



**METRO**

MAIL THIS APPLICATION TO:

DATE RECEIVED BY METRO:

Metro Finance and Administrative Services  
Solid Waste Compliance and Cleanup  
600 NE Grand Avenue  
Portland, OR 97232-2736  
(503) 797-1835

MAR 2 '15 PM 3:23

Date of Pre-Application Conference: Application is to Renew Permit No. L-121-11

## Solid Waste License Application Non-Putrescible Waste Reload Facility

### PART 1 - Standard License Application Information

Applicants applying to conduct reloading of non-putrescible waste must provide the following information:

1. Applicant (Proposed Licensee)	
Facility Name:	Thermo Fluids, Inc.
Company Name:	Thermo Fluids, Inc.
Street Address:	12533 SE Carpenter Drive
Mailing Address:	12533 SE Carpenter Drive
City/State/Zip:	Clackamas, OR 97015
Registered Agent	Eric Spencer
Contact Person:	Ryan Partridge
Phone Number:	602.272.2400 ext. 1004
Fax Number:	602.272.5590
E-mail Address:	ryan.partridge@thermofluids.com

2. Proposed Licensee's Owner or Parent Company (provide information for all owners)	
Name:	Thermo Fluids, Inc.
Address:	8925 E Pima Center Pkwy, Suite 105
City/State/Zip:	Scottsdale, AZ 85258
Phone Number:	480.302.6221

Fax Number:	<b>480.302.6599</b>
E-mail Address:	<b>ryan.partridge@thermofluids.com</b>

<b>3. Site Operator (if different from Proposed Licensee)</b>	
Company Name:	
Contact Person:	
Street Address:	
Mailing Address:	
City/State/Zip:	
Phone Number:	
Fax Number and E-mail Address:	

<b>4. Site Description</b>			
Tax Lot(s): <b>22E4B2600</b>	Section: <b>14</b>	Township: <b>025</b>	Range: <b>2E</b>

<b>5. Land Use</b>	
Present Land Use Zone:	<b>Industrial</b>
Is proposed use permitted outright?	<b>Yes, proposed use is has not changed since original permit was issues back in March 2011. This is to renew the existing permit number L-121-11.</b>
<input type="checkbox"/> If yes, attach a copy of a completed Metro or DEQ Land Use Compatibility Statement. (See also, Attachment F requirements)	
Is a conditional use permit (CUP) necessary for the facility?	<b>No, proposed use is has not changed since original permit was issues back in March 2011. This is to renew the existing permit number L-121-11.</b>
<input type="checkbox"/> If yes, attach a copy of the CUP.	
Are there any land use issues presently pending?	<b>No pending issues exist.</b>
If yes, explain:	
Are any DEQ permits required?	<b>No additional DEQ permits are required</b>
<input type="checkbox"/> If yes, list them and attach copies with this application. (See also, Attachment G requirements)	
Are any other local permits required? If yes, list them (see Attachment H requirements).	<b>No additional local permits are required.</b>

6. Land Owner	
Is the applicant the sole owner of the property on which the facility is located?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO (If you answer "NO", complete the rest of the information requested in this section and attach a copy of the Property Use Consent Form, signed by the owner(s) of the property. See Attachment J)
Name of Property Owner:	IDM
Mailing Address:	1498 SE Tech Center Place, Suite 150
City/State/Zip:	Vancouver, WA 98683
Phone Number:	360.567.0201

7. Public/Commercial Operations			
Will the facility be open to the public?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	
Will the facility be open to non-affiliated commercial solid waste collectors?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	
Will the facility be open to solid waste collection companies that collect waste from outside the boundary of Metro?	<input checked="" type="checkbox"/> YES <small>**Transfer trailers from other TFI sites within the region will be sending approved wastes to Clackamas for consolidation and disposal. All waste is tested for hazardous characteristics prior to acceptance.</small>	<input type="checkbox"/> NO	
Operating Hours and Traffic Volume:	PUBLIC	COMMERCIAL AFFILIATED	COMMERCIAL NON-AFFILIATED
Operating Hours	N/A	7am - 5pm	N/A
Estimated Vehicles Per Day	N/A	1-2	N/A

8. Solid Waste To Be Accepted and Activities Conducted	
For each material type accepted at the facility, list the expected posted public tip fee: (attach additional pages if necessary)	
WASTES / MATERIALS TO BE ACCEPTED	EXPECTED PUBLIC TIP FEE
Oil contaminated absorbent and debris	N/A
Petroleum contaminated soil	N/A
Grease	N/A
Describe the purpose (activities to be performed and waste types to be received) of the proposed facility. Include an estimate of the quantity of waste to be received annually.	

WASTE TYPE	PURPOSE	QUANTITY
Oily Debris/Absorbent	Consolidated into open tops and disposed of once full	38 tons
Petroleum Contaminated Soil	Consolidated into open tops and disposed of once full	6 tons
Grease	Consolidated into open tops and disposed of once full	2 tons

Solid Waste, and/or Solid Waste Residual from processing of Solid Waste, delivered to this facility will be reloaded for transport to the following facility or facilities: (Please list all facilities and include additional pages if necessary.)

FACILITY NAME	WASTE TYPE	WASTE QUANTITY	PURPOSE *
Wasco Landfill (Arlington, OR)	Oily Debris / Absorbent	38 tons	Landfill Disposal
Wasco Landfill (Arlington, OR)	Oil Contaminated Soil	6 tons	Landfill Disposal
Wasco Landfill (Arlington, OR)	Grease	2 tons	Landfill Disposal

\* For example: Disposal, Inert Fill, or Useful Material

Provide the name, address and function of all subcontractors involved in the facility operations:

NAME	ADDRESS	FUNCTION
N/A	N/A	N/A

List the anticipated quantity of wastes to be accepted annually.

BY GENERATOR TYPE:

	Tons Received	Tons Recovered	Tons Residual
• Commercial:	<del>14</del> <sup>PP</sup> 12 Tons	N/A	N/A
• Industrial:	34 Tons	N/A	N/A
• Residential:	N/A	N/A	N/A
TOTAL	48 <sup>PP</sup> 46 Tons	N/A	N/A

<u>BY WASTE TYPE:</u>	Will you recover materials from this waste?			Estimate of the maximum and typical lengths of time required to process each day's receipt of each waste / material type:
	Tons	YES	NO	
• Non-Putrescible Wastes:				
• Source-Separated Recyclables:				
• Source-Separated Yard Debris:				
• Special Wastes:	38		X	Varies
• Inerts:				
• Petroleum Contaminated Soil:	6		X	Varies
• Other: <b>GREASE</b>	4		X	Varies

## **PART 2 – Standard Attachments to License Application (License application continued)**

- ❑ All of the following attachments (Attachments A – J) are required and must be submitted in order for a license application to be considered complete. Each attachment must be clearly labeled.
- ❑ Application submittals such as facility design, building plans, site plans and specifications must be prepared, as appropriate, by persons licensed in engineering, architecture, landscape design, traffic engineering, air quality control, and design of structures.
- ❑ Applicants who have previously submitted copies of permits, site plans, facility design plans, or other attachments required herein, are not required to re-submit such documents if the documents on file at Metro are current.

### **ATTACHMENT A: SITE PLAN**

The applicant must submit a facility site plan that includes scaled maps and drawings showing the location of the facility at an appropriate scale, and no smaller than one inch equals 30 feet. The following information must be provided:

- |     |   |
|-----|---|
| (1) | Boundaries of the facility.   |
| (2) | Property boundaries, if different.  |
| (3) | Location of all buildings on the property (existing and proposed) and other pertinent information with respect to the operation of the facility, to include: <ul style="list-style-type: none"><li>a) scale location</li><li>b) scale house</li><li>c) fencing and gates</li><li>d) access roads</li><li>e) paved areas</li></ul> |
| (4) | Location of receiving, processing, reload and storage areas, as applicable, for solid waste, source-separated recyclable materials, recovered materials, waste residuals, exterior stockpiles, hazardous waste, and other materials.  |
| (5) | Identify any exterior stockpile footprints, the type of materials and the maximum height of each exterior material stockpile.   |
| (6) | Identify water sources for fire suppression.  |
| (7) | Designate the load checking areas on the facility site plan.  |
| (8) | Designate the location for the storage of prohibited wastes removed during the load checking process that is separately secured or isolated. Containment areas shall be covered and enclosed and constructed to prevent leaking and contamination   |
| (9) | Designate on-site traffic flow patterns.  |

(10) Identify where the sign(s) will be located on the facility site plan.

Signs must be posted at all public entrances to the facility, and in conformity with local government signage regulations. These signs shall be easily and readily visible, and legible from off-site during all hours and shall contain at least the following information:

- General facility information
  - Name of the facility
  - Address of the facility;
  - Emergency telephone number for the facility;
  - Operating hours during which the facility is open for the receipt of authorized waste;
  - Fees and charges for public customers;
  - Metro's name and telephone number (503) 234-3000; and
  - A list of authorized and prohibited wastes.
- Vehicle / traffic flow information or diagram.
- Covered load requirements.

**ATTACHMENT B: FACILITY DESIGN PLAN AND REPORT**

The applicant shall submit a facility design plan and report that address the following:

(1) Dust, airborne debris and litter.

- a) Submit a proposed design providing a roofed structure enclosed on at least three sides and an impervious surface (e.g. asphalt, concrete) for the tipping floor, storage areas and reloading areas.
- b) Describe control measures to prevent fugitive dust, airborne debris and litter. Describe how the facility design will provide for shrouding and dust prevention for the receiving area, storage area, reload area, and all dry waste processing equipment and all conveyor transfer points where dust is generated.
- c) Describe any additional facility design measures and procedures for the control of dust, windblown materials, airborne debris, litter and for the handling of the waste in the case of major processing facility breakdown.

(2) Facility capacity.

- a) Provide engineering plans, reports and specifications to document that the size and configuration of the facility grounds, building and equipment, including the facility layout, drainage structures, building design, and major facility equipment, processing systems and storage areas are of sufficient capacity to accommodate seasonal throughput of all materials that will be delivered to and generated by the facility.
- b) Provide the estimated capacity (cubic yards) of the facility storage area(s) for incoming solid waste waiting to be reloaded.

(3) Fire prevention.

Submit proof of compliance with local and state fire codes.

(4) Adequate vehicle accommodation.

Provide documentation to demonstrate that adequate on-site area at the facility's entrance, scales, loading and unloading points and exit points shall be provided to allow the number and types of vehicles expected to use the facility during peak times to safely queue off the public roads and right-of-way.

- (5) Water contaminated by solid waste and solid waste leachate.

Submit a DEQ (or equivalent) approved plan with pollution control measures to protect surface and ground waters, including runoff collection and discharge and equipment cleaning and washdown water.

#### **ATTACHMENT C: RELOADING PRACTICES**

Describe how reloading will be conducted at the facility. Attach as many additional pages as necessary to address each of the following:

- (1) A detailed description of how the proposed facility will further recycling or materials recovery processing within the Metro region.
- (2) A detailed description of the methods you will use for measuring and keeping records of incoming solid waste.
- (3) A detailed description of the methods you will use to distinguish loads of incoming source-separated recyclables from other materials.
- (4) A detailed description of how the materials and wastes will be managed and the type of equipment that will be used (from delivery to reload and transport to a processing or disposal facility):
- (5) A detailed description of the methods you will use for measuring and keeping records of materials received, recovered from processing, and solid waste disposed - consistent with Metro's reporting requirements.

#### **ATTACHMENT D: OPERATING PLAN**

The applicant is required to develop and submit an operating plan for review and approval by the Manager of the Metro Solid Waste Regulatory Affairs Division. This section lists the procedures that must be included in the required facility operating plan. A proposed facility operating plan must be submitted with the completed license application subject to any additional elements as required in the license - if one is approved and issued. The operating plan shall describe at a minimum:

- (1) The types of solid wastes to be accepted and handled at the facility.
- (2) A detailed description of how you will distinguish and manage loads of incoming source-separated recyclables from other materials.
- (3) Procedures for inspecting loads. The operating plan shall establish:
  - a) Procedures for inspecting incoming loads for the presence of prohibited or unauthorized wastes.
  - b) A set of objective criteria for accepting and rejecting loads.
  - c) An asbestos testing protocol for all material that appears as if it may contain asbestos.
- (4) Procedures for processing and storage of loads. The operating plan shall establish procedures for:
  - a) Processing of all authorized solid wastes.
  - b) Reloading and transfer of authorized solid wastes.
  - c) Managing stockpiles.
  - d) Storing authorized solid wastes
  - e) Minimizing storage times, and avoiding delay in processing and managing of all authorized solid wastes and recovered materials.

- (5) Procedures for rejecting or managing prohibited wastes. The operating plan shall describe procedures for rejecting, managing reloading and transporting to appropriate facilities or disposal sites any prohibited or unauthorized wastes discovered at the facility. The plan shall include procedures for managing:
- a) Hazardous wastes.
  - b) Other prohibited solid wastes (e.g., putrescible waste, special waste).
  - c) Procedures and methods for notifying generators not to place hazardous wastes or other prohibited wastes in drop boxes or other collection containers destined for the facility.
- (6) Procedures for odor prevention. The operating plan shall establish procedures for preventing all objectionable odors for being detected off the premises of the facility. The plan must include:
- a) A management plan that will be used to monitor and manage all objectionable odors of any derivation including malodorous loads delivered to the facility.
  - b) Procedures for receiving and recording odor complaints, immediately investigating any odor complaints to determine the cause of odor emissions, and remedying promptly any odor problem at the facility.
- (7) Procedures for emergencies. The operating plan shall describe procedures to be followed in case of fire or other emergency.
- (8) Procedures for preventing and controlling nuisances, including noise, vectors, dust, litter, and odors. Include a description of how you will encourage delivery of waste in covered loads.
- (9) Procedures for fire prevention, protection, and control measures used at the facility.

**ATTACHMENT E: INSURANCE**

Include proof of the following types of insurance, covering the applicant, its employees, and agents:

- (1) Broad form comprehensive general liability insurance covering bodily injury and property damage, with automatic coverage for premises, operations, and product liability. The policy must be endorsed with contractual liability coverage.
- (2) Automobile bodily injury and property damage liability insurance.
- (3) Insurance coverage shall be a minimum of \$500,000 per occurrence. If coverage is written with an annual aggregate limit, the aggregate limit shall not be less than \$1,000,000.
- (4) Metro, its elected officials, departments, employees, and agents must be named as ADDITIONAL INSUREDS.

**ATTACHMENT F: LAND USE COMPATIBILITY STATEMENT (LUCS)**

The following information must be provided:

A copy of a completed Metro LUCS or DEQ LUCS. The Metro LUCS is available at [www.oreognmetro.gov](http://www.oreognmetro.gov).

**ATTACHMENT G: DEQ PERMIT APPLICATIONS AND INFORMATION**

The following information must be provided:

A duplicate copy of all applications for necessary DEQ permits and any other information required by or submitted to DEQ, including closure plans, financial assurance for the costs of closure of the facility, and conditional use permit or land use compatibility statement, if applicable.

**ATTACHMENT H: OTHER REQUIRED PERMITS**

The following information must be provided:

A copy of any required federal, state, county, city or other permits, licenses, or franchises that have been granted or issued, not including materials required by Attachment G, or a copy of any applications for such other permits, licenses, or franchises. Copies of correspondence pertaining to such permits, licenses or franchises may be requested.

**ATTACHMENT I: CLOSURE PLAN AND FINANCIAL ASSURANCE**

The following information must be provided

- (1) If a closure plan and financial assurance are required by DEQ, copies of these documents should be included with the application per Attachment G.
- (2) If DEQ does **not** require a closure plan for the facility, attach a closure document describing closure protocol and associated costs. Closure means those activities associated with restoring the site to its condition prior to engaging in the licensable activity. Closure may include, but is not limited to removal of all on-site solid waste stockpiles accumulated after being issued a Metro Solid Waste Facility License. The Closure protocol is the written protocol that specifies the activities required to properly close the facility and cease further solid waste activities.
- (3) If DEQ does **not** require any financial assurance for the costs of closure of the facility, attach proof of financial assurance for the costs of closure of the facility. Cost of closure means the costs associated with restoring the site to its condition prior to engaging in the licensable activity.  
  
These costs may include but are not limited to:
  - a) the cost to load and transport accumulated solid waste stockpiles to an authorized disposal site or recycling facility;
  - b) the cost to "tip" the waste at an authorized landfill or recycling facility; and
  - c) other related costs such as site grading or additional disposal costs associated with restoring the site.

Examples of acceptable forms of financial assurance include, but are not limited to the following: surety bond, irrevocable letter of credit, closure insurance, escrow account.

If the DEQ does not issue a permit or require financial assurance, then the COO may waive the requirement for financial assurance if the applicant provides written documentation demonstrating that the cost to implement the closure plan will be less than \$10,000.

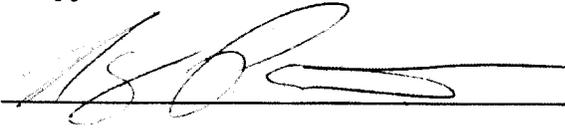
**ATTACHMENT J: PROPERTY USE CONSENT FORM**

If required by Section 6 of Part 1 of this application. Form is available at [www.oregonmetro.gov](http://www.oregonmetro.gov).

**APPLICANT CERTIFICATION:** This form cannot be processed without a signature

*I certify under penalty of law that the information contained in this application is true and correct to the best of my knowledge. I agree to notify Metro within 10 days of any change in the information submitted as a part of this application.*

SIGNATURE OF AUTHORIZED AGENT



TITLE Regional EHS Manager

PRINT NAME Ryan Partridge

DATE 2-26-15

PHONE (602) 272-2400 ext 1004

**Attachment A: Site Plan**

**Attachment B: Facility Design Plan**

February 20, 2015

Warren Johnson  
Solid Waste Compliance Supervisor  
Finance and Regulatory Services  
Metro  
600 NE Grand Av  
Portland, OR 97232-2736

Re: Notification of anticipated change of ownership

Dear Mr. Johnson,

This letter is to provide notice to Metro that Nuverra Environmental Services Inc. of Scottsdale, Arizona entered into a Definitive Sales Agreement with Clean Harbors of Norwell, Massachusetts on February 4<sup>th</sup>, 2015 for the sale of Thermo Fluids Inc. (TFI) to Clean Harbors. This sale is expected to be finalized by the close of the first week of March 2015.

The change in ownership of TFI will not change the operations conducted at the Clackamas facility operated by TFI under Metro License # L-121-11.

Per our discussion, this letter will be provided as an attachment to the renewal application for the above referenced Solid Waste Facility License.

Please feel free to contact me at [greg.hedger@thermofluids.com](mailto:greg.hedger@thermofluids.com) if you have any other concerns. You can also reach me at 602-477-8639.

Respectfully,



Greg Hedger  
Corporate Director  
Environmental, Health and Safety

Attachement:  
Nuverra February 5, 2015 press release

Cc: file



Print Page Close Window

## Press Release

### **Clean Harbors Signs Definitive Agreement with Nuverra to Acquire Thermo Fluids for \$85 Million**

NORWELL, Mass. and SCOTTSDALE, Ariz., Feb. 4, 2015 /PRNewswire/ -- Clean Harbors, Inc. ("Clean Harbors") (NYSE: CLH), the leading provider of environmental, energy and industrial services in North America, and Nuverra Environmental Solutions, Inc. (NYSE: NES) ("Nuverra"), a leading provider of full-cycle environmental solutions to energy end-markets, today announced a definitive agreement has been reached, whereby Clean Harbors will acquire Nuverra's subsidiary Thermo Fluids Inc. (TFI) for \$85 million in an all-cash transaction.



The companies expect to complete the acquisition, which is subject to customary closing conditions, including, but not limited to, regulatory approval, by early March 2015.

Clean Harbors Chairman and Chief Executive Officer Alan S. McKim, said, "TFI is a leading provider of route-based environmental services, which represents an attractive acquisition opportunity that will support both components of our Safety-Kleen business. The addition of TFI's environmental business will perfectly complement our SK Environmental Services business, as well as drive incremental volumes into our hazardous waste disposal facilities.

"Its regionally focused business model has enabled TFI to achieve both operating scale and route density in the markets it serves," added Mr. McKim. "At the same time, as one of the largest collectors of used motor oil in the western U.S., TFI will add approximately 50 million gallons of waste oil to Safety-Kleen's recycling and re-refining business. We expect to effectively leverage its highly scalable platform of collection facilities, storage capabilities, rail assets and transportation fleet with our existing re-refining infrastructure."

Mark D. Johnsrud, Nuverra's Chairman and Chief Executive Officer, stated, "Our strategy has been to focus on our core shale environmental solutions business, and this transaction is consistent with that

approach. We are pleased to monetize our TFI business to provide further support to that strategy. As the leading environmental and industrial services company in North America, Clean Harbors will be an excellent steward for TFI going forward."

Based in Scottsdale, AZ, TFI provides environmental services in 21 U.S. states through a network of 36 permitted facilities. The company operates a well-maintained fleet of trucks and rail cars in servicing more than 20,000 customers. TFI's range of environmental services includes used oil recycling, used oil filter recycling, antifreeze products, parts washers and solvent recycling. Its industrial waste management services include vacuum services, remediation, lab pack and hazardous waste management.

#### **About Clean Harbors**

Clean Harbors (NYSE: CLH) is North America's leading provider of environmental, energy and industrial services. The Company serves a diverse customer base, including a majority of the Fortune 500, across the chemical, energy, manufacturing and additional markets, as well as numerous government agencies. These customers rely on Clean Harbors to deliver a broad range of services, such as end-to-end hazardous waste management, emergency spill response, industrial cleaning and maintenance, and recycling services. Through its Safety-Kleen subsidiary, Clean Harbors also is North America's largest recycler and re-refiner of used oil and a leading provider of parts washers and environmental services to commercial, industrial and automotive customers. Founded in 1980 and based in Massachusetts, Clean Harbors operates throughout the United States, Canada, Mexico and Puerto Rico. For more information, visit [www.cleanharbors.com](http://www.cleanharbors.com).

#### **About Nuverra**

Nuverra Environmental Solutions is among the largest companies in the United States dedicated to providing comprehensive and full-cycle environmental solutions to customers in energy and industrial end-markets. Nuverra focuses on the delivery, collection, treatment, recycling, and disposal of restricted solids, water, wastewater, used motor oil, spent antifreeze, waste fluids and hydrocarbons. Nuverra continues to expand its suite of environmentally compliant and sustainable solutions to customers who demand stricter environmental compliance and accountability from their service providers. Interested parties can access additional information about Nuverra on its web site at <http://www.nuverra.com>, and in documents filed with the United States Securities and Exchange Commission, on the SEC's web site at <http://www.sec.gov>.

#### **Safe Harbor Statement**

Any statements contained herein that are not historical facts are forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995. These forward-looking statements are generally identifiable by use of the words "believes," "expects," "intends," "anticipates," "plans to," "estimates," "projects," or similar expressions. Such statements may include, but are not limited to, statements about Clean Harbors' planned acquisition of Thermo Fluids Inc. and Nuverra's planned divestiture of Thermo Fluids Inc., and other statements that are not historical facts. Such statements are based upon the beliefs and expectations of Clean Harbors' or Nuverra's management as of this date only and are subject to certain risks and uncertainties that could cause actual results to differ materially, including, without limitation, those items identified as "risk factors" in Clean Harbors' or Nuverra's most recently filed Form 10-K and Form 10-Q. Therefore, readers are cautioned not to place undue reliance on these forward-looking statements. Neither Clean Harbors nor Nuverra undertakes any obligation to revise or publicly release the results of any revision to these forward-looking statements other than through its filings with the Securities and Exchange Commission, which may be viewed in the "Investors" section of Clean Harbors' website at [www.cleanharbors.com](http://www.cleanharbors.com) and in the "Investors" section of the Nuverra website at [www.nuverra.com](http://www.nuverra.com).

#### **Contacts:**

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Clean Harbors, Inc.

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Buckley.James@cleanharbors.com

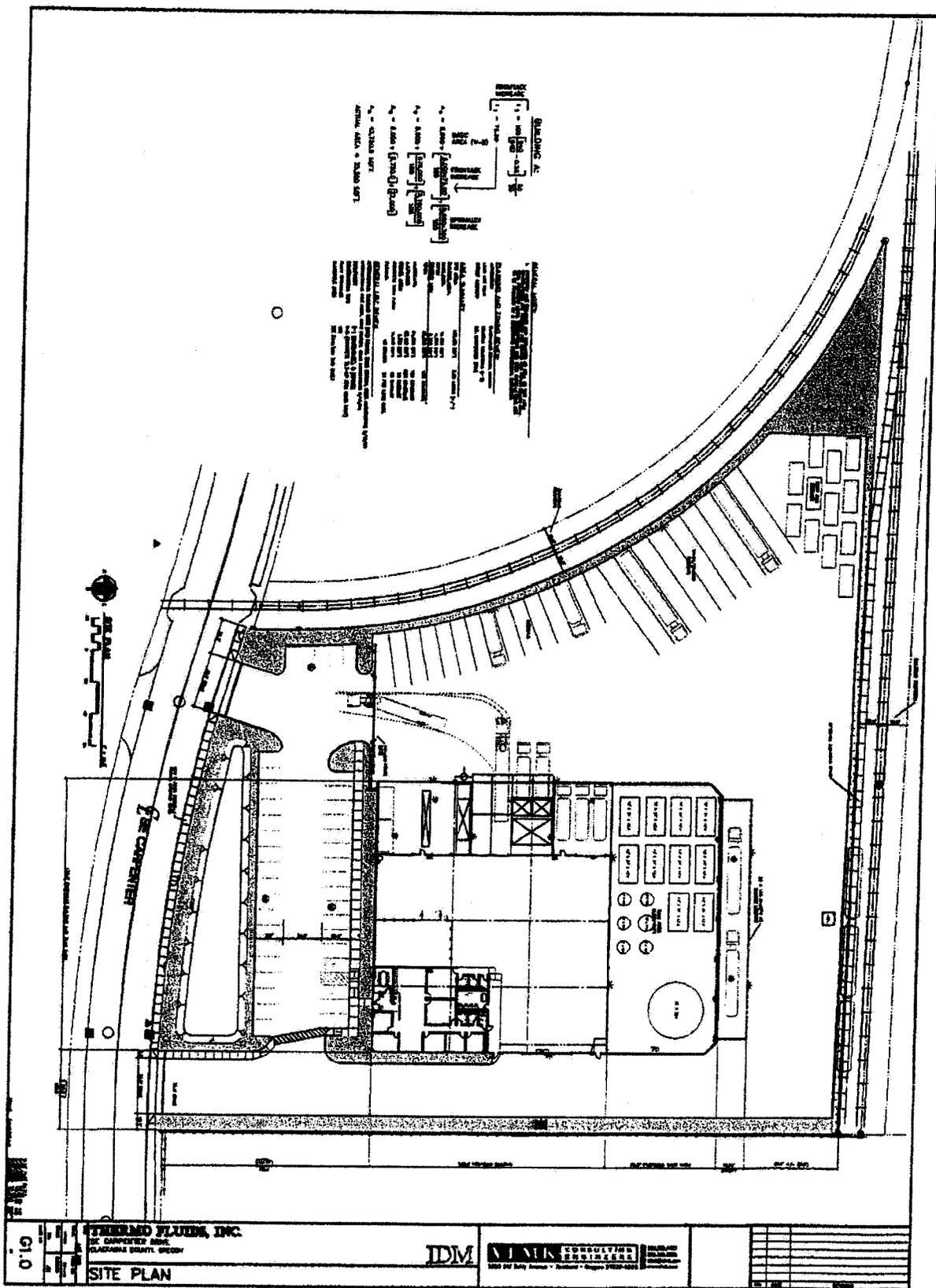
Liz Merritt  
VP Investor Relations  
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Logo - <http://photos.prnewswire.com/prnh/20150204/173381>LOGO

To view the original version on PR Newswire, visit: <http://www.prnewswire.com/news-releases/clean-harbors-signs-definitive-agreement-with-nuverra-to-acquire-thermo-fluids-for-85-million-300030561.html>

SOURCE Nuverra Environmental Solutions, Inc.

EXHIBIT A



SITE PLAN

**EXHIBIT "B"**

**LEGAL DESCRIPTION**

Lot 1, Block 1, SOUTHERN PACIFIC CLACKAMAS INDUSTRIAL PARK, in the  
County of Clackamas, State of Oregon.

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21- LEASE

Doc. #475496 v.4



*Exhibit C-1*

**STANDARD BUILDING SPECIFICATIONS**

**THERMO FLUIDS, INC.**

Southeast Carpenter Drive  
Clackamas County, Oregon

August 3, 2005

◆ **OVERVIEW**

Description:           Approx. 18,750 s.f. freestanding concrete tilt-up building with a 6,750 s.f. Covered Area, 3,000 s.f. canopy at the Tanker Loading area, and an 11,900 s.f. Tank Farm. The clear height is 24'.

◆ **GENERAL REQUIREMENTS**

Includes materials, labor, insurance, and supervision for the construction of the Thermo Fluids facility.

The cost of the building permits, systems development fees, water meters, architecture, engineering, soils reports, testing, sales tax, etc. are by others.

Includes parking for 40 cars.

Construction will be under the direction of Perlo McCormack Pacific's Project Manager and full time on-site Superintendent.

Temporary water, sewer, and electrical service will be the responsibility of the General Contractor until the Temporary Certificate of Occupancy (less punch list items) is received.

At the conclusion of the project, one (1) set of "record" drawings shall be provided to Thermo Fluids.

Compliance with applicable ADA and OSHA construction codes is included.

A handwritten signature in black ink is written over a circular stamp. The stamp contains the word "INITIAL" in a circular arrangement around a central point.

◆ **SITE WORK**

A final, site-specific soils report must be obtained by others from a qualified local geotechnical engineer. The report will comprise a complete site analysis, including recommendations for structural foundation systems, building pad preparation, subgrade and paving designs. We have included our assumptions for these work items at this time and will modify these budgets once the design is complete.

All existing vegetation will be removed from the construction area.

Soil erosion and sediment control will be provided to the satisfaction of local government authorities.

Parking areas and roadway entrances and exits will be drained as required.

The storm drainage system will be sized to accommodate exterior roof drains.

Storm water drain design will meet all local codes and ordinances.

There will be cast in place concrete curbs at high traffic areas and extruded concrete curbs at all other paved areas.

Chain link fencing will be provided around the site perimeter with (2) 15' swing gates and (1) rolling gate. All gates will be manually operated.

**Paving**

Concrete paving for the Loading Dock shall be 6" thick reinforced or 7" thick unreinforced, 3,000 psi with a 6" gravel base over native soil.

The Tank Farm includes a 12" thick reinforced concrete slab on a 6" gravel base with two mats of rebar. An alternate exists to increase the thickness of a 50'x50' area to 24" thick on 10" of base rock.

The main drives and truck yards shall be 3-1/2" thick asphalt with a 6" gravel base over 12" of 5% cement-treated soil.

All auto parking areas shall be 2.5" thick asphalt with a 4" gravel base over 12" of 5% cement-treated soil.

Striping shall be provided for the car parking areas.

All sidewalks shall be 5' wide (or wider if required by code), 4" thick, 3,000 psi and broom finished.

*MS*  


Concrete paving (including the Tank Farm) will be broom finished and pitched for drainage to catch basins.

**Landscaping**

Seeding, landscaping, and irrigation to meet County standards.

**Site Utilities**

A 6" underground water service will be provided for building fire protection and a 2" underground water service with a 1-1/2" meter (water meter costs and fees by developer) will be provided for domestic use in compliance with local codes and building requirements.

Sanitary sewer system shall be provided and sized to meet building requirements and in compliance with local codes and building requirements. A site sanitary line runs the length of the building under the dock and tanker canopy.

Electric and natural gas service shall be provided and sized to meet building requirements (see electrical).

Two (4) inch conduits shall be provided for telephone service with conduits stubbed into the electrical room or where the electrical gear is located (Thermo Fluids to be responsible for phone service).

One (1) oil/water separator has been included for the sanitary sewer.

◆ **BUILDING**

**Excavation, Backfilling, and Grading**

All cut, fill, and fine grading shall be included.

Fill under the building shall be as specified by a geotechnical engineer and tested as directed by a geotechnical engineer.

Any area not covered by the building or site work shall be stabilized and graded for proper drainage and maintenance.

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**Foundations**

Reinforced concrete foundations shall be used. The foundations shall be properly engineered with suitable steel reinforcing for the loads imposed by the structure and its attendant live, wind, dead, and other loads.

Concrete used in foundations shall attain 2,500 psi compressive strength in 28 days.

Interior building columns shall be supported by steel reinforced concrete pad footings.

Concrete pads shall be provided for all egress doors, unless they open directly onto a paved surface.

**Floor Slab**

The warehouse floor slab shall be constructed in accordance with geotechnical and structural engineers' recommendations. The floor slab shall be 6" thick, 3,500-psi reinforced concrete over 6" of crushed rock.

A floor flatness rating of 35 will be achieved as measured by the FACE Floor Flatness Profile Number System for all warehouse areas. This system provides analytical guidelines for floor surface definition and control. The system evaluates floor curvature (waviness, flatness) and inclination (tilt or levelness).

The warehouse floor shall be cleaned and scrubbed prior to tenant occupancy.

Placement of concrete shall be completed utilizing a hydraulic power driven laser screed or a roller screed.

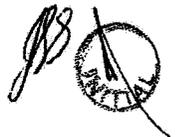
Slab control joints shall be sawcut at the optimum time to reduce cracking. The maximum distance between sawcut control joints should be 25' x 25' or as recommended by the structural engineer.

Slab cold construction joints shall be doweled with 5/8" x 1'-0" smooth bars at 24" on center.

All columns shall have a formed diamond block out that will be poured separately.

No keyways of any type shall be allowed in the floor slab.

All concrete mix designs shall be reviewed and approved by a structural engineer prior to concrete placement.

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**Exterior Walls**

The exterior walls of the warehouse shall be of concrete tilt wall construction in accordance with local codes.

Overhead door openings shall have cast-in steel channel frames up 4' each side.

**Structure**

The roof structure shall consist of structural steel joist girders and bar joist with 2 x 6 subpurlins and OSB decking supported by steel on the interior bay and load bearing steel columns. Column spacing shall be approximately 50' x 42'.

All structural steel will have one coat of shop applied gray primer paint.

**Metals**

Lintels, sill angles, roof frames and other miscellaneous metals shall be provided and primed to match the structural steel.

One (1) roof access ladder will be provided for the building.

**Roofing**

The roof shall be a built-up roof consisting of a base sheet, 2 ply's and cap sheet (4-ply built up roof).

The roof's insulation value shall be R-19 (white vinyl faced batt insulation attached to the underside of the subpurlins below the roof deck).

The roofing systems shall consist of components manufactured by the same manufacturer and shall be designed to be free of leaks and installed to prohibit standing water at any location.

The roof shall be drained by exterior sheet metal downspouts.

Any roof curbing and penetrations shall be coordinated with the roof system and installed per the manufacturer's recommendations.

Skylights and/or smoke vents have not been included at this time.

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**Glass and Glazing**

Fixed glass at the office areas shall be U.S. Aluminum Products or equal, as indicated on the plans. All mullions shall be mill finished to match the entrance work.

The aluminum entrances shall be 1" insulated glass, tempered where required and meeting local codes. The aluminum doors will be narrow stile, with closer, aluminum threshold, weather stripping and finished to match frame members.

Exterior office windows shall have mini blinds installed.

**Doors, Frames and Hardware & Louvers**

Four (4) hollow metal doors are included in the building perimeter walls. The frames and doors shall be consistent in manufacturer and design to provide a continuous appearance.

Two (2) 8'-6" x 9', 24 gauge, vertical, insulated, sectional panel, manually operated overhead doors in the building exterior walls at the loading dock.

Four (4) 12' x 14', 24 gauge, vertical, insulated, sectional panel, high-lift, manually operated overhead doors in the building exterior walls.

One (1) 18' x 14' 24 gauge, vertical, insulated, sectional panel, highlift, manually operated overhead door in the building exterior wall.

**Warehouse Improvements**

The warehouse floor joints will be cleaned and caulked with a semi-rigid epoxy, such as MM-80.

Approx. 80 l.f. of 8' high chain link fencing has been included in the warehouse for the Storage Area with (3) swing gates.

**Painting**

Metal structural members shall receive one coat of prime paint only.

The building exterior to receive elastomeric paint to cover and provide attractive exterior appearance with minimal maintenance. The interior faces of the warehouse walls are not painted.

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Office wall areas shall be painted with sufficient coats to give an attractive appearance. Color to be determined in conjunction with Thermo Fluids.

Page 7

Auto striping shall be a minimum of 4" wide, approximately 18' long and approximately 9' on center and in compliance with local codes.

The interior of the concrete walls are not painted.

#### Fire Protection

A design-build wet sprinkler system shall be installed in the warehouse and offices in compliance with local code. Density of fire protection shall be for ordinary office & warehouse use.

A design-build dry sprinkler system has been included for the exterior canopies.

Fire hydrants will be installed to City requirements.

#### Dock Equipment

Two (2) manually operated edge-of-dock levelers (20,000 lb capacity) have been included at the loading dock doors with a pair of laminated dock bumpers.

#### Electrical

The electrical service shall meet all applicable codes and regulations.

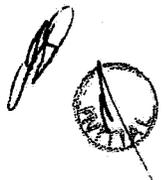
An 1,000 amp, 277/480 volt, three phase, four-wire service shall be provided to Thermo Fluids by the developer. Power shall be metered through a transformer located outside of the building adjacent to the electrical gear. Additional power requirements for tenant equipment are the responsibility of Thermo Fluids.

A 100-amp house panel will be provided at the electrical room for exterior lights.

A 200-amp panel will be provided for the office.

The main electrical control panels shall be located in the warehouse.

A basic fire alarm system will be furnished. Excludes horns, strobes, or other requirements related to tenant's racking or equipment layout.

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Each office will have two (2) duplex plugs and one (1) telephone/data outlet.

We have not included an allowance for warehouse power/distribution and equipment connections.

Page 8

### Lighting

Exterior lighting shall be provided for outside areas by use of wall mounted 400 watt, metal halide fixtures.

All site lighting shall be activated by light sensitive photocells and deactivated by a timer.

Provide warehouse lighting using 400-watt metal halide high bay fixtures. Provide 25 foot-candle lighting at the warehouse and Storage area. Lighting is based on an open warehouse at a height of 30" above the floor, before racking and tenant equipment is in place.

Office lighting will be provided with overhead fluorescent fixtures to typical office lighting levels as allowed by code.

Site light poles have not been included at this time.

### Plumbing

All plumbing systems and their component parts shall be installed in accordance with applicable local codes.

Underground sanitary sewer and overhead water piping have been included to accommodate the office. No sewer or water lines have been provided for warehouse areas.

Air-lines or compressors are not included.

### Heating Ventilation and Air Conditioning

Freeze protection heating only will be furnished at 15 BTU's per square foot of floor area in the warehouse as allowed by code.

HVAC in the offices to provide; 1) up to 15 degrees of cooling below the outside temperature (but in no case below 70 degrees); and 2) heating to maintain at least 68 degrees when the outside temperature is at least 20 degrees.

### Office

*JP*  


An allowance of \$35/s.f. for approx. 4,000 square feet of office with standard office finishes are included for the main office area.

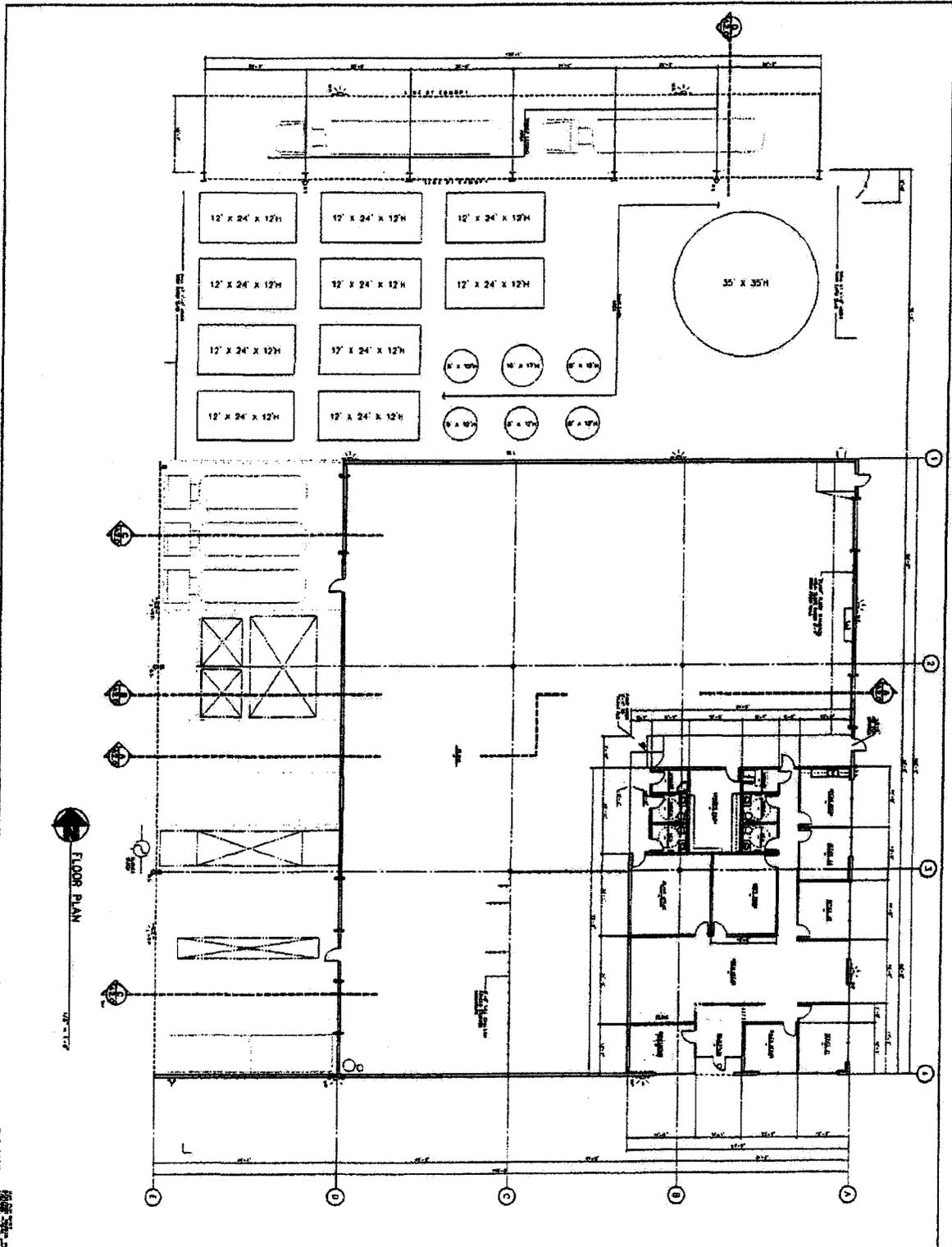
Page 9

**Exclusions - General**

- Phone, data, computer or security cabling and equipment
- Appliances such as refrigerators, dishwashers, vending machines, etc.
- Air compressor and air piping
- Sanitary or water lines to service warehouse
- Electrical room
- Site light poles
- Increase slab thickness for Tank Farm
- Emergency Generator
- Smoke vents and/or skylights
- Paint interior warehouse walls
- All furnishings and equipment
- Warehouse heating or cooling (other than freeze protection)
- Racks and bins of any kind
- Horns, strobes, in rack fire sprinklers and other fire protection devices related to Thermo Fluids' racking or manufacturing layout, if required.
- Trash compactor
- Building and monument signage
- Special floor finishes (i.e. floor hardeners)

*AB*  


EXHIBIT C-2

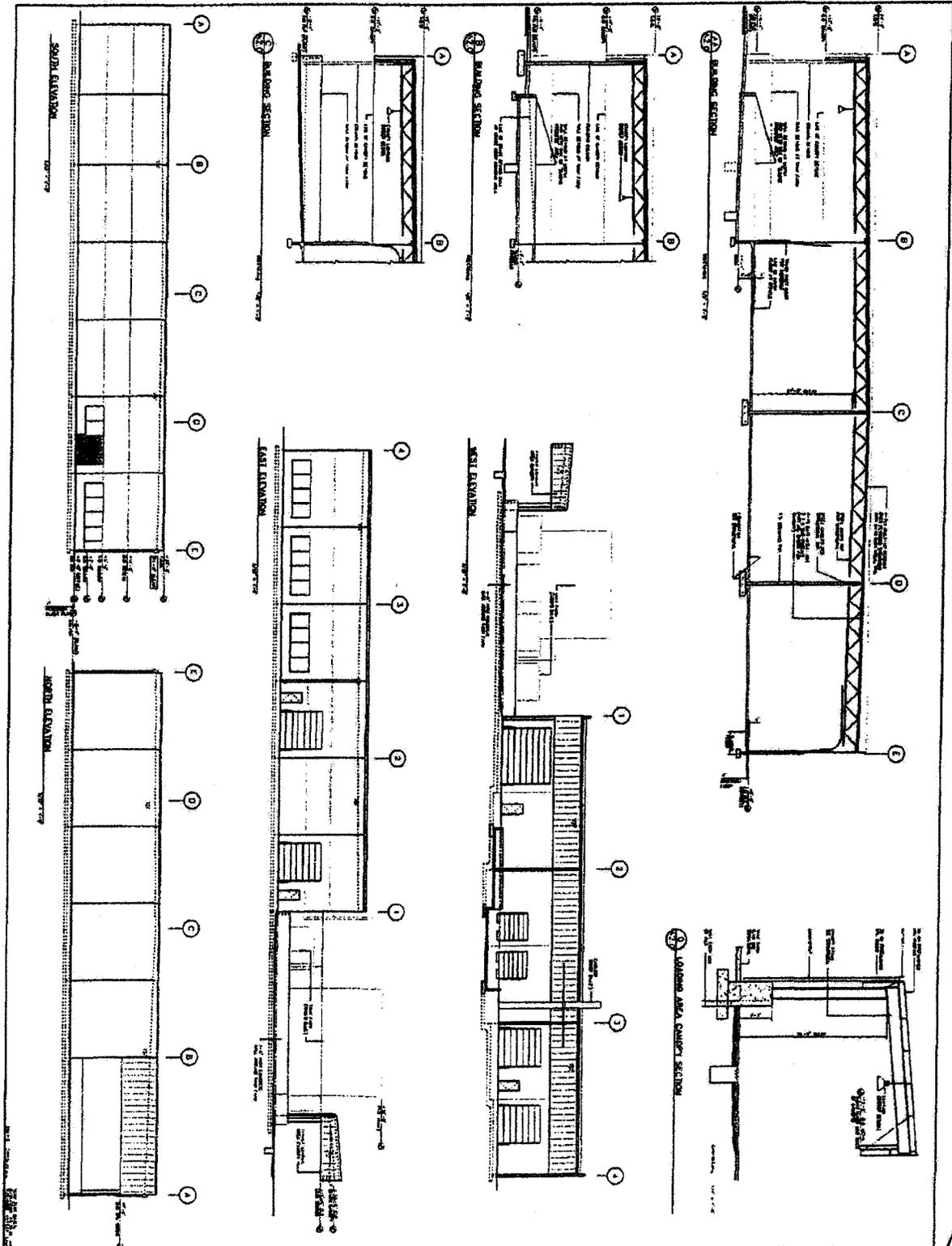


FLOOR PLAN

A1.0	THERMO FLUIDS, INC. 52 CARPENTERS DRIVE GLACIERS CORP. DR. OREGON		JDM	NUNN CONSULTING ENGINEERS 2023 SW 6th Avenue - Portland - Oregon 97204-4215	<table border="1"> <tr> <td>NO.</td> <td>DATE</td> <td>DESCRIPTION</td> </tr> <tr> <td> </td> <td> </td> <td> </td> </tr> </table>	NO.	DATE	DESCRIPTION												
	NO.	DATE				DESCRIPTION														
FLOOR PLAN																				

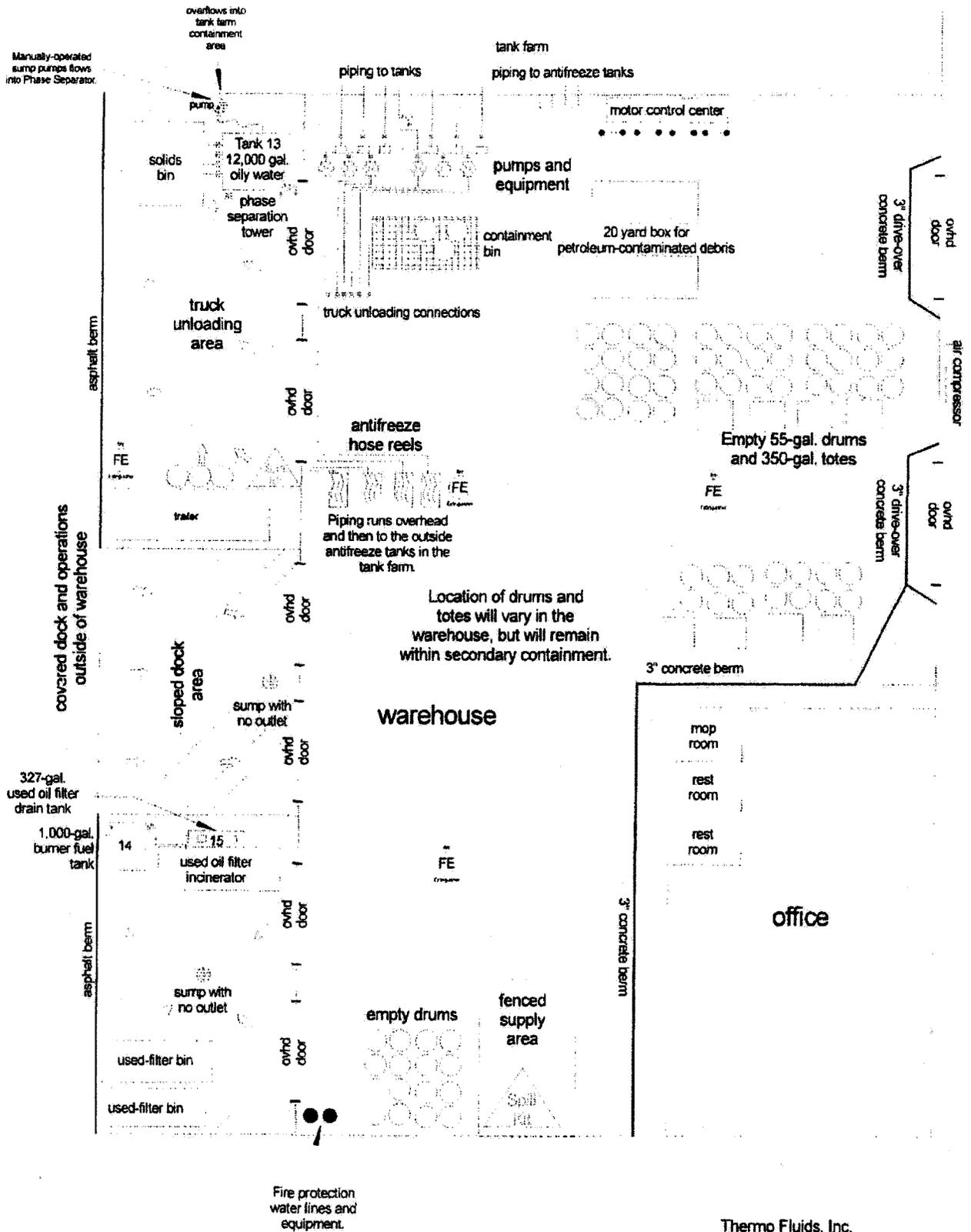


EXHIBIT C-3



ELEVATION PLAN

<p>A2.0</p>	<p><b>THERMO FLUIDS, INC.</b>          100 CARPENTER DRIVE          GLADDAISE COUNTY, OHIO</p>	<p><b>IDM</b></p>	<p><b>WALKER CONSULTING ENGINEERS</b>          1000 W. 12th Street • Columbus, OH 43260-1200          Phone: 614-291-1200</p>	
<p>EXTERIOR ELEVATIONS</p>				



Thermo Fluids, Inc.  
Clackamas, OR  
SPCC Warehouse Layout

N

not to scale March 2014

Approx. Drainage Direction:

### **Attachment C: Reloading Practices**

The facility will receive approved solid wastes under the Metro Solid Waste licenses from local pickups from various customers around the greater Portland area, and from various Thermo Fluids (TFI) Locations within the North West Region. This includes materials from Oregon, Washington, and parts of Idaho.

Prior to pick up each material will be certified by the generator and tested per TFI Material Acceptance Protocol requirements to ensure that the waste stream does not present any hazardous characteristics. Once approved by the Corporate EHS team the material will be dispatched for pick up by a TFI driver. Upon receipt of the material a copy of the approved profile will be provided with each drum of waste and attached with the shipping papers. The material is then emptied from the drum into an open top roll off box that is stored in a contained, covered area. When the drum is consolidated into the roll off box the profile is attached to the box and documented to ensure that each material collected can be accounted for. This information can also be pulled through our "Dispatch Reporting System."

Once an open top is full of consolidated approved material for disposal the waste is transported to Wasco Landfill in Arlington, OR where it is disposed of. The amount disposed of is tracked using weight tickets provided at the landfill.

The waste that is disposed of under the Metro Solid Waste permit is not further processed nor recovered for other use.

#### **Attachment D: Operating Plan**

The wastes that are accepted for landfill disposal through the Metro Solid Waste permit are Oily Debris/Absorbent, Petroleum Contaminated Soils, and used or off-spec Grease. These waste streams are not separated and further processed on-site at TFI. In rare instances the waste will be sent out for waste to energy recovery, based on customer request. All waste streams are approved through the TFI Material Acceptance Protocol. Any waste that is not approved or rejected must be managed by an appropriate 3<sup>rd</sup> party disposal outlet and will not be managed under the Metro Solid Waste Permit.

Upon receiving a load the drivers and on-site personnel are responsible for inspecting the drums to ensure they are free of any damages that may impact the integrity during handling and transport. Next a visual inspection shall be conducted to ensure the waste is the correct waste the driver has been dispatched to pick up. This can also be done through generator knowledge at time of pick up.

Once the driver returns to the facility with the waste it is staged in the appropriate area where a facility operator will inspect the material by opening the drum and place it in the appropriate open top container. The paperwork that was attached with the drum will be placed in a folder than on the open top indicating the approved profiled number associated with the waste placed in that container. This profile number will also indicate the name of the generator and type of waste the material is.

Once the open top is full and ready for transport the driver will secure the load accordingly and transport the waste to the Wasco Landfill in Arlington, OR. From there the waste will be approved, weighed, and disposed of.

In order to prevent odor complaints during staging and storage all containers are kept in a contained, closed environment that is not exposed to any outside elements. The waste streams are screened prior to pick up to ensure they only contain materials that are approved and appropriate for TFI disposal under the provisions of the Metro Solid Waste Permit.

*\*\*Please see the attached Emergency Action plan for procedures to take in the event of an emergency.*



**Thermo Fluids, Inc.**  
**12533 SE Carpenter Drive**  
**Clackamas, OR 97015**  
**503.788.4612**

# **EMERGENCY ACTION PLAN**

## **POLICY STATEMENT**

Our employees are our most valuable assets. In the event of an emergency, it is our policy to be prepared to protect the safety and health of all. This plan was established to systematically combat foreseen emergencies, and is updated annually or as changes occurs. In the event of any emergency, your first concern should always be to protect the safety of yourself and those around you. All employees are expected to know and follow the procedures outlined in this plan.

Questions or comments regarding this plan should be directed to your Area Manager, Regional Manager, or Regional EHS Manager.

Last Updated: 10/25/2013

## **TFI – Clackamas EMERGENCY ACTION PLAN**

This Emergency Action Plan documents proper procedures to follow during emergency situations occurring both at the facility and off-site. It is designed to protect employees, contractors, visitors, company property, and the general public. It also ensures that appropriate federal, state, and local agencies are notified, and that all regulatory reporting requirements are met. All employees have access to this plan, and it will remain posted in a conspicuous area on the facility for reference. The **Site Commander** is responsible for ensuring that this plan is reviewed and updated annually, or as needed. Procedures reviews for each type of emergency are conducted on an ongoing basis to ensure employee understanding of proper procedures. **It is the responsibility of all employees, visitors, and contractors to become familiar with this plan, and act accordingly in the event of an emergency.**

### **RESPONSIBILITIES**

The **Site Commander** has total authority for the administration and coordination of all activities throughout the facility to cope with any emergency situation. The Site Commander will determine the appropriate outside agencies to contact, handle any media inquiries, and assist with evacuation measures, The Site Commander will ensure that all reporting requirements are complied with following an emergency. It is the responsibility of the Site Commander to communicate in writing the outcome of any emergency to all local employees. This communication will include any corrective measures that have been put in place, and may require that additional training techniques be provided.

It is the responsibility of all **employees, contractors, and guests** to immediately report any emergency situation to the supervisor or manager on duty, and to follow all instructions given during an emergency. Employees are required to provide all information regarding an emergency situation, including recommendations to prevent future occurrences, to the Site Commander.

### **EMERGENCY EQUIPMENT**

Emergency equipment items, such as fire extinguishers, First Aid Cabinets, eye wash stations are located throughout the facility.

### **EMERGENCY RESPONSE (Potentially Life Threatening Injuries)**

TFI-Clackamas will call 911 to alert first responders if an injury or an accident takes place requiring immediate medical attention. Any witnesses of the accident who choose to render aid that is not certified to do so will be acting as a "Good Samaritan". If the person responding as a "Good Samaritan" accidentally comes in contact with human blood or body fluids they will have to adhere to the following process;

- Assume universal precautions that treat all human blood and certain body fluids as if they are infectious for HIV, Hepatitis B Virus, and other blood pathogens.
- Report blood contact to First Aid responders from the City of Clackamas.

The purpose of this communication is to establish a program and a procedure for protection from blood borne pathogens. This program supports compliance with the OSHA 29 CFR 1910.1030 Blood borne Pathogens. This plan applies to all company employees.

**Should Search and Rescue procedures be required, they will be conducted by the appropriate local agencies, not TFI employees.**

### **EVACUATION COMMUNICATIONS**

If it becomes necessary to evacuate the facility the individual who is first made aware of the emergency will pull the fire alarm located throughout the facility. The alarms will notify all personnel on-site to discontinue all activities and evacuate the premise immediately to the designated assemble area near the entry to the site. Communication to off-site employees during evacuation or other emergencies will be communicated via cell phone. The Site Manager or designee will be responsible for placing the call to any off site employee not to return to the facility if deemed necessary. The off site employee will remain in the trade until an all clear communication is given and returning to the site has been directed. If

returning to the facility is not possible the Site Commander will make arrangements for off site parking of Company vehicle(s).

### **EVACUATION PROCEDURES**

In the event of an emergency, employees, contractors, and visitors should evacuate the facility in an orderly fashion, by way of the nearest and safest exit route, and proceed to the designated assembly area. The Site Maps indicate evacuation paths general evacuation paths for each work area are noted on evacuation site maps found posted throughout the facility.

### **ROLL CALL**

Roll call will be conducted by the local designated Site Commander. Everyone is to remain at the assigned assembly area until a verbal "all clear" has been sounded instructing everyone to resume pre-emergency activities. The primary method of communication during evacuations will be verbally. The roll call will be documented.

Verbal communication will be the primary method of communication during evacuations. The roll call will be recorded on the designated TFI-Emergency Evacuation form to include the names of visitors and contractors. TFI Host of visitor is accountable during an evacuation for their guest(s) to arrive at the assembly area.

### **EVACUATION MEETING POINT**

In the event of a fire or other emergency that requires evacuation from the TFI-Clackamas facility the main evacuation meeting point is in the front main parking lot near the grassy area by the drainage ditch.

### **ALTERNATIVE EVACUATION MEETING POINT**

In the event the wind direction blows chemical, spill fumes, or smoke from a fire to an evacuation assembly point. The evacuation leader will instruct and lead employees to an alternative evacuation assembly point. Employees do not need to wait for instruction to go to an alternative site. The alternative meeting point is west of the facility at the corner of SE 120<sup>th</sup> St and SE Carpenter Drive.

### **ENVIRONMENTAL RELEASES**

It is the policy of this facility to involve the appropriate local agencies in the event of a major environmental spill, leak, or chemical release. Large spills may require special training, equipment, and specific clean-up efforts may require assistance from outside authorities. For minor events that may be handled by on-site personnel it is important to coordinate the following steps when necessary.

- 1) Notify Site Commander or designee. Describe the situation and request that they bring emergency items as required, such as spill dikes, floor dry materials, rubber gloves / protective clothing, ropes or tape to block off area, and warning signs.
- 2) Perform evacuation procedures. (If necessary)
- 3) Isolate spill / leak area using rope or tape. Notify all personnel not involved in the clean-up efforts that the area is off-limit until further notice.
- 4) If First Aid assistance is required, only certified personnel should administer aid.
- 5) Notify **Oregon Department of Environmental Quality – 503-229-5696** of the emergency. Notification must be made with immediately but no later than 24 hours after first being notified or made aware an environmental release has occurred. When contacting **Oregon Department of Environmental Quality** utilize form found on **Page 6** of this document.
- 6) Contain the flow of the material with spill dikes and floor dry materials.
- 7) Ensure that clean-up and disposal instructions are followed, and that the proper safety equipment is used. Inspect the area to ensure it is risk-free before allowing employees to return.
- 8) Ensure that the event is communicated to the Regional EHS Manager and Regional Manager.

### **FIRES/EXPLOSIONS**

The extent and type of event will determine whether on-site trained personnel can contain the situation, but appropriate authorities should always be notified. The following steps should be performed whenever necessary.

- 1) Notify the Site Commander and the **Clackamas Fire Department - 911**.
- 2) Perform evacuation procedures.
- 3) If the event appears containable, a trained employee will use a Class ABC fire extinguisher, and will use the proper protective equipment while putting out the fire. Notify the user of any special fire-fighting procedures.
- 4) Isolate area using rope or tape and post warning signs. Notify all personnel that the area is off-limit until further notice.
- 5) If First Aid assistance is required, only certified personnel should administer aid.
- 6) Ensure that the event is communicated to the Regional EHS Manager and Regional Manager.

### **OFF-SITE EMERGENCIES**

A large portion of our workforce performs duties off-site, using company equipment and vehicles. Examples of potential off-site emergencies include fuel spills and vehicle fires, accidents, violence in the trade, and unusual weather / road conditions. Always contact your supervisor / manager **immediately** with details of your emergency. Depending upon the type of emergency and the severity of the situation, they will provide you with instructions. They are also responsible for notifying the Site Commander and the appropriate local agencies. The Site Commander will ensure that all required reports are filed.

Employees are advised to exercise personal judgment when dealing with each type of emergency, but the minimum procedures to follow are listed below. **As a reminder, employees are instructed that they are not authorized to communicate any details to media personnel or the general public. Headquarters Human Resource must be contacted prior to any public statement being made.**

#### **1) Vehicle Accidents**

- a. Stop/park the vehicle immediately, taking all necessary precautions to prevent further accidents. Turn off ignition and power sources, activate parking brakes, warning lights, place the warning triangles out, etc.
- b. Contact your supervisor and the police to report your accident.
- c. Locate witnesses and collect names and phone numbers. Provide driver, company, insurance and vehicle information to the police and other driver(s). Do not make any statements about the accident to anyone other than a company representative or the police.

#### **2) Violence in the Trade**

- a. Per TFI policy, all employees are expected to **recognize and report** violence, threatening situations, security breaches, etc. to their supervisor. This includes all incidents that are witnessed, experienced, or learned.

#### **3) Fuel Spills**

- a. Stop/park the vehicle immediately, taking all necessary precautions to avoid creating an accident. Park vehicle in a secure, relatively flat area, if possible. Do not park near bodies of water or drain grates. Turn off ignition and power sources; activate parking brakes, warning lights, etc.
- b. All fuel spills, regardless of the amount, must be reported to your supervisor
- c. General precautions must be taken to contain the spill, if it is safe to do so. Isolate the spill/leak area with ropes, cones or other barriers. Contain the spill with a Vehicle Spill Kit.

**4) Vehicle Fire**

- a. A Class ABC fire extinguisher may be used in an attempt to put out small fires. If the fire is clearly out of control, or your safety is threatened, move away from the area to a secure spot.
- b. Immediately contact the **Local Fire Department – 911**, and your supervisor.

**5) Severe Weather**

- a. In the event of severe thunderstorms, lightning, street flooding, monsoon winds, etc., immediately stop your vehicle in a safe area. Contact Road Conditions Report **Department of Transportation at 1-888- 411-7623**. For local weather forecasts contact the **National Weather Service at (505) 243-0702**.
- b. Keep your radio on for emergency reports.
- c. **Tornado Safety** – Abandon the vehicle and seek refuge in a basement, storm shelter or sturdy building. As a last resort, seek shelter in a culvert or ditch. Care should be taken to seek protection from flying debris. Avoid highway overpasses, they are not safe.
- d. **Flood Safety** – *Do not drive through flooded areas*. Even if it looks shallow do not attempt to drive through low water crossings or flooded areas. Roadways concealed by water may not be intact.
- e. **Earthquake Safety** - In the event of an earthquake take cover underneath a desk or table away from windows and objects that could fall on you. Stay there and do not attempt to run outside as falling debris may cause injury. If outdoors stay in an open area. After the earthquake has ended be prepared for **AFTERSHOCKS**, give first aid to victims in need, and **DO NOT MOVE INJURED VICTIMS UNLESS ABSOLUTELY NECESSARY**. Contact emergency personnel and/or supervisors if able to do so safely, and be prepared to evacuate if necessary.

**CRISIS MANAGEMENT**

Additionally, emergencies that pose potential risk to the public must be reported. Direct telephone numbers for dedicated personnel are included on the **Emergency Contact Telephone List** which can be found on **Page 9** of this document. The Site Commander will ensure that all required reports are filed.

**1) BOMB THREATS**

In the event of a bomb threat, the Site Commander and the Clackamas Police Department must be notified immediately, and evacuation procedures initiated. All employees, contractors, and visitors are required to follow the emergency instructions issued by the local authorities. The Site Commander will ensure that all required reports are filed. See **page 9** of this document.

**2) SUSPICIOUS PACKAGES, MAIL, ETC**

In the event a suspicious package, mail, or other item shows up at the facility avoid handling the package and isolate the package in a secure area. Contact the local law enforcement. If the package has been opened, or appears to be a suspicious device do not handle any further. Keep everyone away until police arrive. Refer to “Letter and Parcel Bomb Recognition” which can be found on **page 7** of this document.

**3) THREAT BY TELEPHONE**

In the event you receive a threatening telephone call:

- a. During the Call:
  - i) **DO NOT HANG UP**
  - ii) Stay as calm as possible
  - iii) Attempt to find out why the caller is upset, reason for the threat
  - iv) Try to get as much information as possible about the threat and motive. Refer to Bomb/Other Threats Checklist” which can be found on **page 8** of this document.
  - v) Notify Police or local law enforcement
- b. After the call:

- i) Write down everything that was said including the exact threat made.
- ii) Notify your manager/supervisor in reference to the threat
- iii) If directed to evacuate the facility in accordance with evacuation protocol
- iv) Manager/Supervisor will notify necessary parties

# SPILL REPORT TO ODEQ

**\*\*Only Major Spills 42 Gallons or More Need to Be Reported Contact Regional EHS Manager Prior to calling for Further Direction\*\***

**INFORMATION NEEDED WHEN CALLING TO REPORT A RELEASE**

**Phone# (800) 452-0311**

Name: \_\_\_\_\_ Date: \_\_\_\_\_ Phone #: \_\_\_\_\_

Name of Person in Charge: \_\_\_\_\_ Phone #: \_\_\_\_\_

Company Name: \_\_\_\_\_ Address: \_\_\_\_\_

Date & Time Spill First Noticed: \_\_\_\_\_ Duration of Spill: \_\_\_\_\_

Location of Spill: \_\_\_\_\_ Source of Spill: \_\_\_\_\_

Cause of Discharge: \_\_\_\_\_ Estimated Amount of Discharge: \_\_\_\_\_

Description of Discharge & Type of Material: \_\_\_\_\_

Actions to Mitigate Immediate Damage from the Discharge and/or Clean Up: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

# LETTER & PARCEL BOMB RECOGNITION POINTS

**When receiving an unknown or strange letter or package it is always important to err on the side of caution to ensure the safety of yourself and others around you. Below are a few key points to use in identifying whether or not a package may contain something dangerous:**

- **Foreign Mail, Air Mail, and Special Delivery**
- **Restrictive Markings such as Confidential, Personal, etc.**
- **Excessive Packaging**
- **Hand Written or Poorly Typed Addresses**
- **Incorrect Titles**
- **Titles but No Names**
- **Misspellings of Common Words**
- **Oily Stains or Discoloration**
- **No Return Address**
- **Excessive Weight**
- **Rigid Envelope**
- **Lopsided or Uneven Envelope**
- **Protruding Wires or Tinfoil**
- **Excessive Securing Materials such as Masking Tape, String, etc.**
- **Visual Distractions**

# BOMB THREAT CHECKLIST

**QUESTIONS TO ASK**

- 1) When is the bomb going to explode?
- 2) Where is it right now?
- 3) What does it look like?
- 4) What will cause it to explode?
- 5) Did you place the bomb?
- 6) Why?
- 7) What is your name?

**Exact wording of the threat:**

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Sex of Caller: \_\_\_\_\_ Race: \_\_\_\_\_

Age: \_\_\_\_\_ Length of Call: \_\_\_\_\_

Number at which call was received:  
\_\_\_\_\_

Caller Familiar with the location: \_\_\_\_\_

Time: \_\_\_\_\_ Date: \_\_\_\_\_

Callers Voice – Check Each Box	
Calm	Angry
Excited	Stutter
Slow	Raspy
Rapid	Deep
Soft	Ragged
Loud	Laughter
Crying	Clearing Throat
Deep Breathing	Cracked Voice
Normal	Disguised
Distinct	Accent
Slurred	Familiar

**If voice is familiar, who did it sound like?**

\_\_\_\_\_

Back Ground Sounds – Check Each Box	
Street Noise	Factory Machinery
Animal Noises	Voices
Clear	PA System
Static	Local Call
Music	Long Distance
House Noises	Phone Booth
Motor	Office Equipment
Other:	

Threat Language – Check Each Box	
Well Spoken	Incoherent
Educated	Taped
Foul	Message Read
Irrational	Slang

**Additional Remarks:**

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

# EMERGENCY CONTACTS

<b>THERMO FLUIDS PERSONNEL</b>			
<b>Name</b>	<b>Position</b>	<b>Device</b>	<b>Number</b>
<b>David Arnold</b>	<b>Site Commander (Area Manager)</b>	<b>Office</b>	
<b>Pat Johnston</b>	<b>2<sup>nd</sup> Command</b>	<b>Mobile</b>	<b>(503) 209-5257</b>
<b>Eric Spencer</b>	<b>Regional Manager</b>	<b>Office</b>	<b>(503) 788-4612 ext. 1101</b>
		<b>Mobile</b>	<b>(503) 209-5249</b>
<b>Ryan Partridge</b>	<b>Regional EHS Manager</b>	<b>Office</b>	<b>(602) 272-2400 ext. 1004</b>
		<b>Mobile</b>	<b>(602) 341-0922</b>
<b>Greg Hedger</b>	<b>Corporate EHS Director</b>	<b>Office</b>	<b>(480) 302-6011</b>
		<b>Mobile</b>	<b>(602) 341-0923</b>
<b>Amy Tuggle</b>	<b>HR Director</b>	<b>Office</b>	<b>(480) 302-6221</b>
		<b>Mobile</b>	<b>(602) 295-2438</b>
<b>LOCAL AGENCIES</b>			
<b>Name/Services</b>		<b>Phone Number</b>	
<b>Ambulance, Police, or Fire Department</b>		<b>911</b>	
<b>Poison Control</b>		<b>1(800) 432-6866</b>	
<b>Arizona Dept. of Environmental Quality (Emergencies)</b>		<b>(800) 452-0311</b>	
<b>EPA Region 10</b>		<b>(206) 553-1263</b>	
<b>National Response Center (NRC)</b>		<b>1(800) 424-8802</b>	
<b>National Response Center, 24hr</b>		<b>(202) 219-6157</b>	
<b>ChemTrec (Large Spills)</b>		<b>1(800) 424-9300</b>	



# CERTIFICATE OF LIABILITY INSURANCE

12/16/2015

DATE (MM/DD/YYYY)

12/23/2014

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

**IMPORTANT:** If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER <b>LOCKTON COMPANIES</b> 5847 San Felipe, Suite 320 Houston TX 77057	CONTACT NAME:	
	PHONE (A/C, No, Ext):	FAX (A/C, No):
E-MAIL ADDRESS:		
INSURER(S) AFFORDING COVERAGE		NAIC #
INSURER A: <b>Ironshore Indemnity Inc.</b>		23647
INSURER B: <b>Practorian Insurance Company</b>		37257
INSURER C: <b>Zurich American Insurance Company</b>		16535
INSURER D: <b>Gemini Insurance Company</b>		10833
INSURER E:		
INSURER F:		

INSURED  
1389685 **Thermo Fluids, Inc**  
14624 N. Scottsdale Rd., Suite 300  
Scottsdale AZ 85254

**COVERAGES**

CERTIFICATE NUMBER: 13259278

REVISION NUMBER: XXXXXXXX

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR <input checked="" type="checkbox"/> Pollution Legal Liab GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC <input type="checkbox"/> OTHER	N	Y	001887801	12/31/2014	12/31/2015	EACH OCCURRENCE \$ 1,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 500,000 MED EXP (Any one person) \$ 25,000 PERSONAL & ADV INJURY \$ 1,000,000 GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COMP/OP AGG \$ 2,000,000
B	<input checked="" type="checkbox"/> AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO <input checked="" type="checkbox"/> ALL OWNED AUTOS <input checked="" type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS <input checked="" type="checkbox"/> NON-OWNED AUTOS <input checked="" type="checkbox"/> MCS-90	Y	Y	PICIS0001544	12/31/2014	12/31/2015	COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000 BODILY INJURY (Per person) \$ XXXXXXXX BODILY INJURY (Per accident) \$ XXXXXXXX PROPERTY DAMAGE (Per accident) \$ XXXXXXXX \$ XXXXXXXX
A	<input checked="" type="checkbox"/> UMBRELLA LIAB <input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DED RETENTION \$	N	Y	001887901	12/31/2014	12/31/2015	EACH OCCURRENCE \$ 20,000,000 AGGREGATE \$ XXXXXXXX XS of 6MM Auto \$ 15,000,000
C	<input checked="" type="checkbox"/> WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/ MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N	N/A	WC5833473-03	12/16/2014	12/16/2015	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTHER E.L. EACH ACCIDENT \$ 1,000,000 E.L. DISEASE - EA EMPLOYEE \$ 1,000,000 E.L. DISEASE - POLICY LIMIT \$ 1,000,000
D	Excess Auto	Y	Y	GVE100123701	12/31/2014	12/31/2015	5,000,000

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

**CERTIFICATE HOLDER**

CANCELLATION See Attachment

13259278

Thermo Fluids Inc. - PORTLAND  
12533 SE Carpenter Dr  
Clackamas OR 97015

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

ACORD 25 (2014/01)

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All policies include a blanket automatic waiver of subrogation endorsement [provision] that provides this feature only when there is a written contract between the named insured and the certificate holder that requires it. In the absence of such a contractual obligation on the part of the named insured, the waiver of subrogation feature does not apply.

The General Liability and Auto Liability policies include a blanket automatic additional insured endorsement that confers additional insured status to the certificate holder only if there is a written contract between the named insured and the certificate holder that requires the named insured to name the certificate holder as an additional insured. In the absence of such a contractual obligation on the part of the named insured, the certificate holder is not an additional insured under the policy.

The Umbrella policy includes an additional insured provision that includes "Any person or organization qualifying as an additional insured in underlying insurance but only to the same extent that such person or organization is an additional insured under such underlying insurance".

The Umbrella policy is a follow form policy and it will follow the forms of the General Liability, Auto Liability and Employer's Liability as scheduled in their underlying insurance.

The Excess Auto Policy follows form on Auto Liability.

The Workers Compensation includes Alternate Employer coverage under form # WC 00 03 01 (04-84).

The Workers Compensation/Employers Liability policy includes Stop Gap Employers Liability for OH, WA, ND & WY.



# CERTIFICATE OF LIABILITY INSURANCE

12/16/2015

DATE (MM/DD/YYYY)  
12/23/2014

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PRODUCER LOCKTON COMPANIES 5847 San Felipe, Suite 320 Houston TX 77057	CONTACT NAME:	
	PHONE (A/C, No, Ext):	FAX (A/C, No):
	E-MAIL ADDRESS:	
	INSURER(S) AFFORDING COVERAGE	NAIC #
INSURED 1389685 Thermo Fluids, Inc 14624 N. Scottsdale Rd., Suite 300 Scottsdale AZ 85254	INSURER A:	Ironshore Indemnity Inc. 23647
	INSURER B:	Practorian Insurance Company 37257
	INSURER C:	Zurich American Insurance Company 16535
	INSURER D:	Gemini Insurance Company 10833
	INSURER E:	

**COVERAGES** CERTIFICATE NUMBER: 13234546 REVISION NUMBER: XXXXXXXX

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
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B	<input checked="" type="checkbox"/> AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO <input checked="" type="checkbox"/> ALL OWNED AUTOS <input checked="" type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS <input checked="" type="checkbox"/> NON-OWNED AUTOS <input checked="" type="checkbox"/> MCS-90	Y	Y	PICIS0001544	12/31/2014	12/31/2015	COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000 BODILY INJURY (Per person) \$ XXXXXXXX BODILY INJURY (Per accident) \$ XXXXXXXX PROPERTY DAMAGE (Per accident) \$ XXXXXXXX
A	<input checked="" type="checkbox"/> UMBRELLA LIAB <input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DED RETENTION \$	N	Y	001887901	12/31/2014	12/31/2015	EACH OCCURRENCE \$ 20,000,000 AGGREGATE \$ XXXXXXXX XS of 6MM Auto \$ 15,000,000
C	<input checked="" type="checkbox"/> WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N N	N/A	WC5833473-03	12/16/2014	12/16/2015	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTH-ER E.L. EACH ACCIDENT \$ 1,000,000 E.L. DISEASE - EA EMPLOYEE \$ 1,000,000 E.L. DISEASE - POLICY LIMIT \$ 1,000,000
D	Excess Auto	Y	Y	GVE100123701	12/31/2014	12/31/2015	5,000,000

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

**CERTIFICATE HOLDER****CANCELLATION** See Attachment

13234546

 Thermo Fluids Inc. - PORTLAND  
 12533 SE Carpenter Drive  
 Clackamas OR 97015

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

All policies include a blanket automatic waiver of subrogation endorsement [provision] that provides this feature only when there is a written contract between the named insured and the certificate holder that requires it. In the absence of such a contractual obligation on the part of the named insured, the waiver of subrogation feature does not apply.

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The Excess Auto Policy follows form on Auto Liability.

The Workers Compensation includes Alternate Employer coverage under form # WC 00 03 01 (04-84).

The Workers Compensation/Employers Liability policy includes Stop Gap Employers Liability for OH, WA, ND & WY.



**Attachment G & H: PERMIT INFORMATION**

### Industrial Wastewater Discharge Permit - Section 1

1. Applicant Business Name Thermo Fluids, Inc

2. Address of Premises Discharging Wastewater:

Street 12533 SE Carpenter Dr.

City Clackamas State OR Zip 97015

3. Assessor's Map and Tax Lot Number: 22E E14A 01002

4. Mailing Address (if different from above):

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

5. Persons to be Contacted About This Permit:

(Primary) Name Jason Kendall Title Area Manager Phone 503-788-4612

(Alternate) Name \_\_\_\_\_ Title \_\_\_\_\_ Phone \_\_\_\_\_

(Billing) Name \_\_\_\_\_ Title \_\_\_\_\_ Phone \_\_\_\_\_

6. Method Used to Compute Industrial Monthly Sewer Service Charges:

- Metered Water Consumption  
 Volume of Wastewater Discharge

- Wastewater Strength  
 Other \_\_\_\_\_

7. Authorization and Fees:

The above named applicant is hereby authorized to discharge wastewater to the public sewer subject to said applicant's compliance with the District's Rules and Regulations, appropriate City Ordinance's, any applicable provisions of Federal or State law or regulation, and in accordance with the discharge limitations, monitoring requirements, and other conditions set forth herein, including the payment of all fees and charges as set forth below.

Annual Permit Fee

\$1,500.00

This permit is granted in accordance with the application filed on February 14, 2011 in the office of the Clackamas County Water Environment Services, and in conformity with plans, specifications, and other data submitted in support of the above application, all of which are filed with and considered as part of this permit:

8. Effective Date May 15, 2011

Expiration Date May 14, 2016

9. City's Representative

Signature \_\_\_\_\_

Date \_\_\_\_\_

10. District's Representative

Signature \_\_\_\_\_

Date \_\_\_\_\_

Permit No.	<u>01K-062-D</u>
Renewable - Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>
Initial	<input type="checkbox"/>
Renewal	<input checked="" type="checkbox"/>
SIU	<input checked="" type="checkbox"/>
Non-SIU	<input type="checkbox"/>
SIC No.	<u>2999</u>
EPA Category	<u>40 CFR 437</u>
Billing Responsibility	
City	_____ or District <input checked="" type="checkbox"/>
Treatment Plant	<u>Tri-City WPCP</u>

Permit Number: 1200-Z  
Effective: July 1, 2012  
Expiration: June 30, 2017  
Page 1 of 96

GENERAL PERMIT  
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
STORMWATER DISCHARGE PERMIT

Department of Environmental Quality  
811 S.W. Sixth Avenue, Portland, OR 97204  
Telephone: (503) 229-5630 or 1-800-452-4011 toll free in Oregon  
Issued pursuant to ORS 468B.050 and The Federal Clean Water Act

---

ISSUED TO: 9/18/2012      GEN 1200-Z      Clackamas County/NWR  
File Number: 115053      EPA Number: ORR706055

Thermo Fluids, Inc  
8925 E Pima Ctr Pkwy Ste 105  
Scottsdale, AZ 85258-4409

Site: Thermo Fluids, Inc.

---

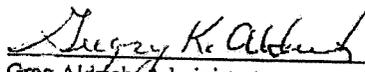
**SOURCES THAT ARE REQUIRED TO OBTAIN COVERAGE UNDER THIS PERMIT**

A facility that may discharge stormwater from a point source to surface waters or to conveyance systems that discharge to surface waters of the state and

- 1) The stormwater is associated with an industrial activity identified in *Table 1: Sources Covered* on p. 3; or
- 2) The facility is notified in writing by the Director that coverage under this permit is required for its stormwater discharges (see Note 1 below).

Note 1:

- 1) Facility is designated by the Director as needing a stormwater permit pursuant to 40 CFR §122.26(a)(9)(i)(D). Facility discharges stormwater associated with an industrial activity that is not described in *Table 1: Sources Covered* on p. 3 below.
- 2) Facilities may apply for conditional exclusion from the requirement to obtain coverage under this permit if there is no exposure of industrial activities and materials to stormwater pursuant to 40 CFR §122.26(g); see Permit Coverage and Exclusion from Coverage on p. 5 below.
- 3) The following activities are not required to obtain coverage under this permit:
  - (i) Construction activities; asphalt mix batch plants; concrete batch plants; and Standard Industrial Classification code 14, Mining and Quarrying of Nonmetallic Minerals, Except Fuels, and industrial stormwater discharges to the Columbia Slough Watershed or to conveyances leading to the Columbia Slough. These activities are required to obtain coverage under separate general permits.
  - (ii) Any source that has obtained an individual NPDES permit for the discharge, unless the source is otherwise eligible for coverage under this permit and DEQ has approved the source's application for coverage under it.
  - (iii) Any source that discharges to a sanitary sewer system and the discharge is approved by the sanitary sewer operator.

  
Greg Aldrich, Administrator  
Water Quality Division

Issuance Date: Oct. 1, 2011  
Amended Date: March 28, 2012

---



LEPPALUOTO Tina L  
<LEPPALUOTO.Tina@deq.state.or.us>

01/22/2013 09:06 AM

To "chunter@thermofluids.com" <chunter@thermofluids.com>

cc

bcc

Subject Air Contaminant Discharge Permit and Copy of 2012 Annual Report

History:

This message has been replied to.

2 attachments



03-0045 Thermo Fluids 2012 Annual Air Emissions Report.pdf 03-0045 Air Contaminant Discharge Permit.pdf

Hi Chris,

It was great talking with you this morning. As discussed the permit and last year's annual air emissions report are attached. The report is due on February 15' annually, if you need more time to get it prepared, let me know I'm okay with giving you an extension if necessary, since you are new in the position and need to get up to speed on the job details. Questions, please let me know. ~~As for the permit, a permit application has been submitted to DEQ back in Sept 2012, the permit is expired but remains enforce until the new one is issued. I currently have a backlog of permits that need to be renewed, so it will take some time before I can get to your permit to draft and send to you for review prior to the public notice process.~~ I will keep you posted on the status of your facility's permit renewal.

Thanks, and have a great day!

*Tina Leppaluoto  
DEQ/NWR Office  
2020 SW 4th Suite 400  
Portland Oregon 97201  
(P) 503-229-5027  
(F) 503-229-6945  
leppaluoto.tina@deq.state.or.us*



## Standard AIR CONTAMINANT DISCHARGE PERMIT REVIEW REPORT

Department of Environmental Quality  
Northwest Region

### Source Information:

SIC	2992/5093
NAICS	324191/423930

Source Categories (Table 1 Part, code)	Part B, #64
Public Notice Category	II

### Compliance and Emissions Monitoring Requirements:

FCE	
Compliance schedule	
Unassigned emissions	
Emission credits	
Special Conditions	X

Source test [date(s)]	
COMS	
CEMS	
PEMS	
Ambient monitoring	

### Reporting Requirements

Annual report (due date)	February 15 <sup>th</sup>
Quarterly report (due dates)	

Monthly report (due dates)	
Excess emissions report	
Other (specify)	

### Air Programs

Synthetic Minor (SM)	
SM -80	
NSPS (list subparts)	DDDD
NESHAP (list subparts)	
Part 68 Risk Management	
CFC	

NSR	
PSD	
RACT	
TACT	
Other (specify)	

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PERMITTING .....3  
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SPECIAL CONDITIONS.....6  
EMISSIONS .....7  
TITLE V MAJOR SOURCE APPLICABILITY .....8  
ADDITIONAL REQUIREMENTS.....8  
PUBLIC NOTICE.....9

## **PERMITTING**

### **PERMITTEE IDENTIFICATION**

1. Thermo Fluids, Inc.  
12533 SE Carpenter Drive  
Clackamas, Oregon 97015

### **PERMITTING ACTION**

2. The proposed permit is a renewal of an existing Air Contaminant Discharge Permit (ACDP) that was issued on 11/16/2007 and was originally scheduled to expire on 08/01/2012. The existing ACDP remains in effect until the proposed permit is issued because the permittee submitted a timely and complete application for renewal.

### **OTHER PERMITS**

3. Other permits issued or required by the DEQ for this source include NPDES storm water permit. The facility is registered as a used oil processor and hazardous waste transporter, ID ORQ 000 025 197.

### **ATTAINMENT STATUS**

4. The source is located in a maintenance area for carbon monoxide (CO) and Ozone. The source is an insignificant source of CO and the precursors (NO<sub>x</sub> and VOC) to ground level ozone.
5. The source is located in an area that is in attainment for all other pollutants.

## **SOURCE DESCRIPTION**

### **OVERVIEW**

6. The permittee operates an oil filter reclamation system – The McRae Combustion System. The system is used to process oil filters to reclaim metal. The process reclaims metals in the filters by burning off combustible parts of the filter and any remaining motor oil. The emissions from the McRae are controlled by a process afterburner. The facility was constructed in Vancouver, WA in January 1994 and moved to Portland in April 1996. A new facility was constructed in Clackamas, OR in June 2006.

7. The following changes have been made to the facility since the last permit renewal:
- a. Nine new antifreeze storage tanks were added to the tank farm in 2008. The new tanks are numbered 8, 9, 10, 12, 16, 17, 18, 19, and 20. A new tank chart is on file.
  - b. Major maintenance was performed on the McRae Combustion System; a complete overhaul was done in 2008, which included new refractory material, updated specification fuel preheating system, new door trolleys and seals, complete electrical update, and new filter baskets.

**PROCESS AND CONTROL DEVICES**

8. Existing air contaminant sources at the facility consist of the following:

a.

Tank ID	Capacity (gal)	Contents
1	18,000	Used Oil
2	18,000	Used Oil
3	18,000	Used Oil
4	18,000	Oily Water
5	18,000	Oily Water
6	18,000	Used Antifreeze
7	251,898	Used Oil
8	9,000	New Antifreeze
9	6,000	New Antifreeze
10	3,000	New Antifreeze
11	3,000	DI Water
12	3,000	New Antifreeze
16	18,000	New Antifreeze
17	10,000	New Antifreeze
18	10,000	New Antifreeze
19	10,000	New Antifreeze
20	10,000	New Antifreeze
21	18,000	Used Antifreeze
22	18,000	Used Oil
23	18,000	Used Oil
Drum(s)	55	Oil, Filters
Tote(s)	350	Solvent

- b. An oil filter reclamation system equipped with an afterburner – The McRae Combustion System (Model #M250B Oil Filter Processor), fired with used oil.

### McRae Oil Filter Burner Process

9. The McRae Combustion System is loaded with the used oil filters and incidental oil-contaminated absorbents by means of a forklift. After closing the doors, the unit is turned on and the processing cycle is then fully automatic. A normal processing cycle takes about 18 hours with an additional 4 hours of cool down time.

Three oil burners fire the thermal process with make-up air fans; cool down air dampers, and sprinkler nozzles. Primary chamber temperatures range from 850°F to 1400°F. Secondary chamber temperatures range from 1600°F to 2200°F. Stack temperatures range from 1650° to 1850°F.

At the beginning of the process cycle, there is typically about 300 gallons of used oil that drains from the oil filters through drains in the bottom of the McRae unit during the 18 hour cycle and is collected in a storage tank at the rear of the unit, where it will ultimately be used to fire the burners on the next processing cycle. The collected oil is typically at or below 100°F. Upon cycle completion, the baskets are removed and the processed steel is dumped into drop boxes ready to transport and sale.

As a specialty piece of equipment, the McRae unit has many automatic and manual safety features. Should the temperature become too high in either of the chambers, the unit shuts off the air to the unit thus suffocating the process. In conjunction with the regulations of air to the chambers, the unit is also equipped with water quench nozzles that can be activated at any time, automatically or manually to extinguish the process.

The McRae Combustion System (Model #M250B Oil Processor) does not contain a wet scrubber, however, the secondary chamber on the unit is a control device called a High Temperature Secondary Chamber Reduction Unit. This chamber reduces the products of combustion into CO<sub>2</sub>, water and trace elements. This is done by elevating the temperature to approximately 1750°F and holding the products of combustion at that temperature for a minimum of one second.

The McRae Combustion System can process up to 100 tons of used oil filters per week, but typically operates at a much lower rate.

### Used Oil Process

10. Thermo Fluids Inc. collects and recycles millions of gallons of used oil every year. They employ small collection trucks that collect used oil from industry and transport it to their processing facility. Before the oil is off loaded at their facility, a field test screen is run on each load to ensure that no hazardous solvents are contained in the oil. The oil is then offloaded through pre-filters into one of the day storage tanks. The oil is then pumped, via a closed system of pipes, through a very fine filter to remove contaminants and ends up in the 251,898 gallon fuel storage tank. The oil is tested by a certified laboratory to ensure that it meets the requirements to be called an on-

specification fuel. All processing of oil occurs at ambient temperatures. Once processed and tested, the oil is shipped to local companies that use the used oil fuel as an alternative to diesel, natural gas or bunker fuel.

#### Continuous Monitoring Devices

11. McRae Recorder: Honeywell Model 4500 Truling Recorder. The instrument records the temperature levels in the primary chamber and in the secondary chamber. It also records oxygen levels in the secondary chamber.

### **COMPLIANCE**

12. The facility was inspected on 7/22/2013 and found to be in compliance with permit conditions.
13. During the prior permit period there were no complaints recorded for this facility.
14. No enforcement actions have been taken against this source since the last permit renewal.
15. The previous permit required a source test of the McRae Combustion System to demonstrate compliance with the permit conditions and to verify emission factors. The source test could not accurately measure flow rates, therefore, only testing of gaseous emissions for NO<sub>x</sub>, and VOCs was performed with results reported on a parts per million volume dry basis. Source testing requirements have been removed from the permit since source testing of the McRae Combustion System cannot be performed in a manner that results in valid emission rate measurements. The permit uses AP-42 emission factors in calculations of McRae Combustion System emissions.

### **SPECIAL CONDITIONS**

16. No fuel, waste, wastewater, used oil and/or any other substance shall be used and/or processed on site if prohibited by any Department or federal regulations.
17. The permittee must provide a safe accessible sampling tap for each tank and storage vessel.
18. The permittee must maintain a clear and complete diagram of all tanks and process equipment, with a description of the purpose of each.
19. Minimum temperatures are required in combustion units.

## EMISSIONS

20. Proposed PSEL information:

Pollutant	Baseline Emission Rate (tons/yr)	Netting Basis *		Plant Site Emission Limits (PSEL)		
		Previous (tons/yr)	Proposed (tons/yr)	Previous PSEL (tons/yr)	Proposed PSEL (tons/yr)	PSEL Increase (tons/yr)
PM <sub>10</sub>	0	0	0	14	14	0
PM <sub>2.5</sub>	0	0	0	0	9	0
SO <sub>2</sub>	0	0	0	39	39	0
NO <sub>x</sub>	0	0	0	39	39	0
VOC	0	0	0	39	39	0

\*Netting basis is the same as baseline for this source.

- a. The baseline emission rate for this source is zero since it was constructed after 1978. All emission increases above baseline emission rates are below the Significant Emission Rates (SER). The facility is not subject to New Source Review (NSR).
  - b. Plant site emissions of CO are believed to be less than 1 ton per 12 consecutive month period therefore, the facility does not require a CO PSEL.
  - c. All PM is presumed to be PM<sub>10</sub>.
  - d. In a rulemaking action effective May 1, 2011, DEQ adopted PM<sub>2.5</sub> as a new criteria air pollutant. PM<sub>2.5</sub> is a fraction of PM<sub>10</sub>. A PM<sub>2.5</sub> PSEL is being added in this permit action. Unless the permittee performs source testing that distinguishes PM size distribution (not required) all PM emitted by the permittee will be assumed to be PM<sub>2.5</sub>. The addition of the PM<sub>2.5</sub> PSEL to the permit does not represent an emission rate increase by the permittee.
  - e. The previous PSEL is the PSEL in the last permit.
  - f. The proposed PSELs for all pollutants are equal to the Generic PSEL in accordance with OAR-
  - g. The PSEL is a federally enforceable limit on the potential to emit.
21. The McRae oil filter burner can process about 3,000 tons of used oil filters per week, and collects about 300 gallons of oil from the process per day (sulfur contents is <0.0052). The collected oil goes to the used oil tanks and is processed.
  22. The facility collects, filters, stores and sells in excess of 9 million gallons of used oil per year. This is ambient temperature filter process only, no heating involved.

### SIGNIFICANT EMISSION RATE ANALYSIS

23. For each pollutant, the proposed Plant Site Emission Limit is less than the Netting Basis

plus the significant emission rate, thus no further air quality analysis is required.

## **TITLE V MAJOR SOURCE APPLICABILITY**

### CRITERIA POLLUTANTS

24. A major source is a facility that has the potential to emit 100 tons/yr or more of any criteria pollutant. This facility is not a major source of criteria pollutant emissions.
25. Plant wide capacity to emit based on 8760 hours/year operations:

Pollutants	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
Filter Burner	2.8 tons/yr	7.4 tons/yr	3.6 tons/yr	0.9 tons/year	.02 tons/yr

### GHG POLLUTANTS

26. A major source for Title V Permit applicability is a facility that directly emits or has the potential to emit 100 tpy or more of greenhouse gases and directly emits or has the potential to emit 100,000 tpy or more CO<sub>2</sub>e, including fugitive emissions. This facility is not a major source of GHG emissions.

### HAZARDOUS AIR POLLUTANTS

27. A major source is a facility that has the potential to emit 10 tons/yr or more of any single HAP or 25 tons/yr or more of combined HAPs. This source is not a major source of hazardous air pollutants.
28. The source PTE is less than 80% of the threshold values for Title V for criteria pollutant, and less than 80% of the threshold values for title III for single HAPs and combined HAPs, therefore, full compliance evaluation (FCE) is not required for this facility.

## **ADDITIONAL REQUIREMENTS**

### NSPS APPLICABILITY

29. Pursuant to 40 CFR Part 60, Subpart DDDD Commercial Industrial Solid Waste Incinerators the permittee must not combust any solid waste, as that term is defined in 40 CFR Part 241, except for the primary purpose of recovering metals.
30. If the permittee burns materials other than traditional fuels as defined in 40 CFR 241.2 that have been discarded, and the permittee does not keep and produce records as

required by 40 CFR 60.2740(u), the operating unit is a commercial industrial solid waste incinerator unit.

31. If combusting a fuel that has been processed from a discarded non-hazardous secondary material pursuant to 40 CFR 241.3(b)(4), the permittee must keep records as to how the operations that produced the fuel satisfies the definition of processing in 40 CFR 241.2 and each of the legitimacy criteria in 40 CFR 241.3(d)(1). For operating units that combusts non-hazardous secondary materials as fuel per 40 CFR 241.4, the permittee must keep records documenting that the material is a listed non-waste under 40 CFR 241.4(a).

#### NESHAPS/MACT APPLICABILITY

32. There are no sources at this facility for which NESHAPS/MACT standards have been promulgated.

#### RACT APPLICABILITY

33. The facility is located in the Portland AQMA, but is not one of the listed source categories in OAR 340-232-0010, and does not have the potential emissions of 100 tons/year of VOC thus the RACT rules do not apply

#### TACT APPLICABILITY

34. The source is meeting the State's TACT/Highest and Best Rules by maintaining the McRae Combustion System with a properly functioning afterburner control device.

### **PUBLIC NOTICE**

35. Pursuant to OAR 340-216-0066(4)(a)(A), issuance of Standard Air Contaminant Discharge Permits require public notice in accordance with OAR 340-209-0030(3)(b), which requires DEQ to provide notice of the proposed permit action and a minimum of 30 days for interested persons to submit written comments. **The public notice was emailed/mailed on <date> and the comment period will end on <date>.**

tll:ggg

**Attachment I: CLOSURE PLAN AND FINANCIAL ASSURANCE**

**The facility is not required to have a closure plan for the activities that it conducts on site.**

February 26<sup>th</sup>, 2015

Metro Finance and Regulatory Services  
Solid Waste Compliance and Cleanup  
600 NE Grand Avenue  
Portland, OR 97232-2736

**RE: Metro Solid Waste Renewal Application for Permit No. L-121-11**

To whom this may concern:

Attached to this letter please find the Metro Solid Waste Renewal Application for Thermo Fluids Inc. located at 12533 SE Carpenter Drive, Clackamas, OR 97015. In the permit renewal application you will notice that attachment F and attachment J are currently missing as they have been submitted for approval but have not yet been received back.

- **Attachment F: Land Use Compatibility Statement (LUCS)** was submitted to Clackamas County for review. Currently the statement is pending and upon receipt of the approval TFI will send the statement to Metro Solid Waste Compliance and Cleanup department for review.
- **Attachment J: Property Use Consent Form** has also been submitted and is currently awaiting signature from the leasing company that owns the property where Thermo Fluids operates. This will also be sent via FedEx to Metro Solid Waste Compliance Cleanup department for review upon receipt.

Also, it should be noted this packet contains a letter notifying of an anticipated change in ownership which is planned to take effect in early to mid-March 2015. Once the transaction of Thermo Fluids is complete a follow up notification will be sent.

If you should have any questions please do not hesitate to contact me at (602) 341 – 0922.

Sincerely,



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