NM - 63

GENERAL CORRESPONDENCE

YEAR(S):

1990-1991

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

September 9, 1992

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

CERTIFIED MAIL
RETURN RECEIPT NO. P-670-683-666

Mr. Lawrence N. Hicks, Vice President
ConTeck Environmental Services, Inc.
22460 Highway 169
Elk River, Minnesota 55330

1000374

RE: MOBILE THERMAL REMEDIATION FACILITY
OCD RULE 711 PERMIT APPLICATION

Dear Mr. Hicks:

The Oil Conservation Division (OCD) has received your July 7, 1992, application for a surface waste disposal facility in accordance with OCD Rule 711. The application proposes to operate a mobile thermal remediation facility for the reclamation of hydrocarbon contaminated wastes generated in conjunction with the production of oil and gas. The OCD has evaluated the need for a Rule 711 permit for this facility.

At this time the OCD does not require a Rule 711 permit for a mobile thermal treatment facility. The individual company or lease operator who wishes to dispose of waste at their lease site using your portable disposal unit must obtain prior authorization from the OCD Santa Fe Office. If wastes are moved off site from a number of leases to a centralized location to be disposed of using your thermal disposal unit then an OCD Rule 711 permit is required prior to operation of this facility.

If you have any additional questions, please do not hesitate to contact me at (505) 827-5812.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

RCA/kmb

xc: Mike Williams - Artesia District Office
Chris Eustice - Hobbs District Office
Denny Foust - Aztec District Office

OIL CONSERVATION DIVISION
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CRI

CONTROLLED RECOVERY INC.

P.O. BOX 369, HOBBS, NM 88241 (505) 393-1079

August 18, 1992

Director
Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87504-2088

RE: ConTeck Environmental Services, Inc. application for a thermal remediation plant

Dears Sirs:

Will this application require any permits from other regulatory bodies such as Air Quality or will your approval, if given, be all inclusive?

Sincerely,

Ken Marsh
President

Affidavit of Publication

STATE OF NEW MEXICO)
) ss.
COUNTY OF LEA)

Joyce Clemens being first duly sworn on oath deposes and says that he is Adv. Director of THE LOVINGTON DAILY LEADER, a daily newspaper of general paid circulation published in the English language at Lovington, Lea County, New Mexico; that said newspaper has been so published in such county continuously and uninterruptedly for a period in excess of Twenty-six (26) consecutive weeks next prior to the first publication of the notice hereto attached as hereinafter shown; and that said newspaper is in all things duly qualified to publish legal notices within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico.

That the notice which is hereto attached, entitled

Notice Of Publication

and numbered ..... in the ..... Court of Lea County, New Mexico, was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, once each week on the same day of the week, for one (1) day consecutive weeks, beginning with the issue of August 7, 1992 and ending with the issue of August 7, 1992.

And that the cost of publishing said notice is the sum of $36.18 which sum has been (Paid) (Assessed) as Court Costs

Joyce Clemens

Subscribed and sworn to before me this 14th day of August, 1992

Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28, 1994

LEGAL NOTICE
NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Oil Conservation Commission Regulations, the following applications to construct and operate a commercial surface waste disposal facility have been submitted for approval to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

Envirotech Inc., Morris D. Young, President, 5796 U.S. Highway 64-3014, Farmington, New Mexico 87401, has submitted an application to construct and operate a commercial landfarm facility for remediation of hydrocarbon contaminated soils. The proposed facility is in the NW/4, Section 6, Township 26 North, Range 10 West, NMPM, San Juan County, New Mexico. The facility is proposed to consist of a 100 acre land management area where solids containing "non-hazardous" contaminants will be spread on the ground surface in six inch lifts or less and periodically stirred to enhance biodegradation of contaminants. No liquids will be allowed to be accepted for disposal at the landfarm. The ground water most likely to be affected by any accidental discharges is at a depth in excess of 700 feet and has an estimated total dissolved solids content of approximately 900 mg/l. The permit application addresses the construction, operations, spill/leak prevention and monitoring procedures to be utilized at the site.

ConTeck Environmental Services, Inc., Lawrence N. Hicks, Vice President, 22460 Highway 169, Elk River, Minnesota, 55330, has submitted an application to construct and operate a mobile thermal remediation plant for the reclamation of wastes generated in conjunction with the production of oil and gas. The portable treatment unit is a small rotary kiln operation mounted on two semi-trailers and is designed to thermally process petroleum wastes and contaminated soils. The ground water most likely to be affected by any accidental discharges is variable and site specific since this is a portable operation. The OCD will require all operations to be self-contained to prevent any contaminants from reaching the ground surface. The permit application addresses the construction, operations, spill/leak prevention and monitoring procedures to be utilized during operations.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 28th day of July, 1992.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY,
Director

SEAL

Published in the Lovington Daily Leader August 7, 1992.

Affidavit of Publication

No. 14035

STATE OF NEW MEXICO,

County of Eddy:

Gary D. Scott being duly sworn, says: That he is the Publisher of The Artesia Daily Press, a daily newspaper of general circulation, published in English at Artesia, said county and state, and that the hereto attached Legal Notice

was published in a regular and entire issue of the said Artesia Daily Press, a daily newspaper duly qualified for that purpose within the meaning of Chapter 167 of the 1937 Session Laws of the state of New Mexico for 1 consecutive days weeks on the same day as follows:

First Publication August 6, 1992

Second Publication

Third Publication

Fourth Publication

Gary D. Scott

Subscribed and sworn to before me this 11th day of August 1992

Barbara Ann Baars

Notary Public, Eddy County, New Mexico

My Commission expires September 23, 1996

Copy of Publication

LEGAL NOTICE

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

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ConTeck Environmental Services, Inc., Lawrence N. Hicks, Vice President, 22460 Highway 169, Elk River, Minnesota, 55330, has submitted an application to construct and operate a mobile thermal remediation plant for the reclamation of wastes generated in conjunction with the production of oil and gas. The portable treatment unit is a small rotary kiln operation mounted on two semi-trailers and is designed to thermally process petroleum wastes and contaminated soils. The ground water most likely to be affected by any accidental discharges is variable and site specific since this is a portable operation. The OCD will require all operations to be self-contained to prevent any contaminants from reaching the ground surface. The permit application addresses the construction, operations, spill/leak prevention and monitoring procedures to be utilized during operations.

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If no public hearing is he the Director will approve disapprove the proposed pl based on information ava able. If a public hearing held, the director will appro or disapprove the propos plan based on information the plan and information su mitted at the hearing.

GIVEN under the Seal of N Mexico Oil Conservation Co mission at Santa Fe, New M ico, on this 28th day of Ju 1992.

STATE OF NEW MEXIC
OIL CONSERVATIC
DIVISI
S/ William J. LeM
WILLIAM J. LEMA
Direc

SEAL

Published in the Artesia Da Press, Artesia, N.M. August 1992.

Legal 140

OIL CONSERVATION DIVISION
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STATE OF NEW MEXICO
County of Bernalillo ss

Thomas J. Smithson being duly sworn declares and says that he is National Advertising manager of the **Albuquerque Journal** , and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chaper 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, a copy of which is hereto attached, was published in said paper in the regular daily edition,

for 1 times, the first publication being on the 7 day of Aug., 1992, and the subsequent consecutive publications on ....., 1992.

Thomas J. Smithson

OFFICIAL SEAL
Bernadette Ortiz
BERNADETTE ORTIZ
NOTARY PUBLIC-NEW MEXICO
NOTARY BOND FILED WITH SECRETARY OF STATE
My Commission Expires 12-18-93

Sworn and subscribed to before me, a Notary Public in and for the County of Bernalillo and State of New Mexico, this 7 day of Aug., 1992.

PRICE $ 32.28

Statement to come at end of month.

CLA-22-A (R-12/92) ACCOUNT NUMBER C80930

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 28th day of July, 1992.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY, Director

NOTICE OF PUBLICATION

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ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 28th day of July, 1992.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

William J. LeMay by

S E A L

WILLIAM J. LEMAY, Director

ConTeck
ENVIRONMENTAL SERVICES, INC.

DIVISION
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July 7, 1992

Mr. Roger C. Anderson
Environmental Engineer
State of New Mexico
Oil Conservation Division
Land Office Building
P.O. Box 2088
Santa Fe, NM 87504-2088

Re: Introduction to ConTeck Environmental Services, Inc.
Application for Surface Waste Disposal Facility
Thermal Treatment of Petroleum Contaminated Soils

Dear Mr. Anderson:

On behalf of ConTeck Environmental Services, Inc. (CT), we would like to thank you for meeting with us on June 28, 1992. At this time, we are submitting an Application for a Surface Waste Disposal Facility to operate a mobile thermal soil remediation unit on petroleum industry wastes within the State of New Mexico.

We currently maintain air emission Permit No. 930 issued by the Bureau of Air Quality, State of New Mexico, Environment Department. Within the last month we have also been issued two air permits within Bernalillo County to operate the plant on hydrocarbon contaminated soil sites. Two stack tests have been successfully completed with the plant. Our New Mexico air permit will allow us to operate within major portions of the State. However, where additional local permits are required we will obtain those before initiating a project.

This submittal contains the completed application forms; and technical support information for the plant, including, stack test results, photographs, and various other miscellaneous plant information in the attached Statement of Qualifications. We have also attached a copy of our State of New Mexico and Bernalillo County permits.

We operate a mobile thermal remediation plant which is available for completing on-site thermal remediation projects. No hazardous waste will be processed within the plant.

Our plant construction was completed in 1990 and operated during the past two years. We have permits issued or pending in many States to operate the plant to thermally process petroleum wastes and contaminated soils. Our process is particularly amenable to soil decontamination from pipeline ruptures; spills; above and below ground storage tank removal areas; lagoon clean-up's; railroad and airport fuel depots and other petroleum waste applications.

The plant basically is a small rotary kiln operation mounted on two semi-trailers. The plant recently underwent very rigid stack testing per EPA methods and successfully passed by exceeding 99.99% efficiency for both particulate and volatile compound emissions. Emissions equipment includes a six-unit multicyclone, a baghouse and afterburner equipment. The plant is versatile and we can change temperatures and throughput capacity to handle a wide variety of contaminated materials.

A mineral soil matrix normally is required to operate our facility. Generally, petroleum contaminated soil is fed into the plant at rates of 10 to 65 tons per hour. The soil in the rotary kiln is heated as high as 1200 degrees Fahrenheit or to the vaporization point of the contaminant at which point it is desorbed from the soil surface and transferred to the hot process gases. The saturated process gases are processed through a six unit multicyclone and baghouse to remove particulates; and a afterburner unit which ignites the combustible hydrocarbons in the process air stream. The exit stack emissions will meet all State requirements. The treated output soil will be sampled regularly and will be adequately decontaminated to recycle the material as backfill. No wastewater or regulated process wastes are generated during operation of the facility.

Our plant can be mobilized to any site area and needs less than one-half acre to operate. The plant and operation is self contained and we haul in liquid propane, natural gas or fuel oil and limited quantities of process water. The plant has state-of-practice monitoring devices for air sampling

and process soil sampling. CT's plant will meet the particulate and hydrocarbon emission limits for all States.

During the interim, should additional comments or questions arise, please feel free to contact our office.

Very truly yours,
ConTeck Environmental Services, Inc.

Lawrence N. Hicks

Lawrence N. Hicks,
Vice President

John R Cannon

Val Carver

John R. Cannon, P.E.
Environmental Engineer

Val Carver,
Chemical Engineer

encls. Application Forms
Supplemental Information
Statement of Qualifications
State of New Mexico Permit No. 930
Bernalillo County Permit Nos. 293 and 294

SUPPLEMENTAL INFORMATION
APPLICATION FOR WASTE STORAGE/DISPOSAL FACILITY
CONTECK ENVIRONMENTAL SERVICES, INC.
JULY 7, 1992

I. Type of Operation:

CT operates a mobile thermal volatilization processing plant. The plant uses a rotary kiln to heat petroleum contaminated soil to volatilize compounds from the soil matrix. The process air stream is processed through a multi-unit cyclone; baghouse and afterburner to remove particulates and ignitable process gases.

II. Operator:

CT is the owner/operator of the plant. See Attached application.

III. Location of Disposal Pit:

CT will mobilize the plant to contaminated sites.

IV, Expansion Request: N/A

V. Land Ownership: N/A

VI. Storage/Disposal Facilities Description:

A. The plant can process petroleum contaminated solids and soils, tank bottoms, lagoon sludges, and drilling muds. Each waste would have to be evaluated on a case by case basis. Regulatory Agency approvals would be obtained before materials would be processed. Mineral soil is the normal transport media for processing. Soil including clay, silt and sand can be processed. All material less than three inches in diameter can be run through the facility.

B. N/A

VII. Engineering Design:

A. Technical Data

1. N/A

2. No on-site disposal pits would be developed. Some excavated soil piles would be covered with plastic to control dust blowing or water erosion. Treated soil would be placed back into excavation pit or stockpiled as clean fill. Organic matter in soil would be oxidized during the process. Soil moisture would be significantly reduced during the processing. Output soil is rewetted with a quench auger system before exiting the kiln.

3. N/A

B. General Construction Requirements: N/A

VIII. Spill/Leak Prevention and Reporting Procedures: N/A

IX. Operation and Maintenance:

A. N/A
B. N/A
C. N/A
D. N/A
E. N/A

F. No hazardous waste will be accepted for processing at the facility. All waste is presampled by the owner and Agency approved before accepting the material for processing.

G. CT will maintain all records for at least a two year period.

H. CT will control access and egress to the facility. No unauthorized wastes will be accepted at the facility.

X. Closure Plan:

A. A Closure Plan in most cases would be prepared by the owner or engineering representative. This plan would detail excavation grades, backfilling, clean-up standards, limits of excavation, would be outlined in the closure documents.

B. CT will notify OCD of arrivals and departures from sites.

XI. Site Characteristics - Fresh Water Protection:

A. N/A
B. N/A

XII. Proof of Notice; N/A

XIII. Hydrogen Sulfide Contingency Plan: N/A

XIV. Additional Information: See Attachments

XV. Certification: See Application

Revised 5/92

State of New Mexico
Energy, Minerals and Natural Resources Department
OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, NM 87501

APPLICATION FOR SURFACE WASTE DISPOSAL FACILITY

(Refer to OCD Guidelines for assistance in completing the application)

☐ Commercial ☐ Centralized

I. Type: ☐ Produced Water ☐ Drilling Muds ☑ Other Mobile
☐ Solids ☐ Treating Fluids

II. OPERATOR: ConTeck Environmental, Inc.
ADDRESS: 22460 Hwy. 169 NW, Elk River, MN 55330
CONTACT PERSON: Lawrence Hicks PHONE: (612) 441-4965

III. LOCATION: _____/4 _____/4 Section _____ Township _____ Range _____
Submit large scale topographic map showing exact location.

IV. IS THIS AN EXPANSION OF AN EXISTING FACILITY? ☐ Yes ☑ No

V. Attach the name and address of the landowner of the disposal facility site and landowners of record within one-half mile o the site.

VI. Attach discription of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.

VII. Attach detailed engineering designs with diagrams prepared in accordance with Division guidelines for the construction/installation of the following: pits or ponds, leak-detection systems, aerations sytems, enhanced evaporation (spray) systems, waste treating systems, and security systems.

VIII. Attach a contingency plan for reporting and clean-up of spills or releases.

IX. Attach a routine inspection and maintenance plan to ensure permit compliance.

X. Attach a closure plan.

XI. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact fresh water. Depth to and quantity of ground water must be included.

XII. Attach proof that the notice requirements of OCD Rule 711 have been met (Commercial facilities only).

XIII. Attach a contingency plan in the event of a release of H_2S.

XIV. Attach such other information as necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

XV. CERTIFICATION

I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Lawrence N. Hicks Title: Vice President

Signature: Lawrence N. Hicks Date: 7/7/92

DISTRIBUTION: Original and one copy to Santa Fe with one copy to appropriate Division District Office.

BRUCE KING
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
AIR QUALITY BUREAU
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-0090

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

December 30, 1991

CERTIFIED MAIL NO. P 670 570 992
RETURN RECEIPT REQUESTED

Mr. Jim Oberg
DERT, Inc.
Rural Route 2, Box 71
Colton, SD 57018

Air Quality Permit No. 930

Dear Mr. Oberg:

Air Quality Permit No. 930 is issued by the Air Quality Bureau of the New Mexico Environment Department ("Department") to DERT, Inc. pursuant to the Air Quality Control Act ("Act") and regulations adopted pursuant to the Act including Air Quality Control Regulation 702, Permits (AQCR 702) and is enforceable pursuant to the Act and the air quality control regulations applicable to this source. This permit authorizes DERT, Inc. to operate a 70 ton per hour portable drum mix asphalt plant that has been modified as a portable thermal desorption unit for the remediation of hydrocarbon contaminated soils in New Mexico.

Federal new source performance standards (NSPS) do not apply to this facility. No national emission standards for hazardous air pollutants (NESHAP) apply to this facility. However, during any asbestos demolition or renovation work 40 CFR 61, Subpart M (NESHAP) would apply.

The plant shall be operated in accordance with the permit application dated February 11, 1991, received by the Bureau on February 12, 1991. The Department has reviewed the permit application for the proposed portable plant and performed air quality modeling as part of the permit review. Based on the control measures described in your application and the conditions of this permit, the Department has determined that the provisions of the Act and ambient air quality standards will be met. Conditions have been imposed in this permit in order to assure continued compliance. AQCR 702, Part Two K.1 states that any term or condition imposed by the Department on a permit or permit revision is enforceable to the same extent as a regulation of the New Mexico Environmental Improvement Board. Pursuant to AQCR 702 the facility is subject to the following conditions:

DRUG FREE

CONDITIONS

1. Operation

The production rate shall not exceed 70 tons per hour.

The thermal desorption unit shall be equipped and operated with a cyclone, baghouse, and afterburner. The afterburner shall be operated at not less than 1,400 °F.

This facility is specifically forbidden to process materials contaminated with halogenated hydrocarbons. This permit does not authorize processing of materials classified as hazardous waste.

The facility is authorized to operate 8 hours per day between the hours of 9 a.m. and 5 p.m., 5 days per week, 4 weeks per month, 8 months per year.

Condition 1 has been placed in the permit in accordance with AQCR 702 Part Two K.1 which provides that the contents of the application specifically identified shall become terms and conditions of the permit and AQCR 702 Part Three - Permits for Toxic Air Pollutants. The 70 ton per hour production rate specified in the permit application was the basis for the Department's modeling analysis to determine compliance with the applicable ambient air quality standards.

Compliance with condition 1 will be determined through verification that the equipment specified in the permit application is installed and operated in accordance with both the application and the terms and conditions of this permit.

2. Emission Limits

Emissions to the atmosphere shall not contain particulate matter in excess of 1.93 pounds per hour (1.2 tons per year) and the stack shall not exhibit 20% opacity or greater.

Fugitive particulate emissions from process equipment shall be controlled by a fugitive dust control system that shall be operated and maintained so that all particulate emissions are limited to the stack outlet.

Emissions to the atmosphere shall not contain volatile organic compounds in excess of 0.25 pounds per hour, (0.16 tons per year).

Condition 2 has been placed in the permit in accordance with AQCR 702 Part Two K.1, K.2, and K.3.d. These are the emission rates applied for and evaluated as the basis of the Department's review.

Compliance with condition 2 will be determined by Department inspections of the facility and by compliance with the emission limits and opacity readings conducted in accordance with the test methods specified in condition 12 - Performance Tests and Compliance Test Methods.

3. Control Equipment Malfunctions

In the event that any control equipment malfunctions, as determined by an increase of particulate emissions or opacity or an increase in VOC emissions, the plant shall cease operation until the affected equipment is repaired or replaced.

Condition 3 has been placed in the permit in accordance with AQCR 702 Part Two K.2.d to ensure that ambient air quality standards are not violated during control equipment failure or malfunction.

Compliance with condition 3 will be determined by Department inspections of the facility and by compliance with the emission and opacity limits specified in condition 2 - Emission Limits.

4. Monitor Requirements

The inlet and exit static pressure of the baghouse or differential pressure, and the cyclone operating pressure shall be monitored by the use of pressure gauges, which shall be maintained in good operating condition. Inlet and exit temperatures of the baghouse shall be monitored by the use of temperature gauges. Unit #2, the Hauck afterburner, shall be operated with a temperature gauge and a chart recorder. The temperature sensors and chart recorder shall be maintained in good operating condition.

Condition 4 has been placed in the permit in accordance with AQCR 702, Part Two K. Pressure and temperature gauges on the inlet and exit of the cyclone and baghouse will allow plant and Department personnel to check on their performance. Pressure and temperature drop are good indications of the operational efficiency of the cyclone and baghouse. The temperature gauge and chart recorder on the afterburner will allow plant and Department personnel to monitor its performance.

Compliance with condition 4 will be determined by Department

inspections of the facility and by the proper functioning of the equipment, gauges and recorder specified in this permit condition.

5. Revisions and Modifications

Any future physical changes or changes in the method of operation may constitute a modification as defined by AQCR 702, Permits, and shall be preceded by the submittal of a permit application for review by the Department. No modification shall begin prior to issuance of a permit.

Revisions to this permit shall be processed in accordance with AQCR 702 Part Two C.

Condition 5 has been placed in the permit in accordance with AQCR 702 Part Two A.1.a.(i), A.4 and K.2.d to enable the Department to review proposed changes to the facility which may constitute a permit modification prior to such changes.

Compliance with condition 5 will be determined by Department inspections and the submission of required application for permit modifications or revisions.

6. Plant Relocation

The Department shall be notified in writing fifteen (15) days prior to any relocation of the plant and shall be provided with a description of the new location including a plot plan showing the plant in respect to the property boundaries and all other particulate emitting facilities within one (1) mile from the proposed plant boundary. The relocation notice shall include the permit number, the estimated date of startup, and the estimated time at that location. If other particulate emitting facilities are located within 500 yards from the proposed plant, then the plant cannot be located or operated until the Department reviews the new site and provides written authorization to the company. The Department may require air dispersion modeling from the operator as a part of this review if crushers are located nearby or if other circumstances warrant such. The Department will promptly notify the operator if modelling is required. When this plant leaves New Mexico, the Department shall be notified in accordance with this condition. If the plant is going to return to New Mexico, the Department shall be notified in accordance with this condition.

Condition 6 has been placed in the permit in accordance with AQCR 702 Part Two A.5. This regulation requires relocation protocols to ensure that the ambient air quality standards will continue to be

met at the new location, to allow the Department to track the movements of the operation, and to ensure the continued compliance with the requirements of this permit.

Compliance with condition 6 will be determined by the company's timely notifications and submission of the information required by this permit condition to the Department.

7. Restriction on Location

This plant is not authorized to be located within 500 yards of another crushing operation, a private residence or a school. Location and operation in a manner other than approved in this permit will require the review and approval of a modified permit prior to such location and operation. The Department may require air dispersion modeling to show compliance with air quality standards if warranted. The operator will be promptly notified of such, if necessary.

Condition 7 has been placed in the permit in accordance with AQCR 702 Part Two A.5, I.4.a and K.2.d because the facility and the protocol for relocation was reviewed in terms of maintaining ambient standards in non-inhabited locations and in the absence of adjacent crushing operations. Adjacent crushing operations can cause ambient air quality standards to be exceeded near their operations. This restriction ensures attainment of ambient air quality standards per modeling performed by the Department.

Compliance with condition 7 will be determined by the results of Department inspections of the facility and by the company's timely relocation notifications to the Department.

8. Posting of the Permit

A copy of this permit shall be posted and in view at the plant site at all times and shall be made available to Department personnel for inspection upon request.

Condition 8 has been placed in the permit in accordance with AQCR 702 Part Two K.2.d to allow Department personnel to identify the equipment that constitutes the plant and to identify the permit conditions that apply to the facility.

Compliance with condition 8 will be determined by Department inspections of the facility and verification that a copy of the permit has been posted.

9. Recordkeeping and Reporting

Daily operating log and records of the following operating parameters and information recorded during all hours the thermal desorption unit is operating shall be kept.

a) Pressures at the inlet and exit of the cyclone and at the baghouse shall be recorded twice each day.

b) Hours of operation shall be recorded. Intermittent operation shall be noted by recording time operations ceased and time of subsequent startup.

c) Unit #2, the Hauck afterburner, shall be operated with a temperature gauge and a chart recorder.

d) All records shall be maintained on-site for a minimum of two years from the time of recording.

Condition 9 has been placed in the permit in accordance with AQCR 702 Part Two K.2 and K.5 to allow the Department to determine compliance with the terms and conditions of the permit.

Compliance with condition 9 will be determined by Department inspections of the facility and verification that the required records have been kept.

10. Right to Access Property and Review Records

The Department shall be given the right to enter the facility at all reasonable times to verify the terms and conditions of this permit. The company, upon either a verbal or written request from an authorized representative of the Department, shall produce any records or information necessary to establish that the terms and conditions of this permit are being met, including submission of reports to the Department according to time frames specified by the Department.

Condition 10 has been placed in the permit in accordance with AQCR 702 Part Two K.2 and K.5 to allow the Department to determine compliance with the terms and conditions of the permit.

Compliance with condition 10 will be determined by the results of Department inspections of the facility; production of records and information required to be maintained; and non-restricted entry to the property by Department personnel.

11. Notification to Subsequent Owners

The permit and conditions apply in the event of any change in control or ownership of the facility. No permit modification is required in such case. However, in the event of any such change in control or ownership, the permittee shall notify the succeeding owner of the permit and the conditions. The permittee shall also notify the Air Quality Bureau within fifteen days of the change in control or ownership.

Condition 11 has been placed in the permit in accordance with AQCR 702 Part One 19.(1) and Part Two K.2.d and M.3 to ensure that new owners are aware of the permit and its conditions.

Compliance with condition 11 will be determined upon the permittee's notification of the permit and its conditions to any succeeding owner and notification of the change in ownership to the Department.

12. Performance Tests and Compliance Test Methods

Initial performance tests are required for particulate matter, opacity, and volatile organic compounds. Compliance tests may be reimposed if Department inspections indicate possible noncompliance as evidenced by increased opacity levels measured during subsequent compliance tests or if the test was technically unsatisfactory.

The test methods used to determine any subsequent compliance shall be conducted in accordance with Methods 1 through 5, 9, and 25 (A-B) contained in the Code of Federal Regulations, Title 40, Part 60, Appendix A.

The Department shall be notified of the date and time of such testing so that the Department may have an opportunity to have an observer present during testing. The permittee shall arrange a pretest meeting with the Department thirty (30) days prior to the anticipated test date and shall observe the following pretesting and testing procedures:

a) Any variation in the sampling and analytical procedure or plant operating conditions shall be presented to the Department for approval at least thirty (30) days prior to the anticipated test date.

b) The permittee shall provide (1) sampling ports adequate for the test methods applicable to such facility, (2) safe sampling platforms, (3) safe access to sampling platforms, and (4) utilities for sampling and testing equipment.

Three inch diameter ports shall be located on the afterburner stack in accordance with the provisions of Method 1 of the Code of Federal Regulations, Title 40, Part 60, Appendix A. The stack shall be of sufficient height and diameter so that a representative test of the emissions can be performed in accordance with Method 1.

c) Where necessary to prevent cyclonic flow in the stack, flow straighteners shall be installed in accordance with CFR 40 Part 60, Appendix A, Method 1.

d) During performance tests, the baghouse pressure drop, the inlet and exit baghouse temperatures, the afterburner temperature and the plant's hourly production rate shall be monitored and recorded. This information shall be included with the test report that is required to be furnished to the Bureau. DERT, Inc. shall conduct the test at the maximum production rate at which the plant will be operated to demonstrate compliance with the permitted emission limits. Stack opacity shall be determined during the performance tests and furnished to the Bureau for use as a baseline data set during future performance inspections as a comparison of plant performance versus opacity.

e) The compliance test reports shall be submitted to the Department within thirty (30) days after the completion of testing.

Condition 12 has been place in the permit in accordance with AQCR 702, Part Two N.

Compliance with condition 12 will be determined by the satisfactory completion of the performance tests, the timely submittal of the test report to the Department, and on meeting the emission limits specified in this permit.

ADDITIONAL REQUIREMENTS

Air Quality Control Regulation No. 702, Part Two L, Permit Cancellations, requires that:

1. the Department shall automatically cancel any permit for any source which ceases operation for five (5) years or more, or permanently. Reactivation of any source after the five (5) year period shall require a new permit.

2. the Department may cancel a permit if the construction or modification is not commenced within two (2) years from

the date of issuance or, if during the construction or modification, work is suspended for a total of one (1) year.

Air Quality Control Regulation No. 702, Part Two M, Permittee's Notification Requirements to Division, requires that any owner or operator subject to this regulation shall notify the Department in writing of or provide the Department with:

a) the anticipated date of initial startup of the source not less than thirty (30) days prior to the date;

b) the actual date of initial startup of the source within fifteen (15) days after the startup date;

c) any change of operators within fifteen (15) days of such change;

d) any necessary update or correction no more than sixty (60) days after the operator knows or should have known of the condition necessitating the update or correction of the permit.

Air Quality Control Regulation 703.1 contains requirements related to Notice of Intent and Emission Inventory. Please refer to that regulation for details.

Performance test results, application for permit revisions and modifications, relocation notices, and items listed under ADDITIONAL REQUIREMENTS shall be submitted to:

Program Manager, Technical Analysis and Permit Section
New Mexico Environment Department
Air Quality Bureau
1190 St. Francis Dr., Runnels Bldg.
P.O. Box 26110
Santa Fe, New Mexico 87502

Performance test results and excess emission reports shall be submitted to:

Program Manager, Surveillance and Enforcement Section
New Mexico Environment Department
Air Quality Bureau
1190 St. Francis Dr., Runnels Bldg.
P.O. Box 26110
Santa Fe, New Mexico 87502

NOTE: Two copies of the performance test results are to be sent to the Bureau, one to the Technical Analysis and Permit Section and one to the Surveillance and Enforcement Section.

APPEAL PROCEDURES

AQCR 702, Part Two H, Permit Decisions and Appeals, paragraph 5, provides that if the applicant is dissatisfied with the action taken by the Department, a hearing may be requested before the Environmental Improvement Board. The request must be made in writing to the Secretary of the New Mexico Environment Department within thirty (30) days after notice of the Department's action has been received by the applicant. Unless a timely request for a hearing is made, the decision of the Department shall be final. Requests for a hearing shall be sent to:

Secretary, New Mexico Environment Department
1190 St. Francis Dr., Runnels Bldg.
P.O. Box 26110
Santa Fe, New Mexico 87502

If you have any questions regarding this permit please contact Jim Shively or David Baker in Santa Fe at (505) 827-0070.

Sincerely,

Gian Bacigalupa for

Cecilia Williams
Bureau Chief
Air Quality Bureau

CW/JS/DB

xc: Gian Bacigalupa, Program Manager, Surveillance & Enforcement Section, Air Quality Bureau
Don Boyes, CERL, Inc., Santa Fe

City of Albuquerque
P.O. BOX 1293 ALBUQUERQUE, NEW MEXICO 87103

June 3, 1992
CERTIFIED MAIL #P 868 407 718

Mr. Lawrence N. Hicks
Vice President
ConTeck Environmental Services, Inc.
22460 Highway 169 Northwest
Elk River MN 55330

Dear Mr. Hicks:

Re: **PERMIT - #293 SOIL RECLAMATION UNIT**

This letter constitutes a permit to ConTeck Environmental Services Inc. pursuant to Section 74-2-7 NMSA 1978 and Albuquerque/Bernalillo County Air Quality Control Regulation (AQCR) 20, *Authority-to-Construct Permits;* to errect and operate a thermal soil reclamation unit at 3200 Broadway Blvd. S.E. in accordance with the application dated March 27, 1992, further modified April 1, 1992, April 28, 1992 and May 1, 1992.

The Division has performed an analysis to verify the emissions from the facility and dispersion modeling to determine the impact on the ambient air. Based on this analysis and the control measures described in your application, the Division has determined that the provisions of the Air Quality Control Act, the Albuquerque/ Bernalillo County Air Quality Control Regulations and Federal, State and Local regulations and ambient air quality standards will be met. However, in order to assure this, the following conditions have been placed on the permit.

1. Total emissions from all stationary sources of the plant shall not exceed 2 pounds per hour of particulate matter, 43 pounds per hour of NO_x, 7 pounds per hour of carbon monoxide, 1 pound per hour of non-methane hydrocarbons and 1 pound per hour of sulfur dioxide.

2. The opacity of emissions from the stack shall be less than 20%.

3. All roadways, loading and unloading areas and other areas used by vehicles within or associated with the plant, shall be watered and/or cleaned to prevent fugitive emissions.

Section 74-2-7 "J" NMSA 1978, states that the issuance of a permit does not relieve any person from the responsibility of complying with the provisions of the Air Quality Control Act and any applicable regulations of the board. Any conditions placed upon a permit by the Department shall be enforceable to the same extent as a regulation of the Board.

Section 76-2-7 "K" NMSA 1978, provides that if the Division issues a permit with conditions, and if the applicant is dissatisfied with the action taken by the Division, the applicant may request a hearing before the Albuquerque/Bernalillo County Air Quality Control Board. The request must be made in writing to the Director of the Environmental Health Department within thirty days after the receipt of the permit.

Additionally, there are other requirements that should be noted. Air Quality Control Regulations (AQCR) 8.01 and 8.02 (B) ,*Airborne Particulate Matter*, are applicable to your facility. Air Quality Control Regulations (AQCR) 9.04, and 9.06, *Process Equipment*, are applicable to your facility. Air Quality Control Regulation (AQCR) 20 requires the following:

AQCR 20.09 provides that the Division may cancel this permit if the construction is not commenced within one year from the date of issuance, or if during the construction work is suspended for a total of one year.

AQCR 20.10 requires the permitted source to notify the Division in writing of:

A. The anticipated date of the initial start-up of a source not less than thirty days prior to the projected date;

B. actual date of initial start-up of a source within fifteen days after the start-up date;

C. change of owner or operator within fifteen (15) days of any such change, if any and,

D. an updated emissions inventory for the source together with descriptions of any reconfigurations of process technology and air pollution control equipment, every two years from the date of issuance of this permit. A letter indicating that no such change has occurred, if such is the case, shall be sufficient to comply with this requirement.

AQCR 20.11 requires a performance test conducted within sixty days after achieving maximum production, but not later than 180 days after initial start-up. The department shall be notified at least two weeks prior to the test so that our observer can be present during the test. The performance test for visible emissions readings from the baghouse stack, is required in accordance with the procedures in the Code of Federal regulation, *Title 40, Part 60, Appendix A, Method 9*. The Department will provide a certified reader if desired by the permittee.

The permit and conditions apply in the event of any change in control or ownership of the facility. In the event of any such change in control or ownership, the permittee should notify the succeeding owner of the permit and conditions.

Thank you very much for your cooperation with the Division. If you have any questions, please feel free to call me at 768-2595.

Approved and issued this 3rd day of June, 1992.

Sincerely,

George L Dingman

George L. Dingman
Environmental Health Specialist II
Air Pollution Control Division

GLD/gld

cc: File
Permit file
Reading file

City of Albuquerque
P.O. BOX 1293 ALBUQUERQUE, NEW MEXICO 87103

June 3, 1992
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The Division has performed an analysis to verify the emissions from the facility and dispersion modeling to determine the impact on the ambient air. Based on this analysis and the control measures described in your application, the Division has determined that the provisions of the Air Quality Control Act, the Albuquerque/ Bernalillo County Air Quality Control Regulations and Federal, State and Local regulations and ambient air quality standards will be met. However, in order to assure this, the following conditions have been placed on the permit.

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Sincerely,

George L. Dingman

George L. Dingman
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Air Pollution Control Division

GLD/gld

cc: File
Permit file
Reading file

ConTeck

Environmental Services, Inc.

Low Temperature Volatilization
Facility

"The 99% Plus Efficiency Solution."

Prepared: April, 1992

Statement of Qualifications

TABLE OF CONTENTS

APPENDICES

ConTeck's Mission Statement

ConTeck Environmental Services, Inc. (CT) was founded specifically to service the need for competent, cost effective and responsive contractors in the environmental construction industry. CT recognizes that practicing in this industry is riskier than civil construction. However, with prudent construction techniques, highly trained personnel, strong project and client management, these risks can be substantially minimized for the staff and clients involved. Cost effective, quality work and safety are the keys to success for ConTeck.

CT is committed to service the needs of our clients. We recognize the need to continuously maintain the highest standards to assure the safety of our personnel and clients. Furthermore, our diverse background and knowledge of the industry's special needs allows us to provide cost effective quality work for our clients.

ConTeck Background and Qualifications

CT's principals have extensive background in the waste management and civil construction industries and bring this experience into the environmental construction market place. CT's construction personnel have been involved in various aspects of the solid and industrial waste management industry for several decades. CT's staff complement has broad based experience in all aspects of environmental control and construction. CT focuses on health and safety for their personnel on each and every project.

CT provides turn-key services for environmental construction projects. CT more specifically, specializes in soil remediation projects requiring on-site low temperature volatilization options. Various concentrations of hydrocarbon contaminated soil can be processed through our plant since we can accurately control kiln and afterburner temperatures; throughput capacities i.e. 10 to 60 tons per hour; while processing all soil textures and contaminant types. Among other things, this SOQ briefly describes operation of our mobile facility. CT owns and operates the soil processing facility which is herein described

The mobile plant was operated in 1990 and 1991 to remediate various contaminated soils. A stack test was performed in September, 1991, by an independent EPA certified laboratory using appropriate EPA Methods, the results of which can be found under Tab N. A particulates only emission test was completed in 1990. The facility performed at 99.99% removal efficiency for VOC's and particulates.

CT's particular areas of expertise are listed in the following and a description of these areas is contained in the following text.

- **Turn-Key General Contractor Capabilities**
- **Low Temperature Volatilization of Contaminated Soils**
- **Contaminated Soil Excavation and Removal**
- **Tank Removal and Replacement**
- **Familiarity with Rules, Regulations and Permitting**
- **Industrial Waste Site Clean-Ups**
- **Emergency Response Capabilities**
- **Construction Equipment and Maintenance Facilities**
- **Fully Health and Safety Trained Site Personnel**
- **Insurance**

Team Chart and Organization

CT has been organized to complete all types of environmental construction projects. The attached team chart provides an overview of the personnel and affiliate companies from which CT obtains its resources. Additional information on the principals is contained in this SOQ.

ConTeck Environmental Services, Inc.

Team Chart

CHRIS KREGER
PRESIDENT

0 CORPORATE MANAGEMENT
0 PROJECT MANAGEMENT
0 CLIENT LIAISON
0 MARKETING
0 EQUIPMENT MANAGEMENT
0 CONSTRUCTION MANAGEMENT
0 THERMAL PROCESSING
0 EMERGENCY RESPONSE
0 TANK REMOVAL
0 TANK INSTALLATION

CORPORATE SERVICES

0 ENVIRONMENTAL CONTRACTING
0 EMERGENCY RESPONSE
0 LOW TEMPERATURE VOLATILIZATION
0 SOIL STORAGE
0 REMEDIAL ENGINEERING
0 HYDROGEOLOGY
0 LANDFILL SERVICES

VICTORIA KREGER
FINANCE DIRECTOR

0 INVENTORY CONTROL
0 INSURANCE
0 BILLING
0 PROCUREMENT

LAWRENCE HICKS
VICE PRESIDENT

0 MARKETING
0 CONTRACT NEGOTIATIONS
0 SOIL SCIENTIST
0 PROJECT MANAGEMENT
0 HEALTH & SAFETY
0 CLIENT LIAISON
0 AGENCY LIAISON
0 PERMITTING
0 COST ESTIMATES

VAL CARVER
CHEMICAL ENGINEER

0 COMBUSTION ENGINEERING
0 CONSTRUCTION
0 OPERATIONS
0 LONG TERM MAINTENANCE
0 START-UP SERVICES
0 MANUAL PREPARATION
0 AGENCY LIAISON
0 PERMITTING

LEO LABELLE
CHEMICAL ENGINEER

0 CHEMICAL ENGINEERING
0 PLANT MANAGEMENT
0 CLIENT LIAISON
0 MONITORING
0 QUALITY ASSURANCE
0 PROJECT MANAGEMENT
0 PERSONNEL MANAGEMENT

JOHN CANNON, P.E.
ENVIRONMENTAL ENGINEER

0 PROJECT MANAGEMENT
0 COST ESTIMATES
0 BID PREPARATION
0 REPORT PREPARATION
0 SITE ENGINEERING
0 CADD
0 PERMITTING

CURT ROTHI
MECHANICAL ENGINEER

0 AUTOMATION/CONTROLS
0 ELECTRICAL SYSTEMS
0 START-UP SERVICES
0 OPERATIONS
0 MAINTENANCE
0 TROUBLE-SHOOTING

FIELD SUPPORT STAFF

0 OPERATIONS 0 MAINTENANCE 0 MONITORING 0 SAMPLING

QUALIFICATIONS AND EXPERTISE

Turn-key General Contracting

Successful contractors in the clean-up industry recognize that the completion of successful cost effective environmental projects requires a highly trained and skilled work force. This is also the most limiting factor to success for individual contractors because they don't know how to gain access to talented personnel. Seasoned site managers must have the skills to organize and complete various job components. Pooling the resources of various companies provides more personnel depth, capital, and equipment. We use qualified local small business subcontractors when possible.

Low Temperature Volatilization of Contaminated Soils

CT operates a state-of-the-practice Low Temperature Volatilization (LTV) plant to treat hydrocarbon contaminated soils. This plant has a afterburner, cyclones and a baghouse for air emissions control and pollution prevention. After the contaminated soil is processed, residual volatile organics are no longer present in the processed soil. The soil, once clean, can be safely "recycled" for other purposes. This process is legally recommended and as the safest, most cost effective alternative available within the clean-up industry. The plant is portable and can be moved to off-site projects requiring this processing alternative.

CT's plant includes the most advanced emission control and monitoring equipment currently available. This plant uses a rotary kiln thermal processing technique to process the soil. Only soil contaminated with petroleum-based residuals will be processed with the plant. The process volatilizes and destroys these petroleum compounds, effectively removing them from the soil, while destroying the volatilized constituents in a afterburner.

LTV remediation offers the following advantages:

- Expedience - site clean-up is accomplished rapidly.
- Cost Competitive - processing cost is competitive with all other remedial alternatives.
- Performance - actual stack test results prove the plant performs.

- Mobility - the plant includes to semi-trailers of equipment. Mobilization is fast to your site.

- Technically Acceptable - soil can be effectively processed and left on-site with no additional future treatment or monitoring costs.

- Legal Liabilities - site clean-up levels will greatly reduce site environmental liabilities related to hauling the soil off-site.

The LTV plant is operated in a manner which is highly protective of all aspects of the environment. Hydrocarbon and dust emissions have been thoroughly addressed during design and equipment selection. ConTeck will not operate the processor on days when weather conditions are not conducive to environmental protection.

Contaminated Soil Excavation and Removal

Contaminated soil excavation and removal includes spill containment and product recovery. CT is aware of these procedures and can effectively complete these activities for emergency response situations and site remedial clean-ups. Any type of contaminant removal can be completed by CT.

Tank Removal and Replacement

Our personnel have completed all aspects of these projects to remove underground storage tanks which contained gasoline, fuel oil, and other raw products. Fiberglass, double and single walled steel tanks, and all ancillary fittings, piping, pumps, monitoring devices have been installed. This has included completion of soil backfilling, concrete pad replacement and landscaping.

Familiarity with Rules, Regulations and Permitting

CT personnel have been involved in numerous projects requiring various types of rules and regulations. CT has been involved with all aspects of environmental projects involving local units of government, i.e., municipalities, townships, counties; various state regulatory agencies; and federal agencies including the US EPA, Army Corps of Engineers, and USATHAMA in completing various environmental and construction projects.

CT successfully underwent very rigid stack testing in 1991. Stack test results indicate the plant performs in excess of 99.99% destruction efficiency for petroleum volatiles and particulate stack emissions. CT currently holds air emission permits in many States and will meet emission requirements for all States. Every project CT endeavors to complete requires local permits ,as well as, State permits. CT completes all levels of permitting depending on project requirements.

Industrial Waste Site Clean-up

CT specializes in the excavation and removal of various industrial waste site facilities. These have included removing former landfill and dump facilities, demolition debris sites, buried drums and unknown wastes. All excavation projects are thoroughly planned from preparation of the initial health and safety plan to complete removal and disposal of residual wastes.

Emergency Response Capabilities

CT can be available for emergency response situations. CT has equipment and personnel available during all seasons of the year.

The liability associated with doing a job inadequately or wrongly by a contractor or client can have devastating financial impacts. CT uses the best resources available to complete all work elements, therefore minimizing risk and legal exposure for contracted clients. CT's principals have been involved in both environmental and civil construction projects which has given them additional insight into co-venturing with specialty subcontractos and general contracting.

Construction Equipment and Maintenance Facilities

CT has unlimited access to equipment and maintenance facilities. Back hoes, bulldozer's, semi-trucks and trailers, dump trucks are readily available throughout all seasons of the year at all hours of the day. CT will provide equipment and personnel to fit the client's needs. CT has leasing and finance agreements with several national capital equipment suppliers to obtain all required equipment for project completion.

Fully Health and Safety Trained Site Personnel

CT personnel are all health and safety trained according to OSHA, State and Federal requirements. All personnel working in construction zones requiring this training will be appropriately trained. This includes site managers, equipment operators, and monitoring personnel depending on project requirements.

Insurance

CT maintains policies for Comprehensive General Liability ranging from $1.0M to $3.0M depending on project needs. In addition, CT maintains statutory levels for Worker's Comprehensive coverage. Certificates of insurance can be found in the attachments to this SOQ.

KEY CORPORATE AND STAFF RESUMES

ConTeck Environmental Services, Inc.

The principals involved in CT have a wide range of experience in environmental regulation, permitting, and construction. They also have developed an extensive network of knowledge through their association with other companies involved in the environmental service fields.

Mr. Chris Kreger, President of ConTeck Environmental Services, has extensive experience in environmental projects. Mr. Kreger has been involved with the ownership, construction and operation of various industrial and solid waste types of facilities.

Mr. Kreger's involvement in these types of activities has lead to resolution of many problematic situations dealing with hydrogeology, geology, hazardous waste disposal, public education, public relations, remedial construction, education and safety. Mr. Kreger's past experience has also enabled him to develop excavation plans with specific experience in road building, site grading, and landfill construction, ditching, wetland enhancement, clearing and grubbing, and soil stabilization.

Mr. Kreger has been intimately involved in permitting of environmental construction projects, including negotiations with Federal, State, County and City Governments, including the Environmental Protection Agency, Army Corps of Engineers and State Departments of Natural Resources, all of whom are involved with permitting and construction activities. These projects have covered regulatory concerns including air quality, ground and surface water issues, and soil contamination. Specifically, Mr. Kreger has been involved with, landfill projects, train derailments, numerous industrial waste disposal problems, general civil and road construction, demolition of buildings, and emergency response.

Mr. Kreger's involvement in these types of projects have lead to a vast pool of knowledge through associations with a multitude of companies and contractors. This brings to CT, a vast array of knowledge which may not be available through other contractors in this type of work. It also allows the flexibility to be creative and efficient with regards to project organization and completion, while allowing CT to use the best people available for a project.

Mr. Lawrence N. Hicks is Vice President of ConTeck Environmental Services, Inc. Mr. Hicks has practiced in many areas of the solid and hazardous waste industry since 1975. Mr. Hicks received his BS. from the University of Wisconsin in 1975 emphasizing soil chemistry and soil physics.

Mr. Hicks was previously employed by a state regulatory agency and spent 12 years with a large national engineering company. With that firm Mr. Hicks had done everything from fieldwork to managing the Environmental Services Department which included supervision and management of personnel practicing geology, hydrogeology, environmental engineering, remedial engineering, Geotechnical engineering, and construction engineering specifically relating to the waste industry. Mr. Hicks also was responsible for project and client management, agency liaison, profit and income management.

Mr. John R. Cannon, P.E., is a senior design engineer on various environmental design projects. Mr. Cannon is directly responsible for the completion of engineering design plans and specifications for various remedial engineering and construction projects. Mr. Cannon is a licensed professional engineer and received his degrees from the University of Wisconsin. Mr. Cannon was previously employed by a midwestern based engineering company where he worked exclusively in the areas of environmental engineering, solid and industrial waste management. Mr. Cannon has completed numerous solid and hazardous waste facility designs, remedial engineering designs, construction plans and permitting documents for operating sites and closure of facilities.

Mr. Leo H. LaBelle, Chemical Engineer, is CT's Operations Specialist. Mr. LaBelle is responsible for operation of our plant while it is at project sites, including sampling and meter calibration. Mr. LaBelle has completed BS and MS degrees in chemical engineering at the University of North Dakota. Mr. LaBelle's previous experience within the petrochemical industry provides him with an expert level background in hydrocarbon chemistry. Mr. LaBelle will supervise the activities of all other field personnel assigned to complete a project. Generally, two shift operation of the soil remediation unit will require eight field personnel.

Mr. Val B. Carver, Chemical Engineer, provides CT with technical input on permitting, stack testing, plant operations, trouble-shooting and start-up. Mr. Carver has completed BS and MS degrees in chemistry and chemical engineering specializing in incineration and thermodynamic design. Mr. Carver's technical background since 1979, evolved within the high temperature rotary kiln/hazardous waste industry. He is a former Director of Researc and Development for a national incinerator design and manufacturing company. Mr. Carver has designed, operated and served as trouble shooter on numerous governmental or privately owned incinerators across the United States and Canada. He has designed and built various waste rotary or fixed kiln and boiler systems; air pollution control systems, i.e. electrostatic precipitators, baghouses, venturies, afterburners, cyclones, wet washers for various industrial and hazardous waste applications. Mr. Carver often provides "hands-on" expertise in mechanical and electrical trouble-shooting. He holds certifications and licenses for boiler operations and electrical installations.

Mr. Curt Rothi, Mechanical Engineer. Mr. Rothi is responsible for electrical and mechanical components of the plant. These include electrical controls, blowers, burners, motors, conveyors, etc. He has a B.S. degree in mechanical engineering from the University of Minnesota. He has served as a national field maintenance representative for a manufacturer/supplier of controls, blowers and burners.

APPENDIX A

LOW TEMPERATURE VOLATILIZATION SYSTEM SPECIFICATIONS

PROCESS AND EQUIPMENT INFORMATION

A block flow diagram for the soil recycling unit (SRU) is attached. The equipment items are also discussed in the following narratives.

At this time it has been demonstrated that approximately 60 tons per hour can be processed through the facility. However, it must be noted that the actual retention time and processing capacity will be dictated by the soil type, soil moisture, and contaminant levels. If it is deemed appropriate to recondition specific batches or loads, the soil is simply placed back onto the storage pile for inputting back through the system.

The contaminated soil is fed into the rotary drum desorber via a conveyor belt. When appropriate, the soil will be preprocessed through a screened pulverizer to remove stones and crush large soil masses. Once into the rotary drum desorber, which is a 21-foot long, 7-foot diameter rotating cylinder, the soil is heated to 350 - 850 degrees Fahrenheit (as contamination dictates). At this temperature the organic constituents of the soil are volatilized and released from the soil surface. The flue gas from the desorber is routed through a afterburner for additional conditioning at a temperature of 1450 - 1850 degrees Fahrenheit to remove remaining volatilized organic compounds. The afterburner is a 15'5"-foot long by 8'6"-foot diameter soft wall furnace type, heated by a liquid petroleum burner. The reconditioned soil meanwhile is discharged to a stockpile for reuse.

Prior to the afterburner, the waste gases move through a cyclone and baghouse to remove particulates. The residue removed from the baghouse is a non-hazardous dust and grit.

MONITORING AND CONTROLS

The instrumentation and controls for the facility are contained in a control house located near the plant. The controls continuously monitor temperatures of the soil within the desorber, afterburner and baghouse inlet. All temperatures are continuously monitored by the plant operator to instantaneously provide plant operating conditions. Temperatures within each of the units can be controlled through the control system. The temperature of the desorber outlet gas, desorber soil outlet, afterburner outlet and system draft are either direct dial or digital readouts. The temperature of the afterburner outlet is continuously recorded on a strip chart recorder.

Monitoring of the recycling facility occurs using several methods of evaluation. Periodic stack monitoring will occur for organics and particulate emissions. Also, all soil delivered to the facility is prescreened and analyzed prior to acceptance at the site. Additional sampling is completed for a representative quantity of the reconditioned soil.

TECHNICAL EVALUATION AND STACK TESTING RESULTS

The desorber's combustion of propane vaporizes the soil moisture, plus vaporizes and partially combusts the liquid contaminants increasing the temperature of the working gases from the ambient 60 degrees to about 212 to 400 degrees Fahrenheit. This temperature rise results in an increase in the flue gas volume from approximately 16,730 standard cubic feet of air per minute to about 25,000 actual cubic feet of flue gas per minute.

The propane fuel and liquid contaminants encountered using the system have an extremely low ash content. As a result, there is little particulate other than the soil particles entrained in the gas stream during the vaporizing process in the primary rotary drum. The flue gas leaving the primary rotary drum flows through a cyclone and baghouse collector to remove over 99% of the particulate.

The combustion of additional air, approximately 9,400 standard cubic feet, and propane in the afterburner is used to re-ignite the flue gases and complete the combustion of the contaminants. This further increases the flue gas temperature to 1450 degrees Fahrenheit and a corresponding volume of about 104,600 actual cubic feet per minute.

OPERATING SCHEDULE

CT proposes to operate the facility 12 hours/day, 7 days/week, 12 months/year. CT is also aware that hours of operation will be dependent on the site location and local zoning and land use.

EQUIPMENT LIST

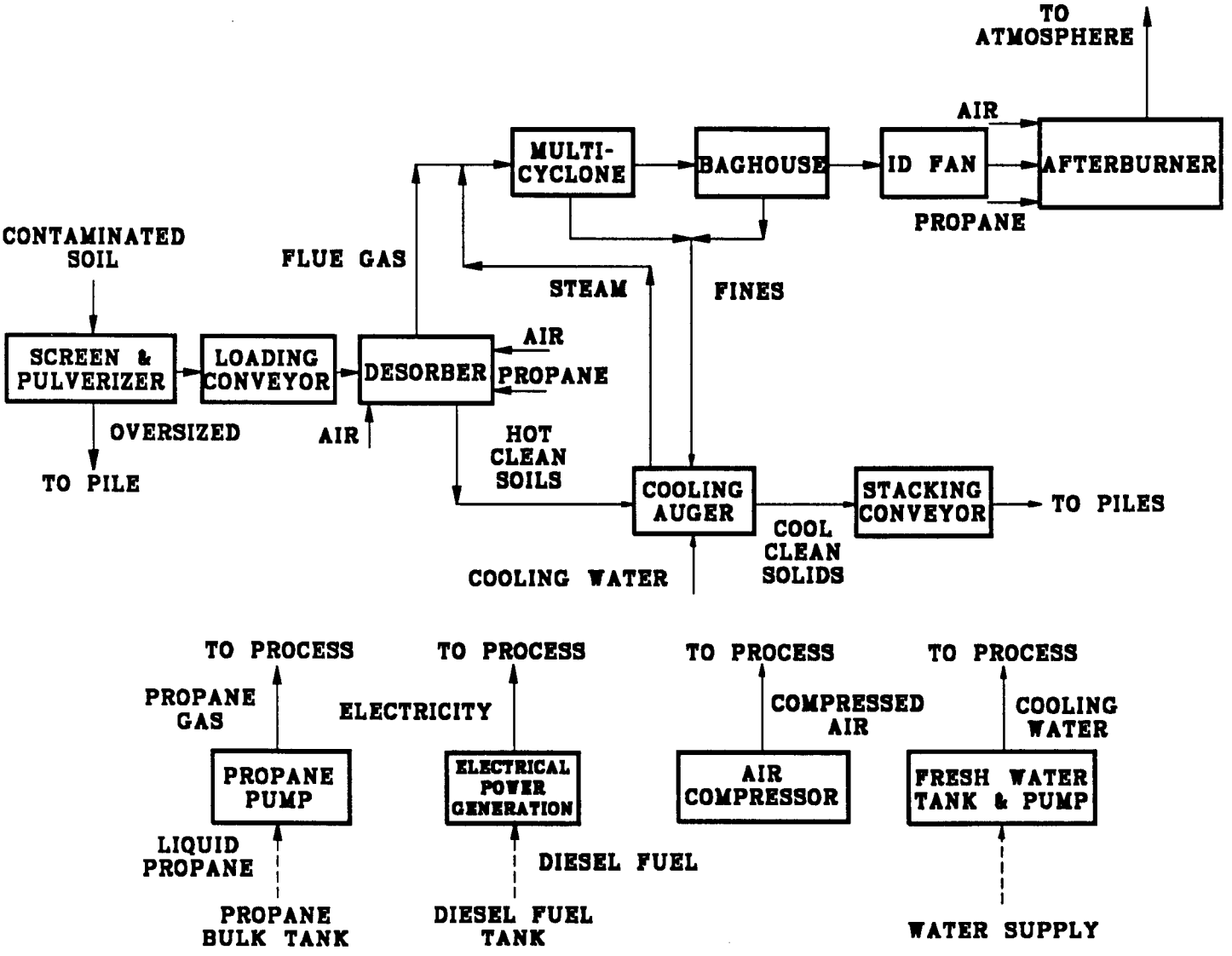
A block flow diagram for the plant is attached.

APPENDIX B

BLOCK FLOW DIAGRAM

CONTECK
ENVIRONMENTAL SERVICES, INC.

SCHEMATIC DIAGRAM
LOW TEMPERATURE VOLATILIZATION UNIT



ConTeck
ENVIRONMENTAL SERVICES, INC.

22460 HIGHWAY 169 NORTHWEST
ELK RIVER, MN 55330

612-441-4965

Minneapolis, Dallas, Elk River, Colton

APPENDIX C

SAMPLING REQUIREMENTS AND INFORMATION

Background - A source may have areas contaminated with different products or combinations of products. Typically, these contaminated areas would be excavated from around a storage tank. The contaminants in question would be those associated with gasoline, oils, and fuel oils typically near tank removal sites, including filling stations or petroleum related industries.

The soil will be treated utilizing a thermal treatment process and then re-used. This Process will remove volatiles from the soil down to a level of less than 10 parts per million. The hydrocarbons released from the soil are then destroyed in an afterburner, and the soil is mixed with water to prevent fugitive dust emissions.

Caution will be exercised to fully evaluate contaminants contained in the loads. Contaminants outside of oil, gasoline, fuel oils, and other petroleum products may not be acceptable for the storage or processing facility. PCB contaminated wastes or wastes with excessive amounts of free moisture or product may not be acceptable.

Testing Requirements - Soil from each site or area with a different product involved must undergo:

a. An Toxicity Characteristic Leach Procedure (TCLP) test for the 8 RCRA metals, if there is the potential for waste oil contamination or the total lead analysis exceeds 90 ppm,

b. A determination of Flashpoint if contaminate level is greater than 500 ppm,

c. Moisture content analysis,

d. Grain size analysis or certification utilizing the Unified Soil Classification system,

e. And applicable tests as defined in Table 2: "Soil and Ground Water Analysis at Petroleum Release Sites".

A representative sample must be collected and tested for each waste type and/or site in accordance with the excavation testing requirements below. This table also lists the maximum concentrations allowable without "cutting" the material.

TABLE 1

Volume of Soil in cubic yards	Number of Samples	Constituent	Maximum Concentration (PPM)
0-50	1	Benzene	1,000
50-500	2	Toluene	10,000
500-1000	3	Ethyl Benzene	10,000
1000-2000	4	Xylene	10,000
2000-4000	5	Lead	135
Ea. Add. 2000	1	THC Fuel Oil	45,000
		THC Gasoline	40,000

Data Submission - All soil from each source must be pre-approved prior to processing. Copies of the analytical test results must be provided to ConTeck. Documentation describing the method of sample collection shall accompany the test results. The soil must not contain excessive quantities of free water or product which could pose operational concerns or contain a constituent that would classify the soil as a hazardous waste.

TABLE 2

SOIL AND GROUND WATER ANALYSIS AT PETROLEUM RELEASE SITES

Petroleum Product	Soil	Water
Unleaded Gasoline	B, C, & D	A, C, & D
Regular Gasoline Aviation Gasoline	B, D, & F	A, D, & F
Fuel Oil (Any Grade, Tanks >1100 gallons) Diesel Fuel, Kerosene, Jet Fuels, Mineral Oil/Spirits, Hydraulic Fluids, Motor Oil	B, & E	A, & E
Fuel Oil (Any Grade, Tanks < 1100 gallons)	B, & E	B, & E (Note 1
Petroleum Solvents	A, & E	A, & E
Waste Oil, Any Waste Petroleum Product	A, E,G, & H2	A, E, G, & H1
Quench Oil, and Metal Cutting Oils	A, E, H2, & I	A, E, H1, & I
Unknown Petroleum or Hydrocarbon Mixture	A, C, D, E, & G	A, C, D, E, & G
Crude Oil	Site Specific	Site Specific

Analysis Type:

A - Volatile Hydrocarbons (Note 2)
B - Benzene, Ethyl Benzene, Toluene, and Xylenes (BETX) EPA 8020
C - Methyl Tertiary Butyl Ether (MTBE)
D - Total Hydrocarbons as gasoline
E - Total Hydrocarbons as Fuel Oil
F - Lead
G - Lead, Chromium, and Cadmium
H - Polychlorinated Biphenyl's (PCB's)
    1. In Water, (EPA 608)
    2. In Soils and Sediments, (EPA 8080)
I - Lead, Mercury, Arsenic, Cadmium and Chromium

Notes:

1. Polyvinyl Chloride (PVC) monitoring wells may be constructed for monitoring fuel oil tanks with capacities less than (<) 1,100 gallons

2. Volatile hydrocarbon analysis (requiring steel constructed monitoring wells) is required for the first round of ground water samples. Use US. Environmental Protection Agency protocol and approved methods, and analyze for a list of parameters similar to those listed under Minnesota Department of Health (MD) method 465, including benzene, ethyl benzene, toluene, Xylenes, 1,2-dibromoethane (ethylene dibromide - EDB) and 1,2-dichloroethane (ethylene dichloride - EDC). Analysis requirements for future sampling events will be site specific.

3. Additions or exceptions to the above requirements may be considered on a case by case basis due to site specific conditions.

4. The method detection limits for laboratory analysis of volatile constituents in undiluted ground water samples should be similar to those reported by the MDH for method 465.

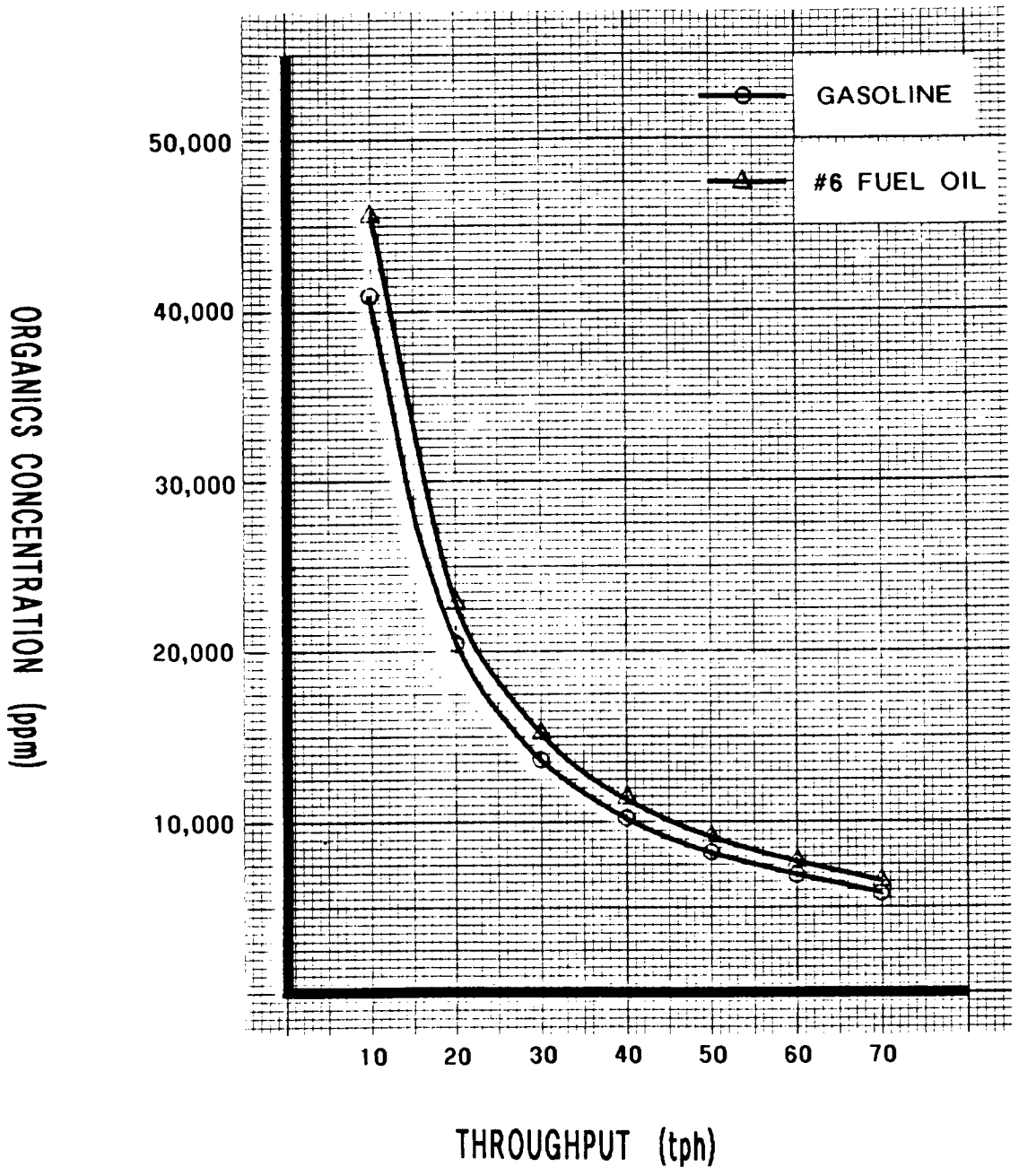
APPENDIX D

MAXIMUM PROCESSING CAPACITY CHARTS

ConTeck
ENVIRONMENTAL SERVICES, INC.

SRU Model CT-50LTB

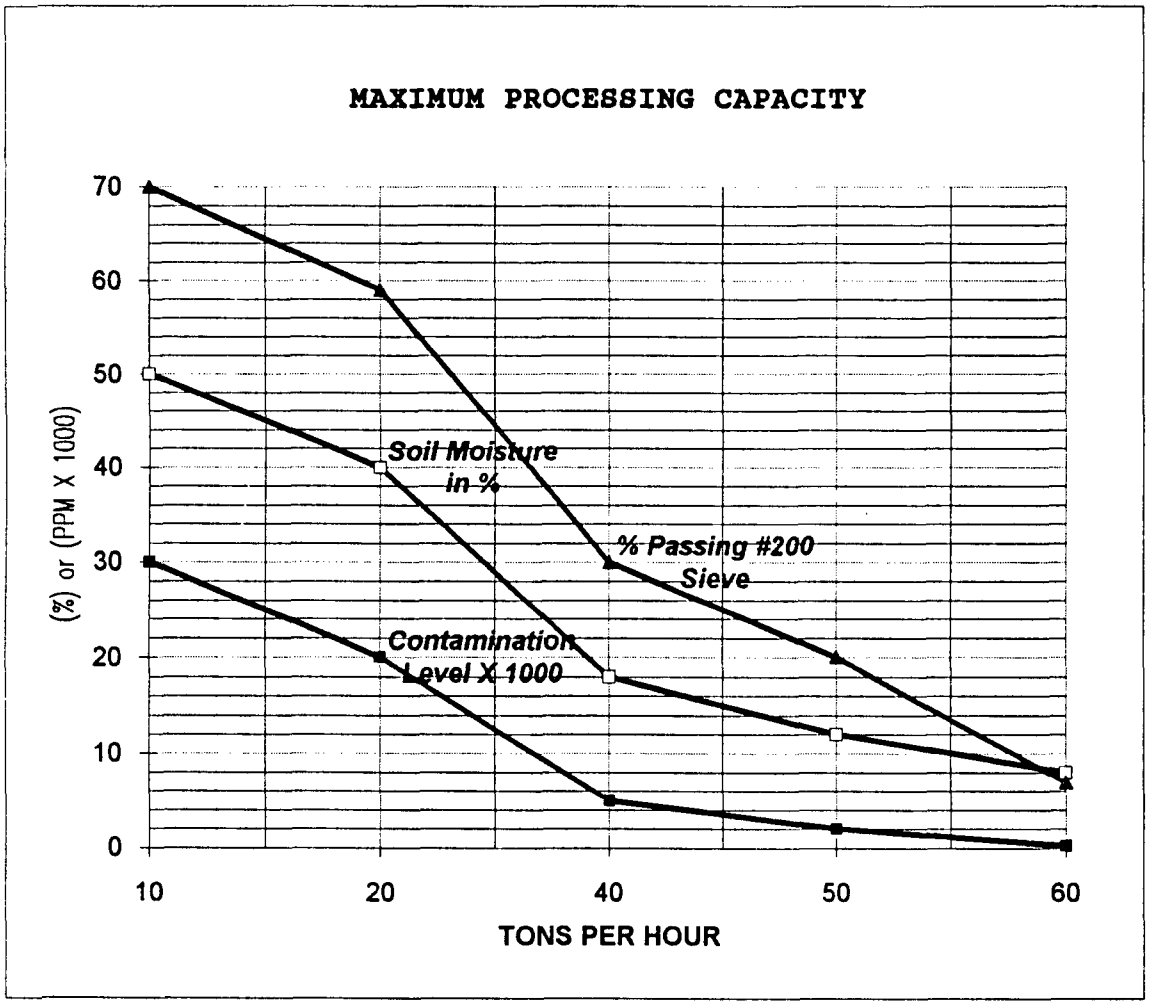
THROUGHPUT vs ORGANICS CONCENTRATION



NOTE: #1 FUEL OIL & #2 FUEL OIL lie between the 2 curves shown.

BASIS: Maximum organics load to the Afterburner of 16,510,000 BTU/hr.

FIGURE 2



Contaminant Factor	
Gasoline	4.00
#1 Fuel Oil	1.00
#2 Fuel Oil	0.75
#5 Fuel Oil	0.50
Napthalene	0.33

To determine average throughput: [(TPH % passing #200 Sieve)+(TPH Soil Moisture)+ (TPH Contamination Level X Contaminant Factor)]/3 = Approximate Tons Per Hour

pace
INCORPORATED
THE ASSURANCE OF QUALITY

RESULTS OF THE SEPTEMBER 9 AND 10, 1991 PARTICULATE, LEAD, AND ORGANICS EMISSION COMPLIANCE TESTING ON THE SOIL INCINERATOR STACK AT THE CONTECK ENVIRONMENTAL SERVICES, INC. FACILITY LOCATED IN ELK RIVER, MINNESOTA

Prepared for:	Mr. Chris Kreger ConTeck Environmental Services, Inc.
Prepared by:	PACE, Incorporated 1710 Douglas Drive North Minneapolis, MN 55422
PACE Project No:	910813.401
Date:	October 16, 1991

Field sampling was performed by me and personnel under my direct supervision.

Curtis H. Stock
Project Field Supervisor

All sampling, analysis and data reduction were performed by PACE, Incorporated under my supervision

T. Roland Nelson
Project Manager, Air Sampling Department

EXECUTIVE SUMMARY

PACE Incorporated was contracted by ConTeck Environmental Services, Inc. to perform particulate, lead, total hydrocarbon and volatile organic compound testing on the Soil Incinerator at their facility located in Elk River, Minnesota. These series of tests were conducted on September 9 and 10, 1991. The highlight results are summerized below:

PARAMETER	Run 1	Run 2	Run 3	Average
Date of Run	9/9/91	9/9/91	9/10/91	
Particulate Concentration				
Particulate (GR/DSCF)	0.024	0.028	0.029	0.027
Particulate Emission Rate				
Particulate (LB/HR)	2.3	2.5	2.7	2.5
Opacity (%)	0			0
Lead Concentration				
Lead (µg/dscm)	< 1.3	1.8	< 1.5	< 1.5
Lead Emission Rate				
Lead (LB/HR)	< 0.00005	0.00006	< 0.00005	< 0.00005
Total Hydrocarbon Concentration				
THC (PPM, C-1 Wet)	2.5	4.1	8.0	4.9
Total Hydrocarbon Emission Rate				
Total Hydrocarbons (LB/HR-C1)	0.07	0.12	0.22	0.14
VOC Concentration (PPB v/v)				
Benzene	11	< 3	320	111
Toluene	3	< 3	37	14
Ethyl Benzene	< 3	< 3	< 5	< 4
m&p-Xylene	< 5	< 5	< 10	< 7
VOC Emission Rate (LB/HR)				
Benzene	0.00163	< 0.00043	0.04502	0.01569
Toluene	0.00058	< 0.00051	0.00614	0.00241
Ethyl Benzene	< 0.00050	< 0.00049	< 0.00096	< 0.00065
m&p-Xylene	< 0.00101	< 0.00098	< 0.00191	< 0.00130

INTRODUCTION

PACE, Incorporated personnel conducted particulate, lead, total hydrocarbon and volatile organic compound emissions compliance testing on the soil incinerator stack at the ConTeck Environmental Services, Inc. facility located in Elk River, Minnesota. On-site testing was performed by a four member team consisting of C. Stock, M. Loftus, J. Pederson and T. Bush. Coordination between plant and testing activities was provided by Chris Kreger of ConTeck Environmental Services, Inc. through direct contact with the test team leader. Testing was witnessed by Carolina Schutt with the Minnesota Pollution Control Agency and Matthew Ledvina with Bruce A. Liesch Association, Inc. The testing consisted of three independent one-hour samplings for particulate with concurrent integrated gas sampling for orsat analyses, visible emission evaluation by a certified observer, and independent sampling for lead emissions. Total hydrocarbon and volatile organic compound emissions were also determined. Numerous soil samples were gathered and analyzed for petroleum and other organic compound content.

The objectives of this project were to quantify particulate, lead, and VOC emissions and compare them to applicable air emissions regulations stipulated by Minnesota Rules. Special provisions for this test program include operating at near maximum capacity.

Results are summarized in the next section followed by descriptions of the process under investigation and test methods. All supporting data are included in subsequent appendices.

RESULTS SUMMARY

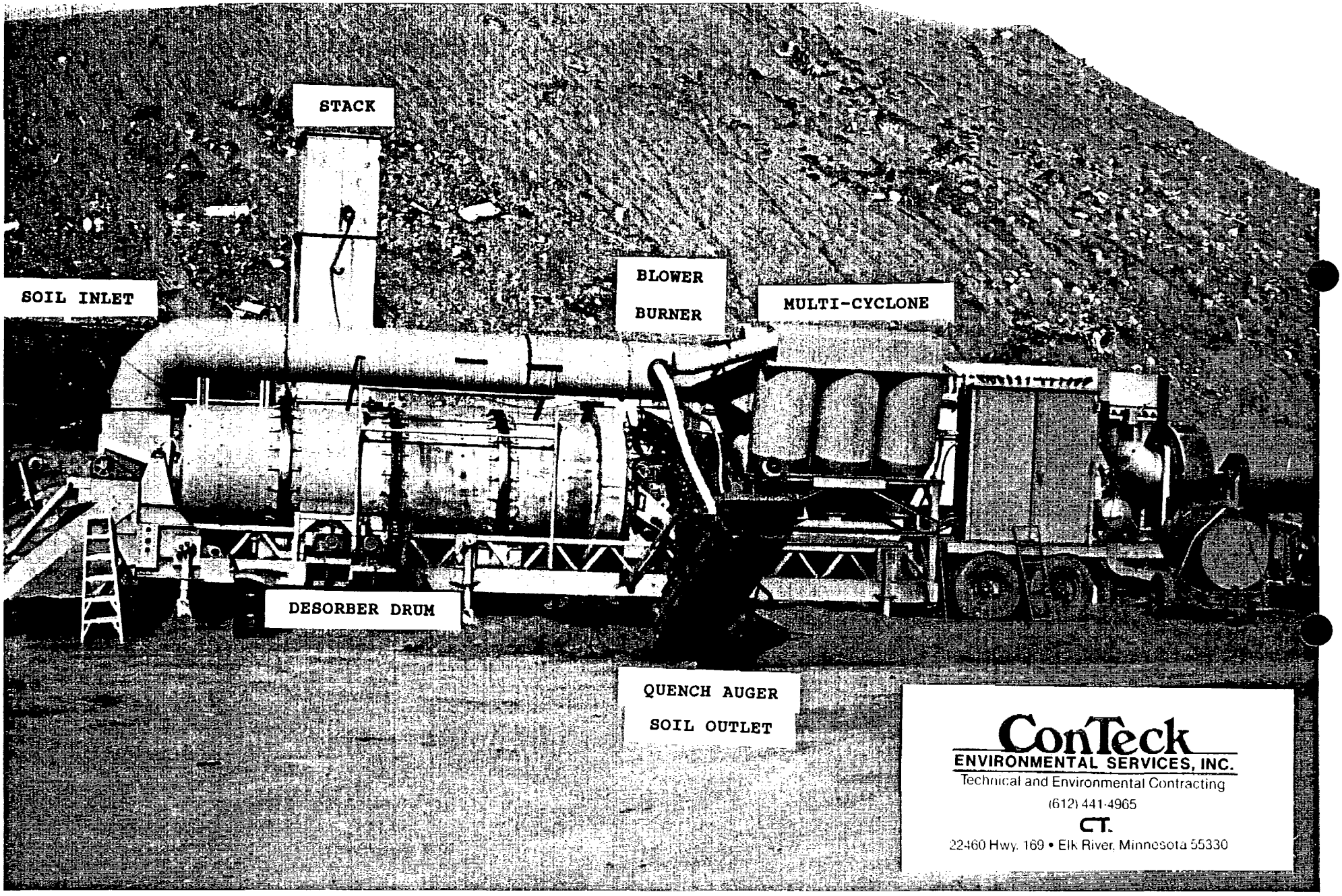
Results of particulate determinations and gas composition are summarized in Table 1. The particulate emission rate averaged 2.5 LB/HR at an average particulate concentration of 0.027 GR/DSCF. The results of lead determinations and gas composition are summarized in Table 2. The lead emission rate averaged less than 0.00005 LB/HR at an average concentration of less than 1.5 ug/dscm.

Opacity observations were recorded every 15 seconds for a one hour time period during the first run of the lead emission testing. These results are shown in Table 6. All of the 240 observations were zero percent. Within the one hour observation period, the highest average opacity for a consecutive six minute time span was zero percent. The average opacity for the one-hour time period was zero percent.

Results of total hydrocarbon analysis are shown in Table 8. The THC emission rate averaged 0.14 LB/HR-C_1 at an average concentration of 4.9 ppm-C_1.

The results of volatile organic compound analysis are shown in Table 9. The most prevelant compound detected was benzene at an average concentration of 111 PPB v/v. Toluene was detected at a concentration of 14 PPB v/v, ethyl benzene at less that 4 PPB v/v, and m&p xylene at less than 7 PPB v/v. Trace amounts of tetrachloroethene, styrene and 1,2,4-trimethylbenzene were also detected. The results of benzene, toluene, ethyl benzene and xylene soil analysis can be found in Appendix B.

No problems were encountered in the sampling or analyses of emissions samples. On this and after complete review of test values, we believe that the results reported herein are an accurate representation of the source conditions at the time of the test.



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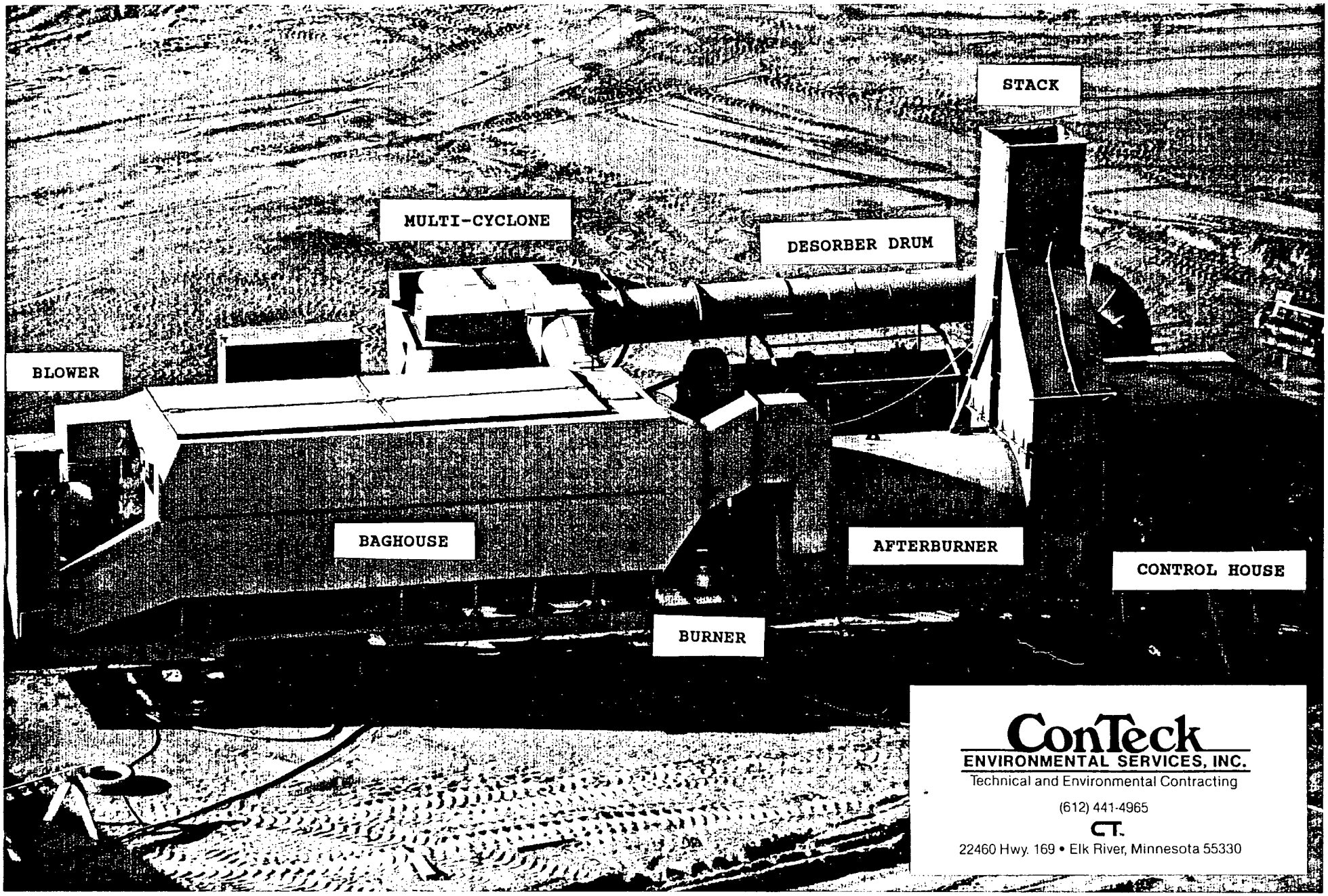
Technical and Environmental Contracting
(612) 441-4965
CT.
22460 Hwy. 169 • Elk River, Minnesota 55330



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APPENDIX G

INSURANCE CERTIFICATES

Minnesota Workers' Compensation Assigned Risk Plan
Standard Workers' Compensation & Employers' Liability Contract

Contract Administrator
Berkley Administrators *formerly* EBA
P.O. Box 59143 Minneapolis, Minnesota 55459-0143
Phone (612) 544-0311

CERTIFICATE OF COVERAGE

The Certificate is issued as a matter of information only and confers no rights upon the Certificate Holder. This Certificate does not amend, extend or alter the coverage afforded by the Contract listed below.

NAME AND ADDRESS OF CONTRACT HOLDER

CONTECK ENVIRONMENTAL SERVICES INC

22460 HIGHWAY 169 NW
ELK RIVER MN 55330

CONTRACT PERIOD:

FROM : 04/20/1991
TO : 04/20/1992
CONTRACT NO. : 04-056056

This is to certify that the Contract of Coverage described herein has been issued to the Contract Holder named above and is in force at this time. 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 coverage afforded by the Contract described herein is subject to all the terms, exclusions and conditions of such Contract.

TYPE OF COVERAGE	LIMITS OF LIABILITY
Part One Workers' Compensation	Statutory
Part Two Employers' Liability	Bodily Injury by Accident $100,000 each accident Bodily Injury by Disease $500,000 contract limit Bodily Injury by Disease $100,000 each employee

Should the above Contract be canceled before the expiration date thereof, the Plan will endeavor to mail 30 days written notice to the below named Certificate Holder, but failure to mail such notice shall impose no obligation or liability of any kind upon the Plan.

Certificate Holder's Name and Address:

[redacted]

RECEIVED MAR 0 6 1992

Corporate Officers
Not Covered Under
This Policy

Agent's Name and Address:
A B I GROUP
7701 YORK AV S,#200
MINNEAPOLIS, MN 55435

Date Issued: 03/03/1992

Authorized Representative

BA 314CG (5/91)

CERTIFICATE OF INSURANCE

2/28/92

PRODUCER

American Business Insurance

Agency, Inc.

7701 York Avenue South #200

Minneapolis, MN 55435

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW

COMPANIES AFFORDING COVERAGE

COMPANY LETTER	A	GENERAL STAR INDEMNITY
COMPANY LETTER	B	
COMPANY LETTER	C	
COMPANY LETTER	D	
COMPANY LETTER	E	NORTHBROOK PROPERTY & C

INSURED

ConTech Environmental Service

Attn: Mr. Chris Kreger

22460 Highway 169 N.W.

Elk River MN 55330

COVERAGES

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.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFF. DATE (MM/DD/YY)	POLICY EXP. DATE (MM/DD/YY)	LIMITS	
A	GENERAL LIABILITY	IYG300110A	9/14/91	9/14/92	GENERAL AGGREGATE	2000000
	X COMM. GENERAL LIABILITY				PROD-COMP/OP AGG.	1000000
	X CLAIMS MADE ___ OCC.				PERS. & ADV. INJURY	1000000
	OWNER'S & CONTRACT'S PROT				EACH OCCURANCE	1000000
					FIRE DAMAGE(One Fire)	50000
					MED. EXP. (One Per)	5000
	AUTOMOBILE LIABILITY				COMBINED SINGLE LIMIT	
	ANY AUTO					
	ALL OWNED AUTOS				BODILY INJURY (Per person)	
	SCHEDULED AUTOS					
	HIRED AUTOS				BODILY INJURY (Per accident)	
	NON-OWNED AUTOS					
	GARAGE LIABILITY				PROPERTY DAMAGE	
	EXCESS LIABILITY				EACH OCCURANCE	
	UMBRELLA FORM				AGGREGATE	
	OTHER THAN UMBRELLA FORM					
	WORKER'S COMPENSATION AND EMPLOYEES' LIABILITY				STATUTORY LIMITS	
					EACH ACCIDENT	
					DISEASE-POLICY LIMIT	
					DISEASE-EACH EMP.	
E	OTHER EQUIPMENT ACTUAL CASH VALUE	67502721	11/27/91	11/27/92	$900,000 TOTAL LIMI $5,000 DEDUCTIBLE	

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS

CERTIFICATE HOLDER

[redacted]

2-45

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE Laurent T. Laurent

ACORD 25-S (7/90)