APPENDIX 7

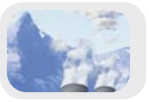
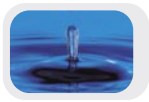
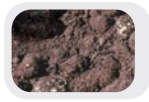
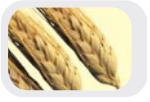
SEVERN TRENT LABORATORIES STATEMENT OF QUALIFICATIONS

Statement of Qualification

Vol. 1




SEVERN TRENT STL® Leaders in Environmental Testing

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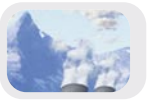
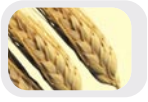


1. Introduction

Operations in the United States are conducted by Severn Trent Laboratories, Inc. (STL) and include; 31 environmental testing laboratories; 23 Service Centers; and a fleet of mobile laboratories. STL affiliates include the Aerotech P&K team (comprised of Aerotech Laboratories, Inc. and P&K Microbiology Services, Inc.), the leaders in indoor air quality; and QED Environmental Systems, Inc. the leading supplier of pumping systems and equipment used for environmental sampling, recovering contaminated ground water, controlling leachate and condensates at landfills.

Employing 2,300 people, STL has revenues in excess of $300M and offers the most extensive service package for the complete provision of environmental analysis.

1.1 Company

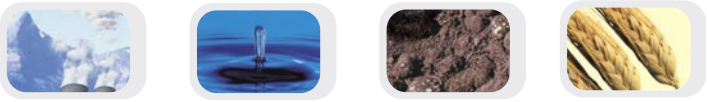
We know that every analysis performed at STL guides a decision about the water people drink, the air they breathe or the land on which they live.

STL's laboratories in the US have the combined experience of over 500 years in the environmental testing business. Through continued investment in facilities, equipment, methods and people, STL has developed an unprecedented team of resources, experience and capabilities.

QED Environmental Systems, Inc. is the recognized worldwide leader in the development and supply of sampling and remediation pumping systems for use at landfills and ground water contamination sites. QED has a successful record of introducing innovative methods and equipment to reduce client costs while improving sampling and remediation effectiveness. One prominent example of this leadership role is the growing global adoption of low-flow ground water sampling practices led by QED and its MicroPurge brand of pumps and controls. Another example in the sampling domain is the growing popularity of QED's Sample Pro portable sampling system with disposable wetted components to improve the efficiency and purity of on-site sample collection operations. QED's remediation pumping systems play a similar innovative role at landfills and ground water remediation sites that require the removal of highly contaminated liquids under a wide range of very difficult conditions. Developing better tools for environmental care is QED's charter.

Aerotech P&K When Severn Trent brought together the capabilities of P&K Microbiology Services Inc., an internationally recognized pioneer in indoor environmental microbiology, with the largest provider of indoor air quality testing, Aerotech Laboratories Inc., the most formidable team in the indoor air quality market was created.

The Aerotech P&K team provides its customers with internationally recognized expertise in IAQ testing, training and equipment provision. The diversified customer base includes government agencies, private institutions, health professionals, manufacturers and environmental consultants. Aerotech P&K's range covers industrial hygiene, consumer products, food safety, pharmaceutical, biological warfare agents, media cultures and medical devices.



2. Offerings

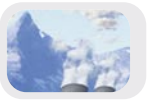
STL's testing capabilities include chemical, physical and biological analyses of a variety of matrices, including aqueous, solid, drinking water, waste, tissue, air, mold and saline/estuarine samples. Specialty capabilities include air toxics testing, mixed waste testing, tissue preparation and analysis, aquatic toxicology, dioxin/furan testing, indoor air quality and microscopy. Analyses is performed under the guidance of various regulatory programs, following validated published laboratory developed methods.

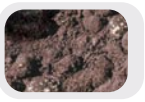
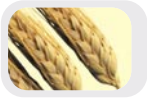
2.1 Broad range of testing services

- Low-level Analysis of Dioxins and PCBs by HR GC/MS
- Low & High Resolution Dioxin/Furans
- Trace Analysis of Polar Compounds by LC/MS
- Explosives Analysis
- PCB Congeners
- Incidental PCBs
- Pesticides & Herbicides
- Petroleum Hydrocarbons
- Chemical Degradation Products
- Natural Attenuation Parameters
- Alkyl Tins
- Comprehensive Organic and Inorganic Analysis
- Metals by ICP/MS
- Atomic Fluorescence
- Speciated Arsenic
- Low Level Mercury
- Radiochemistry and Mixed Waste Analysis
- Radiochemistry Bioassay Analysis
- Air Analysis: Ambient Air, Source Emissions
- Identification and Qualification of Mold, Fungi and Bacteria
- Identification and Enumeration of *Legionella* Bacteria
- Tissue and Biota
- Bioassay Analysis
- Aquatic Toxicology
- Geotechnical Analysis
- Microscopy Services
- Electron Microscopy Services
- Mobile Laboratory Services
- Sediments

2.2 Comprehensive range of program compliance support

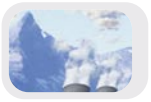
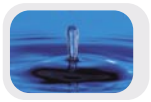
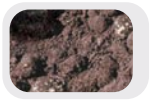
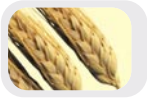
- Resource Conservation and Recovery Act (RCRA)
- Clean Water Act (CWA)
- National Pollution Discharge Elimination Systems (NPDES)
- Clean Air Act (CAA)
- Safe Drinking Water Act (SDWA)
- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
- Superfund Amendments and Reauthorization Act (SARA)
- Marine Protection, Research and Sanctuaries Act (MPRSA)
- Underground Storage Tank (UST) Programs
- Boiler & Industrial Furnace (BIF)
- Radioactive Environmental Monitoring Programs (REMP)
- Cluster Rule Programs
- Comprehensive State Regulatory Program Support
- Federal Program Support:
  - Army Corps
  - Air Force
  - Navy
  - National Guard
  - United States Geological Survey
  - Coast Guard
  - Department of Energy



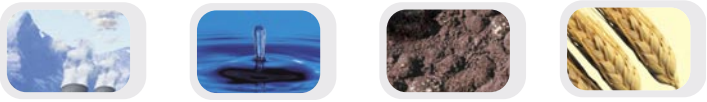
2.3 Diversified range of specialty services

- Courier Service
- Electronic Data Deliverables
- MySTL E-Services
- On-Line Data Access
- National Program Coordination
- QAPP Preparation and Development
- Expert Witness Testimony
- Method Development
- Industry Program Work Cells
- Laboratory Management Outsourcing
- Mobile Laboratories
- Field Sampling

2.4 Capability Matrix

Lab Name	Address	Phone/Fax	Specialty Services															Program Support												
																		Federal				Commercial								
			Air Testing	Bioassay	CWM Degradant Agents	Dioxins	Drinking Water	Endocrine Disrupters	Explosives	Geotechnical	Legionella	Metals Speciation	Microscopy	Mixed Waste	Mold	Radiological	Sediments	Tissue	USACE	AFCEE	DOE	Navy	Cluster Rule	Emerging Contaminants	Natural Attenuation	Retail Oil	Stationary Source Air	UST	TRRP	AFIOH	Food & Pharmacy
STL Austin	14050 Summit Drive, Suite A100 Austin, TX 78728	Ph: 512-244-0855 Fx: 512-244-0160	X										X		X				X	X				X	X	X		X	X	X	
STL Billerica	148 Rangeway Road N. Billerica, MA 01862	Ph: 978-667-1400 Fx: 978-677-7871					X						X																		
STL Buffalo	10 Hazelwood Dr., Suite 106 Amherst, NY 14228	Ph: 716-691-2600 Fx: 716-691-7991					X										X	X	X	X					X	X					
STL Burlington	208 South Park Drive, Suite 1 Colchester, VT 05446	Ph: 802-655-1203 Fx: 802-655-1248	X				X		X	X							X	X	X	X		X				X					
STL Chicago	2417 Bond Street University Park, IL 60466	Ph: 708-534-5200 Fx: 708-534-5211							X								X		X	X		X				X					
STL Connecticut	128 Long Hill Cross Road Shelton, CT 06484	Ph: 203-929-8140 Fx: 203-929-8142	X											X					X		X						X				
STL Corpus Christi	1733 N. Padre Island Drive Corpus Christi, TX 78408	Ph: 361-289-2673 Fx: 361-289-2471																		X						X		X	X		
STL Denver	4955 Yarrow Street Arvada, CO 80002	Ph: 303-736-0100 Fx: 303-431-7171							X					X		X	X	X	X	X	X				X	X		X	X	X	
STL Edison	777 New Durham Road Edison, NJ 08817	Ph: 732-549-3900 Fx: 732-549-3679					X										X		X				X	X							
STL Houston	6310 Rothway Street Houston, TX 77040	Ph: 713-690-4444 Fx: 713-690-5646	X																X									X	X		
STL Knoxville	5815 Middlebrook Pike Knoxville, TN 37921	Ph: 865-291-3000 Fx: 865-584-4315	X		X	X	X	X	X					X			X	X	X		X	X	X		X		X				
STL Los Angeles	1721 South Grand Avenue Santa Ana, CA 92705	Ph: 714-258-8610 Fx: 714-258-0921	X																X			X		X	X	X		X			
STL Miami	10200 USA Today Way Miramar, FL 33025	Ph: 954-431-4550 Fx: 954-431-1959					X						X		X		X					X						X			
STL Mobile	900 Lakeside Drive Mobile, AL 36693	Ph: 251-666-6633 Fx: 251-666-6696					X										X	X					X		X			X			
STL Newburgh	315 Fullerton Avenue Newburgh, NY 12550	Ph: 845-562-0890 Fx: 845-562-0841					X							X			X								X			X			
STL North Canton	4101 Shuffel Drive NW North Canton, OH 44720	Ph: 330-497-9396 Fx: 330-497-0772										X					X	X	X			X			X			X			
STL Pensacola	3355 McLemore Drive Pensacola, FL 32514	Ph: 850-474-1001 Fx: 850-478-2671	X																X		X	X			X	X		X			
STL Pittsburgh	301 Alpha Drive Pittsburgh, PA 15238	Ph: 412-963-7058 Fx: 412-963-2468			X												X	X	X			X			X			X			
STL Richland	2800 George Washington Way Richland, WA 99352	Ph: 509-375-3131 Fx: 509-375-5590		X			X									X			X	X	X	X									
STL Sacramento	880 Riverside Parkway West Sacramento, CA 95605	Ph: 916-373-5600 Fx: 916-372-1059	X		X	X	X	X	X								X	X	X	X	X	X	X	X		X	X		X		
STL St. Louis	13715 Rider Trail North Earth City, MO 63045	Ph: 314-298-8566 Fx: 314-298-8757					X		X					X		X	X	X	X		X	X					X				
STL San Francisco	1220 Quarry Lane Pleasanton, CA 94566	Ph: 925-484-1919 Fx: 925-484-1096							X										X			X			X	X		X			
STL Savannah	5102 LaRoche Avenue Savannah, GA 31404-6019	Ph: 912-354-7858 Fx: 912-351-3673					X					X					X	X	X	X	X	X					X				
STL Seattle	5755 8th Street, East Tacoma, WA 98424	Ph: 253-922-2310 Fx: 253-922-5047							X								X		X			X				X		X			
STL Tallahassee	2846 Industrial Plaza Drive Tallahassee, FL 32301	Ph: 850-878-3994 Fx: 850-878-9504					X		X								X	X	X			X	X			X					
STL Tampa	6712 Benjamin Road, Ste. 100 Tampa, FL 33634	Ph: 813-885-7427 Fx: 813-885-7049					X										X										X				
STL Valparaiso	2400 Cumberland Drive Valparaiso, IN 46383	Ph: 219-464-2389 Fx: 219-462-2953					X																		X		X				
STL Westfield	53 Southampton Road Westfield, MA 01085	Ph: 413-572-4000 Fx: 413-572-3707		X			X																				X				
Aerotech P&K (Cherry Hill)	1936 Olney Avenue Cherry Hill, NJ 08003	Ph: 856-489-4455 Fx: 856-489-4085									X		X		X																
Aerotech P&K (Phoenix)	1501 West Knudsen Drive Phoenix, AZ 85027	Ph: 623-780-4800 Fx: 623-780-7695									X		X		X																X
Aerotech Environmental Laboratories, Inc.	4455 South Park Avenue, Suite 110 Tucson, AZ 85714	Ph: 520-807-3801 Fx: 520-807-3803	X				X		X										X							X		X		X	



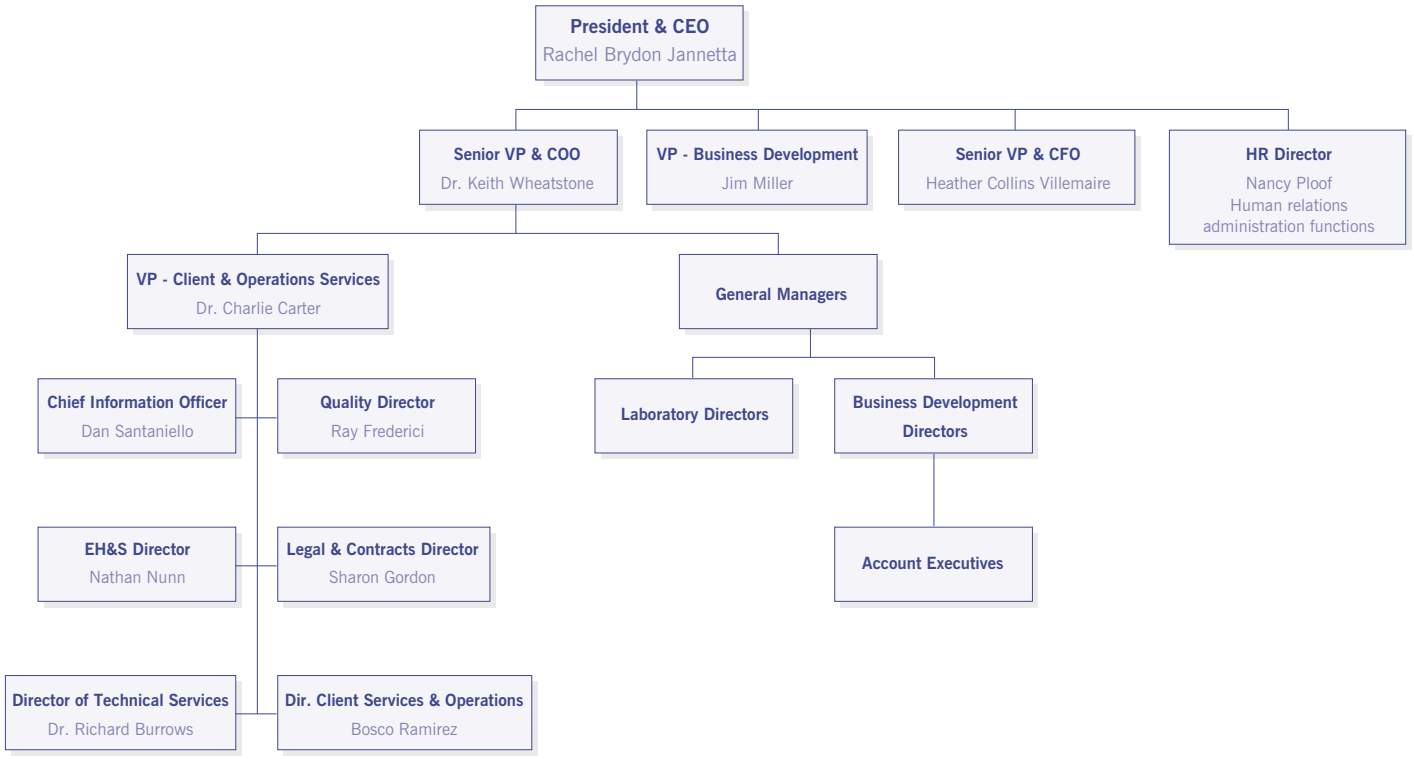
3. Personnel & Management

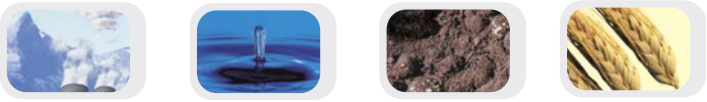
STL recognizes that the skills and knowledge of its employees are critical to the success of the organization. All STL employees are committed to providing responsive and accurate service. Operating with the highest professional standards, these employees have the technical expertise and business knowledge necessary to meet the demands of all their clients.

STL's staff of over 2000 professionals includes:

- analytical chemists
- microbiologists
- quality assurance specialists
- computer systems analysts
- environmental technicians
- client services staff
- project managers
- field personnel

In addition to STL's Senior Management structure, which is outlined below, each STL facility is under the supervision of a Laboratory Director who is responsible for the daily operations of the laboratory. Also, each facility has a Quality Assurance Manager who is responsible for overseeing the QA program of the laboratory.





3. Personnel & Management

President & CEO — Rachel Brydon Jannetta

As President of Severn Trent Laboratories for the past 12 years, Ms. Jannetta has overall management responsibility and authority for Severn Trent's laboratory business, as well as responsibility for the development and implementation of STL's US acquisition and growth strategy, with ultimate accountability to the parent company, Severn Trent Plc.

Senior VP & Chief Operating Officer (COO) — Dr. Keith Wheatstone

With a Ph.D. in Analytical Chemistry and 40 years of environmental laboratory experience, Dr. Wheatstone is responsible for the daily management of all STL facilities. The COO's responsibilities include allocation of personnel and resources, long-term planning, and development of technical policies and management plans.

Vice President Client & Operations Services (VP COS) — Dr. Charlie Carter

With a Ph.D. in Environmental Chemistry and over 20 years' experience in the environmental testing industry, as VP COS Dr. Carter is responsible for all essential elements of offerings to clients, including risk management, legal compliance and contract administration, quality assurance, information technology, and environmental health and safety.

Vice President Business Development — James Miller

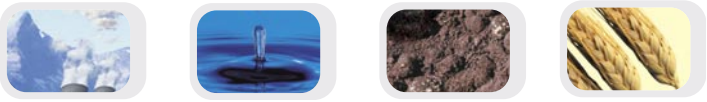
Mr. Miller's dual degrees in Chemical Engineering and Journalism, plus over 16 years' experience in the environmental laboratory industry, support his responsibilities for the strategic planning and guidance of STL's account executive team and marketing efforts. The VP Business Development is directly responsible for the sales strategy to achieve revenue growth and gross margin goals for STL.

Senior VP & Chief Financial Officer (CFO) — Heather Collins Villemaire

Ms. Villemaire has 11 years' experience in the environmental testing industry, with various management and officer positions including Controller and Director. As CFO, she is directly responsible for management of the finance, accounting, treasury, and purchasing functions for STL.

Human Resources Director — Nancy Ploof

With 17 years of HR experience and as a certified HRP, the HR Director is responsible for all human relations administration functions for STL.



3. Personnel & Management

Corporate QA Director Ray Frederici

Combined with his MBA, Mr. Frederici's degree in Environmental Biology and 20 years of experience in the environmental laboratory industry support his responsibilities for establishing, implementing and communicating STL's quality system. The QA Director monitors compliance with the QMP, provides regulatory and technical updates to the STL facilities, assists in development of management plans and technical policies to be approved by the COO, and coordinates training within STL. The QA Director is available to any employee in STL to resolve data quality or ethical issues. The QA Director is independent of operational functions.

Director of Technical Services Dr. Richard Burrows

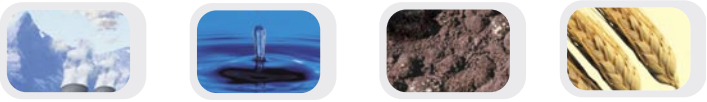
Dr. Burrows has a Ph.D. in Analytical Chemistry and over 18 years of related experience in academic and commercial settings. The Director of Technical Services is responsible for establishing, implementing and communicating STL's Technical Policies, Standard Operating Procedures, and Manuals. Other responsibilities include conducting technical assessments as required, acting as a technical resource in national contracts review, coordinating new technologies, establishing best practices throughout STL, advising STL staff on technology advances, innovations and applications, and organizing and running STL's technical committee.

Chief Information Officer (CIO) Dan Santaniello

Mr. Santaniello's seven years' experience in the laboratory services business, specializing in Information Systems and Operations, support his responsibilities as CIO to establish, implement and communicate STL's IT Policies, Standard Operating Procedures, and Manuals. Other responsibilities include coordinating new technologies, developing electronic communications tools such as STL's intranet and internet sites, ensuring data security, software documentation, and compliance with Good Automated Laboratory Practices (GALP), plus assisting in the establishment, update and maintenance of the Laboratory Information Management Systems (LIMS) at the various STL facilities.

Environmental Health & Safety (EH&S) Director Nathan Nunn

Mr. Nunn has 15 years' experience in coordinating compliance with federal, state and local EH&S regulations. As EH&S Director, he is responsible for establishing, implementing and communicating STL's Environmental Health and Safety Policies, Standard Operating Procedures, and Manuals. Other responsibilities include conducting EH&S assessments as required, acting as a resource for all STL facilities to ensure EH&S compliance, coordinating safety committees, providing guidance to the EH&S Coordinator at various STL facilities, and advising STL facilities on new EH&S regulations.



3. Personnel & Management

Legal & Contracts Director — Sharon Gordon

As an attorney admitted to both the California and Kansas bars, and with 24 years' experience in the environmental consulting field, Ms. Gordon's responsibilities as the Legal and Contracts Director include contract review/negotiation, compliance with corporate goals and regulatory requirements with respect to negotiation and administration of government and commercial contracts, and legal advice.

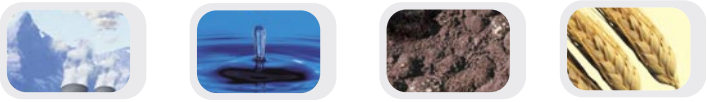
Director of Client Services & Operations — Bosco Ramirez

With an MS in Analytical Chemistry and a BS in Chemistry, plus 19 years of experience in various analytical testing roles, as Director of Client Services and Operations Mr. Ramirez provides business planning, troubleshooting and analytical support for STL's financial, operational and marketing disciplines.

General Manager (GM)

Ron Bayer
Jim Bentley
Roger Freize
Mark Nebiolo
Dr. Jack Tuschall
Robert Wyeth

The GM is directly responsible for the daily operations of several operating facilities within STL. The GM's responsibilities include allocation of personnel and resources, long-term planning, setting goals and achieving the financial, business and quality objectives of STL. The GM ensures timely compliance with corporate management directives, policies and management systems reviews.



4. Resources

4.1 Facilities

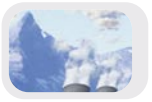
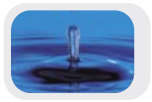
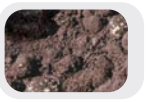
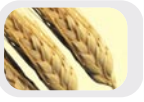
STL's facilities are designed for efficient, automated high-quality operations. Access to all STL facilities is controlled through various security systems and all facilities are equipped with structural safety features.

Facility	Square Footage
STL Austin	28,000
STL Billerica	3,500
STL Buffalo	32,000
STL Burlington	36,000
STL Chicago	48,500
STL Connecticut	17,000
STL Corpus Christi	14,000
STL Denver	54,000
STL Edison	42,000
STL Houston	28,000
STL Knoxville	29,000
STL Los Angeles	27,000
STL Miami	17,000
STL Mobile	14,000
STL Newburgh	8,000
STL North Canton	53,000

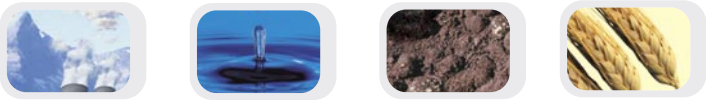
Facility	Square Footage
STL Pensacola	25,000
STL Pittsburgh	34,000
STL Richland	33,000
STL Sacramento	66,000
STL Savannah	55,000
STL San Francisco	21,000
STL Seattle	20,000
STL St. Louis	31,000
STL Tallahassee	22,000
STL Tampa	14,000
STL Valparaiso	14,500
STL Westfield	10,000
Aerotech P&K (Cherry Hill)	28,000
Aerotech P&K (Phoenix)	40,000
Aerotech Environmental Laboratories, Inc.	24,000

4.2 Instrumentation

STL's facilities contain instrumentation and equipment for analyzing water, wastewater, solid waste, soil, sludge, tissue and air samples.

Lab Name	No. of Instruments																										
	GC	GC/MS	Alpha Spectrometer	AA	Gas Proportional Counter	ICP	HPLC	IR	CVAA	IC	Wet Chemistry Autoanalyzer	UV-Visible Spectrophotometer	TOC	TOX	Gamma Spectrometer	Liquid Scintillation Detector	High Resolution GC/LRMS	High Resolution GC/HRMS	ICPMS	Kinetic Phosphorescence Analyzer	TEM	LCMS	FTIR	SEM	PCR Sequence Detector System	Stereomicroscope	Compound Microscope
STL Austin	30	15		1		2			2	3	3	2	2						1							1	5
STL Buffalo	17	12				2	1		2	3	3	2	2	2					1								
STL Burlington	19	13				3	4		2	2	4	2	3						1								
STL Chicago	13	11		3		3	6		2	2	3	3	2	2													
STL Connecticut	6	8				2		1	1	1	1	1	2														
STL Corpus Christi	11	5		1		2			1	2		1	1														
STL Denver	17	16	72	2	16	3	3		2	5	2	2	3	2	2	2			1			2					
STL Edison	23	22		1		3		1	2		3		1														
STL Houston	16	9		2		2	1		1	2	1		1														
STL Knoxville	8	8				2	2		1	4	1						1	3	1								
STL Los Angeles	15	15				2	1		1	1	1		1	1													
STL Miami	6	12		4		2		1	1	2	2	1	2													2	3
STL Mobile	11	6		2		1	1	1	1		2	1	1	3													
STL Newburgh	9	5		2		2		1	1	1	1	2	1						1								
STL North Canton	13	11				2	2		1	2	3	2	1	2					1								
STL Pensacola	26	10		2		2	2		1	1	2	2	1	1									2				
STL Pittsburgh	11	10				3	2		2	2	2	2	1	1					1								
STL Richland			286		78	2									12	6				2							
STL Sacramento	10	10				2	5			5	2	1	2	2			2	8	2			2					
STL San Francisco	19	14		1		1	1	1	1	1		1							1								
STL Savannah	17	13		2		2	1		2	3	4	2	2	2					1								
STL Seattle	10	10				1	2		2	1	2		1	1					1								
STL St. Louis	8	7	72	2	60	2	2		2	3	2	1	2	2	8	3			1	2							
STL Tallahassee	13	5		1		1	4	2	1	1	2	1	1									1					
STL Tampa	14	6			1	2	2		2	1		2	1						1								
STL Valparaiso	5	5		2		3	2		1	2	2	1	1						1								
STL Westfield	16	9		2		2	1	1	2	1	1	2	1								1			2		4	2
Aerotech P&K (Cherry Hill)												1													3	11	19
Aerotech P&K (Phoenix)																									3	4	67
Aerotech Environmental Laboratories, Inc.	7	7					3	1		2	1	4							1			1	1				
TOTAL	360	274	430	28	155	56	48	10	37	53	49	39	36	21	22	11	3	11	17	4	1	5	2	2	6	22	96



5. Quality

5.1 Quality Assurance Policy

It is STL's policy to:

- provide high quality, consistent, and objective environmental testing services that meet all federal, state, and municipal regulatory requirements.
- generate data that are scientifically sound, legally defensible, meet project objectives, and are appropriate for their intended use.
- provide STL clients with the highest level of professionalism and the best service practices in the industry.
- build continuous improvement mechanisms into all laboratory, administrative, and managerial activities.
- maintain a working environment that fosters open communication with both clients and staff.

5.1.1 Objectives of STL Quality System

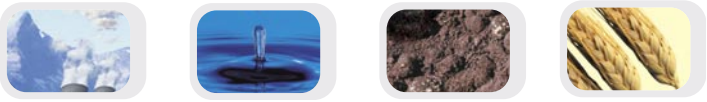
The goal of the STL Quality System is to ensure that business operations are conducted with the highest standards of professionalism in the industry.

To achieve this goal, it is necessary to provide STL clients with not only scientifically sound, well documented, and regulatory compliant data, but also to provide the highest quality service experience available in the industry. STL's Quality System is designed to provide a framework for continuous improvement within the organization, minimize systematic error, and to encourage constructive, documented problem solving.

5.1.2 Management commitment to quality assurance

STL management is committed to providing the highest quality data and the best overall service in the environmental testing industry. To ensure that data produced and reported by STL meet the requirements of its clients and comply with the letter and spirit of municipal, state and federal regulations, STL maintains a Quality System that is clear, effective, well communicated and supported at all levels in the company.

The elements that comprise STL's Quality System are outlined in detail in the Quality Management Plan. This document can be obtained by contacting any STL facility. All laboratories are designed for efficient, automated high-quality operations. Access to all STL facilities is controlled through various security systems and all facilities are equipped with structural safety features.



5. Quality

5.1.3 Proficiency testing

STL analyzes Proficiency Test (PT) samples as required for accreditation and as outlined in the National Environmental Laboratory Accreditation Conference (NELAC). Each STL facility participates in the PT program semi-annually for each area of testing and matrix (e.g. organics, inorganics, microscopy, radiological, microbiological, aqueous and drinking water) for which it is certified.

5.1.4 Double blind performance evaluation

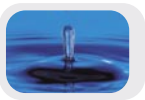
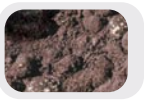
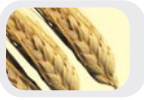
Each STL facility also participates in a double blind performance program annually, which is administered by the Corporate QA Manager. An external vendor is contracted to submit double blind samples to each STL facility. Both the level of customer service and the accuracy of the test results are assessed objectively by the external contractor, who provides a detailed report to the Corporate QA Director and each of the STL facilities. This is administered as a double blind program in order to assess all facets of STL operations.

5.1.5 Client confidentiality & proprietary rights

Data and sample materials provided by the client or at the client's request, and the results obtained by STL, are held in confidence subject to any disclosure required by law or legal process. STL's reports, and the data and information provided therein, are for the exclusive use and benefit of the client, and are not released to a third party without written consent from the client.

5.1.6 Record retention & archival

STL has developed a formal record retention policy in its Corporate Quality Management Plan that outlines the period of time various record types must be archived. Archives are indexed such that records are accessible on either a project or temporal basis. Archives are protected against fire, theft, loss, deterioration and vermin. Electronic records are protected from deterioration caused by magnetic fields and/or electronic deterioration. Access to archives is controlled and documented.

5. Quality

5.2 Certification

STL is certified/qualified in 50 states and several federal programs. It is important to note that some states only certify in-state labs, but accept results from out-of-state labs as long as they are certified in the state in which they are located and pass WP/WS studies. Certification information for each of STL's facilities can be obtained via STL's web site at www.stl-inc.com

5.2.1 NELAP Accreditation

Twenty-seven of STL's laboratory facilities have received NELAP (National Environmental Laboratory Accreditation Program) accreditation.

NELAP is the accrediting program for NELAC, the National Environmental Laboratory Accreditation Conference. NELAC is a voluntary association of State and Federal agencies, sponsored by the US EPA to establish and promote national performance standards for the operation of environmental laboratories. NELAC actively seeks input from the public sector, and STL has been very active in working with NELAC, sitting on a number of committees and providing comments and assistance in development and implementation of the standards.

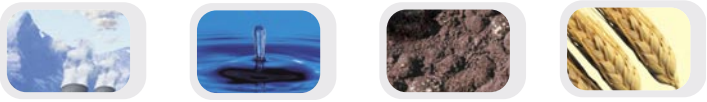
5.3 E-commerce

STL is constantly striving to develop faster and more efficient methods of information gathering and distribution. Investments in information technology have enabled STL to quickly and efficiently gather, process and deliver sample results, saving valuable time and money for the client. This is complemented by the ability to provide data electronically on diskette, CD, via e-mail or across the web through our MySTL e-solutions offering.

5.3.1 MySTL

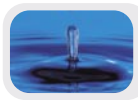
MySTL allows all aspects of an environmental data program to be tracked remotely via the customer's PC. It provides quick access – day or night, at work or on the road – through your own familiar web browser.

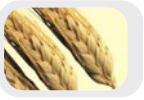
This empowers customers and provides them with a place where they can organize their environmental data program - an online resource that will make their job easier, their workflow faster and desktops cleaner. Just think of it as an electronic filing cabinet – a window into STL … reports … requests … support documents … all of the elements required for managing an environmental data project whenever it is needed.



5. Quality

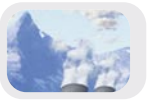
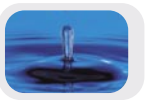
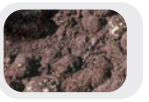
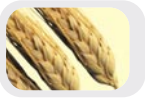
- Real time access to sample status and results data in STL's Laboratory Information Management Systems (LIMS).
- 24/7 access to download Electronic Data Deliverable (EDD) files.
- Convenient organization of all program information - both external and STL generated - in one place.
- Instant archiving of all documents for secure storage and fast retrieval.
- Dynamic interactive capabilities, enabling personal quote generation.
- Access to analytical capabilities and methodologies to help select the best procedures for performing work.
- Access to lists of Certification programs detailing which STL labs perform work under these programs.
- Online access to invoices and quotes.

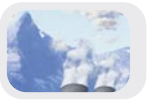
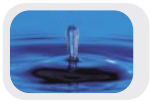
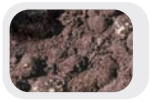
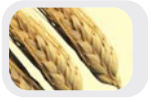


6. Project Experience

Project Name & Location	Owner Name & Address	Completion Date (actual or ongoing)
Reese AFB Analytical support for 10–year program including RIFS, cleanup, monitoring and closure under the BRAC.	**URS** 8501 N. MoPac Blvd. Austin, TX 78720 AFCEE IRP	Ongoing
Altus AFB, Altus, Oklahoma Laboratory Analytical Services Under AFCEE Contract.	**Earth Tech** 1420 King Street, Suite 600 Alexandria, VA 22314 AFCEE Worldwide RAC	Ongoing
Baird & McGuire Superfund Site, Holbrook, MA Responsible for the management of an on site laboratory validated by USACE at this groundwater pump and treat facility. On-site analysis include VOCs, SVOCs, Pesticides, and metals.	**PSG** 775 South Street Holbrook, MA 02343 USACE New England District	June 2004
Massachusetts Military Reservation, Otis ANGB, MA On-site laboratory provides for the analysis of groundwater samples in support of various plume delineation and remediation activities. Analyses include VOCs by EPA Method 8260 and Ethylene dibromide (EDB) by EPA Method 504. Full AFCEE hardcopy and EDD provided on expedited turnaround time.	**Jacobs Engineering Group, Inc.** 318 East Inner Road Otis ANGB, MA 02542 AFCEE	Ongoing
Atsugi Naval AFB Air quality monitoring including analysis of Summa canisters, cartridges, filters, and denuder samples for VOCs, semivolatiles, pesticides, PCBs, particulate, metals and anions.	**URS** 8501 N. MoPac Blvd. Austin, TX 78720 Navy LANTIDV	July 1999
US Geological Survey Laboratory analysis of soil and aqueous samples Various site Contracts.	**USGS DODEC 1434-CR-96-CN-40253** National Water Quality Laboratory 5293 Ward Road Arvada, CO 80002	Ongoing
IT Corporation / Foster Wheeler Environmental Corp. American Thermostat Site. Groundwater Extraction, Treatment and Reinjection, South Cairo, NY.	**Shaw E&I** 13 British American Blvd. Latham, NY 12110 ARCS II Program – EPA Contract No.: 68-W8-0110	2005
Former Joliet Ordnance Army Ammunitions Plant, IL Analysis for explosives, metals, PCBs, VOCs, SVOCs, Wet Chemistry, TCLP & waste characterization parameters in support of excavation, bio-remediation, ground water, and NPDES projects.	**Montgomery Watson** 41551 Eleven Mile Road Novi, MI 48375 USACE Louisville District TERC	Through 2002 with 5 1/2 year options
Elemdorf AFB Analysis of samples from long–term groundwater monitoring.	**URS** 8501 N. MoPac Blvd. Austin, TX 78720 AFCEE	1998
Redstone Arsenal, Madison County, Alabama Analyzed more than 4500 samples from more than 90 sites, some of which were known chemical warfare agent areas.	**Shaw E&I** 312 Directors Drive Knoxville, TN 37923 **US Army Corps of Engineers** Savannah District TERC	August 2000
Ft. McClellan, Alabama Analytical support for the remedial investigation and ecological assessments at Ft. McClellan in Alabama.	**Shaw E&I** 312 Directors Drive Knoxville, TN 37923 **US Army Corps of Engineers** Savannah District TERC	August 2000
PRASA owned Waste Water Treatment Plants throughout Puerto Rico Analytical support services provided quarterly for 301 (h) Waiver Demonstration and Mixing Zone Validations studies of surface water, sediment and fish for organic and inorganic parameters.	**CH2M Hill** 800 Fairway Drive, Suite 350 Deerfield Beach, FL 33441 EPA Region 2	Ongoing
Charleston AFB Analytical support for IRP (1997) and groundwater monitoring.	**URS** 8501 N. MoPac Blvd. Austin, TX 78720	Ongoing

Project Name & Location	Owner Name & Address	Completion Date (actual or ongoing)
Multiple sites in the U.S. Navy – Western Division program Analyses include VOA, BNA, Pest/PCB, metals, explosives & organo-tin compounds in support of soil remediation, GW monitoring and treatability studies.	**Tetra Tech EM Inc.** 135 Main Street San Francisco, CA 94105 Navy CLEAN II	9-1-96 - 5-31-97 with 4 option years
Willow Grove AFB Analysis of soil and groundwater for organic and inorganic parameters.	**Montgomery Watson Americas, Inc.** 335 Phoenixville Pike Malvern, PA 19335 AFCEE Worldwide	Current
Camp Crowder, MO Analyses include TCL/TAL, DRO on soil and water samples.	**Ellis Environmental Group** 304 SW 140th Terrace Newberry, FL 32269 USACE Kansas City District	Ongoing
Multiple Cape Canaveral and Kennedy Space Center sites Analytical support services for NASA.	**Cape Environmental Management** 7032 South Revere Parkway Englewood, CO 80112 AFCEE	Ongoing
Southern Maryland Wood Treatment Superfund Site in Hollywood, Maryland Analyses included polynuclear aromatic hydrocarbons (PAHs), volatile and semivolatile organic compounds and metals.	**EA Engineering, Science and Technology, Inc.** Sparks, Maryland (Phase I) **Shaw E&I** Edgewood, Maryland (Phase II)	Ongoing
Northrup Grumman – Pico Rivera Site Analysis of soils for various parameters at a closed aircraft manufacturing plant to facilitate a real estate transaction.	**URS** 8501 N. MoPac Blvd. Austin, TX 78720 USACE Omaha	1999
Greenwood Chemical Site in Newton, VA Analyses included volatile, semivolatiles, and metals using CLP methodologies and a variety of general chemistry and geotechnical parameters.	**USACE, Baltimore District** Baltimore, Maryland USACE Laboratory BPA	Ongoing
Picattiny Arsenal, NJ Analyses include TCL/TAL, explosives.	**Shaw E&I** 111 Howard Blvd. Suite 110 Mount Arlington, New Jersey 07856 USACE	Ongoing
Ravenna Arsenal, OH Analyses include TCL/TAL, explosives, propellants, general chemistry parameters, and waste characterization.	**SAIC** 800 Oak Ridge Turnpike Oak Ridge, TN 37830 USACE Louisville District PRAC	Ongoing
NAS Dallas, Texas Analyses include TCL/TAL, general chemistry parameters, and waste characterization.	**Tetra Tech NUS** 661 Andersen Drive Pittsburgh, PA 15220 Navy Southwest CLEAN II	Ongoing
Pease AFB Analyses of soils for various parameters including radiochemical, mixed-waste and bioassay.	**Bechtel Jacobs, LLC** P.O. Box 4699 OakRidge, TN 37831 AFCEE Base Specific IRP	9-30-01
Hanford Site, Richland, WA Analyses to support on site remediation and groundwater monitoring activity.	**Fluor Hanford** P.O. Box 1000 Richland, WA 99352 Department of Energy	Ongoing
Weldon Spring Site, Weldon Spring, MO Analyses to support chemical monitoring of contamination, including radiochemical	**S.M. Stoller Corporation** 2597B 3/4 Road Grand Junction, CO 81503 Department of Energy	Ongoing
SLAPS (FUSRAP), St. Louis, MO Analysis of soils and waters for general chemistry and radiochemistry	**Ron Frerker** USACE, CEMVS-ED-C, 1222 Spruce Street, St Louis, MO 63103-1033 USACE St. Louis District	Ongoing
Edwards Air Force Base Continuous ground water monitoring project and analyses of CWM degradates.	**Earth Tech** 1421 E. Cooley Drive Colton, CA 92324 AFCEE IRP	Ongoing

Project Name & Location	Owner Name & Address	Completion Date (actual or ongoing)
Norton Air Force Base Multiple groundwater and soil analyses.	**Earth Tech** 1421 E. Cooley Drive Colton, CA 92324 AFCEE IRP	Ongoing
NWIRP McGregor, McGregor, Texas Analyses include Perchlorate.	**EnSafe Inc.** 5724 Summer Trees Drive Memphis, TN 38134 Navy Southdiv Navy CLEAN II	Ongoing
Air Force Plant 6 – Dobbins Air Force Base, Georgia Quarterly analyses including Volatiles, Semivolatiles, Metals and Appendix IX.	**CH2M Hill** 115 Perimeter Center Place NE 700 Atlanta, GA 30346 AFCEE	2002
Arnold Air Force Base, Tullahoma, TN Analytical services for a five year RCRA facility investigation in support of a corrective action program. Includes collection of water, soil, and sediment samples for SWMU characterization, monitoring and treatability.	**CH2M Hill** 151 Lafayette Drive Suite 110 Oak Ridge, TN 37830 EPA Region IV	Ongoing
MacDill Air Force Base, FL Analytical services for soil, fish, and groundwater samples under a confirmatory sampling investigation and human health risk evaluation project.	**Black & Veatch Waste Science & Technology, Inc.** 1145 Sanctuary Parkway, Suite 475 Alpharetta, GA 30004 USACE Mobile District	Ongoing
Dobbins Air Force Base, Marietta, GA Analytical support for various areas under Georgia UST Management Program; soil and groundwater analyses for plume contamination delineation.	**Montgomery Watson Americas** 1100 Johnson Ferry Road, NE Suite 460 Atlanta, GA 30342 AFRC	Ongoing
Aberdeen Proving Grounds Four STL labs supported Weston at Aberdeen Proving Grounds for VOCs, SVOCs, Pesticides, PCBs, Total & Dissolved Metals, Chemical Degradants, Perchlorates, Explosives, Radiological, Physical testing and Wet Chemistry using Project Specific QAPP. Our internet tool MySTL was used to track samples and report data and project information.	**Weston Solutions, Inc.** 1309 Continental Dr. Abingdon, MD 21009 USACE	2002
Cornhuskers AAP Support of Long Term Operations/Long Term Monitoring contract with USACE Kansas City District. Treatment plant monitoring of weekly discharge samples for Explosives, VOCs, Metals, Wet Chemistry. Level III validation report and ERPIMS 4.0 EDD with 14 day TAT. Additionally annually analyzed Explosives, VOC, Metals and various Natural Attenuation parameters with level III or level IV validation and IRDMIS EDD in 21 days.	**HydroGeoLogic, Inc.** 1155 Herndon Parkway Herndon, VA 20170 USACE	Ongoing
Moody Air Force Base, Valdosta, Georgia Analyze monthly and quarterly groundwater samples for volatiles and metals and soil samples for volatiles, semi-volatiles, pesticides, PCBs and metals in support of remedial investigations.	**Shaw Environment & Infrastructure** 312 Directors Drive Knoxville, TN 37923 US Army Corps of Engineers Omaha District	Ongoing
West Valley Nuclear Demonstration Project West Valley, NY Analysis of water/SPDES discharge/drinking water and waste analysis.	**West Valley Nuclear Service Company** Division of Westinghouse USDOE	2004

866-STL-LABS
info@stl-inc.com
www.stl-inc.com




SEVERN TRENT STL® Leaders in Environmental Testing

APPENDIX 8

CALIFORNIA UNIFORM HAZARDOUS WASTE MANIFEST

m Approved OMB No. 2050-0039 (Expires 9-30-99)
ase print or type. Form designed for use on elite (12-pitch) typewriter.

See instructions on back of page 6.

Department of Toxic Substances Control
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. | Manifest Document No. | 2. Page 1 of | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

4. Generator's Phone ( )

A. State Manifest Document Number: 21203891

B. State Generator's ID

5. Transporter 1 Company Name | 6. US EPA ID Number

C. State Transporter's ID (Reserved.)

D. Transporter's Phone

7. Transporter 2 Company Name | 8. US EPA ID Number

E. State Transporter's ID (Reserved.)

F. Transporter's Phone

9. Designated Facility Name and Site Address | 10. US EPA ID Number

G. State Facility's ID

H. Facility's Phone

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste Number
a.					State / EPA/Other
b.					State / EPA/Other
c.					State / EPA/Other
d.					State / EPA/Other

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

a. | b. | c. | d.

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name | Signature | Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Month Day Year

DO NOT WRITE BELOW THIS LINE.

TSC 8022A (1/99)
PA 8700—22

White: TSDF SENDS THIS COPY TO DTSC WITHIN 30 DAYS.
To: P.O. Box 3000, Sacramento, CA 95812

APPENDIX 9

INSPECTION FORMS

DAILY INSPECTION FORM

DAILY INSPECTION FORM

KW PLASTICS OF CALIFORNIA, INC.
BAKERSFIELD, CALIFORNIA

Inspector Name: _____ **Inspector Signature:** _____

Date: _____ **Time:** _____

Unit	Inspection Items	Comments	Date and Nature of Repairs or Remedial Actions Taken
Receiving Hopper	Operating Properly		
	Structural Integrity of Unit (Corrosion, Damage, etc.)		
	Spilled PP Chips Present Outside of Unit		
Tank No. 1 Float Separator Tank	Operating Properly		
	Structural Integrity of Tank (Cracks, Leaks, etc.)		
	Damage/Deterioration of Foundations		
Tank No. 2 Grinder Tank	Operating Properly		
	Structural Integrity of Tank (Cracks, Leaks, etc.)		
	Damage/Deterioration of Foundations		

Unit	Inspection Items	Comments	Date and Nature of Repairs or Remedial Actions Taken
Tank No. 3 Wash Tank	Operating Properly		
	Structural Integrity of Tank (Cracks, Leaks, etc.)		
	Damage/Deterioration of Foundations		
Tank No. 4 Rinse Tank	Operating Properly		
	Structural Integrity of Tank (Cracks, Leaks, etc.)		
	Damage/Deterioration of Foundations		
Tank No. 5 Holding Tank	Operating Properly		
	Structural Integrity of Tank (Cracks, Leaks, etc.)		
	Damage/Deterioration of Foundations		
Tank No. 6 Recycling Tank	Operating Properly		
	Structural Integrity of Tank (Cracks, Leaks, etc.)		
	Damage/Deterioration of Foundations		

Unit	Inspection Items	Comments	Date and Nature of Repairs or Remedial Actions Taken
Tank No. 7 Recycling Tank	Operating Properly		
	Structural Integrity of Tank (Cracks, Leaks, etc.)		
	Damage/Deterioration of Foundations		
Tank No. 8 Recycling Tank	Operating Properly		
	Structural Integrity of Tank (Cracks, Leaks, etc.)		
	Damage/Deterioration of Foundations		
Tank No. 9 Recycling Tank	Operating Properly		
	Structural Integrity of Tank (Cracks, Leaks, etc.)		
	Damage/Deterioration of Foundations		
Tank No. 10 Water Recovery Tank	Operating Properly		
	Structural Integrity of Tank (Cracks, Leaks, etc.)		
	Damage or Deterioration of Surrounding Concrete Pad		

Unit	Inspection Items	Comments	Date and Nature of Repairs or Remedial Actions Taken
Tank No. 11 Holding Water Tank	Operating Properly		
	Structural Integrity of Tank (Corrosion, Damage, etc.)		
	Debris Present Within Tank		
Storm Water Collection Sump	Pump & Switch Operating Properly		
	Concrete Integrity (Cracks, Deterioration, etc.)		
	Sediment or Debris Present Within Sump		
	Integrity of Pump (Ruptures, Leaks, etc.)		
Filter Press	Operating Properly		
	Excess Filter Cake Surrounding the Unit		
Secondary Containment	Structural Integrity (Cracks, Deterioration, etc.)		
	Water Present Within the Sumps		
	Polypropylene Chips Present Within the Area		

Unit	Inspection Items	Comments	Date and Nature of Repairs or Remedial Actions Taken
Water Retention Areas	Concrete Integrity (Cracks, Deterioration, etc.)		
	Liner Integrity (Holes, Peeling, etc.)		
	Freeboard Level		

WEEKLY INSPECTION FORM

WEEKLY INSPECTION FORM

KW PLASTICS OF CALIFORNIA, INC.
BAKERSFIELD, CALIFORNIA

Inspector Name: _____ **Inspector Signature:** _____

Date: _____ **Time:** _____

Unit	Inspection Items	Comments	Date and Nature of Repairs or Remedial Actions Taken
Bale Storage Area	Concrete Floor Integrity (Cracks, Breaks, etc.)		
	Bale Packaging (Plastic Wrapping Intact)		
	Loose Polypropylene Chips Present Within the Area		
Water Retention Areas	Leachate Collection Ports for Leachate Generation		
	Berm and Liner Integrity (Cracks, Breaks, etc.)		
	Proper Functioning of System		
	Any Corrosion or Deterioration Observed?		
	Any Ruptures or Leaks Observed?		

Unit	Inspection Items	Comments	Date and Nature of Repairs or Remedial Actions Taken
Decontamination Equipment	Location		
	Operation		
	Access		
	Maintenance		
Protective Clothing	Location		
	Inventory		
	Access		
Respirators	Location		
	Operation		
	Access		
Alarm Systems (two way radios)	Operation		

MONTHLY INSPECTION FORM

MONTHLY SAFETY AND EMERGENCY EQUIPMENT INSPECTION FORM

KW PLASTICS OF CALIFORNIA, INC.
BAKERSFIELD, CALIFORNIA

Inspector Name: _____ **Inspector Signature:** _____

Date: _____ **Time:** _____

Unit	Inspect	Comment	Date and Nature of Repairs or Remedial Actions Taken
Eye Protection	Location Inventory		
Empty Drums	Location Inventory		
Portable Lights	Location Operational		
Stand-By Power Generators	Operational		
Safety Harness	Inventory Location Access		
Water Hose	Location Access		
Particulate Filter Mask	Inventory Location Access		
Rubber Insulation Gloves	Inventory Location Access		

Unit	Inspect	Comment	Date and Nature of Repairs or Remedial Actions Taken
Fire Extinguishers	Operational		
	Chemical		
	Level		
	Access		
	Location		
Medical Kit	Inventory		
	Access		
	Location		
	Instructions		
Emergency Showers	Operational		
	Access		
	Location		
Eyewash Stations	Operational		
	Access		
	Location		

QUARTERLY, SEMI-ANNUAL, AND ANNUAL INSPECTION FORM

QUARTERLY, SEMI-ANNUAL, AND ANNUAL INSPECTION FORM

KW PLASTICS OF CALIFORNIA, INC.
BAKERSFIELD, CALIFORNIA

Inspector Name: _____ **Inspector Signature:** _____

Date: _____ **Time:** _____

Unit	Inspect	Comment	Date and Nature of Repairs or Remedial Actions Taken
Telephones	Operational		
	Access		
Sampling Equipment	Availability		
	Broke (Malfunctioning)		
	Location		
	Contaminated		
Lighting, Fixed and Portable	Operational		
	Power Source		
	Inventory		
	Maintenance		
Gates/Fencing	Deterioration		
	Damage (Chain-Link/Barbed Wire Cuts)		
	Test Locks		

SEMI-ANNUAL INSPECTION			
Signs **"DANGER-HAZARDOUS WASTE AREA-UNAUTHORIZED PERSONNEL KEEP OUT"**	Visibility from 25 Feet		
	Structural Support		
	Location		
ANNUAL INSPECTION OF REGULATED UNIT/TANK INTERIORS (All annual tank interior inspections are to be conducted when the tank has been emptied and sufficient lighting is provided to allow visible inspection of the entire interior surface.)			
Receiving Hopper	Corrosion or Deterioration Present on the Interior Walls of the Tank/Unit		
	Visible Cracks on the Interior Walls of the Tank/Unit		
Tank No. 1 Float Separator Tank	Corrosion or Deterioration Present on the Interior Walls of the Tank/Unit		
	Visible Cracks on the Interior Walls of the Tank/Unit		
Tank No. 2 Grinder Tank	Corrosion or Deterioration Present on the Interior Walls of the Tank/Unit		
	Visible Cracks on the Interior Walls of the Tank/Unit		
Tank No. 3 Wash Tank	Corrosion or Deterioration Present on the Interior Walls of the Tank/Unit		
	Visible Cracks on the Interior Walls of the Tank/Unit		
Tank No. 4 Rinse Tank	Corrosion or Deterioration Present on the Interior Walls of the Tank/Unit		
	Visible Cracks on the Interior Walls of the Tank/Unit		

ANNUAL INSPECTION OF REGULATED UNIT/TANK INTERIORS (All annual tank interior inspections are to be conducted when the tank has been emptied and sufficient lighting is provided to allow visible inspection of the entire interior surface.)			
Tank No. 5 Holding Tank	Corrosion or Deterioration Present on the Interior Walls of the Tank/Unit		
	Visible Cracks on the Interior Walls of the Tank/Unit		
Tank No. 6 Recycling Tank	Corrosion or Deterioration Present on the Interior Walls of the Tank/Unit		
	Visible Cracks on the Interior Walls of the Tank/Unit		
Tank No. 7 Recycling Tank	Corrosion or Deterioration Present on the Interior Walls of the Tank/Unit		
	Visible Cracks on the Interior Walls of the Tank/Unit		
Tank No. 8 Recycling Tank	Corrosion or Deterioration Present on the Interior Walls of the Tank/Unit		
	Visible Cracks on the Interior Walls of the Tank/Unit		
Tank No. 9 Recycling Tank	Corrosion or Deterioration Present on the Interior Walls of the Tank/Unit		
	Visible Cracks on the Interior Walls of the Tank/Unit		
Tank No. 10 Water Recovery Tank	Corrosion or Deterioration Present on the Interior Walls of the Tank/Unit		
	Visible Cracks on the Interior Walls of the Tank/Unit		
Tank No. 11 Holding Water Tank	Corrosion or Deterioration Present on the Interior Walls of the Tank/Unit		

ANNUAL INSPECTION OF REGULATED UNIT/TANK INTERIORS

(All annual tank interior inspections are to be conducted when the tank has been emptied and sufficient lighting is provided to allow visible inspection of the entire interior surface.)

	Visible Cracks on the Interior Walls of the Tank/Unit		
Storm Water Collection Sump	Corrosion or Deterioration Present on the Interior Walls of the Tank/Unit		
	Visible Cracks on the Interior Walls of the Tank/Unit		

APPENDIX 10

LOCAL EMERGENCY AGENCIES COORDINATION LETTERS

KW Plastics of California

P.O. Box 80418 • Bakersfield, California 93380 • (661) 392-0500
1861 Sunnyside Court • Bakersfield, California 93308

December 17, 2003

Mack Wimbish
Kern County Sheriff's Department
1350 Norris Road
Bakersfield, California 93308

RE: Notification of Hazardous Materials Operations

Dear Mr. Wimbish:

KW Plastics of California, Inc., (KW California) operates a plastic recycling facility located at 1861 Sunnyside Court in Bakersfield. Some of the materials and activities at the facility are regulated under the State of California's Environmental Health Standards for the management of hazardous waste. One of the requirements that KW California must meet involves making arrangements with local authorities in order to be prepared in the event of an emergency situation (22 California Code of Regulations 66265.37 and 66265.52).

We respectively request your assistance in making these arrangements with the Kern County Sheriff's Department. Attached is a drawing of the facility detailing areas where plant personnel would be normally working, entrances/exits for the facility, and possible evacuation routes. Also included is a brief description of the properties of hazardous waste handled at the facility and associated hazards.

If you would, please see that appropriate copies reach the proper officials within the Kern County Sheriff's Department. Upon receipt of this information, a written response for KW California's records will be greatly appreciated.

KW California values the interest and assistance that the City of Bakersfield has bestowed in the past. We look forward to a continued, mutually beneficial association.

If you have any questions or need additional information, please do not hesitate to call me at (800) 633-8744.

Sincerely,

Roy Baggett
Manager of Environmental Affairs
KW Plastics of California, Inc.

KW Plastics of California

P.O. Box 80418 • Bakersfield, California 93380 • (661) 392-0500
1861 Sunnyside Court • Bakersfield, California 93308

December 17, 2003

Steve Gage
Chief, Kern County Fire Department
5642 Victor Street
Bakersfield, California 93308

RE: Notification of Hazardous Materials Operations

Dear Chief Gage:

KW Plastics of California, Inc., (KW California) operates a plastic recycling facility located at 1861 Sunnyside Court in Bakersfield. Some of the materials and activities at the facility are regulated under the State of California's Environmental Health Standards for the management of hazardous waste. One of the requirements that KW California must meet involves making arrangements with local authorities in order to be prepared in the event of an emergency situation (22 California Code of Regulations 66265.37 and 66265.52).

We respectively request your assistance in making these arrangements with the Kern County Fire Department. Attached is a drawing of the facility detailing areas where plant personnel would be normally working, entrances/exits for the facility, and possible evacuation routes. Also included is a brief description of the properties of hazardous waste handled at the facility and associated hazards.

If you would, please see that appropriate copies reach the proper officials within the Kern County Fire Department. Upon receipt of this information, a written response for KW California's records will be greatly appreciated.

KW California values the interest and assistance that the City of Bakersfield has bestowed in the past. We look forward to a continued, mutually beneficial association.

If you have any questions or need additional information, please do not hesitate to call me at (800)-633-8744.

Sincerely,

Roy Baggett
Manager of Environmental Affairs
KW Plastics of California, Inc.

KW PLASTICS OF CALIFORNIA, INC.
FIRE CONTROL

Plastic recycling facilities, such as KW Plastics of California, Inc., (KW California) in general have a minor exposure to the risk of fire. Most materials of construction are concrete, steel, and aluminum, which do not readily support combustion. There are however, a few key points of which a fire fighting crew should be aware.

1. Plastic Storage

The necessary accumulation of this material represents the largest potential for fire to spread in the unlikely event of combustion. Plastic accumulations at KW California would be storage silos, process tanks, and unloading hopper. These areas, if exposed to fire could be difficult to extinguish.

2. Emission Control System

Fine dust and products of combustion in enclosures have the potential to burn. Should this occur, isolation of the section and exclusion of air is the best approach.

3. Associated Reagents

Several chemicals are used in the cleaning and processing of the recycled polypropylene plastic. These reagents should be mentioned and storage areas known to fire fighting personnel.

- Caustic Soda
- Diluted Sulfuric Acid
- Hydrochloric Acid
- Lead

4. General Comments

- Since KW California removes lead from incoming raw material, fire or explosion would likely cause exposure to lead-in-air. Respirators with a HEPA filter should be in use while working the incident.

- Materials handled at KW California which are regulated fall into the category:

- Characteristic of Toxicity - Lead (USEPA Code D008)

- All plant personnel in the hazardous waste area receive and complete hazardous waste training in addition to their specific job training.

KW Plastics of California

P.O. Box 80418 • Bakersfield, California 93380 • (661) 392-0500
1861 Sunnyside Court • Bakersfield, California 93308

December 17, 2003

Dr. Javier Miro
Bakersfield Memorial Hospital
P.O. Box 1888
Bakersfield, California 93301-1888

RE: Notification of Hazardous Materials Operations

Dear Dr. Miro:

KW Plastics of California, Inc., (KW California) operates a plastic recycling facility located at 1861 Sunnyside Court in Bakersfield. Some of the materials and activities at the facility are regulated under the State of California's Environmental Health Standards for the management of hazardous waste. One of the requirements that KW California must meet involves making arrangements with local authorities in order to be prepared in the event of an emergency situation (22 California Code of Regulations 66265.37 and 66265.52).

It is specifically required that KW California make local hospitals aware of the properties of the hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

Materials handled at KW California which are regulated are defined under the following category:

Characteristic of Toxicity - Lead (USEPA Code D008)

The material handled at the facility considered to possess the characteristic of toxicity are plant raw materials and waste material containing the metal, lead.

The types of injuries, which could result from an emergency situation at the plant, include burns, eye injuries, and other injuries of a more general industrial nature. Exposure to the metallic lead is not likely to contribute to an emergency health hazard.

Despite the relatively inert nature of the metal involved, hospital personnel should be made aware that KW California employees brought to the hospital in an emergency would likely be wearing clothing contaminated with lead. Care should be taken to minimize the exposure of other patients and hospital employees to this clothing. Ideally, the contaminated clothing should be removed from the patient as soon as possible and stored in plastic bags or other suitable containers. This clothing should be laundered separately from other clothing should this be necessary. Any dust or residue left on hospital surfaces

by this clothing (e.g. dust from boots) should be cleaned as soon as possible.

If you would, please see that copies of this letter reach appropriate members of your staff so that they will be aware of these procedure should the need to implement them arise.

KW California appreciates your cooperation in these matters and thanks you for your time and attention in reading and distributing this notice.

If you have any questions or need additional information, please do not hesitate to call me at (800) 633-8744.

Sincerely,

Roy Baggett
Manager of Environmental Affairs
KW Plastics of California, Inc.

APPENDIX 11

EMERGENCY PROCEDURES CHECKLIST

EMERGENCY PROCEDURES CHECKLIST

#1 - #8 (To be completed by the Supervisor <u>During the Accident</u>)

*1. Did the contaminant release enter the navigable waters of the United States?

Yes ☐ No ☐

If yes, see Notification Requirements (#10).

Provide brief explanation of emergency conditions as outlined in Items 2 through 9.

*2. Facility: KW California
1871 Sunnyside Court
Bakersfield, California 93308

*3. Name of Emergency Coordinator completing this checklist:

_____ Telephone Number _____

*4. Date: _____ Time of Incident _____

*5. Exact location of the spill, chemical release, or emergency incident:

_____

*6. Material Involved:

NAME	QUANTITY

*7. Source of Spill/Chemical Release:

_____

_____

*8. Cause of Spill, Chemical Release or Emergency Incident:

_____

_____

#9 - #18 (To be completed by the Emergency Coordinator)

*9. Name of nearest body of water threatened or involved in spill/chemical release:

_____

*10. Notification Requirements:

a. If the incident involves one of the following:

1. A spill *exceeding reportable quantities escaping* facility building

2. An emergency which *threatens public health and/or the environment*.

IMMEDIATELY NOTIFY:

Toxic Substances Control Division (916) 255-3553

Date and Time Notified: _____

California notification procedures will include the contacting of EPA Region 9 and the National Response Center (NRC). However, contact the NRC at (800) 424-8802 to ensure notification.

Be prepared to provide response agencies with the information marked with an asterisk (*) on this checklist. Response agencies may also be called for assistance inside facility boundaries.

b. If evacuation of local areas is advisable, IMMEDIATELY NOTIFY APPROPRIATE LOCAL AGENCIES and be available to help officials in evacuation planning.

11. Is evacuation of the plant necessary? Yes ☐ No ☐

12. Are Outside Emergency Response Agencies needed?

Yes ☐ No ☐

If yes, contact primary emergency response agencies as needed. If additional assistance is needed call second agency.

Fire ..... Bakersfield, California 324-4542

Police ..... Bakersfield, California 327-7111

Ambulance ..... Bakersfield, California 327-4111

RECORD INFORMATION BELOW:

Agency Contacted	Person Contacted	Time Called	Time on Scene

14. Evacuation of areas outside the facility necessary?

Yes ☐ No ☐

If no, then go to question 15.

If yes, contact Police to aid in the evacuation. Record the following information:

Agency Contacted	Person Contacted	Time Called	Time on Scene

(If there is only in-house evacuation, then police contact is not necessary.)

15. Extent of Injuries, in any:

*16. Description of Response Activities:

17. For emergency chemical information assistance:

    Call CHEMTREC (800) 424-9300

18. For additional assistance, as needed:

    Contact: E. Roy Baggett at (800) 633-8744 or (205) 566-4869

REPORTING FORM FOR EMERGENCY EVENTS

Name, address, and phone number of owner and operator

Name, address, and phone number of facility

Date, time, and type of incident (e.g. fire, explosion, etc.)

Name and quantity of material(s) involved

Extent of injuries (if any)

Assessment of actual or potential hazards to human health or the environment (if applicable)

Estimated quantity and disposition of material recovered from the incident

APPENDIX 12

TRAINING DIRECTOR CREDENTIALS

E. Roy Baggett, B.S., M.S., CHMM
P. O. BOX 138
Troy, Alabama 36081
334-566-4869

FORMAL EDUCATION AND RESEARCH BACKGROUND

August 1977
Master of Science in Environmental Health, East Tennessee State University, Johnson City, Tennessee
Thesis: Research on Organophosphate Pesticides (Land Application)
Title: Isolation of bacteria in natural soil environment responsible for degradation of an organophosphate, malathion. Research led to selected bacteria for activated sludge plants. POTW's can introduce the bacteria to protect sludge M/F ratios.

November 1970
Bachelor of Science in Mathematics and Minor in Computer Modeling, Berry College, Mount Berry, Georgia

June 1966
Darlington Prep School, Rome, Georgia

CURRENT SPECIAL PROJECTS

Involved with Superfund Projects as follows:

Sapp Battery Site - Designated Project Coordinator for managing historic review and proposal to EPA Region IV to increase soil clean-up numbers. Original numbers were 79 and 109 for lead. I reviewed geological/hydrogeological data and historic actions. Data as gathered was placed in a risk based review for EPA RPM and EPA Athens Lab. We secured 500/2500 numbers. These actions saved over 7 million dollars. I coordinated over 50 professionals in seeking these design (RI/FS) changes.

Cedartown Industries - Designated Project Coordinator/Contractor on old smelter site. I managed site evaluation and pre-RI/FS waste removal. These actions were taken since no need was required to study an accepted dirty site. All buildings, surface soils (6") and debris were removed. 1.5 million was spent prior to RI/FS review. EPA accepted the approach. The RI/FS was completed and wells placed. All soils and areas were then remediated at 2.1 million. The total project was 3.6 million. This was a 4.2 million savings over EPA ROD and proposed actions. This site is planned from NPL removal on June 20, 2001.

Tarracorp, ILCO, and two other sites are under review.

Own and operate RBCHMM, a small professional consulting group. Company takes on selected special projects.

WORK HISTORY

September 1988 to Present

Sanders Lead Company, KW Plastics, and Wiley Sanders Truck Lines, Troy, Alabama; Manager of Environmental Affairs. Responsible for coordinating RCRA, Cercla, and Sara programs. Incorporate actions to insure compliance under interim status required to meet Part A permit. Secured Part B permit and manage operating requirements with personnel training, laboratory overview, plan submissions, and remediation programs.

Company is involved with hazardous waste shipping, receiving, treatment, recycling, and disposal. This required attainment of programs adequate to meet federal hazardous management guidelines so inspections could be passed by Federal and State inspectors.

Duties include OSHA compliance at lead recycling operations. Part B permit activities are maintained to insure permit compliance. Actions require insurance audit and attainment, trust fund placement, and site safety activities. Responsibilities include health, safety, OSHA inspection and interviews, compliance program for hazard communications, Tier I, Tier II, Form R, and annual hazardous waste report.

These activities co-exist with Part B RCRA responsibilities and inspection requirements. Actions include monitoring and data interpretation. RCRA inspections along with air monitoring programs are on-going with assigned staff members. MACT standard and Title V Air permit activities are on-going for 1999 compliance.

Other company services include trucking under 49CFR and plastic recycling which requires RCRA and OSHA compliance programs.

Staff includes 35 technical staff, 16 monitoring staff and 5 department heads. Manage a 5M plus budget and this includes legal counsel interfacing. Manage 25m budget for superfund projects.

Also, due to company's past activities I handle superfund sites for PRP groups and coordinate RI/FS along with selected clean-up method. To date I have completed two NPL site clean-ups.

March 1980 - September 1988

Southeastern Waste Treatment, Inc., Dalton, Georgia. Operations Chief, Environmental Coordinator, and Chief Consultant. Duties were to coordinate environmental compliance with the State of Georgia Environmental Protection Division and the Environmental Protection Agency, Region IV. Southeastern operated two waste treatment facilities. One was for the incineration of contaminated liquid materials and the other was a liquid filtration/separation facility (waste water treatment). Special duties included the development of new treatment markets such as land disposal site operations along with special waste storage facilities. Our company hired out consulting jobs and I was assigned as project manager for the following:

Environmental Consultant, Earth Management, Inc. EMI was a division of IU International. IU owns Ryder trucks. Duties included business development in S.E. United States. I reviewed and made recommendations on business acquisitions. I worked in Horsham, PA and commuted from Atlanta.

Chief Consultant, Southeastern Environmental Services. Duties were to develop market areas in Environmental Engineering.

Transportation Environmental Manager, Lee Cylinders, Cedartown, Georgia. Duties were to manage crib, package and valving, painting, and shipping department. I employed approximately 25 employees and had a monthly budget of approximately 180k. I handled all environmental programs.

Environmental Consultant, Peterson Engineering, Gulf Shores, Alabama. I handled field consulting for environmental analysis contracts and was responsible for laboratory analysis and equipment. Duties were to represent firm to professional companies in the area of occupational/environmental analysis fields. Review needs of geographic area along with project needs. Worked as management level project manager with inter-discipline staff members such as surveying, testing, and laboratory personnel. Assign staff members as required to complete contracts. Maintain follow-up with clients to insure satisfaction. Worked with budget and staffing requirements to insure operational integrity. Work was based in the area of air, water, and hazardous waste management projects. This included site remediation under RCRA, Cercla, and Sara. I was involved with the following companies and/or organizations: Environmental Development Systems (Exxon Contractor), Baldwin County Water Treatment Authority (privately owned facility), State of Alabama (highway department and employment sections), General Investment Corporation (environmental development co.), Confidential Client (Sara closure), and Confidential Client (Cercla Inspections).

April 1982 to April 1983 (Part-time)

College Professor, Floyd Junior College, Rome, Georgia. I worked at the college as a visiting professor in chemistry and biology. I also taught for the Floyd County School System along with managing teaching/consulting contracts at Lee Cylinders and the State of Alabama. Handled recruiting program at college to seek environmental and health specialists for compliance fields. EPA sponsored grants to meet the challenge of superfund demands.

1971 to 1980

Program Consultant, Northwest Georgia Regional Health Advisory Council. Council was formed as a result of the 1966 Solid Waste Management Act. A professional environmental group was developed and the Environmental Protection Agency, Region IV, was responsible for the administration of the program within the counties that participated in the organization. Duties were to plan, develop, and institute environmental programs in counties which participate in council activities. Council programs included water pollution control and solid waste management activities. I worked for two years in the development program out of the field office in Rome, Georgia. Responsibilities included review of grant applications, engineering reports, and budget requests. Field investigations, along with technical assistance to county officials were performed. Based upon investigations, biological testing, and monitoring programs, recommendations were developed and made available to the collective council. Based upon federal regulations, waste water treatment plants, solid waste disposal sites, incinerators, and/or air pollution programs were put into effect. These were based on the 1966 Solid Waste Management Act.

Field Coordinator and Environmental Specialist, State of Georgia Environmental Protection Division, Land Protection Branch. The state formed its own environmental protection division in 1972. I was hired by the Land Protection Division in 1973. In 1973 to 1976 I was assigned to the Municipal Solid Waste Control Unit. I was responsible for administration of the state rules and regulations for solid waste management (industrial and land disposal sites). Area of assignment included inspection of existing solid waste storage, collection, and disposal facilities; evaluation and determination of their status along with recommendations were developed and submitted to responsible officials. Follow-up was accomplished with either a cooperative plan or litigation.

In September, 1976 I was awarded a state educational grant to complete graduate degree in Environmental Science. I attended East Tennessee State Graduate School.

In September, 1977 to 1980 I was assigned to the Industrial and Hazardous Waste Control Unit. I was responsible for administering the Industrial and Hazardous Waste Control Program's Rules and Regulations. Routine duties included inspection, enforcement, and control of all facilities that engaged in storing, transporting, disposing of industrial and/or hazardous waste. Special assignments included guidelines and administrative policy for controlling and surveying pesticide producers state-wide. Additional responsibilities included development guidelines for locating and constructing hazardous waste

sites. Assisting city, county and industrial officials in management practices of toxic substances upon areas of assignments. Under the Resource Conservation and Recovery Act (RCRA of 1976), our office was responsible for developing a program to aid industrial officials in handling toxic substances from "Cradle to Grave". The substances included compounds on the federal toxic substances list or any which our office determined a hazardous compound through EPA testing procedures. Special duties included the development of a program to survey, identify, and classify all industrial facilities in Georgia. This project required the supervision of two staff technical personnel, along with the organization of an emergency response team. The team was staffed with personnel from geological survey, water quality, and industrial and hazardous waste management groups. Team project responsibilities included the completion of the Eckhardt Congressional Survey, along with identification of any potential hazardous disposal sites that existed within Georgia. Also, recruit Environmental Specialist's within the state college systems. These programs led to Cercla activities which are now known as "Superfund".

SPECIAL TRAINING

1998 - Speaker on RCRA Compliance Issues to California Insurance Carriers for Environmental Insurance

1997 - Presented an Insurance Review Process at Higgins and Johnson Conference, Atlanta

1996 - Presenter at Troy State University as a Visiting Professor for Environmental Compliance Activities

1995 - Presentation at Bakersfield, California Recycling Plant on Permit Issues for Resource Recovery Plant

1994 - Insurance Carrier Meeting on Risk Evaluation Technology, Birmingham, Alabama

1993 - EPA Region IV, Presented Cercla Activities to Insurance Carriers and Presented Program on Environmental Risks

1992 - Certified Hazard Material Manager #3004

1992 - Speaker at National Safety Council

1991 - EPA Region IV Program Presenter

1990 - Presentation on Ground Water Recovery at EPA Region IV Ground Water Conference

1989 - Presentation to Electric Vehicle Association on Battery Recycling, St. Helena, CA

1988 - Superfund Conference, Washington, D.C.

1987 - Certified Waste Water Treatment Operator

1986/1988 - Consultant to the State of Alabama for Training Response Professional, Montgomery, Mobile, and Birmingham, Alabama (Haz Mat Training)

1985 - College Visiting Professor in Health and Environmental Programs, Floyd Junior College, Rome, Georgia

1984 - Program Participant at Floyd Junior College Recruitment Programs for Sanitation Specialists, Rome, Georgia

1983 - Conference Speaker on Recruiting Environmental Professionals, Floyd Junior College, Rome, Georgia

1982 - Conference on Professional Placement for Environmental Regulators, Atlanta, Georgia

1981 - 2nd Annual Hazardous Waste Management Program, Washington, D.C.

1980 - Annual Hazardous Waste Management Program, Washington, D.C.

1979 - 10th Annual Conference of Golf Course Superintendent, Program Participant, Athens, Georgia

1979 - Symposium on Pesticide Management, Callaway Gardens, Georgia

1978 - Registered Professional Sanitarian #828 (Georgia)

1978 - Workshop and State-of-the-Art Conference, Reston, Virginia

1977 - Certified Lab Technician

1977 - National Environmental Health Association Member

1977 - Workshop on Pesticide Management, Hilton Head, South Carolina

1976 - Seminar on Hazardous Waste Management, EPA, Johnson City, Tennessee

1975 - Management in Government, Certified Public Managers Program, Atlanta, Georgia

1974 - Seminar on Management and Disposal of Sea Food Waste, Program Participant, St. Simon Island, Georgia

1973 - Seminar on Disposal of Wastes in High Water Table Areas, EPA, Orlando, Florida

1972 - Seminar on Site Assessment for Solid Waste Sites, EPA, Cincinnati, Ohio

1972 - Seminar on Solid Waste Management, Atlanta, Georgia

ATTACHMENTS: Examples of Selected Professionals Presentations

Recent Presentations or Training

2002 Presentation at Alabama Self-Insurance Associations
Title : Managing a Crisis and Clean-up of a Historic Disposal Site

2002 ISO Update for Lead Auditor
Certified to ANSI-RAB

2002 Technical Presentation to California DTSC on Air Management Techniques for Fugitive Emissions

2001 Assisted in Presentation on Ground Water Corrective Action at Sanders Lead Company

2001 Presentation to Berry Remediation on SPCC Elements and Requirements

2001 Completed ASTM Course on Site Assessments
Title: Tools to Complete a Certified Review ASTM E1527-97