

SET ENVIRONMENTAL, INC.

*HOUSTON FACILITY
SITE PROFILE*

SET ENVIRONMENTAL, INC. SITE PROFILE

TABLE OF CONTENTS

Revised - September 2006

TOPICS	PAGE
General Information	3
Site Description	4
Financial Information.....	5
Regulatory Information.....	6
Administrative Information	6
Waste Processing Systems.....	9
Emissions Control Systems.....	10
Waste Treatment Information.....	11
Safety and Training	11
Laboratory Information.....	12
Record Keeping and Required Forms	12
Approved Disposal Facilities List	13

EXHIBITS

- A. Facility Map
- B. Certificate of Insurance
- C. Part B Permit
- D. Safety Equipment
- E. Most Recent Agency Inspection Correspondence
- F. Organizational Structure
- G. Training Program
- H. Waste Profile Forms
- I. Notification for Waste Restricted from Land Disposal (LDR)
- J. Waste Scheduling Notification Form

SET ENVIRONMENTAL, INC.

SITE PROFILE

I. GENERAL INFORMATION

NAME: SET Environmental, Inc.

MAILING ADDRESS: 5738 Cheswood
Houston, Texas 77087

FACILITY ADDRESS: 5743 Cheswood
Houston, Texas 77087

TELEPHONE: (800) 598-7328 or (713) 645-8710

FAX: (713) 649-1027

CONTACTS: Dave DeVries
President

Fred Schwartz
General Manager

Walter (Chuck) Kilgus
Facility Manager

Scott Skoog
Facility Engineer

Daniel A. Didier
Compliance Director

Pamela Page Nowlin
Sales Manager

OFFICE HOURS: 8:00 a.m. to 5:00 p.m. (Weekdays)

RECEIVING HOURS: 8:00 a.m. to 4:00 p.m. (Weekdays)

II. SITE DESCRIPTION

LAYOUT

The facility is situated on a one (1) acre site and has three (3) permitted storage buildings (a map of the facility is included as Exhibit A):

1. Warehouse - used for various types of hazardous waste storage, drum cleaning, waste compaction and metal drum compaction. This storage building has a concrete base that is coated with an epoxy sealant. In order to prevent run-on, run-off and accumulation of rainwater this building is roofed, has walls and is surrounded by a six-inch high concrete curb. Six-inch high concrete curbs separate incompatible material. Each separate storage area has the capacity to contain a minimum of 10% of the volume of waste stored in that area and 100% of the largest container in that area.
2. Process Building - used for chemical treatment, compressed gas and lab pack processing. This storage building also has a concrete base, is roofed and has walls. A six-inch high concrete secondary containment curb also surrounds this building. This building houses two permitted container storage units (CS-1 and CS-3) and four chemical treatment tanks that will be described later (PT-2, PT-5, PT-11 and WW-2).
3. Ignitable Storage and Processing Building - used for the storage of flammable wastes in containers and blending organic liquids in tanks for reuse as secondary fuels. This container storage area has a concrete base, is roofed and enclosed on three sides. The container storage area is sloped to a low point in the center of the building and has the capacity to contain a minimum of 10% of all waste and 100% of the largest container stored in this area. This building is divided into three separate permitted storage units (CS-4, CS-5 and CS-6) and has four fuel blending tanks (FB-1 through FB-4).

LOCATION

The facility is located outside the 100-year flood plain. The surrounding area within one mile of the facility is classified as mixed commercial, residential and industrial. The nearest home is 1,100 feet north, the nearest school is 3,500 feet southeast and the nearest surface water (Sims Bayou) is 7,250 feet southeast of the facility. There are no down gradient drinking water wells within one (1) mile.

SECURITY

A six (6) foot high chain link fence topped with three (3) strands of barbed wire encloses the entire facility. Gates that are locked when facility personnel are not present control the entrances to the facility. On-site security personnel patrol the facility during non-operational hours. As required by 40 CFR 264.24, signs that state "Danger - Authorized Personnel Only" are posted on the perimeter of the site. These signs are posted in English and are visible from at least 25 feet.

FACILITY HISTORY

SET Environmental, Inc. was incorporated in the State of Illinois on April 4, 1979 and purchased the facility from Nuclear Sources and Services Inc. (NSSI) on April 8, 1988. At the time of purchase, the facility was under interim status and had been operated by NSSI since 1985.

The site was used for agricultural purposes up to 1930. Between 1930 and 1981 the property was privately owned. During this time no entities were identified that would suggest any on site industrial or commercial activities. Aerial photographs taken in 1969 and 1975 show the property to be vacant. Nuclear Sources and Services, Inc. (NSSI) purchased the property in 1981. NSSI began construction of the existing facility in 1985 for the purpose of hazardous waste treatment and storage.

Prior to purchasing the facility, SET Environmental hired an independent engineering and consulting firm to conduct a pre acquisition environmental risk assessment of the property. The assessment included sampling of soil and groundwater. There were no signs of contamination observed in the groundwater; however, low concentrations (highest level = 3.1 ppm) of PCBs were detected in the upper foot of soil at the southern most end of the facility. Soil core analysis at two and three foot depth did not show any contamination. The soil showing low concentrations of PCB's in the upper foot was excavated and disposed of in April of 1988.

SET Environmental, Inc. was issued a Part B Permit on October 4, 1990 from the Texas Natural Resource Conservation Commission and December 14, 1990 from the United States Environmental Protection Agency. SET Environmental's RCRA permit was renewed on August 12, 2002 and will expire on August 12, 2012. The facility name was changed from Treatment One, Division of SET Environmental to SET Environmental, Inc. in March of 2002 to better convey the comprehensive services offered by the company.

III. FINANCIAL INFORMATION

CORPORATE OFFICE: SET Environmental, Inc.
450 Sumac Road
Wheeling, Illinois 60090
(800) 634-6856 or (847) 537-9221

FORM OF OWNERSHIP: Private Corporation

COMPANY OFFICERS: Calvin Taming, CEO
Bernard Taming, Secretary/Treasurer

DUN & BRADSTREET NO: 09-897-9297

CLOSURE PLAN MECHANISM: Trust Fund

CLOSURE COST ESTIMATE: \$500,592 (Last Update: December 2005)

INSURANCE CERTIFICATE: See Exhibit B

NUMBER OF EMPLOYEES: Approximately 201 (Total)

IV. REGULATORY INFORMATION

USEPA ID NO: TXD055135388

STATE REGISTRATION NO: 50267

PART B PERMIT NO: HW-50267-001 (See Exhibit C)

SIC CODE: 4953 Refuse Systems
4953-01 Hazardous Waste Collection and Distribution

NAICS CODE: 562211

REGULATORY STATUS: SET - Houston is currently under no enforcement action by any regulatory body.

PERMIT WRITER: Texas Commission on Environmental Quality
Ms. Vaishali Tendolkar, MC130 (512) 239-5747
Texas Commission on Environmental Quality
Waste Permits Division
Industrial and Hazardous Wastes Permits Section
P.O. Box 13087
Austin, TX 78711-3087

INSPECTION OFFICIAL: Texas Commission on Environmental Quality, Region 12
5425 Polk Avenue, Suite H
Houston, Texas 77023
Mr. Bruce Arnett (713) 767-3614

V. ADMINISTRATIVE INFORMATION

BACKGROUND OF KEY PERSONNEL:

Dave DeVries, President, B.S. Business Administration
1997 - Present – SET Environmental, Inc.
1994 - 1997 - General Manager; Treatment One
1991 - 1994 - General Manager; SET Environmental, Inc.- Remediation Division
1986 - 1991 - Various Positions; SET Environmental, Inc.

Frederick J. (Fred) Schwartz, General Manager, M.B.A. Marketing and Computer Systems,
B.S. Chemical Engineering
1999 - Present – SET Environmental, Inc.
1995 - 1999 - Concept Chemicals, Inc. General Manager
1987 - 1985 - RUST Remedial Services, Inc. (Formerly Chemical Waste Mgmt., Remedial Services), Group Manager
1983 - 1987 - Rollins Field Services, Inc., Business and Marketing Manager

Corwin Johnson, Approvals Manager, B.S. Biology, Minor Chemistry
1998 - Present – SET Environmental, Inc.
1995 - 1998 - Operations Manager; Treatment One
1989 - 1995 - Environmental Field Services Manager; Treatment One

Bob Mann, Facility Chemist, M.S. Chemistry
1989 - Present – SET Environmental, Inc.
1987 - 1989 - ENSCO; Chief Chemist

Scott Skoog, Facility Engineer, B.S. Chemical Engineering, PE
1995 – Present – SET Environmental, Inc.
1993 - 1995 – Operations Manager, Treatment One
1985 - 1993 - SET Environmental, Inc; Permitting

Shelia Armstrong, National Marketing Manager, B.A. Chemistry
1996 - Present – SET Environmental, Inc.
1990 - 1996 - Technical Sales Representative; Treatment One
1989 - 1990 - Technical Env. Systems; Technical Sales Representative
1987 - 1989 - Rollins Environmental; Technical Sales Representative

Daniel A. Didier, Compliance Director, B.S. Forestry, M.S. Candidate Environmental Science,
Specialization Industrial Hygiene, Certified Hazardous Materials Manager, 1993
1988 - Present – SET Environmental, Inc.
1986 - 1988 - SET Environmental, Inc; Project Manager

Walter (Chuck) Kilgus, Facility Manager, B.S. Biology, Minor Chemistry
1998 – Present – SET Environmental, Inc.
1995 - 1998 – Environmental Field Services Manager, Treatment One
1991 - 1995 - Lab Pack Approvals Coordinator; Treatment One

Pamela Page Nowlin, Sales Manager
1996 - Present – SET Environmental, Inc.
1992 - 1996 - Shipping, Receiving & Inventory/Administration Manager
1991 - 1992 - Canonie Environmental; Business Development Manager
1990 - 1991 - MSP Technical Service; District Account Manager
1986 - 1990 - Chemical Waste Management; Customer Service

VI. WASTE PROCESSING SYSTEMS

ORGANIC BLENDING: SET Environmental, Inc. currently operates four (4) 4,000-gallon RCRA permitted carbon steel tanks. Each tank has been equipped with an agitator, pressure release valve and conservation vent.

Corrosion protection is accomplished through proper management practices such as maintaining chlorine content below five percent and pH concentrations above seven. An independent professional engineer inspects tanks every three (3) years for deterioration. All ancillary equipment for these tanks is above ground. The fuel blending tanks and ancillary equipment have a secondary containment structure that holds 7,529 gallons and is lined with a 100 mil HDPE liner. These tanks are covered to prevent the accumulation of rainwater. Each tank has been raised off the ground with the use of I beam supports to facilitate daily inspections.

The types of waste primarily handled in these tanks are organic liquids (solvents and paints).

CHEMICAL TREATMENT: There are four tanks that make up the chemical treatment system. The tanks: identification numbers are PT-2, PT-5, PT-11 and WW-2; permit numbers are 8, 14, 9, and 15 and capacities are 1,700, 7,000, 1,615, and 6,500 gallons respectively.

All four tanks and associated ancillary equipment are:

- (1) Above ground;
- (2) Equipped with sealed secondary containment capable of containing the contents of the largest tank;
- (3) Equipped with agitators;
- (4) Inspected every three (3) years for integrity by an independent registered professional engineer, and are;
- (5) Inspected each workday by qualified facility personnel. The purpose of this inspection is to identify any leaks, corrosion or other system failure in the tanks, ancillary equipment and secondary containment.

PT-2 and PT-11 tanks and ancillary equipment are:

- (1) Equipped with corrosion protection (Kynar liners);
- (2) Equipped with agitators, pH, temperature and oxidation potential monitors;
- (3) Connected to an air emissions control system that is composed of a recirculating caustic counter current packed scrubber in line with an 8000-pound activated carbon bed;

The treatment processes designated for each tank are as follows: PT-2 is used for neutralization and hydrolysis, PT-5 is used for caustic solution storage, WW-2 is treated waste water storage and PT-11 is used primarily for hydrolysis of water reactive acids and neutralization of liquids and gases.

*GAS CYLINDER
PROCESSING:*

SET Environmental, Inc. has a variety of scrubbing techniques used for the treatment and disposal and recycling of compressed gases. All processing activities take place under emission-controlled atmosphere. The use of PT-11 (Chemical Treatment Unit) allows for remote handling of the gas cylinders. The flow of gases through the scrubbing systems is controlled from outside the treatment building, thereby eliminating potential exposure to the gases.

Several portable processing units are used for the treatment of compressed gases. Each primary treatment unit is equipped with a back-up unit of equal capacity. These portable processing units are connected to an air emissions control system consisting of a caustic scrubber to remove acidic fugitive emissions and venturi scrubber to remove particulates.

Two large enclosures, maintained under negative pressure are utilized while connecting compressed gas cylinders to manifold systems. One enclosure is connected to a caustic scrubber and the other is connected to 2-6000 pound activated carbon beds. Each system is designed to prevent employee exposure and capture any potential fugitive emissions.

In addition to processing compressed gases, SET Environmental, Inc. has the capability to overpack or repack cylinders in poor condition and to process cylinders with inoperable valves.

VII. EMISSIONS CONTROL SYSTEMS

*ACTIVATED CARBON
BEDS:*

Three separate activated carbon beds are utilized throughout the facility. The following chemical processing areas have emissions controlled with activated carbon.

1. Organic blending area
2. Two chemical treatment tanks (PT2 and PT11)
3. Portable Gas Cylinder Processing Units

CAUSTIC SCRUBBERS:

The facility has three caustic scrubbing units. Two are vertical, counter current, recirculating, packed towers. The third unit is a horizontal, caustic bath scrubber.

The following areas have emissions controlled with caustic scrubbers.

1. Chemical Treatment Tanks (PT2 and PT11)
2. Gas Cylinder Processing Units and Enclosures
3. Lab Pack Consolidation Enclosure

VIII. WASTE TREATMENT INFORMATION

WASTE MANAGEMENT METHODS: Fuel Blending, Neutralization, Oxidation/Reduction, Hydrolysis, Repackaging, and Storage.

PACKAGING REQUIREMENTS: SET Environmental, Inc. will only accept DOT authorized packagings for shipments of hazardous materials; non-hazardous materials may be shipped in non-DOT packagings. SET Environmental, Inc. Lab Pack Protocol is available upon request.

UNACCEPTABLE MATERIAL: TSCA regulated PCBs, Radioactive Material, Explosives, Infectious Wastes and Dioxins.

EMPTY DRUM HANDLING: All drums are power washed and are either reused by SET Environmental, Inc. or are rendered unusable. Metals drums are crushed and sent off-site for scrap metal recycling. Poly drums are cut up and shipped off-site for land disposal.

IX. SAFETY AND TRAINING

TRAINING: SET Environmental, Inc. has developed a comprehensive training program structured into five areas: Administrative, Safety, Regulatory, Technical and Operational. Initial training includes 40 hours of classroom instruction. Each facility employee is certified by the American Red Cross in CPR/Standard First Aid. Continued training includes a minimum of eight hours annual review complimented with monthly safety meetings.

MEDICAL MONITORING: SET Environmental, Inc.'s medical surveillance program includes a pre-employment and an annual physical examination as well as an examination upon any suspected exposure and upon termination of employment. A physician experienced in industrial medicine monitors medical surveillance results.

SAFETY EQUIPMENT: The facility is equipped with an intercom system capable of providing immediate emergency instructions to facility personnel. There are several phones on site that can be used to summon emergency assistance. Emergency response and first aid stations are located near each processing area. See Exhibit D for description emergency response equipment. Each building is equipped with an automatic fire suppression system. The system activates when thermal detectors are exposed to a temperature of 190° or a temperature rise of 15° F in one minute or less. Once activated, an alarm sounds to evacuate employees and a monitoring service contacts the Fire Department.

X. LABORATORY INFORMATION

PERSONNEL: Experienced, degreed chemists staff SET ENVIRONMENTAL, INC.'s laboratory. SET's laboratory staff in Wheeling, Illinois provides additional laboratory and analytical support.

EQUIPMENT: The Houston lab is equipped with a flashpoint tester, a bomb calorimeter, halogen analyzers, muffle furnace, pH meter, Karl Fischer titration unit, Atomic Absorption Unit, hydrometer, FTIR, and centrifuge. The Wheeling lab is equipped with an infrared spectrophotometer and gas chromatograph, mass spectrophotometer.

WASTE ANALYSIS: A minimum of ten percent of the containers are sampled for each wastestream in a shipment although SET Environmental, Inc. typically takes a composite sample of 100 percent of the containers. The sample is then analyzed to verify that wastes received are those described on the wastestream profile. Depending on the type of waste, may include: % water, flashpoint, pH, BTU, %halides, specific gravity, reactive sulfide, reactive cyanide, suspended solids, dissolved solids, %ash, qualitative test for peroxides and oxidizer characteristics. Lab packs are unpacked and checked for conformance with approved lab pack inventories.

If the waste stream or lab pack does not conform to previously approved paperwork, SET Environmental, Inc. will contact the generator in an effort to resolve the discrepancy. If the discrepancy requires further investigation, SET Environmental, Inc. will conditionally accept the waste if authorized by the generator until further analysis can be conducted. If the discrepancy cannot be resolved (this rarely occurs) the waste will be returned to the generator or an alternate facility.

XI. RECORD KEEPING AND REQUIRED FORMS

INTERNAL RECORDS: The following records and documents are maintained by SET Environmental, Inc.: Contingency Plan (arrangements with local authorities included), Spill Prevention and Counter Measure Plan, Detailed Operating Record, Waste Minimization Program, Waste Analysis Plan, Inspection Schedule, Training Documentation including Job Title and Written Job Description for each position, and the name of each employee filling the position.

WASTE PROFILE: Waste Profile sheets are required for each individual wastestream.

LAB PACK INVENTORIES & SUMMARY: Lab Pack inventories must be submitted with a Lab Pack summary form signed by the packaging agent and generator for each Lab Pack project.

CYLINDER PROFILE: Cylinder Profiles must be submitted with each batch of cylinders for approval. In addition to the completed Gas Cylinder Profile, a Gas Cylinder Inspection and Evaluation Report must be completed and attached to the Profile. The Gas Cylinder Profile must be signed by the packaging agent and generator. If at all possible, include pictures of each cylinder.