

### III. Company Overview

#### A. The Indiana Facility

**TRADEBE Treatment and Recycling, LLC** (Formerly known as Pollution Control Industries) began operations at the East Chicago, Indiana facility in 1986. The facility's property sits on approximately 11 acres in a heavy industrial section of East Chicago and is approximately 20 miles south of downtown Chicago, Illinois. TRADEBE's neighbors include a commercial gas manufacturer, a rail-yard, and a vacant aluminum smelting facility. The closest water stream is the Indiana Harbor Canal, which is approximately 2,700 feet west of the facility. The facility is not located within a one hundred-year flood plain. The majority of the property is dedicated to serving TRADEBE's waste management operations. Also located on the facility's property is a rail-line that accommodates up to ten rail cars. The Elgin, Joliet and Eastern Rail Company serve TRADEBE's rail operation. The facility has no known site contamination. The facility has storage capacity for up to 11,000 "55 gallon drum equivalent" containers of hazardous waste. TRADEBE's operation includes a 164,714 gallon tank farm, a newly redesigned state-of-the-art lab pack/depac facility, a drum consolidation and handling building, recycling units and a non-hazardous processing building with 45,327 gallons of bulk treatment capacity.



In July of 2004, a significant new capability was added to its range of services called SDS or Solid Distillation System. Before SDS the materials processed through TRADEBE's facilities had to be sent off site for final treatment or disposal. Now SDS allows TRADEBE to process and recycle waste materials on site. The process is unique because unlike other thermal processes, the material never contacts the heat source. It is baked rather than burned and the baking drives off volatile and semi-volatile organics that are reclaimed and recycled. IDEM acknowledges the SDS as a recycling process therefore all materials it processes receives a Certificate of Recycling. TRADEBE also operate three Liquid Distillation Units.



TRADEBE's main sales, customer service, administrative and corporate functions are managed from the East Chicago location. The East Chicago and Memphis facilities, as well as the company's satellite offices, are connected with a computer network and state-of-the-art inventory management system to streamline communications for customer service, waste movement and waste management operations. TRADEBE has developed specific programs to meet the operations' growing needs. The programs also support the administrative and the regulatory conditions needed to accommodate a changing and every more demanding regulated industry. Personnel are fully supported with computer-based programs that enhance their departmental responsibility to the operations. Customer information, profiles and shipping documents are entered into the computer system to generate TRADEBE's operating records.

## B. The Tennessee Facility



In April 1998, **TRADEBE Treatment and Recycling of Tennessee, LLC** (formerly known as Pollution Control Industries of Tennessee) commenced operations in Millington, Tennessee. The 36 acre facility was purchased from Waste Management. The operations and administrative buildings on the site were constructed in 1993. The developed portion of the facility served primarily as a transfer station for Chemical Waste Management. Based on a Phase I and Phase II audit conducted prior to transfer to TRADEBE, the site has no known environmental contamination.

The Tennessee's Part B Permit was renewed for 10 years in October 2010. The facility is regulated by the Tennessee Department of Environment and Conservation (TDEC) and is zoned for heavy industry. TRADEBE is permitted to store up to 9,748 "55-gallon drum equivalents" on site.

The Memphis permit operational capacities allow this site to accept and process the same types and similar quantities of waste that are handled at the East Chicago, Indiana facility. The Memphis facility operations include a single stage shredding tower capable of handling 450 drums per day of hazardous waste, an 80,000 gallon tank farm, a stabilization process for hazardous wastes and a solidification process for non hazardous wastes. In addition to processing areas, the Memphis facility features a well equipped laboratory, receiving and loading docks, and buildings for indoor storage.