



## **Facility Information and Environmental Compliance Package**

**For The Facility  
at  
2303 Dalton Industrial Court  
Dalton, GA 30721  
(706) 270-8635**

**[www.IMACCcorp.com](http://www.IMACCcorp.com)**

**IBC RECONDITIONING**

**PLASTIC RECYCLING**



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## **1.0 FACILITY IDENTIFICATION**

Facility Name	IMACC Corporation Dalton – IBC Reconditioning/ Plastic Recycling
Facility Address	2303 Dalton Industrial Court Dalton, GA 30721
Phone #	706.270.8635
Fax #	706.259.8071
EPA ID #	GAR 000 014 878
Tax ID #	942949884
SIC Code	7699 – Misc Repairs, NEC
Corporate Office	IMACC Corporation 2303 Dalton Industrial Court Dalton, GA 30721

## **2.0 Company Organization**

### **Facility**

General Manager	Brandon Cutt
Raw Material Specialist	Tishia King
Account Manager- Carolinas	Joe Hyatt
Account Manager- KY	Scott Richards
Logistics Manager	Kelly Stevenson
Production Supervisor	Miguel Martinez
Human Resources	Kelly Stevenson

## **2.1 Corporate**

President, IMACC Corp  
VP Finance, IMACC Corp

Peter J. Cutt  
Michael Holmes

## **3.0 Permits and Authorizations**

The Permit status for the Dalton facility is Conditionally Exempt Small Quantity Generator.

### **3.1 Permits**

EPA ID Number	GAR 000 014 878
Air Permit	Not Required
Wastewater Discharge	Q-060110-C
Storm water	Not Required
DOT Registration	M5578
Tax ID #	942949884

## **4.0 Facility Description**

#### **4.1 Location**

The IMACC facility is located at 2303 Dalton Industrial Court in Dalton, Georgia.

Location Map presented as Exhibit 1

#### **4.2 Site and Surrounding Areas**

The Dalton facility is situated on approximately 5 acres with 1 building. IBC reconditioning and plastic recycling take place in the production building.

Building # 1, (Production building) is approximately 60,000 square feet. This building houses all reconditioning and recycling activities.

Raw Drums and IBCs are stored on pavement in the area directly south of the main production building. This area is gated and fenced.

The area surrounding the facility is industrial, with carpet manufacturing being the primary industry.

Site Map presented as Exhibit 2

#### **4.3 Physical Setting and Site Characteristics**

The geographical coordinates are latitude 34°42'51.1" and longitude 84°58'1.2", with the average ground surface elevation approximately 750 feet above mean sea level.

The U.S Department of Agriculture's Soil Conservation Service indicates that the soil component name for the facility is Townley. The soil surface texture is a silty loam, while the hydrologic group is Class C. This type soil has slow infiltration rates, has layers impeding downward movement of water, or soils with moderately fine or fine textures. The depth to the water table is more than six feet, while the depth to weathered bedrock is approximately 40 inches.

## **5.0 Container Reconditioning**

### **5.1 Container and IBC Acceptance Criteria**

Before an empty container can be sent to this facility for processing, it must first be approved by the Environmental Department. Approvals are necessary due to the presence of trace amounts of residue that may still be in an empty container.

Some of these residues are an unacceptable risk from an employee health and safety standpoint, are not compatible with the cleaning process, or are specifically prohibited by permit conditions.

New Customers are required to submit a Material Safety Data Sheet for the product the container last contained. The MSDS is reviewed and a decision is made as to its suitability for acceptance at the facility.

#### **Acceptance Policy presented as Exhibit 7**

### **5.2 IBC Reconditioning**

5.2.1 The IBC reconditioning process consists of multiple high pressure and temperature cleaning stations. Hot water is used in the cleaning process. Use of cleaning chemicals such as sodium hydroxide has been discontinued.

All IBCs are thoroughly cleaned, missing or broken parts are replaced, and all bottles are leak tested at either 2 psig for production leak test, or at 2.9 psig for UN leak test. Bottles that fail are taken out of service and destroyed by grinding/bailing and recovery of the plastic.

### **5.3 IBC/ Poly Drum And Plastic Recycling**

5.3.1 IBC Bottles and Poly Drums that are stained and cannot be cleaned or that fail the leak test are destroyed by grinding/bailing and recovery of the plastic.

5.3.2 IBCs/Poly Drums and other plastic scrap is generated or otherwise acquired for the sole purpose of recovering the plastic for recycling. The plastic is sold to another recycler who will further process it by washing, extruding and pelletizing it. They will then sell the pelletized plastic to companies that make coaxial cable and 55 gal poly drums.

#### **5.4 Transportation Services**

All Drums, IBCs and Plastic Scrap are delivered to the Dalton facility by either common carrier or customer delivery. IBCs and Drums arriving at the facility are inspected as they are off-loaded. Containers sent in with excess heel are documented and brought inside for disposal.

#### **5.5 Waste generation and disposal**

Waste is generated as a result of the various reconditioning processes. Non-hazardous wastes are segregated at the point of generation and are not commingled. The Dalton facility is permitted as a Generator. The current status is Conditionally Exempt Small Quantity Generator.

## **6.0 Processes Generating Wastes**

### **6.1 Primary Wastes**

#### **Waste Stream**

Wastewater Treatment Sludge  
Filters/Sludge/Pour Off

#### **Process Generating**

Wastewater treatment  
Filtering of Process Liquids  
Pour off of Non-Hazardous  
Residues

Hazardous wastes are not generated at this time. Characterization and profiling of hazardous waste would be conducted should corrosive, ignitable, or other types of hazardous waste be generated.

## **7.0 Waste Stream and Disposal Facility**

IMACC CORPOATION - DALTON FACILITY  
WASTE STREAMS

WASTE STREAM	HAZ/NON-HAZ	DISPOSAL FACILITY
WASTEWATER	NON HAZ	DALTON UTILITIES
FILTER MEDIA/POUR OFF	NON HAZ	MARION ENVIRONMENTAL
IWW TREATMENT SLUDGE	NON HAZ	MARION ENVIRONMENTAL
SOLID WASTE (TRASH)	NON HAZ	NORTH GEORGIA DISPOSAL
SCRAP STEEL	RECYCLABLE	Schnitzer Steel
SHREDDED/GROUND PLASTIC	RECYCLABLE	PLASTIC REVOLUTIONS ENGINEERED RECYCLING
CARDBOARD/OFFICE PAPER	RECYCLABLE	CARAUSTAR- Dalton
PLANT TRASH	NON HAZ	WASTE MANAGEMENT



**AQUA TREAT  
INCORPORATED**617 Hudson Road  
Chattanooga, TN 37405  
(423) 265-0132

NAME OF WASTE STREAM

Latex/Ink/Polymer and Resin Waste

MATERIAL PROFILE NO.

1073D

☐ New ☒ Amendment ☒ LOG ☐ SQG ☐ CSQG

Expiration: \_\_\_\_\_

**A. GENERATOR INFORMATION**Generator Name IMACC Corp.  
Facility Address 2303 Dalton Industrial CourtTechnical Contact **BRANDON CUTT**  
Telephone **706 463-0726**  
Fax **706 259-8071**  
Billing Name SAME  
Billing Address

City/County Dalton

State GA

Zip Code 30721

City

State

Zip Code

USEPA ID#

Attention

State ID#

Telephone

Ext.

**B. DOT Shipping Name** Non-Hazardous, Non-Regulated Material

Tech. Con.

Hazard Class

Zone

Label Req.

UN/NA No.

Packaging Group

RQ No

**D. ANNUAL REPORT CODES**SIC Code: ~~2699~~ **7699**

Source Code:

Form Code:

Origin Code:

System Type:

**E. OTHER COMPONENTS**

	No	Yes	Total ppm
PCB's	<input type="checkbox"/>	<input type="checkbox"/>	
Cyanides	<input type="checkbox"/>	<input type="checkbox"/>	
Sulfides	<input type="checkbox"/>	<input type="checkbox"/>	
Pesticides	<input type="checkbox"/>	<input type="checkbox"/>	
Phenolics	<input type="checkbox"/>	<input type="checkbox"/>	
Dioxins	<input type="checkbox"/>	<input type="checkbox"/>	
Halogens	<input type="checkbox"/>	<input type="checkbox"/>	

**C. RCRA RCRA** Non Hazardous/Exempt? Yes

Process Generating:

Container Reconditioning

State Waste Codes:

EPA Waste Codes

**F. PHYSICAL CHARACTERISTICS AT 70°F**

1. Infectious or Biological Waste?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. NRC Regulated Radioactive?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3. Reactivity	<input checked="" type="checkbox"/> None <input type="checkbox"/> Water Reactive
	<input type="checkbox"/> Pyrophoric <input type="checkbox"/> Shock Reactive
	<input type="checkbox"/> Cyanides <input type="checkbox"/> DOT Explosive
	<input type="checkbox"/> Sulfides <input type="checkbox"/> Other

Gas (Cylinder)	<input checked="" type="checkbox"/> Solid	20	%
Aerosol	<input checked="" type="checkbox"/> Sludges	70	%
Lab-Pack	<input checked="" type="checkbox"/> Free Liquids	10	%
		100%	

Layers  
☐ Single Layered ☐ Bi-layered ☒ Multi-layeredViscosity  
☐ Low ☐ Medium ☒ HighOdor  
☐ None ☒ Mild ☐ Strong Describe:

Color/Appearance: Characteristic

Weight Density	10	lbs./gal.(US, Liq.)	lbs./cu.foot
		<1.0%	5-20%
Dry Weight		1-5%	20-100%
pH	N/A		
	0-2	<input checked="" type="checkbox"/> 4, 1-10	<input type="checkbox"/> ≥12.5
	2, 1-4	10, 1-12.4	Exact

Flash Point (liquid only)		Boiling Point
<73°F (23°C)		<95°F (35°C)
73-140°F (23-60°C)		>95°F (35°C)
142-200°F (61-93°C)		
<input checked="" type="checkbox"/> >200°F (93°C)		Exact
Exact		

BTU/Lb.

**H. PHYSICAL/CHEMICAL CONSTITUENTS**

Polymers	20	%
Resins	20	%
Inks	10	%
Latex	30	%
Solids	20	%
		100%

(Attach All MSDS, Sample Analysis and Additional Info.)

Dermal Toxicity LD<sub>50</sub> (mg/kg)

≤40	>200, ≤1000
>40, ≤200	>1000

4. Materials poisonous by inhalation? ☐ Yes ☒ NoOral Toxicity LD<sub>50</sub> (mg/kg)

≤5	>5, ≤50
Solids: >50, ≤200	>200
Liquids: >50, ≤500	>500

5. Is this waste stored in vented drums? ☐ Yes ☒ No6. Is this waste pumpable? ☒ Yes ☐ No7. Is this waste polymerizable? ☐ Yes ☒ No8. Is waste stream subject to the National Emission Standards for Benzene Waste Operations (40 CFR 61 Subpart FF)? ☐ Yes ☒ No9. Is this waste regulated as an ozone depleting substance (40 CFR Part 82)? ☐ Yes ☒ No10. Does this waste contain scrap metal pieces greater than 2 inches in size? ☐ Yes ☒ No**I. ANTICIPATED VOLUME**

Qty. Container	Qty. Container
5 qt. pail	Cubic Yard Box*
15 gl. carboy	Super Sack*
30 gl. drum	Rolloff/Dump Trailer*
30 <input checked="" type="checkbox"/> 55 gl. drum	Tanker*
85 gl. drum	16 <input checked="" type="checkbox"/> Other

Per ☐ 1 Time ☒ Week ☐ Month  
☐ Year ☐ Other

(\*) Is waste regulated as a Marine Pollutant (49 CFR 171.8)? ☐ Yes ☒ No**G. METALS**

	Reg. Limit	Below	Above	Range
Arsonic	5 mg/L	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Barium	100 mg/L	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Cadmium	1 mg/L	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Chromium	5 mg/L	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Copper		<input type="checkbox"/>	<input type="checkbox"/>	
Lead	5 mg/L	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Mercury	0.2 mg/L	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Nickel	134 mg/L	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Selenium	1 mg/L	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Silver	5 mg/L	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Zinc		<input type="checkbox"/>	<input type="checkbox"/>	
Other:				

Generator's Certification:

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine that no deliberate or willful omissions of composition properties exist and that all known or suspected hazards have been disclosed. I certify that the materials tested are representative of all material described by this profile.

Generator's Authorized Signature: \_\_\_\_\_

Date 11-16-16

## **8 TRAINING, SAFETY, INSPECTION, AND CONTINGENCY PLAN**

### **8.1 EMPLOYEE TRAINING**

All employees are given training for site safety and general operations. Employees whose job responsibilities include handling of non-hazardous waste or hazardous materials receive Emergency Action Plan and Hazard Communications training. Additional training is provided under HM126F, function specific training..

### **8.2 SAFETY**

Employee health and safety is a primary concern for IMACC Corporation. Safe work practices and prevention to exposures of hazardous materials include:

- ◆ Regular safety meetings that address the potential hazards associated with specific plant operations and general safety issues such as accident prevention.
- ◆ Providing appropriate safety equipment to employees, such as safety glasses, hearing protection, aprons and gloves.

### **8.3 INSPECTIONS**

Inspections are performed daily, weekly, and/or monthly. All inspections are recorded on appropriate checklists. Items requiring corrective action are recorded on the inspection forms along with the corrective action taken.

Additional inspections and audits are conducted by the IMACC Corporation Environmental Department and by customers sending Containers to IMACC. Results of such inspections are reported to the plant manager for corrective action.

### **8.4 CONTINGENCY PLAN**

The plan required under 40 CFR 265.50 - 265.56 is not required at this time due to the facility's status as Conditionally Exempt or Small Quantity Generator.

## **9.0 INSURANCE**

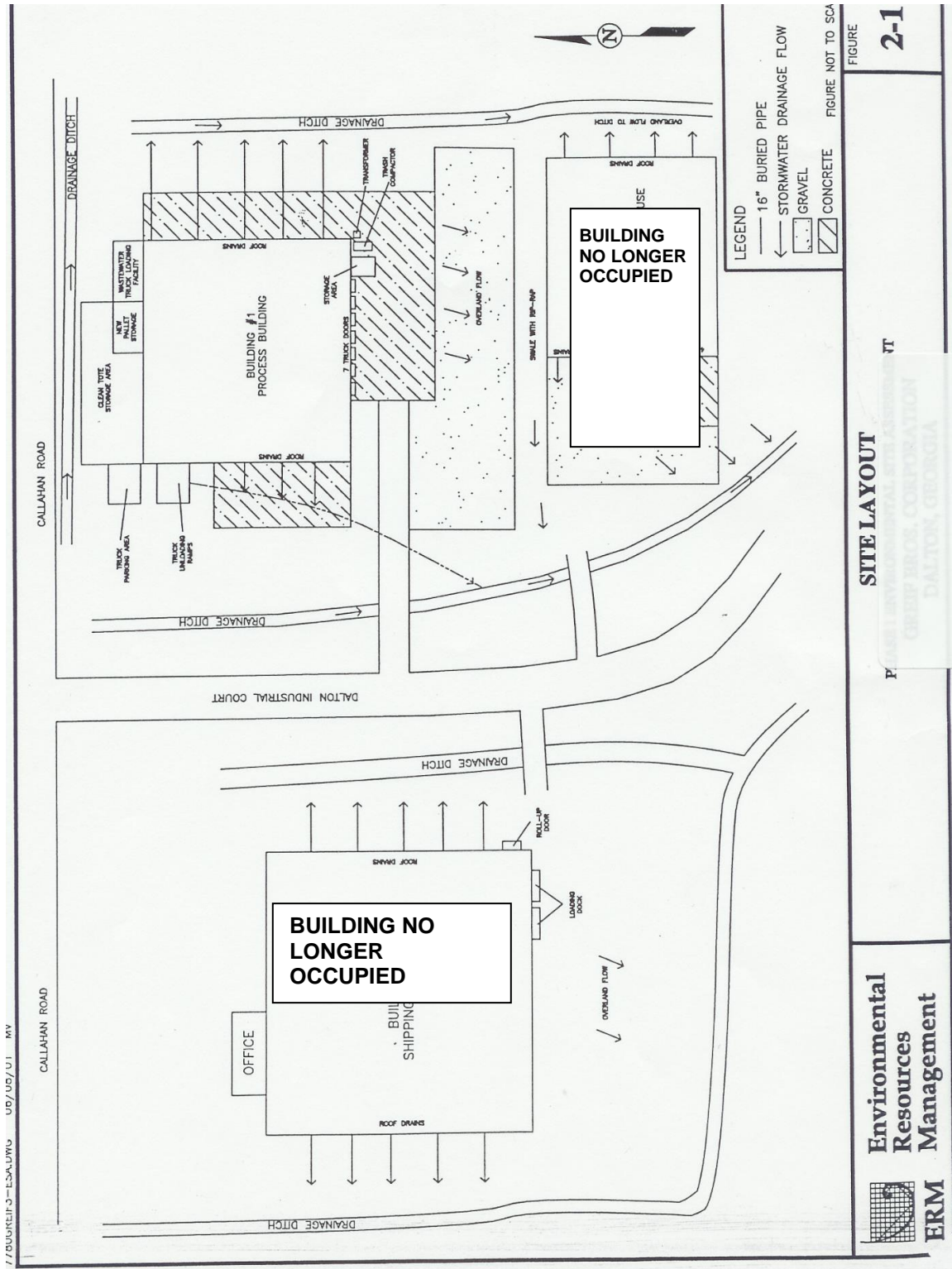
IMACC Corporation maintains general liability, automobile, and workers compensation insurance. A copy of the insurance certificate is included.

## EXHIBIT 1: FACILITY LOCATION MAP

**2303 Dalton Industrial Court  
DALTON, GA 30721**

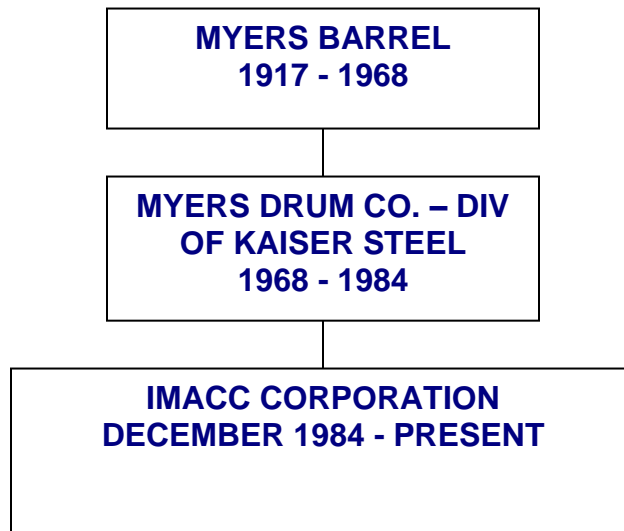


## EXHIBIT 2: FACILITY SITE MAP



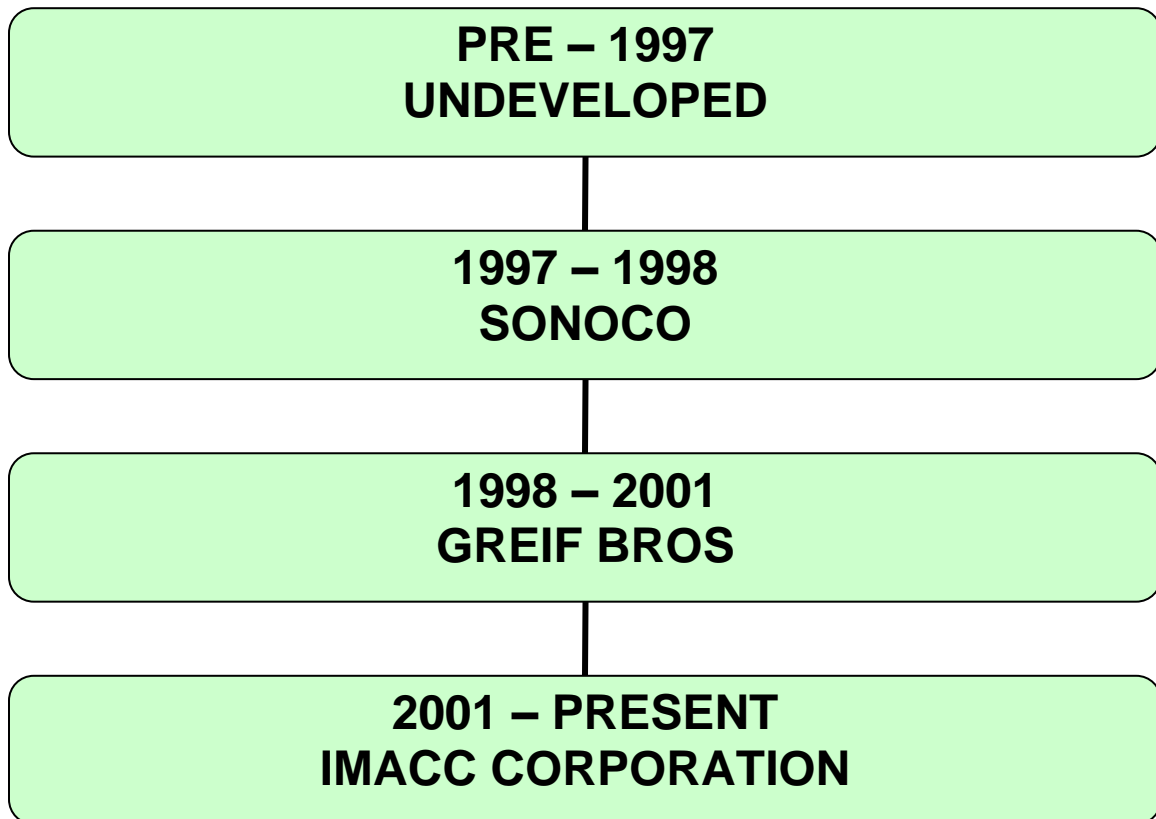
**EXHIBIT 3 -- CORPORATE HISTORY**

**IMACC CORPORATE HISTORY**



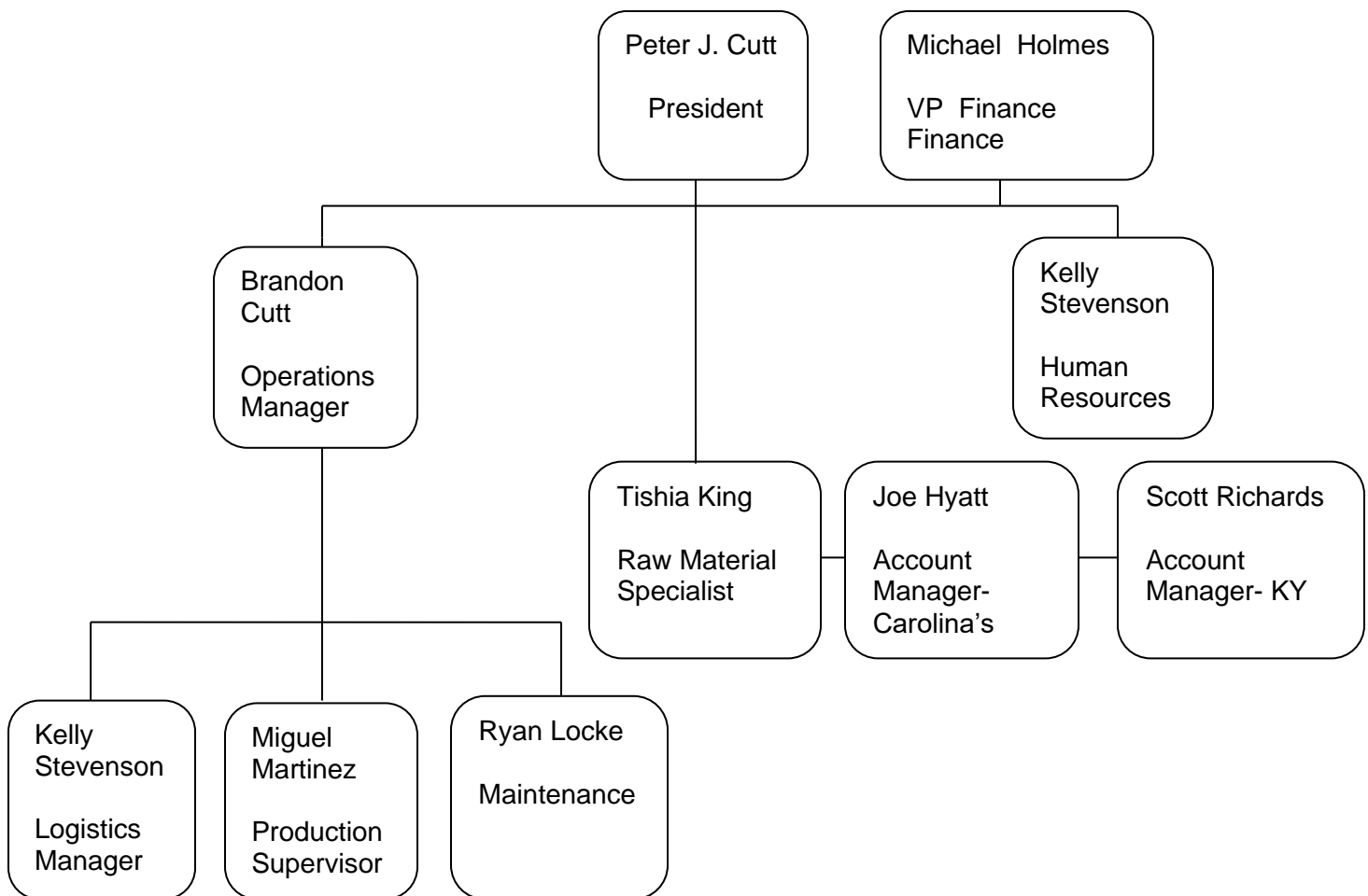
**EXHIBIT 4 -- SITE HISTORY**

**IMACC CORPORATION  
SITE HISTORY - DALTON**



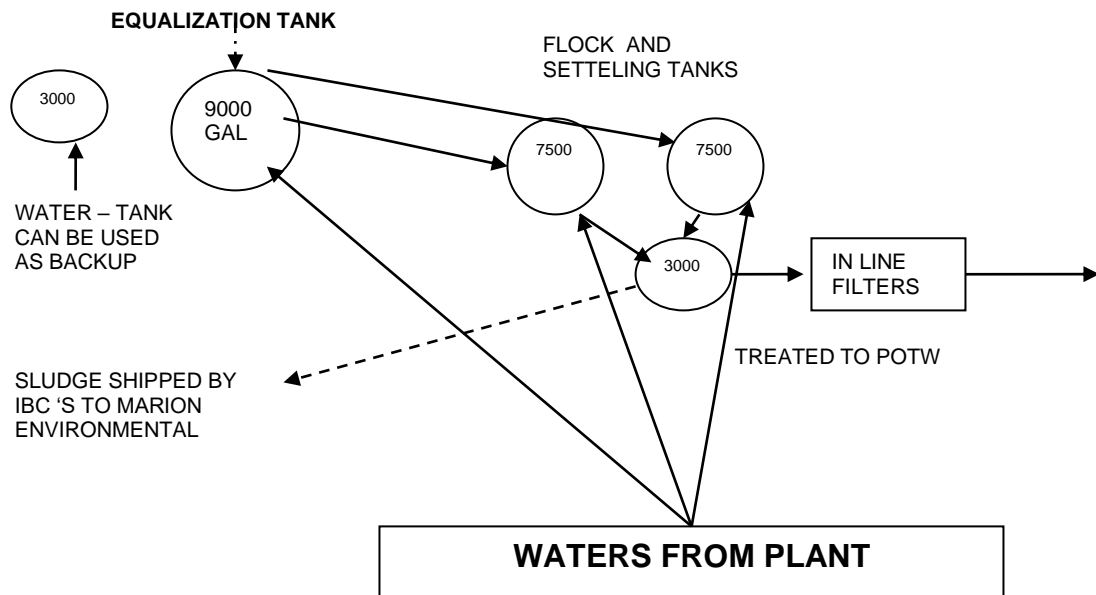
## EXHIBIT 5 - DALTON ORGANIZATION CHART

### MACC CORPORATION DALTON ORGANIZATION CHART



## EXHIBIT 6 -- WASTEWATER PROCESS FLOW

### IMACC CORPORATION WASTEWATER PROCESS FLOW



## EXHIBIT 7 – IMACC CORPORATION ACCEPTANCE POLICY

The acceptance of bulk containers such as IBCs (totes) and plastic (poly) and steel containers is based on the degree of empty and the type of residue



remaining in the package. Presently, the same standards for acceptance of 55 gallon containers apply to IBC's.

IBCs and drums last containing a **Hazardous** material must be "drip dry," and material/residue free. Tip or tilt the IBC as necessary. If we can open the valve and product comes out, we do not consider the container to be empty. Containers must be properly labeled and in proper condition for transportation according to applicable regulations of the US Department of Transportation. This will protect you. DOT's 49 CFR 173.29 states that all openings of the empty containers must be closed, and that all markings and labels must be in place as if the container was full of its original contents. Placards will be required per DOT rules.

Any containers received with excess hazardous residues (DOT placarding) will be rejected and returned to the shipper at the shipper's expense.

For residues or products specifically specified in 40 CFR 261.31, 261.32, 261.33(e), the container is empty only if the container has been triple rinsed using a solvent capable of removing the last contained material.

IBCs or drums last containing a **Non Hazardous** material should be empty with all closures and original labels in place. IMACC will accept up to 1" of Non Hazardous material at no charge. Any containers received with excess Non Hazardous residue above one inch will be charged a \$4/per gallon disposal fee or the containers may be returned to the shipper at the shipper's expense.

### **Federal DOT Empty Packaging Requirements**

#### 49 CFR 173.29(a)

General Except as otherwise provided in this section, an empty packaging containing only the residue of a hazardous material shall be offered for transportation and transported in the same manner as when it previously contained a greater quantity of that hazardous material.

#### 49 CFR 172.203(e)

Empty Packagings. (1) The description on the shipping paper for a packaging containing the residue of a hazardous material may include the words "RESIDUE: Last Contained \_\_\_\_\_" in association with the basic description of the hazardous material last contained in the packaging.

### **Responsible Transportation Policy**

DOT's 49 CFR 173.29 states an empty packaging containing only residue of a hazardous material shall be offered for transportation in the same manner as when it previously contained a greater quantity of that hazardous material (i.e., all openings must be closed, and all markings and labels must be in place). Additionally:

**For Non-Bulk Containers (maximum capacity of 119 gallons):** a DOT shipping paper is not required for transportation of any empty drum for reconditioning via contract or private carrier. DOT placarding is not required for vehicles carrying empty containers.

**For Bulk Containers - previously containing hazardous materials - (capacity exceeding 119 gallons):** a DOT shipping paper is required for transportation of any IBC for reconditioning via contract or private carrier. DOT placarding is required for vehicles carrying empty bulk containers.

#### Reusable Industrial Packaging Association RIPA - IBC Determination (January 1999)

Currently, DOT classifies intermediate bulk containers as "bulk" packaging. All bulk packaging, even those which contain only residues of hazardous materials, must be transported as if full. This means that transporters of empty IBC's are required to placard their vehicles and to carry shipping papers in compliance with DOT regulations. In addition, transporters must carry special emergency response information in their vehicles, including a 24 hour emergency contact.

### **Long Term Liabilities**

Emptiers must understand portions of the Superfund Recycling Equity Act of 1999.

The emptier should make an effort to understand scrap recycling protection or lack of protection found in the superfund law. If a shipping container is fully decontaminated and then rendered into scrap through recycling, protections are available under certain conditions explicitly outlined in the law. Shipping containers with any residue hazardous substances in or on them remain subject to the liability provisions of the Superfund law.

The full text of the "Superfund Recycling Equity Act of 1999" (the language of S. 1528) is found in the November 19, 1999, Congressional Record - Senate on pages S15048 through S15052. You may view this on GPO Access ([www.access.gpo.gov](http://www.access.gpo.gov)). It is also incorporated into CERCLA Section 127. But as an emptier your responsibility is to ensure that containers are handled in an environmentally sound manner.

### **Residue Acceptance Criteria**

#### **Never Accept List**

The following is a list of residues IMACC Corporation never accepts:

- Biological (where the MSDS specifies the container is not to be reused; triple rinsing or equivalent cleaning methods may be allowed if specified on the MSDS).
- Cyanide or Cyanide Compounds
- Dioxin
- Parathine (any percentage)
- PCB's (Polychlorinated Biphenyls)
- Radioactive

Depending on an evaluation by the IMACC Corporation Environmental personnel, exceptions can be made to the never accept list on a case by case and chemical specific basis . Consideration for acceptance can be made based on the following:

- The percentage of the chemical in the residue is low and over-conservative labeling by the manufacturer is evident.
- How much of the residue is physically present (e.g., methanol may be fully evaporated and not present in the container), or

If the chemical residue actually decontaminates the container by its cleaning properties.

### **IMACC Corporation Policy Non-Accept List Without Triple Rinsing or Written Consent**

The non-accept list is based on Federal Regulations for Acute Hazardous Waste and a historical list of chemicals developed at our reconditioning facilities. The regulated lists of materials are described in the following sections:

#### **49 CFR 261.7 (b) (3), which states:**

A container or an inner liner removed from a container that has held an acute hazardous waste listed in Secs. 261.31, 261.32, or 261.33(e) is empty if:

- (i) The container or inner liner has been triple rinsed using a solvent capable of removing the commercial chemical product or manufacturing chemical intermediate;

- (ii) The container or inner liner has been cleaned by another method that has been shown in the scientific literature, or by tests conducted by the generator, to achieve equivalent removal; or
  - (iii) In the case of a container, the inner liner that prevented contact of the commercial chemical product or manufacturing chemical intermediate with the container has been removed.
- 

Federal Regulations  
Acute hazardous waste

40 CFR 261.31

Hazardous Waste from non-specific sources  
Hazard Code H - F020, F021, F022, F023, F026 and F027

40 CFR 261.32

Hazardous Waste from specific sources  
Hazard Code H - Non Presently Listed

40 CFR 261.33(e)

Discarded Commercial Chemical Products,  
Off-specification Species, Container Residues,  
And Spill Residues Thereof.  
Section "(e)" - P-List SEE [EXHIBIT 7A](#)

Code of Federal Regulations (CFR's) available at:  
<http://www.gpo.gov/nara/cfr/cfr-table-search.html#page1>

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**IMACC Corporation Non Accept List  
Without Triple Rinsing or Written Consent of IMACC Corporation**

In addition to the Federal Acute Waste Lists, the following chemical residues are listed by IMACC Corporation policy as non accept without triple rinsing or IMACC personell consent:

111-Trichloroethane  
Acrylonitrile  
Alkyl Chloride  
Ammonia Perchlorate  
Ammonium Fluoride  
Aqua Ammonia (any percentage)  
Benzene  
Benzoyl Chloride  
Butylacrylate  
Carbon Tetrachloride  
Chlorinated Phenols  
Chloroform  
Chloroprene  
Ethyl Chloride  
Ethylene Dichloride  
Formaldehyde (any percentage)  
Hexachlorobenzene  
Hydrofluoric Acid (any percentage)  
Hydrogen Chloride  
Inerteen 70 - Monsanto Lined Drums  
Methyl Chloroform  
Methylene Chloride (any percentage)  
Penta (Pentachlorophenol)  
Perchloric Acid  
Perchloroethylene (Perc)  
Perfluorooctane Sulfonate (PFOS)  
Perfluorooctanoic Acid (PFOA)  
P-Listed Wastes (Triple Rinsed Requirement)  
Potable Coagulant  
Silicon  
Sodium Bisulfide  
Toluene Diisocyanate (TDI)  
Trichloroethylene  
Triethylamine  
Vinyl chloride  
Vinylidene Chloride

### **General Policy on Residue Review**

Except for known acceptable classifications of hazardous materials (acids, caustics, most non-chlorinated solvents, paint, etc.) and unused oil residues, all new emptiers of containers (IBC's/Drums) are requested to submit MSDS's to the Environmental Department for acceptance.

IMACC Corporation Raw Material Specialist  
(706) 483-7047 Tishia King  
[tking@imacc-corp.com](mailto:tking@imacc-corp.com)  
Fax (706) 259-8071

#### **EXHIBIT 8 -- IMACC CORPORATION EXCESS HEEL MEASUREMENT POLICY**

It is IMACC Corporation policy to document all containers received with excess Non Hazardous residues exceeding 1 inch. IMACC's measurement policy is stated below. IMACC Corporation may charge for any excess non haz heel over 1 in (7 gal). Pictures will be taken of each container with excess heel and

recorded along with emptier information. These pictures will then be made available to the emptier at the emptier's request. Some contractual obligations could override this policy.



Measurements are taken on the outside of the bottle at the valve area. We chose not to measure from the filling hole (center) because that would require opening every unit with excess heel. This will require a tool, a dipstick, cleaning supplies and a collection container for contaminated rags. Measurements from the filling hole vs. the bottle exterior do not match.

\* Heel between 14 gal and lowest marking will be our best and fairest estimate

#### IMACC Corporation Heel Measurement Table



1"	7 gal.
1 1/2"	11 gal
2"	14 gal

IMACC Corporation may charge per gallon for any Non- haz heel over 1" (7 gal.). Some contractual obligations could override this policy

### IMACC Corporation

**IBC Collection:** Thank you for contacting IMACC Corporation. In order to process your return request, please fax or email this information to us. We will assign a unique return number for each transaction.

Company \_\_\_\_\_ Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_  
Contact \_\_\_\_\_ Zip / Postal Code \_\_\_\_\_  
Pickup Hrs \_\_\_\_\_ Phone \_\_\_\_\_

Email \_\_\_\_\_ Fax \_\_\_\_\_

### IMPORTANT FEATURES OF THIS COLLECTION PROGRAM:

1. Our collection program is intended to provide customers with a return service for Intermediate bulk containers after a single use.
2. Free collections are only authorized for return of reusable cage-style composite IBC's. IBCs must be intact and free of punctures, cracks, excessive rust and not have broken pallets, bolts, etc. The IBC must maintain its original functionality.
3. I hereby certify, by signing below, that these containers are empty as that term is defined in the Environmental Protection Agency Regulations, 40 CFR 261.7\*, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49 CFR 173.29\*\*.\* With regard to most regulated residues, EPA's 40 CFR 261.7 states, (see regulation for exact language) a container is empty if:  
(a) all wastes have been removed that can be removed using practices commonly employed to remove materials from that type of container, e.g. pouring, pumping, aspirating, and (b) no more than 2.5 centimeters (one inch) of nonremovable residue in the bottom of the container or no more than 3% by weight of total capacity remains in the container.  
For residue of products specifically specified in 40 CFR 261.31, 261.32, 261.33(e) the container is empty only if the container has been triple rinsed using a solvent capable of removing, or has been cleaned by another method shown capable of equivalent removal.
4. Containers must be properly emptied, classified, described, packaged, marked, labeled and in proper condition for transportation according to applicable regulations of the United States Department of Transportation. This will protect YOU. HAZMAT requires placards be provided by the shipper to the driver per DOT rules. \*\*DOT's 49 CFR 173.29 states that all openings on the empty container must be closed, and that all markings and labels must be in place as if the container were full of its original contents.
5. Any containers received with excess hazardous residues (DOT placarding) will be rejected and returned to the shipper at the shipper's expense.
6. IBCs or drums last containing a Non Hazardous material should be empty with all closures and original labels in place. IMACC Corporation will accept up to 1" of Non Hazardous material at no charge. Any containers received with excess Non Hazardous residue above one inch will be charged a \$4/per gallon disposal fee or the containers will be returned to the shipper at the shipper's expense

**All information must be completed before arrangement can be made. Minimum quantity for pickup is 8 IBCs**

Quantity IBCs	HAZMAT Y      N	Chemical Trade Name / DOT Shipping Info / UN# for HAZMAT

Shipper/Emptier agrees that by signing this agreement these conditions apply to the first shipment of empty containers as well as all subsequent shipments to IMACC Corporation.

The containers returned comply with the above detailed rules of the collection program:

Signature \_\_\_\_\_ Date \_\_\_\_\_

Should you have any questions, you may call 706-270-8635 to speak to a customer service representative. You may also email your request to [tking@imacc-corp.com](mailto:tking@imacc-corp.com)

**Please fax back to  
706-259-8071**



## EXHIBIT 10 – CERTIFICATE OF DESTRUCTION

IMACC also offers complete destruction capability, so if your company or your vendors require that the container be destroyed instead of reconditioned we will be happy to provide you with a certificate of destruction.



Certificate of Destruction:

Date Received	
Emptier	
BOL #	
Count Received	
Date Destroyed	

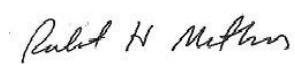
The containers received have been properly destroyed and all wastes have been disposed of in accordance with all Federal, State and Local regulations.

IMACC Corp. – Dalton, GA. – EPA ID# GAR000014878

\_\_\_\_\_  
Name & Title

Date\_\_\_\_\_

# EXHIBIT 11- CERTIFICATE OF INSURANCE

CERTIFICATE OF LIABILITY INSURANCE										DATE (MM/DD/YYYY) 01/22/2020															
<p>THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.</p>																									
<p><b>IMPORTANT:</b> If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).</p>																									
<b>PRODUCER</b> STARR-MATHEWS AGENCY 108 North Court St. P. O. Box 188 Calhoun GA 30703-0188						CONTACT Amy Miller NAME: PHONE (706) 629-4441 (A/C, No, Ext): E-MAIL amiller@starrmathews.com ADDRESS: <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">INSURER(S) AFFORDING COVERAGE</th> <th style="text-align: center;">NAIC #</th> </tr> </thead> <tbody> <tr> <td>INSURER A : Aspen Specialty Insurance</td> <td></td> </tr> <tr> <td>INSURER B : Ohio Security Insurance Co</td> <td>24082</td> </tr> <tr> <td>INSURER c : Accident Fund Ins Co of America</td> <td>10166</td> </tr> <tr> <td>INSURER D :</td> <td></td> </tr> <tr> <td>INSURER E :</td> <td></td> </tr> <tr> <td>INSURER F :</td> <td></td> </tr> </tbody> </table>						INSURER(S) AFFORDING COVERAGE	NAIC #	INSURER A : Aspen Specialty Insurance		INSURER B : Ohio Security Insurance Co	24082	INSURER c : Accident Fund Ins Co of America	10166	INSURER D :		INSURER E :		INSURER F :	
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<b>INSURED</b> IMACC Corporation 3527 Mt Diablo Blvd Suite 410 Lafayette CA 94549																									
COVERAGES		CERTIFICATE NUMBER:				2019-20/2020-21 WC				REVISION NUMBER:															
<p>THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.</p>																									
INSR LTR	TYPE OF INSURANCE		ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS																	
A	<input checked="" type="checkbox"/>	COMMERCIAL GENERAL LIABILITY			ERAF1NG19	12/31/2019	12/31/2020	EACH OCCURRENCE	\$ 1,000,000																
	<input type="checkbox"/>	CLAIMS-MADE	<input checked="" type="checkbox"/>	OCCUR				DAMAGE TO RENTED PREMISES (Ea occurrence)	0 \$ 300,00																
								MED EXP (Any one person)	0 \$ 25,00																
	GEN'L AGGREGATE LIMIT APPLIES PER:							PERSONAL & ADV INJURY	\$ 1,000,000																
	<input checked="" type="checkbox"/>	POLICY	<input type="checkbox"/>	PRO-JECT	<input type="checkbox"/>	LOC																			
	OTHER:																								
B	<input checked="" type="checkbox"/>	AUTOMOBILE LIABILITY			BAS56368780	12/31/2019	12/31/2020	COMBINED SINGLE LIMITEach Loss Limit (Ea accident)	\$ 1,000,000																
	<input checked="" type="checkbox"/>	ANY AUTO						BODILY INJURY (Per person)	\$																
	<input type="checkbox"/>	OWNED AUTOS ONLY	<input type="checkbox"/>	SCHEDULED AUTOS				BODILY INJURY (Per accident)	\$																
	<input type="checkbox"/>	HIRED AUTOS ONLY	<input type="checkbox"/>	NON-OWNED AUTOS ONLY				PROPERTY DAMAGE (Per accident)	\$																
A	<input checked="" type="checkbox"/>	UMBRELLA LIAB			EXAF1NH19	12/31/2019	12/31/2020	property damage	\$ 10,000,000																
	<input type="checkbox"/>	EXCESS LIAB	<input checked="" type="checkbox"/>	OCCUR				EACH OCCURRENCE	\$																
	<input type="checkbox"/>		<input type="checkbox"/>	CLAIMS-MADE				AGGREGATE	\$																
	<input type="checkbox"/>	DED	<input type="checkbox"/>	RETENTION \$					\$																
C	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY				WCV6096887	01/01/2020	01/01/2021	<input checked="" type="checkbox"/> PER STATUTE	<input type="checkbox"/> OTHER																
	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below		<input type="checkbox"/>	N				E.L. EACH ACCIDENT	\$ 1,000,000																
								E.L. DISEASE - EA EMPLOYEE	\$ 1,000,000																
								E.L. DISEASE - POLICY LIMIT	\$ 1,000,000																
DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)																									
CERTIFICATE HOLDER						CANCELLATION																			
IMACC Corporation 3527 Mt. Diablo Blvd. Suite 410 Lafayette CA 94549						SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.																			
						AUTHORIZED REPRESENTATIVE 																			

ACORD 25 (2016/03)

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EXHIBIT 12- CERTIFICATE OF MEMBERSHIP





June 18, 2018

Peter Cutt  
IMACC Corporation  
396 Callahan Rd. SW  
Dalton, GA 30721

**RE: Annual Inspection Report for IMACC Corporation**

Dear Mr. Cutt:

This correspondence is in reference to the recent annual pretreatment inspection performed by Dalton Utilities at IMACC on April 26, 2018. Please refer to the enclosed Industrial User Inspection Report for additional information regarding the aforementioned inspection.

The sampling data from the inspection is also enclosed with this correspondence. These results indicate that IMACC had no permit violations from this inspection sampling event. Please be advised that these results will be averaged with any other sampling data required by your permit and provided to Dalton Utilities for the month in which the inspection samples were collected. Averaged results for the month must be below the permit limits to ensure there is not a permit violation.

If you have any questions, please contact me at 706-529-1241 or at [bharrison@dutil.com](mailto:bharrison@dutil.com).

Sincerely,

A handwritten signature in cursive script that reads "Brian Harrison".

Brian Harrison  
Laboratory Services Manager

Enclosures (2)