

**Tradebe Proposal For:**

**IOWA STATE UNIVERSITY**  
Procurement Services

**TRANSPORTATION AND DISPOSAL OF NON-RADIOACTIVE  
CHEMICAL WASTE, DISPOSAL OF COMPRESSED GAS  
CYLINDERS AND STABILIZATION OF POTENTIALLY  
EXPLOSIVE AND REACTIVE COMPOUNDS  
RFQ-1000121**

**Due: Sunday, August 16, 2020**

**Submitted By:**



**Tradebe Environmental Services, LLC**  
1433 E.83<sup>rd</sup> Ave., Ste. 200  
Merrillville, IN 46410  
Toll-Free: (800) 388-7242  
Fax: (219) 769-6019  
Email: [usa.bids@Tradebe.com](mailto:usa.bids@Tradebe.com)  
URL: [www.Tradebeusa.com](http://www.Tradebeusa.com)

**Persons of Contact**

**Account Manager**  
**Andy Steward**  
515-805-7157  
[andy.steward@tradebe.com](mailto:andy.steward@tradebe.com)

**Director of Contract and Outsourcing**  
**David Holmgreen**  
(219) 354-2435  
[david.holmgreen@tradebe.com](mailto:david.holmgreen@tradebe.com)

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August 13, 2020

Iowa State University Procurement Services  
1340 Administrative Services Building  
2221 Wanda Daley Drive  
Ames, IA 50011

**RE: RFQ-1000121 Transportation and Disposal of Non-Radioactive Chemical Waste, Disposal of Compressed Gas Cylinders and Stabilization of Potentially Explosive and Reactive Compounds**

Dear Ms. Grauerholz:

Tradebe Environmental Services, LLC (Tradebe) is pleased to submit this proposal to provide Chemical Waste Disposal and Transportation services for Iowa State University. Tradebe values the partnership with the Iowa State that we developed over the past several years. As your current vendor, we would like to show our commitment to our partnership by providing price reductions in the attached submittal to several items in the areas of labor, transportation rates, and certain waste streams. The benefit and value to Iowa State is a lower Total Cost of Ownership while continuing to drive Sustainability at Work with Tradebe.

Tradebe understands that the successful Contractor will provide qualified personnel, supplies, and equipment to provide for the transportation and disposal of hazardous waste, training and other support for Iowa State.

Tradebe has been in the waste industry for over thirty (30) years and has ample experience, knowledge, abilities, and resources to perform all the services defined in the solicitation in full compliance with all federal, state, and local laws and regulations.

Tradebe feels it is the best-positioned environmental services company that can provide Iowa State with the most responsible, compliant, cost-effective, and environmentally friendly waste management services. Our devotion to customer service and our commitment to maintaining the highest ethical and professional standards make us stand out from our competitors.

We look forward to building a close relationship based on the safe and successful management of your waste.

Sincerely,



David Holmgreen  
Director Contract and Outsourcing  
Phone: (219) 397-3951  
Email: [David.Holmgreen@tradebe.com](mailto:David.Holmgreen@tradebe.com)

## A. COMPANY BACKGROUND

Tradebe Environmental Services, LLC (Tradebe) is a privately held and diversified waste management company that has been engaged in the collection, treatment, recycling, and disposal of hazardous and non-hazardous waste for over 30 years.

Tradebe's US operations own and operate 9 RCRA permitted Part B treatment, storage, and disposal facilities. Tradebe owns and operates a nonhazardous industrial landfill, an oil recovery facility, a nonhazardous wastewater treatment facility and nonhazardous bulking and processing facilities. Tradebe also has 17 ten-day transfer facilities that are staffed with highly trained, experienced, and degreed Chemists who can provide lab pack and high hazard services. Tradebe also maintains a fleet of fully permitted waste hauling vehicles operating out of both our TSDF and transfer locations for your transportation needs.

Tradebe's compliance with state, federal, and environmental regulations is a critical component of our operation. From providing high-quality services to our customers, to protecting the health and safety of our employees and our surrounding communities, Tradebe is committed to maintaining high ethical, professional, and environmental standards.

Tradebe collects, transfers, and processes waste generated by customers from a variety of industries, including chemical, petrochemical, paint and coatings, printing, plastics, and pharmaceutical industries and educational institutions. Our current customers include Fortune 500 companies, small quantity generators, State, Federal, and local governmental bodies, universities, hospitals, and research centers.

Tradebe's Technical and Field Services groups offer a variety of waste management services, including full-scale Household Hazardous Waste (HHW) Collection; turn-key lab packing services by degreed chemist; unknown identification; Stabilization and Chemical Fixation; High Hazardous Chemical Management (i.e. explosives stabilization, compressed gas cylinder processing); Emergency Response, Tank and Industrial Cleaning; Vacuum Services; Transportation; and RCRA/DOT training.

Tradebe main sales, customer service, administrative, and corporate functions are managed from our headquarters in Merrillville, Indiana. All of our facilities, including our satellite offices, are connected through a computer network and state of the art inventory management system. Customer information, profiles, and shipping documents are entered into a safe and secure computer system to generate Tradebe's operating records. Tradebe provides streamlined communications for customer service, companywide online waste tracking, and waste management operations. We have developed specific programs to meet the needs of our customers, and continue the growth of our operations. These programs also support the administrative and regulatory conditions needed to accommodate a changing and ever more demanding regulated industry.

### A.1 TRADEBE'S VALUE ADDED SERVICES

Tradebe offers turnkey waste management services safely, efficiently, and in compliance with all local, state, and federal regulatory standards. These services often result in lower rates, simpler logistics, and an overall added convenience. At Tradebe, we offer quality, innovative waste management services that contribute to sustainable development and provide value to our customers. Tradebe and our customers are partners in environmental stewardship and responsible waste management.

Highlights of Tradebe's innovative, efficient waste management technologies and services include:

- Innovative Patented Solid Distillation System (SDS)
- Safe and Efficient Lab Pack/De-Pack Facility with a 70% to 80% beneficial reuse and recycle rate.
- Efficient packaging and shipping of lab packs on the same day.

- Cost –Saving High Hazard Stabilization Services with Field Chemists who are cross-trained to handle high-hazard waste, as well as, standard waste. Tradebe's Energetics Group also provides cylinder identification, processing, and disposal services.
- Time- Saving Waste Analysis and Unknown Identification Services
- Rapid waste stream and lab pack approval process.

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## A.2 LIST OF EQUIPMENT

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The equipment and supplies provided by Tradebe will meet the requirements of all federal, state, and local codes and regulations.

### Packaging Supplies:

- Drums (Steel/Poly/Fiber)(5,15,30, and 55 gallon sizes)
- Cubic Yard Boxes
- Rolls of Tape
- Drum Liners
- Paper Work (Manifests, Profile sheets, Land Bans, Drum Inventory Forms, etc.)
- Reference Materials (40 CFR, 49 CFR, Chemical Dictionary)
- 85 Gallon Over Packs
- Pallets
- Vermiculite
- DOT/EPA Labels & Markings

### Safety Equipment:

- ABC Fire Extinguishers
- First Aid Kits
- Respirators
- Nitrile Gloves
- Safety Glasses
- Caution Tape
- Spill Station (Broom, Shovel, 55 Gallon drum, and a bag of oil dry)
- Metal-X Fire Extinguishers
- Tyvek Suits (Poly Coated)
- Steel-toe shoes
- Latex Gloves
- Full Face Shield
- Portable Eyewash Station

### Miscellaneous Supplies:

- Scales
- Drum Carts
- Unknown Test Kits
- Paint Sticks/Markers
- Grounding Straps
- Oil Dry
- Pallet Jacks
- Spark Proof Tools
- Air Horn

### Transportation Equipment:

- Semi-Truck

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## A.3 ON-SITE STABILIZATION OF EXPLOSIVES AND ENERGETIC COMPOUNDS

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Tradebe's High Hazardous program allows us to provide our customers with safe and cost-effective options for handling and disposing of high hazard chemicals and compressed gas cylinders. Tradebe's High Hazard Chemists have extensive training and are experienced in the identification, handling, removal, and disposal of these hard to handle chemicals. Tradebe's mobile unit with remote opening capability can safely open containers

of ethyl ether, picric acid, organic peroxides and many other dangerous chemicals. Our High Haz team utilizes precise engineering controls to conduct all remote openings or controlled detonations, completely ensuring the safety of personnel and public alike.

Many relatively common chemicals, such as ethers, tetrahydrofuran, and 1, 4-dioxane can form peroxides and become explosive when stored improperly or for excessive periods of time.

Tradebe's High Hazard Program also offers compressed gas identification and disposal services. From the handling and disposal of a single item to the safe removal of large quantities of gas cylinders requiring special handling, Tradebe's High Hazard Team has the equipment and experience necessary to do the job right. Tradebe has the ability to process cylinders with stuck or missing valves and to identify cylinders with no visible markings or labels.

#### **A.4 UNKNOWN IDENTIFICATION**

Tradebe will assist Iowa State to identify any unknowns they come across during their waste receiving process.

Tradebe's chemists will sample and test the waste materials utilizing Tradebe's Unknown Testing Procedures. From the field analysis, Tradebe's chemists should be able to determine hazard class and proper packaging protocol.

The procedures are only completed in the presence of other trained chemists for safety purposes. Chemists will don appropriate safety gear (which may include respirators) while performing the tests. Tradebe's Unknown Testing Procedures aid our qualified field personnel in the verification and subsequent acceptance of unknown materials encountered during on-site operations. Tradebe's field chemists can test for the following:

- Physical Appearance
- pH
- Flammability
- Water Reactivity
- Cyanide
- Sulfides
- Peroxides
- Oxidizers
- Qualitative PCB
- Screen

## B. TRAINING GUIDELINES AND PERSONNEL

### B.1 TRAINING

The table below depicts the minimum training required by job title for any employee to work under the contract:

Training	Project Manager	Field Chemist	Field Technician
Bachelor's Degree (chemistry or related)	X	X	
40-hour OSHA HAZWOPER	X	X	
24-hour OSHA HAZWOPER			X
8-hour OSHA Refresher Course	X	X	X
49 CFR Subpart H	X	X	X
HAZCAT (Unknown Testing)	X	X	
First Aid/CPR	X	X	
Lab Pack Training	X	X	
TSD Facility Acceptance Criteria	X	X	X
Class B CDL	X	X	
High Hazard Chemical Training	X	X	

#### Other Additional Training/Training Information:

Tradebe maintains that the responsibility for a safe operation rests with all of its employees. Specific training is given to all responsible on-site supervisory personnel and the individuals handling, storing, and treating wastes. Off-site personnel participate in training programs to meet the requirements of 29 CFR 1910.120. Site design, operational procedures, and planning affect the operations; therefore, individuals involved in these functions must be aware of the criteria for a safe and efficient operation. Emergency response training is conducted per 29 CFR 1910.120 and the Contingency Plan for each facility. This means that each employee, with a specific duty established in the Contingency Plan, will be fully trained as to the specifics of the duty or action required. This training includes drills or simulated emergencies to provide practice for personnel and to determine the adequacy and effectiveness of the Contingency Plan. Training for personnel also encompasses RCRA and DOT training. Each level of personnel is trained to meet or exceed federal, state, and company requirements.

Tradebe provides all of its Technical Field Service employees, which includes the Reactive Division, with a 40-hour initial HAZWOPER training course per OSHA 29 CFR 1910.120(e), before their assignment to a work area. The training is provided "in-house" by a Tradebe Certified Environmental Trainer. The personnel must also pass a DOT and OSHA/HAZWOPER physical examination and receive certification to wear a respirator, before working with hazardous materials. All personnel receive an annual physical as a part of Tradebe's medical monitoring program.

Tradebe's training program for Hazardous Materials Transportation personnel includes HM-126F Training, which addresses general awareness, function specific, and safety training per DOT 49 CFR 172.704. Transportation personnel, at a minimum, are also provided 24-hour TSD facility HAZWOPER training per OSHA 29 CFR 1910.120(p). All 40-hour and 24-hour trained personnel also receive an eight-hour annual refresher training course. Refresher courses consist of relevant topics, including, but not limited to: Contingency Planning and Emergency Response, Decontamination, Waste Characterization, Hazardous Materials Handling, a Review of Current Federal Regulations, and Container Management.



All Field Chemists have obtained their Class B Commercial Driver's License (CDL) with Hazmat and Airbrake Endorsements. Also, the following courses are included in their training:

- ✓ Hazardous Communication Training per 29 CFR 1910
- ✓ Respiratory Protection and Personal Protective Equipment Training per 29 CFR 1910, Subpart 1 and 2
- ✓ First Aid/CPR by the American Red Cross
- ✓ Injury and Illness Prevention Program Training
- ✓ Procedures for the proper Handling and Transportation of Hazardous Material Training, per DOT HM-181, HM-215, and HM126F
- ✓ CGA Transportation of Gases AV-6
- ✓ Forklift Training
- ✓ Sampling and Unknown Testing (HAZCAT)

Before working in the field, Tradebe's Technical Field Service personnel must attend a 16-hour course for the Hazardous Waste Management for Lab Pack Operations. This course covers the following topics:

- |                                            |                             |
|--------------------------------------------|-----------------------------|
| ✓ Regulation Overview (RCRA/CERCLA)        | ✓ Waste Identification      |
| ✓ Selecting a DOT Shipping Description     | ✓ DOT Hazard Class Review   |
| ✓ DOT & EPA Labeling/Marking/Placarding    | ✓ POPS Packaging Standards  |
| ✓ Manifesting & Land Disposal Restrictions | ✓ Hazardous Materials Table |

The personnel must attend a 4-hour Reactive Chemical Recognition course. This course tests the employees on Tradebe's Handling Requirements for Reactive and Explosive Chemicals. This course covers the following topics:

- |                                   |                       |
|-----------------------------------|-----------------------|
| ✓ Temperature Sensitive Chemicals | ✓ Pyrophoric Material |
| ✓ Compressed Gas Cylinders        | ✓ Picric Acid         |
| ✓ Commercial Explosives           | ✓ Ethyl Ether         |

The personnel must also attend a Certified Chemist Training course (8-hour), which tests the staff on the Reactive Chemical Shipping Requirements. Topics covered include:

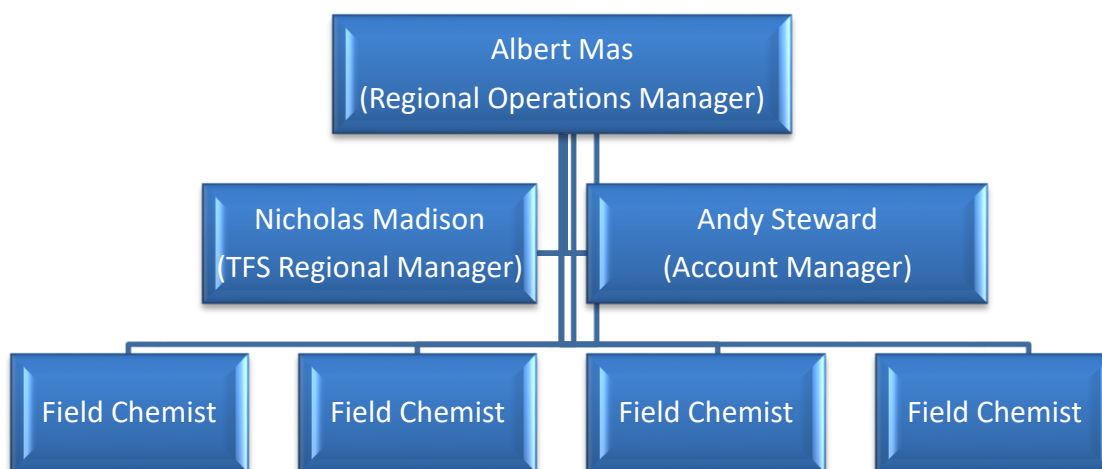
- |                                          |                              |
|------------------------------------------|------------------------------|
| ✓ Organic Peroxide Packaging Guidelines  | ✓ Multi-nitrated Materials   |
| ✓ Tradebe cylinder shipping requirements | ✓ Tradebe Picric Acid Policy |
| ✓ DOT Transportation of cylinders        | ✓ Class 4 Oxidizers          |
| ✓ Compressed Gas Association             | ✓ Azide Materials            |
| ✓ Peroxide Forming Materials             | ✓ Perchloric Acid            |

Most of these procedures were instituted in the original lab-pack manual and have been used successfully without a safety related incident over the course of ten years (over 200,000 samples). These screening procedures, in whole or in part, may be used to provide insight to a material's chemical characteristics. Tradebe's field chemists can often identify the waste material without having to perform these unknown field tests. Less than 10% of all containers initially identified as "Unknown" are packaged and shipped as characterized unknowns. The field personnel use their knowledge of chemicals as well as information from the resident to identify the waste material.



## B.2 SKILLED PERSONNEL

Clear and concise communication between generator and contractor is a crucial factor in the management of hazardous and non-hazardous waste. Pick up requests will be communicated between the designated the Iowa State Coordinator and Nicholas Madison, the TFS Regional Operations Manager in Urbandale. The requests can be communicated by phone 913-514-0549 or email [nicholas.madison@tradebe.com](mailto:nicholas.madison@tradebe.com). The Regional Operations Manager or the Account Manager will be the contact for any questions, concerns, or issues that may arise during the term of the contract. Below is a general command structure.



### *Project Manager*

Nicholas Madison

Phone: 913-514-0549

Email: [nicholas.madison@tradebe.com](mailto:nicholas.madison@tradebe.com)

Responsibilities include, but are not limited to:

- Serve as the primary contact for Iowa State for scheduling pickups and Project Manager during pickups.
- Address any of Iowa State's questions, concerns, or suggestions related to the operations of the event.

### *Account Manager*

Andy Steward

Phone: 515-805-7157

Email: [andy.steward@tradebe.com](mailto:andy.steward@tradebe.com)

Responsibilities include, but are not limited to:

- Serve as a secondary contact for Iowa State and assist Tradebe's Operations Manager with scheduling, and addresses any questions, concerns, or suggestions.

**RESUMES FOLLOW**

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**NAME:** Albert Mas  
**TITLE:** Regional Operations Manager of Technical Services  
**EDUCATION:** BBA in Economics, Universitat Pompeu Fabra, Barcelona, Spain

**PROFESSIONAL DEVELOPMENT**

OSHA 40-hour Training, November 2016  
OSHA 8-Hour Refresher Course, November 2016  
DOT Training, November 2016  
DOT Informational Training, November 2016  
Forklift Certification, November 2016  
High Hazard: Explosives Identification, December 2016  
High Hazard: Reactive Chemical Identification, December 2016  
High Hazard: Remote Opening Training, December 2016  
High Hazard: Safe Handling and Storage of Compressed Gases, December 2016  
High Hazard: Chemical Stabilizations Training, December 2016  
High Hazard: Transportation of Compressed Gases, December 2016  
Lab Pack Field Safety Training, November 2016  
HAZCAT (fingerprint), November 2016  
PPE Guidelines, November 2016

**EXPERIENCE:**

TRADEBE ENVIRONMENTAL SERVICES, Chicago, IL

Regional Operations Manager of Technical Services, November 2016 - Current

- Manage a service business including operations, P&L management and safety for 4 locations in the Midwest
- Leading a team of more than 25 employees that provide responsible, compliant, cost-effective, and environmentally friendly waste management services
- Implementing new analytical tools that lead to cost-effective actions. Business profitability 10% above average in first 3 months.
- Created new bonus plan to boost business growth for key employees

Midwest Senior Financial Analyst, Chicago, IL, September 2014 – October 2016

- Produced and presented new financial analysis reports for the Executive Committee enabling a better understanding of our business lines' profitability.
- Led the annual budgeting process for the organization ensuring that it was developed in line with strategic and operational plans (including capital planning).
- Assisted the Operations department with the analysis and implementation of operational improvements.
- Developed a new Standard Cost to help and support new pricing strategy.
- Monitored and analyzed Key Performance Indicators (KPI) and financial ratios.
- Supported the accounting department during monthly closings.

Oil Services Europe Financial Analyst, Barcelona, Spain, April 2013 – August 2014

- Led the merger of 3 different Financial and Planning Analysis departments for different countries (UK, France, and Spain) into one.
- Responsible for the Business Unit accounting team consisting of 4 people, setting their goals and tracking performances.
- Assisted with the identification of a successful acquisition opportunity in France, leading the following Due Diligence process.
- Created and implemented new pricing models for Refinery Services Business Unit.

Environmental Consultancy & Port Services, Junior Financial Analyst, Barcelona, Spain, August 2010 – March 2014

- Participated in the \$80M Tradebe Port Services Project Finance by creating the Financial Model and helping with the syndicated loan agreement and later follow-up.
- Set up new P&L analysis and presented monthly report to the Executive Committee.
- Designed new project analysis including new time-sheets that led to significant improvement in understanding of Environmental Consultancy business' profitability.
- Implemented corporate structure overseas to help business expansion (accounting, tax, back-office) in Peru and Colombia

Business Development Manager Assistant, Southampton, UK, September 2009 – July 2010

- Helped the UK Business Development Manager identifying market opportunities.
- Assisted with investment and acquisition analysis.

ILV SILVER

M&A Manager Assistant, Internship, June 2008 – August 2009

- Assisted Finance, Accounting, and Legal managers with M&A projects both in Barcelona and Madrid

**NAME:** Nicholas Madison  
**TITLE:** Technical Service Operations Manager  
**EDUCATION:** Bachelor of Science in Physics, University of Missouri, Columbia, MO

## PROFESSIONAL DEVELOPMENT

OSHA 40-hour Training, August 2016  
OSHA 8-Hour Refresher Course  
DOT Training,  
DOT Informational Training,  
Forklift Certification, February 2018  
High Hazard: Explosives Identification  
High Hazard: Reactive Chemical Identification  
High Hazard: Remote Opening Training  
High Hazard: Safe Handling and Storage of Compressed Gases  
High Hazard: Chemical Stabilizations Training  
High Hazard: Transportation of Compressed Gases  
Lab Pack Field Safety Training, Monthly  
HAZCAT (fingerprint),  
PPE Guidelines,  
Class B CDL permits w/Hazmat and Airbrake Endorsements, April 2017

## EXPERIENCE:

TRADEBE ENVIRONMENTAL SERVICES, Urbandale, IA  
Technical Service Operations Manager, April 2019 – Present

- Ensure that all Technical Services operations in our region are conducted in accordance with EPA, OSHA, and DOT regulations.
- Schedule and perform waste shipments for customers in a four state area.
- Coordinate and lead teams of field chemists on site for large university waste shipments.
- Balance budget for Urbandale, IA office as well as P&L Management.

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TRADEBE ENVIRONMENTAL SERVICES, Kansas City, KS

Technical Service Chemist II, August 2016 – April 2019

- Required to segregate, package, and ship hazardous and non-hazardous waste according to state and federal environmental, health, and safety regulations.
- Experience in profiling and RCRA characterization of waste streams.
- Coordinated and lead on-site teams for several large warehouse clean-out projects.
- Main role in special on-site project at Wichita State University; required to fulfill hazardous waste generator responsibilities according to state and federal regulatory agencies.

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**NAME:** Andy Steward

**TITLE:** Account Manager

**EDUCATION:** William Penn University, West Des Moines, IA, Bachelor of Arts in Business

**PROFESSIONAL DEVELOPMENT**

OSHA 40-hour Training,  
OSHA 8-Hour Refresher Course  
DOT Training,  
DOT Informational Training,  
Forklift Certification,  
High Hazard: Explosives Identification  
High Hazard: Reactive Chemical Identification  
High Hazard: Remote Opening Training  
High Hazard: Safe Handling and Storage of Compressed Gases  
High Hazard: Chemical Stabilizations Training  
High Hazard: Transportation of Compressed Gases  
Lab Pack Field Safety Training, Monthly  
HAZCAT (fingerprint),  
PPE Guidelines,  
Class B CDL permits w/Hazmat and Airbrake Endorsements

**EXPERIENCE:**

TRADEBE ENVIRONMENTAL SERVICES, Urbandale, IA

Account Manager, January 2017-Present

- Provide sustainable environmental solutions with focus on sustainability, compliance, and financial aspects in mind
- Provide multiple industry leading avenues for recycling and treatment methods of hazardous waste and non-hazardous waste
- Develop new company growth and opportunity with Des Moines and the surrounding area
- Assist with customer needs through pricing, invoicing, regulatory compliance, and multiple other aspects

NEBRASKA TRANSPORT COMPANY, Des Moines, IA

Terminal Manager/Sales Manager, September 2016-January 2017

- Managed labor to assure operating costs were in line with budgeted and projected revenue, which included management of all employee hours worked, overtime hours worked, hiring, firing, and performance appraisals, along with labor relations in accordance with worker's compensation regulations and laws
- Supervised and directed freight delivery
- Monitored terminal operations for compliance to company policies and safety procedures

- Gave price quotes for freight movement based upon established guidelines
- Monitored and evaluated employee performance
- Delegated and assigned work load
- Maintained and enhanced customer relations
- Monitored and directed special freight movement situations
- Inspected equipment
- Communicated and coordinated freight shipments between terminals
- Monitored and controlled terminal costs
- Scheduled equipment maintenance and repairs
- Picked up and delivered freight
- Performed and coordinated employee training
- Was responsible for developing, coordinating, and maintaining, in accordance with company policies and procedures as well as State and Federal regulations, all local sales activities necessary to achieve service center marketing, pricing, service, growth, customer services, and profit objectives

VALICOR ENVIRONMENTAL SERVICES, Kansas City, MO  
General Manager/Sales Manager, March 2014-September 2016

- Managed labor to assure operating costs were in line with budgeted and projected revenue, which included management of all employee hours worked, overtime hours worked, hiring, firing, and performance appraisals along with labor relations in accordance with worker's compensation regulations and laws
- Managed processing of non-hazardous wastes according to specified requirements including RCRA, DOT, customer requirements, and cost-effective routing
- Gained intimate knowledge of all facility specific capabilities and processing technologies including, but not limited to, wastewater treatment, fuels blending, blending, bulking, pumping
- Implemented, executed, and ensured compliance with the company's health, safety and environmental policies and procedures
- Built capability of site resources to support implementation of HSE programming.
- Led incident investigation process, including root cause analysis and identification of corrective action plans. Interface with regulatory bodies (OSHA, EPA, and State/Local Regulators)
- Facilitated the completion of a site-wide or field annual HSE training plan
- Ensured that required regulatory permits are acquired, that reports are submitted to regulatory agencies, and any site permit conditions (e.g. sampling, recordkeeping) are met
- Achieved annual targets for incident frequency, severity and related cost reductions.
- Drove decisions that optimize total delivered cost, inventory, and lead time performance on strategic and operational levels
- Determined annual unit and gross-profit plans by implementing marketing strategies; analyzing trends and results
- Established sales objectives by forecasting and developing annual sales quotas for regions and territories; projecting expected sales volume and profit for existing and new products
- Implemented national sales programs by developing field sales action plans.
- Maintained sales volume, product mix, and selling price, by keeping current with supply and demand, changing trends, economic indicators, and competitors
- Established and adjusted selling prices by monitoring costs, competition, and supply and demand
- Completed national sales operational requirements by scheduling and assigning employees; following up on work results
- Maintained sales staff by recruiting, selecting, orienting, and training employees.
- Maintained sales staff job results by counseling and disciplining employees, planning, monitoring, and appraising job results

- Maintained professional and technical knowledge by attending educational workshops, reviewing professional publications, establishing personal networks, and participating in professional societies
- Contributed to team effort by accomplishing related results as needed

VALLEY ENVIRONMENTAL SERVICES, Newton, IA  
General Manager, October 2009-March 2014

- Managed labor to assure operating costs were in line with budgeted and projected revenue, which included management of all employee hours worked, overtime hours worked, hiring, firing, and performance appraisals along with labor relations in accordance with worker's compensation regulations and laws
- Managed processing of non-hazardous wastes according to specified requirements including RCRA, DOT, customer requirements, and cost-effective routing
- Gained intimate knowledge of all facility specific capabilities and processing technologies including, but not limited to; wastewater treatment, fuels blending, blending, bulking, and pumping
- Implemented, executed, and ensured compliance with the company's health, safety and environmental policies and procedures
- Built capability of site resources to support implementation of HSE programming
- Led incident investigation process, including root cause analysis and identification of corrective action plans to interface with regulatory bodies (OSHA, EPA, and State/Local Regulators)
- Facilitated the completion of a site-wide or field annual HSE training plan
- Ensured that required regulatory permits were acquired, reports were submitted to regulatory agencies, and any site permit conditions (e.g. sampling, recordkeeping) were met
- Achieved annual targets for incident frequency, severity, and related cost reductions
- Drove decisions that optimized total delivered cost, inventory, and lead time performance on strategic and operational levels

**NAME:** Chabi Seidou

**TITLE:** Field Chemist

**EDUCATION:** Iowa State University, Ames, IA, Bachelor of Science in Chemistry

**PROFESSIONAL DEVELOPMENT**

OSHA 40-hour Training, Feb. 2019  
OSHA 8-Hour Refresher Course  
DOT Training,  
DOT Informational Training, Feb. 2019  
Forklift Certification,  
High Hazard: Explosives Identification  
High Hazard: Reactive Chemical Identification  
High Hazard: Remote Opening Training  
High Hazard: Safe Handling and Storage of Compressed Gases  
High Hazard: Chemical Stabilizations Training  
High Hazard: Transportation of Compressed Gases  
Lab Pack Field Safety Training, Monthly  
HAZCAT (fingerprint),  
PPE Guidelines,  
Class B CDL permits w/Hazmat and Airbrake Endorsements

**EXPERIENCE:**

TRADEBE ENVIRONMENTAL SERVICES, Urbandale, IA



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Field Chemist, February 2019-Present

- Characterize, segregate, pack, label, and prepare waste drums for pick-up and transport from customer locations.
- Administrative tasks and paperwork as it relates to transportation of hazardous and non-hazardous wastes (Packing lists, waste characterization forms, land disposal restriction forms, manifests, etc.)
- Directly interface with clients to ensure customer satisfaction by understanding customers' specific disposal and packaging requirements.
- Ensure that Health and Safety is the number one priority by complying with all safe work practices, policies, and processes and acting in a safe manner at all time.

BASF, Sorgues, France

Chemist Intern, Summer 2017

- Cleanliness verification analysis of gas, water, solvent, and hydraulic fluid samples
- Preparation, sampling, and analysis of samples for nonvolatile residue and particulates –
- Generation and review of lab reports.

DANFOSS, Ames, IA

Production Operator, August 2017- August 2018

- Work load consist to coordinate parts, assemble, test, paint, package, and ship company

DURHAM SCHOOL SERVICE, Iowa City, IA

School Bus Driver, August 2013 - August 2017

- Operate school bus in a safe and efficient way according to all relevant legislation, and policies.
- Pick up and deliver students as per a set schedule.
- Maintain order and discipline on the School bus.
- Make note of any behavioral or disciplinary problem

DB Schenker, West Branch, IA

Forklift Operator, Fall 2011 – May 2013

- Operated order picker and forklift in and around warehouse
- Pulled product from the warehouse for shipment to the stores
- Loaded and unloads shipments, pallets, etc.
- Placed shipments on racking systems.

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**NAME:** Stephen Marak

**TITLE:** Field Chemist

**EDUCATION:** Wartburg College, Waverly, IA -Bachelor of Arts, Chemistry

**PROFESSIONAL DEVELOPMENT**

OSHA 40-hour Training, June 2018

OSHA 8-Hour Refresher Course, Dec. 2018

DOT Training,

DOT Informational Training, June 2018

Forklift Certification,

High Hazard: Explosives Identification

High Hazard: Reactive Chemical Identification

High Hazard: Remote Opening Training

High Hazard: Safe Handling and Storage of Compressed Gases



High Hazard: Chemical Stabilizations Training  
High Hazard: Transportation of Compressed Gases  
Lab Pack Field Safety Training, Monthly  
HAZCAT (fingerprint),  
PPE Guidelines,  
Class B CDL permits w/Hazmat and Airbrake Endorsements

**EXPERIENCE:**

TRADEBE ENVIRONMENTAL SERVICES, Urbandale, IA  
Field Chemist, June 2018 - Present

- Identified, packaged, and shipped hazardous chemical waste; generated paperwork for shipping and disposing of the waste; drove a Class B CDL straight truck

WARTBURG-WAVERLY SPORTS & WELLNESS CENTER, Waverly, IA  
Janitor, August 2014 - May 2018

- Maintained the gyms used for large sporting events

USDA MILK ADMINISTRATION OFFICE, Des Moines, IA  
Laboratory Intern, May 2017 - August 2017

- Tested samples using Milkoscan FT +, FT 100, and UV Spectrometer; made and used bioassays to test lactose and Milk Urea Nitrogen, performed ether extractions, assisted in calibrating milk tanks, worked with Windows Access and other data programs, and assisted in sorting, packaging and shipping milk samples.

**NAME:** Nathan Wiseman  
**TITLE:** Lead Energetics Chemist  
**EDUCATION:** Purdue University, Natural Resources and Environmental Sciences/ Air Quality Control and Design, Bachelor of Science May 1998

**CERTIFICATES:**

- OSHA 40 hour Hazwoper Training (with up to date refresher)
- DOT general awareness, function-specific, safety and security awareness training
- Certified Safety Training Specialist
- Safety Planning Specialist
- Hazwoper Training Specialist
- Highway Emergency Response Specialist
- Asbestos Abatement Project Supervisor
- Visible Opacity Reader
- International Society of Explosives Engineers Blaster Training
- Radiological Worker II Practical Factors Training
- EPA Universal Refrigerant Training

**EXPERIENCE:**

*Tradebe Treatment and Recycling, LLC, East Chicago, IN*  
Energetics Field Manager, May 2014 - present

- ❑ Responsible for the compressed gas cylinder remediation program
- ❑ *Stabilized energetic materials for transportation disposal*

*Lead Energetics Chemist, February 2013- May 2014*

- ❑ Remotely opens and stabilizes chemicals on customer sites
- ❑ Decommissions and disposes of compressed gas cylinders at Tradebe Treatment and Recycling
- ❑ Manages compressed gas cylinder recycling efforts for scrap yards.

*Reactives Division Supervisor, May 2004 – September 2005*

- ❑ Responsible for the compressed gas cylinder remediation program
- ❑ Stabilized energetic materials for transportation disposal.

*Lab Pack Chemist, May 1998 – May 2003*

- ❑ Prepared lab chemicals for transportation and disposal
- ❑ Worked with the household hazardous waste program
- ❑ Responsible for all waste tracking for a Delphi Delco Electronics facility

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**NAME:** Kyle Carlson

**TITLE:** Technical Service Specialist

**EDUCATION:** Bachelor of Science in Geophysics, University of Wisconsin - Milwaukee

**PROFESSIONAL DEVELOPMENT**

40-hour HAZWOPER  
OSHA 8-Hour Refresher Course  
Class B CDL with Hazardous Waste  
RCRA and DOT Certification  
PPE Guidelines

**EXPERIENCE:**

Tradebe Environmental Services, LLC, Merrillville, IN

Technical Services Specialist, April 2019 – Present

- Identify, segregate, package, and ship hazardous waste in accordance with RCRA/DOT regulatory standards
- Complete all necessary shipping documentation (i.e. waste manifest, LDR, Drum Inventory Form, etc.)
- Transport waste containers off-site to designated receiving facilities
- Assist generators with the completion of Waste Profile forms for new waste streams
- Serve as Site Supervisor at household hazardous waste collections.
- Perform drum sampling at receiving facility to ensure compliance before disposal

Veolia Environmental Services Technical Solutions, Menomonee Falls, WI

Environmental Specialist, October 2018 – April 2019

- Performed hazardous waste lab packing in accordance with 49 CFR, segregated material to DOT class along with lab pack exemptions.
- Responsibilities include manifesting, packaging, spill response, labeling, coordinating transportation, and sampling/profiling waste stream material while adhering to state and federal environmental, health, and safety regulations.
- Provided specialized knowledge regarding HAZMAT Field Operations

Military and Veterans Resource Center, Milwaukee, WI

Resource Officer, August 2016 – December 2019

- Maintained knowledge of veterans related services and benefits to assist and direct student veterans.

- Provided team support for community engagement events focused on assisting veterans' organizations in fund raising.

#### United States Army

19K Armor Crewmen/19D Cavalry Scout, December 2007 – January 2013

- Armor Crewman Gunner, Team Leader in Overseas Combat Operations, Tactical Operations Center Coordinator, Training Room Coordinator
- Maintained personal files and records for 250 plus service members
- Supervised teams of 2-10 members while completing impromptu and planned projects
- Processed Commander's monthly reports and all administrative actions such as payroll, awards, and adverse actions.
- Awards receive include Purple Heart, Army Service Ribbon, National Defense Service Medal, Good Conduct Medal, Army Achievement Medal

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**C. TRADEBE REFERENCES**

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**Iowa State University**

3616 Administrative Services

Ames, IA 50011

**Contact:** Bill Diesslin Iowa State University, Associate Director - EH&S**Phone:** 515-294-2105**Email:** [wmdiess@iastate.edu](mailto:wmdiess@iastate.edu)**Contract Amount:** \$100,000 - \$120,000 yearly**Contract Period and/or Term:** July 1, 2015 until June 30, 2018 with an option to renew 2 additional one year periods.**Scope of Services:** Lab Packing, Bulk Shipment preparation.**University of Illinois of Chicago**

1129 S. Hermitage Ave.

Chicago, IL 60612

**Contact:** Tom Johnson**Phone:** (312) 413-2436**Email:** [heather9@uic.edu](mailto:heather9@uic.edu); [tjohns16@uic.edu](mailto:tjohns16@uic.edu)**Contract Amount:** \$275,000 annually**Contract Period and/or Term:** July 1, 2017 - June 30, 2018 and 2x 1Yr renewals**Scope of Services:** Tradebe provides for the removal, transportation, and disposal of chemical waste. Tradebe-East Chicago IN facility mobilizes a Technical Services Team, consisting of a team of Field Chemists, to perform routine LTL's, lab packing, high hazard and cylinder management services at main campus facilities and outlying or remote campus for the university every six weeks.**University of Illinois Urbana-Champaign**

Division of Environmental Health and Safety

102 EHSB

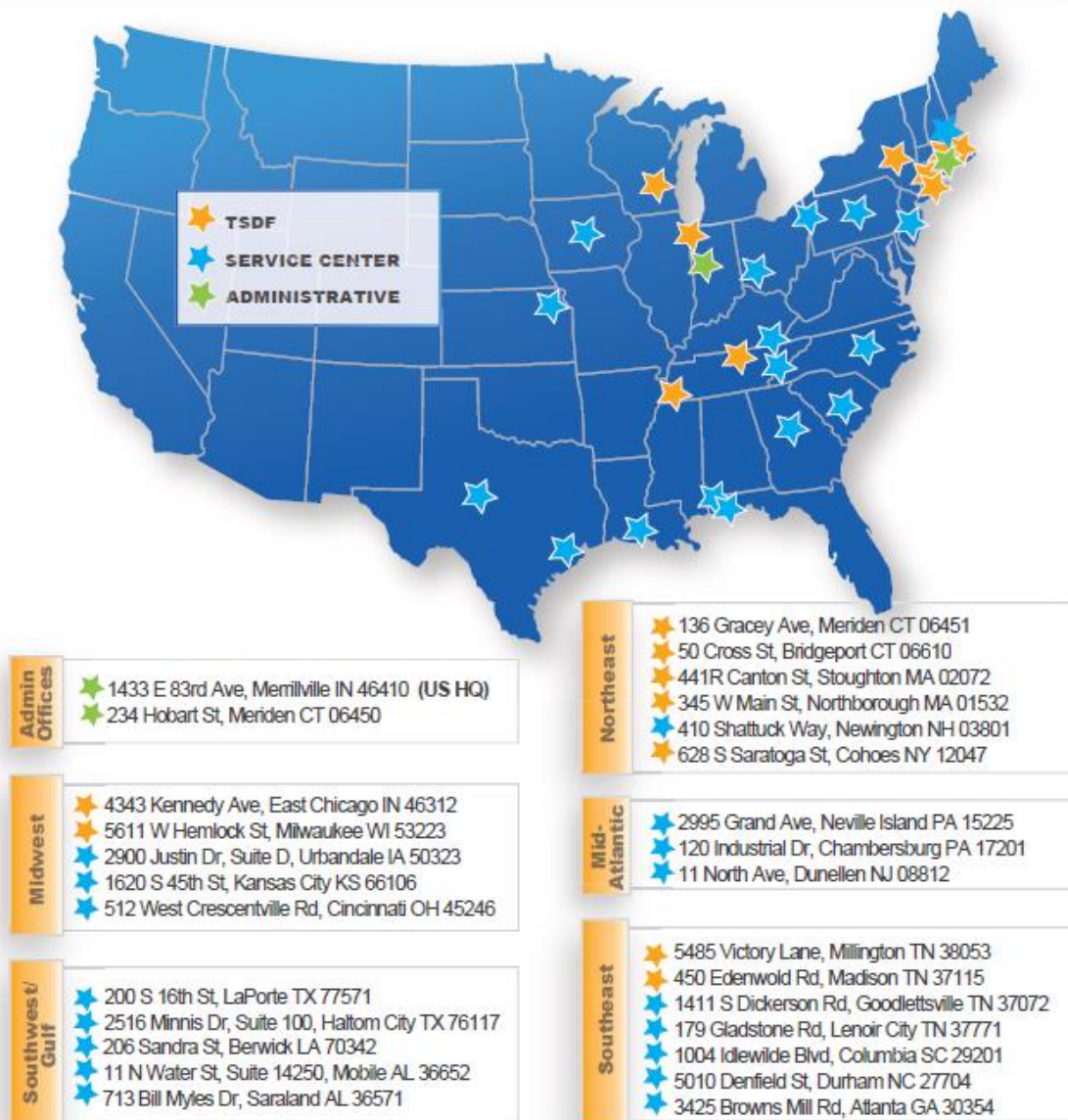
101 S. Gregory St.

M/C 225

Urbana, IL 61801

**Contact:** David Scherer, Assistant Director of Environmental**Phone:** (217) 244-7605**Email:** [scherer@illinois.edu](mailto:scherer@illinois.edu)**Contract Amount:** \$1,000,000.00 annually**Contract Period and/or Term:** July 1, 2017 - June 30, 2018**Scope of Services:** Tradebe provides for the removal, transportation, and disposal of chemical waste. Tradebe-East Chicago IN facility mobilizes a Technical Services Team, consisting of a team of Field Chemists, to perform routine LTL's, lab packing, high hazard and cylinder management services at main campus facilities and outlying or remote campus for the university once a month.

## D. TREATMENT, STORAGE, AND DISPOSAL FACILITIES



**(800) 388-7242**  
www.tradebeusa.com



Tradebe's strategy to reduce carbon footprint and fossil fuel use<sup>1</sup>:

Protecting the earth through sound waste management has been the focal point of our business since 1986. Every step we take, every innovation we pioneer, every resource we recycle reduces greenhouse gases and lowers carbon footprints for our customers nationwide. Tradebe's strategy to reduce carbon footprint and fossil fuel use includes:

- **Solid Distillation System (SDS)** – This recycling process is an alternative to incineration. It recycles organic compounds and metal. It generates less CO<sub>2</sub> emissions than incineration.
- **Recycling of solvents** – This saves raw materials, use of crude oil to manufacture solvents and reduces CO<sub>2</sub> emissions from the manufacturing process
- **Fuel blending** – When organics or solvents cannot be recycled or processed through SDS, they are blended into a fuel substitute that is used by cement kilns, replacing fossil fuels

Tradebe preferred methods for waste management is in the favored order of recycling/reuse, treatment, incineration and lastly landfill. Tradebe is committed to disposing of waste materials accordingly whenever possible. Tradebe strives to make waste management cost-effective while at the same time matching the client's desire for the safe and responsible management of their waste.

Tradebe strives to collect, process, recycle, reclaim, treat, or dispose of hazardous and non-hazardous wastes in the most responsible manner possible while protecting both human health and the environment. Tradebe's preferred waste management method is using the Solid Distillation System (SDS). High BTU, solid hazardous waste may be recycled through SDS or shipped off-site to waste to energy facilities. Tradebe continues to diversify by expanding its capabilities and processes to meet the waste management needs of its customer base.

### **Solid Distillation System (SDS)**

In 2004, Tradebe pioneered a new patented recycling technology, called the Solids Distillation System (SDS) at our East Chicago, IN TSD facility. The SDS allows Tradebe to process and recover solvents from a solid matrix. The SDS system is the only technology in the US which offers generators an effective and cost-efficient method for recycling organic solid waste that might otherwise be disposed of in a hazardous waste incinerator. The SDS systems work to extract the organics from the waste matrix to recover a viable, reusable product. The process is unique because unlike other thermal processes, the material never contacts the heat source. It is baked rather than burned and the baking drives off volatile and semi-volatile organics. The volatile organics are condensed back to a liquid form and are reclaimed and recycled. The entire system operates with an emission control system to prevent any organic gases or vapors from being released to the environment. IDEM has designated the SDS as a recycling process and therefore all materials it processes receive a Certificate of Recycling. Hazardous waste processed through the SDS units receive an H020 solvent recovery handling code, which may allow generators to receive recycling credits with state regulatory agencies.

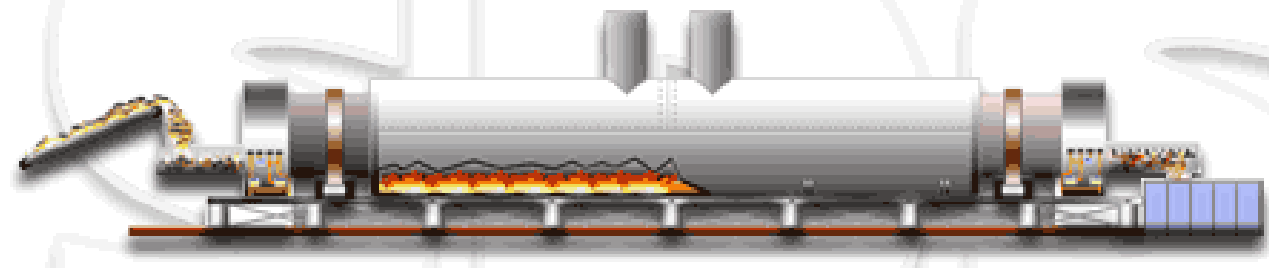
In the spring of 2015, Tradebe advanced our capabilities in solvent recycling commissioning the new SDS2 processing unit. The new unit also located in East Chicago has approximately twice the capacity of the original SDS unit. Both units are currently operational and will be operated concurrently. The SDS units will annually process 36,000+ tons of hazardous waste, reclaiming 7,000+ tons of scrap metal and producing 2.75 MM+

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<sup>1</sup> **Carbon footprint is the overall amount of carbon dioxide and other greenhouse gas emissions associated with a product along its supply-chain and sometimes including use and end-of-life recovery and disposal. Causes of these emissions are, for example, electricity production in power plants, heating with fossil fuels, transport operations, and other industrial and agricultural processes.** (Source: EU, European Platform on Life Cycle Assessment)

gallons of reusable solvents. Wastes suitable for the SDS units include Paints, Resins, Polymers, Solvent-soaked Rags, paint filters and other organic solvent containing debris.

Our Solid Distillation System is a self-contained, indirectly-heated, rotating processing chamber that uses an anaerobic atmosphere to remove volatile and semi-volatile organic compounds from solid waste. SDS eliminates oxidation and the formation of hazardous compounds. In addition to the environmentally friendly nature of the process, the SDS system offers many other advantages over typical direct-flame systems.



SDS advantages include:

- SDS can effectively process any solid waste containing organic compounds.
- SDS helps generators meet the Environmental Management Systems objectives.
- SDS prevents pollution while promoting recycling and reuse.
- SDS helps customers meet USEPA's RCRA Conservation Challenge.
- SDS eliminates the release of hazardous constituents into the atmosphere.
- SDS conserves energy and materials while keeping waste out of the environment.

### **Fuel Blending**

When organics or solvents cannot be recycled or processed through SDS, they are blended into a fuel substitute that is used by cement kilns, replacing fossil fuels

As a premier treatment and recycling company, Tradebe has the ability to take materials that are traditionally incinerated and process them into fuels, affording our customers the economic benefits from this reclassification of waste. Tradebe utilizes our labpack depack facility to bulk small containers of compatible organic liquids with a latent energy content into drums. The bulked liquids along with other containerized organic liquids and sludge materials are bulked via a vacuum system in our fuels bulking building. The bulked liquids and entrained solids are blended into a uniform mixture and transferred to an onsite tank farm. The bulk material is blended to meet final fuel specifications before burning for energy recovery. All fuel blending operations are conducted with emissions control and organic vapor collection to ensure no release of vapor or organic compounds to the environment. The bulked materials are shipped via tank truck or rail car to third-party cement kilns or our lightweight aggregate kiln to be burned for energy recovery as a substitute for fossil fuels. The combustion of organic hazardous wastes at high temperatures in cement kilns is the Best Demonstrated Available Technology (BDAT) for treating high BTU hazardous wastes.

### **Waste to Energy Thermal Treatment**

Tradebe has multiple facilities that provide a thermal treatment option for non-regulated waste. Consumer commodities and other containerized non-regulated wastes are shredded, bulked and blended to create a bulk solid material suitable for use as an alternate fuel in a waste to energy plant. The material is shipped to facilities burn non-regulated industrial wastes and municipal solid waste to generate electricity. The electricity is sold to municipalities and/or industrial customers industries. The waste-to-energy option will ensure consumer commodities are destroyed by removing liability for the generator and also provide a reduction in overall



greenhouse gas emissions by replacing the use of fossil fuels for electricity generation. This process also provides a low cost option to landfills for customers with goals to reduce or eliminate the use of landfill disposal.

### **Cylinder Processing**

Tradebe's Energetic Program offers compressed gas cylinder identification and disposal services. Tradebe's East Chicago TSDF can process many types of reactive and flammable cylinders. Tradebe's cylinder processing unit operates a liquid cooled chemical reactor with multiple scrubbing filter systems to process material in-house. Materials are treated by neutralization, recovery for reuse, and reaction with reagents to produce inert materials. Tradebe's trained staff also has the ability to identify cylinders with no visible markings or labels ensuring the transportation and disposal of each item is completed following regulations from the Department of Transportation and the Environmental Protection Agency.

#### **Cylinder Building Main Components:**

- **Reactor:** cylinders downloaded into Reactors' Solvents
- **Venturi Scrubber:** Inorganic scrubber system that has a snorkel hooked directly to it to capture any fugitive vapors
- **Wet Scrubber:** Inorganic scrubber system that captures Reactors' vapors
- **Carbon Scrubber:** Organic scrubber system that contains activated carbon to capture all organic vapors

### **Thermal Treatment**

Waste that is highly toxic or reactive and cannot be safely managed by any other treatment method is sent for incineration. Thermal destruction involves the use of high temperature to break down toxins and sterilize waste.

Examples of waste that may go for incineration include:

- Poison inhalation hazards
- Strong toxics that are unable to be treated such as Strychnine
- Flammable solids that cannot be fueled (non D003 Metal Powders)
- Spontaneously combustible material (Sodium Dithionite)
- Reactive materials carrying a D003 (e.g. Wetted Picric Acid)
- Dangerous when wet materials (alkali metals and alkali earth metals, e.g. Potassium)

### **Waste Water Treatment**

Tradebe employs state-of-the-art technologies that cost-effectively remove metals, organic compounds and other contaminants from water. These specialized processes require a high level of expertise and constant monitoring to ensure the quality of our effluent.

Tradebe can handle any wastewater need:

- Industrial Process Wastewater
- Oil/Water Separator Waste & Sludge
- Food Processing Waste
- Petroleum Contaminated Waste
- Petroleum Contact Water
- Textile Runoff
- Chemical Wastes

- Remediation Waste
- Other Waste Liquids

Our network of regional collection and processing facilities allow Tradebe to fully support all of your wastewater removal needs. We will work with you to develop a comprehensive wastewater management plan that includes regularly scheduled pickups (based on volume), proper handling and assistance with paperwork to meet government regulations.

### **Stabilization**

Characteristic hazardous wastes that carry the D001 (for oxidizing wastes only), D002, D004-D011 codes and do not contain underlying hazardous constituents with concentrations above the universal treatment standards and those which are also exempt from sub part CC regulations (<500 ppm voc) are acceptable materials for Tradebe's chemical stabilization process. Typical waste includes heavy metal compounds, acids, and acid sludges, electrical/electronic waste, inorganic chemical and petrochemical waste, incinerator, boiler, and industrial furnace residues, multi-source leachates, general debris, and inorganic waste containing <30% oil and grease.

The basic stabilization operation immobilizes the leachable metals by combining the waste with stabilization agents such as lime or cement kiln dust. The process produces non-hazardous cement-like material. These chemical bonding agents form a solid structure around the waste that binds the contaminated material into a solid, non-leachable mass. Acid and caustic wastes are neutralized and oxidizers will be reduced.

### **Other Recycling**

#### **Battery Recycling**

Tradebe collects, segregates, and transports Lead Acid, Nickel Cadmium, Alkaline, Mercury, and other various batteries to our audited and approved battery recycling facilities for metals reclamation.

#### **Antifreeze Recycling**

Tradebe has audited and approved facilities for the reclamation of spent ethylene-based and other glycol-based Antifreeze.

#### **Non-Regulated Oil**

Tradebe has audited and approved recycling facilities for the recovery of non-regulated oil.

#### **Fluorescent Bulb Recycling**

Tradebe has audited and approved various facilities for the recycling of fluorescent lamps. The lamps are crushed, sieved, and processed through distillation to recapture the mercury. The remaining glass and metals are recycled.

### **Tradebe Treatment and Recycling, LLC**

4343 Kennedy Avenue  
East Chicago, IN 46312  
Phone: (219) 397-3951  
Fax: (219) 769-6019

**EPA ID #: IND000646943**

**Treatment Processes: Fuel Blending, Solid Distillation, Liquid Distillation, Hazardous Waste Stabilization, Non-Hazardous Waste processing and Solidification, Lab pack Consolidation**

The Indiana facility sits on approximately 12 acres in a heavy industrial section of East Chicago and is approximately 20 miles south of downtown Chicago, Illinois. Tradebe's neighbors include a commercial gas manufacturer, a rail-yard, and a vacant aluminum smelting facility. The closest water stream is the Indiana Harbor Canal, which is approximately 2,700 feet west of the facility. The majority of the property is dedicated to serving Tradebe's waste management operations. Also located on the facility's property is a rail-line that accommodates up to ten rail cars.

EPA Region V and the Indiana Department of Environmental Management (IDEM) originally issued the Part B RCRA permit in 1991. The facility currently has storage capacity for up to 4,508 "55-gallon drum equivalent" containers of hazardous waste. With the issuance of the renewed permit, permitted drum capacity increases to 11,000 drums. Tradebe's operation includes a 165,000-gallon tank farm, a newly redesigned state-of-the-art lab pack/depack facility, a drum consolidation and handling building, and a non-hazardous processing building with 45,327 gallons of bulk treatment capacity. The company's laboratory and receiving area are capable of accepting and analyzing up to 2,000 drums per day. The Part B facility has the capability of receiving up to 30,000 drums per month. Tradebe recently acquired an adjacent 8-acre site, which serves as a transfer yard for incoming and outgoing waste and potential expansion of the East Chicago operations.

and non-hazardous processing area. Looking to the future, Tradebe-Tennessee has permitted approval to build and operate an SDS unit. Tradebe employs approximately 300 people between the two facilities.

## **E. TRANSPORTATION OF WASTES**

### **Transporter Information**

Upon completion of event, all waste collected and packaged will be loaded by Tradebe personnel upon the vehicle safely and securely following all state and DOT guidelines.

<b>Transporter</b>	<b>US DOT #</b>	<b>EPA ID #</b>
Tradebe Transportation, LLC	446276	INR000123497

Tradebe offers its customers transportation services that can accommodate all of their transportation waste management needs. Tradebe's Transportation Department offers reliable less-than-truckload (LTL) and full load waste pickup services nationwide. Tradebe maintains a fleet of tractors, trailers, tankers, Lab Pack vehicles, and roll-off containers to handle customer pick-ups and off-site disposal of their waste material. Tradebe chemists possess a class B CDL which allows them to transport the waste safely back to our facility.

Our Equipment can handle your waste

- 48' Box Trailers
- 48' Trailers with a lift gate
- Bulk Cargo Tankers
- Vacuum Tankers

- Roll Off Boxes
- End Dumps
- Straight Trucks with a lift gate and more.

## F. PERMITS AND CERTIFICATIONS

Tradebe has obtained the necessary permits, licenses, and certificates to legally handle, transport, and dispose of hazardous and non-hazardous waste material. Please see the attached:

- ✓ State of Tennessee Hazardous Waste Management Permit (RCRA part B permit)
- ✓ State of Indiana Hazardous Waste Management Permit (RCRA part B permit)
- ✓ U.S. DOT Hazardous Materials Certificate of Registration

### QUICK FACILITY INFORMATION

<u>Facility</u>	<u>Facility Type</u>	<u>EPA ID Number</u>
East Chicago, IN	TSDf	IND000646943

### TRANSPORTER INFORMATION

<u>Transporter</u>	<u>US DOT #</u>	<u>EPA ID Number</u>
Tradebe Transportation, LLC.	446276	INR000123497

## STATE OF INDIANA HAZARDOUS WASTE MANAGEMENT PERMIT

Tradebe Treatment and Recycling, LLC  
IND000646943  
Page 1 of 48INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
HAZARDOUS WASTE MANAGEMENT PERMITName of Permittee: Tradebe Treatment and Recycling, LLCFacility Location: 4343 Kennedy Avenue, East Chicago, IndianaEPA Identification Number: IND000646943Issuance Date: April 28, 2017Expiration Date: April 28, 2022Authorized Activities

Pursuant to Indiana Environmental Statutes (IC 13) and the rules promulgated thereunder and codified in Title 329 of the Indiana Administrative Code, Article 3.1 (329 IAC 3.1), the State permit conditions (hereinafter called the permit) of the Resource Conservation and Recovery Act of 1976 (RCRA) permit are issued to Tradebe Treatment and Recycling, LLC (hereinafter called the Permittee or Tradebe) to operate a hazardous waste facility located in East Chicago, Indiana, Section 28, Township 37 North, Range 9 West at latitude 41° 38' N and longitude 87° W, Whiting Quadrangle, on the U.S. Geological Survey topographic map.

The State RCRA program is authorized under 40 CFR Part 271 and Section 3006 of RCRA to administer the hazardous waste management program in lieu of the Federal program, including administration of most of the Hazardous and Solid Waste Amendments (HSWA) of 1984.

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



**HAZARDOUS MATERIALS  
CERTIFICATE OF REGISTRATION  
FOR REGISTRATION YEAR(S) 2020-2021**

**Registrant:** TRADEBE TRANSPORTATION LLC

ATTN: Louie Spiru  
1433 E 83RD AVE, SUITE 200  
MERRILLVILLE, IN 46410

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

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

**Reg. No:** 050420550046C    **Effective:** July 1, 2020    **Expires:** June 30, 2021

**HM Company ID:** 55690

**Record Keeping Requirements for the Registration Program**

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

- (1) A copy of the registration statement filed with PHMSA; and
- (2) This Certificate of Registration

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

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

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



<p><b>Form W-9</b> (Rev. October 2018) Department of the Treasury Internal Revenue Service</p>	<p><b>Request for Taxpayer Identification Number and Certification</b></p> <p>► Go to <a href="http://www.irs.gov/FormW9">www.irs.gov/FormW9</a> for instructions and the latest information.</p>	<p><b>Give Form to the requester. Do not send to the IRS.</b></p>
<p>1 Name (as shown on your income tax return). Name is required on this line; do not leave this line blank.</p> <p><b>Tradebe Environmental Services, LLC</b></p>		
<p>2 Business name/disregarded entity name, if different from above</p>		
<p>Print or type. See Specific Instructions on page 3.</p>	<p>3 Check appropriate box for federal tax classification of the person whose name is entered on line 1. Check only <b>one</b> of the following seven boxes.</p> <p> <input type="checkbox"/> Individual/sole proprietor or single-member LLC               <input type="checkbox"/> C Corporation               <input type="checkbox"/> S Corporation               <input type="checkbox"/> Partnership               <input type="checkbox"/> Trust/estate  <input checked="" type="checkbox"/> Limited liability company. Enter the tax classification (C=C corporation, S=S corporation, P=Partnership) ► <b>C</b>  <small>Note: Check the appropriate box in the line above for the tax classification of the single-member owner. Do not check LLC if the LLC is classified as a single-member LLC that is disregarded from the owner unless the owner of the LLC is another LLC that is not disregarded from the owner for U.S. federal tax purposes. Otherwise, a single-member LLC that is disregarded from the owner should check the appropriate box for the tax classification of its owner.</small>  <input type="checkbox"/> Other (see instructions) ►         </p>	
	<p>4 Exemptions (codes apply only to certain entities, not individuals; see instructions on page 3):</p> <p>Exempt payee code (if any) _____</p> <p>Exemption from FATCA reporting code (if any) _____</p> <p><small>(Applies to accounts maintained outside the U.S.)</small></p>	
	<p>5 Address (number, street, and apt. or suite no.) See instructions.</p> <p><b>1433 E 83rd Avenue, Suite 200</b></p>	
	<p>6 City, state, and ZIP code</p> <p><b>Merrillville, IN 46410</b></p>	
<p>7 List account number(s) here (optional)</p>		
<p>8 Requester's name and address (optional)</p>		

### Part I Taxpayer Identification Number (TIN)

Enter your TIN in the appropriate box. The TIN provided must match the name given on line 1 to avoid backup withholding. For individuals, this is generally your social security number (SSN). However, for a resident alien, sole proprietor, or disregarded entity, see the instructions for Part I, later. For other entities, it is your employer identification number (EIN). If you do not have a number, see *How to get a TIN*, later.

**Note:** If the account is in more than one name, see the instructions for line 1. Also see *What Name and Number To Give the Requester* for guidelines on whose number to enter.


Social security number									
				-					
or									
Employer identification number									
0	1			-	0	7	5	7	9
								2	1

### Part II Certification

Under penalties of perjury, I certify that:

- The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me); and
- I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding; and
- I am a U.S. citizen or other U.S. person (defined below); and
- The FATCA code(s) entered on this form (if any) indicating that I am exempt from FATCA reporting is correct.

**Certification instructions.** You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and generally, payments

<b>Sign Here</b>	Signature of U.S. person ► 	Date ► <b>1/2/20</b>
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### General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.

**Future developments.** For the latest information about developments related to Form W-9 and its instructions, such as legislation enacted after they were published, go to [www.irs.gov/FormW9](http://www.irs.gov/FormW9).

### Purpose of Form

An individual or entity (Form W-9 requester) who is required to file an information return with the IRS must obtain your correct taxpayer identification number (TIN) which may be your social security number (SSN), individual taxpayer identification number (ITIN), adoption taxpayer identification number (ATIN), or employer identification number (EIN), to report on an information return the amount paid to you, or other amount reportable on an information return. Examples of information returns include, but are not limited to, the following.

- Form 1099-INT (interest earned or paid)


- Form 1099-DIV (dividends, including those from stocks or mutual funds)
- Form 1099-MISC (various types of income, prizes, awards, or gross proceeds)
- Form 1099-B (stock or mutual fund sales and certain other transactions by brokers)
- Form 1099-S (proceeds from real estate transactions)
- Form 1099-K (merchant card and third party network transactions)
- Form 1098 (home mortgage interest), 1098-E (student loan interest), 1098-T (tuition)
- Form 1099-C (canceled debt)
- Form 1099-A (acquisition or abandonment of secured property)

Use Form W-9 only if you are a U.S. person (including a resident alien), to provide your correct TIN.

If you do not return Form W-9 to the requester with a TIN, you might be subject to backup withholding. See *What is backup withholding*, later.



**G. CERTIFICATE OF INSURANCE**

ACORD®		<b>CERTIFICATE OF LIABILITY INSURANCE</b>		DATE(MM/DD/YYYY) 08/04/2020																																																																																																																																																																			
<p><b>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.</b></p> <p><b>IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).</b></p>																																																																																																																																																																							
<b>PRODUCER</b> Aon Risk Services Central, Inc. Chicago IL Office 200 East Randolph Chicago IL 60601 USA			<b>CONTACT</b> PHONE (A/C No. Ext): (866) 283-7122      FAX (A/C No.): (800) 363-0105 E-MAIL ADDRESS:																																																																																																																																																																				
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<p><b>COVERAGES</b>      <b>CERTIFICATE NUMBER: 57008344145</b>      <b>REVISION NUMBER:</b></p> <p>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.      <b>Limits shown are as requested</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>INSUR</th> <th>TYPE OF INSURANCE</th> <th>ADU</th> <th>SUB</th> <th>POLICY NUMBER</th> <th>POLICY EFF</th> <th>POLICY EXP</th> <th colspan="2">LIMITS</th> </tr> <tr> <th>LTR</th> <th></th> <th>INSR</th> <th>WD</th> <th></th> <th>(MM/DD/YYYY)</th> <th>(MM/DD/YYYY)</th> <th></th> <th></th> </tr> </thead> <tbody> <tr> <td>B</td> <td> <input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY  <input type="checkbox"/> CLAIMS-MADE      <input checked="" type="checkbox"/> OCCUR                        GEN/AGGREGATE LIMIT APPLIES PER:  <input type="checkbox"/> POLICY      <input checked="" type="checkbox"/> PRO-JECT      <input type="checkbox"/> LOC                      OTHER:                 </td> <td></td> <td></td> <td>US00077228LI19A</td> <td>12/31/2019</td> <td>12/31/2020</td> <td>EACH OCCURRENCE</td> <td>\$2,000,000</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>DAMAGE TO RENTED PREMISES (Ea occurrence)</td> <td>\$300,000</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>MED EXP (Any one person)</td> <td>\$10,000</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>PERSONAL &amp; ADV INJURY</td> <td>\$2,000,000</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>GENERAL AGGREGATE</td> <td>\$2,000,000</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>PRODUCTS - COMPOP AGG</td> <td>\$2,000,000</td> </tr> <tr> <td>A</td> <td> <input checked="" type="checkbox"/> AUTOMOBILE LIABILITY  <input checked="" type="checkbox"/> ANY AUTO  <input type="checkbox"/> OWNED AUTOS ONLY      <input type="checkbox"/> SCHEDULED AUTOS  <input type="checkbox"/> HIRED AUTOS ONLY      <input type="checkbox"/> NON-OWNED AUTOS ONLY                 </td> <td></td> <td></td> <td>RM8CA00039191</td> <td>12/31/2019</td> <td>12/31/2020</td> <td>COMBINED SINGLE LIMIT (Ea accident)</td> <td>\$2,000,000</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>BODILY INJURY (Per person)</td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>BODILY INJURY (Per accident)</td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>PROPERTY DAMAGE (Per accident)</td> <td></td> </tr> <tr> <td>B</td> <td> <input checked="" type="checkbox"/> UMBRELLA LIAB      <input checked="" type="checkbox"/> OCCUR  <input type="checkbox"/> EXCESS LIAB      <input type="checkbox"/> CLAIMS-MADE  <input type="checkbox"/> DED      <input checked="" type="checkbox"/> RETENTION \$10,000                 </td> <td></td> <td></td> <td>US00077229LI19A</td> <td>12/31/2019</td> <td>12/31/2020</td> <td>EACH OCCURRENCE</td> <td>\$14,000,000</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>AGGREGATE</td> <td>\$14,000,000</td> </tr> <tr> <td>C</td> <td>                     WORKERS COMPENSATION AND EMPLOYERS' LIABILITY                      ANY PROPRIETOR / PARTNER / EXECUTIVE OFFICER/MEMBER EXCLUDED?                      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<b>CERTIFICATE HOLDER</b> Tradebe Environmental Services, LLC 1433 E 83rd Ave Suite 200 Merrillville IN 46410 USA			<b>CANCELLATION</b> SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS. AUTHORIZED REPRESENTATIVE 																																																																																																																																																																				



Tradebe Environmental Services, LLC.  
1433 E. 83<sup>rd</sup> Ave., Ste. 200  
Merrillville, IN 46410

AGENCY CUSTOMER ID: 570000084433

LOC #:



### ADDITIONAL REMARKS SCHEDULE

Page \_ of \_

AGENCY Aon Risk Services Central, Inc.		NAMED INSURED Tradebe Environmental Services, LLC
POLICY NUMBER See Certificate Number: 570083444145		
CARRIER See Certificate Number: 570083444145	NAIC CODE	EFFECTIVE DATE:

## ADDITIONAL REMARKS

THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM.

FORM NUMBER: ACORD 25 FORM TITLE: Certificate of Liability Insurance

INSURER(S) AFFORDING COVERAGE	NAIC #
INSURER	
INSURER	
INSURER	
INSURER	

## ADDITIONAL POLICIES

If a policy below does not include limit information, refer to the corresponding policy on the ACORD certificate form for policy limits.

[illegible]

ACORD 101 (2008/01)

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TRADEBE™

Tradebe Environmental Services, LLC.  
1433 E. 83<sup>rd</sup> Ave., Ste. 200  
Merrillville, IN 46410

AGENCY CUSTOMER ID: 570000084433

LOC #:



## ADDITIONAL REMARKS SCHEDULE

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AGENCY Aon Risk Services Central, Inc.		NAMED INSURED Tradebe Environmental Services, LLC	
POLICY NUMBER See Certificate Number: 570083444145			
CARRIER See Certificate Number: 570083444145	NAIC CODE	EFFECTIVE DATE:	

### ADDITIONAL REMARKS

THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM.

FORM NUMBER: ACORD 25 FORM TITLE: Certificate of Liability Insurance

#### Additional Named Insureds List

Tradebe Environmental Services, LLC  
Tradebe Treatment and Recycling, LLC  
Tradebe Treatment and Recycling Nashville, LLC  
Tradebe Treatment and Recycling Wisconsin, LLC  
Tradebe Treatment and Recycling Northeast, LLC  
Norlite, LLC  
Tradebe Transportation, LLC  
Tradebe Thunderbird Trucking  
Aaron Oil Company, LLC  
International Hydrocarbon Services, LLC  
Tradebe Industrial Services, LLC  
Tradebe Treatment and Recycling of Baton Rouge, LLC  
Tradebe Capital Corporation  
Tradebe Treatment and Recycling of Tennessee, LLC  
First Response, a Tradebe Company LLC  
Tradebe Treatment and Recycling of Bridgeport, LLC  
Tradebe Treatment and Recycling of Stoughton, LLC  
Tradebe Treatment and Recycling of Northborough, LLC

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**ADDITIONAL REMARKS SCHEDULE**

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AGENCY Aon Risk Services Central, Inc.		NAMED INSURED Tradebe Environmental Services, LLC	
POLICY NUMBER See Certificate Number: 570083444145			
CARRIER See Certificate Number: 570083444145	NAIC CODE	EFFECTIVE DATE:	

**ADDITIONAL REMARKS**

THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM,

FORM NUMBER: ACORD 25 FORM TITLE: Certificate of Liability Insurance

Contractor's Pollution and Professional

Policy Type: Professional Liability and Contractors Pollution Liability, Claims-Made  
Insurer Affording Coverage: Indian Harbor Insurance Company  
Policy Number: PEC004703903  
Effective Date: 12/31/2019  
Expiration Date: 12/31/2020  
Limit of Liability: \$5,000,000 aggregate

Policy Type: Site Pollution Liability - Claims-Made - States / NY, CT and MA  
Insurer Affording Coverage: Indian Harbor Insurance Company - SIR applies per the policy terms and conditions  
Policy Number: PEC004563901  
Effective Date: 12/31/2019  
Expiration Date: 12/31/2020  
Limit of Liability: \$5,000,000 aggregate

Policy Type: Site Pollution Liability - Claims-Made - States / WI, TN and IN  
Insurer Affording Coverage: Indian Harbor Insurance Company  
Policy Number: PEC004563701  
Effective Date: 12/31/2019  
Expiration Date: 12/31/2020  
Limit of Liability: \$5,000,000 aggregate

Policy Type: Site Pollution Liability - Claims-Made  
Insurer Affording Coverage: Indian Harbor Insurance Company  
Policy Number: PEC000096407  
Effective Date: 12/31/2019  
Expiration Date: 12/31/2022  
Limit of Liability: \$5,000,000 aggregate

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## H. DOT SECURITY PLAN (OUTLINE)



### DOT SECURITY PLAN ACKNOWLEDGEMENT FORM

The DOT Security Regulations (HM-232) requires any person(s) who offers for transportation or transports a hazardous material in an amount that must be placarded in accordance with Subpart F or Part 172 of the HMR or a hazardous material in bulk packaging having a capacity equal to or greater than 3,500 gallons for liquids and gases or more than 468 cubic feet for solids to develop and implement a DOT Security Plan.

By signing this form, I am acknowledging and certifying that Tradebe Transportation, LLC and its locations in Georgia, Indiana, Iowa, Kansas, Maryland, North Carolina, Pennsylvania, Ohio, South Carolina, Tennessee, Texas and Wisconsin are in compliance with the requirements of 49 CFR 172 (HM-232) regarding Security Plans and that:

- A Security Plan has been developed and implemented that adheres to the requirements set forth under the Hazardous Material Security Plan program in accordance with HM-232.
- The appropriate measures have been implemented and information has been obtained regarding driver/employee hiring, screening and review process, including but not limited to previous employer inquiries, driving record review, and criminal background checks.
- The appropriate measures have been implemented to restrict unauthorized access to hazardous materials while being prepared for transportation, loaded, or while in-transit.
- The appropriate measures have been implemented to address the security risks of shipments of hazardous materials en route from origin to destination and the drivers have been trained to recognize and react to potential security problems.
- Employees who handle and transport hazardous materials have received training that provides an awareness of the security risks associated with hazardous materials transportation and methods to enhance hazardous material transportation security.

Peter Olsen  
Printed Name

Peter Olsen  
Signature

Director of Transportation  
Title

10-18-2019  
Date

#### COMPANY:

Company Name: Tradebe Transportation, LLC  
Company Address: 4343 Kennedy Avenue  
City, State, Zip Code: East Chicago, IN 46312  
Telephone Number: (800) 388-7242

## I. EMERGENCY AND SAFETY PLANS

### **Emergency Response Plan**

Tradebe shall contain, control, and clean up any spills occurring during collection, packaging or storing to protect the public health and environment. Our Safety, Spill and Emergency Plan is presented below.

### **Safety, Spill, and Emergency Plan**

If any chemicals are spilled while Tradebe is on-site, Tradebe's Technical Field Personnel will serve as the initial emergency responders. Tradebe's field personnel are fully trained on the proper procedures for responding to small chemical spills and fires. Tradebe will keep the following information at the work site:

- Emergency Response Guidelines (Actions to be taken)
- Emergency Response Contacts and Telephone Numbers (Site Safety Plan)
- A Map to the nearest medical facility

### **Emergency Equipment**

The following equipment will be available for an emergency response situation:

#### Internal Communication and Alarm System

Telephones should be located on-site within easy access to all areas where an emergency may arise. The telephone will be used in an emergency situation to call 911 and to communicate with the appropriate outside agencies.

#### Emergency Eye Wash

Emergency eyewash will be present on-site.

#### First Aid Supplies

First aid kits will be available on-site.

#### Fire Prevention System

Fire extinguishers will be present on-site and within easy access to all areas where an emergency may arise. All fire extinguishers are inspected on a regular basis and recharged annually.

#### Spill Kit

The spill kit will contain a broom, shovel, and absorbent material.

### **Emergency Response Guidelines**

Unplanned releases fall into two categories: either an Incidental Release or an Emergency Response. Tradebe personnel will respond to incidental releases, nuisance spills, or minor releases of hazardous substances where the substance can be absorbed, neutralized, or otherwise controlled at the time of release. Incidental releases are limited in quantity, exposure potential, and toxicity and clearly do not present a significant safety or health risk to the personnel assigned to cleaning up the release.

Upon determining that the release is containable and controllable, the specified Tradebe Emergency Response Coordinator (ERC) will implement the following clean-up action plan. During clean-up procedures, all reasonable measures will be taken to ensure that the fires, explosions, and releases do not occur, recur, or spread to other



areas. A small spill includes drips and splashes that cover a small surface, area less than one square foot with estimated volumes less than one (1) pint.

A moderate spill includes splashes that cover a surface area greater than one square foot and with estimated volumes of less than one-half (1/2) gallon of material.

The following procedures will be performed by the Emergency Response Coordinator (ERC) and other trained Tradebe personnel in the event of an Incidental release.

1. Small fire
  - a. Stay upwind and out of low areas.
  - b. Eliminate ignition sources
  - c. Move the appropriate firefighting equipment to the area; extinguish the fire.
  - d. Using a shovel, transfer the spent material to a lined drum (or equivalent container) and seal the container.
  - e. Ensure that the recovered waste or contaminated material is properly stored in a container storage unit.
  - f. Decontaminate the area, equipment, and personnel.
2. Chemical Spill
  - a. Eliminate all ignition sources and secure the area.
  - b. Don the proper personal protective equipment.
  - c. Move unaffected chemicals out of the area, if no hazard is involved.
  - d. Contain the spill to prevent the spill from spreading. Use Damming Diking and/or absorbent materials to stop the spread of the spilled materials.
  - e. Absorb the spilled materials with absorbents, including Vermiculite, Ultrasorb, or spill pillows.
  - f. Using a broom and shovel, transfer the spent material to a lined drum (or equivalent container) and seal the container.
  - g. Ensure that the recovered waste or contaminated material is properly stored in a container in the storage unit.
  - h. Decontaminate the area, equipment and personnel.
3. Solvent or Oil Spills
  - a. Eliminate all ignition sources and secure the area.
  - b. Don the proper personal protective equipment.
  - c. Move unaffected chemicals out of the area, if no hazard is involved.
  - d. Contain the spill to prevent the spill from spreading. Use Damming Diking and/or absorbent materials to stop the spread of the spilled materials.
  - e. Absorb the spilled materials with absorbents, including Vermiculite, Ultrasorb, or spill pillows.
  - f. Using a broom and shovel, transfer the spent material to a lined drum (or equivalent container) and seal the container.
  - g. Ensure that the recovered waste or contaminated material is properly stored in a container in the storage unit.
  - h. Decontaminate the area, equipment and personnel.

The Emergency Action Plan shall be implemented in the event of the following situation:

1. Fire
  - a. The fire could generate the release of toxic fumes.
  - b. The fire could spread and ignite materials at other locations.
  - c. The fire could spread off-site.



- d. The use of fire suppressant materials could cause contaminated run-off.
- 2. Explosion
  - a. Imminent danger exists which could cause an explosion, resulting in extreme heat and gas generation.
  - b. Imminent danger exists which could ignite materials at other locations.
  - c. An explosion could occur which could release toxic fumes.
- 3. Unplanned Release of Hazardous Waste
  - a. The release of flammable liquids or vapors could create a potential fire or explosion hazard.
  - b. The release could contain toxic liquids and/or fumes.
  - c. The release has the potential to contaminant air, soil, or surface water.

In the event of an emergency situation requiring the implementation of the Emergency Action Plan, the Emergency Response Coordinator (ERC) assumes the lead role in responding to the emergency and will call the 911 emergency number and implement site control and evacuation, if necessary. This of course includes local police and fire department emergency response personnel.

### **Transportation Spill Guidelines**

In the event of an on-the road spill or another emergency, the driver will follow these procedures:

- A. Remain in the unit and warn all pedestrians and motorists to stay away from the spill area. Point out to them the danger involved and have someone call the police or fire department.
- B. Upon the arrival of the police or fire department, the driver will inform them of what kind of material has been spilled and request the area be blocked off to both pedestrians and vehicles to prevent property damage or any serious personal injury. The driver will request the first responder, fire, or police personnel to protect the area while the driver reports to a facility Emergency Coordinator.
- C. The Emergency Coordinator will gather the following information from the driver and relay it to the National Response Center and the appropriate State agency
  - 1. Name of person reporting the incident.
  - 2. Name, address, and identification number of the transporter.
  - 3. Phone number where person reporting can be reached.
  - 4. Date, time, and location of the incident.
  - 5. The extent of injuries, if any.
  - 6. Classification, name, and quantity of hazardous materials, wastes involved, if such information is available.
  - 7. Type of incident and nature of hazardous materials/wastes involved, if such information is available.
  - 8. For each waste product involved provide:
    - a. Name and identification number of generator.
    - b. Product shipping, hazardous class and UN or NA number.
    - c. Estimated quantity of material spilled.
    - d. If possible, the extent of contamination to land, water, or air.
  - 9. Shipping name, hazard class, and identification of any other material carried.
- D. Specific actions to be taken at the scene of the spill are:

1. **Containment** - the critical problem is to prevent the escape of any spilled liquid or solid into the ground or into a storm or sanitary sewer. A barrier must be erected immediately to prevent the escape of spilled materials/waste liquids, using whatever material is at hand, even a dirt curb, to prevent the spread of the spill. Containment of solids will be dependent on wind and weather conditions. Use the tarpaulin in the vehicle or plastic (available at most supply stores), if conditions are wet and windy. Simultaneously, the sources of the spill or leak must be located and controlled, e.g., a drum plugged or taped, turned upside down.

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

If the shipping description is known (refer to the manifest) find the name in your Emergency Response Guidebook in the blue pages and turn to the Corresponding Guide Number (orange top page – last 1/3 of the book).

If the shipping description is not known, check the placard on the vehicle for an “UN” or “NA” number, look up the number in the yellow pages and refer to the Corresponding Guide Number, or contact the generator of the waste for safety data.

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

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

#### **EMERGENCY EQUIPMENT:**

Each tractor carries the following emergency equipment stored in sturdy aluminum box:

- Gloves
- Goggles
- Slicker Suit
- Hazorb (4 pillows)
- Shovel
- Full-face Respirator
- Boots
- DOT Emergency response Guidebook
- Skin & Eye Neutralization Solution
- Emergency Reflective Triangles (3)

#### **Each Tractor Also Carries:**

- First Aid Kit
- Flares
- Ten (10)-pound ABC Fire Extinguisher

Two steps remain once the immediate emergency aspects of a spill have been taken care of:

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

Equipment will be decontaminated in the following manner:

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

**Clothing** – Contaminated clothing will be placed with the cleanup residue and disposed of per Federal and State Regulations at an authorized disposal site. If clothing is reusable, then it will be decontaminated properly and the residue added to the other waste.

**Notification** – The Department of Transportation, Director of Hazardous Materials Registration, Materials and Transportation Bureau, Washington, DC 10590 will be notified, in writing, of the occurrence and nature of the incident and a copy will be submitted to the proper Environmental Management Facility.

### Site Safety Plans

Tradebe will prepare a site-specific Safety Plan. Tradebe will ensure the on-site employees are familiar with the approved Safety Plan.

## J. SUGGESTED ALTERNATIVE LANGUAGE

### **REVISE – revise to 30 days**

p. 2 of 10 Sec. 2 Payment Terms

(a) Invoices; Payment

Unless agreed otherwise, University shall pay an invoice within forty-five days of receiving the invoice.

### **REVISE**

p. 6 of 10 Sec. 11 Indemnification

ADD: NOTWITHSTANDING ANYTHING CONTAINED IN THIS AGREEMENT, THE OBLIGATION TO INDEMNIFY SHALL NOT EXTEND TO CLAIMS FOR ANY LIQUIDATED, INDIRECT, SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES OR PENALTIES OF ANY KIND WHATSOEVER.

### **REVISE**

p. 9 of 10

Contractor shall make the records available at all reasonable times and upon prior written notice for inspection and audit by University, the Auditor of the State of Iowa or any other auditor or representative University deems appropriate

### **REVISE**

#### **APPENDIX A AMES LABORATORY TERMS AND CONDITIONS**

p. 55 of 88 **58. INDEMNIFICATION (ISU APR 2009)** and p. 76 of 88 Sec. 34 **INDEMNIFICATION (ISU APR 2009)** and p. 78 OF 88 **WORK BY CONTRACTORS AT AMES LABORATORY – SUPPLEMENTAL CONDITIONS**

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**(March 2012) 2. INDEMNITY, ADD:** NOTWITHSTANDING ANYTHING CONTAINED IN THIS AGREEMENT, THE OBLIGATION TO INDEMNIFY SHALL NOT EXTEND TO CLAIMS FOR ANY LIQUIDATED, INDIRECT, SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES OR PENALTIES OF ANY KIND WHATSOEVER