

RECEIPTDATE 12/16/25**No.**635821

RECEIVED FROM

KLS Lancaster LLC**\$** 1550.00One thousand five hundred fifty and 00/100 DOLLARS FOR RENT
 FORDE-HW-0508

ACCOUNT	
PAYMENT	
BAL. DUE	

- CASH
- CHECK
- MONEY ORDER
- CREDIT CARD

FROM

15363 TO _____

BY

M.M.



RECEIVED

DEC 16 2025

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

Language Preference:

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- 0508 Expiration Date March 31, 2026

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

Delaware Hazardous Waste Transporters Permit Application
Page 2 of 5

3. Company Information:

Company Name: VLS Lancaster, LLC

Location Address:	Mailing Address:
1076 Manheim Pike	1076 Manheim Pike
Lancaster, PA 17601	Lancaster, PA 17601

Contact Person: Krista Hemming Title: DOT Compliance Specialist

Business Phone: (717) 874-2139 Fax: _____

E-mail: krista.hemming@vlses.com 24 hr. Emergency Phone: (717) 393-2627

EPA Identification Number: PAD987266749

Employer's Federal Tax ID Number: 23-2562613

4. Type of Company: (Check One)

- Proprietorship
- Partnership
- Corporation – City, State and Date of Incorporation: Pennsylvania 05.16.1989
- Municipality
- Public Institution
- Other – Explanation: _____

5. Parent Company Information:

Parent Company Name: VLS Environmental Solutions, LLC

Parent Company Address: 19500 State Hwy 249

Suite 440

Houston, TX 77070

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 1

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 2
 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 3

10. Other Transporter Permits:

List all hazardous waste transporter permits held in other states.

List of transporter permits: Attachment 3
 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# 424824 MC# 767825

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 4 & 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 6

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 6

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 6

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 7

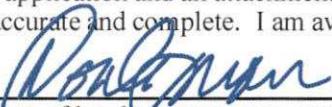
18. Environmental Record:

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 8
 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

KEITH CORDESMAN
Printed Name

12/7/25
Date

PRESIDENT
Title



Name	Title	Date of Birth	Residential Address	Business Address
John Magee	Chief Executive Officer			19500 State Hwy 249, Suite 440, Houston, TX 77070
John Kris Terrill	Chief Financial Officer and Secretary			19500 State Hwy 249, Suite 440, Houston, TX 77070
Brian Brantley	General Counsel and Head of ESG			19500 State Hwy 249, Suite 440, Houston, TX 77070
Corinna Carbone-Stephens	Chief Human Resources Officer			19500 State Hwy 249, Suite 440, Houston, TX 77070
Raul Pena	Chief Information Officer			19500 State Hwy 249, Suite 440, Houston, TX 77070
Keith Cordesman	President			19500 State Hwy 249, Suite 440, Houston, TX 77070
Geoffrey Lehy	EVP NH Waste Division			19500 State Hwy 249, Suite 440, Houston, TX 77070

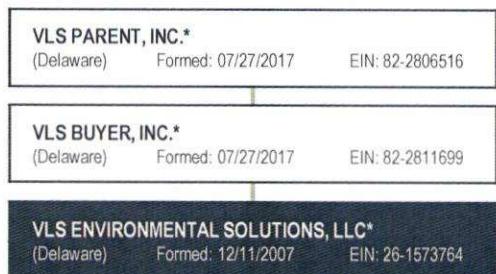
ORGANIZATIONAL STRUCTURE

VLS Environmental Solutions, LLC

as of December 2024

RAIL MARINE WASTE DISSOLVED

*All subsidiaries owned 100% unless otherwise noted.



VLS RAILCAR – HOCKLEY LLC
(Delaware) Formed: 12/18/2006 EIN: 20-8154167

VLS RAILCAR – FITZGERALD LLC
(Delaware) Formed: 12/18/2006 EIN: 20-8154078

VLS BAYTOWN, LLC
(Texas) Formed: 7/6/2018 EIN: 83-1198097

VLS MARINE SERVICES PORT ARTHUR, LLC
(Texas) Formed: 5/22/2019 EIN: 84-1929489

VLS GAS FREE SERVICES PORT ARTHUR, LLC
(Texas) Formed: 5/22/2019 EIN: 84-1889511

VLS INDUSTRIAL SERVICES, LLC
(Texas) Formed: 5/22/2019 EIN: 84-1907055

VLS MARINE SERVICES CALCASIEU, LLC
(Texas) Formed: 5/22/2019 EIN: 84-1943415

VLS PLAQUEMINE POINT, LLC
(Texas) Formed: 5/2/2022 EIN: 88-2257712

VLS GREENSPORT, LLC
(Texas) Formed: 7/6/2018 EIN: 83-1211589
Dissolved: 3/25/2022

VLS PIEDMONT LLC
(South Carolina) Formed: 05/09/1997 EIN: 58-2320342

VLS-ARMOR, LLC
(Tennessee) Formed: 12/13/2010 EIN: 27-4434716

VLS ALABAMA, LLC
(Delaware) Formed: 1/19/2018 EIN: 36-4888289

VLS HOUSTON, LLC
(Texas) Formed: 9/13/2018 EIN: 37-1912166

VLS LOGISTICS MANAGEMENT, LLC
(Delaware) Formed: 2/28/2019 EIN: 83-4039972

VLS SPARTANBURG, INC.
(South Carolina) Formed: 1/15/1969 EIN: 57-0522010

VLS FLORIDA, LLC
(Texas) Formed: 2/8/2021 EIN: 86-1950907

VLS Virginia, LLC
(Virginia) Formed: 11/25/1991 EIN: 54-1607073

VLS CHARLESTON, LLC
(Delaware) Formed: 3/23/2018 EIN: 37-1892118
Dissolved: 3/8/2022

VLS ARIZONA, LLC
(Texas) Formed: 8/13/2021 EIN: 87-2266410

VLS LANCASTER, LLC
(Pennsylvania) Formed: 5/16/1989 EIN: 23-2562613

VLS SAN DIEGO, LLC
(Texas) Formed: 12/23/2020 EIN: 85-4391592

PACIFIC TREATMENT ENVIRONMENTAL LEASING, S.A. DE C.V.
(Mexico (Labor Entity)) Formed: 10/3/2002
99% owned by VLSES EIN: 88-0540461
1% owned by VLSSD RFC: PTE0210103B9

VLS RECOVERY SERVICES DE MEXICO, S.A. DE C.V.
(Mexico (Operating Entity)) Formed: 10/5/1992
99.9998% owned by VLSES EIN: 68-0540461
0.0002% owned by VLSSD RFC: PTE921008MJ4

BAJA INDUSTRIAL HOLDINGS, S. DE R.L. DE C.V.
(Mexico (Real Estate Entity)) Formed: 9/11/2001
99% owned by VLSES EIN: 88-0534512
1% owned by VLSSD RFC: BIH0109143N3

VLS KENTUCKY, LLC
(Delaware) Formed: 03/19/2020 EIN: 85-0534512
Dissolved: 8/12/2024

ERC ACQUISITION CO. LLC
(Delaware) Formed: 1/11/2018 EIN: 82-4084247
Dissolved: 3/8/2022

VLS BALTIMORE, LLC
(Maryland) Formed: 3/2/2018 EIN: 80-0945538

VLS MILWAUKEE, LLC
(Delaware) Formed: 10/12/2018 EIN: 83-2271377

ERC Midwest Carriers LLC (f/k/a Elite Environmental LLC)
(Wisconsin) Formed: 2/14/2008 EIN: 26-1966838

Texas Molecular Holdings LLC
(Texas) Formed: 10/1/2019 EIN: 76-0691935

TM Chemicals LLC
(Texas) Formed: 1/1/2020 EIN: 76-0692194

TM Corpus Christi Services LLC
(Texas) Formed: 1/1/2020 EIN: 76-0692195

TM Deer Park Services LLC
(Texas) Formed: 1/1/2020 EIN: 76-0691937

ERC Midwest IS, LLC
(Delaware) Formed: 1/14/2019 EIN: 83-3178738
Dissolved: 3/8/2022

Attachment #3 DE-HW-0508

Designated Facilities:

Cycle Chem
500 Industrial Drive
Lewisberry, PA 17339
PAD067098822
(717) 938-4700

EQ Pennsylvania
730 Vogelsong Road
York, PA 17404
PA010154045
(717) 846-1900

Hazardous Waste Permits Held:

Pennsylvania PA - AH0679, 23 years
New Jersey NJ DEP HW50201, 23 years
New York PA-320, 2 years
Wisconsin 17280, 2 years
Missouri 25C24001000, 2 years
New Hampshire TNH-0515, 2 years
South Carolina PAD987266749, 2 years
Maine H555 W555, 1 year
Connecticut CT-HW-967, 2 years
Alabama PAD987266749, 2 years
Arkansas H-1873, 2 years
Maryland HWH726, 23 years



CERTIFICATE OF LIABILITY INSURANCE

6/30/2026

DATE (MM/DD/YYYY)
10/30/2025

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(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	Lockton Companies, LLC DBA as Lockton Insurance Brokers, LLC in CA CA license #0F15767 3657 Briarpark Dr, Ste. 700 Houston TX 77042 (866) 260-3538 TXClientSrvUT@lockton.com	CONTACT NAME: PHONE (A/C, No, Ext): E-MAIL ADDRESS:	FAX (A/C, No):
INSURED	1499782 VLS Lancaster, LLC 1076 Old Manheim Pike Lancaster PA 17601	INSURER(S) AFFORDING COVERAGE INSURER A : Starr Surplus Lines Insurance Company	NAIC # 13604
		INSURER B : --- SEE ATTACHMENT ---	
		INSURER C : Granite State Insurance Company	23809
		INSURER D : Hamilton Insurance Designated Activity Company	
		INSURER E :	
		INSURER F :	

COVERAGE **CERTIFICATE NUMBER:** 17996271 **REVISION NUMBER:** XXXXXXXX

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 SUBR INSD WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR	Y	N	1000067490251	11/1/2025	11/1/2026	EACH OCCURRENCE \$ 1,000,000 DAMAGE TO RENTED PREMISES (EA occurrence) \$ 50,000 MED EXP (Any one person) \$ 5,000 PERSONAL & ADV INJURY \$ 1,000,000 GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COMP/OP AGG \$ 2,000,000 \$
	GEN'L AGGREGATE LIMIT APPLIES PER: POLICY <input type="checkbox"/> PROJECT <input type="checkbox"/> LOC OTHER:						
B	<input checked="" type="checkbox"/> AUTOMOBILE LIABILITY ANY AUTO OWNED AUTOS ONLY <input checked="" type="checkbox"/> SCHEDULED AUTOS Hired AUTOS ONLY <input type="checkbox"/> NON-OWNED AUTOS ONLY	Y	N	See Attached	6/30/2025	6/30/2026	COMBINED SINGLE LIMIT (EA accident) \$ 5,000,000 BODILY INJURY (Per person) \$ XXXXXXXX BODILY INJURY (Per accident) \$ XXXXXXXX PROPERTY DAMAGE (Per accident) \$ XXXXXXXX \$ XXXXXXXX
A	<input checked="" type="checkbox"/> UMBRELLA LIAB <input checked="" type="checkbox"/> OCCUR	Y	N	1000337695251 ENVXSS500081-01	11/1/2025 11/1/2025	11/1/2026 11/1/2026	EACH OCCURRENCE \$ 10,000,000 AGGREGATE \$ 10,000,000 \$ XXXXXXXX
D	<input checked="" type="checkbox"/> EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE						
	DED <input type="checkbox"/> RETENTION \$						
C	<input checked="" type="checkbox"/> WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? <input type="checkbox"/> (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N <input type="checkbox"/> N	N/A	WC 97087493 (CA) WC 97087494(AOS)	6/30/2025 6/30/2025	6/30/2026 6/30/2026	X PER STATUTE OTHER E.L. EACH ACCIDENT \$ 1,000,000 E.L. DISEASE - EA EMPLOYEE \$ 1,000,000 E.L. DISEASE - POLICY LIMIT \$ 1,000,000
A	Contractors Pollution Liability	Y	N	1000067490251	11/1/2025	11/1/2026	Each Occurrence: \$1,000,000 Aggregate: \$2,000,000

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

All policies (except Workers' Compensation/EL) include a blanket automatic additional insured [provision] that confers additional insured status to the certificate holder only if there is a written contract between the named insured and the certificate holder that requires the named insured to name the certificate holder as an additional insured. In the absence of such a contractual obligation on the part of the named insured, the certificate holder is not an additional insured under the policy.

CERTIFICATE HOLDER

CANCELLATION See Attachment

17996271 Department of Natural Resource and Environmental Control Division of Waste and Hazardous Substances 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

Primary Auto:

Carrier: National Union Fire Ins Co Pitts. PA
Effective/Expiration Date: 06/30/2025-06/30/2026
Policy Number: CA 2507830
Limits - \$1,000,000 Combined Single Limit

Auto Buffer \$2M x \$1M Primary:

Carrier: AXIS Surplus Insurance Company
Effective/Expiration Date: 11/01/2025-11/01/2026
Policy Number: P-001-001284959-03
Limits - \$2,000,000 Each Occurrence

Auto Buffer \$2M x \$2M x \$1M Primary:

Carrier: Landmark American Insurance Company
Effective/Expiration Date: 11/01/2025-11/01/2026
Policy Number: LHA609630
Limits - \$2,000,000 Each Occurrence

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 VLS Lancaster, LLC of Pennsylvania
(Motor Carrier name) (Motor Carrier state or province)

Dated at 1:00 pm on this 14th day of August, 2025

Amending Policy Number: 2507830 Effective Date: 06/30/2025

Name of Insurance Company: National Union Fire Ins. Co. of Pittsburgh, PA

Countersigned by: Don Bailey
(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 \$ 1,000,000.00 for each accident.
 This insurance is excess and the company shall not be liable for amounts in excess of \$ _____ for each accident in excess of the underlying limit of \$ _____ for each accident.

Whenever required by the Federal Motor Carrier Safety Administration (FMCSA), the company agrees to furnish the FMCSA a duplicate of said policy and all its endorsements. The company also agrees, upon telephone request by an authorized representative of the FMCSA, to verify that the policy is in force as of a particular date. The telephone number to call is: 913-495-4065

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 10,001 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.



EMERGENCY RESPONSE AND SPILL CONTINGENCY PLAN

HIGHWAY TRANSPORTATION OF HAZARDOUS WASTE

In accordance with:

US DOT PHSMA HMR - 49 CFR Parts 100-185

Rhode Island DEM OWM-HW 01-14RI

Massachusetts DEP 310 CMR 30.000

VLS Lancaster, LLC
1076 Old Manheim Pike
Lancaster, PA 17601

EMERGENCY CONTACTS

CALL ORDER	EMERGENCY RESPONSE ENTITY	PHONE NUMBER	NOTES
1	Local Fire & Police	911	Emergency Response, including medical emergencies
2	CHEMTREC	(800) 424-9300	24/7 Emergency Response Coordination
3	Loren Zook		Primary Driver Contact Backup Emergency Coordinator Logistics Supervisor
4	VLS Emergency Coordinator Matt Shuman		VLS Emergency Coordinator (& Incident Commander) for Emergency Response
5	State-specific Emergency Response	See pp. 11	Notification often required immediately. See state-specific section (pp. 11)



Emergency Response & Spill Contingency Plan for

Highway Transportation of Hazardous Waste

Revision Date: 04/17/25

1. Table of Contents

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1. APPLICABILITY

This Emergency Response & Spill Contingency Plan for Highway Transportation of Hazardous Waste is applicable to the hazardous waste transportation activities carried out by VLS Lancaster LLC ("VLS - Lancaster"), a hazmat employer as defined in 49 CFR §171.8. This plan serves to address the emergency response and spill contingency plan requirements for interstate and intrastate transportation of hazardous waste and is thus applicable to a variety of different VLS employees including:

- CDL Drivers transport hazardous waste;
- Emergency contacts that will be contacted in the case of a spill or emergency during the transportation of hazardous waste;
- Any other hazmat employee, as defined in 49 CFR §171.8 including, but not limited to:
 - Managers of drivers that transport hazardous waste
 - Employees responsible for training of drivers that transport hazardous waste
 - Any employee who in the course of employment directly affects hazmat transportation safety

2. FACILITY INFORMATION

Facility Name: VLS Lancaster, LLC

Owner/Operator/Agent: VLS Lancaster, LLC

Physical Address: 1076 Old Manheim Pike, Lancaster, PA 17601

Mailing Address: 1076 Old Manheim Pike, Lancaster, PA 17601

County: Lancaster County

NAICS Code(s): 562219 - Other Nonhazardous Waste Treatment and Disposal

Phone Number: (833) 342-5372

RCRA ID: PAD987266749

3. SCOPE

This Emergency Response & Spill Contingency Plan for Highway Transportation of Hazardous Waste (the "Plan") encompasses all aspects of preventing, preparing for, and responding to spills during the highway transportation of hazardous materials. It includes procedures for immediate actions in the case of an emergency during transportation, as well as containment, cleanup, and notification requirements.

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This Plan addresses DOT, EPA, and the Emergency and Spill Response requirements for the highway transportation of hazardous waste through the states of Massachusetts and Rhode Island.

4. ROLES & RESPONSIBILITIES

4.1. HAZARDOUS WASTE TRANSPORTATION DRIVERS

- Conduct themselves according to the requirements of this Plan and all other programs related to the safe and secure transportation of hazardous waste.
- Meet minimum qualification criteria required to transport hazardous waste.
- Complete the Pre-Trip Checklist, including inspection of their vehicle and load before and during their trip.
- Demonstrate full knowledge of all driving rules and regulations.
- Complete all required training in compliance with the associated required frequency.
- Fully understand all health, safety, and environmental hazards of the materials transported.
- Fully understand and be able to execute all actions to be taken in the event of a spill, accident or other emergency involving hazardous materials or hazardous wastes.

4.2. GENERAL MANAGER

- Oversee the operations of hazardous waste operations and the accompanying programs to ensure safe, secure, and compliant operations.
- Secure the resources necessary to implement this Plan and ensure that all subject employees follow its provisions.

4.3. LOGISTICS SUPERVISOR

- In conjunction with the Health & Safety Manager, ensure that all required emergency response supplies are identified and clearly listed within company standard documentation.
- Monitor drivers and all other aspects of the program to ensure compliance with all established processes.
- Identify a primary and alternative route for transportation of each waste stream according to the properties and hazards of that stream and federal, state, and local requirements. Correspond and provide appropriate alternative action for drivers if an established route is not viable.



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- When required, draft and submit Incident Reports and Near Miss Reports. Submit draft reports to the Health & Safety Manager for review and feedback prior to submittal to the appropriate VLS system.
- Identify opportunities for continuous improvement.
- Seek feedback and suggestions on ways to improve this Plan, in conjunction with the Health & Safety Manager. Implement associated changes as appropriate.
- In conjunction with the Health & Safety Manager, oversee the frequency at which hazmat employee training is provided and ensure that that training is completed.

4.4. MAINTENANCE SUPERVISOR

- Ensure that all emergency and spill supplies identified by the Health & Safety Manager and Logistics Supervisor are ordered and always available for replenishment of vehicles.
- Oversee the organization and accessibility of all emergency and spill supplies.
- Escalate to the Logistics Supervisor and Health & Safety Manager any insufficient emergency and spill supply stock.

4.5. EMERGENCY COORDINATOR (HEALTH & SAFETY MANAGER):

- Act as the primary contact and responsible official within the Incident Command system to ensure immediate response to a spill or other emergency during transportation of hazardous waste.
- Implement the Plan.
- In conjunction with the Logistics Supervisor, ensure that all required emergency response supplies are identified and clearly listed within company standard documentation.
- Review and provide feedback on Incident Reports and Near Miss Reports drafted by the Logistics Supervisor.
- In conjunction with the Logistics Supervisor, review and update the Plan annually, or more often if required as a result of changes in regulations or operations.
- Seek feedback and suggestions on ways to improve this Plan. Implement associated changes as appropriate.
- Oversee the records retention of hazmat employee training records and, in conjunction with the Logistics Supervisor, the frequency at which training is provided and ensure that that training is completed.

5. PRE-TRANSPORT REQUIREMENTS

Prior to accepting a load of hazardous waste for highway transport, the transporter must:

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- Complete the Pre-Trip Checklist. VLS uses Samsara to compete Pre-Trip Checklists.
- Follow applicable standard documentation for loading hazardous materials for transport (i.e., Vacuum Tanker Flammable/Combustible Material Loading Requirements, Vacuum Tanker Corrosive Material Loading Requirements).
- Ensure that the transport vehicle can safely and securely transport the hazardous waste.
- Ensure the presence and accessibility of required safety equipment.
- Verify that provisions for prompt control of fires, spills, and other emergencies have been made.
- Confirm that the load is secure and that compatibility of materials offered for transport has been properly addressed.
- Confirm that all required labels, placards, paperwork, and emergency equipment is present and functional, as applicable.

Should any issue or insufficiency be detected during the Pre-Trip process, it must be fully remedied before transportation of the material can occur.

6. EMERGENCY EQUIPMENT

6.1. EMERGENCY EQUIPMENT ON EACH TRACTOR

- Spill Contingency Plan
- DOT Emergency Response Guidebook (ERG)
- First Aid Kit
- Eye Wash (at least one pint)
- Skin and eye neutralization solution
- Gloves
- Safety Glasses
- Tyvek Suits
- Boots
- Full-face Respirator
- Ten Pound ABC Fire Extinguisher
- Absorbent Pads & Booms
- Hazorb
- Tarp
- Visqueen
- Shovel
- Emergency Reflective Triangles
- Flashlight
- Mobile phone

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- CB Radio
- Chain of Custody Forms and blank hazardous waste manifests

The hazardous waste transporter, when transporting liquid hazardous waste in containers, shall have absorbent mats or materials on the vehicles capable of absorbing ten percent of the hazardous wastes in the event of a leak or spill. When transporting liquid hazardous waste in tank trucks, the hazardous waste transporter shall have a shovel and absorbent mats or materials on the vehicle capable of absorbing small leaks as may occur when hoses are disconnected. This best practice also satisfies the requirements of the State of Rhode Island.

6.2. EMERGENCY EQUIPMENT STORAGE

Emergency equipment is stored in an overpack drum mounted on the vehicle.

As a component of the Pre-Trip, performed by driver prior to transporting a hazardous waste, the driver ensures the presence of all emergency equipment, according to the list maintained within the Driver Vehicle Inspection Report (DVIR). If the driver notes any discrepancy during the Pre-Trip process, the driver is to contact the Logistics Supervisor, who ensures full remedy before the driver initiates the trip. Seals are used as a tamper-evident indicator of the emergency equipment storage. Should the driver note during the DVIR/Pre-Trip that this seal is broken, full inventory of the emergency equipment is required before the driver initiates the trip.

6.3. EMERGENCY EQUIPMENT SUPPLY & REORDERING

Emergency equipment is ordered and stocked by VLS – Lancaster's Health & Safety Manager and Maintenance Supervisor. Safety Data Sheets (SDSs) and waste profiles are reviewed to ensure that sufficient and compatible emergency and spill response equipment is available on each vehicle. In the case that new hazardous wastes with new properties or hazards are to be accepted and transported by VLS, the Health & Safety Manager and Logistics Supervisor will review and update the required contents of the emergency and spill response equipment and ensure that required supplies are ordered and stocked appropriately. The Health & Safety Manager and Logistics Supervisor will also ensure that correlated documentation, such as the Emergency Equipment List within this Plan, the Pre-Trip process, and the DVIR, are updated to reflect those changes, as required.



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7. EMERGENCY RESPONSE PROCEDURES

7.1. EMERGENCY CONTACTS & REPORTING REQUIREMENTS

In the event of a fire, spill, or unplanned release involving hazardous waste or materials, the driver is required to immediately notify, in the following order:

CALL ORDER	EMERGENCY RESPONSE ENTITY	PHONE NUMBER	NOTES
1	Local Fire & Police	911	Emergency Response, including medical emergencies
2	CHEMTREC	(800) 424-9300	24/7 Emergency Response Coordination
3	Loren Zook		Primary Driver Contact Backup Emergency Coordinator Logistics Supervisor
4	VLS Emergency Coordinator Matt Shuman		VLS Emergency Coordinator (Incident Commander) Emergency Response
5	State-specific Emergency Response	See pp. 11	Notification often required immediately. See state-specific section (pp. 11)

7.2. LOCAL FIRE & POLICE

In the event of an emergency or spill during transportation, the driver should **immediately call 911** to facilitate the dispatch of on-site assistance to secure the impacted area and to ensure the presence of any needed medical first responders.

If a driver is involved in an emergency event or accident that results in a spill of an unknown hazardous material, the driver should prioritize their safety and call 911. They may relay to emergency services the location of the emergency and the material(s) involved, if identifiable by

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placard, label by UN number in the ERG. The driver may render emergency first aid if safe and appropriate to do so.

7.3. CHEMTREC

CHEMTREC is contracted to provide emergency services to VLS. Upon being contacted and provided pertinent incident information by the VLS Emergency Coordinator, CHEMTREC will dispatch emergency response services for containment required upon arrival to the site, cleanup, and remediation.

7.4. VLS EMERGENCY CONTACT

After calling CHEMTREC, the driver will immediately call the Logistics Supervisor, who is the Primary Driver Contact and Backup Emergency Coordinator. If possible, the Logistics Supervisor will contact the VLS Emergency Coordinator/Health & Safety Manager. If not possible for the Logistics Supervisor to contact the Health & Safety Manager, or the Logistics Supervisor is not immediately available, then the driver will call the Health & Safety Manager. Upon receiving information about the incident, the Health & Safety Manager will then assume the role of VLS Emergency Coordinator.

7.5. NATIONAL RESPONSE CENTER (NRC)

The NRC must be notified by phone as soon as possible (and **no later than 12 hours after the incident**) in the event of the following occurrences:

- A person is killed or must be admitted to a hospital;
- The public must be evacuated, or a major transportation artery or facility must be shut down, for more than an hour;
- Fires, breakage, or spillage of radioactive materials or an infectious substance other than a regulated medical waste;
- A release of more than 119 gallons or 882 lbs. of marine pollutants;
- Any other life-threatening situation in the judgment of the person in physical possession (PIP) of the hazmat at the time of the incident.
- Any emergency that results in a release of a reportable quantity (RQ) of CERCLA hazardous substance to the ambient air, soil, or water must be reported to the NRC.

Reportable quantities are variable depending on the hazardous constituents. A list of reportable quantities for wastes being transported is recorded on the hazardous waste manifest.

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7.6. STATE-SPECIFIC EMERGENCY CONTACTS & NOTIFICATION:

MASSACHUSETTS:

888-304-1133

In the event of a hazardous waste transportation emergency in the state of Massachusetts, call 911, then call MassDEP's Emergency Response at 888-304-1133 as soon as possible.

RHODE ISLAND:

(401) 537-4533 (business hours) or 401-222-3070 (after hours).

In the event of a fire, spill or unplanned release involving hazardous waste or materials, the driver is required to **immediately** notify RI DEM's Emergency Response Program by calling 401-537-4533 (business hours) or 401-222-3070 (after hours).

7.7. INCIDENT COMMAND

- If safe to do so, the driver will remain with the incident vehicle, and if possible and safe, warn other motorists to stay away from the accident area.
- Upon arrival of first responders (police, fire, or environmental emergency response team), the driver will inform them of the amount and type of material that has been spilled, if known. The driver will cooperate with authorities and emergency responders and present all appropriate paperwork, as required or requested. The driver should also request that the area be blocked off to both pedestrians and vehicles to help prevent any property damage or personal injury.
- While the driver is managing the initial on-site communication, the VLS Emergency Coordinator activates and follows the applicable components of the VLS Crisis Management Plan.

7.8. IDENTIFY THE HAZARD

Prior to transporting the load of hazardous materials, the driver is to review the manifest, fully understand the contents of the load, and familiarize themselves with the corresponding hazards and emergency response guidelines in the Emergency Response Guidebook (ERG). If only the UN number is known, the driver should look up the UN number within the blue pages of the ERG and subsequently the orange pages to understand corresponding emergency response guidance.

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In the event of an emergency or spill during transit, after initiating the emergency response notification process, the driver should begin the following steps, as possible prioritizing their safety, and according to the material-specific guidelines listed within the ERG.

7.9. EVACUATION PROCEDURES

In the event of a major incident, such as a collision or spill that creates immediate danger to life or health (e.g., a ruptured bulk container, fire, or release of toxic fumes) an evacuation of the affected area will be required.

The driver should prioritize his or her own safety, and as they are able, implement the evacuation area required for the particular material and situation, as identified in the Emergency Response Guidebook (ERG) for the subject material. If **safely possible**, the driver should work to ensure that general public is kept out of this area.

As soon as emergency responders arrive, the driver should release command of the incident scene to a qualified responder.

7.10. SPILL CONTAINMENT

All spill containment should be initiated as soon as possible, which includes by the adequately trained driver. If possible and safe to do so, spill containment should begin immediately. Any person involved in containment and cleanup efforts are to wear proper personal protective equipment (PPE) during those processes. Proper PPE is identified by entry in the ERG.

As feasible, containment efforts should follow the below procedure:

- Determine the source of the spill and prevent material from spilling onto the ground or into a storm drain, sanitary sewer or waterway. The source of the spill may be controlled by using appropriate materials (absorbent booms, pads) found within the vehicle spill kit or provided and implemented by emergency responders.
- Best containment methods for solids are dependent on wind and weather conditions. A tarp or the visqueen, located in the spill kit, may be used to facilitate containment of any airborne contaminates.

7.11. SPILL CLEANUP

After containment measures are in place and the spill source controlled, cleanup operations are to begin as soon as possible. If an available VLS Emergency Response

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team or base is within an appropriate response range to the incident scene to enable provision of emergency response services, that VLS team will provide those services. Unless VLS's prospective response is coordinated by the VLS Emergency Coordinator to CHEMTREC or the VLS Emergency Coordinator to the state in which the incident occurred, an Emergency Response team, deployed via CHEMTREC or through a state-designated response team network, will respond to the scene of the incident and perform spill cleanup activities. Waste shall be handled, stored, and disposed of in covered containers that are constructed and maintained in accordance with 49 CFR Part 178.

If the material was spilled on an impervious surface, it should be absorbed with a compatible material (sand, absorbent pads or diatomaceous earth). There are many absorbent materials that can be used and will not react with to the spilled material. If the spill has reached the ground, then all contaminated soils must be removed by appropriate removal methods and disposed according to all applicable regulations.

In the case of contamination of soil or water, the extent of contamination will be determined by sampling the area that is contaminated or could potentially be contaminated. The samples will be sent to a certified laboratory to be analyzed. Sampling techniques, chain-of custody and analytical methods will be used according to procedures outlined in the EPA's SW-846. All contaminated media will be managed according to all applicable federal, state, and local regulations.

Cleanup processes will be carried out in compliance with all federal, state, and local regulations.

7.12. DECONTAMINATION

After the spill has been cleaned up and danger to persons, the environment and equipment has been mitigated, the decontamination process can begin. In most cases, the Emergency Response company that responds to the scene of the incident will perform site decontamination. VLS will work with all appropriate regulatory agencies, contractors, and waste disposal outlets to ensure site decontamination is completed properly and all waste generated is disposed of according to local, state, and federal regulations.

A. Vehicles

A truck or trailer, exposed to a spill or leak, will be decontaminated at the site in order to prevent any further release. To the extent that a unit can be transported (or moved under its own power), then that units will be transported to an authorized facility capable of further decontamination, if necessary.

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B. Implements/Tools

Each item used will be thoroughly washed over an open head container with the appropriate solvent or cleansing compound. The rinsate then will be sealed and disposed of at an approved disposal facility and according to Local, State, and Federal Regulations.

C. Clothing

Contaminated clothing will be placed with the clean-up residue and disposed of at an approved disposal site. If the clothing is reusable, it will be decontaminated properly and the residue added to other waste.

7.13. MEDICAL ASSISTANCE

If medical assistance is required as a result of an in-transit emergency or during an emergency response effort, assistance will be provided by trained first-responders. It is important that during the emergency notification process, the driver notify each of the emergency response entities (listed in Section 7.1 of the Plan), including 911.

A driver may administer first aid if safe to do so.

8. HAZARDOUS MATERIALS TRANSPORTED

Under this plan, VLS will transport the following classes of hazardous materials:

- Flammable Liquid and Combustible Liquid (Class 3),
- Corrosive Liquid (Class 8), and
- Miscellaneous (Class 9).

Waste will be transported in both bulk and non-bulk (containerized) packaging, including but not limited to drums and totes in van trailers and bulk materials in tankers.

9. ROUTE SELECTION

Prior to design of a lane for a new material, the Logistics Supervisor will determine a primary route to be taken to transport the load. The route will comply with the Hazardous Materials Regulations, VLS policy, and all local requirements; it will also consider all physical restrictions of the road, vehicle, and load.

If deviation from the identified route is required, the driver is to immediately contact the Logistics Supervisor. The Logistics Supervisor is to review the information provided by the driver and determine an alternative route, or a different action, as required.

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10. TRAINING & DRILLS

10.1. TRAINING REQUIREMENTS

Protecting employee drivers and the public is VLS's highest priority. The commitment of management and employees is critical to the success of the company and its mission. Clear communication and strict adherence to training guidelines and procedures are essential.

As such, VLS has established training guidelines and structure for employees involved in hazardous materials. Prior to transportation of hazardous materials, each CDL driver completes the Hazmat In-Depth Training Program for VLS CDL Drivers. This training focuses on the applicable regulations outlined in 49 CFR §172 and aims to equip drivers with the necessary components, knowledge, and skills to safely transport hazardous materials in compliance with federal rules and regulations. It is designed for Commercial Driver's License (CDL) holders transporting hazardous materials, and includes, but is not limited to, drivers and loaders receive HAZWOPER Training and DOT Hazardous Materials Regulations (HMR) training.

In compliance with US DOT regulations (49 CFR 172.704 Subpart H) also known as HM-181, and 49 CFR section 177.800, the VLS DOT training is for individuals who handle, manage, transport, or ship hazardous materials/hazardous waste. This includes employees who load, unload, and handle hazardous materials; select, mark, label, or modify containers or packaging; prepare materials for shipping; prepare shipping papers; are responsible for the safety of hazardous materials during shipment; and vehicle operators.

New HAZMAT employees or employees who change job functions receive this training within 90 days and additionally receive the training at least once every 3 years.

Components of the training program include the following:

1. Hazmat Training

- a. Introduction to Hazardous Materials Transportation, including but not limited to the DOT's role in regulating the transportation of a hazardous material and an overview of the regulatory requirements under 49 CFR Parts 100-185.
- b. Hazard Identification and Classification, including but not limited to the hazards of hazardous materials, proper classification, and hazard communication requirements.
- c. Packaging and containerization, including but not limited to proper packaging for hazardous materials, and requirements for marking, labeling, and placarding.
- d. Handling and Loading Procedures, including but not limited to proper loading, compatibility of materials, and load stability.

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- e. Emergency Response Preparedness, including an overview of emergency response procedures for hazmat incidents during transportation, the Identification of potential hazards and appropriate response actions, and training on using emergency response equipment, such as spill kits and personal protective equipment (PPE).
- f. Security Awareness and Measures, to ensure that security risks associated with hazmat transportation are understood.
- g. Regulatory Compliance, to provide familiarization with regulatory requirements for hazmat transportation under 49 CFR Parts 100-185 and any state regulations applicable to the hazmat employee's duties.
- h. Best practices and case studies, to communicate best practices for safe hazmat transportation based on industry standards and experiences.
- i. Safety Data Sheets (SDS) - Learn to read and understand Safety Data Sheets.
- j. Regulatory Compliance and Record-Keeping - Ensure compliance with all applicable regulations and maintain accurate records.

2. Security Training

- a. Introduction to Hazmat Transportation Security - The DOT's role in regulating hazmat transportation security.
- b. Security Risks and Threats - Identifying potential security risks and threats associated with hazmat transportation.
- c. Security Measures and Procedures - Overview of security measures to protect hazmat shipments from unauthorized access and tampering.
- d. Security Awareness and Reporting - Promoting a culture of security awareness among employees is essential.
- e. Personnel Security and Training - Requirements for screening and background checks for personnel involved in hazmat transportation.
- f. Emergency Response and Crisis Management - Procedures for responding to security incidents, emergencies, and breaches.
- g. Security Compliance Audits and Inspections - Overview of DOT security compliance audits and inspections.
- h. Best Practices and Continuous Improvement - Review of best practices for enhancing hazmat transportation security

3. VLS's Driver Training Program

- a. Driving Defensively, including the use of the Pre-Trip Vehicle Inspection and Emergency Response Procedures for reporting accidents, breakdowns, or other emergencies.
- b. Hazards of distracted driving and how to avoid distractions

4. 40-hour initial training is provided to applicable employees prior to the subject employee beginning work that requires HAZWOPER training. Hands-on training is provided as a

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part of the 40-hour initial training. Supervised field experience is also part of an employee's initial training, which takes place after that employee has completed course instruction. The initial training is followed annually by 8-hour HAZWOPER refresher training (29 CFR 1910.120)(e).

The trainings are conducted through a combination of classroom instruction, hands-on demonstrations, interactive emergency response drills, and online modules. Certification is provided after successful completion of a Final Assessment, which is conducted via a comprehensive quiz and a practical assessment. For a full description of the contents of the training provided, please see VLS's DOT Hazardous Materials Training Program.

11. DOCUMENTATION & RECORDKEEPING

11.1. NOTIFICATION & INCIDENT REPORTS

A. DOT

Section 171.16 of the HMR requires that an Incident Report Form 5800.1 be submitted within 30 days of a hazardous materials transportation incident, as defined by the HMR. The information collected on the report is used by PHMSA and other agencies to mitigate risk, analyze gaps, and enhance safety. VLS manages this process through the eCompliance system.

The Department of Transportation, Director of Hazardous Materials Registration, Materials and Transportation Bureau, Washington, D.C. 20590 will be notified in writing of the occurrence and nature of the incident.

The person who reports a hazmat incident must keep a copy of the report for at least two years. A written or electronic copy may be kept.

A copy may be kept at the reporting person's principal place of business, or elsewhere. However, if the report is not located at the principal place of business, it must be made available at the principal place of business within 24 hours if it is requested by a US DOT agent or authorized representative.

VLS maintains all hazmat employee training records, including driver training records, in the eCompliance database and in a driver-specific electronic file, which is managed within Fleetworthy.

B. STATE INCIDENT REPORTING

Written incident reporting requirements vary state-to-state. When confirming if a report is required, the contents of a report, and the time frame in which a report shall be

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submitted, the Health & Safety Manager and Logistics Supervisor are to confirm the requirements by state, based on the nature of the incident and the subject material.

C. INTERNAL INCIDENT REPORTING (POST-EMERGENCY)

- At the earliest possible time following an incident, an Incident Report or Near Miss Report must be submitted in eCompliance (or Samsara, as applicable).
- The Logistics Supervisor will work with the Health & Safety Manager and the driver and involved in the incident to complete and submit an Incident Report (in eCompliance) or Near Miss Report (in eCompliance or Samsara), as applicable.
- According to VLS standard process, the Logistics Supervisor drafts the report, the Health & Safety Manager reviews and provides feedback on the report's contents, and the Logistics Supervisor finalizes and submits the report.
- After submittal via eCompliance (or Samsara, as applicable), the Incident or Near Miss Report is reviewed by the VLS Accident Committee.
- The VLS Accident Committee submits feedback to and discusses that feedback with the Logistics and Health & Safety leadership. The VLS Accident Committee determines appropriate corrective action and assigns next steps, as required.
- Logistics and Health & Safety determine continuous improvement opportunities and are responsible for overseeing wholistic implementation of appropriate operational improvements.

D. EXTERNAL/PUBLIC COMMUNICATION

The Health & Safety Manager, in collaboration with the Health & Safety Director and Legal team, responds to all non-regulatory external requests for information (media, customers, etc.). All external communication is provided according to established internal processes, including the VLS Crisis Management Plan.

11.2. TRAINING RECORDS

At the conclusion of training, per 49 CFR §172.704(d), records are created that include the following:

- Hazmat employee's name
- Training completion date
- Description, copy, or location of training materials used
- Training provider's name and address
- Employer certification that the employee is trained and tested

EMERGENCY RESPONSE AND SPILL CONTINGENCY PLAN
HIGHWAY TRANSPORTATION OF HAZARDOUS WASTE

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These records are kept for the duration of the employment of all personnel plus an additional 90 days following their employment.

11.3. PLAN UPDATES

This Plan will be revised by the Emergency Operations Contact with support from other VLS team members according to the processes outlined herein. The Plan will be reviewed at least annually and updated under the following circumstances:

- Revisions to transportation processes
- Failure of the plan in an emergency
- Changes in the types of hazardous materials transported
- Changes in hazardous waste transportation permit status
- Changes to emergency contacts or phone numbers
- Changes in the list of emergency coordinators
- Changes in the list of emergency equipment
- Corrective actions that result in changes that affect this Plan (including those from Near Misses reported via Samsara).
- Any other change that would merit an update to the Plan.

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12. REVISION LOG

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13. RELATED POLICIES, PROCEDURES, & WORK INSTRUCTIONS

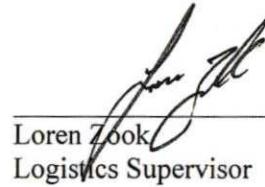
- 13.1. PRE-TRIP CHECKLIST (MANAGED WITHIN SAMSARA)
- 13.2. DOT HAZARDOUS MATERIALS TRAINING PROGRAM
- 13.3. CRISIS MANAGEMENT PLAN
- 13.4. RCRA HAZARDOUS WASTE TRAINING
- 13.5. VEHICLE MAINTENANCE LOG TEMPLATE
- 13.6. VACUUM TANKER CORROSIVE MATERIAL LOADING REQUIREMENTS
- 13.7. VACUUM TANKER FLAMMABLE/COMBUSTIBLE MATERIAL LOADING REQUIREMENTS



Certification of Driver Training

May 6, 2025

- (1) This statement certifies all drivers, and those accompanying drivers are trained and tested in compliance with 49 CFR part 172, Subpart H and 49 CFR section 177.800.
- (2) Drivers and those accompanying drivers received training in the list of notification numbers to call in the event of a spill or release, and those numbers are listed in the VLS's Emergency Response and Contingency Plan for Highway Transportation of Hazardous Waste (the emergency procedures guide submitted as TDS 01-13).



Loren Zook
Logistics Supervisor

Unit #	Equipment Classification	Equipment Type	Year	Make	Model	VIN	License Plate #
3400	Van	Van	2015	Ram	Promaster	3C6TRVBG2FE508391	ZXZ2317
13200	Tractor	Box Truck	2017	Kenworth	T270	2NKHHM6X1HM167603	ZXK6957
13406	Tractor	Roll Off	2012	Peterbilt	(Roll Off)	1NPTL70X9CD143092	AH00797
13407	Tractor	Roll Off	2015	Peterbilt	(Roll Off)	1NPTL40X2FD228035	AH48434
13409	Tractor	Roll Off	2018	Peterbilt	(Roll Off)	1NPCX4EX0JD460803	AH48435
13413	Tractor	Roll Off	2020	Peterbilt	(Roll Off)	1NPCX4EX7LD654277	AH59847
13501	Tractor	Vac	2020	Peterbilt	(PressVac)	1NPTX4EX4LD615694	AG79388
13606	Tractor	Day Cab	2007	Peterbilt	379	1XP5DB9X57N734716	AG71199
13610	Tractor	Day Cab	2014	Peterbilt	389	1XPXD49X5ED244266	AH39800
13611	Tractor	Day Cab	2015	Peterbilt	389	2XPXD49X1FM279818	AH39803
13612	Tractor	Day Cab	2015	Volvo	(Tractor)	4V4NC9EHXFN928253	AG80034
13615	Tractor	Day Cab	2021	Peterbilt	389	1XPXD49X9MD745482	AG99577
13617	Tractor	Day Cab	2024	Peterbilt	579	1XPBD49X5RD655389	AH50210
13618	Tractor	Day Cab	2025	Peterbilt	589	1XPED40X7SD703488	AH55081
13619	Tractor	Day Cab	2025	Peterbilt	589	1XPED40X4SD703495	AH55080
13620	Tractor	Day Cab	2025	Peterbilt	589	1XPED40X6SD703496	AH55082
13621	Tractor	Day Cab	2026	Peterbilt	589	1XPED49X8TD786207	AH79790
13622	Tractor	Day Cab	2026	Peterbilt	589	1XPED49XXTD786208	AH79791
13701	Tractor	Sleeper	2024	Peterbilt	579	1XPBD49X7RD602144	AH42223
13702	Tractor	Sleeper	2024	Peterbilt	579	1XPBD49X6RD648550	AH50211
13703	Tractor	Sleeper	2024	Peterbilt	579	1XPBDP9X6RD656259	AH53184
13704	Tractor	Sleeper	2024	Peterbilt	579	1XPBDP9X2RD656260	AH53185
13705	Tractor	Sleeper	2024	Peterbilt	579	1XPBDP9X6RD656262	AH39798
73112	Tank Trailer	Vacuum	2026	Tremcar		2TLLB7M24TB000053	PT747V6
73113	Tank Trailer	Vacuum	2026	Tremcar		2TLLB7M26TB000054	PT747V7
73114	Tank Trailer	Vacuum	2024	Dragon	HazMat	1UNST422XR199550	PT747V3
73206	Trailer	Van	2017	Great	Dane	1GRAA7221HB701130	PT958A7
73218	Trailer	Van	2009	Hyundai		3H3V482C39T124086	PT967G4
73219	Trailer	Van	2009	Hyundai		3H3V482C69T124096	PT967G3
73227	Trailer	Van	2016	Hyundai	48'	3H3V482C7DT292001	PT901W7
73228	Trailer	Van	2016	Hyundai	48'	3H3V482C9DT292002	PT901W6
73229	Trailer	Van	2013	Hyundai	48'	3H3V482C5DT263001	PT114X0
HV05	Tractor	Vac	2019	Kenworth	T880	1NKZD70XXXJ299462	IN 2980603
L7268	Tractor	Day Cab	2025	Kenworth	T880	1XKZD49XXSJ138729	OH PXA2964
L7259	Tractor	Day Cab	2025	Kenworth	T880	1XKZD49X2SJ138725	OH PWT8750
PV58-103	Tractor	PressVac	2019	Kenworth		1NKZX4EX1KJ248561	IN 2980662

Past/Pending Legal or Administrative Actions

(TDS-01-6)

May 6, 2025

Listing of Notices of Violation (NOV) for VLS Lancaster, formerly Lancaster Oil Company d/b/a Environmental Recovery Corporation.

There are three NOVs listed for the past five years for VLS. The dates, information and resolution for each are listed below.

April 8, 2021 – NOV for failure to disclose past NOVs on a PA Transporter Application form. There was no monetary penalty for this NOV. The resolution was to better track these types of enforcement actions to facilitate future disclosures. Item is closed with PADEP.

October 19, 2021 – NOV for understating hazardous waste carried in the years 2019-2020 to the State of Pennsylvania on the Quarterly reports submitted to the states. This has been resolved by quarterly reports out of the e-manifest system to capture all transported wastes.

January 18, 2024 – NOV for failure to control residual waste that was stored on a containment pad outside of our pit building. Roll off storage pad was noted to have wood chips and liquids outside of the roll offs that were stored up there. At no time did a spill occur though. Updated SOP for daily inspections to make twice daily inspections of the pad instead of the once per day inspection.

Davis, DaQuan (DNREC)

From: Krista Hemming <krista.hemming@vlses.com>
Sent: Thursday, December 18, 2025 9:50 AM
To: WHStransporters
Subject: RE: Delaware Solid Waste Transporter Permit
Attachments: VLS Lancaster - ER_Spill Contingency Plan_HWTrans_vF.docx

Good morning DaQuan,

Please see attached.

Happy Holidays!!!

Krista Hemming

DOT Compliance Specialist | Client Support Center

Cell: (717) 693-5421
Office: (717) 874-2139
1076 Manheim Pike, Lancaster, PA 17601
krista.hemming@vlses.com | www.vlses.com



From: Davis, DaQuan (DNREC) <daquan.davis@delaware.gov> **On Behalf Of** WHStransporters
Sent: Wednesday, December 17, 2025 4:21 PM
To: Krista Hemming <krista.hemming@vlses.com>
Subject: Delaware Solid Waste Transporter Permit

Hello,

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

- **Section 14-** The spill control plan is missing the Delaware emergency reporting numbers (1-800-662-8802 and 302-739-9401). Please update your plan and add the numbers.

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

Thank you,

DaQuan Davis



DaQuan L. Davis
Environmental Scientist
**Division of Waste and Hazardous
Substances**
302-739-9403
WHStransporters@delaware.gov
89 Kings Hwy SW, Dover, DE 19901
dnrec.delaware.gov





EMERGENCY RESPONSE AND SPILL CONTINGENCY PLAN

HIGHWAY TRANSPORTATION OF HAZARDOUS WASTE

In accordance with:

US DOT PHSMA HMR - 49 CFR Parts 100-185

Rhode Island DEM OWM-HW 01-14RI

Massachusetts DEP 310 CMR 30.000

VLS Lancaster, LLC
1076 Old Manheim Pike
Lancaster, PA 17601

EMERGENCY CONTACTS

CALL ORDER	EMERGENCY RESPONSE ENTITY	PHONE NUMBER	NOTES
1	Local Fire & Police	911	Emergency Response, including medical emergencies
2	CHEMTREC	(800) 424-9300	24/7 Emergency Response Coordination
3	Loren Zook		Primary Driver Contact Backup Emergency Coordinator Logistics Supervisor
4	VLS Emergency Coordinator Matt Shuman		VLS Emergency Coordinator (& Incident Commander) or Emergency Response
5	State-specific Emergency Response	See pp. 11	Notification often required immediately. See state-specific section (pp. 11)



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1. APPLICABILITY

This Emergency Response & Spill Contingency Plan for Highway Transportation of Hazardous Waste is applicable to the hazardous waste transportation activities carried out by VLS Lancaster LLC ("VLS - Lancaster"), a hazmat employer as defined in 49 CFR §171.8. This plan serves to address the emergency response and spill contingency plan requirements for interstate and intrastate transportation of hazardous waste and is thus applicable to a variety of different VLS employees including:

- CDL Drivers transport hazardous waste;
- Emergency contacts that will be contacted in the case of a spill or emergency during the transportation of hazardous waste;
- Any other hazmat employee, as defined in 49 CFR §171.8 including, but not limited to:
 - Managers of drivers that transport hazardous waste
 - Employees responsible for training of drivers that transport hazardous waste
 - Any employee who in the course of employment directly affects hazmat transportation safety

2. FACILITY INFORMATION

Facility Name: VLS Lancaster, LLC

Owner/Operator/Agent: VLS Lancaster, LLC

Physical Address: 1076 Old Manheim Pike, Lancaster, PA 17601

Mailing Address: 1076 Old Manheim Pike, Lancaster, PA 17601

County: Lancaster County

NAICS Code(s): 562219 – Other Nonhazardous Waste Treatment and Disposal

Phone Number: (833) 342-5372

RCRA ID: PAD987266749

3. SCOPE

This Emergency Response & Spill Contingency Plan for Highway Transportation of Hazardous Waste (the "Plan") encompasses all aspects of preventing, preparing for, and responding to spills during the highway transportation of hazardous materials. It includes procedures for immediate actions in the case of an emergency during transportation, as well as containment, cleanup, and notification requirements.

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This Plan addresses DOT, EPA, and the Emergency and Spill Response requirements for the highway transportation of hazardous waste through the states of Massachusetts and Rhode Island.

4. ROLES & RESPONSIBILITIES

4.1. HAZARDOUS WASTE TRANSPORTATION DRIVERS

- Conduct themselves according to the requirements of this Plan and all other programs related to the safe and secure transportation of hazardous waste.
- Meet minimum qualification criteria required to transport hazardous waste.
- Complete the Pre-Trip Checklist, including inspection of their vehicle and load before and during their trip.
- Demonstrate full knowledge of all driving rules and regulations.
- Complete all required training in compliance with the associated required frequency.
- Fully understand all health, safety, and environmental hazards of the materials transported.
- Fully understand and be able to execute all actions to be taken in the event of a spill, accident or other emergency involving hazardous materials or hazardous wastes.

4.2. GENERAL MANAGER

- Oversee the operations of hazardous waste operations and the accompanying programs to ensure safe, secure, and compliant operations.
- Secure the resources necessary to implement this Plan and ensure that all subject employees follow its provisions.

4.3. LOGISTICS SUPERVISOR

- In conjunction with the Health & Safety Manager, ensure that all required emergency response supplies are identified and clearly listed within company standard documentation.
- Monitor drivers and all other aspects of the program to ensure compliance with all established processes.
- Identify a primary and alternative route for transportation of each waste stream according to the properties and hazards of that stream and federal, state, and local requirements. Correspond and provide appropriate alternative action for drivers if an established route is not viable.



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- When required, draft and submit Incident Reports and Near Miss Reports. Submit draft reports to the Health & Safety Manager for review and feedback prior to submittal to the appropriate VLS system.
- Identify opportunities for continuous improvement.
- Seek feedback and suggestions on ways to improve this Plan, in conjunction with the Health & Safety Manager. Implement associated changes as appropriate.
- In conjunction with the Health & Safety Manager, oversee the frequency at which hazmat employee training is provided and ensure that that training is completed.

4.4. MAINTENANCE SUPERVISOR

- Ensure that all emergency and spill supplies identified by the Health & Safety Manager and Logistics Supervisor are ordered and always available for replenishment of vehicles.
- Oversee the organization and accessibility of all emergency and spill supplies.
- Escalate to the Logistics Supervisor and Health & Safety Manager any insufficient emergency and spill supply stock.

4.5. EMERGENCY COORDINATOR (HEALTH & SAFETY MANAGER):

- Act as the primary contact and responsible official within the Incident Command system to ensure immediate response to a spill or other emergency during transportation of hazardous waste.
- Implement the Plan.
- In conjunction with the Logistics Supervisor, ensure that all required emergency response supplies are identified and clearly listed within company standard documentation.
- Review and provide feedback on Incident Reports and Near Miss Reports drafted by the Logistics Supervisor.
- In conjunction with the Logistics Supervisor, review and update the Plan annually, or more often if required as a result of changes in regulations or operations.
- Seek feedback and suggestions on ways to improve this Plan. Implement associated changes as appropriate.
- Oversee the records retention of hazmat employee training records and, in conjunction with the Logistics Supervisor, the frequency at which training is provided and ensure that that training is completed.

5. PRE-TRANSPORT REQUIREMENTS

Prior to accepting a load of hazardous waste for highway transport, the transporter must:

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- Complete the Pre-Trip Checklist. VLS uses Samsara to compete Pre-Trip Checklists.
- Follow applicable standard documentation for loading hazardous materials for transport (i.e., Vacuum Tanker Flammable/Combustible Material Loading Requirements, Vacuum Tanker Corrosive Material Loading Requirements).
- Ensure that the transport vehicle can safely and securely transport the hazardous waste.
- Ensure the presence and accessibility of required safety equipment.
- Verify that provisions for prompt control of fires, spills, and other emergencies have been made.
- Confirm that the load is secure and that compatibility of materials offered for transport has been properly addressed.
- Confirm that all required labels, placards, paperwork, and emergency equipment is present and functional, as applicable.

Should any issue or insufficiency be detected during the Pre-Trip process, it must be fully remedied before transportation of the material can occur.

6. EMERGENCY EQUIPMENT

6.1. EMERGENCY EQUIPMENT ON EACH TRACTOR

- Spill Contingency Plan
- DOT Emergency Response Guidebook (ERG)
- First Aid Kit
- Eye Wash (at least one pint)
- Skin and eye neutralization solution
- Gloves
- Safety Glasses
- Tyvek Suits
- Boots
- Full-face Respirator
- Ten Pound ABC Fire Extinguisher
- Absorbent Pads & Booms
- Hazorb
- Tarp
- Visqueen
- Shovel
- Emergency Reflective Triangles
- Flashlight
- Mobile phone

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- CB Radio
- Chain of Custody Forms and blank hazardous waste manifests

The hazardous waste transporter, when transporting liquid hazardous waste in containers, shall have absorbent mats or materials on the vehicles capable of absorbing ten percent of the hazardous wastes in the event of a leak or spill. When transporting liquid hazardous waste in tank trucks, the hazardous waste transporter shall have a shovel and absorbent mats or materials on the vehicle capable of absorbing small leaks as may occur when hoses are disconnected. This best practice also satisfies the requirements of the State of Rhode Island.

6.2. EMERGENCY EQUIPMENT STORAGE

Emergency equipment is stored in an overpack drum mounted on the vehicle.

As a component of the Pre-Trip, performed by driver prior to transporting a hazardous waste, the driver ensures the presence of all emergency equipment, according to the list maintained within the Driver Vehicle Inspection Report (DVIR). If the driver notes any discrepancy during the Pre-Trip process, the driver is to contact the Logistics Supervisor, who ensures full remedy before the driver initiates the trip. Seals are used as a tamper-evident indicator of the emergency equipment storage. Should the driver note during the DVIR/Pre-Trip that this seal is broken, full inventory of the emergency equipment is required before the driver initiates the trip.

6.3. EMERGENCY EQUIPMENT SUPPLY & REORDERING

Emergency equipment is ordered and stocked by VLS – Lancaster's Health & Safety Manager and Maintenance Supervisor. Safety Data Sheets (SDSs) and waste profiles are reviewed to ensure that sufficient and compatible emergency and spill response equipment is available on each vehicle. In the case that new hazardous wastes with new properties or hazards are to be accepted and transported by VLS, the Health & Safety Manager and Logistics Supervisor will review and update the required contents of the emergency and spill response equipment and ensure that required supplies are ordered and stocked appropriately. The Health & Safety Manager and Logistics Supervisor will also ensure that correlated documentation, such as the Emergency Equipment List within this Plan, the Pre-Trip process, and the DVIR, are updated to reflect those changes, as required.



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7. EMERGENCY RESPONSE PROCEDURES

7.1. EMERGENCY CONTACTS & REPORTING REQUIREMENTS

In the event of a fire, spill, or unplanned release involving hazardous waste or materials, the driver is required to immediately notify, in the following order:

CALL ORDER	EMERGENCY RESPONSE ENTITY	PHONE NUMBER	NOTES
1	Local Fire & Police	911	Emergency Response, including medical emergencies
2	CHEMTREC	(800) 424-9300	24/7 Emergency Response Coordination
3	Loren Zook		Primary Driver Contact Backup Emergency Coordinator Logistics Supervisor
4	VLS Emergency Coordinator Matt Shuman		VLS Emergency Coordinator (& Incident Commander) for Emergency Response
5	State-specific Emergency Response	See pp. 11	Notification often required immediately. See state-specific section (pp. 11)

7.2. LOCAL FIRE & POLICE

In the event of an emergency or spill during transportation, the driver should **immediately call 911** to facilitate the dispatch of on-site assistance to secure the impacted area and to ensure the presence of any needed medical first responders.

If a driver is involved in an emergency event or accident that results in a spill of an unknown hazardous material, the driver should prioritize their safety and call 911. They may relay to emergency services the location of the emergency and the material(s) involved, if identifiable by

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placard, label by UN number in the ERG. The driver may render emergency first aid if safe and appropriate to do so.

7.3. CHEMTREC

CHEMTREC is contracted to provide emergency services to VLS. Upon being contacted and provided pertinent incident information by the VLS Emergency Coordinator, CHEMTREC will dispatch emergency response services for containment required upon arrival to the site, cleanup, and remediation.

7.4. VLS EMERGENCY CONTACT

After calling CHEMTREC, the driver will immediately call the Logistics Supervisor, who is the Primary Driver Contact and Backup Emergency Coordinator. If possible, the Logistics Supervisor will contact the VLS Emergency Coordinator/Health & Safety Manager. If not possible for the Logistics Supervisor to contact the Health & Safety Manager, or the Logistics Supervisor is not immediately available, then the driver will call the Health & Safety Manager. Upon receiving information about the incident, the Health & Safety Manager will then assume the role of VLS Emergency Coordinator.

7.5. NATIONAL RESPONSE CENTER (NRC)

The NRC must be notified by phone as soon as possible (and **no later than 12 hours after the incident**) in the event of the following occurrences:

- A person is killed or must be admitted to a hospital;
- The public must be evacuated, or a major transportation artery or facility must be shut down, for more than an hour;
- Fires, breakage, or spillage of radioactive materials or an infectious substance other than a regulated medical waste;
- A release of more than 119 gallons or 882 lbs. of marine pollutants;
- Any other life-threatening situation in the judgment of the person in physical possession (PIP) of the hazmat at the time of the incident.
- Any emergency that results in a release of a reportable quantity (RQ) of CERCLA hazardous substance to the ambient air, soil, or water must be reported to the NRC.

Reportable quantities are variable depending on the hazardous constituents. A list of reportable quantities for wastes being transported is recorded on the hazardous waste manifest.

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7.6. STATE-SPECIFIC EMERGENCY CONTACTS & NOTIFICATION:

MASSACHUSETTS:

888-304-1133

In the event of a hazardous waste transportation emergency in the state of Massachusetts, call 911, then call MassDEP's Emergency Response at 888-304-1133 as soon as possible.

RHODE ISLAND:

(401) 537-4533 (business hours) or 401-222-3070 (after hours).

In the event of a fire, spill or unplanned release involving hazardous waste or materials, the driver is required to **immediately** notify RI DEM's Emergency Response Program by calling 401-537-4533 (business hours) or 401-222-3070 (after hours).

DELWARE:

1-800-662-8802 AND (302) 739-9401

7.7. INCIDENT COMMAND

- If safe to do so, the driver will remain with the incident vehicle, and if possible and safe, warn other motorists to stay away from the accident area.
- Upon arrival of first responders (police, fire, or environmental emergency response team), the driver will inform them of the amount and type of material that has been spilled, if known. The driver will cooperate with authorities and emergency responders and present all appropriate paperwork, as required or requested. The driver should also request that the area be blocked off to both pedestrians and vehicles to help prevent any property damage or personal injury.
- While the driver is managing the initial on-site communication, the VLS Emergency Coordinator activates and follows the applicable components of the VLS Crisis Management Plan.

7.8. IDENTIFY THE HAZARD

Prior to transporting the load of hazardous materials, the driver is to review the manifest, fully understand the contents of the load, and familiarize themselves with the corresponding hazards and emergency response guidelines in the Emergency Response Guidebook (ERG). If only the UN number is known, the driver should look up the UN

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number within the blue pages of the ERG and subsequently the orange pages to understand corresponding emergency response guidance.

In the event of an emergency or spill during transit, after initiating the emergency response notification process, the driver should begin the following steps, as possible prioritizing their safety, and according to the material-specific guidelines listed within the ERG.

7.9. EVACUATION PROCEDURES

In the event of a major incident, such as a collision or spill that creates immediate danger to life or health (e.g., a ruptured bulk container, fire, or release of toxic fumes) an evacuation of the affected area will be required.

The driver should prioritize his or her own safety, and as they are able, implement the evacuation area required for the particular material and situation, as identified in the Emergency Response Guidebook (ERG) for the subject material. If **safely possible**, the driver should work to ensure that general public is kept out of this area.

As soon as emergency responders arrive, the driver should release command of the incident scene to a qualified responder.

7.10. SPILL CONTAINMENT

All spill containment should be initiated as soon as possible, which includes by the adequately trained driver. If possible and safe to do so, spill containment should begin immediately. Any person involved in containment and cleanup efforts are to wear proper personal protective equipment (PPE) during those processes. Proper PPE is identified by entry in the ERG.

As feasible, containment efforts should follow the below procedure:

- Determine the source of the spill and prevent material from spilling onto the ground or into a storm drain, sanitary sewer or waterway. The source of the spill may be controlled by using appropriate materials (absorbent booms, pads) found within the vehicle spill kit or provided and implemented by emergency responders.
- Best containment methods for solids are dependent on wind and weather conditions. A tarp or the visqueen, located in the spill kit, may be used to facilitate containment of any airborne contaminates.

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7.11. SPILL CLEANUP

After containment measures are in place and the spill source controlled, cleanup operations are to begin as soon as possible. If an available VLS Emergency Response team or base is within an appropriate response range to the incident scene to enable provision of emergency response services, that VLS team will provide those services. Unless VLS's prospective response is coordinated by the VLS Emergency Coordinator to CHEMTREC or the VLS Emergency Coordinator to the state in which the incident occurred, an Emergency Response team, deployed via CHEMTREC or through a state-designated response team network, will respond to the scene of the incident and perform spill cleanup activities. Waste shall be handled, stored, and disposed of in covered containers that are constructed and maintained in accordance with 49 CFR Part 178.

If the material was spilled on an impervious surface, it should be absorbed with a compatible material (sand, absorbent pads or diatomaceous earth). There are many absorbent materials that can be used and will not react with to the spilled material. If the spill has reached the ground, then all contaminated soils must be removed by appropriate removal methods and disposed according to all applicable regulations.

In the case of contamination of soil or water, the extent of contamination will be determined by sampling the area that is contaminated or could potentially be contaminated. The samples will be sent to a certified laboratory to be analyzed. Sampling techniques, chain-of custody and analytical methods will be used according to procedures outlined in the EPA's SW-846. All contaminated media will be managed according to all applicable federal, state, and local regulations.

Cleanup processes will be carried out in compliance with all federal, state, and local regulations.

7.12. DECONTAMINATION

After the spill has been cleaned up and danger to persons, the environment and equipment has been mitigated, the decontamination process can begin. In most cases, the Emergency Response company that responds to the scene of the incident will perform site decontamination. VLS will work with all appropriate regulatory agencies, contractors, and waste disposal outlets to ensure site decontamination is completed properly and all waste generated is disposed of according to local, state, and federal regulations.

A. Vehicles

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A truck or trailer, exposed to a spill or leak, will be decontaminated at the site in order to prevent any further release. To the extent that a unit can be transported (or moved under its own power), then that units will be transported to an authorized facility capable of further decontamination, if necessary.

B. Implements/Tools

Each item used will be thoroughly washed over an open head container with the appropriate solvent or cleansing compound. The rinsate then will be sealed and disposed of at an approved disposal facility and according to Local, State, and Federal Regulations.

C. Clothing

Contaminated clothing will be placed with the clean-up residue and disposed of at an approved disposal site. If the clothing is reusable, it will be decontaminated properly and the residue added to other waste.

7.13. MEDICAL ASSISTANCE

If medical assistance is required as a result of an in-transit emergency or during an emergency response effort, assistance will be provided by trained first-responders. It is important that during the emergency notification process, the driver notify each of the emergency response entities (listed in Section 7.1 of the Plan), including 911.

A driver may administer first aid if safe to do so.

8. HAZARDOUS MATERIALS TRANSPORTED

Under this plan, VLS will transport the following classes of hazardous materials:

- Flammable Liquid and Combustible Liquid (Class 3),
- Corrosive Liquid (Class 8), and
- Miscellaneous (Class 9).

Waste will be transported in both bulk and non-bulk (containerized) packaging, including but not limited to drums and totes in van trailers and bulk materials in tankers.

9. ROUTE SELECTION

Prior to design of a lane for a new material, the Logistics Supervisor will determine a primary route to be taken to transport the load. The route will comply with the Hazardous Materials

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Regulations, VLS policy, and all local requirements; it will also consider all physical restrictions of the road, vehicle, and load.

If deviation from the identified route is required, the driver is to immediately contact the Logistics Supervisor. The Logistics Supervisor is to review the information provided by the driver and determine an alternative route, or a different action, as required.

10. TRAINING & DRILLS

10.1. TRAINING REQUIREMENTS

Protecting employee drivers and the public is VLS's highest priority. The commitment of management and employees is critical to the success of the company and its mission. Clear communication and strict adherence to training guidelines and procedures are essential.

As such, VLS has established training guidelines and structure for employees involved in hazardous materials. Prior to transportation of hazardous materials, each CDL driver completes the Hazmat In-Depth Training Program for VLS CDL Drivers. This training focuses on the applicable regulations outlined in 49 CFR §172 and aims to equip drivers with the necessary components, knowledge, and skills to safely transport hazardous materials in compliance with federal rules and regulations. It is designed for Commercial Driver's License (CDL) holders transporting hazardous materials, and includes, but is not limited to, drivers and loaders receive HAZWOPER Training and DOT Hazardous Materials Regulations (HMR) training.

In compliance with US DOT regulations (49 CFR 172.704 Subpart H) also known as HM-181, and 49 CFR section 177.800, the VLS DOT training is for individuals who handle, manage, transport, or ship hazardous materials/hazardous waste. This includes employees who load, unload, and handle hazardous materials; select, mark, label, or modify containers or packaging; prepare materials for shipping; prepare shipping papers; are responsible for the safety of hazardous materials during shipment; and vehicle operators.

New HAZMAT employees or employees who change job functions receive this training within 90 days and additionally receive the training at least once every 3 years.

Components of the training program include the following:

1. Hazmat Training
 - a. Introduction to Hazardous Materials Transportation, including but not limited to the DOT's role in regulating the transportation of a hazardous material and an overview of the regulatory requirements under 49 CFR Parts 100-185.

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- b. Hazard Identification and Classification, including but not limited to the hazards of hazardous materials, proper classification, and hazard communication requirements.
- c. Packaging and containerization, including but not limited to proper packaging for hazardous materials, and requirements for marking, labeling, and placarding.
- d. Handling and Loading Procedures, including but not limited to proper loading, compatibility of materials, and load stability.
- e. Emergency Response Preparedness, including an overview of emergency response procedures for hazmat incidents during transportation, the Identification of potential hazards and appropriate response actions, and training on using emergency response equipment, such as spill kits and personal protective equipment (PPE).
- f. Security Awareness and Measures, to ensure that security risks associated with hazmat transportation are understood.
- g. Regulatory Compliance, to provide familiarization with regulatory requirements for hazmat transportation under 49 CFR Parts 100-185 and any state regulations applicable to the hazmat employee's duties.
- h. Best practices and case studies, to communicate best practices for safe hazmat transportation based on industry standards and experiences.
- i. Safety Data Sheets (SDS) - Learn to read and understand Safety Data Sheets.
- j. Regulatory Compliance and Record-Keeping - Ensure compliance with all applicable regulations and maintain accurate records.

2. Security Training

- a. Introduction to Hazmat Transportation Security - The DOT's role in regulating hazmat transportation security.
- b. Security Risks and Threats - Identifying potential security risks and threats associated with hazmat transportation.
- c. Security Measures and Procedures - Overview of security measures to protect hazmat shipments from unauthorized access and tampering.
- d. Security Awareness and Reporting - Promoting a culture of security awareness among employees is essential.
- e. Personnel Security and Training - Requirements for screening and background checks for personnel involved in hazmat transportation.
- f. Emergency Response and Crisis Management - Procedures for responding to security incidents, emergencies, and breaches.
- g. Security Compliance Audits and Inspections - Overview of DOT security compliance audits and inspections.
- h. Best Practices and Continuous Improvement - Review of best practices for enhancing hazmat transportation security

3. VLS's Driver Training Program

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- a. Driving Defensively, including the use of the Pre-Trip Vehicle Inspection and Emergency Response Procedures for reporting accidents, breakdowns, or other emergencies.
- b. Hazards of distracted driving and how to avoid distractions

4. 40-hour initial training is provided to applicable employees prior to the subject employee beginning work that requires HAZWOPER training. Hands-on training is provided as a part of the 40-hour initial training. Supervised field experience is also part of an employee's initial training, which takes place after that employee has completed course instruction. The initial training is followed annually by 8-hour HAZWOPER refresher training (29 CFR 1910.120)(e).

The trainings are conducted through a combination of classroom instruction, hands-on demonstrations, interactive emergency response drills, and online modules. Certification is provided after successful completion of a Final Assessment, which is conducted via a comprehensive quiz and a practical assessment. For a full description of the contents of the training provided, please see VLS's DOT Hazardous Materials Training Program.

11. DOCUMENTATION & RECORDKEEPING

11.1. NOTIFICATION & INCIDENT REPORTS

A. DOT

Section 171.16 of the HMR requires that an Incident Report Form 5800.1 be submitted within 30 days of a hazardous materials transportation incident, as defined by the HMR. The information collected on the report is used by PHMSA and other agencies to mitigate risk, analyze gaps, and enhance safety. VLS manages this process through the eCompliance system.

The Department of Transportation, Director of Hazardous Materials Registration, Materials and Transportation Bureau, Washington, D.C. 20590 will be notified in writing of the occurrence and nature of the incident.

The person who reports a hazmat incident must keep a copy of the report for at least two years. A written or electronic copy may be kept.

A copy may be kept at the reporting person's principal place of business, or elsewhere. However, if the report is not located at the principal place of business, it must be made available at the principal place of business within 24 hours if it is requested by a US DOT agent or authorized representative.

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VLS maintains all hazmat employee training records, including driver training records, in the eCompliance database and in a driver-specific electronic file, which is managed within Fleetworthy.

B. STATE INCIDENT REPORTING

Written incident reporting requirements vary state-to-state. When confirming if a report is required, the contents of a report, and the time frame in which a report shall be submitted, the Health & Safety Manager and Logistics Supervisor are to confirm the requirements by state, based on the nature of the incident and the subject material.

C. INTERNAL INCIDENT REPORTING (POST-EMERGENCY)

- At the earliest possible time following an incident, an Incident Report or Near Miss Report must be submitted in eCompliance (or Samsara, as applicable).
- The Logistics Supervisor will work with the Health & Safety Manager and the driver and involved in the incident to complete and submit an Incident Report (in eCompliance) or Near Miss Report (in eCompliance or Samsara), as applicable.
- According to VLS standard process, the Logistics Supervisor drafts the report, the Health & Safety Manager reviews and provides feedback on the report's contents, and the Logistics Supervisor finalizes and submits the report.
- After submittal via eCompliance (or Samsara, as applicable), the Incident or Near Miss Report is reviewed by the VLS Accident Committee.
- The VLS Accident Committee submits feedback to and discusses that feedback with the Logistics and Health & Safety leadership. The VLS Accident Committee determines appropriate corrective action and assigns next steps, as required.
- Logistics and Health & Safety determine continuous improvement opportunities and are responsible for overseeing holistic implementation of appropriate operational improvements.

D. EXTERNAL/PUBLIC COMMUNICATION

The Health & Safety Manager, in collaboration with the Health & Safety Director and Legal team, responds to all non-regulatory external requests for information (media, customers, etc.). All external communication is provided according to established internal processes, including the VLS Crisis Management Plan.



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11.2. TRAINING RECORDS

At the conclusion of training, per 49 CFR §172.704(d), records are created that include the following:

- Hazmat employee's name
- Training completion date
- Description, copy, or location of training materials used
- Training provider's name and address
- Employer certification that the employee is trained and tested

These records are kept for the duration of the employment of all personnel plus an additional 90 days following their employment.

11.3. PLAN UPDATES

This Plan will be revised by the Emergency Operations Contact with support from other VLS team members according to the processes outlined herein. The Plan will be reviewed at least annually and updated under the following circumstances:

- Revisions to transportation processes
- Failure of the plan in an emergency
- Changes in the types of hazardous materials transported
- Changes in hazardous waste transportation permit status
- Changes to emergency contacts or phone numbers
- Changes in the list of emergency coordinators
- Changes in the list of emergency equipment
- Corrective actions that result in changes that affect this Plan (including those from Near Misses reported via Samsara).
- Any other change that would merit an update to the Plan.



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12. REVISION LOG

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13. RELATED POLICIES, PROCEDURES, & WORK INSTRUCTIONS

- 13.1. PRE-TRIP CHECKLIST (MANAGED WITHIN SAMSARA)
- 13.2. DOT HAZARDOUS MATERIALS TRAINING PROGRAM
- 13.3. CRISIS MANAGEMENT PLAN
- 13.4. RCRA HAZARDOUS WASTE TRAINING
- 13.5. VEHICLE MAINTENANCE LOG TEMPLATE
- 13.6. VACUUM TANKER CORROSIVE MATERIAL LOADING REQUIREMENTS
- 13.7. VACUUM TANKER FLAMMABLE/COMBUSTIBLE MATERIAL LOADING REQUIREMENTS