

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/de-pack 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 customer service and some administrative 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.

C. The Meriden, CT Facility

In April 2011, Tradebe Environmental Services, LLC acquired United Industrial Services, with facilities in New England and the state of New York. The Meriden, CT facility sits on 2.5 acres and has been treating and storing used oil, hazardous waste, hazardous and non-hazardous waste water and containerized solid and liquid wastes since 1976. Up until 1976, the property was used as a commercial greenhouse and florist shop, as well as residence for the owners. In 1976, the owners began transporting, storing and burning waste oil. The waste oil was burned in the on-site boiler to heat the greenhouses. The owners formed United Waste Oil Company and began transporting and

storing waste oil for the other town businesses. The company grew to the point where wastewater treatment was brought on-site and waste oils classified as hazardous waste codes were being accepted. The facility filed its first RCRA Part A application in 1980. United received its first RCRA Part B permit in September 1995. The greenhouse and florist business was terminated in 1988.

D. The Bridgeport, CT Facility

The Bridgeport facility sits on 3.5 acres and has been treating and storing used oil, hazardous waste fuels, hazardous and non-hazardous wastewater and containerized liquid and solid waste since 1993. This facility operates a non-hazardous mix pit where solids and semi-solids can be solidified with materials such as sawdust and then transferred to a roll-off. Several types of waste streams are stored and treated in Bridgeport. Waste streams that are not treatable on-site are transported to a facility that can manage them.

E. The Stoughton, MA Facility

This Facility is centrally located in Stoughton, MA about 25 miles east of Boston, MA and sits on 2.5 acres. This facility is a RCRA Part B facility and holds an MWRA Wastewater Discharge Permit. The total tank storage capacity is 221,279 gallons, and had both drum and bulk liquid off-loading and storage capabilities.

F. The Northborough, MA Facility

The Northborough facility has a RCRA Part B permit, however, it is currently and idle facility.

G. The Cohoes, NY Facility – Norlite, a subsidiary of Tradebe Treatment and Recycling, LLC

Mother Nature determined Norlite's location by depositing an easily accessible stratum of high quality shale on this location, approximately 450 million years ago. Known as Snake River Shale, Norlite's portion of this deposit is approximately 100 acres of pure shale, devoid of sandstone, quartz of lime. When heated, this shale uniformly expands to produce a high quality lightweight aggregate. Expanded shale from this deposit is in high demand by the construction industry based upon its strength, low bulk density and uniformity.



Norlite also stores and treats organic hazardous waste on this site, using solvent, chemical and oil wastes as low grade fuel (LGF) for the production of light weight aggregate in two dry process rotary kilns. Each kiln is fired with natural gas, oil, or low grade fuel. The air pollution control system on each kiln is comprised of four primary components – Multiple Stage Cyclone; Heat Exchanger; Fabric Filter Media Baghouse; Wet Scrubber.

The neighboring areas for Norlite consist of residential areas to the north and east, light commercial directly south with vacant land to the south and west of the facility. The buffer zone from the site's property lines to the operation areas varies from 500 feet to 1 mile.

Examples of construction applications for Norlite include:



Building material for the Basketball Hall of Fame



Planting media for the World Trade Center Memorial in NYC



Building material for the Triborough Bridge



Construction material for the Comcast Building