

# RECEIPT

DATE 07/25/24No. 654518RECEIVED FROM Ironclad Environmental Services \$ 350.00Three Hundred Fifty and 0/100 — DOLLARS FOR RENT FORNew HW APP

ACCOUNT	
PAYMENT	
BAL. DUE	

 CASH CHECK MONEY  
ORDER CREDIT  
CARDFROM #067577 TO \_\_\_\_\_BY E.W.



FLEET SOLUTIONS since 1986

## ATTENTION PERMIT DEPARTMENT

I am writing to you on behalf of NECS Fleet Solutions, a dedicated team committed to assisting clients in navigating the permitting process efficiently and effectively. We are currently in the process of applying for a permit on behalf of one of our clients and want to reach out to ensure a smooth and timely resolution.

We understand the importance of adhering to all regulations and requirements set forth by the state. Our goal is to facilitate this process for our clients, ensuring they can commence their operations promptly and in full compliance with the law.

To that end, we kindly request the opportunity to discuss any questions or concerns you may have regarding our permit application. We believe that open communication and collaboration are key to addressing any potential issues and reaching a favorable outcome for all parties involved.

*Please feel free to reach out to us at*

*[kreoh@necssolutions.com](mailto:kreoh@necssolutions.com)*

*or*

*by phone at 920-850-2483*

We are committed to providing any additional information or documentation necessary to expedite the approval process.

.....



STATE OF DELAWARE  
DEPARTMENT OF NATURAL RESOURCES  
AND ENVIRONMENTAL CONTROL  
DIVISION OF WASTE AND HAZARDOUS SUBSTANCES  
COMPLIANCE AND PERMITTING SECTION

89 KINGS HIGHWAY  
DOVER, DELAWARE 19901

TELEPHONE: (302) 739-9403  
FAX: (302) 739-5060

### HAZARDOUS WASTE TRANSPORTER PERMIT APPLICATION

**Instructions:** You must complete this application in its entirety and attach all applicable documentation.

**(Note:** For applicants renewing an existing permit, this application requires the submission of updated information and documentation.)

The application must be signed by the company owner or a corporate officer. A check payable to the "State of Delaware" must accompany this application.

Delaware Department of Natural Resources and Environmental Control  
Compliance and Permitting Section  
89 Kings Highway  
Dover, DE 19901

#### 1. Type of Permit

- New – Submit a check or money order, payable to the "State of Delaware," in the amount of \$350.00.
- Renewal: Permit # DE-HW- \_\_\_\_\_ Expiration Date \_\_\_\_\_

Please indicate the term for which you desire your permit to be issued. Submit a check or money order, payable to the "State of Delaware," for the indicated permit fee.

- One Year - \$350.00
- Two Years - \$650.00
- Three Years - \$950.00
- Four Years - \$1250.00
- Five Years - \$1550.00

#### 2. Release to Public:

Do you wish to be included on the list of transporters that is provided to persons requesting a list of Delaware permitted hazardous waste transporters?  Yes  No

**3. Company Information:**

Company Name: Ironclad Environmental Solutions, LLC

Location Address:	Mailing Address:
	4888 Suite 440, Houston, TX 77081

Contact Person: Don Richard Title: \_\_\_\_\_

Business Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

E-mail: drichard@ironcladenvironmental.com 24 hr. Emergency Phone: \_\_\_\_\_

EPA Identification Number: TXR000079368

Employer's Federal Tax ID Number: 87-0795847

**4. Type of Company: (Check One)**

- Proprietorship
- Partnership
- Corporation – City, State and Date of Incorporation: Houston, TX 3/3/2007
- Municipality
- Public Institution
- Other – Explanation: \_\_\_\_\_

**5. Parent Company Information:**

Parent Company Name: Gulf Tank Holdings, Inc.

Parent Company Address: 1650 East Fwy Baytown, TX 77521

**6. Ownership/Stockholder Information:**

For each owner, partner, or corporate officer, list the name, title, home address, and date of birth.

List of owners, partners, or corporate officers: Attachment Eric John, CEO

List the name and address of all stockholders owning greater than 5% outstanding shares.

- List of stockholders: Attachment \_\_\_\_\_
- Not Applicable

**7. Company Affiliations:**

List all other companies owned by the same owners, corporate officers, or parent company that are engaged in the business of solid or hazardous waste transportation, treatment, storage, disposal, recovery, or reclamation.

- List of company affiliates: Attachment \_\_\_\_\_
- No company affiliates

**8. Type of Hazardous Waste to be Transported:**

Indicate the waste types to be transported. (Note: Characteristic and listed hazardous wastes identified in Delaware's *Regulations Governing Hazardous Waste (DRGHW)* Part 261 are equivalent to RCRA 40 CFR Part 261 wastes.) Check all that apply.

- Part 261 characteristic or listed hazardous wastes
- Used or waste oils (as defined by Part 279, Used Oil Management Standards)
- Spent antifreeze exhibiting a characteristic of hazardous waste
- PCB-contaminated hazardous waste
- Spent fluorescent lighting tubes and ballasts when managed as non-universal waste

**9. Treatment, Storage, and Disposal Facilities:**

List all treatment, storage, and disposal facilities that have agreed to accept the hazardous wastes identified above.

- List of treatment, storage, and disposal facilities: Attachment           /

**10. Other Transporter Permits:**

List all hazardous waste transporter permits held in other states.

- List of transporter permits: Attachment attached
- No hazardous waste transporter permits held in other states

**11. Federal DOT and Motor Carrier Numbers:**

Indicate your Federal DOT number and Motor Carrier number:

DOT# 1624598 MC# MC00657559

**12. Proof of Insurance:**

The transporter identified in this application must meet or exceed minimum insurance requirements as set forth in DOT Title 49 CFR Part 387. The DNREC Compliance and Permitting Section must be identified as the certificate holder. Also include a current MCS-90 endorsement or affirmation that the endorsement is still in effect.

- Certificate of insurance and MCS-90: Attachment \_\_\_\_\_

**13. Spill Control and Safety Equipment:**

List all spill control and safety equipment that will be carried on each vehicle.

List of spill control and safety equipment: Attachment Spill Kit to inclu

**14. Spill Control Plan:**

Attach a copy of the Spill Control Plan that describes prevention, containment, and clean up procedures during transportation. The plan must demonstrate compliance with the requirements outlined in DRGHW Sections 263.30, 263.31, and 263.105. **Spill Control Plans must contain the following Delaware Emergency Reporting Telephone Numbers: 1-800-662-8802 and 302-739-9401.**

Spill Control Plan: Attachment 1 sec 1-3

**15. Driver Training:**

Attach a copy of your driver training program. All drivers must be trained in current DOT Motor Carrier Safety Regulations and have knowledge of the proper handling procedures for the type of waste transported, the hazardous waste manifest system, and safe vehicle operation as provided in 49 CFR Parts 383, 390 – 399, and DRGHW Section 263.104. All drivers must be familiar with the approved Spill Control Plan.

Driver Training Program: Attachment sec 4

**16. Controlled Substance Testing:**

Do you maintain a controlled substance testing program for drivers in your employment (including contract drivers) in compliance with Federal DOT 49 CFR Part 391?

Yes

No, Explain:

**17. Vehicle Identification Information:**

List all vehicles to be used for the transportation of hazardous waste into, out of, or through Delaware. You may use the form provided or another printout that contains all required information.

Vehicle Identification Information: Attachment 2

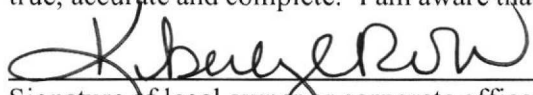
**18. Environmental Record:**

List all criminal citations, arrests or convictions, civil or administrative violations, and civil or administrative enforcement actions, and the disposition(s) thereof for the violation or alleged violation of any environmental statute, regulation, permit, license, approval, or order, regardless of the state in which it occurred. Indicate whether it was a local, state, or federal violation or alleged violation. List all such items for the applicant, and if the applicant is other than an individual, for any employee while employed by the applicant or any partner, officer, or director of the applicant as an individual or for any other former business of such partner, officer, or director. For civil or administrative violations or alleged violations, list all such items for the last five (5) years from the date of application.

- Environmental Record: Attachment \_\_\_\_\_
- Not Applicable – No violations within the specified time period

**19. Signature:**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments, and that upon personal knowledge and information, the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information.

  
\_\_\_\_\_  
Signature of legal owner or corporate officer

KIMBERLY REOH  
Printed Name

7-16-24  
Date

DIRECTOR  
Title

<b>BRANCH</b>	<b>TRUCK#</b>	<b>YEAR</b>	<b>MAKE</b>	<b>MODEL</b>	<b>TYPE</b>	<b>VIN#</b>	<b>COLOR</b>	<b>PLATE#</b>	<b>STATE</b>
1380	MD598	2015	KENWORTH	T800	WINCH TRACTOR	1XKDD49X5FJ435598	RED	3655904	IN
1380	MD215	2008	MACK		ROLL OFF TRUCK	1M2AG11C67M063424	RED	3655903	IN
1380	MT2401	2024	MACK	GRANITE	ROLL OFF TRUCK	1M2GR2GC6RM042173	WHITE	3656542	IN
1380	MT2430	2025	KENWORTH		ROLL OFF TRUCK	1NKDL40X9SR111981	WHITE	3658657	IN
1900	VA167	2013	KENWORTH	T800	WINCH TRACTOR	1XKDD49X0DJ362539	RED	3656534	IN



**Ironclad Environmental Solutions, Inc.**  
**SPILL CONTINGENCY PLAN**  
**HAZARDOUS WASTE / USED OIL TRANSPORT**

I. **EMERGENCY ACTION:** In the event of an on-the-road spill or other emergency, the driver will follow these procedures:

A. Remain with the unit and warn all pedestrians and motorists to stay away from the spill area, pointing out to them the danger involved, and call the police / 911 or have someone call the police / 911.

B. Upon the arrival of the police or fire department, the driver will inform them of what kind of material has been spilled, hand them the manifest/paperwork if possible and request the area to be blocked off to both pedestrians and vehicles to prevent property damage or any serious personal injury.

The driver will request the first responder, fire or police personnel, to protect the area while the driver reports to a facility Branch Manager/Emergency Coordinator (listed below in the order of calling):

**Branch Manager/ Emergency Coordinator**

Name: Samuel Roberts  
Phone number: [REDACTED]

**Corporate Safety Manager**

Name: Aimee Wilson  
Phone Number: [REDACTED]

**Regional Vice President**

Name: Chad Kruger  
Phone Number: [REDACTED]

A. The Branch Manager/Emergency Coordinator will gather the following information from the driver and relay it to the National Response Center, and if required our 24/7 spill response partner ERTS at (888) 585-5028.

1. Name of person reporting the incident.
2. Name, address, and Identification Number of the transporter.
3. Phone number where person reporting can be reached.
4. Date, time, and location of the incident.
5. The extent of injuries, if any.
6. Classification, name, and quantity of hazardous materials/wastes involved, if such information is available.
7. Type of incident and nature of hazardous material/waste involvement and

- whether a continuing danger exists at the scene.
8. For each waste product involved provide:
    - a. Name and Identification Number of generator.
    - b. Product shipping, hazardous class, and UN or NA Number.
    - c. Estimated quantity of material spilled.
    - d. If possible, estimate the extent of contamination to land, water, or air.
  9. Shipping name, hazard class, and Identification Number of any other material carried.

EMERGENCY RESPONSE AGENCIES:

AGENCY	TOLL FREE NUMBER	REGULAR NUMBER
U.S. National Response Center	(800) 424-8802	(202) 426-2675
Alabama Emergency Management Agency Hazardous Materials/Waste Incidents	(800) 843-0699	(302) 659-3362
U.S. Coast Guard, Lewes		(302) 644-1909
CHEMTREC	(800) 424-9300	
<u>ERTS</u>	(888) 585-5028	

D. Specific actions to be taken at the scene of the spill are:

I. Containment - The critical problem is to prevent the escape of any spilled liquid or solid into the ground or into a storm or sanitary sewer. A barrier must be erected immediately to prevent escape of spilled materials/waste liquids, using whatever material is at hand, even a dirt curb to prevent spreading of the spill. Containment of solids will be dependent on wind and weather conditions. Use the box tarp in the vehicle, or plastic visqueen if conditions are wet and windy. Simultaneously, the source of the spill or leak must be located and controlled (e.g., box hole plugged or taped or container turned right-side up).

The possibility of evacuation should be considered in the event of a major spill (e.g., a collision with another vehicle or a loaded trailer that has turned over, with subsequent container(s) rupturing). Major concerns involve ignitable wastes that may catch fire and possibly explode or generate toxic fumes. If fire threatens or actually occurs, personnel should be evacuated a distance of at least a half-mile as recommended by the Emergency Response Guidebook. If no fire threatens, and no container (s) have ruptured, a distance of 50-100 feet should suffice.

If the shipping description is known (refer to the manifest) find the name in your Emergency Response Guidebook in the blue pages and turn to the Corresponding Guide Number (orange top page-last 1/3 of book). If the shipping description is not known check the placard on the vehicle for a "UN" or a "NA" number, look up

the number in the yellow pages and refer to the Corresponding Guide Number, or contact the generator of the waste for safety data.

2. Cleanup - With containment effected and the spillage source controlled, cleanup is the next step. If the spill is contained on an impervious paved surface, material should be absorbed onto a compatible material (e.g., sand, diatomaceous earth). Any of a number of commercial absorbent inert materials may be used, but make sure they are compatible with the waste and will not cause a reaction. If the spillage has reached soil, all contaminated dirt should be collected into drums or bags for disposal at an EPA approved site.

If any spilled waste has reached the ground, the contaminated soil will be removed. The extent of contamination will be determined by sampling the spill area. A qualified laboratory will analyze the sample. Sampling techniques, chain-of-custody requirements, and analytical methods will follow approved procedures such as those outlined in SW-846 (Test Methods for Evaluating Solid Waste: Physical/Chemical Methods Compendium). Any soil exhibiting contamination above the local background level will be removed to an appropriate permitted disposal site.

In addition to contaminated absorbents, dirt, or the like as noted above, damaged containers also present a disposal problem. Special "recovery drums" (oversize metal drums) will be used for containing damaged 55-gallon drums. Disposal will be at an approved site.

II. EMERGENCY EQUIPMENT: Each tractor or trailer carries the following emergency equipment:

- Gloves
- Goggles
- Slicker Suite
- Oil Absorbing Socks & Pads
- Boots
- DOT Emergency Response Guidebook
- Emergency Reflective Triangles (3)
- Flares
- ABC Fire Extinguisher

III. FOLLOW-UP PROCEDURES: Two steps remain once the immediate emergency aspects of a spill have been taken care of:

A. *Decontamination:*

Trucks or trailers exposed to a spill or leak will be decontaminated at the site in order to prevent any further release to the extent that it can be transported (or move under its own power) to an authorized facility capable of further decontamination if necessary.

Equipment - Each item used will be placed in an open head container and thoroughly rinsed with a compatible solvent or cleaning compound. The residue or wash water will then be drained into a tight head container, sealed, and disposed of in accordance with Federal and State Regulations at an authorized disposal site.

Clothing - Contaminated clothing will be placed with the clean up residue and disposed of in accordance with Federal and State Regulations at an authorized disposal site. If clothing is reusable, then it will be decontaminated properly and the residue added to the other waste.

B. *Notification:* The Department of Transportation, Director of Hazardous Materials Registration, Materials and Transportation Bureau, Washington, DC 20590 will be notified, in writing, of the occurrence, and nature of the incident.

**IV. TRAINING PROGRAM:** In preparation for handling hazardous materials and hazardous wastes, all drivers and response personnel receive approximately two (2) hours classroom training followed by refresher training by local management at regular scheduled (at least monthly) safety tailgate meetings. In addition to the above, an annual meeting is held to educate further each Branch Manager on changes in regulations.

A. The following is a list of classroom training provided to all branch personnel responsible for the handling and transportation of hazardous waste:

1. RCRA Hazardous Waste Manifesting
2. Container Receiving and Maintenance
3. Container Inspections
4. Container Transferring
5. Container Pickup Checklist
6. Re-use of Containers for Hazardous Waste
7. Emergency Response Equipment
8. Emergency Procedures
9. Hazardous Waste Labeling
10. Emergency Spills

B. Since much of the drivers' actions involve hazardous materials, including hazardous wastes, their instructions specifically include:

1. Inspection of their vehicles before and during trips;
2. Driving Rules;
3. Knowledge of safety and health hazards of products carried (e.g., flammable, and corrosive); and
4. Actions to be implemented in case of spills, accidents, or other emergencies involving hazardous materials and hazardous wastes.



AGENCY CUSTOMER ID: \_\_\_\_\_

LOC #: \_\_\_\_\_



# ADDITIONAL REMARKS SCHEDULE

Page \_\_\_\_ of \_\_\_\_

<b>AGENCY</b> Ironwood, a Marsh & McLennan Agency, LLC Co		<b>NAMED INSURED</b> Ironclad Environmental Solutions, Inc.	
<b>POLICY NUMBER</b>  		<b>EFFECTIVE DATE:</b>  	
<b>CARRIER</b>  	<b>NAIC CODE</b>  		

### ADDITIONAL REMARKS

**THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM,**  
**FORM NUMBER:** 25      **FORM TITLE:** Certificate of Liability Insurance: Notes

Excess General Liability/Pollution Liability  
 Axis Surplus Insurance Company  
 Policy # MX005965-01-2023  
 Effective 9/30/2023 to 9/30/2024  
 \$10,000,000 Occurrence  
 \$10,000,000 Aggregate

Cyber Liability  
 Certain Underwriters at Lloyd's London and other insurers  
 Policy # ACS1241424  
 Effective 4/1/2024- 4/1/2025  
 \$5,000,000 Limit

Contractors Pollution Liability  
 Axis Surplus Insurance Company  
 Policy #MP005964-01-2023  
 \$1,000,000 Limit

**Additional Named Insureds:**

1. Ironhorse Parent, LP
2. Ironhorse Intermediate, LLC
3. Ironhorse Purchaser, LLC
4. Gulf Tanks Holdings, Inc.
5. Water Movers Contracting, LLC
6. Adler Tank Rentals, LLC
7. DenBeste Water Solutions, LLC
8. DenBeste Transportation, LLC

## Davis, DaQuan (DNREC)

---

**From:** Kimberly Reoh <kreoh@necssolutions.com>  
**Sent:** Tuesday, September 10, 2024 10:52 AM  
**To:** Grazier, Tara (DNREC)  
**Cc:** Davis, DaQuan (DNREC); Sarah Mendoza  
**Subject:** RE: Applications  
**Attachments:** MCS-90 - Expires 06.30.27.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Here you go 😊

Thanks,

Kimberly Reoh  
Director- Specialty Services  
920-850-2483

Harness the power of motion to effortlessly schedule meetings!  
[Schedule a Meeting with Kimberly here!](#)

---

**From:** Grazier, Tara (DNREC) <Tara.Grazier@delaware.gov>  
**Sent:** Friday, September 6, 2024 1:05 PM  
**To:** Kimberly Reoh <kreoh@necssolutions.com>  
**Cc:** Davis, DaQuan (DNREC) <daquan.davis@delaware.gov>; Sarah Mendoza <smendoza@necssolutions.com>  
**Subject:** RE: Applications

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Okay. Have you gotten the updated MCS-90?



**Tara C. Grazier**

Planner II

Phone: 302-739-9403

Email: [tara.grazier@delaware.gov](mailto:tara.grazier@delaware.gov)

89 Kings Highway Dover, DE 19901

[dnrec.delaware.gov](http://dnrec.delaware.gov)





**From:** Kimberly Reoh <[kreoh@necssolutions.com](mailto:kreoh@necssolutions.com)>  
**Sent:** Friday, September 6, 2024 12:31 PM  
**To:** Grazier, Tara (DNREC) <[Tara.Grazier@delaware.gov](mailto:Tara.Grazier@delaware.gov)>  
**Cc:** Davis, DaQuan (DNREC) <[daquan.davis@delaware.gov](mailto:daquan.davis@delaware.gov)>; Sarah Mendoza <[smendoza@necssolutions.com](mailto:smendoza@necssolutions.com)>  
**Subject:** RE: Applications

They are applying now for PA Haz.

Thanks,

Kimberly Reoh  
Director- Specialty Services  
920-850-2483

Harness the power of motion to effortlessly schedule meetings!  
[Schedule a Meeting with Kimberly here!](#)

**From:** Grazier, Tara (DNREC) <[Tara.Grazier@delaware.gov](mailto:Tara.Grazier@delaware.gov)>  
**Sent:** Friday, September 6, 2024 7:06 AM  
**To:** Kimberly Reoh <[kreoh@necssolutions.com](mailto:kreoh@necssolutions.com)>  
**Cc:** Davis, DaQuan (DNREC) <[daquan.davis@delaware.gov](mailto:daquan.davis@delaware.gov)>; Sarah Mendoza <[smendoza@necssolutions.com](mailto:smendoza@necssolutions.com)>  
**Subject:** RE: Applications

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Kimberly,

Thank you for the clarification. With the disposal facility in PA, does the company plan to obtain a permit in PA?

Thank you,  
Tara



**Tara C. Grazier**

Planner II

Phone: 302-739-9403

Email: [tara.grazier@delaware.gov](mailto:tara.grazier@delaware.gov)

89 Kings Highway, Dover, DE 19901

[dnrec.delaware.gov](http://dnrec.delaware.gov)



**From:** Kimberly Reoh <[kreoh@necssolutions.com](mailto:kreoh@necssolutions.com)>  
**Sent:** Thursday, September 5, 2024 4:48 PM  
**To:** Grazier, Tara (DNREC) <[Tara.Grazier@delaware.gov](mailto:Tara.Grazier@delaware.gov)>

**Cc:** Davis, DaQuan (DNREC) <[daquan.davis@delaware.gov](mailto:daquan.davis@delaware.gov)>; Sarah Mendoza <[smendoza@necssolutions.com](mailto:smendoza@necssolutions.com)>

**Subject:** RE: Applications

Hi Tara,

Please see the below Haz Drop site.

Clean Earth  
2869 Sandstone Dr  
Hatfield, PA 19440  
678-822-9963

We would like to add used oils Part 279 to the application.

I am currently pending the updated MCS90.

Below is a list of all Haz and their status at this time. Please let me know if you have any further questions or need additional assistance.

STATE	PERMIT	STATUS
CT	HAZARDOUS WASTE HAULER	ACTIVE
WI	HAZARDOUS	ACTIVE
SC	HAZARDOUS	ACTIVE
DE	HAZARDOUS	PENDING INFO
AL	HAZARDOUS	IN PROCESS AT STATE
CA	HAZARDOUS WASTE HAULER	PENDING INFO
MI	HAZARDOUS WASTE HAULER	IN PROCESS AT NECS
NY	SOLID WASTE/HAZARDOUS	ACTIVE

Thanks,

Kimberly Reoh  
Director- Specialty Services  
920-850-2483

Harness the power of motion to effortlessly schedule meetings!

[Schedule a Meeting with Kimberly here!](#)

---

**From:** Grazier, Tara (DNREC) <[Tara.Grazier@delaware.gov](mailto:Tara.Grazier@delaware.gov)>

**Sent:** Thursday, September 5, 2024 9:26 AM

**To:** Kimberly Reoh <[kreoh@necssolutions.com](mailto:kreoh@necssolutions.com)>

**Subject:** Applications

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Kimberly,

I called and left a message for you yesterday regarding your transporter application. Can you please return my phone call to discuss the application?

Thank you,  
Tara



**Tara C. Grazier**

Planner II

Phone: 302-739-9403

Email: [tara.grazier@delaware.gov](mailto:tara.grazier@delaware.gov)

89 Kings Highway, Dover, DE 19901

[dnrec.delaware.gov](http://dnrec.delaware.gov)





STATE OF DELAWARE

DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENTAL  
CONTROL

DIVISION OF WASTE AND HAZARDOUS SUBSTANCES

89 KING'S HIGHWAY  
DOVER, DE 19901

COMPLIANCE &  
PERMITTING

PHONE: (302) 739-3000  
FAX: (302) 739-5060

August 13, 2024

Certified Mail  
Return Receipt Requested  
7021 1970 0000 8507 7668

**NOTICE OF DEFICIENCY**  
**24-HW-02**

Don Richard  
Ironclad Environmental Solutions, LLC  
4888 Loop Center Drive, Suite 440  
Houston, TX, 77081

Subject: Notice of Deficiency  
Reference: Application for Delaware Hazardous Waste Transporter Permit, DE-HW-0663

Dear Mr. Richard:

The Delaware Department of Natural Resources and Environmental Control (DNREC), Compliance and Permitting Section (CAPS) is in receipt of your application for a permit to transport hazardous waste in, through, or out of the State of Delaware. The application was received by this office on July 25, 2024.

After a review of your application, the CAPS has determined that the application is deficient. Since receipt of your application, we have made attempts to contact you to secure the deficient information but failed to receive a response. In order for the CAPS to continue to process your application, you must submit the following information as listed per the transporter permit application item number.

- Item 3 requires Company Information. Please complete item 3 as required.
- Item 6(a) requires Company Ownership Information. Please complete item 6(a) as applicable and attach company information as required.
- Item 6(b) requires Company Ownership Information. Please complete item 6(b) as applicable and attach company information as required.
- Item 9 requires your Transfer, storage, disposal, and facilities. Please complete item 9 as required.
- Item 10 requires A list of hazardous waste permits held in other states. Please complete item 10 as required.
- Item 12 requires an MCS-90 endorsement form. Please provide this form.

- Item 14(b) Missing Delaware Emergency Reporting Numbers. Spill Plan must include the following numbers (800) 662-8802 and (302) 739-9401.
- Item 17 requires a list identifying vehicles. The list you submitted is missing some models, manufacturer's GVWR, and ownership status. Please update the list.
- Item 19 Certification. Please amend item 19 and ensure the application is signed by a legal owner or corporate officer.

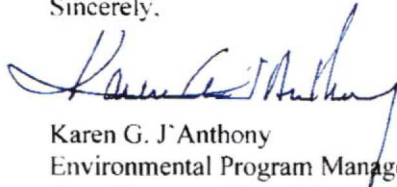
The requested information must be submitted to the CAPS within five (5) days of your receipt of this Notice of Deficiency. Failure to respond will result in the CAPS being unable to continue the review of the submitted permit application and the non-refund of the application processing fee. Please be aware that transportation of hazardous waste into, out of, or through Delaware without a permit is a violation of 7 Del.C. Chapters 60 and 63 and is subject to enforcement.

Please submit the required information to:

DaQuan L. Davis  
Delaware Department of Natural Resources and Environmental Control  
Solid and Hazardous Waste Management Section  
89 Kings Highway  
Dover, Delaware 19901

If you have any questions regarding this Notice of Deficiency, please contact Mr. Davis at (302) 739-9403.

Sincerely,



Karen G. J. Anthony  
Environmental Program Manager II  
Compliance and Permitting Section



STATE OF DELAWARE  
DEPARTMENT OF NATURAL RESOURCES  
AND ENVIRONMENTAL CONTROL  
DIVISION OF WASTE AND HAZARDOUS SUBSTANCES  
COMPLIANCE AND PERMITTING SECTION

89 KINGS HIGHWAY  
DOVER, DELAWARE 19901

TELEPHONE: (302) 739-9403  
FAX: (302) 739-5060

### HAZARDOUS WASTE TRANSPORTER PERMIT APPLICATION

**Instructions:** You must complete this application in its entirety and attach all applicable documentation.

(**Note:** For applicants renewing an existing permit, this application requires the submission of updated information and documentation.)

The application must be signed by the company owner or a corporate officer. A check payable to the "State of Delaware" must accompany this application.

Delaware Department of Natural Resources and Environmental Control  
Compliance and Permitting Section  
89 Kings Highway  
Dover, DE 19901

#### 1. Type of Permit

- New – Submit a check or money order, payable to the "State of Delaware," in the amount of \$350.00.
- Renewal: Permit # DE-HW- \_\_\_\_\_ Expiration Date \_\_\_\_\_

Please indicate the term for which you desire your permit to be issued. Submit a check or money order, payable to the "State of Delaware," for the indicated permit fee.

- One Year - \$350.00
- Two Years - \$650.00
- Three Years - \$950.00
- Four Years - \$1250.00
- Five Years - \$1550.00

#### 2. Release to Public:

Do you wish to be included on the list of transporters that is provided to persons requesting a list of Delaware permitted hazardous waste transporters?  Yes  No

**3. Company Information:**

Company Name: Ironclad Environmental Solutions, Inc

Location Address:	Mailing Address:
	4888 Suite 440, Houston, TX 77081

Contact Person: Kimberly Reoh Title: Director

Business Phone: 9208502483 Fax: \_\_\_\_\_

E-mail: kreoh@necssolutions.com 24 hr. Emergency Phone: 9208502483

EPA Identification Number: TXR000079368

Employer's Federal Tax ID Number: 870795847

**4. Type of Company: (Check One)**

- Proprietorship
- Partnership
- Corporation – City, State and Date of Incorporation: Delaware 1-23-2007
- Municipality
- Public Institution
- Other – Explanation: \_\_\_\_\_

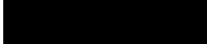
**5. Parent Company Information:**

Parent Company Name: Gulf Tanks Holdings, Inc.

Parent Company Address: 1650 East Fwy  
Baytown, TX 77521

**6. Ownership/Stockholder Information:**

For each owner, partner, or corporate officer, list the name, title, home address, and date of birth.

List of owners, partners, or corporate officers: Attachment Eric John, CEO 

List the name and address of all stockholders owning greater than 5% outstanding shares.

List of stockholders: Attachment \_\_\_\_\_

Not Applicable

**7. Company Affiliations:**

List all other companies owned by the same owners, corporate officers, or parent company that are engaged in the business of solid or hazardous waste transportation, treatment, storage, disposal, recovery, or reclamation.

- List of company affiliates: Attachment \_\_\_\_\_  
 No company affiliates

**8. Type of Hazardous Waste to be Transported:**

Indicate the waste types to be transported. (Note: Characteristic and listed hazardous wastes identified in Delaware's *Regulations Governing Hazardous Waste* (DRGHW) Part 261 are equivalent to RCRA 40 CFR Part 261 wastes.) Check all that apply.

- Part 261 characteristic or listed hazardous wastes  
 Used or waste oils (as defined by Part 279, Used Oil Management Standards)  
 Spent antifreeze exhibiting a characteristic of hazardous waste  
 PCB-contaminated hazardous waste  
 Spent fluorescent lighting tubes and ballasts when managed as non-universal waste

**9. Treatment, Storage, and Disposal Facilities:**

List all treatment, storage, and disposal facilities that have agreed to accept the hazardous wastes identified above.

- List of treatment, storage, and disposal facilities: Attachment Attached

**10. Other Transporter Permits:**

List all hazardous waste transporter permits held in other states.

- List of transporter permits: Attachment Attached  
 No hazardous waste transporter permits held in other states

**11. Federal DOT and Motor Carrier Numbers:**

Indicate your Federal DOT number and Motor Carrier number:

DOT# 1624598 MC# 00657559

**12. Proof of Insurance:**

The transporter identified in this application must meet or exceed minimum insurance requirements as set forth in DOT Title 49 CFR Part 387. The DNREC Compliance and Permitting Section must be identified as the certificate holder. Also include a current MCS-90 endorsement or affirmation that the endorsement is still in effect.

- Certificate of insurance and MCS-90: Attachment Attached



**13. Spill Control and Safety Equipment:**

List all spill control and safety equipment that will be carried on each vehicle.

List of spill control and safety equipment: Attachment Attached

**14. Spill Control Plan:**

Attach a copy of the Spill Control Plan that describes prevention, containment, and clean up procedures during transportation. The plan must demonstrate compliance with the requirements outlined in DRGHW Sections 263.30, 263.31, and 263.105. **Spill Control Plans must contain the following Delaware Emergency Reporting Telephone Numbers: 1-800-662-8802 and 302-739-9401.**

Spill Control Plan: Attachment Sec 1-3

**15. Driver Training:**

Attach a copy of your driver training program. All drivers must be trained in current DOT Motor Carrier Safety Regulations and have knowledge of the proper handling procedures for the type of waste transported, the hazardous waste manifest system, and safe vehicle operation as provided in 49 CFR Parts 383, 390 – 399, and DRGHW Section 263.104. All drivers must be familiar with the approved Spill Control Plan.

Driver Training Program: Attachment Sec 4

**16. Controlled Substance Testing:**

Do you maintain a controlled substance testing program for drivers in your employment (including contract drivers) in compliance with Federal DOT 49 CFR Part 391?

Yes

No, Explain:

**17. Vehicle Identification Information:**

List all vehicles to be used for the transportation of hazardous waste into, out of, or through Delaware. You may use the form provided or another printout that contains all required information.

Vehicle Identification Information: Attachment Attached



**Ironclad Environmental Solutions, Inc.**

**SPILL CONTINGENCY PLAN  
HAZARDOUS WASTE / USED OIL TRANSPORT**

I. **EMERGENCY ACTION:** In the event of an on-the-road spill or other emergency, the driver will follow these procedures:

A. Remain with the unit and warn all pedestrians and motorists to stay away from the spill area, pointing out to them the danger involved, and call the police / 911 or have someone call the police / 911.

B. Upon the arrival of the police or fire department, the driver will inform them of what kind of material has been spilled, hand them the manifest/paperwork if possible and request the area to be blocked off to both pedestrians and vehicles to prevent property damage or any serious personal injury.

The driver will request the first responder, fire or police personnel, to protect the area while the driver reports to a facility Branch Manager/Emergency Coordinator (listed below in the order of calling):

**Branch Manager/ Emergency Coordinator**

Name: Samuel Roberts  
Phone number: [REDACTED]

**Corporate Safety Manager**

Name: Aimee Wilson  
Phone Number: [REDACTED]

**Regional Vice President**

Name: Chad Kruger  
Phone Number: [REDACTED]

- A. The Branch Manager/Emergency Coordinator will gather the following information from the driver and relay it to the National Response Center, and if required our 24/7 spill response partner ERTS at (888) 585-5028.
1. Name of person reporting the incident.
  2. Name, address, and Identification Number of the transporter.
  3. Phone number where person reporting can be reached.
  4. Date, time, and location of the incident.
  5. The extent of injuries, if any.
  6. Classification, name, and quantity of hazardous materials/wastes involved, if such information is available.
  7. Type of incident and nature of hazardous material/waste involvement and

whether a continuing danger exists at the scene.

8. For each waste product involved provide:

- a. Name and Identification Number of generator.
- b. Product shipping, hazardous class, and UN or NA Number.
- c. Estimated quantity of material spilled.
- d. If possible, estimate the extent of contamination to land, water, or air.

9. Shipping name, hazard class, and Identification Number of any other material carried.

EMERGENCY RESPONSE AGENCIES:

<u>AGENCY</u>	<u>TOLL FREE NUMBER</u>	<u>REGULAR NUMBER</u>
U.S. National Response Center	(800) 424-8802	(202) 426-2675
Alabama Emergency Management Agency		(302) 659-3362
Hazardous Materials/Waste Incidents	(800) 843-0699	
U.S. Coast Guard, Lewes	(800) 424-9300	(302) 644-1909
CHEMTREC		
<u>ERTS</u>	(888) 585-5028	
Delaware Emergency Reporting	800-662-8802/ 302-739-9401	

D. Specific actions to be taken at the scene of the spill are:

I. Containment - The critical problem is to prevent the escape of any spilled liquid or solid into the ground or into a storm or sanitary sewer. A barrier must be erected immediately to prevent escape of spilled materials/waste liquids, using whatever material is at hand, even a dirt curb to prevent spreading of the spill. Containment of solids will be dependent on wind and weather conditions. Use the box tarp in the vehicle, or plastic visqueen if conditions are wet and windy. Simultaneously, the source of the spill or leak must be located and controlled (e.g., box hole plugged or taped or container turned right-side up).

The possibility of evacuation should be considered in the event of a major spill (e.g., a collision with another vehicle or a loaded trailer that has turned over, with subsequent container(s) rupturing). Major concerns involve ignitable wastes that may catch fire and possibly explode or generate toxic fumes. If fire threatens or actually occurs, personnel should be evacuated a distance of at least a half-mile as recommended by the Emergency Response Guidebook. If no fire threatens, and no container (s) have ruptured, a distance of 50-100 feet should suffice.

If the shipping description is known (refer to the manifest) find the name in your Emergency Response Guidebook in the blue pages and turn to the Corresponding Guide Number (orange top page-last 1/3 of book). If the shipping description is not known check the placard on the vehicle for a "UN" or a "NA" number, look up

the number in the yellow pages and refer to the Corresponding Guide Number, or contact the generator of the waste for safety data.

2. **Cleanup** - With containment effected and the spillage source controlled, cleanup is the next step. If the spill is contained on an impervious paved surface, material should be absorbed onto a compatible material (e.g., sand, diatomaceous earth). Any of a number of commercial absorbent inert materials may be used, but make sure they are compatible with the waste and will not cause a reaction. If the spillage has reached soil, all contaminated dirt should be collected into drums or bags for disposal at an EPA approved site.

If any spilled waste has reached the ground, the contaminated soil will be removed. The extent of contamination will be determined by sampling the spill area. A qualified laboratory will analyze the sample. Sampling techniques, chain-of-custody requirements, and analytical methods will follow approved procedures such as those outlined in SW-846 (Test Methods for Evaluating Solid Waste: Physical/Chemical Methods Compendium). Any soil exhibiting contamination above the local background level will be removed to an appropriate permitted disposal site.

In addition to contaminated absorbents, dirt, or the like as noted above, damaged containers also present a disposal problem. Special "recovery drums" (oversize metal drums) will be used for containing damaged 55-gallon drums. Disposal will be at an approved site.

II. **EMERGENCY EQUIPMENT:** Each tractor or trailer carries the following emergency equipment:

- Gloves
- Goggles
- Slicker Suite
- Oil Absorbing Socks & Pads
- Boots
- DOT Emergency Response Guidebook
- Emergency Reflective Triangles (3)
- Flares
- ABC Fire Extinguisher

III. **FOLLOW-UP PROCEDURES:** Two steps remain once the immediate emergency aspects of a spill have been taken care of:

A. *Decontamination:*

Trucks or trailers exposed to a spill or leak will be decontaminated at the site in order to prevent any further release to the extent that it can be transported (or move under its own power) to an authorized facility capable of further decontamination if necessary.

Equipment - Each item used will be placed in an open head container and thoroughly rinsed with a compatible solvent or cleaning compound. The residue or wash water will then be drained into a tight head container, sealed, and disposed of in accordance with Federal and State Regulations at an authorized disposal site.

Clothing - Contaminated clothing will be placed with the clean up residue and disposed of in accordance with Federal and State Regulations at an authorized disposal site. If clothing is reusable, then it will be decontaminated properly and the residue added to the other waste.

B. *Notification:* The Department of Transportation, Director of Hazardous Materials Registration, Materials and Transportation Bureau, Washington, DC 20590 will be notified, in writing, of the occurrence, and nature of the incident.

**IV. TRAINING PROGRAM:** In preparation for handling hazardous materials and hazardous wastes, all drivers and response personnel receive approximately two (2) hours classroom training followed by refresher training by local management at regular scheduled (at least monthly) safety tailgate meetings. In addition to the above, an annual meeting is held to educate further each Branch Manager on changes in regulations.

A. The following is a list of classroom training provided to all branch personnel responsible for the handling and transportation of hazardous waste:

1. RCRA Hazardous Waste Manifesting
2. Container Receiving and Maintenance
3. Container Inspections
4. Container Transferring
5. Container Pickup Checklist
6. Re-use of Containers for Hazardous Waste
7. Emergency Response Equipment
8. Emergency Procedures
9. Hazardous Waste Labeling
10. Emergency Spills

B. Since much of the drivers' actions involve hazardous materials, including hazardous wastes, their instructions specifically include:

1. Inspection of their vehicles before and during trips;
2. Driving Rules;
3. Knowledge of safety and health hazards of products carried (e.g., flammable, and corrosive); and
4. Actions to be implemented in case of spills, accidents, or other emergencies involving hazardous materials and hazardous wastes.

BRANCH	TRUCK#	YEAR	MAKE	MODEL	TYPE	VIN#	COLOR	PLATE#	STATE	GVWR	OWNER
1380	MD598	2015	KENWORTH	T800	WINCH TRACTOR	1XKDD49X5FJ435598	RED	3593223	IN	80000	Ironclad Environmental Solutions
1380	MD215	2008	MACK	CV713	ROLL OFF TRUCK	1M2AG11C67M063424	RED	359222	IN	80000	Ironclad Environmental Solutions
1380	MT2401	2024	MACK	GRANITE	ROLL OFF TRUCK	1M2GR2GC6RM042173	WHITE	3614236	IN	66000	Ironclad Environmental Solutions
1380	MT2430	2025	KENWORTH	T800	ROLL OFF TRUCK	1NKDL40X9SR111981	WHITE	3643130	IN	53250	Ironclad Environmental Solutions
1900	VA167	2013	KENWORTH	T800	WINCH TRACTOR	1XKDD49X0DJ362539	RED	3593275	IN	80000	Ironclad Environmental Solutions



CT	HAZARDOUS WASTE HAULER	ACTIVE	CTHW954	6/29/2027
NY	SOLID WASTE/HAZARDOUS	ACTIVE	7A-936	6/10/2025
WI	HAZARDOUS	ACTIVE	16833	9/29/2024
SC	HAZARDOUS	ACTIVE	TXR000079368	8/19/2027

HAZ DROP SITES

WM DRPI landfill 198 Marsh Ln, New Castle, DE 19720 866-909-4458

Sandtown Landfill 1107 willow grove rd, Felton De 19943

Reworld Delaware valley 10 Highland Chester pa 19013

CHRISTI CRADDICK, CHAIRMAN  
WAYNE CHRISTIAN, COMMISSIONER  
JIM WRIGHT, COMMISSIONER



DANNY SORRELLS  
ASSISTANT EXECUTIVE DIRECTOR  
DIRECTOR, OIL AND GAS DIVISION

RAILROAD COMMISSION OF TEXAS

OIL AND GAS DIVISION  
1/17/2024

Ironclad Environmental Solutions, Inc.  
4888 Loop Central Drive  
STE 440  
Houston, Texas 77081

RE: Operator No. 101058

Dear Ironclad Environmental Solutions, Inc.,

The above listed new operator number is assigned to your organization name as filed on the Organization Report (Form P-5). Where applicable, this operator number should be used on future filings, forms and correspondence with the Commission.

Please verify the name and address listed above and notify us if there are any discrepancies. It is important that we agree on the exact spelling of your name (even the punctuation and spaces) so that the processing of your forms will not be delayed.

Subsequent refiling of the Form P-5 may be necessary on an annual basis, at which time you will receive notification from us. If there is a change in the required information as reported on Form P-5, please file an amended report showing the corrections.

**New Operator Instructions:**

In June 2021, RRC implemented a new process for gaining access to LoneSTAR. Users now log into LoneSTAR via RAMP.

If you would like to become an Administrator for your Organization, please follow the steps below to submit a SAFE form:

1. Proceed to <https://ramp.rrc.texas.gov/#/safe>
2. For "Company exists in RAMP?", choose "Yes".
3. Keep "Select Company Type" as the first choice: Oil & Gas/Pipelines/Gas Utility
4. Enter in your Approved Company name
5. For "RRC Organization Identifier" enter in your newly approved P5 number
6. Fill out the rest of the form with your email, name, and telephone number
7. Accept the terms and sign the form
8. Click "Sign Up"

You will receive an email once your request has been either accepted or rejected by an RRC Admin.

If you have any questions, please contact the RRC Help Desk at [rrconline-security@rrc.texas.gov](mailto:rrconline-security@rrc.texas.gov).

Sincerely,

P-5 Financial Assurance Unit



# CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

06/05/2024

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

**IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).**


<b>PRODUCER</b> Ironwood, a Marsh & McLennan Agency, LLC Co 4401 Northside Parkway NW Suite 800 Atlanta GA 30327		<b>CONTACT NAME:</b> Laura Jones <b>PHONE (A/C, No, Ext):</b> (404) 927-9143 <b>FAX (A/C, No):</b> (404)503-9101 <b>E-MAIL ADDRESS:</b> ljones@ironwoodins.com																						
<b>INSURED</b> Ironclad Environmental Solutions, Inc. 4888 Loop Central Drive, Suite 440 Houston TX 77081		<table border="1"> <thead> <tr> <th colspan="2">INSURER(S) AFFORDING COVERAGE</th> <th>NAIC #</th> </tr> </thead> <tbody> <tr> <td>INSURER A:</td> <td>Axis Surplus Insurance Company</td> <td>26620</td> </tr> <tr> <td>INSURER B:</td> <td>Hartford Insurance</td> <td>19682</td> </tr> <tr> <td>INSURER C:</td> <td>Bridgeway Insurance Company</td> <td>12489</td> </tr> <tr> <td>INSURER D:</td> <td>SiriusPoint Specialty Insurance</td> <td>16820</td> </tr> <tr> <td>INSURER E:</td> <td>Axis Surplus Insurance</td> <td>26620</td> </tr> <tr> <td>INSURER F:</td> <td></td> <td></td> </tr> </tbody> </table>		INSURER(S) AFFORDING COVERAGE		NAIC #	INSURER A:	Axis Surplus Insurance Company	26620	INSURER B:	Hartford Insurance	19682	INSURER C:	Bridgeway Insurance Company	12489	INSURER D:	SiriusPoint Specialty Insurance	16820	INSURER E:	Axis Surplus Insurance	26620	INSURER F:		
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**COVERAGES**      **CERTIFICATE NUMBER:** CL2310449037      **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR  GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input checked="" type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC OTHER:			MP005964-01-2023	09/30/2023	09/30/2024	EACH OCCURRENCE \$ 1,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 100,000 MED EXP (Any one person) \$ 25,000 PERSONAL & ADV INJURY \$ 1,000,000 GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COMP/OP AGG \$ 2,000,000 Contractors Pollution \$ 1,000,000
B	<input checked="" type="checkbox"/> AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO <input type="checkbox"/> OWNED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS ONLY <input type="checkbox"/> NON-OWNED AUTOS ONLY <input type="checkbox"/> AUTOS ONLY			20CSES81701	09/30/2023	09/30/2024	COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ Medical payments \$ 5,000
C	<input checked="" type="checkbox"/> UMBRELLA LIAB <input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DED    RETENTION \$			8EA7XL000225301	09/30/2023	09/30/2024	EACH OCCURRENCE \$ 5,000,000 AGGREGATE \$ 5,000,000
B	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N	N/A	20WNS81700	09/30/2023	09/30/2024	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTH-ER E.L. EACH ACCIDENT \$ 1,000,000 E.L. DISEASE - EA EMPLOYEE \$ 1,000,000 E.L. DISEASE - POLICY LIMIT \$ 1,000,000
D	Excess Liability			TSX00020323	09/30/2023	09/30/2024	Each Occurrence 5,000,000 Aggregate 5,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

<b>CERTIFICATE HOLDER</b>  Delaware Department of Natural Resource and Environmental Control 89 Kings Highway  Dover DE 19901	<b>CANCELLATION</b>  SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.  AUTHORIZED REPRESENTATIVE  
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AGENCY CUSTOMER ID: \_\_\_\_\_

LOC #: \_\_\_\_\_



### ADDITIONAL REMARKS SCHEDULE

Page \_\_\_\_ of \_\_\_\_

AGENCY Ironwood, a Marsh & McLennan Agency, LLC Co		NAMED INSURED Ironclad Environmental Solutions, Inc.	
POLICY NUMBER			
CARRIER	NAIC CODE	EFFECTIVE DATE:	

**ADDITIONAL REMARKS**

**THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM,**  
**FORM NUMBER:** 25      **FORM TITLE:** Certificate of Liability Insurance: Notes

Excess General Liability/Pollution Liability  
Axis Surplus Insurance Company  
Policy # MX005965-01-2023  
Effective 9/30/2023 to 9/30/2024  
\$10,000,000 Occurrence  
\$10,000,000 Aggregate

Cyber Liability  
Certain Underwriters at Lloyd's London and other insurers  
Policy # ACS1241424  
Effective 4/1/2024- 4/1/2025  
\$5,000,000 Limit

Additional Named Insureds:

1. Ironhorse Parent, LP
2. Ironhorse Intermediate, LLC
3. Ironhorse Purchaser, LLC
4. Gulf Tanks Holdings, Inc.
5. Water Movers Contracting, LLC
6. Adler Tank Rentals, LLC
7. DenBeste Water Solutions, LLC
8. DenBeste Transportation, LLC

USDOT Number: 1624598 Date Received: 9/30/2023

Please note, the expiration date as stated on this form relates to the process for renewing the Information Collection Request for this form with the Office of Management and Budget. This requirement to collect information as requested on this form does not expire. For questions, please contact the Office of Registration and Safety Information, Registration, Licensing, and Insurance Division.

A Federal Agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2126-0008. Public reporting for this collection of information is estimated to be approximately 2 minutes per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, Federal Motor Carrier Safety Administration, MC-RRA, Washington, D.C. 20590.



Endorsement for Motor Carrier Policies of Insurance for Public Liability under Sections 29 and 30 of the Motor Carrier Act of 1980

FORM MCS-90

Issued to Gulf Tanks Holdings, Inc of Texas (Motor Carrier name) (Motor Carrier state or province)

Dated at 12:00 midr on this 30th day of September, 2023

Amending Policy Number: 8E-A7-XL-0002253-01 Effective Date: 09/30/2023

Name of Insurance Company: The Bridgeway Insurance Co

Countersigned by: (authorized company representative)

The policy to which this endorsement is attached provides primary or excess insurance, as indicated for the limits shown (check only one):

- This insurance is primary and the company shall not be liable for amounts in excess of \$ for each accident.
This insurance is excess and the company shall not be liable for amounts in excess of \$ 5,000,000.00 for each accident in excess of the underlying limit of \$ 1,000,000.00 for each accident.

Whenever required by the Federal Motor Carrier Safety Administration (FMCSA), the company agrees to furnish the FMCSA a duplicate of said policy and all its endorsements. The company also agrees, upon telephone request by an authorized representative of the FMCSA, to verify that the policy is in force as of a particular date. The telephone number to call is: 347-344-7037.

Cancellation of this endorsement may be effected by the company or the insured by giving (1) thirty-five (35) days notice in writing to the other party (said 35 days notice to commence from the date the notice is mailed, proof of mailing shall be sufficient proof of notice), and (2) if the insured is subject to the FMCSA's registration requirements under 49 U.S.C. 13901, by providing thirty (30) days notice to the FMCSA (said 30 days notice to commence from the date the notice is received by the FMCSA at its office in Washington, DC).

Filings must be transmitted online via the Internet at http://www.fmcsa.dot.gov/urs.

(continued on next page)

USDOT Number: 1624598 Date Received: \_\_\_\_\_

Please note, the expiration date as stated on this form relates to the process for renewing the Information Collection Request for this form with the Office of Management and Budget. his requirement to collect information as requested on this form does not expire. For questions, please contact the Office of Registration, Registration Division.

A Federal Agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2126-0008. Public reporting for this collection of information is estimated to be approximately 2 minutes per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, Federal Motor Carrier Safety Administration, MC-RRA, Washington, D.C. 20590.



Endorsement for Motor Carrier Policies of Insurance for Public Liability under Sections 29 and 30 of the Motor Carrier Act of 1980

FORM MCS-90

Issued to IRONCLAD ENVIRONMENTAL SOLUTIONS, INC. of BAYTOWN, TX (Motor Carrier name) (Motor Carrier state or province)

Dated at HARTFORD, CT on this 30TH day of SEPTEMBER, 2023

Amending Policy Number: 20 CSE S81701 Effective Date: 09/30/2023

Name of Insurance Company: HARTFORD FIRE INSURANCE COMPANY

Countersigned by: Susan L. Castaneda (authorized company representative)

The policy to which this endorsement is attached provides primary or excess insurance, as indicated for the limits shown (check only one):

- This insurance is primary and the company shall not be liable for amounts in excess of \$ 1,000,000 for each accident.
This insurance is excess and the company shall not be liable for amounts in excess of \$ for each accident in excess of the underlying limit of \$ for each accident.

Whenever required by the Federal Motor Carrier Safety Administration (FMCSA), the company agrees to furnish the FMCSA a duplicate of said policy and all its endorsements. The company also agrees, upon telephone request by an authorized representative of the FMCSA, to verify that the policy is in force as of a particular date. The telephone number to call is: (860) 547-5000.

Cancellation of this endorsement may be effected by the company or the insured by giving (1) thirty-five (35) days notice in writing to the other party (said 35 days notice to commence from the date the notice is mailed, proof of mailing shall be sufficient proof of notice), and (2) if the insured is subject to the FMCSA's registration requirements under 49 U.S.C. 13901, by providing thirty (30) days notice to the FMCSA (said 30 days notice to commence from the date the notice is received by the FMCSA at its office in Washington, DC).

Filings must be transmitted online via the Internet at https://portal.fmcsa.dot.gov/UrsRegistrationWizard/.

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## DEFINITIONS AS USED IN THIS ENDORSEMENT

**Accident** includes continuous or repeated exposure to conditions or which results in bodily injury, property damage, or environmental damage which the insured neither expected nor intended.

**Motor Vehicle** means a land vehicle, machine, truck, tractor, trailer, or semitrailer propelled or drawn by mechanical power and used on a highway for transporting property, or any combination thereof.

**Bodily Injury** means injury to the body, sickness, or disease to any person, including death resulting from any of these.

**Property Damage** means damage to or loss of use of tangible property.

**Environmental Restoration** means restitution for the loss, damage, or destruction of natural resources arising out of the accidental discharge, dispersal, release or escape into or upon the land, atmosphere, watercourse, or body of water, of any commodity transported by a motor carrier. This shall include the cost of removal and the cost of necessary measures taken to minimize or mitigate damage to human health, the natural environment, fish, shellfish, and wildlife.

**Public Liability** means liability for bodily injury, property damage, and environmental restoration.

The insurance policy to which this endorsement is attached provides automobile liability insurance and is amended to assure compliance by the insured, within the limits stated herein, as a motor carrier of property, with Sections 29 and 30 of the Motor Carrier Act of 1980 and the rules and regulations of the Federal Motor Carrier Safety Administration (FMCSA).

In consideration of the premium stated in the policy to which this endorsement is attached, the insurer (the company) agrees to pay, within the limits of liability described herein, any final judgment recovered against the insured for public liability resulting from negligence in the operation, maintenance or use of motor vehicles subject to the financial responsibility requirements of Sections 29 and 30 of the Motor Carrier Act of 1980 regardless of whether or not each motor vehicle is specifically described in the policy and whether or not such negligence occurs on any route or in any territory authorized to be served by the insured or elsewhere. Such insurance as is afforded, for public liability, does not apply to injury to or death of the insured's employees while engaged in the course of their employment, or property transported by the insured, designated as cargo. It is understood and agreed that no condition, provision, stipulation, or limitation contained in the policy, this endorsement, or any other endorsement thereon,

or violation thereof, shall relieve the company from liability or from the payment of any final judgment, within the limits of liability herein described, irrespective of the financial condition, insolvency or bankruptcy of the insured. However, all terms, conditions, and limitations in the policy to which the endorsement is attached shall remain in full force and effect as binding between the insured and the company. The insured agrees to reimburse the company for any payment made by the company on account of any accident, claim, or suit involving a breach of the terms of the policy, and for any payment that the company would not have been obligated to make under the provisions of the policy except for the agreement contained in this endorsement.

It is further understood and agreed that, upon failure of the company to pay any final judgment recovered against the insured as provided herein, the judgment creditor may maintain an action in any court of competent jurisdiction against the company to compel such payment.

The limits of the company's liability for the amounts prescribed in this endorsement apply separately to each accident and any payment under the policy because of anyone accident shall not operate to reduce the liability of the company for the payment of final judgments resulting from any other accident.

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<b>SCHEDULE OF LIMITS — PUBLIC LIABILITY</b>
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Type of carriage	Commodity transported	January 1, 1985
(1) For-hire (in interstate or foreign commerce, with a gross vehicle weight rating of 10,001 or more pounds).	Property (nonhazardous)	\$750,000
(2) For-hire and Private (in interstate, foreign, or intrastate commerce, with a gross vehicle weight rating of 10,001 or more pounds).	Hazardous substances, as defined in <a href="#">49 CFR 171.8</a> , transported in cargo tanks, portable tanks, or hopper-type vehicles with capacities in excess of 3,500 water gallons; or in bulk Division 1.1, 1.2, and 1.3 materials, Division 2.3, Hazard Zone A, or Division 6.1, Packing Group I, Hazard Zone A material; in bulk Division 2.1 or 2.2; or highway route controlled quantities of a Class 7 material, as defined in <a href="#">49 CFR 173.403</a> .	\$5,000,000
(3) For-hire and Private (in interstate or foreign commerce, in any quantity; or in intrastate commerce, in bulk only; with a gross vehicle weight rating of 10,001 or more pounds).	Oil listed in <a href="#">49 CFR 172.101</a> ; hazardous waste, hazardous materials, and hazardous substances defined in <a href="#">49 CFR 171.8</a> and listed in <a href="#">49 CFR 172.101</a> , but not mentioned in (2) above or (4) below.	\$1,000,000
(4) For-hire and Private (In interstate or foreign commerce, with a gross vehicle weight rating of less than 10,001 pounds).	Any quantity of Division 1.1, 1.2, or 1.3 material; any quantity of a Division 2.3, Hazard Zone A, or Division 6.1, Packing Group I, Hazard Zone A material; or highway route controlled quantities of a Class 7 material as defined in <a href="#">49 CFR 173.403</a> .	\$5,000,000

\*The schedule of limits shown does not provide coverage. The limits shown in the schedule are for information purposes only.