

RECEIPT

DATE

03/05/25

No.

927926

RECEIVED FROM

Abington Reldan Metals, LLC

\$

1550.00

One thousand five hundred fifty and ²⁰/₁₀₀ DOLLARS☐ FOR RENT☒ FOR

DE-HW-0622

ACCOUNT		
PAYMENT		
BAL. DUE		

☐ CASH☒ CHECK☐ MONEY
ORDER☐ CREDIT
CARD

FROM

1468

TO

BY

M.M.



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

Language Preference: English

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- 0622 Expiration Date 6/30/2025

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: Abington Reldan Metals, LLC

Location Address:	Mailing Address:
550 Old Bordentown Road	550 Old Bordentown Road
Fairless Hills, PA 19030	Fairless Hills, PA 19030

Contact Person: J. Brent Grow

Title: Logistics Manager

Business Phone: 267-316-2000 x.108

Fax: 267-316-2963

E-mail: bgrow@reldan.com

24 hr. Emergency Phone: (800) 424-9300

EPA Identification Number: PAR00052194

Employer's Federal Tax ID Number: 20-3728898

4. Type of Company: (Check One)

☐ Proprietorship

☐ Partnership

☐ Corporation – City, State and Date of Incorporation: _____

☐ Municipality

☐ Public Institution

☒ Other – Explanation: Limited Liability Company

5. Parent Company Information:

Parent Company Name: ARM Holdings, LLC

Parent Company Address: 550 Old Bordentown Road

Fairless Hills, PA 19030

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 See attachment

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 See 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 _____
☐ 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# 2050888 MC# MC931949

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 _____

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 _____

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 _____

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 5PVNJ8JV2J4S

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.



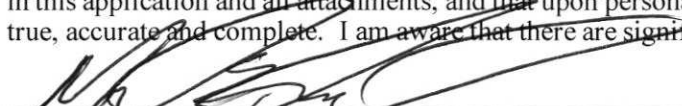
Environmental Record: Attachment See attachment



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

Michael Randolph

Printed Name

2/27/2025

Date

President

Title

Abington Reldan Metals, LLC Affiliated Companies

Reldan Related Entities	Address	Relationship	Country or State of Formation
Abington Reldan Realty, LP	550 Old Bordentown Road, Fairless Hills, PA 19030	Affiliate	Pennsylvania
ARM International Holding Company, LLC	550 Old Bordentown Road, Fairless Hills, PA 19030	Affiliate	Delaware
Reldan International Holding Company, LLC	550 Old Bordentown Road, Fairless Hills, PA 19030	Affiliate	Delaware
AR Metals Mexico, LLC	550 Old Bordentown Road, Fairless Hills, PA 19030	Affiliate	Delaware
PMPC Holdings, LLC	550 Old Bordentown Road, Fairless Hills, PA 19030	Subsidiary	Delaware
Re Sustainability Reldan Refining Private Limited	Level 11 – B Wing, Aurobindo Galaxy, Knowledge City, Hitech City Road, Hyderabad – 500081	Affiliate of ARM International Holding Company, LLC	India
Reldan Mexico SRL CV	Roble 701 Piso 9, Col Valle Del Campestre, San Pedro Garza Garcia CP 66265	Affiliate of Reldan International Holding Company, LLC	Mexico
Abington Metals (Philippines) Inc.	6th Floor, One Ayala Avenue Corporate Center, East Tower, Ayala Avenue corner Edsa, Barangay San Lorenzo, Makati City	Subsidiary	Philippines
ARM Holdings, LLC	550 Old Bordentown Road, Fairless Hills, PA 19030	Parent	Delaware
Sibanye Reldan HoldCo Inc.	c/o CSC, 251 Little Falls Drive, Wilmington, DE 19808	Parent of ARM Holdings, LLC	Delaware
RecycleOne Metals US Holdings Inc.	c/o CSC, 251 Little Falls Drive, Wilmington, DE 19808	Parent of Sibanye Reldan	Delaware
RecycleOne Metals International Holdings Proprietary Limited	Constantia Office Park, Bridgeview House, Bldg 11, 14th Ave & Hendrik Potgieter Rd, Weltevreden Park, South Africa	Parent of RecycleOne Metals US	South Africa
Sibanye Metals Recycling Proprietary Limited	Constantia Office Park, Bridgeview House, Bldg 11, 14th Ave & Hendrik Potgieter Rd, Weltevreden Park, South Africa	Parent of RecycleOne Metals Int'l	South Africa
Sibanye Stillwater Limited	Constantia Office Park, Bridgeview House, Bldg 11, 14th Ave & Hendrik Potgieter Rd, Weltevreden Park, South Africa	Parent of Sibanye Metals Recycling	South Africa



2/26/25

To: DE Dept. of Natural Resources and Environmental Control, Compliance and Permitting Section

Subject: Treatment, Storage, and Disposal Facilities List

All hazardous wastes originating from the state of Delaware and transported under this permit will be treated, stored, recycled, or disposed of at:

Abington Reldan Metals, LLC
550 Old Bordentown Road
Fairless Hills, PA 19030

Sincerely,

A handwritten signature in black ink, appearing to read "J. Brent Grow".

J. Brent Grow
Logistics Manager
Abington Reldan Metals, LLC dba Sibanye-Stillwater Reldan



2/26/25

To: DE Dept. of Natural Resources and Environmental Control, Compliance and Permitting Section

Subject: Hazardous Waste Transporter Permits List

Abington Reldan Metals, LLC currently holds hazardous waste transporter permits from the following states:

STATE	PERMIT #	EXPIRATION
Connecticut	CT-HW-901	6/30/2028
Maine	H535	4/27/2025
Maryland	HWH 784	1/31/2026
New Hampshire	TNH-0466	6/30/2025
New York	PA-611	3/26/2026
Pennsylvania	PA-AH0824	4/30/2027
South Carolina	PAR00521294	1/19/2027

Sincerely,

J. Brent Grow

Logistics Manager

Abington Reldan Metals, LLC dba Sibanye-Stillwater Reldan

USDOT Number: _____ 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. 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.



United States Department of Transportation
Federal Motor Carrier Safety Administration

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 Abington Reldan Metals LLC

(Motor Carrier name)

of PA

(Motor Carrier state or province)

Dated at 12:01 AM on this 15 day of August, 2024Amending Policy Number: FBCAT0338809Effective Date: 08/15/2024Name of Insurance Company: ARCH INSURANCE COMPANY

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 \$1,000,000 for each accident.
- ☐ This insurance is excess and the company shall not be liable for amounts in excess _____ 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: 303-534-1171.

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)

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.

(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 10,000 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 10,000 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 10,000 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 10,000 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



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

2/26/2025

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(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).

PRODUCER
Acrisure LLC
1265 Drummers Lane, Suite 300
Wayne PA 19087

CONTACT NAME: Chris Powers
PHONE (A/C, No, Ext): 866-282-9742 FAX (A/C, No): 610-995-0105
E-MAIL ADDRESS: MidAtlanticCerts@acrisure.com

INSURER(S) AFFORDING COVERAGE

NAIC #

INSURER A : Zurich American Insurance Company

16535

INSURED
Abington Reldan Metals, LLC
550 Old Bordentown Road
Fairless Hills PA 19030

ABING-1

INSURER B :

INSURER C :

INSURER D :

INSURER E :

INSURER F :

COVERAGES

CERTIFICATE NUMBER: 2145613783

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 type="checkbox"/> PRO-JECT <input checked="" type="checkbox"/> LOC <input type="checkbox"/> OTHER:	Y	Y	GLO018783108	7/1/2024	7/1/2025	EACH OCCURRENCE \$ 2,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 1,000,000 MED EXP (Any one person) \$ 10,000 PERSONAL & ADV INJURY \$ 2,000,000 GENERAL AGGREGATE \$ 4,000,000 PRODUCTS - COMP/OP AGG \$ 4,000,000 Employee Benefits \$ 2,000,000
	AUTOMOBILE LIABILITY <input 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						COMBINED SINGLE LIMIT (Ea accident) \$ BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
	UMBRELLA LIAB <input type="checkbox"/> OCCUR EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DED <input type="checkbox"/> RETENTION \$						EACH OCCURRENCE \$ AGGREGATE \$ \$
A	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	N/A	WC018783008	7/1/2024	7/1/2025	<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

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

CERTIFICATE HOLDER

CANCELLATION

DNREC Compliance and Permitting Section
89 Kings Highway
Dover, DE 19901

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



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)
02/26/2025

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(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).

PRODUCER JM Insurance Agency Partners, Inc. 5200 Waterford District Drive Suite 100 Miami FL 33126		CONTACT NAME: Marianne Belvick, CIC PHONE (A/C, No, Ext): (305) 445-5050 E-MAIL ADDRESS: mbelvick@jmapartners.com FAX (A/C, No): (305) 448-8189	
INSURED Abington Reldan Metals, LLC 550 Old Bordentown Road Fairless Hills PA 19030		INSURER(S) AFFORDING COVERAGE INSURER A: Arch Insurance Company INSURER B: Great American E&S Ins Co INSURER C: Hudson Excess Insurance Company INSURER D: INSURER E: INSURER F:	

COVERAGES **CERTIFICATE NUMBER:** 24-25 Auto & UMB **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
	COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC OTHER:						EACH OCCURRENCE \$ DAMAGE TO RENTED PREMISES (Ea occurrence) \$ MED EXP (Any one person) \$ PERSONAL & ADV INJURY \$ GENERAL AGGREGATE \$ PRODUCTS - COMP/OP AGG \$ \$
A	AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO <input checked="" type="checkbox"/> OWNED AUTOS ONLY <input checked="" type="checkbox"/> HIRED AUTOS ONLY <input checked="" type="checkbox"/> 67 <input checked="" type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> NON-OWNED AUTOS ONLY			FBCAT0338808	08/15/2024	08/15/2025	COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
B	UMBRELLA LIAB <input checked="" type="checkbox"/> OCCUR EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DED <input type="checkbox"/> RETENTION \$			XS E602551-04	07/15/2024	07/15/2025	EACH OCCURRENCE \$ 5,000,000 AGGREGATE \$ 5,000,000 \$
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) <input type="checkbox"/> Y/N If yes, describe under DESCRIPTION OF OPERATIONS below		N/A				PER STATUTE <input type="checkbox"/> OTH-ER <input type="checkbox"/> E.L. EACH ACCIDENT \$ E.L. DISEASE - EA EMPLOYEE \$ E.L. DISEASE - POLICY LIMIT \$
C	Excess of \$5,000,000 Umbrella			HXS 1000585 07	07/15/2024	07/15/2025	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)

Excess of \$5,000,000 Umbrella - Great American E&S Ins Co; XS E602554-04; 7/15/24 - 7/15/25 \$5,000,000.

CERTIFICATE HOLDER

CANCELLATION

DNREC Division of Waste & Hazardous Substances 89 Kings Highway Dover DE 19901	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 <i>Marianne Belvick</i>
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2/26/25

To: DE Dept. of Natural Resources and Environmental Control, Compliance and Permitting Section

Subject: Truck Spill Control and Safety Equipment List

Abington Reldan Metals, LLC currently employs one (1) box truck for transporting hazardous wastes. That vehicle has the following safety equipment and spill control measures:

- Fire extinguisher
- Reflective roadside warning triangles


Sincerely,

A handwritten signature in black ink, appearing to read 'J. Brent Grow'.

J. Brent Grow

Logistics Manager

Abington Reldan Metals, LLC dba Sibanye-Stillwater Reldan

	Document No.:	ARM-650-EWI-008
	Process Owner:	Senior EHS manager
	Process Owner Signature:	<i>Dennis Huacon</i>
ISO 14001:2015 / ISO 9001:2015 / ISO 45001:2018 / RIOS 2016 e-Stewards Version 4.1 / R2V3 / RQP:2015 / NAID	Approval Signature:	<i>Milton Matamoros</i>
Title: ARM CONTINGENCY PLAN FOR TRANSPORTATION OF HAZARDOUS WASTE		Page 1 of 7

1.0 EMERGENCY REPORTING


In the event of an emergency or a hazardous waste spill during transportation, Abington Reldan Metals, LLC (ARM) will immediately notify the Department of Environmental Protection and the National Response Center with the following information required by 263a.30 and 40 CFR Subpart 263.30(c) incorporated at 25 Pa. Code 263a.10:

- 1.1 Name of the person reporting the incident.
- 1.2 Name, address, and the EPA identification number of the transporter.
ARM
550 Old Bordentown Road
Fairless Hills, PA 19030
PAR000521294
- 1.3 Phone number where the person reporting the incident can be reached.
- 1.4 Date, time and location of the incident.
- 1.5 Mode of transportation and type of transport vehicle.
- 1.6 A brief description of the incident, including the type of incident.
- 1.7 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.
- 1.8 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, ARM will immediately notify the affected municipality of the occurrence and the nature of the spill.

ARM 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.

Revision	Date	Description
10	11/2/2021	Revised Logo Updated Approval Signature
11	2/2022	Updated section 3.0 List of Emergency Coordinators
12	8/8/2024	Updated logo to Sibanye logo. Updated header


	Document No.:	ARM-650-EWI-008
	Process Owner:	Senior EHS manager
	Process Owner Signature:	<i>Dennis Huacon</i>
ISO 14001:2015 / ISO 9001:2015 / ISO 45001:2018 / RIOS 2016 e-Stewards Version 4.1 / R2V3 / RQP:2015 / NAID	Approval Signature:	<i>Milton Matamoros</i>
Title: ARM CONTINGENCY PLAN FOR TRANSPORTATION OF HAZARDOUS WASTE		Page 2 of 7

of Transportation, Washington, DC 20590, and send copies of the report to the Department of Environmental Protection, and generator.

2.0 LIST OF EMERGENCY RESPONSE AGENCIES


- 2.1 Bucks County Emergency Management Agency (if incident in Bucks County)
215-340-8700
- 2.2 DEP State Emergency Notification Southeast Region
484-250-5900
- 2.3 Pennsylvania Department of Environmental Protection
717-787-4343 (24 hours)
- 2.4 PADEP – Oil Pollution Control Agency
484-250-5900
2 East Main Street
Norristown, PA 19401
- 2.5 Pennsylvania Emergency Management Agency
IN PA: 800-424-7362 (24 hours)
OUTSIDE PA: 717-651-2001
- 2.6 EPA Region 3 Regional Administrator
215-814-2920
1650 Arch Street
Philadelphia, PA 19103-2029
- 2.7 National Response Center
800-424-8802 (24 hours)
- 2.8 Pennsylvania Local Police and Fire Departments
911 or 0 (Operator)
- 2.9 Connecticut Environmental Emergency Response and Spill Prevention
860-424-3338
79 Elm Street,
Hartford, CT 06106-5127
- 2.10 Delaware State Environmental Emergency Response Team

Revision	Date	Description
10	11/2/2021	Revised Logo Updated Approval Signature
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	Document No.:	ARM-650-EWI-008
	Process Owner:	Senior EHS manager
	Process Owner Signature:	<i>Dennis Huacan</i>
ISO 14001:2015 / ISO 9001:2015 / ISO 45001:2018 / RIOS 2016 e-Stewards Version 4.1 / R2V3 / RQP:2015 / NAID	Approval Signature:	<i>Milton Matamoros</i>
Title: ARM CONTINGENCY PLAN FOR TRANSPORTATION OF HAZARDOUS WASTE		Page 3 of 7

- 1-800-662-8802
89 Kings Hwy NE
Dover, DE 19901; and additionally report to DE ER: 302-739-9401
- 2.11 Maine Environmental Protection Department- Hazardous Materials
800-452-4664
17 State House Station
Augusta, ME 04333
- 2.12 Massachusetts Energy and Environmental Affairs
1-888-304-1133
1 Winter St.
Boston, MA 02108
- 2.13 New Hampshire Department of Environmental Services
(603) 223-4381
29 Hazen Drive
Concord, NH 03301
- 2.14 New Jersey Department of Environmental Protection
1-877-927-6337
401 E. State St.
Trenton, NJ 08608
- 2.15 New York Department of Environmental Conservation-Emergency Response
(518) 402-9543
625 Broadway St.
Albany, NY 12233-0001
- 2.16 Ohio Environmental Protection Agency-Environmental Emergency Response
800-282-9378
8995 E. Main St.
Reynoldsburg, OH 43068
- 2.17 Rhode Island Office of Emergency Response
401-222-1360
235 Promenade St.

Revision	Date	Description
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	Document No.:	ARM-650-EWI-008
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ISO 14001:2015 / ISO 9001:2015 / ISO 45001:2018 / RIOS 2016 e-Stewards Version 4.1 / R2V3 / RQP:2015 / NAID	Approval Signature:	<i>Milton Matamoros</i>
Title: ARM CONTINGENCY PLAN FOR TRANSPORTATION OF HAZARDOUS WASTE		Page 4 of 7

Providence, RI 02908

3.0 LIST OF EMERGENCY COORDINATORS

- 3.1 Primary Coordinator – Security Supervisor – Tara Kilmer
550 Old Bordentown Road
Fairless Hills, PA 19030
267-316-2000 ext.104 (office)
[REDACTED]
- 3.2 Secondary Coordinator – President – Paul Hameleers
550 Old Bordentown Road
Fairless Hills, PA 19030
267-316-2000 (office)
[REDACTED]
- 3.3 President – Michael Randolph
550 Old Bordentown Road
Fairless Hills, PA 19030
267-316-2000 (office)
[REDACTED]
- 3.4 Chairman – Howard Steinberg
550 Old Bordentown Road
Fairless Hills, PA 19030
267-316-2000 (office)
[REDACTED]
- 3.5 Senior Environmental Compliance Manager – Dennis Huacon
550 Old Bordentown Road
Fairless Hills, PA 19030
267-316-2000 (office)
[REDACTED]

Revision	Date	Description
10	11/2/2021	Revised Logo Updated Approval Signature
11	2/2022	Updated section 3.0 List of Emergency Coordinators
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Title: ARM CONTINGENCY PLAN FOR TRANSPORTATION OF HAZARDOUS WASTE		Page 5 of 7

4.0 LIST OF EMERGENCY RESPONSE CONTRACTORS

4.1 Clean Harbors

2605 Egypt Road
Eagleville, PA
4105 Whitaker Ave
Philadelphia, PA
Phone: 1-800-oil-tank (1-800-645-8265)

From immediate response and containment to cleanup operations, Clean Harbors provides the manpower and equipment, logistical support, ICS / NIMS integration, and operational oversight to manage any size environmental emergency.

Clean Harbors can rapidly deploy hundreds of experienced, 40-hour-trained and certified workers to meet the needs of any incident. Whatever the response requires, from Level C through Level A, Clean Harbors can handle a wide range of hazardous materials including oil, gasoline, chemical, PCBs and biological hazards.

4.2 Chemtrec


Phone: 1-800-262-8200 (within US)
+1 703-741-5500 (from anywhere in the world)

5.0 EMERGENCY EQUIPMENT

All pieces of emergency equipment and emergency supplies kept on trucks are identified below by name, giving location, description and capabilities.

Name	Description	Location/Capabilities
Emergency Response Guide	Guide book for identifying how to respond to releases of hazardous materials	ARM Truck
Name	Description	Location/Capabilities
Portable Fire Extinguisher	Dry Chemical, All Purpose	Located on the truck Hand held, for fighting most incipient fires

Revision	Date	Description
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11	2/2022	Updated section 3.0 List of Emergency Coordinators
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ISO 14001:2015 / ISO 9001:2015 / ISO 45001:2018 / RIOS 2016 e-Stewards Version 4.1 / R2V3 / RQP:2015 / NAID	Approval Signature:	<i>Milton Matamoros</i>
Title: ARM CONTINGENCY PLAN FOR TRANSPORTATION OF HAZARDOUS WASTE		Page 6 of 7

Speedy Dry	Inert Clay Product	Located on the truck For absorption of spilled liquids
Brooms and Non-Sparking Shovels	Standard industrial	Located on truck Sweeping and scooping dry spills and absorbent
First Aid Kits	Standard industrial	Located on truck Treating minor injuries
Spill Kits	For all types of chemical including hazardous chemical	Chemical/Universal Located on truck Able to handle small to medium spills (up to 15 Gallons)
Chemical neutralizers	Chemicals used to neutralize other chemicals (Soda-Ash)	Located on truck.

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.

6.0 EXTERNAL COMMUNICATIONS

The driver is most likely to use a cell phone or a 2-way radio to contact the emergency coordinator and/or notify the emergency response agencies.


7.0 ROUTINE DECONTAMINATION PROCEDURES

If the emergency involves the spill of a hazardous chemical or hazardous chemicals are generated during the emergency, the following decontamination plan is used:

(A) The site is broken down into three areas of varying hazard degree:

1. Hazardous Area - the area of the spill or direct chemical contact and a minimum of 3 feet surrounding this area. The area is roped off with caution tape.
2. Decontamination Station #1 – this area can be any area so designated which will allow for the primary decontamination of cleanup personnel and the disposal of all rags etc. from the hazardous area.

Revision	Date	Description
10	11/2/2021	Revised Logo Updated Approval Signature
11	2/2022	Updated section 3.0 List of Emergency Coordinators
12	8/8/2024	Updated logo to Sibanye logo. Updated header

	Document No.:	ARM-650-EWI-008
	Process Owner:	Senior EHS manager
	Process Owner Signature:	<i>Dennis Huacan</i>
ISO 14001:2015 / ISO 9001:2015 / ISO 45001:2018 / RIOS 2016 e-Stewards Version 4.1 / R2V3 / RQP:2015 / NAID	Approval Signature:	<i>Milton Matamoros</i>
Title: ARM CONTINGENCY PLAN FOR TRANSPORTATION OF HAZARDOUS WASTE		Page 7 of 7

3. Decontamination Station #2 – this area can be any area beyond Decon. Station # 1, which will allow for final decontamination of cleanup personnel.
- (B) Only cleanup personnel should enter the hazardous area. Their safety watch should remain in Decon Station # 1 unless needed. All cleanup equipment (rags etc.) is disposed of in the hazardous area.
 - (C) Once the hazardous area has been cleaned, all receptacles containing cleanup materials for the Hazardous Area are sealed and handed to personnel in Decon Station # 1. All equipment used in this cleanup is cleaned and similarly handed off.
 - (D) All material in Decon Station # 1 is resealed in a clean receptacle and handed off to Decon Station # 2. All equipment used in Station # 1 is re-cleaned and similarly handed off.
 - (E) All materials exiting Decon Station # 2 should be environmentally safe for proper disposal.

8.0 EMPLOYEE TRAINING PROGRAM

Employees receive training on a yearly basis. Records are kept for a total of five years after the employee has completed work at the facility or until the facility has closed. Training consists of, at the minimum:

1. Knowledge of the materials being transported.
2. Safety and health hazards associated with materials being transported.
3. Practices for preventing spills.
4. Procedures for responding properly and rapidly to spills.
5. Emergency procedures (i.e., use of contingency plan, first aid).
6. Use of emergency equipment.

9.0 IMPLEMENTATION SCHEDULE

This contingency plan will be implemented at the receipt of the hazardous waste transporters license and shipments of hazardous wastes begin.

Revision	Date	Description
10	11/2/2021	Revised Logo Updated Approval Signature
11	2/2022	Updated section 3.0 List of Emergency Coordinators
12	8/8/2024	Updated logo to Sibanye logo. Updated header



EHS Edge

This is to certify that:

Peggy Reges

The hazmat employee has been successfully trained and tested in:
**Hazardous Materials Transportation by Highway
49 CFR 172.704(a)(1)-(a)(4) in general awareness,
function-specific, safety and security awareness**

4-Hour Program Presented on October 31, 2023

Trainer:

Pauline M. Cieri MS, CIT

Certificate Number: 20230530

EHS EDGE, LLC

99 Buckshire Place, PA 18966

TEL (215) 364-8920. ehsedge@comcast.net

Classroom training and testing

Training materials provided to hazmat employee



Document No.: ARM-100-FOR-005A

Abington Reldan Metals, LLC, Fairless Hills

Rev.4

**Title: MEETING SIGN IN SHEET FOR PRODUCTION/PLANT
SAFETY/AWARENESS**

Page 1 of 2

**SUBJECT : ARM-650-EWI-008 ARM Contingency Plan for Transportation of Hazardous
Waste Rev 11**

DATE/TIME : 7-2023

COMPETENT : Upon completion of this training employees are deemed competent.

LOCATION : PA

PRINT NAME		SIGNATURE
1.	MARGARET REGES	Margaret Reges
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
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16.		
17.		
18.		
19.		
20.		

Transportation of Hazardous 2023


**Be aware of
ARM's policy**

**Follow
procedures and
work instructions.**

**Meet customer
requirements.**

**Continual
improvement.**



 RELDAN® <small>An Abington Reldan Metals Company</small> Abington Reldan Metals, LLC, Fairless Hills	ISO 14001: 2015 ISO 9001: 2015 RIOS 2016 e-Stewards Version 4.0 R2: 2013 ISO 45001: 2018 element: RQP: 2015	ISO 14001: 8.1, 9.1.1 ISO 9001: 8.1 RIOS : 4.3 e-Steward: 8.1 R2: Section 4 ISO 45001: 8.1, 9.1.1
	Document No.:	ARM-650-EWI-008
	Owner:	EHS Manager
	Approval Signature:	<i>Dennis Huacon</i>

Title: ARM CONTINGENCY PLAN FOR TRANSPORTATION OF HAZARDOUS WASTE	Page 1 of 8
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1.0 EMERGENCY REPORTING

In the event of an emergency or a hazardous waste spill during transportation, Abington Reldan Metals, LLC (ARM) will immediately notify the Department of Environmental Protection and the National Response Center with the following information required by 263a.30 and 40 CFR Subpart 263.30(c) incorporated at 25 Pa. Code 263a.10:

- 1.1 Name of the person reporting the incident.
- 1.2 Name, address, and the EPA identification number of the transporter.

ARM
 550 Old Bordentown Road
 Fairless Hills, PA 19030
 PAR000521294
- 1.3 Phone number where the person reporting the incident can be reached.
- 1.4 Date, time and location of the incident.
- 1.5 Mode of transportation and type of transport vehicle.
- 1.6 A brief description of the incident, including the type of incident.
- 1.7 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.
- 1.8 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, ARM will immediately notify the affected municipality of the occurrence and the nature of the spill.

Revision	Date	Description
9	1/2021	Revised section 3.5
10	11/2/2021	Revised Logo Updated Approval Signature
11	2/2022	Updated section 3.0 List of Emergency Coordinators



RELDAN®
An Abington Reldan Metals Company

Abington Reldan Metals, LLC, Fairless Hills

ISO 14001: 2015
ISO 9001: 2015
RIOS 2016
e-Stewards Version 4.0
R2: 2013
ISO 45001: 2018
element: RQP: 2015

ISO 14001: 8.1, 9.1.1
ISO 9001: 8.1
RIOS : 4.3
e-Steward: 8.1
R2: Section 4
ISO 45001: 8.1, 9.1.1

Document No.: ARM-650-EWI-008

Owner: EHS Manager

Approval Signature: *Dennis Huacon*

Title: ARM CONTINGENCY PLAN FOR TRANSPORTATION OF HAZARDOUS WASTE


Page 2 of 8

ARM 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, DC 20590, and send copies of the report to the Department of Environmental Protection, and generator.

2.0 LIST OF EMERGENCY RESPONSE AGENCIES

- 2.1 Bucks County Emergency Management Agency (if incident in Bucks County)
215-340-8700
- 2.2 DEP State Emergency Notification Southeast Region
484-250-5900
- 2.3 Pennsylvania Department of Environmental Protection
717-787-4343 (24 hours)
- 2.4 PADEP – Oil Pollution Control Agency
484-250-5900
2 East Main Street
Norristown, PA 19401
- 2.5 Pennsylvania Emergency Management Agency
IN PA: 800-424-7362 (24 hours)
OUTSIDE PA: 717-651-2001
- 2.6 EPA Region 3 Regional Administrator
215-814-2920
1650 Arch Street
Philadelphia, PA 19103-2029
- 2.7 National Response Center
800-424-8802 (24 hours)
- 2.8 Pennsylvania Local Police and Fire Departments
911 or 0 (Operator)

Revision	Date	Description
9	1/2021	Revised section 3.5
10	11/2/2021	Revised Logo Updated Approval Signature
11	2/2022	Updated section 3.0 List of Emergency Coordinators

 RELDAN® <small>An Abington Reldan Metals Company</small> Abington Reldan Metals, LLC, Fairless Hills	ISO 14001: 2015 ISO 9001: 2015 RIOS 2016 e-Stewards Version 4.0 R2: 2013 ISO 45001: 2018 element: RQP: 2015	ISO 14001: 8.1, 9.1.1 ISO 9001: 8.1 RIOS : 4.3 e-Steward: 8.1 R2: Section 4 ISO 45001: 8.1, 9.1.1
	Document No.:	ARM-650-EWI-008
	Owner:	EHS Manager
	Approval Signature:	<i>Dennis Huacon</i>
Title: ARM CONTINGENCY PLAN FOR TRANSPORTATION OF HAZARDOUS WASTE		Page 3 of 8

- 2.9 Connecticut Environmental Emergency Response and Spill Prevention
860-424-3338
79 Elm Street,
Hartford, CT 06106-5127
- 2.10 Delaware State Environmental Emergency Response Team
1-800-662-8802
89 Kings Hwy NE
Dover, DE 19901; and additionally report to DE ER: 302-739-9401
- 2.11 Maine Environmental Protection Department- Hazardous Materials
800-452-4664
17 State House Station
Augusta, ME 04333
- 2.12 Massachusetts Energy and Environmental Affairs
1-888-304-1133
1 Winter St.
Boston, MA 02108
- 2.13 New Hampshire Department of Environmental Services
(603) 223-4381
29 Hazen Drive
Concord, NH 03301
- 2.14 New Jersey Department of Environmental Protection
1-877-927-6337
401 E. State St.
Trenton, NJ 08608
- 2.15 New York Department of Environmental Conservation-Emergency Response
(518) 402-9543
625 Broadway St.

Revision	Date	Description
9	1/2021	Revised section 3.5
10	11/2/2021	Revised Logo Updated Approval Signature
11	2/2022	Updated section 3.0 List of Emergency Coordinators



Abington Reldan Metals, LLC, Fairless Hills

ISO 14001: 2015	ISO 14001: 8.1, 9.1.1
ISO 9001: 2015	ISO 9001: 8.1
RIOS 2016	RIOS : 4.3
e-Stewards Version 4.0	e-Steward: 8.1
R2: 2013	R2: Section 4
ISO 45001: 2018	ISO 45001: 8.1, 9.1.1
element: RQP: 2015	

Document No.:	ARM-650-EWI-008
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Owner:	EHS Manager
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Approval Signature:	<i>Dennis Huacon</i>
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Title: ARM CONTINGENCY PLAN FOR TRANSPORTATION OF HAZARDOUS WASTE

Page 4 of 8

Albany, NY 12233-0001

2.16 Ohio Environmental Protection Agency-Environmental Emergency Response

800-282-9378
8995 E. Main St.
Reynoldsburg, OH 43068

2.17 Rhode Island Office of Emergency Response

401-222-1360
235 Promenade St.
Providence, RI 02908

3.0 LIST OF EMERGENCY COORDINATORS

3.1 Primary Coordinator – Security Supervisor – Tara Kilmer

550 Old Bordentown Road
Fairless Hills, PA 19030
267-316-2000 ext.104 (office)

3.2 Secondary Coordinator – President – Paul Hameleers


550 Old Bordentown Road
Fairless Hills, PA 19030
267-316-2000 (office)

3.3 President – Michael Randolph

550 Old Bordentown Road
Fairless Hills, PA 19030
267-316-2000 (office)

3.4 Chairman – Howard Steinberg

Revision	Date	Description
9	1/2021	Revised section 3.5
10	11/2/2021	Revised Logo Updated Approval Signature
11	2/2022	Updated section 3.0 List of Emergency Coordinators

 RELDAN® <small>An Abington Reldan Metals Company</small> Abington Reldan Metals, LLC, Fairless Hills	ISO 14001: 2015 ISO 9001: 2015 RIOS 2016 e-Stewards Version 4.0 R2: 2013 ISO 45001: 2018 element: RQP: 2015	ISO 14001: 8.1, 9.1.1 ISO 9001: 8.1 RIOS : 4.3 e-Steward: 8.1 R2: Section 4 ISO 45001: 8.1, 9.1.1
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	Owner:	EHS Manager
	Approval Signature:	<i>Dennis Huacon</i>

Title: ARM CONTINGENCY PLAN FOR TRANSPORTATION OF HAZARDOUS WASTE	Page 5 of 8
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550 Old Bordentown Road
 Fairless Hills, PA 19030
 267-316-2000 (office)
 [REDACTED]

3.5 Senior Environmental Compliance Manager – Dennis Huacon

550 Old Bordentown Road
 Fairless Hills, PA 19030
 267-316-2000 (office)
 [REDACTED]

4.0 LIST OF EMERGENCY RESPONSE CONTRACTORS

4.1 Clean Harbors

2605 Egypt Road
 Eagleville, PA
 4105 Whitaker Ave
 Philadelphia, PA
 Phone: 1-800-oil-tank (1-800-645-8265)


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Clean Harbors can rapidly deploy hundreds of experienced, 40-hour-trained and certified workers to meet the needs of any incident. Whatever the response requires, from Level C through Level A, Clean Harbors can handle a wide range of hazardous materials including oil, gasoline, chemical, PCBs and biological hazards.

4.2 Chemtrec

Phone: 1-800-262-8200 (within US)

Revision	Date	Description
9	1/2021	Revised section 3.5
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Title: ARM CONTINGENCY PLAN FOR TRANSPORTATION OF HAZARDOUS WASTE	Page 6 of 8
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+1 703-741-5500 (from anywhere in the world)

5.0 EMERGENCY EQUIPMENT

All pieces of emergency equipment and emergency supplies kept on trucks are identified below by name, giving location, description and capabilities.

Name	Description	Location/Capabilities
Emergency Response Guide	Guide book for identifying how to respond to releases of hazardous materials	ARM Truck
Name	Description	Location/Capabilities
Portable Fire Extinguisher	Dry Chemical, All Purpose	Located on the truck Hand held, for fighting most incipient fires
Speedy Dry	Inert Clay Product	Located on the truck For absorption of spilled liquids
Brooms and Non-Sparking Shovels	Standard industrial	Located on truck Sweeping and scooping dry spills and absorbent
First Aid Kits	Standard industrial	Located on truck Treating minor injuries
Spill Kits	For all types of chemical including hazardous chemical	Chemical/Universal Located on truck Able to handle small to medium spills (up to 15 Gallons)
Chemical neutralizers	Chemicals used to neutralize other chemicals (Soda-Ash)	Located on truck.

Revision	Date	Description
9	1/2021	Revised section 3.5
10	11/2/2021	Revised Logo Updated Approval Signature
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 RELDAN® <small>An Abington Reldan Metals Company</small> Abington Reldan Metals, LLC, Fairless Hills	ISO 14001: 2015 ISO 9001: 2015 RIOS 2016 e-Stewards Version 4.0 R2: 2013 ISO 45001: 2018 element: RQP: 2015	ISO 14001: 8.1, 9.1.1 ISO 9001: 8.1 RIOS : 4.3 e-Steward: 8.1 R2: Section 4 ISO 45001: 8.1, 9.1.1
	Document No.:	ARM-650-EWI-008
	Owner:	EHS Manager
	Approval Signature:	<i>Dennis Huacan</i>

Title: ARM CONTINGENCY PLAN FOR TRANSPORTATION OF HAZARDOUS WASTE	Page 7 of 8
------------------------------------------------------------------------------	-------------

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.

6.0 EXTERNAL COMMUNICATIONS

The driver is most likely to use a cell phone or a 2-way radio to contact the emergency coordinator and/or notify the emergency response agencies.

7.0 ROUTINE DECONTAMINATION PROCEDURES

If the emergency involves the spill of a hazardous chemical or hazardous chemicals are generated during the emergency, the following decontamination plan is used:

- (A) The site is broken down into three areas of varying hazard degree:
1. Hazardous Area - the area of the spill or direct chemical contact and a minimum of 3 feet surrounding this area. The area is roped off with caution tape.
 2. Decontamination Station #1 – this area can be any area so designated which will allow for the primary decontamination of cleanup personnel and the disposal of all rags etc. from the hazardous area.
 3. Decontamination Station #2 – this area can be any area beyond Decon. Station # 1, which will allow for final decontamination of cleanup personnel.
- (B) Only cleanup personnel should enter the hazardous area. Their safety watch should remain in Decon Station # 1 unless needed. All cleanup equipment (rags etc.) is disposed of in the hazardous area.
- (C) Once the hazardous area has been cleaned, all receptacles containing cleanup materials for the Hazardous Area are sealed and handed to personnel in Decon Station # 1. All equipment used in this cleanup is cleaned and similarly handed off.

Revision	Date	Description
9	1/2021	Revised section 3.5
10	11/2/2021	Revised Logo Updated Approval Signature
11	2/2022	Updated section 3.0 List of Emergency Coordinators



Abington Reldan Metals, LLC, Fairless Hills

ISO 14001: 2015	ISO 14001: 8.1, 9.1.1
ISO 9001: 2015	ISO 9001: 8.1
RIOS 2016	RIOS : 4.3
e-Stewards Version 4.0	e-Steward: 8.1
R2: 2013	R2: Section 4
ISO 45001: 2018	ISO 45001: 8.1, 9.1.1
element: RQP: 2015	
Document No.:	ARM-650-EWI-008
Owner:	EHS Manager
Approval Signature:	<i>Dennis Huacon</i>

Title: ARM CONTINGENCY PLAN FOR TRANSPORTATION OF HAZARDOUS WASTE

Page 8 of 8

- (D) All material in Decon Station # 1 is resealed in a clean receptacle and handed off to Decon Station # 2. All equipment used in Station # 1 is re-cleaned and similarly handed off.
- (E) All materials exiting Decon Station # 2 should be environmentally safe for proper disposal.

8.0 EMPLOYEE TRAINING PROGRAM

Employees receive training on a yearly basis. Records are kept for a total of five years after the employee has completed work at the facility or until the facility has closed. Training consists of, at the minimum:

1. Knowledge of the materials being transported.
2. Safety and health hazards associated with materials being transported.
3. Practices for preventing spills.
4. Procedures for responding properly and rapidly to spills.
5. Emergency procedures (i.e., use of contingency plan, first aid).
6. Use of emergency equipment.

9.0 IMPLEMENTATION SCHEDULE

This contingency plan will be implemented at the receipt of the hazardous waste transporters license and shipments of hazardous wastes begin.

Revision	Date	Description
9	1/2021	Revised section 3.5
10	11/2/2021	Revised Logo Updated Approval Signature
11	2/2022	Updated section 3.0 List of Emergency Coordinators

Certificate

of Achievement



This Certificate is Proudly Presented to

Margaret Reges

**HAS SUCCESSFULLY COMPLETED THE COURSE AND PASSED THE EXAM
ELDT Hazmat Course**

Percentage of correct answers, % -

Certificate ID: 127

April 3, 2022, 11:19 am

DATE

K. Roman

SIGNATURE



2/26/25

PUBLIC VERSION

To: DE Dept. of Natural Resources and Environmental Control, Compliance and Permitting Section

Subject: Abington Reldan Metals, LLC Company Officers

Michael Randolph, Sr. President of Sibanye-Stillwater Reldan; 550 Old Bordentown Road,
Fairless Hills, PA 19030

Bryony Watson, Treasurer; c/o Sibanye-Stillwater Reldan, 550 Old Bordentown Road,
Fairless Hills, PA 19030

Heather McDowell, Secretary; c/o Sibanye-Stillwater Reldan, 550 Old Bordentown Road,
Fairless Hills, PA 19030

Sincerely,

J. Brent Grow
Logistics Manager
Abington Reldan Metals, LLC dba Sibanye-Stillwater Reldan



2/26/25

***CONFIDENTIAL*- DO NOT POST, FORWARD, OR SHARE**

To: DE Dept. of Natural Resources and Environmental Control, Compliance and Permitting Section

Subject: Abington Reldan Metals, LLC Company Officers

Michael Randolph, Sr. President of Sibanye-Stillwater Reldan; 550 Old Bordentown Road,
Fairless Hills, PA 19030
[REDACTED]

Bryony Watson, Treasurer; c/o Sibanye-Stillwater Reldan, 550 Old Bordentown Road,
Fairless Hills, PA 19030
[REDACTED]

Heather McDowell, Secretary; c/o Sibanye-Stillwater Reldan, 550 Old Bordentown Road,
Fairless Hills, PA 19030
[REDACTED]

Sincerely,

J. Brent Grow
Logistics Manager
Abington Reldan Metals, LLC dba Sibanye-Stillwater Reldan

Davis, DaQuan (DNREC)

From: Brent Grow <bgrow@reldan.com>
Sent: Thursday, March 6, 2025 3:51 PM
To: WHStranporters
Subject: RE: Incomplete HW Transporter Permit Application (Abington)
Attachments: Abington Reldan Metals LLC Vehicle List 2-26-25.pdf; Abington Reldan Metals Employee Handbook- Appendix A Drug and Alchohol Testing Policy 4-1-2018.pdf

Good afternoon DaQuan,

Attached please find vehicle list and controlled substance testing program for Abington Reldan Metals LLC hazardous waste transporter renewal application.

Please let me know if you need any additional information.

Brent Grow
Logistics Manager
Sibanye-Stillwater Reldan
Phone: 267.316.2000 Ext.108
Mobile: 267.637.1416



INNOVATION
Living our values. **bolder future**



From: Davis, DaQuan (DNREC) <daquan.davis@delaware.gov> **On Behalf Of** WHStranporters
Sent: Thursday, March 6, 2025 10:33 AM
To: Brent Grow <bgrow@reldan.com>
Subject: Incomplete HW Transporter Permit Application (Abington)

You don't often get email from whstranporters@delaware.gov. [Learn why this is important](#)

CAUTION: This email came from outside of Reldan. DO NOT click links or open attachments unless you recognize the sender and know the content is safe. Or contact IT dept for help (ext 330).

Hello Mr. Grow,

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

- Section 16- Does Abington Reldan Metals, LLC have a control substance testing program?
- Section 17- Please provide a list of Abington Reldan Metals, LLC's vehicles.

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

Regards,



DaQuan L. Davis

Environmental Scientist

Division of Waste and Hazardous Substances

☎ 302-739-9403

✉ WHStranporters@delaware.gov

📍 89 Kings Hwy SW, Dover, DE 19901

🌐 dnrec.delaware.gov





2/26/25

To: DE Dept. of Natural Resources and Environmental Control, Compliance and Permitting Section

Subject: Vehicle List

Abington Reldan Metals, LLC private fleet vehicles:

<u>Type</u>	<u>Make</u>	<u>Year</u>	<u>VIN#</u>
Box Truck	Hino	2018	5PVNJ8J2J4S69865

Sincerely,

A handwritten signature in black ink, appearing to read "J. Brent Grow".

J. Brent Grow
Logistics Manager
Abington Reldan Metals, LLC dba Sibanye-Stillwater Reldan

APPENDIX A

WORKPLACE DRUG AND ALCOHOL TESTING POLICY AND PROCEDURE

I.Purpose

The safety and security of personnel, staff, and visitors as well as property of Abington Reldan Metals, LLC are of vital importance to Abington Reldan Metals, LLC ("Employer" or "ARM"). The purpose of this policy is to create and maintain a drug and alcohol-free work environment by identifying existing employees and potential employees, who use or abuse illicit drugs and/or abuse prescribed medications.

II.Policy Statement

It is the policy of ARM to provide a safe environment in order to conduct the business of ARM in the most effective manner possible. A safe environment will be attained by appropriate employee screening, employee education and training, surveillance of the work area, and the effective management of situations involving drugs and alcohol regarding individuals who fall under the purview of Employer authority (i.e., this would include individuals who are working and/or operating equipment on or off of Employer property). It is the intent of ARM through its policy, procedures, and practices to reduce the potential for:

- A. The manufacture, possession, use, sale, distribution, dispensation, receipt, or transportation of illegal substances while on Employer property or while otherwise engaged in Employer business.
- B. The theft, unauthorized use, or intentional mishandling or misuse of any medication and/or substance that is present at Employer for the purpose serving the public.
- C. The consumption of alcoholic beverages, except the moderate consumption of alcoholic beverages at Employer-sponsored events or groups approved by ARM.
- D. Being under the influence of substances while on Employer property or while otherwise engaged in Employer business or during employment hours.
- E. Performing duties while under the influence of substances whether on or off Employer property.

III. Definitions

- A. **Possession**: To have on one's person, in one's personal effects, in one's vehicle or otherwise under one's care, custody, or control.
- B. **Substance**: Any alcohol, drugs, other substances (whether ingested, inhaled, injected subcutaneously, or otherwise) that have known mind altering or function-altering effects upon the human body or that impair one's ability to safely perform his or her work, specifically including, but not limited to, prescriptions drugs and over-the-counter medications; alcohol, drugs, and other substances made illegal under federal or state law; "synthetic or designer" drugs; illegal inhalants; "look-alike" drugs; amphetamines, cannabinoids (marijuana and hashish), cocaine, phencyclidine (PCP), and opiates; and any drugs or other substances references in Schedule I through V of 21 C.F.R. Part 1308 (whether or not such drugs or other substances are narcotics).
- C. **Premises**: For the purpose of this policy all property, facilities, buildings, structures, installations, work locations, work areas, or vehicles owned, operated, leased, or under the control of ARM entity to which such premises or property pertains. Private vehicles parked on premises or properties are also included under this definition.
- D. **Under the Influence**: The condition wherein any of the body's sensory, cognitive, or motor functions or capabilities is altered, impaired, diminished, or affected due to substances. This also means the detectable presence of substances within the body, regardless of when or where they may have been consumed, having an alcohol test result of 0.04 or greater alcohol concentration of blood or breath, and/or having a positive test for other substances.
- E. **Prescription**: A valid prescription issued to the employee by a licensed health care provider authorized to issue such prescription and used for its intended purpose as prescribed before any expiration date.

- IV. **Applicability**: This policy and companion procedures apply to all Employer Facilities and property, and to all employees of ARM. All employees are responsible to be familiar with and comply with this policy and companion procedures.

V. Policy Provisions

- A. **It is a violation of the law to manufacture, possess, use, sell, distribute, receive, or transport illicit drugs on Employer property.** The illegal possession, distribution, or use of drugs by employees, staff, customers, visitors, guests, or other individuals on Employer property will not be tolerated and may subject violators to discipline, up to and including termination of employment pursuant to the applicable Employer policies and procedures. Any individual engaging in prohibited conduct under this policy is also subject to legal action.
- B. **Legal Compliance:** The provisions of this policy are subject to any federal, state, or local laws that may prohibit or restrict their applicability and testing for substances shall be conducted in accordance with and limited by such laws notwithstanding any terms of this policy to the contrary.
- C. **Pre-Employment Substance Testing:** For individuals to whom a contingent offer of employment is made, the offer of employment is contingent upon the results of substance test(s) of breath, saliva, urine, blood, and/or hair in accordance with this policy. Individuals to whom a contingent offer is made whose pre-employment substance tests return positive (except with respect to prescription drugs and over-the-counter medications) will be ineligible for employment. Should a candidate fail his/her initial drug test, he/she will have the option of re-testing at a testing facility selected by ARM within 24 hours at the candidate's expense. Offers of employment to individuals who test positive on a drug screen will be revoked.
- D. **Other Substance Tests:** ARM may periodically conduct substance tests based on breath, saliva, urine, blood, and/or hair samples under any of the circumstances noted below. Any employee subjected to any substance test will be required to sign a Confidential Drug and Alcohol Testing Consent Form ("Consent Form"). Refusal to sign the Consent Form or leaving the work area prior to the substance test without permission of the supervisor, or refusal to cooperate in any way with the testing process, shall be grounds for immediate disciplinary action, up to and including termination of employment. In the event an employee consents to a substance test but fails to sign a Consent Form, his/her failure will not invalidate the consent for the testing.

Any employee, who appears to be under the influence of Substance(s), at the sole discretion of ARM, should be removed from the work area and provided with transportation to the place of testing. ARM should call the emergency contact indicated by the employee or, if unavailable, should arrange for a cab or other means to transport the employee home following the test. At the discretion of ARM, employees suspected of violating this policy may be placed on administrative leave without pay pending test results. If test results are negative; the employee will be reimbursed for any salary lost during administrative leave.

- E. **Post-Accident Testing**: If an employee of ARM has caused an on- the-job injury of any kind or is involved in any on-the-job accident, the employee shall submit to a post-accident substance test. Refusal to submit to the substance test shall be grounds for immediate disciplinary action, up to and including termination of employment. Employees are prohibited from consuming alcohol within 8 hours of an accident or until such time as the post-accident testing has been completed.
- F. **Fitness for Duty**: Employees suspected to be unfit for duty as a result of the use or reasonably suspected use of substances will be subject to substance testing. Refusal to submit to substance test will be grounds for immediate disciplinary action, up to and including termination of employment.

Additionally, employees serving in safety sensitive positions shall be deemed unfit for duty if they consume alcohol within 4 hours of the start of their shift or while on duty.

- G. **Reasonable Suspicion**: ARM may require an employee to submit to a substance test if a supervisor and another individual in a management position have a reasonable belief that the employee is using, is under the influence of, or is in the possession of substance or has otherwise violated this policy's prohibition on the use of substances. Refusal to submit to a substance test will be grounds for immediate disciplinary action, up to and including termination of employment.
- H. **Random Selection Testing**: All employees are subject to random testing for substances. Where random testing is prohibited or restricted by applicable state or local statute or regulation, or other legally-binding agreement, ARM will conform to all applicable laws, regulations, and agreements notwithstanding the provisions of this policy.

- I. **Alteration of Sample**: Specimens reported by the testing laboratory as adulterated or substituted will be considered a refusal to test, and therefore grounds for immediate disciplinary action, up to and including termination of employment or ineligibility for hire.
- J. **Workplace Searches**: Management may conduct searches of Employer property, including lockers, and an employee's personal property in cases where there is reasonable cause to suspect a violation of this policy. While no search will be conducted without an employee's consent, consent to a search is a condition of continued employment. An employee who refuses to cooperate in the conducting of such searches will be subject to disciplinary action up to and including termination of employment.
- K. **Collection of Samples**: Employer shall designate a testing facility for all pre-employment, post-accident and reasonable suspicion testing. Testing samples will be collected by a qualified individual only, and such individuals may be employees of an outside testing laboratory. Collection of samples will be performed under reasonable and sanitary conditions. The chain of custody of the sample will be recorded, and this record should be retained.
- L. **Off-Premise Use**: ARM reserves the right to suspend with pay any employee who has been arrested for criminal offenses related to the manufacture, possession, sale, use, distribution, dispensation, receipt, or transport of any illegal substance pending resolution of the charges to ARM's satisfaction. Employees who are convicted of any substance related violation under state or federal law or who plead guilty or nolo contendere (i.e., no contest) to such charges must inform ARM in writing within five (5) days of the conviction or plea. **Failure to do so will result in disciplinary action, up to and including termination.** In the event of an employee's conviction or plea to charges relating to the manufacture, possession, sale, use, distribution, dispensation, receipt, or transportation of any substance, ARM will determine whether disciplinary action will be taken, including the appropriateness of continued employment.
- M. **Confidentiality of Test Results**: All test results will be handled on a confidential basis and will be available only to ARM personnel who have a need to know such results. ARM will determine who will have access to these records.

- VI.** Employer may make counseling, direction, training, and education regarding drug testing available to Employer employees.
- VII.** ARM will be primarily responsible for implementing and achieving the goals of this policy.