

# Contingency Plan 10 – Day Hazardous Waste Transfer Facility

This plan is reviewed annually and amended whenever changes occur that will significantly affect the ability of this facility to respond to an emergency situation. This includes revision of the regulations, if the plan fails in an emergency, if this facility changes in a way that materially increases the potential for an emergency or changes in the response necessary in an emergency, if the list of emergency coordinators changes or if the list of emergency equipment changes. When warranted, revisions are made to the plan within 24 hours.

A copy of the contingency plan and all revisions to the plan will be maintained at the facility and immediately accessible

August 2019



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#### **General Facility Information**

Facility Name: Daniels Sharpsmart, Inc. (Daniels)
Physical Address: 10705 Rocket Blvd. Suite 111 Orlando, FL 32824
Mailing Address: 111 W. Jackson Blvd. Suite 1900 Chicago, IL 60601
Facility Contact: Charles Rivera, Operations Manager
Contact #: 407-663-9959
Email: Charles.Rivera@danielshealth.com
Alternate Facility Contact: Grayson Wickard, Operations Supervisor
Contact #: 407-276-5824
Email: GWickard@danielshealth.com

#### Purpose and Scope of Plan

Although this facility is designed, constructed, maintained and operated in a manner that minimizes the possibility for emergency incidents such as fire, explosions and any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water, this plan is designed to minimize hazards to human health and the environment in the unlikely event of such incidents. This plan is designed to satisfy the requirements of 40 C.F.R. Part 265 Subpart D Contingency Plan and Emergency Procedures.

This plan will be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste which could threaten human health or the environment.

#### **Overview of Facility Operations**

In accordance with 62-730.170(1), F.A.C., Daniels operates as a transporter who stores manifested hazardous waste in proper containers at a transfer facility for 10 days or less.

Hazardous waste generated by healthcare facilities are properly packaged, marked, and labelled, then transported to the Daniels Orlando, FL 10-day hazardous waste transfer facility for storage. Containers are off-loaded, processed, then stored in a designated area for 10 – days or less before transfer off-site to a Treatment, Storage, Disposal Facility (TSDF). No wastes are opened or decanted at any time.

#### Hazardous Waste Transported/Transferred

Daniels works with healthcare waste generators to properly determine if a given waste material is classified as hazardous. Once the waste determination has been made, the generator will properly complete a waste profile form for pickup. This form essentially lists out all the chemical properties of a particular type of waste.



Before any hazardous waste is transported and subsequently transferred by Daniels Sharpsmart, Inc., the generator of the waste is responsible to create this form prior to shipment. Daniels will ensure the TSDF, to even accept a shipment, will have received this paperwork in advance.

The form details specifics about the waste, such as:

- Its chemical composition
- Whether it's a liquid, sludge, or solid.
- If it has any discernible odor.
- Its DOT description.
- Its flash point (if relevant).
- Its EPA hazardous waste code.

#### Waste Codes

Daniels Sharpsmart, Inc. intends to transport and transfer the following waste codes including, but not limited to:

- Flammable Liquids
  - U002,U019,U037,U057,U108,U112, U154,U159,U161,U196,U220,U239,D001,D018,D035,D038, F003,D001
- Oxidizers
  - o D001, D002, D011
- Corrosives
  - o D002, D009, U134, D002
- Environmentally Hazardous
  - o D008, D009

#### US DOT Hazard Classes

Category of Material (Hazard Class or Division Number and Additional	
Description, as appropriate)	Name
2.1	Flammable Gas
2.2	Non-Flammable Gas
3	Flammable
Combustible Liquid	Combustible
4.1	Flammable Solid
4.2	Spontaneously Combustible
5.1	Oxidizer
5.2	Organic Peroxide
6.1 (other than material poisonous by inhalation	Poison
6.2 (Regulated Medical Waste)	None
8	Corrosive
9	Misc.



#### **Emergency Response Coordinator**

At all times, there must be at least one employee either on the facility premises or on-call to respond to an emergency by coordinating all emergency response measures.

Please refer to *Appendix A – List of Emergency Response Team Members* for a list of names, titles and phone numbers of all persons qualified to act as emergency coordinator. In an emergency, the individuals should be contacted in the order shown.

#### **Emergency Procedures and Responsibilities**

The Emergency Response Coordinator (or alternate) has full authority to commit resources needed to respond to emergencies at this facility and to direct other trained employees to assist in the implementation of this contingency plan.

Whenever there is an imminent or actual emergency situation, the emergency coordinator (or alternate) must immediately:

- 1. Activate internal facility alarms or communication systems, where applicable;
- 2. Ensure all facility personnel are notified and evacuated, if necessary;
- 3. Take any action deemed safe to put out fires, contain spills, or prevent the release of hazardous material; and
- 4. Notify appropriate local responders by dialing 9-1-1 in addition to other appropriate Local and State emergency contacts.

Whenever there is a release, fire, or explosion, the emergency coordinator must immediately identify the character, exact source, amount, and areal extent of any released materials. He may do this by observation, review labeling, or review of facility records or manifests.

The emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers. Adequate control measures, such as applying absorbent materials to a spill, constructing dikes or dams to prevent material from entering drainage systems or waterways, covering drains, etc., should be implemented by appropriate trained site personnel. Emergency equipment shall be used such as a Fire Extinguisher or Spill Kit if necessary.

The Emergency Coordinator must immediately notify the appropriate response agencies such as the local fire company, police, ambulance/hospital, Florida State Warning Point, Chemtrec, etc., depending on the nature and magnitude of the emergency.

Concurrently, the emergency coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release,



fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat-induced explosions).

If the emergency coordinator determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside the facility, he must report his findings as follows:

- If his assessment indicates that evacuation of local areas may be advisable, he must immediately notify appropriate local authorities. He must be available to help appropriate officials decide whether local areas should be evacuated; and
- 2. He must immediately notify either the government official designated as the on-scene coordinator for that geographical area, or the National Response Center (using their 24-hour toll free number 800/424-8802). The report must include:
  - a. Name and telephone number of reporter;
  - b. Name and address of facility;
  - c. Time and type of incident (e.g., release, fire);
  - d. Name and quantity of material(s) involved, to the extent known;
  - e. The extent of injuries, if any; and
  - f. The possible hazards to human health, or the environment, outside the facility.

If the facility stops operations in response to a fire, explosion or release, the emergency coordinator must monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility. The emergency coordinator must ensure that, in the affected area(s) of the facility:

- 1. No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed;
- 2. All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed; and
- 3. The material is properly transported to a permitted treatment, storage, and/or disposal (TSD) facility.

The owner or operator must note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, he must submit a written report on the incident to the Regional Administrator. The report must include:

- a. Name, address, and telephone number of the owner or operator;
- b. Name, address, and telephone number of the facility;
- c. Date, time, and type of incident (e.g., fire, explosion);
- d. Name and quantity of material(s) involved;



- e. The extent of injuries, if any;
- f. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- g. Estimated quantity and disposition of recovered material that resulted from the incident.

#### Please refer to Appendix B – List and Location of Emergency Equipment

#### **Emergency Response Arrangements & Contacts**

Advanced arrangements for local emergency services have been determined not necessary. Should an emergency occur, the emergency coordinator is to dial 911.

Daniels has an agreement with **Chemtrec** for 24/7 Emergency Hazmat Incident Response Services. After an incident occurs involving a hazardous material, such as a spill, leak, fire, exposure, or accident, Chemtrec is dialled in the appropriate order. Chemtrec receives the phone call then gathers information including: Caller Information, Name, Location, Caller's Organization, Incident Details, Product Information, Origin of Shipment, Shipper, and Conditions at Scene.

Chemtrec provides information to the caller including: Product & Hazard Information, ERG & SD, and Mitigation / Containment Procedures.

Chemtrec also connects key resources including: Medical professionals/toxicologists, and mutual aid resources. Additionally, it also notifies registrant of the emergency contacts and incident report.

Daniels also has an agreement with **Medcor** 24/7 Injury Triage Nurse Services for (non – emergency) care should an injury or exposure occur to a Daniels employee. If an employee becomes ill or injured at work, the 24/7 phone number is dialled where trained nurses triage the employee, recommend how and where to treat/seek care, and generate a report sent to the emergency coordinator.

Should an incident occur involving an uncontrollable spill, leak, fire, exposure, or accident, the following should be called in order:

- 1. Appropriate emergency response Dial 911
  - a. For non emergency illness or injury Medcor Dial 800-775-5866
- 2. Daniels Compliance & Safety Dial 312-515-8912, Alan Larosee Director of Compliance
- 3. Florida State Warning Point Dial 800-320-0519
- 4. Chemtrec 800-424-9300
- 5. FLDEP Central District 407-897-4100

Please see the next page for Emergency Response Contacts & Phone Numbers



#### **Emergency Response Phone Numbers**

Primary Response Agency	Name & Address	Description of Assistance	How to Contact in an
			Emergency
Fire (facility located within	Orange County Fire Station #73	Fire protection	Dial 911
established fire protection	811 1st St.		
district)	Orlando, FL 32824		
Police	Orlando Police Dept.	Law enforcement, public safety,	Dial 911
	1250 South St.	serve and protect	
	Orlando, FL 32805		
Ambulance/Hospital	Advent Health/Florida Hospital	Emergency health services	Dial 911
	2450 N Orange Blossom Trail		
	Kissimmee, FL 34744		
Injury Triage (non-emergency)	Medcor 24/7 Injury Triage	If ill or injured at work will	Dial 800-775-5866
		recommends the best course of	
		action + reporting notification	
Florida State Warning Point	Florida State Warning Point	Call to report a spill	Dial 800-320-0519
Chemtrec (Emergency Hazmat	Chemtrec 24/7 Emergency Hazmat	• Spill, leak, fire, exposure,	Dial 800-424-9300
Incident Response Services)	Incident Response	accident occurs	
		Gathers information	
		Provides information	
		Connects key recourse	
		Notifies registrant	
National Response Center	National Response Center	Call to report a spill. List of	Dial 800-424-8802
-		contractors to clean up a spill	
FL DEP	FLDEP Central District	Department of Environmental	Dial 407-897-4100
		Protection	
FL DEP	FLDEP Tallahassee	Department of Environmental	Dial 850-245-2036
	3900 Commonwealth Blvd.	Protection	Emergency Response
	Tallahassee, FL 32399		Dial 850-245-2010
Industrial Wastewater	Orange County Utilities	Notify if discharge into water/sewer	Dial 407-254-7701
Control/POTW			
OSHA (Dept. of Labor)	Tampa Area Office	Workplace safety, injury/exposure	Dial 800-321-6742 or local
	5807 Breckenridge Parkway, Suite	notification	954-424-0242
	A		
	Tampa, FL 33610-4249		
Department of Transportation	133 S Semoran Blvd, Orlando, FL	Hazmat information assistance	Dial 202-366-4000 or
(DOT)	32807		regional contact
Poison Control	Florida Poison Information Center -	Poisoning assistance, unknown	Dial 800-222-1222
	Tampa	pharmaceuticals, accidental	
	Tampa General Hospital	indigestion	
	PO Box 1289		
	Tampa, FL 33601-1289		
USEPA Region 4	61 Forsyth St SW # 9, Atlanta, GA	Environmental Protection	Dial 404-562-9900
	30303		



#### **Emergency Containment and Clean-up Procedures**

It is every employee's responsibility to assist in maintaining an environmental quality that will protect human health and the ecosystem. Should a spill occur, please always remember the following:

CONTAIN! SECURE! REPORT! CLEAN-UP! RESTORE!

All hazardous waste containers must be properly packaged before transport then secured safely on the Daniels vehicle. When delivered to the facility, all hazardous waste must be moved to the designated storage area away from traffic. All incompatibles shall be segregated, and all liquid hazardous waste must be stored on secondary containment.

All Daniels motor vehicles and facilities must always have an accessible spill kit. Spill kits must be placed in either the cab or freight box/trailer (if easily accessible during times of need) of the motor vehicle. Additionally, all facilities must have a spill kit immediately accessible for the 10 – day hazardous waste transfer area. Manifests shall also be available to identify the contents of the material should there be a spill.

Facility Spill Kit – Universal Drum Spill Kit 55 Gallon

- Nitrile safety gloves
- Safety glasses/goggles
- Shoe or boot covers
- Sorbents or absorbent pads enough for the largest volume of spill that might happen
- Disposal bags
- Shovel/broom/grabber tool and dustpan (nearby)

In the event of a hazardous waste spill, the individual(s) who caused/identified the spill is responsible to immediately contain the spill using the spill kit. All employees shall be notified, and the area secured to prevent staff from entering the spill area. Once the spill is contained and secured, the emergency coordinator shall be notified.

Should a hazardous waste spill occur, the following steps should be followed:

- 1. Notify surrounding personnel of the hazard
- 2. Restrict access to the area
- 3. Remove contents from the spill kit
- 4. Use appropriate personal protective equipment (PPE)
- 5. Contain the spill. Use the universal spill pads or plug to prevent hazardous materials from releasing into the environment, floor drains, etc.
  - a. Only contain the spill and/or stop the leak if it is possible and safe to do so. If not, evacuate to a safe distance.

- 6. Notification shall be made to the emergency coordinator of the incident. Information from the label of the container or manifest should be readily available for communication.
- 7. Further direction must be followed from the emergency coordinator. Should a spill not be able to be contained, Daniels will immediately notify the Hazardous Waste Spill Contractor
  - a. The emergency coordinator shall notify the Director of Compliance immediately
- 8. Incident Report Form completed
- 9. Spill kit must be replenished/replaced
- 10. All waste shall be properly re-packaged, and any incompatibles are segregated. Hazardous wastes shall be transported to a TSDF for proper disposal.
- 11. Proper reporting as mentioned in Emergency Response Contacts & Phone Numbers

Please refer to Daniels Sharpsmart, Inc. SOP 10-6001 Waste Spill Procedure V2 2020

#### **Emergency Fire Protection**

Should a Fire occur, the Emergency Coordinator or alternate should be notified immediately. If the fire is small and you have been trained to use the fire extinguisher, you may attempt to put the fire out. If you have not been trained to use the fire extinguisher or the fire is too large to extinguish, notify the emergency coordinator immediately.

The emergency coordinator will take the following steps

- 1. Activate internal facility alarms or communication systems to alert staff, where applicable;
- 2. Ensure all facility personnel are notified and at a safe location, evacuated if necessary;
- 3. Take any action deemed safe to put out the fire using a nearby fire extinguisher.
- 4. If the fire is not contained or uncontrollable notify appropriate local responders by dialing 9-1-1,
- 5. Do not re-enter the facility until the
  - a. The fire alarm has been silenced, and/or
  - b. The fire or police department has indicated that it is acceptable to re-enter.

#### **Fire Extinguishers**

The fire extinguishers around the facility have been strategically placed by potential hazard, size, and type. In most cases fire extinguishers should be located next to the main door of a room, near an exit door (i.e., a stairwell) or every 50' of a hazardous materials.

Fire extinguishers should <u>not</u> be located on the opposite side of the room away from your only means of egress. For health and safety reasons as required by OSHA, only persons who have been trained in the handling, selection, and use of a fire extinguisher shall operate them. The use of the wrong type of extinguisher could cause the fire to spread or the user to become seriously injured.



#### Types of Extinguishers

- Pressurized Water (P/W)- These are normally found where cloth, paper, and wood are the most common hazards. They are metallic colored and hold approximately 2 ½ gallons of water. They are capable of discharging a distance of 25' – 30' for approximately 1 minute.
- Dry Chemical (ABC) or (BC) These are normally found where gasoline, oil, and other combustible/flammable liquids are used. They are usually red in color and are capable of spraying 10' – 15' for approximately 30 seconds.
- Carbon Dioxide (CO2) These are normally found only in electrical or mechanical rooms where electricity is the hazard. They are used to put out electrical fires while the equipment is still energized. The carbon dioxide extinguishers are red in color, have no gauge to indicate amount of contents, and are limited to a spray distance of 5' – 10' for about 10 seconds.

#### **Injury or Exposure**

Please reference Daniels Sharpsmart, Inc. SOP 10-8004 Injury Reporting & Procedures V2 2020

#### **Facility Evacuation**

An audible alarm will be sounded in the event of an emergency requiring evacuation the building. The emergency coordinator will also vocally express concern of emergency and direction.

In the event of fire or other emergency, ALL employees shall evacuate immediately. Employees shall evacuate by means of the nearest available marked exit. Office personnel shall exit through the main entrance doors (if possible) or other appropriate exit and proceed to designated meeting point. The meeting point will be the Northwest corner of the employee parking lot East of Rocket Blvd.

The emergency coordinator will check all areas of the building to ensure no one remains inside the building. After the building evacuation is completed, the emergency coordinator must account for all onsite employees and visitors after evacuation. Roll call/attendance will be conducted and once it is safe to do so will give employees permission to return to their respective work area.

Critical operations shutdown procedures are not required, because no employees are authorized to delay evacuation for this purpose. No employees are assigned to perform medical or rescue duties during emergency evacuation situations

Please refer to Appendix C – Facility Map and Emergency Exits



## Appendix A - List of Emergency Response Team Members

Note: contact in order listed.

Name	Address	Phone (mobile)
Charles Rivera	10705 Rocket Blvd. Suite 111	407-663-9959
Operations Mgr.	Orlando, FL 32824	
Primary Emergency Response Coo	rdinator ( <b>Required</b> )	
Grayson Wickard	10705 Rocket Blvd. Suite 111	407-276-5824
Operations Supervisor	Orlando, FL 32824	
Alternate Emergency Response Co	ordinator 1	
Alan Larosee	111 W. Jackson Blvd. Suite 1900	312-515-8912
Director of Compliance	Chicago, IL 60604	
Compliance & Safety Contact 1		
Kyle Little	111 W. Jackson Blvd. Suite 1900	312-285-9087
Compliance Mgr.	Chicago, IL 60604	
Compliance & Safety Contact 2		

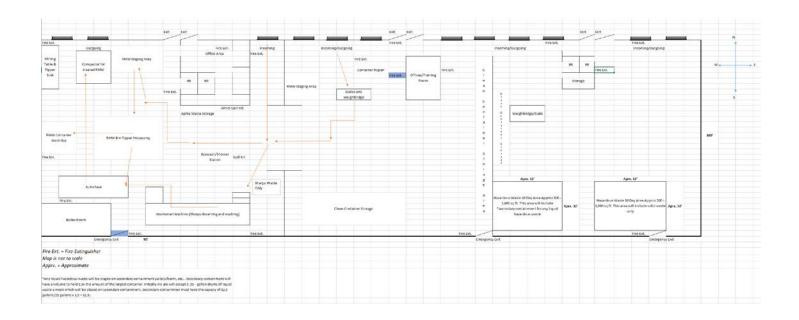


### Appendix B - List and Location of Emergency Equipment

This is an up-to-date list of all emergency response equipment at the facility. All equipment is tested and maintained as necessary to assure its proper operation in time of emergency. An extra sheet is attached if necessary.

Туре	Equipment	Location	Capability	Comments
	Available			
Safety and First	Chemical protective	Orlando plant operations	Single use	
Aid	gloves			
	Chemical protective	Provide for every Orlando	Everyday use	
	shoes/boots	employee		
	Safety glasses and	Provide for every Orlando	Everyday use	
	goggles	employee		
	First aid kit	Orlando plant	Everyday use	
	Plumbed eyewash	Outside supervisor office in	Available for use	
	fountain and/or shower	the Orlando plant	daily	
	SDS binder	Outside supervisor office in	Available for use	
		the Orlando plant	daily	
Fire Fighting	Portable fire extinguisher	Through the Orlando facility	Available for use daily	
	Fixed fire	Through the Orlando facility	Available for use	
	suppression system		daily	
	and/or sprinklers			
	Fire alarm boxes	Outside supervisor office in	Available for use	
		the Orlando plant	daily	
Spill Control and	All-in-one spill kit	Outside supervisor office in	Available for use	
Clean-Up	L	the Orlando plant	daily	
	Broom	Through the Orlando facility	Available for use daily	
	Shovel	Through the Orlando facility	Available for use	
	Shover	Through the Orlando facility	daily	
	Vacuum	Plant office	Available for use daily	
	Spill overpack	Plant	Available for use	1
	drums		daily	
 [				
Communications	Airhorn	Outside supervisor office in	Available for use	
and Alarm Systems		the Orlando plant	daily	
 [	Telephones	Orlando plant	Everyday use	
Other				

# Appendix C – Facility Map and Emergency Exits







#### **Attachments – Forms and Checklists**

Emergency Evacuation Drills Form – Completed every 6 months

Date: Location: Manager Name: Chief Warden:			Floor Warden 1:         Floor Warden 2"         CommunicationOfficer:         First Aid Officer:			
Chief Warden: EVACUATION SEQUENCE Alarm sounded Wardens responded Evacuation commenced Wardens check floor area Wardens report floor/area clear Personnel arrive at assembly Wardens check personnel Evacuation completed Exercise terminated ACTIONS & COMMENTS:		Personne Occupar Personne Effective Speed of Commun Familiari	First Aid Officer: ctiveness (tick one) el Response nt/Visitor Response el familiar with duties ness of procedures f evacuation nication during drill ty with protection udible in all areas	Satisfactory	Unsatisfactory	
MANAGER NAME & TITLE: SIGN:						



Weekly Hazardous Waste Transfer Facility Inspection Checklist

Date of	Time of	# of	Condition of	Date	Print Name	Signature
Inspection	Inspection	Containers	Containers	Corrected	of Inspector	of
				(if applicable)		Inspector



Contingency Plan Distribution Receipt - Advent/Florida Hospital

# Color C60 Transmission Report G3-ID Local Name Company Logo

G3-1D Local Name Company Logo	3125468950 DANIELS HEALTH						Date & '	Fime : 09/17/2018 11:22 AM Page : 1(Last Page)
			The job has Original Siz					
							Daniels	
	Fax					6885		
	To:	Florida Hospital – Kissin	nmee	Fax:	407 - 303 -			
	From:	Kyle Little, Compliance I		Date:	September	17, 2018		
	Re:	Daniels Sharpsmart, Inc Facility Emergency Plan	. Orlando	Pages:	49			
	Ce:							
	enclosed I We have i	For Review      Stantels Sharpsmart, I     srates a Regulated Mode     insfer Facility. At the requ     DSI Orlando Facility Ema     nocluded several processi     or need anything further,	rgoncy Plan. es and contact ini	Facility at sing and Tr partment of		et Blvd. Su I Universal Intal Protec		
	Thank you	ı.						
	M. 312-3 F 312-3	alth   USA Jackson Blvd, Suite 1900, C	hicago IL 60604					
		ealth   USA						
	A 111 W. Ja Suito 1900	ckson Blvd ), Chicago, IL 60604		2-546-8900 2-646-8950			www.danietsheaith.com USA@danietsheaith.com	
		1			1			
	emote Station	Start Date & Time	Duration	Pages	Pro	tocol	Contents	Status
1 2529 athen	a	9-17; 11:07 AM	14:59	50/50		EC	M	Completed



Contingency Plan Distribution Receipt - Orange County Fire Department

# 😳 Shipment Receipt

Transaction D	ate: 02 Jun 2020		Tracking	g Number:	1Z66A4X30299603878	
1 Addres	s Information					
Ship To:     Ship From:     Return Address:       ORANGE COUNTY FIRE     DANIELS SHARPSMART, INC.     DANIELS HEALTH       STATION #73     KYLE LITTLE     KYLE LITTLE       ADMINISTRATOR     111 W JACKSON BLVD     111 W JACKSON BLVD       S11 E FRST ST     SUITE 1900     SUITE 1900       ORLANDO FL 328249117     CHICAGO IL 60604     CHICAGO IL 60604						
2 Packag	e Information					
Weight		Dimensions / Pack	aging	Declared Value	Reference Numbers	
1. Letter (Letter bil	able)	UPS Letter			GL Code - 0082850137200	
3 UPS S	nipping Service and	Shipping Option	15			
Service:	UPS 2nd	Day Air				
Delivered By:	End of Da	ay Thursday, Jun 4, 2020				
Shipping Fees Su	ototal: 24,12 US	D				
Transporta	tion 23.76 US	D				
Fuel Surch	arge 0.36 US	D				