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DNREC - WHS

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- 0597 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?

Delaware Hazardous Waste Transporters Permit Application Page 2 of 5

3. Company Information:

	Company Name: Ecology Services, Inc.	
	Location Address:	Mailing Address:
	3520 Fairfield Road	
	5520 I annelu Road	9135 Guilford Road, Suite 200
	Baltimore, MD 21226	Columbia, MD 21046
	Contact Person: Michele Patterson	Title: Brokerage Operations Manager
	Business Phone: 865-766-5873	Fax: 865-766-5908
	E-mail: mpatterson@ecologyservices.com	24 hr. Emergency Phone:
	EPA Identification Number: MDR000524701	
	Employer's Federal Tax ID Number: 52-1633980	* ·
4.	Type of Company: (Check One)	A.
	☐ Proprietorship ☐ Partnership ☐ Corporation – City, State and Date of Incorporation ☐ Municipality	n: Baltimore, MD 1989
	☐ Public Institution ☐ Other – Explanation:	*
5.	Parent Company Information:	
6.	Ownership/Stockholder Information:	
	For each owner, partner, or corporate officer, list the n	ame, title, home address, and date of birth.
	☑ List of owners, partners, or corporate officers: Atta	achment A
	List the name and address of all stockholders owning g	greater than 5% outstanding shares.
	✓ List of stockholders: Attachment A Not Applicable	

Delaware Hazardous Waste Transporters Permit Application Page 3 of 5 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 A ☐ 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 B 10. Other Transporter Permits: List all hazardous waste transporter permits held in other states. List of transporter permits: Attachment C ☐ 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: MC# 1057090 DOT# 779901

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.

✓ Certi	ficate of insurance and MCS-90: Attachmen	nt D
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Delaware Hazardous Waste Transporters Permit Application Page 4 of 5
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 E
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 F
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 <u>G</u>
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:
ino, 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 H

Delaware Hazardous Waste Transporters Permit Application Page 5 of 5

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.

	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 familian this application and all attachments, and that upon personal knowledge and true, accurate and complete. I am aware that there are significant penalties to	d information, the information is
	Signature of legal owner or corporate officer	1/2-12-
	Peter F. Osborne	2/20/25
	Printed Name	Date
	Owner/CEO	
	Title	

HW Application.doc Revised December 3, 2020

Ecology Services, Inc. Corporate Officers

1. Peter Osborne - CEO



2. Timothy Osborne-Chairman



Ecology Services, Inc. Stockholders

1. Peter Osborne - CEO



2. Timothy Osborne-Chairman



Company Affiliations

1. ESRR LLC - Ecology Services Refuse and Recycling

Ecology Services, Inc Treatment, Storage and Disposal Facilities

- Energy Solutions (formerly Duratek)
 1560 Bear Creek Rd
 Oak Ridge, TN 37830
 (865) 220-1628
- Diversified Scientific Services 657 Gallaher Rd Kingston, TN 37763 (865) 813-1317
- Perma-Fix of Florida 1940 NW 67th Place Gainesville, FL 32653 (352) 373-6066
- NSSI Recover Services
 5711 Etheridge Street
 Houston, TX 77087
 (713) 641-0391
- Waste Control Specialists 9998 W. State Hwy 176 Andrews, TX 79714 (888) 789-2783
- 6. Energy Solutions Clive, UT 801-649-201
- Toxco Materials Management Center 109 Flint Rd Oak Ridge, TN 37830 865-482-5532

Ecology Services, Inc Hazardous Waste Transporter Permits

State	Permit Number
California HW Transporter Registration	6419
Connecticut HW Transporter Permit	CT-HW-858
Florida HW Transporter Permit	MDR000524701
Illinois	SWH Permit #5276
Kansas	MDR000524701
	HWH 706
Maryland	SMH 123
Michigan – Alliance Uniform HW Permit	UPW-779901-WV
Nevada – Alliance Uniform HW Permit	UPW-779901-WV
North Carolina	MDR000524712
Ohio	MDR000524712
Oklahoma – Alliance Uniform HW Permit	UPW-779901-WV
Pennsylvania	PA-AH0789
South Carolina	MDR000524701
Tennessee HW Transporter Permit	MDR000524701
Texas	95469/MDR000524712
Virginia	MDR000524712
West Virginia – Alliance Uniform HW Permit	UPW-779901-WV
Wisconsin	15493

Attachment D

DE DNREC Hazardous Waste Transporter DE-HW-0597
Permit Renewal Application

Ecology Services, Inc.
Certificate of Insurance and MCS-90



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY) 01/30/2025

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(les) 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

PRODUCER		CONTACT Rachel Halterman	
Hilb Group of NJ, LLC - Martens Johnson			881-1137
6227 Executive Blvd		E-MAIL rhalterman@hilbgroup.com	
		INSURER(S) AFFORDING COVERAGE	NAIC #
Rockville	MD 20852	INSURER A: Great Divide Insurance Co	25224
INSURED		INSURER B: Key Risk Insurance Company	10885
Ecology Services, Inc.		INSURER C: AXIS Surplus Insurance Company	26620
9135 Guilford Road, Suite #200		INSURER D: Chesapeake Employers' Insurance Company	11039
		INSURER E: Navigators Specialty Insurance Co	36056
Columbia	MD 21046	INSURER F:	
COVERAGES CERTIFICAT	E NUMBER: 25-26 WC,	24-25 AOLs 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

CERT	IFICATE MAY BE ISSUED OR MAY PERTA USIONS AND CONDITIONS OF SUCH PO	AIN, THE IN	SURANCE AFFORDED BY TH	E POLICIES DESCRIBE	D HEREIN IS S		
INSR LTR	TYPE OF INSURANCE	ADDLISUBR		POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMIT	's
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A			GLPO1526992-23	07/11/2024	07/11/2025	PERSONAL & ADV INJURY	\$ 1,000,000 \$ 2,000,000
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c ×	UMBRELLA LIAB EXCESS LIAB CLAIMS-MADE DED RETENTION \$		P-001-000877327-03	07/11/2024	07/11/2025	EACH OCCURRENCE AGGREGATE	\$ 5,000,000 \$ 5,000,000
D AND OFF (Ma	RKERS COMPENSATION DEMPLOYERS' LIABILITY PROPRIETOR/PARTNER/EXECUTIVE ICCER/MEMBER EXCLUDED? Indatory In NH) Is, describe under SCRIPTION OF OPERATIONS below	N/A	8015888	02/01/2025	02/01/2026	PER STATUTE OTH- E.L. EACH ACCIDENT E.L. DISEASE - EA EMPLOYEE E.L. DISEASE - POLICY LIMIT	\$ 1,000,000 \$ 1,000,000 \$ 1,000,000
E Po	ollution Liability		NY24ECPX0076NC	07/11/2024	07/11/2025	Occurrence/Aggregate	\$10,000,000
DESCRIP'	TION OF OPERATIONS / LOCATIONS / VEHICLE	S (ACORD 1	01, Additional Remarks Schedule,	may be attached if more sp	ace is required)		
CERTIF	ICATE HOLDER			CANCELLATION			

Department of Natural Resources a	and Environmental Control	SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.
do fango ingamay		AUTHORIZED REPRESENTATIVE
Dover	DE 19901	A. Haltoma
		© 4000 2045 A CORD CORPORATION All rights reserved.

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POLICY CHANGES

Policy Change Number:

POLICY NUMBER BAP1526990-23	POLICY CHANGES EFFECTIVE 07/11/2024	COMPANY Key Risk Insurance Company
NAMED INSURED Ecology Services, Inc.		AUTHORIZED REPRESENTATIVE
COVERAGE PARTS AFFECTED Business Auto Coverage Form		
	CHANGES	
In consideration of no premium cha 05/26/2023 Endorsement for Motor		and agreed that for Endorsement #1, MCS-90 e is added to the policy.
	All other terms and conditions re	emain unchanged.

USDOT Number:	Date Received:
OSDOT RUMBOL.	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 Ecology Services, Inc. (Motor Carrier name)	of Maryland (Motor Carrier state or province)
Dated at 8:00 am on this 12th day of July	☑, 2024 ☑
Amending Policy Number: BAP1526990-23 Effective	ctive Date: <u>07/11/2024</u>
Name of Insurance Company: Key Risk Insurance Company	
Countersigned by:	uthorized 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.
O This insurance is excess and the company shall not be liable for amounts in underlying limit of \$for each accident.	excess of \$for each accident in excess of the
Whenever required by the Federal Motor Carrier Safety Administrati said policy and all its endorsements. The company also agrees, upor to verify that the policy is in force as of a particular date. The telepho	
Cancellation of this endorsement may be effected by the company of the other party (said 35 days notice to commence from the date the and (2) if the insured is subject to the FMCSA's registration requirem the FMCSA (said 30 days notice to commence from the date the not	notice is mailed, proof of mailing shall be sufficient proof of notice), ents under <u>49 U.S.C. 13901</u> , by providing thirty (30) days notice to

(continued on next page)

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

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.

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,

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.

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.

(continued on next page)

SCHEDULE OF LIMITS — PUBLIC LIABILITY

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 49 CFR 171.8, 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 49 CFR 173.403.	\$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 49 CFR 172.101; hazardous waste, hazardous materials, and hazardous substances defined in 49 CFR 171.8 and listed in 49 CFR 172.101, 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 49 CFR 173.403.	\$5,000,000

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

Ecology Services, Inc. Spill Control and Safety Equipment

Equipment name	Physical Description	Capabilities	Location
Two-way radio or cell phone		To be used as an effective means of communication	
Respirator	Full Face APR with Acid Gas/Organic Vapor/HEPA Cartridges	Protect respiratory system	
First aid kit with eyewash apparatus	Includes bandages, burn cream, antibiotic ointment, thermometer, gloves, adhesive tape, blanket, and gloves	Provide basic first aid in the event of an injury	
Flashlight	Battery operated	Assists in limited visibility situations	
Protective Clothing	Plain and Poly Coated Tyvex Suits, nitrile gloves, and rubber boots	Protects individual from potential hazards	All items will be located on the
Absorbent Material	Materials approved for the use with designated hazards (e.g. clay, rocks, pads)	Assists in containing spills	transport vehicle when hauling
Drums and containers	5 Gallon O/H Poly Pail & 85 Gallon Poly Overpack Drum	Used for the disposal of contaminated clean-up materials and supplies	HazMat.
Decontamination supplies	Simple Green, Radiac Wash, shovel, and plastic sheeting	Assists in clean-up of spill	
Radiation detection meters	Dose rate and contamination meters	In the event of a spill containing mixed waste, detects levels of radiation.	
U.S DOT Hazardou	s Materials Emergency Guidebook	Reference	*

All equipment shall be tested and maintained as necessary to assure its proper operation in time of an emergency. After an emergency, all equipment shall be decontaminated, cleaned and fit for its intended use before normal operations resume.

Prepared by: Ecology Services, Inc

Ecology Services, Inc Spill Control Plan

Spill Prevention

Spill Prevention procedures will be implemented through the use of Operation Methods in accordance with DRGHW Section 263.105 that encompasses the following:

- All vehicles will be operated and maintained in compliance with Federal and both Maryland and Delaware state regulations as to not present a hazard through unsafe vehicle conditions. Ecology Services, Inc (ESI) is responsible for all vehicles that will be transporting hazardous materials.
- 2. Safety and emergency equipment will be carried on all vehicles in accordance with applicable DOT regulations to ensure protection to human safety and the environment.
- 3. All vehicles will be equipped and operated to prevent leakage of wastes to the environment.
- 4. All vehicles will carry spill containment equipment to ensure adequate containment in the event of a release of the waste. (A list of equipment may be found in Attachment E)
- 5. ESI will not accept any hazardous waste from a generator or another transporter if:
 - a. Waste inventory does not match information contained on manifest
 - b. Waste containers are leaking or are damaged in a way that will allow leakage or otherwise pose a potential for release of the waste while in transit
 - c. Waste containers are not properly marked or labeled.
- 6. Before each shipment, ESI will ensure the following:
 - a. Transporting vehicle is visually inspected before leaving the facility
 - b. All waste containers have been inspected for proper labeling, placarding, and marking
 - c. Drums and containers are in good condition and have been accounted for
 - All drums have been properly secured to prevent load shift while in transit

Spill Response

All actions will be conducted with the understanding that any area affected by a spill must be restored to its original condition before the spill or take such action as may be required or approved by Federal, State, or local officials in order to ensure there is no hazard to human health or the environment.

Initial spill response

If a spill occurs, the first person on the scene will make great efforts to reduce threats to human health and the environment through the following procedures:

- 1. Determine if there is immediate danger:
 - a. If so, quickly leave the area using the fastest route possible
 - b. If not, identify material spilled and start the appropriate containment and safety procedures
- 2. Cut off source of spill and contain the flow, if possible
- 3. Reduce danger/threat to human life. For example, by removing ignition sources near flammable liquid spills, if possible, without further assistance
- 4. Notify emergency response coordinator or alternate coordinators

5. Utilize the spill kit or other appropriate materials, contain and clean up the spill. Obtain assistance of others, if necessary to contain and clean up the spill

Spill containment procedures

- 1. Find the source of spill and take action to stop the source.
- 2. Using spill absorbents or other suitable materials, construct a berm to prevent the spill from entering into storm drains, drainage ditches, etc.
- 3. Apply absorbent materials to contain and recover small amounts of spilled materials
- 4. Collect all spilled material and contaminated materials and store them in an appropriate container for disposal.

Emergency Reporting

In the event of a hazardous waste spill during transportation, ESI will immediately notify the Department of Natural Resources and Environmental Control and the National Response Center with the following information:

- 1. Name of the person reporting the incident
- 2. Name, address, and the EPA identification number of the transporter
- 3. Phone number where the person reporting the incident can be reached
- 4. Date, time and location of the incident
- 5. Mode of transportation and type of transport vehicle
- 6. A brief description of the incident, including the type of incident
- 7. For each waste involved in the spill:
 - a. The name and EPA identification number of the generator of the waste
 - b. Shipping name, hazard class and UN or NA number of the waste
 - c. Estimated quantity of the material or the waste spilled
 - d. The extent of the contamination of land, water, or air
- 8. Shipping name, hazard class, and the UN or NA number of any other material carried

In the event of an emergency or hazardous waste spill during transportation, Ecology Services, Inc will immediately notify the affected municipality of the occurrence and the nature of the spill.

Ecology Services, Inc will submit a report of the incident in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Dept. of Transportation, Washington, D.C 20590, and send copies of the report to the Department of Natural Resources & Environmental Control and generator.

List of Emergency Response Agencies

Delaware Emergency Reporting 1-800-662-8802 302-739-9401

National Response Center 800-424-8802 (24 hours) Delaware Local Police and Fire Departments 911

List of Emergency Coordinators

Paul Hickman

Office: 865-766-5873

Cell:

Michele Patterson

Office: 865-766-5873

Cell:

List of Emergency Response Contractors

Verisk-3E Company 1905 Aston Avenue Carlsbad, CA 92008 800-451-8346

Clean Harbors Environmental Services 42 Longwater Drive P.O. Box 9149 Norwell, MA 02061 800.282.0058

Attachment G

DE DNREC Hazardous Waste Transporter DE-HW-0597
Permit Renewal Application

Ecology Services, Inc.

Driver Training Program

Revision: 1 Page 1 of 8

Purpose

This procedure details how Ecology Services, Inc. (ESI) will comply with the requirements of 49 CFR 172 Subpart H – Training. It also details additional training that ESI brokerage personnel will receive to ensure that the requirements of the Environmental Protection Agency (EPA), the Nuclear Regulatory Commission (NRC), and various waste processing facilities and disposal sites are clearly understood and followed in a compliant manner.

2. Responsibilities

2.1 Manager of Brokerage Operations

The Manager of Brokerage Operations (Manager) reports to the Chief Executive Officer (CEO) of ESI and is responsible for the overall conduct and day-to-day operations of the brokerage group. The Manager will ensure that training is conducted at the prescribed frequency and in accordance with this procedure. The Manager will periodically assess these requirements to determine if they are adequate. The Manager will also ensure that all ESI brokerage personnel have adequate reference materials and resources so they can fully implement the training they have received. Additional training for individuals or the entire brokerage group may be recommended if observations indicate it is necessary.

3. Training Frequency

New brokerage personnel will be provided training within 90 days of accepting a position within the brokerage group. Prior to receiving training they must work under the direct supervision of someone who is fully trained.

Recurrent training will be conducted every three years.

ESI will additionally strive to conduct refresher training annually.

If any procedure is amended, a new procedure is developed and implemented, or there is a significant change to the regulations; ESI will schedule and conduct training to ensure that all personnel fully understand the change.

Relevant training received from a previous employer or other source may be used to satisfy the training requirements, provided a copy of the record of training is obtained from the employee's previous employer.

Revision: 1 Page 2 of 8

4. Training Records

Training will be documented and maintained for each ESI brokerage employee. Current training records plus the previous three years of training will be maintained in individual folders for each person.

Training records are subject to audit by the Department of Transportation (DOT) and will be provided upon request by that agency.

Records will include:

- The employee's name
- The completion date of the training
- A description, copy, or the location of the training materials used to conduct the training
- The name and address of the person providing the training
- Certification that the employee has been trained and tested

5. Training Requirements

5.1 General Awareness/Familiarization

Each employee will be provided an overview of the DOT Hazardous Materials Regulations so they will be able to recognize and identify hazardous materials as regulated in 49 CFR Parts 100 - 185.

5.2 Function-Specific Training

Each employee will be provided training that reflects their specific job requirements and how they relate to 49 CFR Parts 100 - 185. As an example, a forklift operator who loads hazardous materials won't be required to receive training on how to complete shipping papers but should be knowledgeable of package marking and labeling, segregation of incompatible materials, and proper load securement.

5.3 Safety Training

- Each employee will be provided training on emergency response information required in 49 CFR Subpart G.
- Measures to protect the employee from the hazards associated with the hazardous materials they will handle including specific procedures and measures ESI has implemented to protect employees from exposure.
- Methods and procedures to avoid accidents.

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5.4 Security Training

- Each employee will receive training that provides an awareness of security risks associated with hazardous materials and how to recognize and respond to possible security threats.
- Each employee will be provided in-depth security training which includes training on the specific requirements of ESI-03, Security Plan.

6. Demonstration of Understanding of Provided Training

After training is administered, a written examination will be given to determine if the employee has a proper level of understanding and can apply the information provided in training.

A minimum score of 80% will be regarded as passing. Any person receiving a lower score will be provided additional training until they can successfully pass the examination.

Each employee will have their examination reviewed with them to ensure they clearly understand the areas they did not get correct.

7. Specific ESI Shipper Training Requirements

Each of the topics/items listed below will be reviewed throughout the training process. Training may include a combination of self-study, classroom instruction, demonstrations, and on the job instruction.

As each item is completed, it will be documented on an ESI Hazardous Materials Shipper Qualification Record, Attachment 1.

7.1 ESI Brokerage Operating Procedures

- ESI-01, Conduct of Brokerage Operations
- ESI-02, Emergency Response
- ESI-03, Security Plan
- ESI-05, Waste Acceptance Criteria
- ESI-06, Spill Response
- ESI-07, Waste Classification for WCS Disposal
- ESI-08, Waste Characterization
- ESI-09, Quality Assurance/Quality Control

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7.2 Calculations

- Convert units (i.e. mCi to Bq, mRem to mSv.)
- Unity equations

7.3 49 CFR

7.3.1 49 CFR 172

- Proper use of the Hazardous Materials Table, 49 CFR 172.101
- · Reportable Quantities
- Special Provisions
- Marine Pollutants
- · Requirements for marking containers
- Labeling
- Placarding
- Emergency Response
- Training
- Security

7.3.2 49 CFR 173

- Hazard precedence and classification of material having more than one hazard
- Small quantities
- Excepted quantities
- · Exceptions for shipments of waste materials
- Definition of hazard Classes 1 − 9
- Determining packaging group
- · Radioactive Materials
 - o Materials exempt from regulation
 - o Definitions
 - o Package standards
 - General package requirements
 - IP containers
 - Type-A packaging
 - o Table of A1 and A2 values for radionuclides
 - Exempt material activity concentrations and exempt consignment activity limits for radionuclides

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- Excepted packages for limited quantities of radioactive material
- Requirements for multiple hazard limited quantity Class 7 materials
- o Excepted packages for radioactive instruments and articles
- o Empty Class 7 materials packaging
- Transport requirements for LSA and SCO
- Radiation level limitations for exclusive and non-exclusive use
- o Contamination limits
- Shipping paper accessibility during transportation
- Segregation and separation chart for hazardous materials

7.3.3 EPA RCRA Requirements

- 40 CFR 261 Identification and listing of hazardous waste
- · 40 CFR 263 Standards for transporters of hazardous waste
- Uniform Hazardous Waste Manifest

7.3.4 NRC Requirements

- NRC 540 Uniform LLRW Manifest
- NRC 541 Uniform LLRW Manifest
- NRC 542 Uniform LLRW Manifest
- Determining 10 CFR 61 waste classification

7.3.5 Processor/Disposer Waste Acceptance Criteria

- EnergySolutions
 - o Barnwell, SC
 - o Bear Creek Road TN waste processing facility
 - o Clive, Utah
- Toxco MMC
- Perma-Fix
 - o DSSI
 - o M&EC
 - o PFFL Gainesville, FL
 - o PFNW Richland, WA
- US Ecology
 - o Grandview, ID
 - o Richland, WA



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7.3.6 Radiation Protection

- The use of portable radiation survey instruments
- Types of radiation
- The use of time, distance, and shielding to minimize dose
- · Employee radiation limits
- · Employee contamination limits
- Proper way to frisk for contamination
- · Spill of radioactive material

Employee Name:

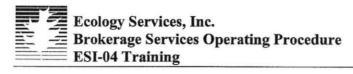
Date Issued: 03/22/19

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Attachment 1

ESI Hazardous Materials Shipper Qualification Record

Training Completion Date:		
Examination Score: Instructor Signature: _		
Requirement	Date Completed	Instructor Signature
ESI Brokerage Operating Procedures		
Demonstrate understanding of ESI-01		
Demonstrate understanding of ESI-02		
Demonstrate understanding of ESI-03		
Demonstrate understanding of ESI-05		
Demonstrate understanding of ESI-06		
Demonstrate understanding of ESI-07		
Demonstrate understanding of ESI-08		
Demonstrate understanding of ESI-09		
Calculations: 25. 25.		
Unit conversion calculations		1000
Unity equations		
49 CFR 172 3 4 5 5		
Hazardous Material Table Use		
Reportable Quantities		
Special Provisions to HazMat Table		
Marine Pollutants		
Container marking requirements		-
DOT required labeling		
Placarding		
Emergency Response requirements		II .
Training requirements		
Security		
49 CER 173. 27 10 20		
Hazard precedence and classification of material with		
more than one hazard		
Small quantities		
Excepted quantities		
Exceptions for waste materials		
Hazard Class definitions Class 1 – 9		
Determining Packaging Group		
Radioactive Materials		
Material exempt from regulation		
Definitions		
General Package requirements		
IP container requirements		
Type-A package requirements		



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Requirement	Date Completed	Instructor Signature
Use of the Table of A1 and A2 values	Pate Completed	The detail of England
Exempt material activity concentrations and exempt		
consignment activity limits for radionuclides		
Excepted package – limited quantity radioactive material		
Requirements for multiple hazard limited quantity Class		
7 materials		
Excepted package – instruments and articles		1
Empty Class 7 materials packaging		
Requirements for LSA & SCO	100 mm	
Radiation level limits for exclusive and non-exclusive		
use shipments		
Contamination limits		
Shipping paper accessibility		
Segregation and separation of hazardous materials		
EPA RCRA requirements		
40 CFR 261 Identification and listing of hazardous		
waste		
40 CFR 263 Standards for transporters of hazardous		
waste		
Uniform Hazardous Waste Manifest		
NRC Requirements		
NRC 540 Uniform LLRW manifest		
NRC 541 Uniform LLRW manifest		
NRC 542 Uniform LLRW manifest		
10 CFR 61 Waste Classification		
Processor/Disposer Acceptance Criteria		
EnergySolutions Barnwell, SC		
EnergySolutions Bear Creek Road TN		
EnergySolutions Clive, UT		
Toxco MMC		
Perma-Fix DSSI		
Perma-Fix M&EC		
Perma-Fix Florida		
Perma-Fix Northwest		
US Ecology Grandview, ID		
US Ecology Richland, WA		
Radiation Protection		
Survey instrument usage		
Types of radiation		
Time, distance, and shielding to minimize dose		
Employee radiation limits		
Employee contamination limits		
Self-frisk for contamination		
Spill of radioactive material		

Ecology Services, Inc Vehicle Information

Year/Make/ Model	Туре	VIN#	State of Registration & License #	GVWR	Owner	Owner Address
2013 Freightliner	Truck	1FVACXDT4DHBZ2353	MD 414E51	33K	Cordoba Enterprises, LLC	9135 Guilford Rd Columbia, MD 21046
2013 Ford E350	Van	1FTSE3EL4DDA37937	MD 1BC1069	10K	Cordoba Enterprises, LLC	9135 Guilford Rd Columbia, MD 21046
2011 Ford E450	Truck	1FDXE4FS0BDA95103	MD 2GL3410	17k	Cordoba Enterprises, LLC	9135 Guilford Rd Columbia, MD 21046
2014 Freightliner	Truck	3ALACXDT0EDFS3078	MD 469E22	33K	Cordoba Enterprises, LLC	9135 Guilford Rd Columbia, MD 21046

Davis, DaQuan (DNREC)

From:

Michele Patterson <mpatterson@ecologyservices.com>

Sent:

Tuesday, March 4, 2025 8:35 AM

To:

WHStransporters

Subject:

RE: Ecology Services, Inc. - Carrier VMT outdate Delaware HW Transporter Permit

Good Morning,

The MCS-150 is now showing the updates. Please let me know if there are any other issues.

Thanks,



Michele Patterson

Brokerage Operations Manager

Phone: (865) 766-5873 Mobile: (865) 679-2049 Email: mpatterson@ecologyservices.com 10427 Hickory Path Way • Knoxville • TN 37922

From: Davis, DaQuan (DNREC) <daquan.davis@delaware.gov> On Behalf Of WHStransporters

Sent: Thursday, February 27, 2025 2:08 PM

To: Michele Patterson <mpatterson@ecologyservices.com>

Subject: RE: Ecology Services, Inc. - Carrier VMT outdate Delaware HW Transporter Permit

Okay, that sounds good.



DaQuan L. Davis

Environmental Scientist

Division of Waste and Hazardous Substances

- 302-739-9403
- WHStransporters@delaware.gov
- 9 89 Kings Hwy SW, Dover, DE 19901
- dnrec.delaware.gov



From: Michele Patterson <mpatterson@ecologyservices.com>

Sent: Wednesday, February 26, 2025 4:43 PM

To: WHStransporters < WHStransporters@delaware.gov >

Subject: RE: Ecology Services, Inc. - Carrier VMT outdate Delaware HW Transporter Permit

Thank you for your response. I am working on getting the administrator to update the MCS-150, which will update the mileage. He is currently out of the office due to illness. I will notify you as soon as that is completed.

From: Davis, DaQuan (DNREC) < daquan.davis@delaware.gov > On Behalf Of WHStransporters

Sent: Tuesday, February 25, 2025 2:27 PM

To: Michele Patterson < mpatterson@ecologyservices.com >

Subject: Ecology Services, Inc. - Carrier VMT outdate Delaware HW Transporter Permit

Hello,

Thank you for submitting your application to renew your Delaware hazardous waste transporter permit application. Upon review, I have found that some information is missing or needs to be updated. Please address the item listed below:

Your carrier VMT is outdated please update it. Please view for attachments for more information.

Please provide the information requested above via e-mail within five (5) days.

Thank you,



DaQuan L. Davis

Environmental Scientist

Division of Waste and Hazardous Substances

- 302-739-9403
- WHStransporters@delaware.gov
- 9 89 Kings Hwy SW, Dover, DE 19901
- dnrec.delaware.gov



USDOT Number O MC/MX Number O Name

Search

Enter Value: 779901

Company Snapshot
ECOLOGY SERVICES INC

USDOT Number: 779901

ID/Operations | Inspections/Crashes In US | Inspections/Crashes In Canada | Safety Rating

Carriers: If you would like to update the following ID/Operations information, please complete and submit form MCS-150 which can be obtained online or from your State FMCSA office. If you would like to challenge the accuracy of your company's safety data, you can do so using FMCSA's DataQs system.

Other Information for this Carrier

- SMS Results
- ▼ Licensing & Insurance

USDOT Status

- ACTIVE: The entity's US DOT number is active.
- INACTIVE: Inactive per 49 CFR 390.19(b)(4); biennial update of MCS-150 data not completed.
- . OUT-OF-SERVICE: Carrier is under any type of out-of-service order and is not authorized to operate.

Operating Authority Status

- AUTHORIZED FOR { Passenger, Property, HHG }: This will list the specific operating authorities the carrier (or broker) is allowed to operate.
- NOT AUTHORIZED: The entity does not have any operating authority and/or is not authorized to engage in interstate, for-hire operations.
 *Please Note: NOT AUTHORIZED does not apply to Private or Intrastate operations.
- OUT-OF-SERVICE: Carrier is under any type of out-of-service order and is not authorized to operate.

Out of Service Date

Indicates the date the company was ordered Out of Service. If there are multiple Out of Service orders, the earliest date will be displayed.

Please note: If there are multiple Out-of-Service orders, the earliest date will be displayed.

For help on the explanation of individual data fields, click on any field name or for help of a general nature go to SAFER General Help.

The information below reflects the content of the FMCSA management information systems as of 03/03/2025.

To find out if this entity has a pending insurance cancellation, please click here.

		USDOT INFORMATION		
Entity Type:	CARRIER	1		
USDOT Status:	ACTIVE	Out of Se	ervice Date:	None
USDOT Number:	779901	State Carrier	ID Number:	
MCS-150 Form Date:	03/03/202	MCS-150 Mile	eage (Year):	450,000 (2024)
	0	PERATING AUTHORITY INFORMAT	TION	
Operating Authority Status:	AUTHORIZED FOR Property For Licensing and Insurance details click here		ere.	
MC/MX/FF Number(s):	MC-1057	090		
		COMPANY INFORMATION		
Legal Name:	ECOLOG	Y SERVICES INC		
DBA Name:				
Physical Address:		9135 GUILFORD ROAD COLUMBIA, MD 21046		
Phone:	(301) 362	-6700		
Mailing Address:		9135 GUILFORD ROAD COLUMBIA, MD 21046		
DUNS Number:	60-801-04	119		
Power Units:	42		Drivers:	43
peration Classification:				
x Auth. For Hire		Priv. Pass.(Non-business)	State G	Sov't
Exempt For Hire		Migrant	Local C	
Private(Property)		U.S. Mail	Indian I	Nation
Priv. Pass. (Busin		Fed. Gov't		
Carrier Operation:				
x Interstate		Intrastate Only (HM)	Intrasta	ate Only (Non-HM)
Cargo Carried:				
General Freight		Liquids/Gases	Che	micals
Contract Cogni				13095-500

Metal: sheets, coils, rolls

Motor Vehicles

Drive/Tow away

Logs, Poles, Beams, Lumber Grain, Feed, Hay

Building Materials Mobile Homes

Machinery, Large Objects

Fresh Produce

Passengers

Oilfield Equipment

Livestock

Coal/Coke

Meat x Garbage/Refuse

US Mail

Refrigerated Food

Beverages Paper Products

Utilities

Agricultural/Farm Supplies

Construction Water Well

X RADIOACTIVE/HAZA

ID/Operations | Inspections/Crashes In US | Inspections/Crashes In Canada | Safety Rating

US Inspection results for 24 months prior to: 03/03/2025

Total Inspections: 24 Total IEP Inspections: 0

Note: Total inspections may be less than the sum of vehicle, driver, and hazmat inspections. Go to Inspections Help for further information.

Inspections:				
Inspection Type	Vehicle	Driver	Hazmat	IEP
Inspections	20	24	5	0
Out of Service	4	1	0	0
Out of Service %	20%	4.2%	0%	0%
Nat'l Average % as of DATE 01/31/2025*	22.26%	6.67%	4.44%	N/A

^{*}OOS rates calculated based on the most recent 24 months of inspection data per the latest monthly SAFER Snapshot.

Inspections

Number of roadside inspections conducted within the past two years. (Note: These inspections are distinct from the periodic inspections required under 49 CFR Part 396.17, and may not include inspection of all parts and accessories set forth in 49 CFR Part 396 Appendix A.)

The inspections listed on SAFER are conducted in accordance with the North American Standard Inspection Program which was created by the Commercial Vehicle Safety Alliance (CVSA) as the roadside inspection process for inspecting commercial motor vehicles and drivers throughout North America.

Inspections are listed as total, driver, vehicle, and Hazmat. Please see https://www.fmcsa.dot.gov/safety/question-1-can-violation-free-cvsa-level-i-orlevel-v-inspection-be-used-satisfy-periodic for more details.

Crashes reported to FMCSA by states for 24 months prior to: 03/03/2025

Note: Crashes listed represent a motor carrier's involvement in reportable crashes, without any determination as to responsibility.

	Crashes:				
Туре	Fatal	Injury	Tow	Total	
Crashes	0	1	0	1	

ID/Operations | Inspections/Crashes In US | Inspections/Crashes In Canada | Safety Rating

Canadian Inspection results for 24 months prior to: 03/03/2025

Total inspections: 0

Note: Total inspections may be less than the sum of vehicle and driver inspections. Go to Inspections Help for further information.

	Inspections:	
Inspection Type	Vehicle	Driver
Inspections	0	0
Out of Service	0	0
Out of Service %	0%	0%

Note: Crashes listed represent a motor carrier's involvement in reportable crashes, without any determination as to responsibility.

Crashes:				
Туре	Fatal	Injury	Tow	Total
Crashes	0	0	0	0

ID/Operations | Inspections/Crashes In US | Inspections/Crashes In Canada | Safety Rating

The Federal safety rating does not necessarily reflect the safety of the carrier when operating in intrastate commerce.

Carrier Safety Rating:

The rating below is current as of: 03/03/2025

Review Information:

Rating Date:	02/03/2007	Review Date:	03/09/2023
Rating:	Satisfactory	Type:	Non-Ratable

SAFER Home | Feedback | Privacy Policy | USA.gov | Freedom of Information Act (FOIA) | Accessibility | OIG Hotline | Web Policies and Important Links | Plug-ins

Federal Motor Carrier Safety Administration
1200 New Jersey Avenue SE, Washington, DC 20590 • 1-800-832-5660 • TTY: 1-800-877-8339 • Field Office Contacts