Biennial Hazardous Waste Activities Report

2005 & 2006 Reporting Years

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Introduction

The Maine Biennial Hazardous Waste Report for 2005 and 2006 has been prepared by the Maine Department of Environmental Protection ("Department") to fulfill the requirements of 38 M.R.S.A. § 1319-Q (2) for biennial reporting on the generation, transportation, and handling of hazardous waste in Maine.

Hazardous waste information was tallied using the Department's hazardous waste manifest computer database. All facilities that ship hazardous waste, regardless of quantity, are required to use a hazardous waste manifest. Department staff enters shipment information from the manifests into the Department's manifest database. The unit of measure used in this report for the quantity of waste is pounds. The hazardous waste quantities reported on the manifests which are not reported in pounds (i.e. gallons, liters, etc.) are converted to pounds using conversion factors based upon the type of waste. This report does not include hazardous waste generated and treated on-site under abbreviated treatment licenses since this waste is not transported, the data is not entered into the manifest database, and it is a relatively minor amount compared to the shipment data. This report also does not include information about waste oil or bio-medical waste generation or shipment. The report data has been supplemented with information on universal wastes including information from the manufacturer take-back program.

This report includes manifest data from shipments of hazardous waste from all facilities that generated and shipped hazardous waste in 2005 and 2006. This includes facilities that are regulated in Maine's three categories of hazardous waste generators (Small Quantity Generators, Small Quantity Generator Plus, and fully regulated generators or Large Quantity Generators). The report also includes waste quantities from "one-time generators" of hazardous waste. Small Quantity Generators (SQGs) generate up to 100 kilograms or 220 pounds per month and cannot accumulate more than one 55-gallon drum or 440 pounds on site at any one time. SQGs have the fewest regulatory requirements. Those in the Small Quantity Generator Plus (SQG Plus) category have the same monthly generation restrictions as SQGs, but can accumulate up to three 55-gallon drums or 600 kilograms of hazardous waste on site at any one time. SQG Plus generators have extra regulatory requirements in addition to those that SQGs must adhere to. Fully regulated generators (a.k.a. large quantity generators or LQGs) generate more than 100 kilograms or 220 pounds per month or accumulate more than 600 kilograms on site at any one time. Both SQG Plus and fully regulated generators are required to obtain a permanent US Environmental Protection Agency (EPA) identification number. SQGs use the generic identification number, MEX020000000. A provisional number system is used for "one-time generators" of hazardous waste to facilitate emergency shipments for one-time clean-ups or remediation projects. The "one-time generators" are issued temporary identification numbers beginning with the "MEP" prefix. Examples of one-time generation of hazardous waste include site remedial activity and underground gasoline storage tank removals.

Waste Generation

For the 2005 and 2006 Biennial Hazardous Waste Report, the Department's hazardous waste manifest database was analyzed for generation amounts, waste codes, and export information for all generators. In years prior to 1993, the Department's manifest database did not exist and report analysis was primarily based on EPA-required Biennial Report data, which was submitted only by fully regulated generators. Therefore, those reports did not include data from all hazardous waste generators. The use and maintenance of the Department's manifest database facilitates more complete analysis and provides for more consistent reporting on hazardous waste activities. In addition, the database has reduced the time needed to complete data reviews and analyses.

In 2005, 18,706,929 pounds of hazardous waste and in 2006, 13,612,721 pounds of hazardous waste were generated and shipped by Maine generators. Universal wastes, a sub-category of hazardous waste which includes fluorescent lamps, cathode ray tubes, mercury switches and other wastes, are not included in the totals reported in Tables 1 - 4 and Figures 1 - 5. Data related to the recycling efforts for universal wastes are reported and discussed in this report, beginning on page 9 and in Table 5 and Figures 6 - 10.

Table 1 shows the quantities of hazardous waste generation in Maine for 2005 and 2006 by generator type, while Figures 1 and 2 illustrate the percentage of hazardous waste shipped by generator type for 2005 and 2006, respectively. Generator types in Table 1 include: Generators with Assigned Numbers (i.e. Fully regulated/LQGs and SQG Plus generators); One-time Generators (i.e. assigned a temporary "MEP" ID number to facilitate a one-time hazardous waste clean-up or removal); and Small Quantity Generators (SQGs which do not have permanent IDs but use the generic MEX020000000 ID number for manifested hazardous waste shipments).

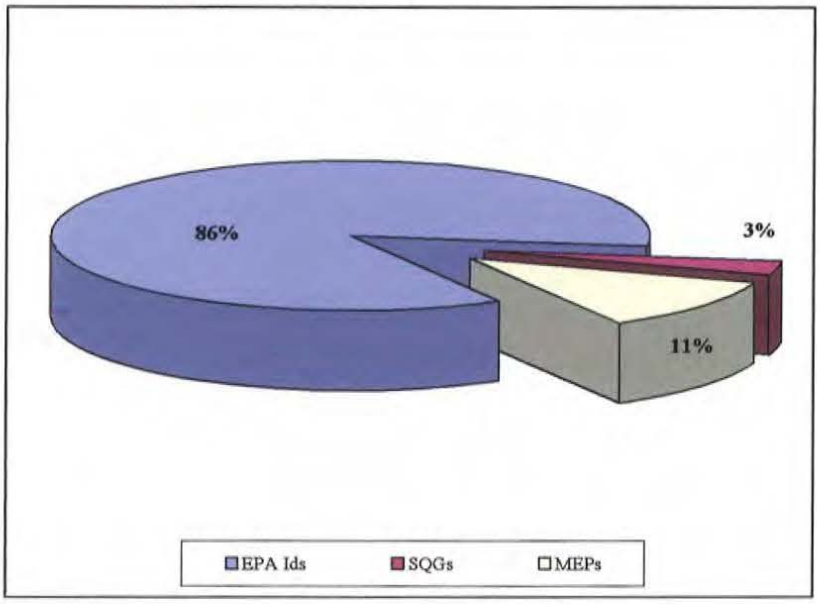
Table 1

Hazardous Waste Shipping Information from Manifests

Generator Type	Quantity in Pounds for 2005	Quantity in Pounds for 2006
Generators with Assigned ID Numbers	16,010,498	11,145,143
One-time Generators (MEP ID #s)	2,145,231	2,070,971
Small Quantity Generators	551,200	396,607
Total	18,706,929	13,612,721

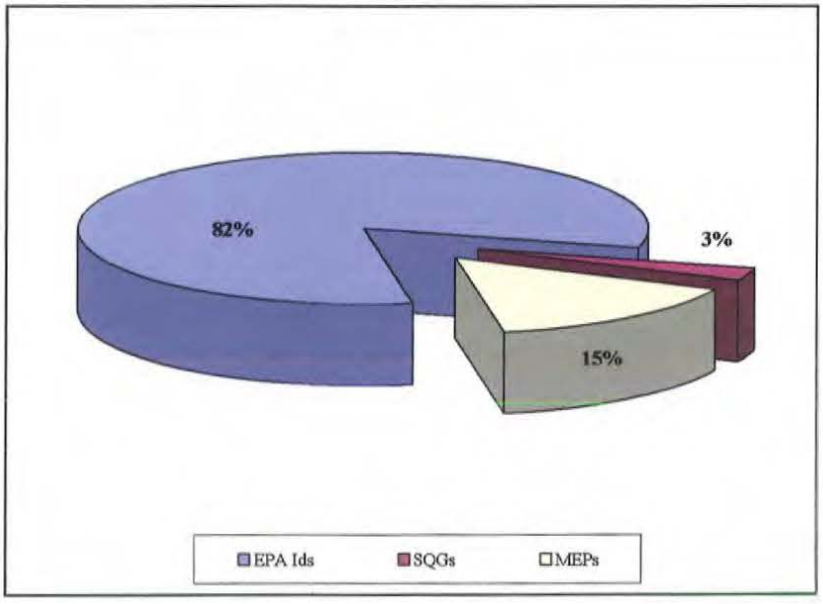
2005 Hazardous Waste Generation

Figure 1



2006 Hazardous Waste Generation

Figure 2



For a breakdown, by waste code, of the quantity of hazardous waste generated in pounds for 2005 and 2006, see Table 2. For a graphical representation of this same data, see Figures 3

and 4. The Waste Codes in the table and figures, except for M002 (PCB's over 50 ppm), are federally-assigned waste codes adopted by Maine's Hazardous Waste Management Rules, for identifying waste types. Polychlorinated biphenyls (PCBs) are regulated by EPA as toxic substances, but in Maine, wastes containing fifty (50) parts per million or greater of PCBs are listed as a hazardous waste and are assigned the waste identification code M002. It should be noted that the data in Table 2 and Figures 3 and 4 represent an approximate breakdown of hazardous waste quantities by waste code. The reason for the approximation is that many wastes can have more than one waste code to describe that waste and there is no State or Federal coding protocol, providing for any specific precedence of one waste code over another when coding wastes which have multiple waste codes. Therefore, the data represents "waste types" (i.e. ignitable, corrosive, metals & pesticides, etc.) which include the quantity of wastes identified by the waste code, for wastes in which only that waste code is used, along with the quantity of wastes in which that waste code is the first waste code listed for the waste item described on a manifest.

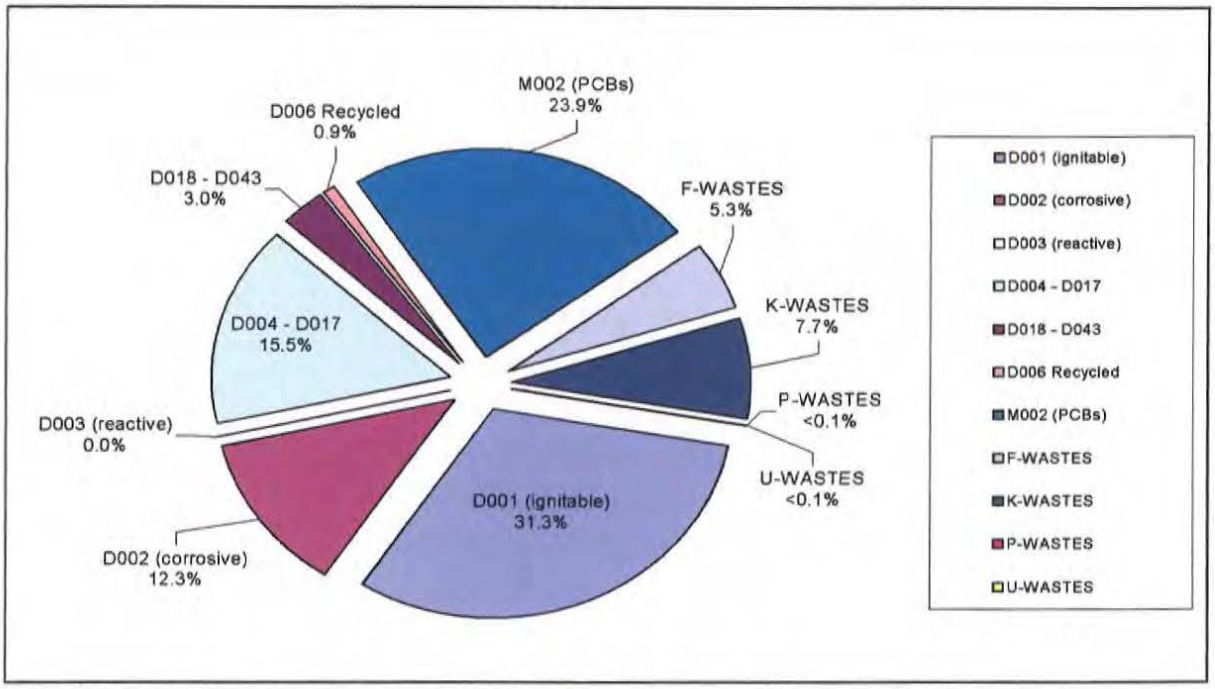
Table 2

Total Quantity of Hazardous Waste Generated in 2005 and 2006 by Waste Code

Waste Codes (Types)	Quantity in Pounds for 2005	Quantity in Pounds for 2006
D001 (Ignitable)	5,855,331	4,400,076
D002 (Corrosive)	2,305,199	2,705,438
D003 (Reactive)	6,099	3,759
D004-D017 (metals & pesticides)	2,892,672	3,819,761
D018-D043 (Federal TCLP organics)	562,854	915,513
D006 (recycled plastic with cadmium)	162,243	213,786
F-wastes (non-specific source wastes)	994,687	410,736
K-wastes (specific source wastes)	1,434,522	64,695
M002 (PCB's over 50 ppm)	4,475,067	1,028,295
P-wastes (acute wastes)	655	822
U-wastes (toxic wastes)	17,600	9,058
Total	**18,706,929**	**13,612,721**

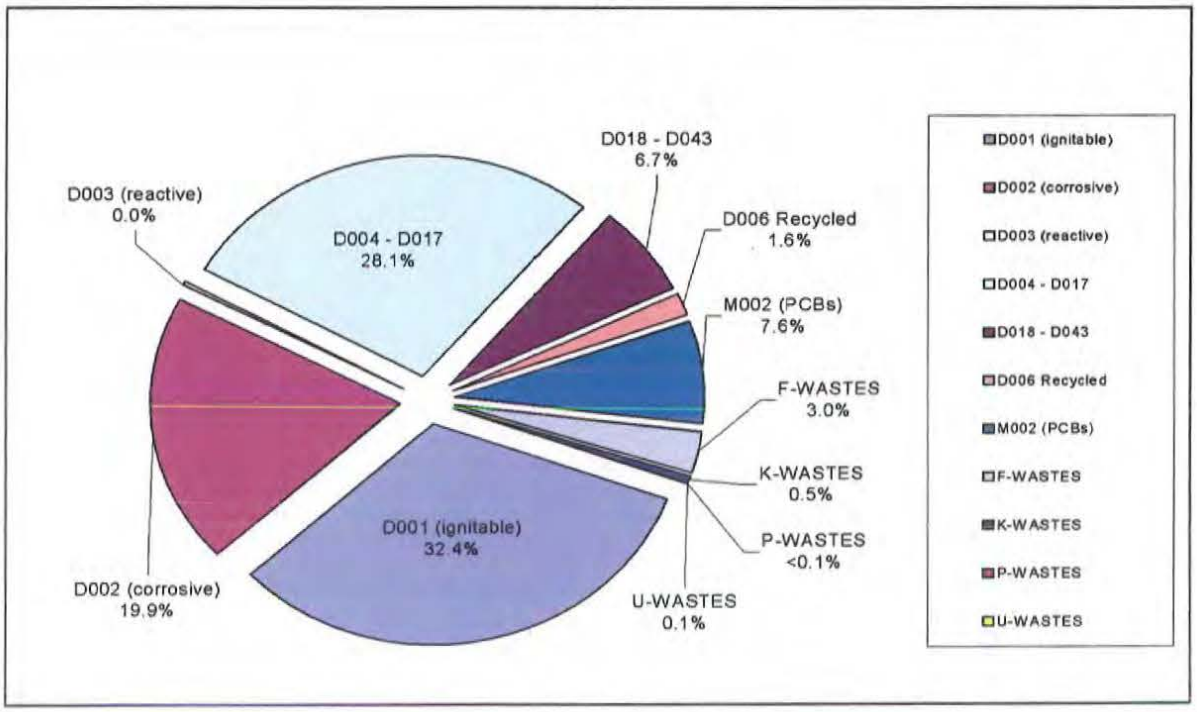
2005 Hazardous Waste by Waste Codes

Figure 3



2006 Hazardous Waste by Waste Codes

Figure 4



Waste Generation Trends

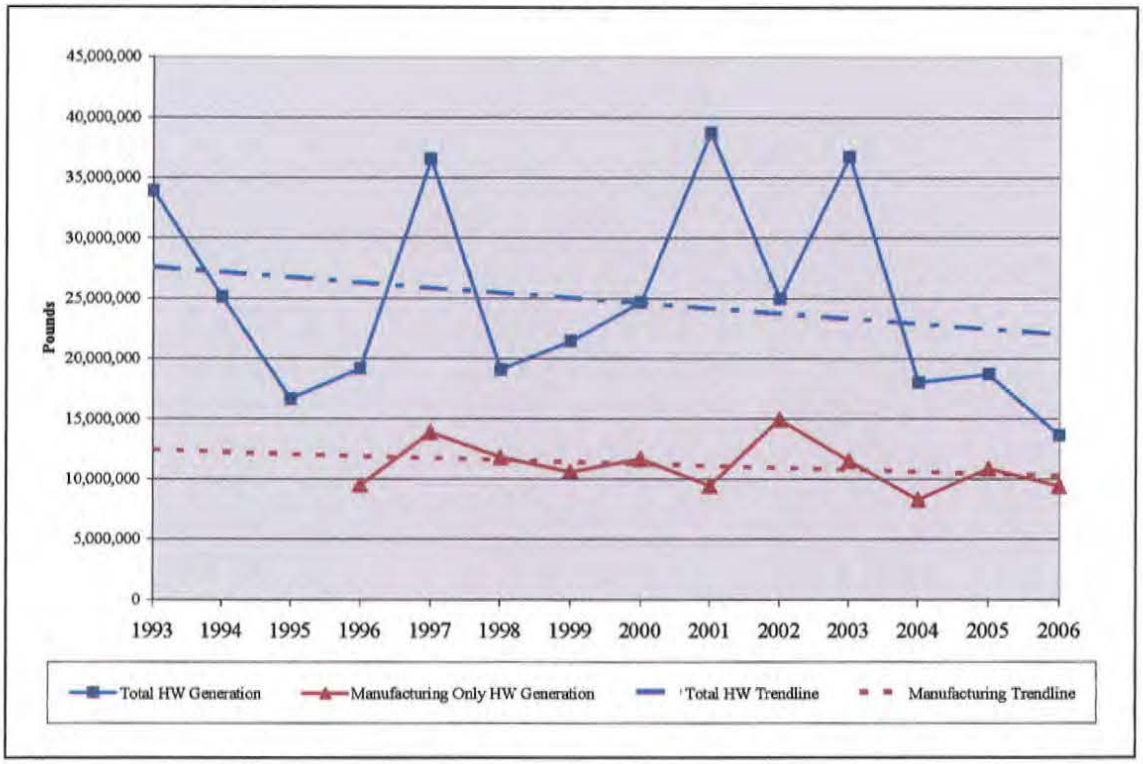
Hazardous waste trends were analyzed for SQGs and generators with permanent EPA identification numbers to assess overall generation gains and/or declines. Figure 5 illustrates the hazardous waste generation trends since 1993. Two different sets of data and corresponding trend lines are plotted in the graph below.

The first trend line is the total amount of hazardous waste generated in Maine, which includes hazardous waste from manufacturing, commercial activities, as well as remediation sites such as superfund sites, corrective action sites and other remediation sites. This trend varies considerably from year to year depending on the number of remediation/ corrective action projects underway during each year and the volume of clean-up wastes generated from such projects. For example, the peaks that occurred in 1997, 2001, and 2003 were a result of major remediation or clean-up projects. The peak in 1997 was due primarily to over 18 million pounds of hazardous remediation waste shipped from the F. O'Connor superfund site in Augusta, Maine. The peak in 2001 was due primarily to over 22 million pounds of hazardous removed from the Harry Smith Junkyard clean-up project in Meddybemps, Maine. The peak in 2003 was primarily the result of two major clean-up projects - one involving the Eastland Woolen Mill superfund site in Corinna, Maine, where 14,242,000 pounds of soil contaminated with the chlorinated solvent chlorobenzene (F002) were removed, and the second involving the National Semiconductor Corporation facility in South Portland, Maine where 6,654,000 pounds of soil contaminated with chlorinated and non-chlorinated solvents (F001, F002 & F003) were removed as a result of remediation activities. During this report period, in 2005, the most significant remedial action project involved approximately 4 million pounds of PCB-contaminated soils which were removed from the Wolman Steel site in Waterville, Maine as part of a site clean-up project. In addition, during this report period, approximately 1.6 million pounds of mercury-contaminated wastes were removed from the Holtrachem site in Orrington, Maine during 2005, and approximately 2 million pounds of wastes were removed from Holtrachem during 2006.

The second trend line in the graph shows hazardous waste generated from manufacturing and commercial activities since 1996, excluding site remediation wastes. This trend indicates that hazardous waste generated from all manufacturing and commercial activities has decreased slightly since 1996.

Hazardous Waste Generation Trends Analysis

Figure 5



Licenses and Abbreviated Licenses

As of December 2006 there are seventy-one (71) hazardous waste licenses currently in effect. This includes fifty-two (52) Beneficial Reuse On-site, two (2) Re-use in solid form, three (3) Treatment in Tanks, six (6) Precious Metal Recovery, two (2) Transfer Facility, three (3) Commercial Storage, one (1) Commercial Treatment and Storage and two (2) Post Closure license. Twenty-three (23) licenses and abbreviated licenses were issued or renewed in 2005 and fifteen (15) were issued or renewed in 2006. A complete listing of the companies by license type can be found in Appendix A.

Import/Export Information

Imports: Approximately 1,019,000 pounds in 2005 and 467,000 pounds in 2006 of hazardous waste were imported into Maine from other states for treatment or recycling. ENPRO Services of Maine (ENPRO) in South Portland, Maine was the receiving facility for over 90% of the imported hazardous waste in 2005 and 100% of the imported hazardous waste in 2006. ENPRO is fully permitted and licensed by the Department to treat gasoline and oil-contaminated water as well as store hazardous waste for transport to other locations. Additionally, Portsmouth Naval Shipyard in Kittery, Maine imported hazardous waste from out-of-state military facilities to store for subsequent transport to facilities licensed for treatment or disposal. Portsmouth Naval Shipyard imported 1,200 pounds in 2005 and no hazardous waste in 2006 from out-of-state military facilities. Portsmouth Naval Shipyard is fully permitted and licensed by the Department

to receive and store hazardous waste from other military facilities. See Table 3 for amounts of hazardous waste imported from other states and Canada. The amount of waste imported is based on the wastes that are deemed hazardous in the State of Maine, and does not include waste deemed hazardous in another state or country, if that waste (i.e. waste oils) is not considered hazardous waste in Maine.

Table 3

Hazardous Waste Imported from Out of State or Canada:

State (from)	Total (pounds) 2005	Total (pounds) 2006
Connecticut	460	1,800
Massachusetts	264,000	277,000
New Hampshire	737,000	184,000
New York	0	0
Rhode Island	2,450	1,080
Vermont	7,900	870
Virginia	6,000	1,800
Canada	0	0
Total	1,019,000	467,000

Exports: Of the 18,707,000 pounds of hazardous waste generated and shipped by Maine generators in 2005, 94% (17,630,000 pounds) was exported to other states and Canada for treatment, storage, or disposal. Of the 13,613,000 pounds generated in Maine in 2006, 94% (12,764,000 pounds) was exported to other states and Canada. For a complete breakdown of wastes exported to other states and Canada, see Table 4.

Table 4

Maine Waste Exported to Other States/Foreign Countries

State (to)	Total (pounds) 2005	Total (pounds) 2006
Canada	3,147,000	3,005,400
Alabama	166,300	69,100
Arkansas	22,200	23,700
Arizona	400	0
Colorado	0	0
Connecticut	526,500	593,700
Florida	8,200	0
Georgia	0	0
Idaho	0	0
Illinois	56,600	52,400
Indiana	188,200	147,700
Kansas	0	0
Kentucky	206,300	114,800
Louisiana	0	0
Massachusetts	2,241,300	2,053,100
Maryland	0	2,300
Michigan	4,262,600	253,600
Nebraska	0	1,700
New Hampshire	41,100	1,400

New Jersey	1,869,400	1,932,300
New York	1,789,700	1,826,500
North Carolina	139,600	58,300
Ohio	1,251,900	1,349,100
Pennsylvania	760,500	632,200
Rhode Island	581,300	305,400
South Carolina	8,000	5,400
Tennessee	700	46,400
Texas	9,500	200
Utah	51,000	14,300
Virginia	0	0
Vermont	0	0
Washington	0	0
Wisconsin	56,000	42,300
Total	17,384,300	12,531,300

Maine Waste Received by Maine Treatment and Storage Facilities

In 2005, 2,094,900 pounds of hazardous waste generated in Maine and in 2006, 1,294,400 pounds of hazardous waste generated in Maine was shipped to licensed treatment or storage facilities (TSF) within the state. Safety-Kleen Corporation in Leeds, Maine received approximately 300,000 pounds in 2005 and 226,000 pounds in 2006 of this waste. Most of this waste is parts washer solvent that Safety-Kleen bulks in on-site storage tanks for shipment to an off-site treatment (reclamation) facility. ENPRO Services of Maine in South Portland received approximately 1,733,900 pounds of Maine-generated waste in 2005 and 1,055,400 pounds in 2006 of Maine-generated waste consisting primarily of waste gasoline and water mixtures. Other than the gasoline-contaminated wastewater treated on-site, the remaining hazardous waste (primarily waste gasoline) received by ENPRO is ultimately sent out of state for treatment and/or disposal. Additionally, Portsmouth Naval Ship Yard, a licensed storage facility, receives hazardous and universal wastes from other military facilities (to store, bulk and subsequently ship to licensed treatment or disposal facilities) and in 2005 received approximately 26,600 pounds of hazardous waste and in 2006 received approximately 13,000 pounds of hazardous waste generated at military facilities located in Maine.

Hazardous Waste Facilities

A listing of commercial hazardous waste facilities within the United States, based on 2005 biennial report data, is available at the Department. A copy of the list can be obtained for a fee by contacting the National Technical Information Service at (703) 487-4650 or via the Internet at no charge at: http://www.epa.gov/epaoswer/hazwaste/data/br05/index.htm . In Maine, there are four fully licensed commercial hazardous waste facilities. They include three commercial storage facilities licensed by the Department: Safety-Kleen Corp. in Leeds, Central Maine Power in Augusta, and Portsmouth Naval Shipyard in Kittery; and one licensed commercial treatment and storage facility, ENPRO Services of Maine in South Portland which treats gasoline and oil-contaminated wastewaters that have the characteristic for ignitability.

Transporters

Maine's hazardous waste generators are required to ship their wastes using licensed hazardous waste transporters. Transport companies apply to be licensed annually by the Department. The Department licenses the company, the conveyances, and the conveyance operators. Driver's records are reviewed. The companies, once listed, are placed on a list of licensed transporters which is available to the public. A complete list of transporters, their site and mailing addresses, and phone numbers is supplied in Appendix B and is available on the Department's web site at: http://www.maine.gov/dep/rwm/data/pdf/activehaztrans.pdf.

Universal Waste

A universal waste is a hazardous waste that is specifically designated by the Board of Environmental Protection as a universal waste because it is widely generated. Small businesses that typically do not generate other hazardous waste do generate universal waste. On January 23, 2001, the Hazardous Waste Management Rules were amended to include a category called Universal Wastes and to encourage recycling and proper management of these wastes.

Universal wastes include mercury or lead containing lamps (Sodium Vapor, HID or fluorescent), mercury thermostats, cathode ray tubes (CRTs), non-leaking polychlorinated biphenyls (PCBs) lamp ballasts, mercury devices such as mercury thermometers and switches, mercury switches from automobiles, and certain batteries. Electronic devices containing circuit boards are also being managed as universal waste even though it is not defined in the Rules. Data on the quantities of universal waste items collected at municipally-owned Central Accumulation Facilities, and at sites sponsored by the Rechargeable Battery Recycling Corporation (RBRC) and the Thermostat Recycling Corporation (TRC), is included in this report. This data may include household waste which meets the description of universal waste.

Universal waste shipments are tracked by either a log system, through the use of Uniform Bills of Lading (UBOLs), or reports from manufacturer take back programs. The UBOLs are entered into the Department's manifest database. Universal waste can be collected at Central Accumulation Facilities (company or municipally owned) and commercial Consolidation Facilities before being shipped to a Recycling Facility. Universal Waste going to a Recycling Facility must be documented on a UBOL. The Department arrived at the numbers for this report by reviewing the manifest database, reports from the TRC and RBRC manufacturer take back programs, and reports of motor vehicle mercury switch collections from the Alliance of Automobile Manufacturers, Subaru, the Truck Manufacturers Association and the Recreational Vehicle Industry Association. Table 5 lists the number of universal waste items that were shipped for recycling or disposal in 2005 and 2006. Figures 6 & 7 show the number of items in a bar graph format. The number of lamps is depicted separately in Figure 7 because the total number of lamps vastly outnumbers all other categories. The pie charts shown in Figures 8 and 9 documents that mercury and lead containing lamps make up the largest portion of universal waste handled. Figure 10 illustrates the number of universal waste items that have been sent for recycling for the years 2003 through 2006.

On May 8, 2007 the Electronic Industries Alliance applied to the Pipeline and Hazardous Materials Safety Administration of United States Department of Transportation (US DOT) for a determination that certain requirements related to the transportation of cathode ray tubes (CRTs) under regulations administered by the Maine Department of Environmental Protection are

preempted by the Federal Hazardous Materials Transportation Law and the Hazardous Materials Regulations. The Electronic Industries Alliance (EIA) is a trade association representing the electronics industry and other high technology industries. The EIA objects to Maine regulations concerning intact and broken CRTs. Maine regulates broken CRTs and CRT glass under its hazardous waste requirements including licensed transport and tracking requirements, because CRT glass is contaminated with lead at levels above the toxicity threshold. Maine regulates intact, unbroken CRTs under State universal waste requirements, including tracking documentation to ensure the lead-contaminated CRTs are recycled.

Maine and other states have several concerns with EIA's petition and argument. First, the EIA petition is an attack on the ability and right of state and local governments to require standards that are more stringent than federal standards. In the same vein, there is concern with the corollary argument that the EIA petition makes, i.e. that states are compelled to follow suit whenever the United States Environmental Protection Agency (US EPA) relaxes federal hazardous waste regulations.

Secondly, Maine and other states are concerned that the EIA position, if accepted, could set a precedence for such preemptions and limit a state's ability to identify or add other state-specific universal wastes under the state's regulations– even though US EPA has clearly provided states with the authority to expand the list of universal waste beyond the federal list in order to meet state-specific needs.

Thirdly, Maine is concerned that if EIA's preemption petition prevails, then Maine's UBOL requirement will be preempted, making it impossible to track and report on the recycling efforts, which currently is possible by compiling the UBOL transportation records. In addition, tracking of compliance with recycling requirements for universal wastes such as CRTs would be compromised.

Maine expects that the petition will be public noticed by the US DOT some time during 2007 or 2008. It is expected that numerous states and state organizations will submit comments on Maine's behalf. The Environmental Council of the States (ECOS) has already submitted a letter to the US EPA on Maine's behalf stating its opposition to the EIA petition. A copy of the ECOS letter is found in Appendix C.

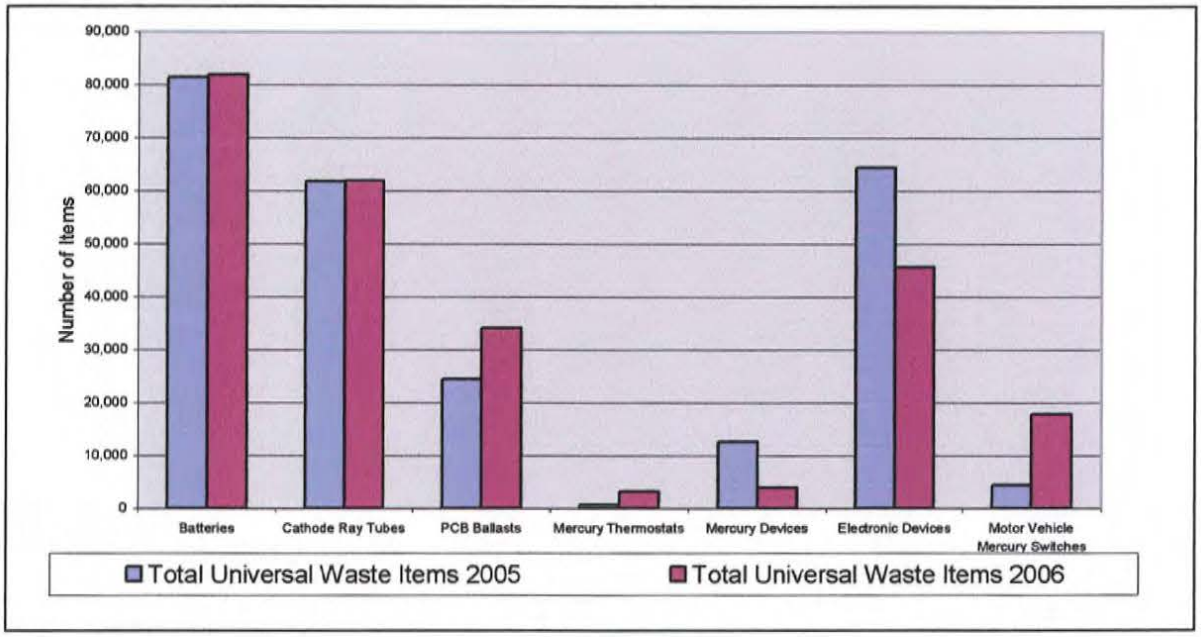
Table 5

Universal Waste Items Recycled or Disposed by Type

Type of Universal Waste	Total number of items in 2005	Total Number of items in 2006
Mercury or lead containing lamps	819,689	671,349
Batteries	81461	81,892
Cathode Ray Tubes	61,977	107,367
PCB Ballasts	24,534	34,106
Mercury Thermostats	1,990	3,262
Mercury Devices	12,604	3,937
Motor Vehicle Switches	4,520	17,801
Electronic Devices	64,528	45,627

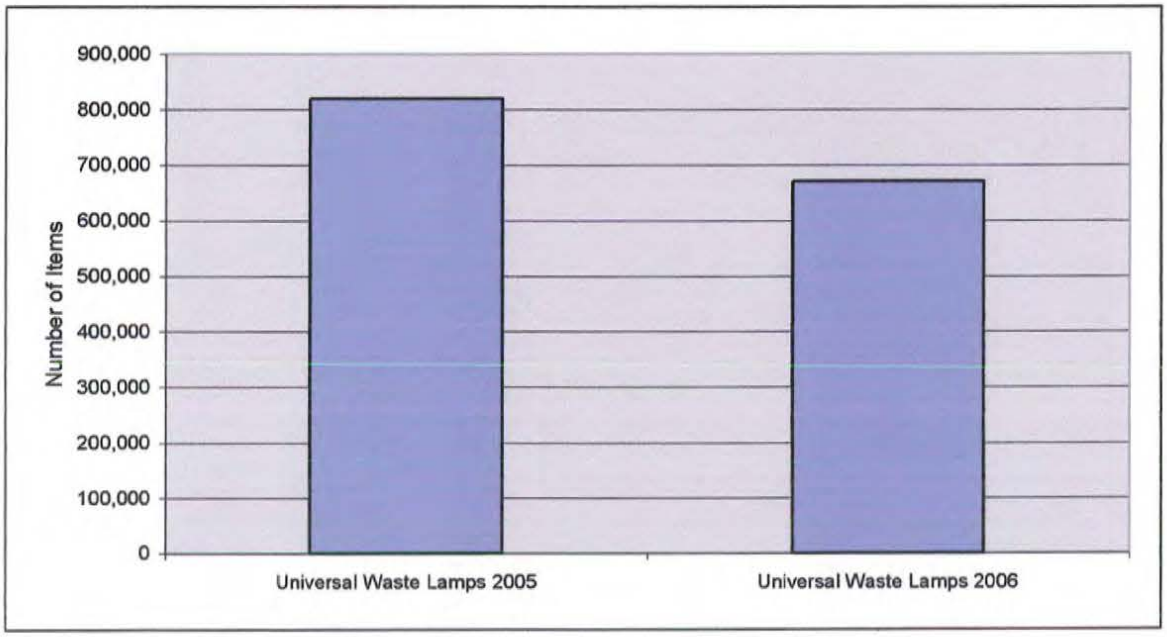
2005 & 2006 Universal Waste Handled Excluding Lamps

Figure 6



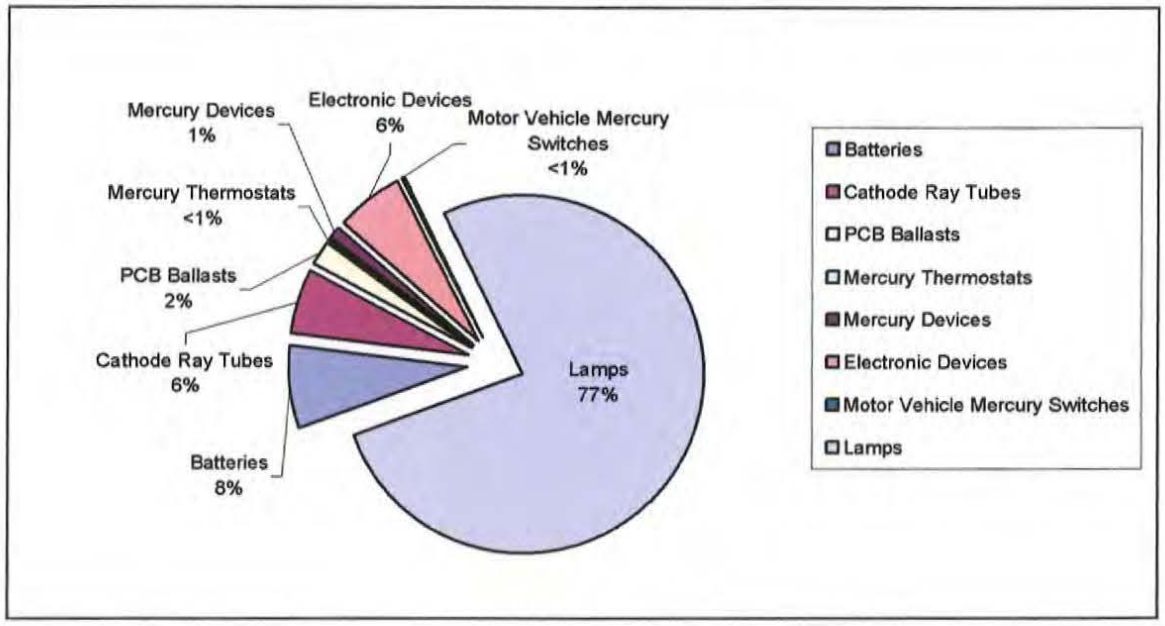
2005 & 2006 Universal Waste Lamps Recycled

Figure 7



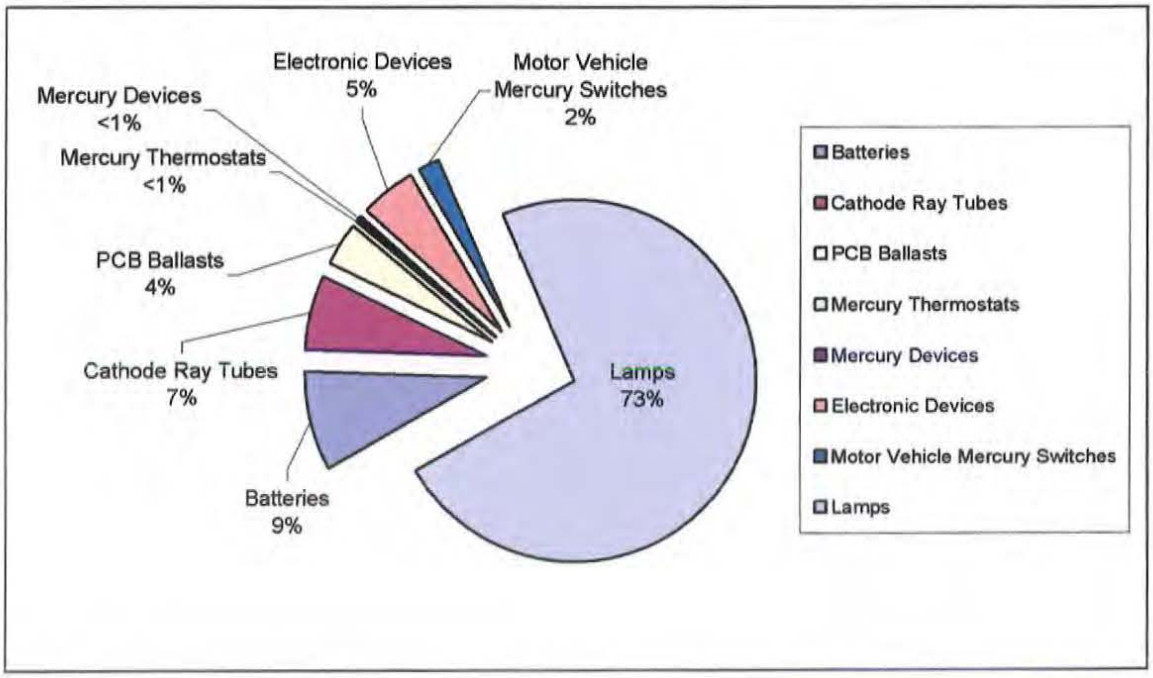
Total Universal Waste Items in 2005

Figure 8



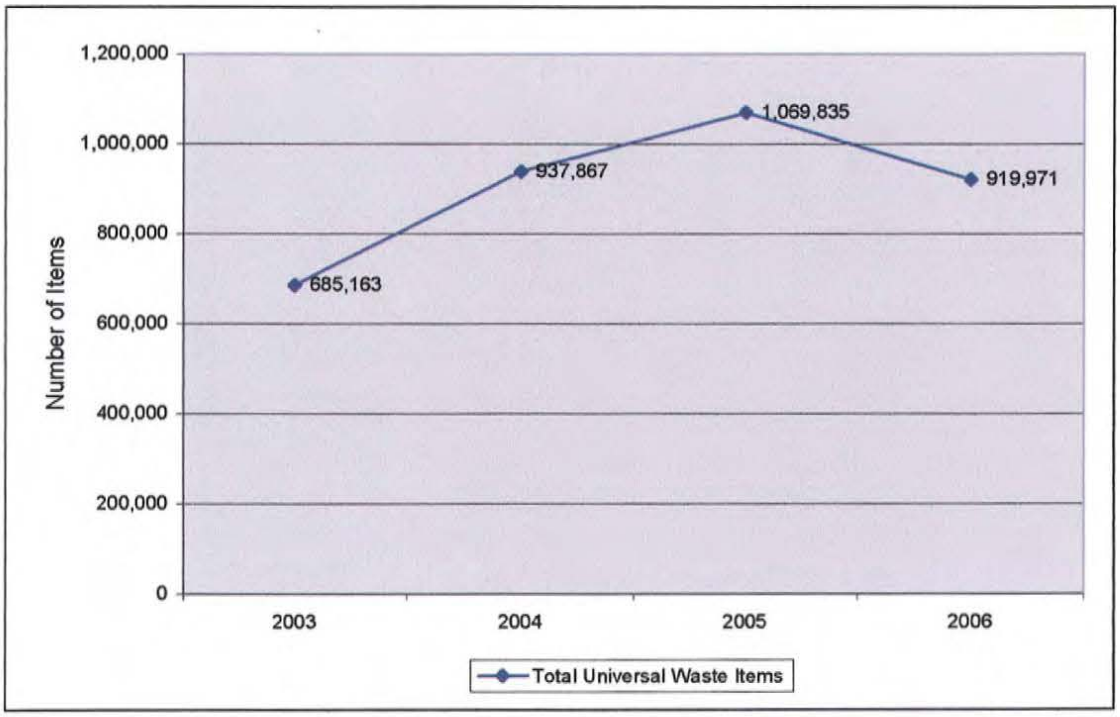
Total Universal Waste Items in 2006

Figure 9



Total Universal Waste Items

Figure 10



Appendix A

Licenses and Abbreviated Licenses

I. Abbreviated License Treatment Facilities

Beneficial Reuse On-site	License Number
BATH IRON WORKS	000015-HL-I-M
BATH IRON WORKS (EBMF)	000130-HL-E-R
BATH IRON WORKS (HARDING FAC.)	000129-HL-E-R
BESSEY MOTOR SALES	000195-HL-A-N
BICKFORD AUTO BODY	000164-HL-B-R
BILL DODGE AUTO GROUP	000180-HL-B-N
BLOUIN MOTORS	000145-HL-D-R
BRADLEYBOAT, INC	000215-HL-A-N
BROADWAY COLLISION CENTER	000038-HL-D-R
CARON'S COLLISION REPAIR CTR.	000082-HL-C-R
CENTRAL MAINE MEDICAL CENTER	000226-HL-A-N
CHARLIES COLLISION CENTER	000218-HL-A-N
CIANBRO FABRICATION & COATING	000013-HL-H-R
CITYSIDE COLLISION CENTER	000201-HL-A-N
CIVES STEEL, NE DIVISION	000080-HL-C-R
COLEMAN'S COLLISION CENTER	000177-HL-B-R
COLLETTE'S BODY SHOP	000241-HL-A-N
CYRO INDUSTRIES	000155-HL-C-R
DAHL-CHASE DIAGNOSTIC SVCS	000206-HL-A-N
DUTCH CHEVY-OLDS-BUICK-PONTIAC	000188-HL-B-R
EMERSON CHEVROLET	000204-HL-A-N
FIRST TECHNOLOGY/CONTROL DEVIC	000183-HL-C-R
FORMED FIBER TECHNOLOGIES INC	000210-HL-A-N
GAC CHEMICAL CORP	000182-HL-D-N
GENERAL DYNAMICS ARMAMENT & TE	000234-HL-A-N
HEWS COMPANY	000170-HL-B-R
IMAGINEERING INC D/B/A WEATHER	000230-HL-A-N
IRVING TANNING CO, ANNEX FAC	000037-HL-D-R
KINGFIELD WOOD PRODUCTS	000238-HL-A-N
LOCKARD'S COLLISION CENTER	000123-HL-C-R
LYMAN MORSE BOATBUILDING	000214-HL-A-N
MASTERS MACHINE	000157-HL-D-R
MAURICE & SON AUTO BODY SHOP	000171-HL-B-R
NORTH END COMPOSITES	000200-HL-A-N
O'CONNER GMC	000217-HL-A-N
OLD TOWN CANOE CO	000104-HL-D-R
OSRAM SYLVANIA	000176-HL-B-R
OXFORD HILLS TECHNICAL SCHOOL	000203-HL-A-N
PATTISON SIGN GROUP	000212-HL-A-N
PERFORMANCE PRODUCT PAINTING	000033-HL-C-R
PORTSMOUTH NAVAL SHIPYARD	000005-HL-P-N
REED'S AUTO BODY INC	000057-HL-C-N
ROWE FORD SALES	000160-HL-B-R
SABRE CORP.	000022-HL-D-R

SAUNDERS BROTHERS	000207-HL-A-N
SEACOAST AUTO BODY	000259-HL-A-N
SHEPARD MOTORS	000220-HL-A-N
ST MARY'S REGIONAL MEDICAL CTR	000233-HL-A-N
TIBBETTS REFINISHING INC	000211-HL-A-N
VERSO PAPER - ANDROSCOGGIN MIL	000062-HL-H-R
WAUSAU-MOSINEE PAPER	000199-HL-A-N
WEIR'S MOTOR SALES	000156-HL-B-R

Treatment in Tanks	**License Number**
BATH IRON WORKS (EBMF)	000130-HV-C-R
MONSON COMPANIES	000036-HV-E-R
NAUTEL MAINE, INC	000085-HV-C-R

Precious Metal Recovery	**License Number**
BATES COLLEGE	000223-HT-A-N
MAINE COLLEGE OF ART	000222-HT-A-N
MAINE PHOTO WRKSHOP-HOMESTEAD	000172-HT-C-R
MAINE PHOTO WRKSHOP-UNION	000084-HT-D-R
UNIVERSITY OF NEW ENGLAND	000209-HT-A-N
UNIVERSITY OF SOUTHERN MAINE	000208-HT-A-N

Transfer Facility	**License Number**
CLEAN HARBORS	000032-HR-E-R
ENPRO SVCS OF MAINE, INC.	000017-HR-J-R

Re-Use of Hazardous Waste In Solid Form	**License Number**
MAINE RS-MAINTENANCE CTR	000202-RA-A-N
SERMATECH	000007-RA-E-N

Hazardous Waste Post Closure	**License Number**
CONTROL DEVICES, INC, STANDISH	000070-HG-C-N
MAINE ELECTRONICS	000153-HG-C-R

II. Full Facility Licenses

Commercial Treatment and Storage	**License Number**
ENPRO SERVICES OF MAINE, SOUTH PORTLAND	000017-H1-J-R

Commercial Storage	**License Number**
CMP,NORTH AUGUSTA SRVC CTR, AUGUSTA	000001-HA-C-A
PORTSMOUTH NAVAL SHIPYARD, KITTERY	000005-HA-N-N
SAFETY-KLEEN CORP., LEEDS	000028-HA-H-R

Appendix B

Active Hazardous Waste Transporters

ID #	COMPANY NAME	MAIL ADDRESS	CITY	STATE	ZIP	EXPIRATION
H411 W109	21ST CENTURY ENVIRONMENTAL MGT	275 ALLENS AVE	PROVIDENCE	RI	02905	02/26/2008
H505 W505	ADVANCED LIQUID RECYCLING	14 WEST MAIN STREET	MERIDEN	CT	06451	10/11/2008
H448 W448	ALLSTATE POWER VAC	928 EAST HAZELWOOD AVE	RAHWAY	NJ	07065	06/01/2008
H417 W115	AMERITECH ENVIRONMENTAL SVC	PO BOX 539 93 DOW HIGHWAY	ELIOT	ME	03903	02/02/2008
H325 W038	ASHLAND CHEMICAL CO	PO BOX 1300	BINGHAMTON	NY	13902	10/27/2008
H506 W506	ATC LINCOLN ASSOC	333 WASHINGTON HIGHWAY	SMITHFIELD	RI	02917	10/12/2008
H503	AUTOBODY SOLVENT RECOVERY CORP	180 CANAL STREET 5TH FLOOR	BOSTON	MA	02114	03/08/2008
H461 W461	AUTUMN INDUSTRIES INC	518 PERKINS-JONES RD	WARREN	OH	44483	02/27/2008
H499 W499	B & D ASSOCIATES INC	PO BOX 1076	GRANTHAM	NH	03753	11/16/2008
H312 W035	BED ROCK INC D/B/A TRI-STATE MOTOR	PO BOX 113	JOPLIN	MO	64802	07/25/2008
H495 W495	BOOM TECHNOLOGY INC	45 NEWELL STREET	GORHAM	ME	04038	01/27/2008
H330	BUFFALO FUEL CORP	4870 PACKARD RD	NIAGARA FALLS	NY	14304	12/13/2008
H412 W110	CAB SVC INC	PO BOX 8	DOVER	NH	03821	04/23/2008
H258	CENTRAL MAINE POWER CO	83 EDISON DR	AUGUSTA	ME	04336	04/25/2008
H105 W001	CLEAN HARBORS ENVIRONMENTAL SERVICE	PO BOX 9149	NORWELL	MA	02061	06/07/2008
H425	CLEAN VENTURE INC	201 SOUTH FIRST ST	ELIZABETH	NJ	07206	04/25/2008
H015 W010	CM LABORATORIES	1 COMMERCIAL RD	SCARBOROUGH	ME	04074	03/09/2008
H457 W457	CORPORATE ENVIRONMENTAL ADVISORS INC	127 HARTWELL ST	WEST BOYLSTON	MA	01583-2409	12/26/2007
H402 W101	CYCLE SOLVE CORP OF NEW ENGLAND INC	167 MILL ST	CRANSTON	RI	02905	04/12/2008
H283 W004	CYN OIL CORPORATION	PO BOX 119	STOUGHTON	MA	02072	06/02/2008
H321	DART TRUCKING CO	41738 ESTERLY DRIVE	COLUMBIANA	OH	44408	06/21/2008
H480 W480	EARTH PROTECTION SERVICES INC	PO BOX 23820	PHOENIX	AZ	85063	09/11/2008
H479 W479	EARTH TECHNOLOGY II LLC	PO BOX 338	NORTH HAVEN	CT	06473	05/23/2008
H248 W248	ENPRO SVC INC	12 MULLIKEN WAY	NEWBURYPORT	MA	01950	03/30/2008
H408 W106	ENVIRITE OF PENNSYLVANIA INC	730 VOGELSONG RD	YORK	PA	17404	01/13/2008
H455 W455	ENVIRONMENTAL PRODUCTS & SVS OF VT INC	PO BOX 4620	BURLINGTON	VT	05406-4620	11/27/2007
H446 W446	ENVIRONMENTAL PROJECTS INC	PO BOX 1417	AUBURN	ME	04211	04/14/2008

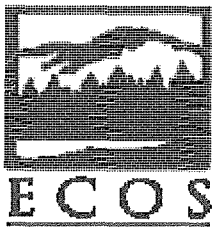
ID #	COMPANY NAME	MAIL ADDRESS	CITY	STATE	ZIP	EXPIRATION
H113 W113	ENVIRO-SAFE CORP	14B JAN SEBASTIAN DRIVE	SANDWICH	MA	02563	07/16/2008
H454 W454	ENVIROSERVE, J.V.	5502 SCHAAF RD	CLEVELAND	OH	44131	10/24/2008
H029 W072	EQ NORTHEAST INC	PO BOX 617	WRENTHAM	MA	02093	04/12/2008
H428 W428	FLEET ENVIRONMENTAL SERVICES LLC	75D YORK AVE	RANDOLPH	MA	02368	12/17/2008
H407 W105	FORTRESS TRUCKING LTD	7079 WELLINGTON COUNTY	GUELPH	ON	N1H 6J3	08/28/2008
H311 W311	FRANKS VACUUM TRUCK SVC	4500 ROYAL AVE	NIAGARA FALLS	NY	14303	07/06/2008
H047 W047	FREEHOLD CARTAGE INC	PO BOX 5010	FREEHOLD	NJ	07728	11/28/2007
H476	GLOBAL REMEDIATION SERVICES INC	1 WESTINGHOUSE PLAZA	BOSTON	MA	02137	03/22/2008
H500	GOULET TRUCKING INC	PO BOX 259	SOUTH DEERFIELD	MA	01373	01/03/2008
H463 W463	GUERIN ASSOCIATES LLC	332 NEW PORTLAND ROAD	GORHAM	ME	04038	03/22/2008
H420	H & S TANK CLEANING INC	PO BOX 3355	PEABODY	MA	01960	03/24/2008
H086	HAZMAT ENVIRONMENTAL GROUP INC	60 COMMERCE DR	BUFFALO	NY	14218	10/05/2008
H493 W493	HERITAGE CRYSTAL CLEAN LLC	2175 POINT BLVD SUITE 375	ELGIN	IL	60123	01/31/2008
H422	HERITAGE TRANSPORT	7901 W MORRIS ST	INDIANAPOLIS	IN	46231	05/22/2008
H472 W472	HITTMAN TRANSPORT SERVICES	628 GALLAHER RD	KINGSTON	TN	37763	10/06/2007
W435	HO BOUCHARD INC	PO BOX 249	HAMPDEN	ME	04444	06/29/2008
W501	JANUARY TRANSPORT INC	2701 SOUTH PROSPECT	OKLAHOMA CITY	OK	73129	02/08/2008
H038	JB SILVA	61 NICHOLS ST	DANVERS	MA	01923	08/12/2008
H489 W489	LAIDLAW CARRIERS BULK GP INC	1179 RIDGEWAY ROAD	WOODSTOCK,	PQ	N4S 8P6	12/04/2007
H453 W453	LINCOLN ENVIRONMENTAL INC	333 WASHINGTON HIGHWAY	SMITHFIELD	RI	02917	10/19/2007
W496	MAINE DEPARTMENT OF TRANSPORTATION	SHS 16	AUGUSTA	ME	04333	05/18/2008
H410 W114	MAINE LABPACK INC	248 PREBLE ST	S PORTLAND	ME	04106	02/11/2008
H421 W421	MAUMEE EXPRESS INC	PO BOX 278	SOMERVILLE	NJ	08876	03/26/2008
H430	MAXYMILLIAN TECHNOLOGIES INC	1801 E ST	PITTSFIELD	MA	01201	01/22/2008
H451	MHF-LS EQUIPMENT INC	800 CRANBERRY WOODS DR	CRANBERRY	PA	16066	07/27/2008
H504 W504	N & D TRANSPORTATION CO INC	PO BOX 919	SLATERSVILLE	RI	02896	03/28/2008
H434 W434	NATIONAL ENVIRONMENTAL SERVICE	175 PARAMOUNT DRIVE	RAYNHAM	MA	02767-1065	06/15/2008

ID #	COMPANY NAME	MAIL ADDRESS	CITY	STATE	ZIP	EXPIRATION
H473	NATIONAL WASTE MANAGEMENT	362 PUTNAM HILL RD	SUTTON	MA	01590	02/01/2008
H423	NEW ENGLAND DISPOSAL TECH	83 GILMORE DRIVE	SUTTON	MA	01590	05/20/2008
H378 W093	OIL ENERGY RECOVERY INC	PO BOX 492	STOW	MA	01775	07/25/2008
H354 W354	PAGE E T C INC	PO BOX 1290	WEEDSPORT	NY	13166	04/09/2008
H482 W482	PORTSMOUTH NAVAL SHIPYARD	CODE 106.3 BLDG 44	PORTSMOUTH	NH	03804	11/04/2007
H150	PRICE TRUCKING CORP	67 BEACON ST	BUFFALO	NY	14220	08/05/2008
H469	RADIAC RESEARCH CORP	261 KENT AVE	BROOKLYN	NY	11211	12/20/2007
H502 W502	ROBBIE D WOOD INC	PO BOX 125	DOLOMITE	AL	35061	03/01/2008
H345	RST INDUSTRIES LTD	PO BOX 1316	ST JOHN	NB	E2LAH8	03/24/2008
H064 W111	S J TRANSPORTATION CO	PO BOX 169	WOODSTOWN	NJ	08098	04/09/2008
H040 W100	SAFETY KLEEN SYSTEMS INC	5400 LEGACY DR CLUSTER II B3-	PLANO	TX	75024	03/31/2008
H426 W426	SCHNEIDER NATL BULK CARRIERS INC	PO BOX 2700	GREEN BAY	WI	54306	11/02/2007
H467	SET ENVIRONMENTAL INC	450 SUMAC RD	WHEELING	IL	60090	10/25/2008
H161	ST JOSEPH MOTOR LINES	PO BOX 5	WOODLAND	PA	16881	06/01/2008
H465 W465	T F BOYLE TRANSPORTATION	15 RIVERHURST RD	BILLERICA	MA	01821	07/25/2008
H394 W094	TCI OF NY LLC	39 FALLS RD INDUSTRIAL PK	HUDSON	NY	12534	02/24/2008
W498	TEAM HEARTLAND INC	4560 WEST PIKE	ZANESVILLE	OH	43702	10/26/2008
H494 W494	TMC SERVICES INC	ONE WILLIAM WAY	BELLINGHAM	MA	02019	06/02/2008
H034 W034	TONAWANDA TANK TRANSPORT SVC	PO BOX H	BUFFALO	NY	14217	07/08/2008
H145 W145	TRANSFORMER SERVICES INC	PO BOX 1077	CONCORD	NH	03302-1077	10/31/2008
H145	TRANSFORMER SVC INC	PO BOX 1077	CONCORD	NH	03302	10/31/2007
H409 W107	TRANSPORT ROLLEX LTEE	910 LIONEL BOULET	VARENNES QUEBEC	PQ	J3X 1P7	01/28/2008
H431 W431	TRIAD TRANSPORT INC	PO BOX 818	MCALESTER	OK	74501	03/23/2008
H338	TRIUMVIRATE ENVIRONMENTAL INC	61 INNER BELT RD	SOMERVILLE	MA	02143	04/17/2008
H397 W097	TYREE ORGANIZATION LTD	9 OTIS ST	WESTBOROUGH	MA	01581	08/18/2008
H351 W351	UNITED INDUSTRIAL SERVI CES DIV OF UNITED	14 16 W MAIN ST	MERIDEN	CT	06451	01/29/2008
H440 W440	UNIVAR USA INC	PO BOX 730 COLONIAL RD	SALEM	MA	01970	01/04/2008

ID #	COMPANY NAME	MAIL ADDRESS	CITY	STATE	ZIP	EXPIRATION
H363	US BULK TRANSPORT INC	205 PENNBRIAR AVE	ERIE	PA	16509	03/02/2008
H400 W425	VEOLIA ES TECHNICAL SOLUTIONS LLC	1 EDEN LANE	FLANDERS	NJ	07836	12/05/2007
H368 W074	WEAVERTOWN TRANSPORT LEASING	201 SOUTH JOHNSON RD	HOUSTON	PA	15342	07/22/2008
W478	WENTWORTH GREENHOUSES INC D/B/A	141 ROLLINS RD	ROLLINSFORD	NH	03869	04/29/2008
H376 W376	WEST CENTRAL ENVIRONMENTAL COR	PO BOX 83	RENSSELAER	NY	12144	05/19/2008
H377 W080	WESTERN OIL INC	PO BOX 518	LINCOLN	RI	02865	06/02/2008

Appendix C

ECOS Letter



THE
ENVIRONMENTAL
COUNCIL OF
THE STATES

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October 26, 2007

Ms. Susan Bodine
Assistant Administrator
U.S. Environmental Protection Agency
Office of Solid Waste and Emergency Response
1200 Pennsylvania Ave NW
Washington, DC 20460

Dear Ms. Bodine:

I am writing on behalf of the ECOS Waste Committee to ask for your support of the states in opposing a petition by the Electronic Industries Alliance (EIA) to the Department of Transportation (DOT) to preempt some Maine regulatory requirements related to transportation of cathode ray tubes.

On May 8, 2007, the EIA applied to the Pipeline and Hazardous Materials Safety Administration of DOT for a determination that certain requirements related to the transportation of cathode ray tubes (CRTs) imposed by the Maine Department of Environmental Protection are preempted by the Federal Hazardous Materials Transportation Law and the Hazardous Materials Regulations. The EIA objects to Maine regulations concerning intact and broken CRTs. Maine regulations subject broken CRTs and CRT glass to hazardous waste transport requirements and intact CRTs to state universal waste requirements.

As a basis for its petition, EIA argues that CRTs do not qualify as hazardous wastes or hazardous materials under federal hazardous materials transportation regulations. EIA cites EPA guidance that CRTs destined for use, reuse or repair, and unused CRTs destined for reclamation are not solid wastes. EIA also cites EPA's conditional exclusion of CRTs from the definition of solid waste. EIA claims that, in the absence of a characterization as a federal hazardous waste, CRTs do not meet the definition of "hazardous material" for the purpose of federal hazardous material transportation regulations.

The states have several concerns with EIA's petition and argument. First, states believe that the EIA petition is an attack on their ability, under Section 3009 of RCRA, to impose standards that are more stringent than federal standards. In the same vein, states are concerned with the corollary argument made in the EIA petition that if the United States Environmental Protection Agency relaxes federal hazardous waste regulations, states are compelled to follow suit.

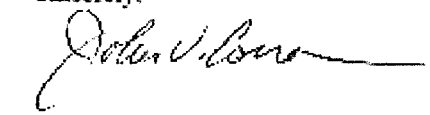
Also, EIA's argument conflicts with past precedents as EPA has determined that a waste identified as universal waste by EPA but not by an authorized state must be managed in accordance with the full range of hazardous waste regulations, not as a universal waste, while it is being transported in or through the State that has not yet designated it universal waste. In other words to receive the benefit of reduced universal waste regulations, states along the transportation route must have adopted the universal waste designation. In essence EIA is asking to undermine the central tenet of EPA's universal waste program, which is a deregulation scheme in nature.

Additionally, states are concerned that the EIA position, if accepted, could limit a state's ability to add state-specific universal wastes to the state's regulations, since a similar preemption argument could be made for state requirements for any waste that EPA has not identified as a federal universal waste – even though EPA has clearly provided states with the authority to expand the list of universal wastes to meet state-specific needs.

Finally, states have a specific concern about EIA's argument that Maine's CRT universal waste requirements are "broader in scope" rather than "more stringent" for authorization purposes. This is directly refuted by EPA in the preamble discussion of state authorization issues for the EPA rule that granted conditional exclusion for CRTs from the definition of solid waste. Quoting from the EPA Federal Register notice, "States currently regulating CRTs as hazardous waste, including under the universal waste rule, would not have to amend their programs, since their programs are more stringent than the federal requirements." (71 Fed. Reg. 42944, 7/28/2006)

As a result of these various issues between EIA's petition and EPA rules and precedents, the ECOS Waste Committee asks for your support in opposing the petition. We appreciate your consideration of our concerns and your help in this matter.

Sincerely,



John V. Corra
Director, Wyoming Department of Environmental Quality
Chair, ECOS Waste Committee

Cc:
Matt Hale, Director
Office of Solid Waste