D026		K027	K159		U026	U085	U129	U179	U236
D027		K028	K161		U027	U086	U130	U180	U237
D028		K029	K169		U028	U087	U131	U181	U238
D029		K030	K170		U029	U088	U132	U182	U239
D030		K035	K171		U030	U089	U133	U183	U240
D031		K046	K172		U031	U090	U134	U184	U243
D032		K048			U032	U091	U136	U185	U244
D033		K049			U036	U092	U137	U186	U247
D034		K050			U037	U093	U138	U187	U328
D035		K051			U039	U094	U140	U188	U359
D036		K052			U043	U095	U141	U190	U367
D037		K060			U044	U096	U142	U191	U243
D038		K061			U045	U097	U143	U192	U244
D039		K062			U047	U098	U144	U193	U247

D040	K083	U048	U099	U145	U194	U328
D041	K084	U050	U101	U146	U196	U359
D042	K085	U051	U102	U147	U200	U367
D043	K086	U052	U103	U148	U201	

Approved waste codes for solids to be bulked and shipped to Giant Cement:

D001	F001	K001	K087	P001	U001	U053	U105	U149	U202
D002	F002	K002	K088	P006	U002	U055	U106	U150	U203
D004	F003	K003	K093	P022	U003	U056	U107	U151	U204
D005	F004	K004	K094	P028	U004	U057	U108	U152	U205
D006	F005	K005	K095	P029	U005	U063	U109	U153	U207
D007	F006	K006	K096	P030	U006	U066	U110	U154	U208
D008	F007	K007	K100	P050	U007	U067	U111	U155	U209
D009	F008	K008	K101	P053	U008	U068	U112	U156	U210
D010	F009	K009	K102	P055	U009	U069	U113	U157	U211
D011	F010	K010	K103	P064	U010	U070	U114	U158	U212
D012	F011	K011	K104	P074	U011	U071	U115	U159	U213
D013	F012	K013	K105	P075	U012	U072	U116	U161	U214
D014	F024	K014	K114	P098	U014	U073	U117	U162	U215
D015	F032	K015	K115	P105	U015	U074	U118	U163	U216
D016	F034	K016	K141	P106	U016	U075	U119	U164	U217
D017	F035	K017	K142	P120	U017	U076	U120	U165	U218
D018	F037	K018	K143	P127	U018	U077	U121	U166	U219
D019	F038	K019	K144	P189	U019	U078	U122	U167	U220
D020	F039	K021	K145		U020	U079	U123	U168	U221
D021		K022	K147		U021	U080	U124	U169	U222
D022		K023	K148		U022	U081	U125	U170	U223
D023		K024	K156		U023	U082	U126	U171	U225
D024		K025	K157		U024	U083	U127	U172	U226
D025		K026	K158		U025	U084	U128	U174	U227
D026		K027	K159		U026	U085	U129	U179	U228
D027		K028	K161		U027	U086	U130	U180	U230
D028		K029	K169		U028	U087	U131	U181	U231
D029		K030	K170		U029	U088	U132	U182	U232
D030		K035	K171		U030	U089	U133	U183	U235
D031		K046	K172		U031	U090	U134	U184	U236
D032		K048			U032	U091	U136	U185	U237
D033		K049			U036	U092	U137	U186	U238
D034		K050			U037	U093	U138	U187	U239
D035		K051			U039	U094	U140	U188	U240
D036		K052			U043	U095	U141	U190	U242
D037		K060			U044	U096	U142	U191	U243

D038	K061	U045	U097	U143	U192	U244
D039	K062	U047	U098	U144	U193	U247
D040	K083	U048	U099	U145	U194	U328
D041	K084	U050	U101	U146	U196	U359
D042	K085	U051	U102	U147	U200	U367
D043	K086	U052	U103	U148	U201	

Waste Approval Procedures

GRR – Attalla

To obtain approval for a new waste stream, please submit the following prior to shipment:

1. GRR-Attalla Waste Material Profile Form
2. Benzene NESHAP Questionnaire
3. Credit Application – New customers only
4. TC Rule Certification Form – Non-hazardous only
5. Any available analytical data, SDSs, and Product Record Sheets to substantiate and clarify accuracy and facilitate quick approval

Samples are not required for approval provided the waste is accurately characterized on the profile. However, if the waste material has characteristics that may cause processing problems (such as compatibility, viscosity, etc.), a one-quart representative sample should be submitted.

Completed profiles and other information should be mailed or faxed to:

Approvals
GRR-Attalla
1229 Valley Drive
Attalla, AL 35954
Phone: (256) 538-3800
Fax: (256) 538-1836 or (256) 538-2634

For questions concerning approvals, profiles, or shipping documents, please contact Ken Bolcar or Tina Garrard at (800) 637-4023.

Below is the official information needed to complete manifests for materials approved into GRR-Attalla:

Giant Resource Recovery-Attalla, Inc.
1229 Valley Drive, Highway 11 North
Attalla, AL 35954, Reece City, AL
US EPA ID No. ALD070513767

Phone: (256) 538-3800
Fax: (256) 538-1836

Contact: Tina Girard – (800) 637-4023

taelishag@gchi.com

Grr!

Giant Resource Recovery - Attalla, Inc.

Mailing Address: 1229 Valley Drive, Attalla, AL 35954
Shipping Address: 1229 Valley Drive, Attalla, AL 35954
Tel.: (256) 538-3800
Fax Office: (256) 538-1836
Fax Lab: (256) 538-2634

WASTE MATERIAL PROFILE FORM

Profile Update: _____ PROFILE NO. _____

A. GENERAL INFORMATION

GENERATOR _____
FACILITY ADDRESS (PO BOX) _____
FACILITY SITE ADDRESS _____
CITY, STATE, ZIP _____
TECHNICAL CONTACT _____
NAME OF WASTE _____
PROCESS GENERATING WASTE _____

TRANSPORTER _____
GENERATOR USEPA ID NO. _____
GENERATOR STATE ID NO. _____
PHONE NO. _____
TITLE _____
SIC CODE _____

B. PHYSICAL CHARACTERISTICS OF WASTE

PHYSICAL STATE @ 70 F: ___Liquid ___Semi-Solid ___Solid
ODOR: ___None ___Mild ___Strong Describe _____
FLASH POINT: ___<100 F ___101-139 F ___140-200 F ___>200 F ___No Flash Value _____
BTU RANGE: _____/lb _____/gal
SPECIFIC GRAVITY: ___<0.8 ___>.8<1 ___>1 EXACT _____
SOLIDS RANGE: _____ %

LAYERS: ___Single-Phase ___Bi-layer ___Multilayer
COLOR: _____ _____
pH RANGE: ___>2-5 ___>5-9 ___> 9 - < 12.5
UNBURNABLE RESIDUE RANGE: _____ %
WATER CONTENT RANGE: _____ % Dissolved _____ % Free Layer
VISCOSITY RANGE: _____ Centipoises

C. CHEMICAL COMPOSITION

	RANGE
_____	_____ %
_____	_____ %
_____	_____ %
_____	_____ %
_____	_____ %
_____	_____ %
_____	_____ %
_____	_____ %
_____	_____ %
_____	_____ %
_____	_____ %
_____	_____ %

D. METALS ___NONE ___TOTAL (ppm) ___TCLP (ppm)

ANTIMONY (SB)	>	10.0	___No ___Yes	CONC. RANGE	___
ARSENIC (AS)	>	5.0	___No ___Yes	CONC. RANGE	___
BARIUM (BA)	>	100.0	___No ___Yes	CONC. RANGE	___
BERYLLIUM (BE)	>	1.0	___No ___Yes	CONC. RANGE	___
CADMIUM (CD)	>	1.0	___No ___Yes	CONC. RANGE	___
CHROMIUM (CR)	>	5.0	___No ___Yes	CONC. RANGE	___
LEAD (PB)	>	5.0	___No ___Yes	CONC. RANGE	___
MERCURY (HG)	>	0.2	___No ___Yes	CONC. RANGE	___
NICKEL (NI)	>	5.0	___No ___Yes	CONC. RANGE	___
SELENIUM (SE)	>	1.0	___No ___Yes	CONC. RANGE	___
SILVER (AG)	>	5.0	___No ___Yes	CONC. RANGE	___
THALLIUM (TL)	>	10.0	___No ___Yes	CONC. RANGE	___

E. OTHER COMPONENTS - ___PPM ___%

SULFUR _____ PCB'S _____ HALOGENS _____
PESTICIDES/HERBICIDES _____

F. HAZARDOUS CHARACTERISTICS

REACTIVITY _____None ___Water Reactive _____Shock Sensitive
_____Pyrophoric ___Explosive ___Sulfides: _____
_____Cyanides: _____ ___Other: _____
OTHER HAZARDOUS CHARACTERISTICS: ___Ignitable
_____Corrosive ___TCLP Wastes ___Other: _____
USEPA HAZARDOUS WASTE? _____Yes ____No
USEPA HAZARDOUS WASTE CODE(S): _____ _____

STATE HAZARDOUS WASTE? _____Yes ____No
STATE HAZARDOUS WASTE CODE(S): _____

G. SHIPPING INFORMATION

DOT HAZARDOUS MATERIAL? _____ Yes ____No
PROPER SHIPPING NAME: _____
HAZARD CLASS: _____ ID NO. _____
PACKAGING GROUP: _____ EMERGENCY RESPONSE GUIDE: ____
PRIMARY CONSTITUENTS CONTRIBUTING TO HAZARD: _____
24 HR. EMERGENCY PHONE NO. _____
METHOD OF SHIPMENT _____ Bulk _____ Drums [Type/Size] _____
ESTIMATED VOLUME: _____ Gal/Drums/Tons per _____

H. SPECIAL HANDLING OR INCOMPATIBILITIES

_____

IS THIS WASTE SUBJECT TO BENZENE WASTE NESHAP? _____Yes _____No _____Additional Pages Attached

GENERATOR CERTIFICATION

I hereby certify that all information in this and all attached documents is true and accurate, and that all known or suspected hazards have been disclosed. I certify that there are no hazardous constituents or characteristics except as described above, and if the waste stream or process generating the waste changes, I will notify GRR prior to shipment of the waste.

_____ Signature
_____ Title
_____ Printed/Typed Name
_____ Date

PROFILE NO. _____

Giant Resource Recovery - Attalla, Inc.

TC RULE CERTIFICATION FORM

Generator Name: _____ EPA ID NO.: _____

Location: _____

Waste Description: _____

CHARACTERISTICS OF HAZARDOUS WASTE: Indicate if this waste contains any of the following characteristics based on criteria mandated by 40 CFR 261.21, 261.22, 261.23, 261.24

			Regulatory Threshold Level	Check One Yes	Check One No	Check One Scientific Data	Check One Generators' Knowledge	Actual Value
D001	Characteristic of Ignitability	<	140 F	____	____	_____	_____	_____ F
D002	Characteristic of Corrosivity	≤ ≥	2 or 12.5	____	____	_____	_____	_____ pH
D003	Characteristic of Reactivity			____	____	_____	_____	_____

	Constituent	Regulatory Threshold Level, ppm	Check One Yes	Check One No	Check One Scientific Data	Check One Generators' Knowledge	Actual Value ppm
D004	Arsenic	5.0	____	____	_____	_____	_____
D005	Barium	100.0	____	____	_____	_____	_____
D006	Cadmium	1.0	____	____	_____	_____	_____
D007	Chromium	5.0	____	____	_____	_____	_____
D008	Lead	5.0	____	____	_____	_____	_____
D009	Mercury	0.2	____	____	_____	_____	_____
D010	Selenium	1.0	____	____	_____	_____	_____
D011	Silver	5.0	____	____	_____	_____	_____
D012	Endrin	0.02	____	____	_____	_____	_____
D013	Lindane	0.4	____	____	_____	_____	_____
D014	Methoxychlor	10.0	____	____	_____	_____	_____
D015	Toxaphene	0.5	____	____	_____	_____	_____
D016	2, 4-D (2,4-Dichloro-phenoxyacetic acid)	10.0	____	____	_____	_____	_____
D017	2,4, 5-TP (Silvex)	1.0	____	____	_____	_____	_____
D018	Benzene	0.5	____	____	_____	_____	_____
D019	Carbon Tetrachloride	0.5	____	____	_____	_____	_____
D020	Chlordane	0.03	____	____	_____	_____	_____
D021	Chlorobenzene	100.0	____	____	_____	_____	_____
D022	Chloroform	6.0	____	____	_____	_____	_____
D023	o-Cresol	200.0	____	____	_____	_____	_____
D024	m-Cresol	200.0	____	____	_____	_____	_____
D025	p-Cresol	200.0	____	____	_____	_____	_____

--Continued--

PROFILE NO. _____

	Constituent	*Regulatory Threshold Level, ppm	Check One Yes	Check One No	Check One Scientific Data	Check One Generators' Knowledge	Actual Value ppm
D026	Cresol	200.0					
D027	1,4 Dichlorobenzene	7.5					
D028	1,2 Dichloroethane	0.5					
D029	1,1 Dichloroethylene	0.7					
D030	2,4 Dinitrotoluene	0.13					
D031	Heptachlor (and its hydroxide)	0.008					
D032	Hexachlorobenzene	0.13					
D033	Hexachlorobutadiene	0.5					
D034	Hexachloroethane	3.0					
D035	Methyl Ethyl Ketone	200.0					
D036	Nitrobenzene	2.0					
D037	Pentachlorophenol	100.0					
D038	Pyridine	5.0					
D039	Tetrachloroethylene	0.7					
D040	Trichloroethylene	0.5					
D041	2,4,5-Trichlorophenol	400.0					
D042	2,4,6-Trichlorophenol	2.0					
D043	Vinyl Chloride	0.2					

As defined by the TCLP (Method 1311), EP Toxicity is no longer acceptable

Listed Hazardous Waste: Indicate if this waste also contains any listed hazardous wastes coded in 40 CFR 261.31, 261.32 and 261.33 by including the appropriate EPA hazardous waste code(s).

_____ _____ _____ _____ _____ _____

_____ _____ _____ _____ _____ _____

GENERATOR CERTIFICATION:

I hereby certify that all information submitted on this form and all attached documents are true and accurate. In the event this form is not fully completed, I authorize Giant Resource Recovery-Attalla Inc. to conduct necessary testing at my expense to properly complete the form.

Signature: _____ Date: _____

Print Name: _____ Title: _____

THIS CERTIFICATION/RECERTIFICATION IS REQUIRED FOR EACH PROFILE

ORIGINAL SIGNATURE REQUIRED

GIANT RESOURCE RECOVERY
BENZENE NESHAP QUESTIONNAIRE

Generator: _____ Profile No.:_____

Description of Waste: _____

1. Is the waste generated by any of the following types of industries?

   A. Petroleum Refineries (SIC 2911)
   B. Chemical Manufacturing Plants (SIC 2800-2899)
   C. Coke By-Product Recovery Plants (SIC 3312)
   D. Treatment, Storage and Disposal Facilities handling benzene wastes from A, B, or C above (SIC 4953, 4959, 9511, 4214)

   Yes ___ Which SIC Code? _____ No ____

2. Does the current Waste Profile indicate the presence of benzene in this waste or is the waste described by one or more of the following waste codes: D018, F005, U019, F024, F037, F038, K085, K104, K105, and K141-K147?

   Yes ___ (Circle waste code) No ____

3. Will any shipments of this waste contain greater than 10% water?

   Yes ___ No ____

4. What is the benzene concentration range in this waste?

   Minimum value: _____ Maximum Value: _____ ppm or % (Circle One)

   Note that the maximum value should represent the maximum possible benzene concentration in any shipment.

5. If you answered yes to item 1 and 2 above, what is your facility's Total Annual Benzene (TAB) in mega-grams (10^6 grams) per year?

   ___ Mg/yr

6. Is this waste subject to the Benzene Waste Operations NESHAP control requirements (per 40 CFR 61.342(b))?

   Yes ___ No ____

GENERATOR CERTIFICATION:
I hereby certify that all information submitted in this document is true, accurate and complete to the best of my knowledge and belief. In addition, I also certify that the upper range benzene concentration provided in response to question 4 above represents the maximum potential benzene concentration in any shipment of this waste stream that will be sent to GRR.

Signature: _____ Title: _____

Print Name: _____ Date: _____

SECTION 3
Waste Characteristics & Waste Analysis Plan

Section 3.1 describes the chemical and physical analyses as well as the hazardous characteristics of the wastes stored, blended, and processed at Giant Resource Recovery-Attalla, Inc. (herein, GRR). Section 3.2 presents the Waste Analysis Plan (WAP) for sampling, testing and evaluating wastes received and processed at the facility. The WAP is designed to gather sufficient information about the waste to assure its safe handling and processing.

3.1 Chemical and Physical Analysis

3.1.1 General Description of Waste

GRR processes industrial wastes including but not limited to the following: paints; lacquers; thinners; waste petroleum products; aerosol products; petroleum by-products; inks; resins; adhesives; petroleum distillates; wastes solvents (halogenated and non-halogenated); organic chemicals and by-products and various alcohols; and, waste contaminated materials and residues from its waste storage, blending, and processing facility. Waste materials may be delivered to the facility in bulk tanker trucks, rail cars, and containers and either processed, blended, and/or stored in drums or tanks on-site or processed and shipped off-site to an approved facility.

Most, but not all, of the wastes handled at the GRR facility are wastes designated as characteristic or listed as hazardous by U.S. Environmental Protection Agency (EPA) and the State of Alabama. Most are ignitable and some are designated as toxic. However, GRR also occasionally receives used oil and other non-hazardous material.

3.1.2 Hazardous Characteristics

Hazardous wastes listed by the EPA under its regulations at 40 CFR § 261 (ADEM Rule 335-14-2) and wastes exhibiting hazardous characteristics also described in those regulations may be accepted at GRR depending on their suitability for the facility's operations and compatibility with materials with which they will be stored, blended and/or processed. The wastes accepted by GRR are listed in the Part A Application in Section 1 of this submittal and are identified by EPA Hazardous Waste Codes and the associated hazard.

Waste exhibiting the characteristic of reactivity (D003) is not accepted. However, some wastes carry the waste code D003 due to the fact that they are aerosol containers; aerosol containers with the waste code D003 are acceptable. These D003 aerosol wastes are only acceptable provided that the generator certifies that the waste code was applied to the waste only because it is an aerosol container and not because the aerosol contents (e.g. – liquid contents) themselves exhibit the characteristic of reactivity at ADEM Rule 335-14-2-.03.

Wastes exhibiting the characteristics of Corrosivity (D002), listed dioxin and furan wastes (F020 – F023 and F026 – F027), and PCB wastes above the regulatory levels established under the Toxic Substance Control Act are not accepted for processing or fuel blending purposes. However, these wastes may be accepted for temporary storage and transfer from GRR to a permitted disposal facility. These wastes will not be placed in the facility's storage tanks.

3.1.3 Basis for Hazard Designation

The typical components of hazardous waste used at GRR are spent solvents or other industrial wastes which are characteristic or listed wastes because of ignitability and/or toxicity. These wastes often are further described by one or more toxicity characteristics. Many industrial wastes and waste petroleum products may contain significant heat value (Btu's) but are not listed wastes for ignitability. Such wastes may contain sufficient concentrations of certain metals or organic components to exhibit the characteristic of toxicity. GRR may accept for storage, blending and processing any of these wastes. The determination of whether a waste is suitable for GRR's use is generally more dependent on the physical and chemical characteristics of the waste.

GRR may also receive wastes in the form of aerosol cans and other containers. The majority of the aerosol containers to be received at the facility are regulated and classified as an ignitable (or flammable) compressed gas as defined in 40 CFR § 261.21 and 49 CFR § 173.300. Non-flammable aerosol containers are also accepted at the facility (e.g., cans w/compressed air, nitrogen).

3.1.4 Laboratory Documentation

New waste streams undergo pre-qualification review as detailed in Section 3.2.1.1. Analytical data, if required, may be provided by the generator or by GRR. Other laboratories may also be used as necessary.

Samples of all wastes delivered to the GRR facility are analyzed per Section 3.2.1.2 and Section 3.2.1.3, and shipping papers and/or manifests are reviewed before processing the material at the facility. Any problems of waste identification and composition are resolved with the generator or the waste is not accepted into the facility. Analyses of samples from incoming shipments are generally performed at the laboratory on-site. Other laboratories may also be used as necessary.

3.2 Waste Analysis Plan

The Waste Analysis Plan sets out the criteria, rationale, and procedures that will be followed at GRR for the sampling, analysis, and evaluation of wastes received, stored in tanks, blended, and/or processed at the facility. It outlines the procedures and analytical methods used to obtain the

chemical and physical characteristics of the wastes in order to evaluate them for safe storage and handling by the facility.

3.2.1 Waste Qualification Protocol Including Parameters and Rationale.

It is GRR's policy not to process any waste until the analytical results (except for aerosol wastes, See Section 3.2.1.5) are obtained and any discrepancies resolved.

3.2.1.1 Pre-qualification Procedures and Analysis

GRR requires a written waste profile of the waste material from the generator prior to the waste being shipped to the facility. The Waste Profile Sheet, shown as Figure 3-1, is to be reviewed biennially or whenever the waste stream changes. Additionally, a Toxicity Characteristic Certification form, shown in Figure 3-2, may be required. This prequalification procedure is designed to assure that a comprehensive chemical profile is provided for each waste including, e.g., volatile and semi-volatile chemicals, metals, pesticides, herbicides and poly-aromatic hydrocarbons which can be shown in Figure 3-1. The information for Figure 3-1 can be based on generator knowledge, generator certification, or testing. Based on the information contained on the Profile Sheet, GRR will determine whether the waste can be managed on site. Please note that non-substantive changes to these example documents may be made so long as all required information is contained in the documents.

For aerosol containers, as part of the prequalification review process, waste streams containing HFC propellants will be specifically identified. Aerosols containing HFC propellants will be submitted on a profile that is independent from aerosol containers whose constituent gases may be used as a fuel. Requiring HFC propellants on independent profiles will ensure proper management of these propellants upon receipt. See Figure 3-3 for an example of the aerosols profile.

As a part of this pre-qualification procedure, representative samples of each waste stream are either obtained from the generator or from the first shipment of material at the facility. These are required to be analyzed and the results are compared to the waste profile.

The following pre-qualification analyses will be performed as shown in Table 3-1 and discussed below:

Table 3-1: Pre-Qualification Analysis*

Analysis	Notes
BTU Value	This analysis will be performed only on material to be blended into fuel for reuse.
Ash Content	This analysis will be performed only on material to be blended into fuel for reuse.
Chlorides	This analysis will be performed only on material to be blended into fuel for reuse.
pH	This analysis will not be performed on solvent matrix materials, e.g., organic solvent wastes or oil wastes, or water insoluble solid matrix wastes
Moisture content	This analysis will be performed only on liquid materials.
Specific Gravity	This analysis will be performed only on liquid materials.
Compatibility	This analysis will be performed only on liquid materials.
GC Scan (PCBs)	This analysis will be performed only on liquid materials.
Radioactivity	None
Pesticides	The facility may use generator knowledge in lieu of testing.

* For aerosol containers, the above analyses are performed on the liquid/solid contents of the container. Detailed information concerning the propellant gases listed on the profile may be obtained from MSDSs for each propellant.

The criteria used for identifying discrepancies will include 1) differences in physical state; 2) materials or compounds present which were not listed on the manifest or waste profile; and 3) materials or compounds present but outside the expected range.

If discrepancies are noted, GRR will contact the generator and describe the discrepancy. The generator is allowed to revise the profile. If the profile is revised, the generator may fax or email the corrected document(s).

3.2.1.2 In-coming Bulk Shipment Procedures and Analysis

In addition to the pre-qualification procedures, representative samples from the waste shipment are analyzed upon arrival at GRR (fingerprint testing) and the results are compared to the waste profile.

The following fingerprint analysis will be performed on incoming bulk shipments as shown in Table 3-2 and discussed below:

Table 3-2: In-coming Bulk Shipment Analysis

Analysis	Notes
BTU Value	This analysis will be performed only on material to be blended into fuel for reuse.
Ash Content	This analysis will be performed only on material to be blended into fuel for reuse.
Chlorides	This analysis will be performed only on material to be blended into fuel for reuse.
pH	This analysis will not be performed on solvent matrix materials, e.g., organic solvent wastes or oil wastes, or water insoluble solid matrix wastes
Moisture content	This analysis will be performed only on liquid materials.
Specific Gravity	This analysis will be performed only on liquid materials.
Compatibility	This analysis will be performed only on material to be blended into fuel for reuse.
PCBs	This analysis will be performed only on material to be blended into fuel for reuse.
Radioactivity	None

If discrepancies are noted GRR will contact the generator within 24 hours and describe the discrepancy. Discrepancies will be resolved within 15 days after receiving the waste (40 CFR § 264.72(c)), allowing the generator to 1) revise the profile; 2) correct the manifest; or 3) make arrangements to remove the waste. If revisions are necessary, the generator may fax or email the corrected document(s)

Flammable solvents and other wastes bulked, blended or processed for shipment off-site may receive additional analysis in accordance with requirements of the receiving facility.

3.2.1.3 In-Coming Container Shipment Procedures and Analysis

In addition to the pre-qualification procedures, representative samples from in-coming container shipments are analyzed upon arrival at GRR and the results are compared to the waste profile.

Aerosol wastes in containers do not require incoming shipment sampling and testing (fingerprint analysis) prior to processing the aerosol wastes in a Kruncher™ unit due to the potential difficulty of sampling and analysis of the aerosol waste streams, the facility preacceptance procedures, and the design and operation of the Kruncher units (inerting and fire and safety systems). Shipments of aerosol containers will be inspected upon unloading to verify that the contents of the shipment match the waste material profile. Then, sampling of each shipment can occur one of two ways:

1) The liquid waste stream separated by the Kruncher unit is sampled and tested by the incoming waste shipment verification procedures and waste compatibility testing prior to mixing with other wastes in the tank storage system. A fingerprint sample (liquid/semi-solid waste) from each shipment of aerosol waste is collected from a sampling port associated with the Kruncher unit.

2) An aerosol can emptying device can be used to puncture the can and collect a sample of the liquid/semi-solid component. This is done prior to the introduction of the aerosol cans to the Kruncher.

The following fingerprint analysis will be performed as shown in table 3-3 and discussed below:

Table 3-3: In-Coming Container Shipment Analysis*

Analysis	Notes
BTU Value	This analysis will be performed only on material to be blended into fuel for reuse.
Ash Content	This analysis will be performed only on material to be blended into fuel for reuse.
Chlorides	This analysis will be performed only on material to be blended into fuel for reuse.
pH	This analysis will not be performed on solvent matrix materials, e.g., organic solvent wastes or oil wastes, or water insoluble solid matrix wastes
Moisture content	This analysis will be performed only on liquid materials.
Specific Gravity	This analysis will be performed only on liquid materials.
Compatibility	This analysis will be performed only on material to be blended into fuel for reuse.
PCBs	This analysis will be performed only on material to be blended into fuel for reuse.
Radioactivity	None

* For aerosol containers, the above analyses are performed on the liquid/solid contents of the container. Detailed information concerning the propellant gases listed on the profile may be obtained from MSDSs for each propellant.

Trucks carrying containers will proceed to the container unloading dock where plant personnel will visually inspect the load, confirm the number of containers, and, on the basis of the documentation and waste identification number, give permission for the load to be unloaded onto the container dock area. During the unloading process, all containers will be inspected and any container not considered to be in a satisfactory condition will be placed in an overpack drum or other suitable container or designated for immediate processing. Each consignment of containers will be kept separate until approved. When the truck is unloaded, and the manifest signed, the truck may leave the plant.

Containers being unloaded may be placed on the dock or in storage for sampling and verification by fingerprint testing. If it is found that the truckload or a group of containers within a truckload need to be placed in storage for a time before processing, then these containers may be placed in the storage area for up to 24 hours prior to sampling. Containers which have been sampled will be specially marked or place in a designated area in such a manner so as to be readily apparent to plant personnel.

For sampling, GRR shall sample a minimum of 10% of the shipping containers in a shipment. A composite sample, taken in accordance with the procedure described in Section 3.2.4, will be prepared. The samples will be taken to the laboratory for analysis.

The containers will be moved by fork lift to be placed in storage or processed.

If a container or group of containers does not conform to the profile sheet and upon review it is determined that the waste is unsuitable for processing, then the containers will be removed from storage and placed into a reject container area.

If discrepancies are noted GRR will contact the generator within 24 hours and describe the discrepancy. The generator is allowed 24 hours to 1) revise the profile, 2) correct the manifest, or 3) make arrangements to remove the waste. If revisions are necessary, the generator may fax or email the corrected document(s).

3.2.1.4 Solid Fuel Bulk Repackaging:

Waste acceptance procedures will conform to the procedures outlines in Section 3.2.1.3 for the processing of containerized wastes with the following addition:

In addition to the procedures outlined in Section 3.2.1.3, all waste materials that are to be accepted for solid waste repackaging will be analyzed for compatibility with the wood by-product material used to alter the consistency of the waste material. To perform this analysis, the representative sample obtained as outlined in Section 3.2.1.3 of the permit will be combined with the wood by-product material in a sample jar (or equivalent) in the laboratory. The waste material will then be thoroughly mixed for a period of two minutes and the temperature of the mixed material will be monitored for a period of 5 minutes to determine if the waste material will react with the wood by-product. Once all required waste acceptance procedures outlined in Section 3.2.1.3 and the compatibility analysis outlined above are completed, the waste material may be accepted for repackaging.

3.2.1.5 In-Coming Kruncher Material Shipment Procedures and Analysis:

In addition to the pre-qualification procedures, representative samples from in-coming

Kruncher material shipments are analyzed upon arrival at GRR and the results are compared to the waste profile.

GRR will follow the incoming shipment procedures detailed in Section 3.2.1.3 of this WAP for aerosol containers destined for processing in the Kruncher unit(s), except that shipment acceptance fingerprint testing will only be performed on the liquid/solid contents of the containers. The propellant gases used in aerosol cans consist mainly of propellants such as propane, butane, and isobutane. Aerosol containers that include HFC propellants will be received and processed independently from fuel related propellant gases. Detailed information on the propellants listed on the waste material profiles may be obtained from MSDSs for these propellants.

3.2.2 Parameters to be Analyzed

A general discussion of the parameters to be analyzed follows:

During the initial waste prequalification procedure described previously, a test is performed on each waste as detailed in Section 3.2.1.1.

This initial test is performed either on a sample obtained from the generator or on the sample obtained from the initial shipment of the waste material and is intended to (a) check that the waste material corresponds to its description in the Waste Profile Sheet; (b) check for properties which may create worker safety or compliance problems; and (c) check those constituents that have significant influence on the heat value of the waste or the difficulty or cost of processing.

A more streamlined testing is performed on each subsequent shipment of material accepted at the facility in accordance with the procedures detailed in Section 3.2.1.2 and 3.2.1.3.

It is essential that the initial pre-qualification and incoming shipment testing be both brief and reliable. The tests must be brief in order to prevent the formation of a line of vehicles awaiting acceptance, and sufficiently reliable to prevent the inadvertent acceptance of wastes not conforming to the manifest or contractual description. Thus, the least number of parameters that can be analyzed quickly and which together will confirm the identity of the received waste shipment have been chosen for analysis.

A lists of key parameters from which the pre-qualification and incoming shipment testing parameters may be chosen is discussed below.

pH.
pH is an important indicator since unwanted reactions may occur when wastes of widely different pHs are mixed. GRR does not accept corrosive waste for processing or fuel

blending, nor does GRR accept reactive waste for any purpose[1]. pH is performed as both part of the pre-qualification and incoming shipment acceptance testing.

Specific Gravity.
Specific gravity is a basic indicator of waste characteristics and is used to ensure that a waste shipment matches the waste profile. Specific gravity is performed as both part of the pre-qualification and incoming shipment acceptance testing.

Ash/Btu/Chlorides/Moisture Content
These help determine the waste's suitability as a fuel. These parameters are performed as both part of the pre-qualification and incoming shipment acceptance testing.

Radioactivity
GRR is not authorized to accept radioactive wastes, thus, each shipment will be scanned for radiation.

GC Scan (PCB's)
The facility will not process wastes with a PCB content greater than 50 ppm. Thus, it is important to sample and analyze for PCB content. However, these wastes may be accepted for temporary storage and transfer from GRR. PCBs are analyzed as both part of the pre-qualification and incoming shipment acceptance testing.

Pesticides/Herbicides
The general procedure to be followed by GRR is that the Profile Sheet be used as the basis for a certification by the generator concerning whether the waste stream contains pesticides/herbicides. GRR may accept approved pesticides or herbicides for blending.

Compatibility
A compatibility test is conducted for all liquid and solid waste received at the GRR facility for storage, blending or processing. A sample from each load received is tested to determine if the material reacts with other materials already in the system.

For liquids, a container is partially filled with a sample of representative material from a storage tank. A sample from the load being received is then added to the container and capped. The mixture is shaken and observed to determine if the samples react chemically.

For solids, material to be processed in the solids auger system will be tested for compatibility with the wood by-product material used in the process in accordance with Section 3.2.1.4.

[1] GRR may accept D003 aerosol containers provided that the generator certifies that the waste code was applied to the waste only because the waste is an aerosol container and not because the aerosol contents themselves (e.g.- liquids) exhibit the characteristic of reactivity at ADEM Rule 335-14-2-.03.

Failure of the compatibility test does not necessarily imply that the waste is out of specification. Different solvent matrices may be tested, which do not result in a reaction that will interfere with processing or result in conditions that may be unsafe. In this instance, the material will be accepted. If a waste is found to be incompatible the decision will be made to either (1) reject the waste, (2) accept the waste and retest it using a different solvent matrix that will not result in a reaction that will interfere with processing or result in conditions that may be unsafe, or (3) ship it off-site to a permitted facility that could handle this material.

3.2.3 Test Methods

Table 3-1 lists the test methods utilized to measure each parameter at the GRR laboratory. Because of the varied nature of the waste materials, it may be desirable or necessary to modify or adapt the standard methods or the sample preparation used prior to analysis, or to use entirely alternative methods. Such modifications are permissible under this plan, provided that the modified or alternative procedure produces accurate and reliable results. However, test methods normally conform to SW-846 methods or other acceptable methods.

We have no plans to further modify these test methods at this time. However, it should be remembered that this permit is for a 10 year period and many changes in methods and technology could occur within this length of time. We feel that it is reasonable and prudent to include a provision in the permit allowing modified test methods to be used so long as the modified methods are accurate and reliable.

Initial testing for qualifying a new waste stream is generally performed by GRR. Alternative laboratories may also be used. Analysis of samples collected from incoming trucks or rail cars for acceptance at GRR are generally performed in the laboratory at the facility. If the facility is unable to analyze a sample in a timely manner, an alternative laboratory will be utilized.

TABLE 3-4
TEST METHODS FOR ANALYSIS[1]

Parameters	Test Methods	Reference
Specific Gravity	Standard Hydrometer	ASTM
pH	pH Measurement or Litmus Paper	USEPA SW-846, Method 9040, 9041, 9045
Heat of Combustion and Ash Residue	Bomb Calorimeter	ASTM D-240
Moisture Content	Karl Fisher	ASTM D-2361; D-805; E-203
Halogen/Chloride	Silver Nitrate	ASTM D-808 and 512B
GC Scan - Polychlorinated Biphenyls	Gas Chromatography	Test Method for Evaluating Solid Waste (EPA SW-846 8080)
Radioactivity	Meter with Geiger Probe	

[1] The above methods may be modified provided the modified method is sufficiently accurate and reliable for waste acceptance procedures. The use of alternate test methods may be desirable or necessary.

3.2.4 Sampling Methods

3.2.4.1 Bulk Shipments

Sampling of truck tanker trailers and rail car bulk shipments is accomplished using the Coliwasa sampler and method.

3.2.4.2 Containers (Drums)

Samples from drums, e.g., 55 gallon drums and smaller containers, are taken with a tube or pipe similar to a Coliwasa sampler. The pipe is made of non-sparking material such as copper or plastic and has an inside diameter of about ½" to ⅝". This provides a much sturdier tool for sampling and has proven to be an adequate sampling device even under adverse sampling conditions.

3.2.4.3 Storage Tanks

Storage tanks may be sampled by different methods. Samples are typically collected from a tap located on the solvent tanks recirculation line. The tanks are agitated and solvents are re-circulated for a period of approximately 30 minutes. A Coliwasa sampler may be used if practical. Also, a grab sample may be taken from a recirculating line.

3.2.4.4 Solids

Solids that are non-penetrable may be sampled with an auger, by chipping, by scraping, or by tearing or breaking off a piece.

3.2.4.5 Aerosol Can Containers:

Shipping containers containing aerosol containers to be processed in the Kruncher unit shall be sampled on the same frequency as detailed in Section 3.2.1.3. A representative number of individual cans may be manually selected from each bulk container and a portion of the liquid/solid contents will be used to form a composite sample for each shipment. Again, no samples of the propellant gases for aerosol cans will be obtained. As an alternative to forming a composite sample from a representative group of individual cans, samples may be collected from the Kruncher itself after the containers have been processed and prior to placing any liquid or solids wastes in storage. However, all wastes processed in the Kruncher™ unit are screened for waste compatibility prior to mixing and processing with other wastes. Collecting samples in this manner will minimize worker exposure to solvents and ensure that a representative sample of each shipment is obtained. Any waste not matching the profile or manifest will be identified as part of shipment receipt inspection procedures.

3.2.5 Frequency of Analysis

Two levels of testing are involved for acceptance of hazardous waste: (1) pre-qualification of all waste streams, and (2) sampling and testing prior to acceptance for storage, blending, or processing. All new waste streams are pre-qualified. Waste streams in current use are reviewed biennially, at which time suppliers are required to provide re-certification of their waste profile.

Each incoming shipment of bulk waste is sampled to verify the identity of the waste. Containers are sampled according to Sections 3.2.1.3 and 3.2.4 of this Waste Analysis Plan. Composite samples will be taken only from containers containing similar materials. At a minimum, 10% of the drums in a container shipment will be sampled, these samples will be used to form a composite and fingerprint determination will be made on the composite sample. Any wastes containers that do not match the profile or manifest will be identified as part of the initial receipt inspection process.

3.3 Additional Waste Analysis Requirements Pertaining to Land Disposal Restrictions

GRR does not treat or dispose of any hazardous waste in land disposal units at the facility. Wastes are stored in tanks or containers, or blended or processed in tanks or containers for off-site shipment to approved facilities.

Should any waste be generated at the facility requiring shipment off-site, knowledge of the waste generated or sufficient chemical testing will allow GRR to make proper notification of any land disposal restrictions to the receiving facility. The applicable testing, tracking and recordkeeping requirements pertaining to the Land Disposal Restrictions in 40 CFR § 268.7 will be followed for applicable offsite shipments.

Figure 3-1
Waste Material Profile Form (Example)

A. GENERAL INFORMATION

GENERATOR _____ TRANSPORTER _____
FACILITY ADDRESS _____ GENERATOR USEPA ID NO. _____
_____ GENERATOR STATE ID NO. _____
_____ PHONE NO. _____
TECHNICAL CONTACT _____ TITLE _____
NAME OF WASTE _____ SIC CODE _____
PROCESS GENERATING WASTE _____

B. PHYSICAL CHARACTERISTICS OF WASTE

PHYSICAL STATE @ 70°F: ____Liquid ____Semi-Solid ____Solid
ODOR: ____None ____Mild ____Strong Describe _____
FLASH POINT: ____<100°F ____101°F-139°F ____140°F-200°F
____>200°F ____No Flash Value _____
BTU RANGE: _____/gal.
SOLIDS RANGE: _____%

LAYERS: ____Single-Phased ____Bi-layered ____Multilayered
COLOR: _____
pH RANGE: ____>2-5 ____>5.9 ____>9-<12.5
UNBURNABLE RESIDUE RANGE: _____%Dissolved
WATER CONTENT RANGE: _____% Free Layer
VISCOSITY RANGE: _____.Centipoises

C. CHEMICAL COMPOSITION RANGE

_____ ____%
_____ ____%
_____ ____%
_____ ____%
_____ ____%
_____ ____%
_____ ____%
_____ ____%
_____ ____%
_____ ____%
_____ ____%

D. METALS ____ TOTAL (ppm) ____ TCLP (ppm)

ANTIMONY (SB)	> 10.0	___ No ___ Yes	CONC. RANGE	____
ARSENIC (AS)	> 5.0	___ No ___ Yes	CONC. RANGE	____
BARIUM (BA)	> 100.0	___ No ___ Yes	CONC. RANGE	____
BERYLLIUM (BE)	> 1.0	___ No ___ Yes	CONC. RANGE	____
CADMIUM (CD)	> 1.0	___ No ___ Yes	CONC. RANGE	____
CHROMIUM (CR)	> 5.0	___ No ___ Yes	CONC. RANGE	____
LEAD (PB)	> 5.0	___ No ___ Yes	CONC. RANGE	____
MERCURY (HG)	> 0.2	___ No ___ Yes	CONC. RANGE	____
NICKEL (NI)	> 5.0	___ No ___ Yes	CONC. RANGE	____
SELENIUM (SE)	> 1.0	___ No ___ Yes	CONC. RANGE	____
SILVER (AG)	> 5.0	___ No ___ Yes	CONC. RANGE	____
THALLIUM (TL)	> 10.2	___ No ___ Yes	CONC. RANGE	____

E. OTHER COMPONENTS – TOTAL (ppm)

SULFUR _____ PCB'S _____ HALOGENS _____
PESTICIDES/HERBICIDES _____

F. HAZARDOUS CHARACTERISTICS

REACTIVITY: ____None ____Water Reactive ____Shock Sensitive
____Pyrophoric ____Explosive ____Sulfides: _____
____Cyanides: _____ Other: _____
OTHER HAZARDOUS CHARACTERISTICS: ____Ignitable
____Corrosive ____TCLP Wastes ____Other: _____
USEPA HAZARDOUS WASTE? ____Yes ____No
USEPA HAZARDOUS WASTE CODE(S): _____

STATE HAZARDOUS WASTE? ____YES ____NO
STATE HAZARDOUS WASTE CODE(S) _____

G. SHIPPING INFORMATION

DOT HAZARDOUS MATERIAL? ____Yes ____No
PROPER SHIPPING NAME _____
HAZARD CLASS _____ ID NO. _____
PACKAGING GROUP ____ EMERGENCY RESPONSE GUIDE NO. ____
PRIMARY CONSTITUENTS CONTRIBUTING TO HAZARD:
_____ _____
24 HR. EMERGENCY PHONE NO. _____
METHOD OF SHIPMENT: ____Bulk ____Drums[Type/Size _____]
ESTIMATED VOLUME: _____ Gal/Drums/Tons per _____

H. SPECIAL HANDLING OR INCOMPATIBILITIES

_____

IS THIS WASTE SUBJECT TO BENZENE WASTE NESHAPS? ____Yes ____No _____Additional Pages Attached

GENERATOR CERTIFICATION

I hereby certify that all information in this and all attached documents is true and accurate, and that all known or suspected hazards have been disclosed. I certify that there are no hazardous constituents or characteristics except as described above, and if the waste stream or process generating the waste changes, I will notify GRR prior to shipment of the waste.

Signature _____ Title _____

Typed Name _____ Date _____

Figure 3-1
Waste Material Profile Form (Example)

Generator Name: _____
EPA I.D.# _____

Location: _____

Waste Description: _____

			Regulatory Threshold Level	(Check One) Yes	No	(Check One) Scientific Data	Generator's Knowledge	Actual Value
D001	Characteristic of Ignitability	<	140°F					°F
D002	Characteristic of Corrosivity	≤ ≥	2 or 12.5					pH
D003	Characteristic of Reactivity							

	Constituent	* Regulatory Threshold Level, ppm	(Check One) Yes	No	(Check One) Scientific Data	Generator's Knowledge	Actual Value
D004	(Arsenic)	5.0					
D005	(Barium)	100.0					
D006	(Cadmium)	1.0					
D007	(Chromium)	5.0					
D008	(Lead)	5.0					
D009	(Mercury)	0.2					
D010	(Selenium)	1.0					
D011	(Silver)	5.0					
D012	Endrin	0.02					
D013	Lindane	0.4					
D014	Methoxychlor	10.0					
D015	Toxaphene	0.5					
D016	2,4-D (2, 4-Dichlorophenoxyacetic acid)	10.0					
D017	2,4, 5-TP (Silvex)	1.0					
D018	Benzene	0.5					
D019	Carbon	0.5					
D020	Chlordane	0.03					
D021	Chlorobenzene	100.0					
D022	Chloroform	6.0					
D023	o-Cresol	200.0					
D024	m-Cresol	200.0					
D025	p-Cresol	200.0					
D026	Cresol	200.0					
D027	1, 4-Dichlorobenzene	7.5					

Figure 3-2
TC Rule Certification Form (Example)

D028	1, 2-Dichloroethane	0.5					
D029	1, 1-Dichloroethylene	0.7					
D030	2, 4-Dinitrotoluene	0.13					
D031	Heptachlor (and its hydroxide)	0.008					
D032	Hexachloroben-zene	0.13					
D033	Hexachlorobutadi-ene	0.13					
D034	Hexachloroethane	3.0					
D035	Methyl ethyl ketone	200.0					
D036	Nitrobenzene	2.0					
D037	Pentachlorophenol	100.0					
D038	Pyridine	5.0					
D039	Tetrachlorethylene	0.7					
D040	Trichlorethylene	0.5					
D041	2, 4, 5-Trichlorophenol	400.0					
D042	2,4, 6-Trichlorophenol	2.0					
D043	Vinyl Chloride	0.2					

* As defined by the TCLP (Method 1311), EP Toxicity is no longer acceptable.

"LISTED" Hazardous Wastes: Indicate if this waste also contains any listed hazardous wastes coded in 40 CFR 261.31, 261.32 and 261.33 by including the appropriate EPA hazardous waste code (s)

Figure 3-2
TC Rule Certification Form (Example)

GENERATOR CERTIFICATION:

I hereby certify that all information submitted on this form and all attached documents are true and accurate. In the event that this form is not fully completed. I authorize GRR Attalla, Inc. to conduct necessary testing at my expense to properly complete this form.

Signature: _____ Date: _____

Signature: _____ Date: _____

THIS CERTIFICATION IS REQUIRED FOR EACH PROFILE.

ORIGINAL SIGNATURE REQUIRED

Figure 3-3
Aerosol Waste Profile Form (Example)

Grr!
GRR Aerosols-Attalla

WASTE PROFILE

Profile No. _____

Mailing Address:
1229 Valley Drive
Attalla, AL 35954

Shipping Address:
1229 Valley Drive
Attalla, AL 35954

Phone: (256) 538-3800
Fax Office: (256) 538-1836
Fax Lab: (256) 538-2634

A. GENERAL INFORMATION

Generator_____
Generator USEPA ID No._____
Facility Address_____
_____
Generator Phone_____
Generator Fax_____
Technical Contact/Title_____
Name of Waste_____
Process Generating Waste_____

Bill to_____
Billing Address_____
_____
Billing Phone_____
Billing Fax_____
Billing Contact_____
SIC Code:_____

B. PHYSICAL CHARACTERISTICS OF WASTE

Physical State @ 70°F: ___ Liquid ___Semi-Solid ___Solid
Odor: ____None ___Mild ___Strong Describe_____
Flash Point: ____<100°F ____101°F-139°F ____140°F-200°F
____>200°F ____No Flash Value_____
Btu Range: _____per Lb. _____per Gal.
Specific Gravity: __<.8 __.8-1.0 ___>1.0 Exact_____
Solids Range: _____%

Layers: ___Single-Phased __Bi-Layered ___Multi-Layered
Color._____
pH Range: _____>2-5 ____>5-9 _____>9<12
Unburnable Residue Range:_____%
Water Content Range: _____% Dissolved
_____% Free Layer
Viscosity Range: _____Centipoises

C. CHEMICAL COMPOSITION — **RANGE**

_____ _____%
_____ _____%
_____ _____%
_____ _____%
_____ _____%
_____ _____%
_____ _____%
_____ _____%
_____ _____%
_____ _____%
_____ _____%

E. OTHER COMPONENTS – TOTAL (ppm)

Sulfur_____PCB's_____Halogens_____
Zinc Compounds_____
Pesticide/Herbicides_____

F. HAZARDOUS CHARACTERISTICS

Reactivity: __None __Water Reactive __Shock Sensitive
__Pyrophoric __Explosive ____Sulfides: _____
__Cyanides:_____ _____Other: _____
Other Hazardous Characteristics: _____Ignitable
___Corrosive ___TCLP Waste ____Other: _____
USEPA Hazardous Waste?_____Yes _____No
USEPA Hazardous Waste Code(s):_____
_____
State Hazardous Waste?_____Yes _____No
State Hazardous Waste Code(s): _____

D. METALS_____TOTAL (ppm)_____TCLP (ppm)

Antimony (Sb)	>10.0	__No __Yes	Conc. Range	_____
Arsenic (As)	>5.0	__No __Yes	Conc. Range	_____
Barium (Ba)	>100.0	__No __Yes	Conc. Range	_____
Beryllium (Be)	>1.0	__No __Yes	Conc. Range	_____
Cadmium (Cd)	>1.0	__No __Yes	Conc. Range	_____
Chromium (Cr)	>5.0	__No __Yes	Conc. Range	_____
Lead (Pb)	>5.0	__No __Yes	Conc. Range	_____
Mercury (Hg)	>0.2	__No __Yes	Conc. Range	_____
Nickel (Ni)	>5.0	__No __Yes	Conc. Range	_____
Selenium (Se)	>1.0	__No __Yes	Conc. Range	_____
Silver (Ag)	>5.0	__No __Yes	Conc. Range	_____
Thallium (Tl)	>10.0	__No __Yes	Conc. Range	_____

G. SHIPPING INFORMATION

Dot Hazardous Material?_____Yes_____No
Proper Shipping Name_____
Hazard Class _____ ID No._____
Packing Group___Emergency Response Guide No.___
Primary Constituents Contributing To Hazard:
_____
24 Hr. Emergency Phone No._____
Method of Shipment:____Bulk__Drums (Type/Size)____
____Pallets ____Totes ____Other_____
Est Volume:_____Lb/Gal/Dr/Tons/Totes Per____

H. PROPELLANT TYPE: _____

I. SPECIAL HANDLING OR INCOMPATIBILITIES

_____

Is this waste subject to Benzene Waste NESHAP? _____Yes _____No _____Additional Pages Attached

GENERATOR CERTIFICATION

I hereby certify that all information in this and all attached documents are true and accurate, and that all known or suspected hazards have been disclosed. I certify that there are no hazardous constituents or characteristics except as described above, and if the waste stream or process generating the waste changes, I will notify GRR Aerosols prior to shipment of the waste.

_____ _____
Authorized Signature — Title

_____ _____
Printed/Typed Name — Date

 Rev. 10/29/09

ADEM
Alabama Department of Environmental Management

HAZARDOUS WASTE FACILITY PERMIT

PERMITTEE:	**GIANT RESOURCE RECOVERY- ATTALLA, INC.**
ADDRESS:	**1229 VALLEY DRIVE** **ATTALLA, ALABAMA 35954**
PERMIT NUMBER:	**ALD 070 513 767**
UNITS PERMITTED:	**STORAGE IN CONTAINIERS** **STORAGE AND TREATMENT IN TANKS**
ISSUANCE DATE:	**August 29, 2017** **September 29, 2020** **Modification 1 – Minor**
EFFECTIVE DATE:	**August 29, 2017**
EXPIRATION DATE:	**August 28, 2027**

This Permit is issued pursuant with the Code of Alabama 1975, §§ 22-30-1-et. seq., as amended, and regulations adopted thereunder and the Hazardous Wastes Management and Minimization Act and in accordance with the plans and specifications and applications filed with the Department subject to the conditions appended hereto, all of which are considered a part of this Permit. This Permit shall be subject to all applicable laws of the State of Alabama, rules and regulations and orders of the Department of Environmental Management and shall be effective from the date of issuance.

Alabama Department of Environmental Management

ADEM
Alabama Department of Environmental Management

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT

PERMITTEE:	GIANT RESOURCE RECOVERY - ATTALLA INC.
FACILITY LOCATION:	1229 VALLEY DRIVE ATTALLA, AL 35954
PERMIT NUMBER:	AL0054542
RECEIVING WATERS:	DSN002: LITTLE WILLS CREEK DSN003: LITTLE WILLS CREEK DSN004: LITTLE WILLS CREEK

In accordance with and subject to the provisions of the Federal Water Pollution Control Act, as amended, 33 U.S.C. §§1251-1388 (the "FWPCA"), the Alabama Water Pollution Control Act, as amended, Code of Alabama 1975, §§ 22-22-1 to 22-22-14 (the "AWPCA"), the Alabama Environmental Management Act, as amended, Code of Alabama 1975, §§22-22A-1 to 22-22A-17, and rules and regulations adopted thereunder, and subject further to the terms and conditions set forth in this permit, the Permittee is hereby authorized to discharge into the above-named receiving waters.

ISSUANCE DATE:	MAY 21, 2018
EFFECTIVE DATE:	JUNE 1, 2018
EXPIRATION DATE:	MAY 31, 2023

Glenna L. Dean

Alabama Department of Environmental Management

ADEM

ALABAMA
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

AIR PERMIT

PERMITTEE: GIANT RESOURCE RECOVERY – ATTALLA, INC.

LOCATION: ATTALLA, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
307-0019-X006	Storage Tank R 1 (12,000 gallons)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, §§22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, §§22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: February 1, 2006

Alabama Department of Environmental Management

ADEM

ALABAMA
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

AIR PERMIT

PERMITTEE: GIANT RESOURCE RECOVERY – ATTALLA, INC.

LOCATION: ATTALLA, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
307-0019-X007	Storage Tank R 2 (12,000 gallons)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, §§22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, §§22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: February 1, 2006

Alabama Department of Environmental Management

ADEM

ALABAMA
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

AIR PERMIT

PERMITTEE: GIANT RESOURCE RECOVERY – ATTALLA, INC.

LOCATION: ATTALLA, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
307-0019-X008	Storage Tank R 3 (12,000 gallons)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, §§22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, §§22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: February 1, 2006

Alabama Department of Environmental Management

ADEM

ALABAMA
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

AIR PERMIT

PERMITTEE: GIANT RESOURCE RECOVERY – ATTALLA, INC.

LOCATION: ATTALLA, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
307-0019-X009	Storage Tank R 4 (12,000 gallons)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, §§22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, §§22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: February 1, 2006

Alabama Department of Environmental Management

ADEM

ALABAMA
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

AIR PERMIT

PERMITTEE: GIANT RESOURCE RECOVERY – ATTALLA, INC.

LOCATION: ATTALLA, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
307-0019-X010	Storage Tank S & T(#1-#8) (20,000 gallons)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, §§22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, §§22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: February 1, 2006

Alabama Department of Environmental Management

ADEM

ALABAMA
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

AIR PERMIT

PERMITTEE: GIANT RESOURCE RECOVERY – ATTALLA, INC.

LOCATION: ATTALLA, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
307-0019-X011	Storage Tank S & T(#9-#16) (20,000 gallons)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Code of Alabama 1975, §§22-28-1 to 22-28-23 (the "AAPCA") and the Alabama Environmental Management Act, as amended, Code of Alabama 1975, §§22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: February 1, 2006

Alabama Department of Environmental Management

ADEM
Alabama Department of Environmental Management

DEC 15 2008

SYNTHETIC MINOR OPERATING PERMIT

PERMITTEE: GRR – ATTALLA INC.

FACILITY NAME: GRR – ATTALLA INC.

LOCATION: ATTALLA, AL

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
307-0019-X012	Drum and Lid Furnace with Afterburner and Bypass

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Ala. Code §§22-28-1 to 22-28-23 (2006 Rplc. Vol. and 2007 Cum. Supp.) (the "AAPCA") and the Alabama Environmental Management Act, as amended, Ala. Code §§22-22A-1 to 22-22A-15 (2006 Rplc. Vol. and 2007 Cum. Supp.), and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: December 9, 2008

Alabama Department of Environmental Management

Alabama Department of Environmental Management

SYNTHETIC MINOR OPERATING PERMIT

PERMITTEE: GIANT RESOURCE RECOVERY – ATTALLA, INC.

FACILITY NAME:

LOCATION: ATTALLA, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
307-0019-X013	1. Caterpillar fire pump engine (40 CFR 63 subpart ZZZZ) 2. John Deere fire pump engine (40 CFR 63 subpart IIII)

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Ala. Code §§22-28-1 to 22-28-23 (2006 Rplc. Vol. and 2007 Cum. Supp.) (the "AAPCA") and the Alabama Environmental Management Act, as amended, Ala. Code §§22-22A-1 to 22-22A-15 (2006 Rplc. Vol. and 2007 Cum. Supp.), and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE: July 31, 2015

Alabama Department of Environmental Management

U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

SPECIAL PERMIT AUTHORIZATION

DOT-SP 15726

EXPIRATION DATE: 2025-11-30

GRANTEE: Giant Resource Recovery-Attalla, Inc.
Attalla, AL

In response to your November 22, 2021, application for renewal of party status to DOT-SP 15726 as a shipper, the grantee status to DOT-SP15726 for Giant Resource Recovery-Attalla, Inc. is hereby renewed in accordance with 49 CFR 107.113.

Copies of this special permit may be obtained by accessing the Office of Hazardous Materials Safety Homepage at https://www.phmsa.dot.gov/approvals-and-permits/hazmat/special-permits-search. The most recent revision of the special permit supersedes all previous revisions of the special permit. Photo reproductions and legible reductions of this special permit are permitted. Any alteration of this special permit is prohibited.

If you have questions regarding this action please call the Office of Hazardous Materials Safety, General Approvals and Permits Branch at (202) 366-4535.

Issued in Washington D.C. on **December 23, 2021**.

for William Schoonover
Associate Administrator for Hazardous Materials Safety

Tracking Number: 2021115237

DUNS Number on file: 079361970

April 20, 2018

U.S. Department
of Transportation

Pipeline and Hazardous
Materials Safety Administration

East Building, PHH-30
1200 New Jersey Avenue S.E.
Washington, D.C. 20590

DOT-SP 15726
(THIRD REVISION)

(FOR RENEWAL, SEE 49 CFR § 107.109)

1. GRANTEE: (See individual authorization letter)

2. PURPOSE AND LIMITATION:

a. This special permit authorizes the transportation in commerce of certain Division 2.1 and Division 2.2 materials in aerosol cans contained in strong outer packages with a gross mass not to exceed 500 kg to a recycling or disposal facility. This special permit provides no relief from the Hazardous Materials Regulations (HMR) other than as specifically stated herein. The most recent revision supersedes all previous revisions.

b. The safety analyses performed in the development of this special permit only considered the hazards and risks associated with the transportation in commerce.

c. Unless otherwise stated herein, this special permit consists of the special permit authorization letter issued to the grantee together with this document.

3. REGULATORY SYSTEM AFFECTED: 49 CFR Parts 106, 107 and 171-180.

4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR §§ 173.306(k)(1)(ii) in that each aerosol container must be secured with a cap or the valve stem must be removed, and 173.156(b) in that aerosols not classed as ORM-D may be shipped in accordance with the requirements of this section, except as specified herein.

5. BASIS: This special permit is based on the application of Giant Resource Recovery - Attalla, Inc. dated August 31, 2014 submitted in accordance with § 107.109 and additional information dated April 12, 2018.

Tracking Number: 2018049729

6. HAZARDOUS MATERIALS (49 CFR § 172.101):

Hazardous Materials Description			
Proper Shipping Name	**Hazard Class/ Division**	**Identification Number**	**Packing Group**
Aerosols, *flammable, (each not exceeding 1 L capacity)*	2.1	UN1950	N/A
Aerosols, *non-flammable, (each not exceeding 1 L capacity)*	2.2	UN1950	N/A
Aerosols, *corrosive, Packing Group II or III, (each not exceeding 1 L capacity)*	2.2	UN1950	N/A
Aerosols, *poison, each not exceeding 1 L capacity*	2.2	UN1950	N/A

7. SAFETY CONTROL MEASURES:

a. PACKAGING - Packaging prescribed are aerosol cans contained in strong outer packagings conforming to the requirements described in §§ 173.24 and 173.24a for shipment to a recycling or disposal facility. Gross mass of the outside packaging must be less than 500 kg.

b. OPERATIONAL CONTROLS -

(1) Materials which may react to form a dangerous atmosphere may not be shipped in the same package.

(2) The packages may only be transported by private carrier or contract or common carrier under the exclusive use of the shipper.

(3) Motor vehicles transporting hazardous materials under the terms of this Special Permit must be equipped with no less than three atmospheric sensors, placed in the front, center, and rear of the cargo area. If the atmosphere exceeds 10% of the lower explosive limit

(LEL) of the materials being shipped, transportation must be halted and the motor vehicle vented until the atmosphere is below 10% of the LEL.

8. SPECIAL PROVISIONS:

a. A person who is not a holder of this special permit who receives a package covered by this special permit may reoffer it for transportation provided no modification or change is made to the package and it is reoffered for transportation in conformance with this special permit and the HMR.

b. A current copy of this special permit must be maintained at each facility where the package is offered or reoffered for transportation.

c. Each outer packaging must be marked on two sides in letters at least 2 inches high on a contrasting background, "DOT-SP 15726".

9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle.

10. MODAL REQUIREMENTS: A current copy of this special permit must be carried aboard each motor vehicle used to transport packages covered by this special permit.

11. COMPLIANCE: Failure by a person to comply with any of the following may result in suspension or revocation of this special permit and penalties prescribed by the Federal hazardous materials transportation law, 49 U.S.C. 5101 et seq:

- All terms and conditions prescribed in this special permit and the Hazardous Materials Regulations, 49 CFR Parts 171-180.
- Persons operating under the terms of this special permit must comply with the security plan requirement in Subpart I of Part 172 of the HMR, when applicable.
- Registration required by § 107.601 et seq., when applicable.

Each "Hazmat employee", as defined in § 171.8, who performs a function subject to this special permit must receive training on the requirements and conditions of this special permit in addition to the training required by §§ 172.700 through 172.704.

No person may use or apply this special permit, including display of its number, when this special permit has expired or is otherwise no longer in effect.

Under Title VII of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) – "The Hazardous Materials Safety and Security Reauthorization Act of 2005" (Pub. L. 109-59), 119 Stat. 1144 (August 10, 2005), amended the Federal hazardous materials transportation law by changing the term "exemption" to "special permit" and authorizes a special permit to be granted up to two years for new special permits and up to four years for renewals.

12. REPORTING REQUIREMENTS: Shipments or operations conducted under this special permit are subject to the Hazardous Materials Incident Reporting requirements specified in 49 CFR §§ 171.15 - Immediate notice of certain hazardous materials incidents, and 171.16 - Detailed hazardous materials incident reports. In addition, the grantee(s) of this special permit must notify the Associate Administrator for Hazardous Materials Safety, in writing, of any incident involving a package, shipment or operation conducted under terms of this special permit.

Issued in Washington, D.C.:

for William Schoonover
Associate Administrator for Hazardous Materials Safety

Address all inquiries to: Associate Administrator for Hazardous Materials Safety, Pipeline and Hazardous Material Safety Administration, U.S. Department of Transportation, East Building PHH-30, 1200 New Jersey Avenue, Southeast, Washington, D.C. 20590.

Copies of this special permit may be obtained by accessing the Hazardous Materials Safety Homepage at http://hazmat.dot.gov/sp_app/special_permits/spec_perm_index.htm. Photo reproductions and legible reductions of this special permit are permitted. Any alteration of this special permit is prohibited.

PO: Andrew Eckenrode

UNITED STATES OF AMERICA
DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION

HAZARDOUS MATERIALS CERTIFICATE OF REGISTRATION FOR REGISTRATION YEAR(S) 2022-2023

Registrant: GIANT RESOURCE RECOVERY ATTALLA INC
ATTN: Alicia Lee
654 JUDGE STREET
HARLEYVILLE, SC 29448

This certifies that the registrant is registered with the U.S. Department of Transportation as required by 49 CFR Part 107, Subpart G.

This certificate is issued under the authority of 49 U.S.C. 5108. It is unlawful to alter or falsify this document.

Reg. No: 052322550041E Effective: July 1, 2022 Expires: June 30, 2023

HM Company ID: 5859

Record Keeping Requirements for the Registration Program

The following must be maintained at the principal place of business for a period of three years from the date of issuance of this Certificate of Registration:

(1) A copy of the registration statement filed with PHMSA; and

(2) This Certificate of Registration

Each person subject to the registration requirement must furnish that person's Certificate of Registration (or a copy) and all other records and information pertaining to the information contained in the registration statement to an authorized representative or special agent of the U. S. Department of Transportation upon request.

Each motor carrier (private or for-hire) and each vessel operator subject to the registration requirement must keep a copy of the current Certificate of Registration or another document bearing the registration number identified as the "U.S. DOT Hazmat Reg. No." in each truck and truck tractor or vessel (trailers and semi-trailers not included) used to transport hazardous materials subject to the registration requirement. The Certificate of Registration or document bearing the registration number must be made available, upon request, to enforcement personnel.

For information, contact the Hazardous Materials Registration Manager, PHH-52, Pipeline and Hazardous Materials Safety Administration, U.S. Department of Transportation, 1200 New Jersey Avenue, SE, Washington, DC 20590, telephone (202) 366-4109.

Giant Resource Recovery, Inc.

Giant Resource Recovery - Attalla, Inc. / 1229 Valley Drive, Attalla, AL 35954
(800) 637-4023 / Fax (256) 538-1836 / 888-Grr-GCHI /
www.giantresourcerecovery.com

RE: INSURANCE COVERAGE – Giant Resource Recovery-Attalla, Inc (GRR)

To Whom it May Concern:

Please be advised that Giant Resource Recovery-Attalla, Inc. works with insurance brokers to maintain a comprehensive property and casualty insurance program utilizing insurance markets in the United States. We maintain coverage for general, automobile, worker's compensation, environmental sites, excess and damage to our property. Our limits and retentions are consistent with a company of GRR's relative size.

Questions pertaining to this letter of insurance coverage can be directed to my attention.

Sincerely,

Ken Bolcar
Attalla Sales Manager
kbolcar@gchi.com

Giant Resource Recovery - Attalla, Inc.

1229 Valley Drive
Attalla, AL 35954
(256) 538-3800
Fax (256) 538-1836

VIA ELECTRONIC MAIL AND CERTIFIED MAIL
RETURN RECEIPT REQUESTED

February 1, 2022

Ms. Linda Knickerbocker
Alabama Department of Environmental Management
Industrial Facilities Section
1400 Coliseum Boulevard
Montgomery, Alabama 36130-1463

Re: Annual Adjustment of Closure Cost Estimate (2022)
Giant Resource Recovery – Attalla, Inc.
Attalla, Alabama
EPA ID Number ALD 070 513 767

Dear Ms. Knickerbocker:

Pursuant to Alabama Department of Environmental Management Regulation 335-14-5-.08(3)(b), Giant Resource Recovery – Attalla, Inc. (GRR) submits its annual closure cost estimate update. The closure cost estimate was calculated using an inflation factor derived by a ratio of the 2021 3rd Quarter[1] and 2020 3rd Quarter[2] Implicit Price Deflators for Gross Domestic Product (119.093/113.801)[3] provided in Table 1.1.9 of the *Bureau of Economic Analysis Gross Domestic Product Report*. The updated closure cost estimate for fiscal year 2022 is $2,659,812.[4] This figure is based on updated closure costs (in 2021 3rd Quarter dollars) of $1,429,527 for the RCRA Storage Units and $1,230,284 for Corrective Action.

Should you have any questions or require additional information, please contact Mr. Kyle C. Seagraves (256) 538-3800 ext. 8710, or me at (803) 496-2284.

Sincerely,

Lane H. Smith, P.E.
Manager, Environmental, Health, and Safety Affairs

cc: US EPA Region IV
Ricardo Yllescas Alvarez, GRR
Kyle C. Seagraves, GRR
Cynthia Tidmore, GRR

---

[1] The 3rd Quarter 2021 factor is the most recent available. It was last updated on January 27, 2022.
[2] The 3rd Quarter 2020 factor is the factor as published on January 28, 2021.
[3] Line 27 (Gross National Product) of Table 1.1.9.
[4] Due to rounding, the total closure cost does not equal the sum of the two component closure costs.

LANCE R. LEFLEUR
DIRECTOR

KAY IVEY
GOVERNOR

Alabama Department of Environmental Management
adem.alabama.gov
1400 Coliseum Blvd. 36110-2400 • Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 • FAX (334) 271-7950

April 21, 2022

TRANSMITTED ELECTRONICALLY

Mr. Kyle C. Seagraves
Environmental, Health, and Safety Manager
Giant Resource Recovery - Attalla, Inc.
1229 Valley Drive
Attalla, Alabama 35954

Re: Annual Adjustment of Closure Cost Estimate (2022)
Giant Resource Recovery (GRR) - Attalla, Inc.
1229 Valley Drive
Attalla, Alabama 35954
USEPA I.D. Number ALD 070 513 767

Dear Mr. Seagraves:

The Department has reviewed the Annual Adjustment of Closure and Corrective Action Cost Estimates (2022), dated February 1, 2022, and has determined it appears to be adequate and in compliance with the facility's Permit and ADEM Admin. Code Rules. 335-14-5-.08(3)(b) and 335-14-5-.08(10)(b) for the annual cost estimates inflation adjustment. The facility should submit an updated financial assurance instrument to meet the increased requirement within 60 days of the receipt of this letter.

If questions and comments should arise concerning this matter, please contact Tamaria L. McAlpin of the Engineering Services Branch, at (334) 274-4188.

Sincerely,

Austin R. Pierce

Austin R. Pierce, Chief
Engineering Services Section
Industrial Hazardous Waste Branch
Land Division

ARP/TM

cc/via email: ADEM: Wade Reeves, Brent Watson, Ricky Minor
GRR: Stephen P. Holt, Lane Smith

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
(205) 941-1603 (Fax)

Decatur Branch
2715 Sandlin Road, S. W.
Decatur, AL 35603-1333
(256) 353-1713
(256) 340-9359 (Fax)

Mobile Branch
2204 Perimeter Road
Mobile, AL 36615-1131
(251) 450-3400
(251) 479-2593 (Fax)

Mobile - Coastal
4171 Commanders Drive
Mobile, AL 36615-1421
(251) 432-6533
(251) 432-6598 (Fax)