



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

BOB MARTINEZ CENTER
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANERA
LT. GOVERNOR

JONATHAN P. STEVERSON
SECRETARY

03/02/2015

Lindsay Ferguson
American Transportation Solutions LLC
310 Seven Fields Blvd Ste 210
Seven Fields, PA 16046-

The Florida Department of Environmental Protection has reviewed your application for registration as a transporter or handler for universal waste lamps and devices destined for recycling. Based on the information received, the facility located at **1000 Imperial Industrial Park, Oakdale, PA 15071** has been registered through **March 1, 2016** with the following status:

Facility ID # **PAR000521740**
Transporter of Universal Waste Lamps and Devices

The registration form for the year **2016** will be sent to the contact person on your application.

Chapter 62-737, Florida Administrative Code (F.A.C.), (copy enclosed) specifies several other requirements including packaging, training and record keeping for transporters and handlers of universal waste lamps or devices destined for recycling. These requirements are simple, flexible and make good business and environmental sense (summarized on enclosed fact sheets).

This registration does not allow you to transport or handle universal waste lamps or devices which are destined for landfill or other disposal. The transportation or handling of universal waste lamps or devices destined for disposal is subject to our hazardous waste management regulations under Chapter 62-730, F.A.C.

If any of your facility's information on the Florida Notification of Regulated Waste Activity [form 62-730.900(1)(b)] changes, please notify the Department using that form. I can also be contacted at (850) 245-8759 or at Laurie.Tenace@dep.state.fl.us.

Sincerely,

Laurie Tenace
Environmental Specialist
Waste Reduction Section

Enclosures



8700-12FL - FLORIDA NOTIFICATION OF REGULATED WASTE ACTIVITY

DEP Waste Management Division-HWRS, MS4560

2600 Blair Stone Rd. Tallahassee, FL 32399-2400

(850) 245-8707

RECEIVED
EX-100-DEP-010103-001
(For DEP Official Use Only)

FEB 23 2015

PERMITTING & COMPLIANCE
ASSISTANCE PROGRAM

EPA ID: P A R 0 0 0 5 2 1 7 4 0

Please use the instructions document to complete this form

1. Reason for Submittal

(all submitters must complete pages 1 and 2 and sign page 5.

Pages 3 and 4, - complete as applicable)

Mark 'X' in the correct box:

(must choose one if a notification)

☐ To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, used oil activities, or PCW activities).

☒ To provide subsequent notification (to update status and facility identification information).

☐ To provide the final notification (closing) for the facility. (see instructions—must complete pages 1,2,5)

FL Registration(s)

☒ UW Mercury (see page 3)

☒ HW Transporter (see page 4)

☐ Used Oil (see page 4)

2. Facility or Business Name

AES Asset Acquisition Corporation d.b.a. American Transportation Solutions, LLC (ATS)

3. Facility Operator

(List additional Operators in the comments section).

Name of Operator:

AES Asset Acquisition Corporation d.b.a. American Transportation Solutions, LLC (ATS)

Date became Operator: ____/____/____

☐ New Operator mm dd yy

Street or P.O. Box:

310 Seven Fields Blvd, Suite 210

Phone Number:

(724)933-4100

City or Town:

Seven Fields

State:

PA

Zip Code:

16046

Country (if not USA):

Operator Type:

☒ Private

☐ Federal

☐ Municipal

☐ State

☐ County

☐ Other

4. Facility Physical Location Information

☐ Same address as #3 above or:

Physical Street Address:

1000 Imperial Industrial Park

☐ Vessel

City or Town:

Oakdale

State:

PA

Zip Code:

15143

County:

Allegheny

Country (if not USA):

5. Facility North American Industry Classification System (NAICS) Code(s) (at least 5 digits)

A. 5 6 2 1 1 2 (required)

B. _____

C. _____

D. _____

6. Facility or Business Mailing Address

☒ Same address as #3 above or: Street or P.O. Box:

City or Town:

State:

Zip/Postal Code:

Country (if not USA):

7. Facility or Business RCRA Contact Person

First Name:

Lindsay

Last Name:

Ferguson

Title:

Environmental Health & Safety Manager

Phone Number:

(724) 933-4100

Extension:

246

E-Mail:

Lindsay.ferguson@americanenviro.com

Fax:

(724) 933-4110

Street or P.O. Box:

☒ Same address as #3 above or:

City or Town:

State:

Zip Code:

Country (if not USA):

8. Real Property (FL Land) Owner of the Facility's Physical Location

(List additional owners in the comments section.)

☐ Same address as #__ above or:

Name of Owner:

N/A Property not in Florida

Date became Owner: ____/____/____

☐ New Owner mm dd yy

Street or P.O. Box:

Phone Number:

City or Town:

State:

Zip Code:

Country (if not USA):

Owner Type:

☐ Private

☐ Federal

☐ Municipal

☐ State

☐ County

☐ Other

9. RCRA Hazardous Waste Activities at this Facility: (Mark 'X' in all that apply):**(A) (1) Generator of Hazardous Waste**

For Items 2 through 7, mark 'X' in all that apply.

☐ Yes ☒ No (Do not include Universal Waste or Used Oil)

If YES. Choose only one of the following three categories.

☐ **a. Large Quantity Generator (LQG):**

Generates in any calendar month 1,000 kilograms or greater per month (kg/mo) (2,200 lbs.) of non-acute hazardous waste; or Greater than 1 kg (2.2 lbs) of acute hazardous waste (at least once a year)

☐ **b. Small Quantity Generator (SQG):**

Generates in any calendar month greater than 100kg/mo but less than 1,000 kg/mo (>220 to <2,200 lbs.) of non-acute hazardous waste and/or 1 kg (2.2 lbs) or less of acute hazardous waste (at least once a year)

☐ **c. Conditionally Exempt SQG (CESQG):**

Generates in any calendar month 100 kg/mo or less (220 lbs.) of non-acute hazardous waste and 1 kg (2.2 lbs) or less of acute hazardous waste

In addition, indicate other generator activities that apply.

- ☐ d. Short-Term Generator (one-time, not on-going)
- ☐ e. Episodic: Not more than one-time per year: __ SQG __ LQG
- ☐ f. United States Importer of hazardous waste
- ☐ g. Mixed Waste (hazardous and radioactive) Generator

(2) Treater, Storer, or Disposer of Hazardous Waste

(at your facility) Note: A hazardous waste permit may be required for this activity.

- ☐ a. Operating Commercial TSD
- ☐ b. Operating Non-Commercial TSD
- ☐ c. Non-Operating: Postclosure or Corrective Action Permit or Order (HSWA, etc.)

(3) ☐ Recycler of Hazardous Waste (at your facility)Specify: ☐ Commercial ☐ Non-Commercial.

Note: A permit is required for storage prior to recycling.

(4) ☐ Exempt Boiler and/or Industrial Furnace

- ☐ a. Small Quantity On-site Burner Exemption
- ☐ b. Smelting, Melting, and Refining Furnace Exemption

(5) ☐ Person Authorized to Manage Conditionally Exempt Waste Generated at Other Facilities

Choose this management activity ONLY if you attach EITHER a copy of your application for such authorization OR the authorization you received from FDEP.

(6) ☐ Receives Hazardous Waste from Off-Site**(7) ☐ Underground Injection Control****10. Waste Codes for Federally Regulated Hazardous Wastes:** List the waste codes of the Federal hazardous wastes handled at your facility. List them in the order they are presented in the regulations (e.g., D001, D003, F007, K019, P012, U112).

Hazardous waste transporters list codes routinely or usually transported. Use comments or an additional page if more spaces are needed.

¹ All D	² All F	³ All U	⁴ All P	⁵ All K	⁶	⁷
⁸	⁹	¹⁰	¹¹	¹²	¹³	¹⁴
¹⁵	¹⁶	¹⁷	¹⁸	¹⁹	²⁰	²¹

11. Other Status Changes (If no longer handling waste or closed, sections 9 and 10 should be blank and skip Section 12-16):**(A) Non-Handler of Regulated Waste at This Facility** (Sections 9, 10 and 12-16 should be blank.)

- ☐
- (1) Business no longer generates, transports, treats, stores, disposes of, or otherwise handles any regulated waste.

(B) Facility Closed (Complete this section only if all business activities at this facility have ceased.)

- ☐ (1) Closed at this location and moved or moving to another - Submit a new Form 8700-12FL for the new location if you will
- ☐ (2) Out of Business - Business closed on _____ (date)

☐ **(C) Property Tax Default**☐ **(D) Petition for Bankruptcy Protection****12-14 — Registration Activities Contact Information** (only if this submission is a registration or registration information update):

<input type="checkbox"/> Same as Facility RCRA Contact on page 1 or enter: Contact for: <input checked="" type="checkbox"/> HW Transporter <input type="checkbox"/> Used Oil Handler <input type="checkbox"/> Universal Waste	First Name: Lindsay		Last Name: Ferguson		Title: Environmental Health & Safety Manager
	Phone Number: (724)933-4100		Extension: 246	E-Mail: Lindsay.ferguson@americanenviro.com	
	Street or P.O. Box: 310 Seven Fields Blvd. Suite 210				
	City or Town: Seven Fields		State:(Country): PA	Zip Code: 16046	

12. Universal Waste (UW) Activities (Mark 'X' and complete all that apply) :

A. Federal Notification

- ☒ **Federally Defined Large Quantity Handler (LQH) = Generate/Accumulate: 5,000 kg (11,000 lb) or more of any combination of UW accumulated (at any one time)**
- Accumulates: ☒ **a. UW Batteries** ☐ **b. Pesticides** ☐ **c. Pharmaceuticals**
- ☒ **d. Mercury Containing Devices** ☒ **e. Mercury Containing Lamps**
- ☐ **Destination Facility for UW** Note: For this activity, a facility must treat, dispose or recycle a UW. A permit is required for storage prior to recycling.

B. Florida Universal Pharmaceutical Waste (UPW): one-time registration

- ☐ Pharmaceuticals **LQH** = 5,000 kg or more of Universal Pharmaceutical Waste (UPW) accumulated (at any one time)
- ☐ Pharmaceuticals **Acute LQH** = more than 1 kg (2.2 lb) of acutely hazardous ("P-listed") pharmaceutical waste (UPW) accumulated
- ☐ **Reverse Distributor** of Universal Pharmaceutical Waste (UPW) (must be registered with the Florida Department of Health [DOH])
- ☐ Florida Universal Pharmaceutical Waste (UPW) Transporter

C. Florida Annual Mercury Handler Registration:

For-hire transporters, transfer facilities, handlers, reclamation and recovery facilities of Mercury-Containing Lamps and Devices operating in the State of Florida are required to register annually with the Department using this section of the form [Chapter 62-737, F.A.C.]. A one-time fee of \$1,000 is required for first time registration as a Large Quantity for-hire Handler of Mercury-Containing Lamps and Devices as detailed in 62-737.400(3)(a)3. (please contact FDEP first).

If you only generate lamps and/or devices or manage pharmaceuticals, do not register or complete the information below.

(1) This form is being submitted as a Florida Registration of Universal Waste Transporter/Handler for-hire Activities

- ☐ First time registering ☒ **Renewal** ☐ One-time \$1,000 fee for Mercury for-hire first time LQH registration is attached

- ☒ **For-hire Transporter** of Universal Waste Mercury-Containing Lamps or Devices
- ☐ **For-hire Transfer Facility** of Universal Waste Mercury-Containing Lamps or Devices
- ☐ Mercury-Containing Devices (thermostats, etc) **SQH** = less than 100 kg accumulated by for-hire handler
- ☐ Mercury-Containing Lamps **SQH** = less than 2,000 kg (8,000 lamps) accumulated by for-hire handler

Annual
Registration
Required

- ☐ Mercury-Containing Devices **LQH** = 100 kg (220 lb) or more accumulated at any one time by for-hire handler
- ☐ Mercury-Containing Lamps **LQH** = 2,000 kg (4400 lbs/8,000 lamps) or more accumulated by for-hire handler

Annual Registration +
one-time \$1,000 fee+
More Requirements
(contact FDEP)

(2) Mercury Recovery and/or Reclamation Facility (A hazardous waste permit is required for this activity)

- ☐ First time registering ☐ **Renewal**

Annual Registration
Required

Briefly Describe your Universal Waste Activities:

☐ We use Drum Top Bulb Crusher(s).

13. Other State Regulated Waste Activities: Petroleum Contact Water (PCW) ☐ Recovery ☐ Transport [62-740 F.A.C.]

Note: A water facility permit may be required for this activity. An annual report is required for a recovery facility pursuant to Rule [62-740.300(5)]

14. HW Transporter Activities: (Mark 'X' and complete all that apply if you need to register your HW Transporter activities)

Transporters of and Transfer Facilities for Hazardous Waste in the State of Florida are required to register and annually renew their registration. Evidence of casualty/liability insurance pursuant to 62-730.170(2)(a) is required in addition to this registration. Transfer facilities must submit several additional documents as detailed on page 5 the first time they register and when the information changes. Registered transporters and transfer facilities may only begin operations after receiving approval from the Department. **Generators of hazardous waste who transport waste only within the boundaries of their facility should not register.**

A. HW Transporter Registration Information (must be completed annually and when this information changes)

This facility is a registered transporter of hazardous waste.

This form is: ☐ Initial Registration ☒ Renewal ☐ Notification of changes ☐ Cancel Registration

☐ 1. For own waste only ☒ 2. For commercial purposes ☐ 3. Both commercial and own waste

4. Transportation Mode ☐ Air ☐ Rail ☒ Highway ☐ Water ☐ Other - specify _____

B. HW Transfer Facility Registration Information (must be completed annually and when this information changes)

☐ **This facility is a Hazardous Waste Transfer Facility: (at this location)** Storage Volume _____

This form is: ☐ Initial Registration ☐ Renewal ☐ Notification of changes ☐ Cancel Registration

Note: Hazardous Waste transfer facilities must comply with the requirements of Rule 62-730.171, F.A.C., and Rule 62-730.182, F.A.C.

The Transfer Facility records required under the provisions of Rule 62-730.171(6), F.A.C., are kept at (check one):

☐ Our mailing (business) address ☐ The site (facility) address

Please enter the EPA ID Number of the HW Transporter who carries the insurance for this Transfer Facility:

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Please see the top of page 5 for additional items that must be submitted in addition to the above registration for Hazardous Waste Transfer Facilities [Rule 62-730.171(3), Florida Administrative Code (F.A.C.)]:

15. Used Oil and Oil Filter Activities: : (Mark 'X' and complete all that apply if you need to register your used oil activities),

Transporters (exemptions in 40 CFR 279.40(a)(1-4), transfer facilities, processors, off-specification burners, and/or marketers must annually register with the Department using this form. All except Florida used oil (UO) Processors and collection centers must pay an annual \$100 registration fee.

This form is: ☐ Initial Registration ☐ Renewal ☐ Notification of changes ☐ Cancel Registration

☐ If applicable, a check or money order, in the amount of \$100, payable to Florida Department of Environmental Protection is enclosed.

(1) Used Oil Transporter - mark activities: (occurring in Florida)

- ☐ a. Transporter (off-site) and noncontiguous locations
☐ b. Transfer Facility

(2) ☐ Collection Center (From businesses, no more than 55 gal per shipment)

(3) ☐ Used Oil Processor (A permit is required.)

(4) ☐ Off-Specification Used Oil Burner

(5) Used Oil Fuel Marketer ☐ On-Spec ☐ Off-Spec

(6) Used Oil Filter Management (must annually register)

- ☐ a. Transporter
☐ b. Transfer Facility
☐ c. Processor (Annual Report Required)
☐ d. End User

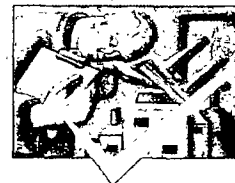
(7) The records required under the provisions of Rule 62-710.510, FAC, are kept at (check one):
☐ Our mailing (business) address ☐ The site (facility) address

Please see the top of page 5 for additional items that must be submitted in addition to the above registration and fees required for non-exempt Used Oil Transporters.



COMPLIANCE PLUS SERVICES

February 20, 2015



Via UPS Overnight

Florida Department of Environmental Protection
Waste Management Division – HWRS, MS4560
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Submission of Florida Notification of Regulated Waste Activity (Form 8700-12FL) for the Renewal the Universal and Hazardous Waste Transporter Permit and Notification of a Planned Acquisition of American Transportation Solutions, Inc. ("ATS"), 310 Seven Fields Blvd, Suite 210, Seven Fields, PA; Hazardous Waste Transporter Permit No. PAR000521740

Dear Sir/Madame:

Compliance Plus Services, Inc. ("CPS") is submitting this permit renewal request to the Department, on behalf of our client, American Transportation Solutions, Inc., for the renewal of the Hazardous Waste and Universal Waste Transporter Permit, specifically the Universal Permit which expires March 1, 2015. Please note that we are currently working with our insurance carrier on the completion of State of Florida Hazardous Waste Transporter Liability Endorsement Form No. 62-730.900(5)(b). Unfortunately, this Form is still in the process of being completed and will be submitted to the Department under separate cover. Along with the permit renewal request, note that ATS' mailing address (as indicated on the Form) has also changed to 310 Seven Fields Blvd, Suite 210, Seven Fields, PA.

We are also notifying the Department of a change in ownership and control of their permitted transportation fleet as a result of an acquisition of the Company by Clean Earth, Inc. Clean Earth is seeking to acquire the real property, equipment and operating permits of AES through a newly formed subsidiary, AES Asset Acquisition Corporation, d.b.a. American Transportation Solutions, LLC ("New ATS"). Pursuant to this transaction, we are providing the enclosed the Florida Notification of Regulated Waste Activity Form (8700-12FL) required to transfer ownership of ATS' existing Hazardous and Universal Waste Transporter Permit to the New ATS entity. Accordingly, we are requesting an expedited review of the information provided to allow this transaction to conclude.

This planned acquisition of the ATS operation by New ATS will not result in any changes to the existing operations. Additionally, no significant changes are planned related to current personnel and the existing operating team. Provided with this letter, as Exhibit I, is an insurance certificate listing the Florida Department of Environmental Protection as a certificate holder.

www.CPS-2Comply.com

Premier Industry Provider of Environmental and Safety Services

P.O. Box 186

Hatboro, PA 19040

Ph: 215-734-1414 Fax: 215-734-1424

1-866-976-PLUS (7587)

Florida Department of Environmental Protection
Waste Management Division – HWRS, MS4560
February 20, 2015
Page 2 of 2

If you have any questions or comments related to this notification or the transaction, please do not hesitate to contact me at 215.734.1414 or electronically at mzollo@cps-2comply.com.

Sincerely,

A handwritten signature in black ink, reading "Madeline Zollo". The signature is fluid and cursive, with the first name "Madeline" and last name "Zollo" clearly distinguishable.

Madeline Zollo
Regulatory Compliance Specialist
Compliance Plus Services, Inc.
Corporate Consultant to the Clean Earth Companies

Enclosure

cc: Averil Rance, Clean Earth, Inc.

N:\LETTERS\5100-5199\5136 - CEI ATS Florida HW Transporter Permit.docx