



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

July 3, 2024

VIA EMAIL

Mr. Bryce German
Environmental Compliance Manager
Tradebe Transport a/k/a Marport
4343 Kennedy Avenue
East Chicago, Indiana 46312

Re: Violation Letter
Tradebe Transport a/k/a Marport
INR000123497
East Chicago, Lake County

Dear Mr. German:

On 6/5/2024, a representative of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of Tradebe Transport a/k/a Marport, located at 4323 Kennedy Avenue, East Chicago, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection: Compliance Evaluation Inspection

Results of Inspection: Violations were discovered and require a submittal.

Within thirty (30) days of receipt of this letter, a written detailed explanation, documenting compliance with each of the requirements listed in the inspection report, must be submitted to this office. Failure to respond adequately to this Violation Letter may result in a referral to the OLQ Enforcement Section. Please direct any response to this letter and any questions to Theresa Pichtel at (317) 409-4501 or tpichtel@idem.in.gov. Thank you for your attention to this matter.

Sincerely,

Susan Lowry
Section Chief
Hazardous Waste Compliance Section
Compliance Branch



A State that Works

Enclosure

cc: Lake County Health Department
Paula Bansch, IDEM



**HAZARDOUS WASTE
INSPECTION REPORT**
INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT

Inspector's Name:	Theresa Pichtel	
Others Present	Chuck Breitenfeldt	NWRO Deputy Director
	Kari Clevenger	Senior Environmental Manager
Date:	Wednesday, June 05, 2024	
Time In:	9:00 AM	
Time Out:	2:45 PM	
Inspection Type	Compliance Evaluation Inspection	

General Information

Facility Information					
Facility Name	Tradebe Transport a/k/a Marport				
Facility Location	4323 Kennedy Avenue East Chicago, Indiana 46312 Lake County				
Facility Mailing Information	4343 Kennedy Avenue East Chicago, Indiana 46312				
Facility Contact	Same as Primary Facility Contact				
Primary Facility Contact During Inspection	Bryce German Environmental Compliance Manager (219) 240-6191 bryce.german@tradebe.com				
Other Facility Contact(s) During Inspection	Salutation	First Name	Last Name	Title	Email
	Mr.	Michael	Poe	EHS Specialist	michael.poe@tradebe.com
	Mr.	Michael	Morgan	Regional Environmental Compliance Manager	michael.morgan@tradebe.com
	Mr.	Wade	Scheel	Vice President of EHS	wade.scheel@tradebe.com

Facility ID			
EPA ID Number	INR000123497	NAICS Code	562112

Facility Status			
File Status	Very Small Quantity Generator	Other Activities	Hazardous waste transporter; 10-day transfer facility

Outstanding Issues	
Last Inspection Date	2/14/2024
Previous Violations	<input checked="" type="radio"/> Yes <input type="radio"/> No

Details	Date	Description
	9/2022	AO, Case No. 2022-28875-H, TTR and Marport

Inspection Narrative

On June 5, 2024, a compliance inspection of Tradebe Transportation LLC a/k/a Marport was conducted. Mr. Bryce German, Environmental Compliance Manager, Mr. Michael Poe, EHS Specialist, and Mr. Michael Morgan, Regional Environmental Compliance Manager represented the facility during the inspection.

Tradebe Transportation, LLC operates a hazardous waste 10-day transfer facility, located at 4323 Kennedy Avenue, a/k/a Marport. The 10-day transfer facility is adjacent to the Tradebe Treatment and Recycling LLC (Tradebe), a permitted treatment, storage, and disposal facility (TSDF) located at 4343 Kennedy Avenue. Marport, LLC owns the 4323 Kennedy Avenue property, and Oriol Mateu is listed as CFO of Marport, LLC. The Marport LLC property is used by Tradebe Transportation LLC (Marport) and Tradebe to manage both inbound and outbound shipments of hazardous waste to and from the Tradebe Treatment and Recycling LLC TSDF.

Tradebe Treatment and Recycling LLC submitted a "Self-Disclosure and Request for Variance" on August 25, 2022 (VFC #83363428), which covered both the TSDF site and the Marport site. On September 27, 2022, an Agreed Order (VFC #83387457) was adopted which allowed Tradebe Transportation to store outbound shipments of hazardous waste, destined for incineration, for longer than ten (10) days at Marport. Specific conditions were established under this Agreed Order, and this inspection included a review of those conditions.

The inspection included the specific conditions established in the Agreed Order and of the overall 10-day transfer facility. Trailers that are subject to the conditions established in the Agreed Order are trailers containing hazardous waste destined for incineration. The incineration trailers may be stored in Areas 1 and/or 2 (see attached map); however, the trailers are now being stored only in Area 1. Tradebe staff do not anticipate storing the trailers in Area 2 any longer. The facility is required to keep an inventory of trailers containing incineration wastes; thirteen (13) trailers were in Area 1 at the time of the inspection. A copy of the inventory as of June 5, 2024 is attached. It was noted that the facility is now using heavier absorbent booms that allow the booms to more adequately stay in place. No violations were observed with respect to the trailers inspected in Area 1.

Trailers being held in the remaining area of the Marport property were also inspected. An inventory of those trailers is attached. Approximately 44 trailers were inspected. There were two manifested shipments in Trailer 53R13047, Manifest Document #021356910JJK and Manifest Document #021356908JJK (attached). Manifest Document #021356908 had not been signed by the transporter (Tradebe Transport). Additionally, in Box 5 of the manifests, the generators were listed as Curtis Packaging Corp and North American Warehouseing Co; however, Tradebe Treatment and Recycling was listed as the generator's site address. At the time of the inspection, Tradebe personnel were not sure why this discrepancy had occurred and were trying to ascertain the cause. Subsequent to the inspection, the issue was traced to a software error in Tradebe's manifesting system and was corrected.

Upon opening Trailer 53R15063, it was discovered that several 5-gallon pails of hazardous waste (D001, D002) were not secured in the trailer (see Photo 1). Mr. German stated that with the implementation of a new compliance notification system, communications between the generator and transporter would be improved and corrective actions would be documented and undertaken.

Regulatory Status			
Observed Activity	Very Small Quantity Generator	Other Activities	Hazardous waste transporter; 10-day transfer facility
Documents Reviewed	Manifests Trailer logs - incineration trailers and 10-day, AO, LDRs, End of Shift reports		
Comments			

Waste Management

Comments:

Waste Stream(s) Information

Waste Streams	
<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> Not Inspected <input type="radio"/> Not Applicable	
List waste stream(s) information that varies from the most recent Annual Report (Example: additional waste streams, waste streams no longer generated, significant increase/decrease in generation rate, etc.)	
Exempted/Excluded	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> Not Inspected <input type="radio"/> Not Applicable
Explanation	
Waste Management Areas	
Container Management Area(s)	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not inspected <input type="radio"/> Not applicable
Satellite Area(s)	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not inspected <input type="radio"/> Not applicable
Tanks, Restricted Waste Sites, and Other Regulated Units	
<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not inspected <input type="radio"/> Not applicable	

Environmental Releases	
Visible Releases/Contamination/Discharges	<input type="radio"/> Yes <input checked="" type="radio"/> No Release Observed

Compliance Assistance	
P2 Information	
The following P2 suggestions could possibly save money, reduce waste and/or minimize risk. You might consider having a P2 assessment, or a voluntary technical assistance consultation from IDEM staff. Please visit the agency's P2 web site at http://www.in.gov/idem/5298.htm for additional information.	
Contact by IDEM OPPTA Requested	<input type="radio"/> Yes <input checked="" type="radio"/> No
P2 Suggestions	

Guidance Materials	
Guidance Materials Provided to Facility	

Checklist (Checked box indicates a compliance concern)	
Standards <input type="checkbox"/> Hazardous Waste Determination <input type="checkbox"/> Recordkeeping (SQG and LQG) <input type="checkbox"/> Identifying Hazardous Waste Numbers (SQG and LQG) <input type="checkbox"/> Generator Category Determination <input type="checkbox"/> Notification (SQG, LQG, Transporter, TSDF) <input type="checkbox"/> Release to the Environment, Disposal of Solid Waste <input type="checkbox"/> Illegal Dumping <input type="checkbox"/> Other Violation	TSDF Permit Requirements <input type="checkbox"/> TSDF Permit Requirements <input type="checkbox"/> Other Violation

LQG Hazardous Waste Standards

- Accumulate for 90 Days or Less
- Container Condition
- Compatibility of Waste with Container
- Containers Closed
- Container Handling
- Central Accumulation Area Inspection
- Ignitable or Reactive Wastes - Distance from Property Line
- Ignitable or Reactive Wastes - Sources of Ignition/Reaction: "No Smoking" signs
- Conditions for Accumulation of Incompatible Wastes
- Container Labeled "Hazardous Waste"
- Container Marked with Indication of Hazards
- Containers Marked with Accumulation Start Date
- Tank Integrity Assessment
- Tank Containment and Detection of Releases
- Tank General Operating Requirements
- Tank Inspections
- Tank Subpart BB - Monthly Pump and Valve Monitoring
- Tank Subpart CC - Annual Inspection/Monitoring
- Tank Labeled "Hazardous Waste"
- Tank Marked with Indication of Hazards
- Tank Documentation for 90-Day Accumulation
- Maintenance and Operation of Facility
- Required Equipment
- Testing and Maintenance of Equipment
- Aisle Space
- Arrangements with Local Authorities
- Arrangements with Local Authorities - Documentation
- Contingency Plan Developed
- Content of Contingency Plan
- Copies of Contingency Plan
- Contingency Plan Quick Reference Guide
- Emergency Coordinator
- Personnel Training Program
- Personnel Training - Complete Within Six Months
- Personnel Training Annual Review

SQG Hazardous Waste Standards

- Accumulate for 180 Days or Less
- Accumulation Limit
- Container Condition
- Compatibility of Waste with Container
- Containers Closed
- Container Handling
- Central Accumulation Area Inspections
- Conditions for Accumulation of Incompatible Wastes
- Container Labeled "Hazardous Waste"
- Container Marked with Indication of Hazards
- Container Marked with Accumulation Start Date
- Tank Operating Conditions
- Tank Inspections
- Tank Labeled "Hazardous Waste"
- Tank Marked with Indication of Hazardous
- Tank Documentation for 180-Day Accumulation
- Land Disposal Restrictions
- Maintenance and Operation of Facility
- Required Equipment
- Testing and Maintenance of Equipment
- Access to Communications or Alarm System
- Aisle Space
- Arrangements with Local Authorities
- Arrangements with Local Authorities - Documentation
- Emergency Coordinator
- Emergency Information Posted
- Employee Training
- Other Small Quantity Generator Standards

VSQG Standards

- Hazardous Waste Generation Limit
- Hazardous Waste Accumulation Limit
- Hazardous Waste Determination
- Proper Disposal
- Prohibited Disposal of Liquids in Landfills

<input type="checkbox"/> Personnel Training Documentation <input type="checkbox"/> Personnel Training Record Retention <input type="checkbox"/> Notification for Closure <input type="checkbox"/> Land Disposal Restrictions <input type="checkbox"/> Large Quantity Generator - Other Violations	
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Satellite Accumulation – SQG and LQG <input type="checkbox"/> Quantity Limits, Point of Generation, Under Control of Operator <input type="checkbox"/> Container Condition <input type="checkbox"/> Compatibility with Container <input type="checkbox"/> Incompatible Wastes <input type="checkbox"/> Containers Closed <input type="checkbox"/> Container Labeled "Hazardous Waste" <input type="checkbox"/> Container Marked with Indication of Hazards <input type="checkbox"/> Preparedness and Prevention <input type="checkbox"/> Excess Generation	Manifest and Recordkeeping - Transporters <input checked="" type="checkbox"/> Manifest General Requirements <input type="checkbox"/> Use of the Manifest
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Episodic Generation <input type="checkbox"/> Notification <input type="checkbox"/> EPA ID Number <input type="checkbox"/> Accumulate for 60 Days or Less <input type="checkbox"/> Accumulation Prohibitions <input type="checkbox"/> Container Labeling <input type="checkbox"/> Tank Labeling and Recordkeeping <input type="checkbox"/> Recordkeeping <input type="checkbox"/> Preparedness and Prevention <input type="checkbox"/> Other Violation	Hazardous Secondary Materials <input type="checkbox"/> Reclaimed Under Control of the Generator <input type="checkbox"/> Contained <input type="checkbox"/> Speculative Accumulation <input type="checkbox"/> Notice <input type="checkbox"/> Documentation of Legitimacy Determination <input type="checkbox"/> Emergency Preparedness and Response <input type="checkbox"/> Emergency Procedures (Accumulates 6,000 kg or Less) <input type="checkbox"/> Emergency Procedures (Accumulates Greater than 6,000 kg) <input type="checkbox"/> Other Violation
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Solvent-Contaminated Wipes – Disposal <input type="checkbox"/> Container Management (Non-leaking containers) <input type="checkbox"/> Closed Containers <input type="checkbox"/> Labeling <input type="checkbox"/> Accumulation Time <input type="checkbox"/> No Free Liquids <input type="checkbox"/> Free Liquids Management <input type="checkbox"/> Documentation <input type="checkbox"/> Final Disposition	Solvent-Contaminated Wipes - Laundered or Dry Cleaned <input type="checkbox"/> Container Management (Non-leaking containers) <input type="checkbox"/> Closed Containers <input type="checkbox"/> Labeling <input type="checkbox"/> Accumulation Time <input type="checkbox"/> No Free Liquids <input type="checkbox"/> Free Liquids Management <input type="checkbox"/> Documentation <input type="checkbox"/> Clean Water Act
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Universal Waste – All Facilities <input type="checkbox"/> Universal Waste Labeling <input type="checkbox"/> Containers - Closed, Good Condition, No Evidence of Leaks <input type="checkbox"/> Universal Waste - Bulb Crushing Prohibition	Used Oil – All Facilities <input type="checkbox"/> Rebuttable Presumption Applies <input type="checkbox"/> Containers and Tanks in Good Condition <input type="checkbox"/> Containers/Tank Labeling <input type="checkbox"/> Release Clean Up and Containment <input type="checkbox"/> Burning Restrictions - Generated On-site or DIY, .5M BTU
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Description of Violation(s)

MANIFEST SYSTEM AND RECORDKEEPING - TRANSPORTERS

MANIFEST SYSTEM AND RECORDKEEPING

CITATION:
 40 CFR 263.20(b): Before transporting the hazardous waste, the transporter must sign and date the manifest acknowledging acceptance of the hazardous waste from the generator. The transporter must return a signed copy to the generator before leaving the generator's property.

DETAILS:
 Trailer 53R13047 contained hazardous waste included on Manifest Nos. 021356910JJK and 021356908JJK (attached). Tradebe Transport did not sign Manifest #021356908JJK before transporting as required.

REQUIRED ACTION:
 Ensure all manifests are signed by the transporter before transporting. Make manifest corrections with the EPA and, within 30-days of receipt of the inspection report, submit documentation of the correction to Theresa Pichtel, IDEM.

Inspection Documentation

Photographs	<input checked="" type="radio"/> Yes	<input type="radio"/> No
Map	<input checked="" type="radio"/> Maps	
GPS Location Collected	<input type="radio"/> Yes	<input checked="" type="radio"/> No
Analytical Screening Conducted	<input type="radio"/> Yes	<input checked="" type="radio"/> No
Lab Sample	<input type="radio"/> Yes	<input checked="" type="radio"/> No

Inspection Results/Actions

Comments:

Inspection Results

Violations were discovered and require a submittal.

Multi-Media Concerns

No concerns noted

Finalize Inspection

Written Summary of Inspection	Notice of Inspection and Verbal Summary Provided
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Inspector Information	Printed/Typed Name	Theresa Pichtel
	Phone Number:	(317) 409-4501
	Email Address:	tpichtel@idem.in.gov
	Signature:	Obtained on the Inspection Verification/Findings Form
Facility Representative Signature	Printed/Typed Name:	Bryce German
	Signature:	Obtained on the Inspection Verification/Findings Form

Photo Table



Number	1
Description	Containers not secured in Trailer 53R15063
Photographer	Theresa Pichtel
Facility Name	Tradebe Transport a/k/a Marport
Photo Date	6/5/2024
Others	Chuck Breitenfeldt Kari Clevenger Bryce German Michael Poe Michael Morgan



Number	2
Description	Close-up of Photo 1
Photographer	Theresa Pichtel
Facility Name	Tradebe Transport a/k/a Marport
Photo Date	6/5/2024
Others	Chuck Breitenfeldt Kari Clevenger Bryce German Michael Poe Michael Morgan



Number	3
Description	Trailer 53R13338 stored at Marport, no violations noted
Photographer	Theresa Pichtel
Facility Name	Tradebe Transport a/k/a Marport
Photo Date	6/5/2024
Others	Chuck Breitenfeldt Kari Clevenger Bryce German Michael Poe Michael Morgan



Number	4
Description	Trailer 53R08009 stored at Marport, no violations noted
Photographer	Theresa Pichtel
Facility Name	Tradebe Transport a/k/a Marport
Photo Date	6/5/2024
Others	Chuck Breitenfeldt Kari Clevenger Bryce German Michael Poe Michael Morgan



INSPECTION VERIFICATION/FINDINGS

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue
Indianapolis, Indiana 46204-2251
Telephone: (800) 451-6027 or (317) 232-8603
Web Page: http://www.in.gov/idem/

On 6/5/24 an inspection of Marport was conducted by the undersigned representative of the Indiana Department of Environmental Management (IDEM), Office of Land Quality.

Type of Inspection (may include more than one):

- Checkboxes for Routine Compliance Evaluation, Follow Up Inspection, Compliance Assistance Inspection, Complaint, Multi-Media Screening Evaluation, Other: Referral.

Inspection Findings:

These findings are considered preliminary and identify specific compliance issues discovered during the above-noted inspection that the designated agent of IDEM believes may be a violation of a statute(s), rule(s) or permit(s) issued by IDEM.

- Checkboxes for No violations were discovered, Violations were discovered but corrected, Violations require a submittal, Violations may subject to enforcement, Additional information/review is required, Other/Comments.

Confidential Information

In accordance with 329 IAC 6.1 (http://www.in.gov/legislative/iac/T03290/A00061.PDF) a person submitting information to the department for which confidential treatment is requested shall make a written claim of confidentiality at the time of submittal of the information.

Notice of Oral Report

In accordance with IC 13-14-5 an oral report of the inspection was provided to the undersigned Owner/Agent at the conclusion of the inspection. The oral report includes any specific matters discovered during the inspection that the IDEM representative believes may be a violation of a law or of a permit issued by the department.

IDEM Representative:

Theresa Pichtel

Printed Name

(317) 409-4501

Phone Number

Handwritten signature of Theresa Pichtel

Signature

tpichtel@idem.in.gov

Email

6/5/24

Date

9:00 / 12:45

Time In/ Out

Owner/Representative:

Bryce German

Printed Name

219-240-6191

Phone Number

Handwritten signature of Bryce German

Signature

Bryce.German@Tridco.com

Email

Env. MANAGER

Title

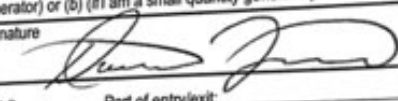

6/5/2024

Date

IDEM prefers to email your written report. Please check this box if you prefer to receive a copy of the inspection report via U.S. mail: []

	EST. DATE	DEPT. DATE	TYPE	OUTBOUND	QUANTITY	SHIPMENT NO.
53R15130	15-Mar	15-Mar	TRADEBE	TTR EC - ROSS	29	21356425
53R13258	15-Apr	15-Apr	TRADEBE	TTR EC - ROSS	75	21356473
53R10033	17-Apr	18-Apr	TRADEBE	TTR EC - ROSS	73	21356486
53R07054	24-Apr	25-Apr	TRADEBE	TTR EC - ROSS	78	21356495
53R15127	8-May	9-May	TRADEBE	TTR EC - ROSS	85	21356850
53R10056	6-May	7-May	TRADEBE	TTR EC - ROSS	104	21356849
53R13032	29-Apr	7-May	TRADEBE	TTR EC - ROSS	61	21356491
53R10050	13-May	15-May	TRADEBE	TTR EC - ROSS	39	21356868
53R12193	10-May	16-May	TRADEBE	TTR EC - ROSS	60	21356864
53R13046	16-May	23-May	TRADEBE	TTR EC - ROSS	98	21356880
53R13327	22-May	28-May	TRADEBE	TTR EC - ROSS	65	21356893
53R13065	20-May	29-May	TRADEBE	TTR EC - ROSS	94	21356888
53R12004	4-June	9-June	TRADEBE	TTR EC - ROSS	106	21356909

Please print or type.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number IND000646943	2. Page 1 of 2	3. Emergency Response Phone 8448738723	4. Manifest Tracking Number 021356910 JJK			
5. Generator's Name and Mailing Address NORTH AMERICAN WAREHOUSING CO 6800 W 68TH ST BEDFORD PARK, IL 60638		Generator's Site Address (if different than mailing address) TRADEBE TREATMENT AND RECYCLING 4343 KENNEDY AVENUE EAST CHICAGO, IN 46312		U.S. EPA ID Number IND000173497				
Generator's Phone: 6. Transporter 1 Company Name Tradebe Transportation LLC		7. Transporter 2 Company Name		U.S. EPA ID Number TND000772186				
8. Designated Facility Name and Site Address TRADEBE TREATMENT & RECYCLING OF TN 5485 VICTORY LANE MILLINGTON, TN 38053		Facility's Phone: 901-353-5291						
9a. HM		9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers No. Type	11. Total Quantity			
1. NON DOT / NON RCRA REGULATED MATERIAL				1	BA	56	P	13. Waste Codes
2. NON DOT / NON RCRA REGULATED MATERIAL				3	CF	150	P	
3. NON-REGULATED MATERIAL				32	DM	16000	P	
X 4. RQ NA3077, HAZARDOUS WASTE, SOLID, N.O.S. 9, III RQ(D009)				1	CF	477	P	D009
14. 001) ERG 1000259642 PO# 4502212111 002) ERG 1000242518 003) ERG 1000259286 004) ERG 171 DS022-21-TX16C6								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Offoror's Printed/Typed Name DUSTIN TOWNSEND		Signature 		Month Day Year 15 3 24				
16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.:						
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Josue Morcos		Signature 		Month Day Year 16 4 24				
18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection		Manifest Reference Number: U.S. EPA ID Number						
18b. Alternate Facility (or Generator) Facility's Phone: 18c. Signature of Alternate Facility (or Generator)		Month Day Year						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1.		2.		3.				
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name		Signature		Month Day Year				

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Please print or type.

UNIFORM HAZARDOUS WASTE MANIFEST
(Continuation Sheet)

21. Generator ID Number
IND000646943

22. Page
2 of 2

23. Manifest Tracking Number
021356910JJK

24. Generator's Name
TRADEBE TREATMENT AND RECYCLING

25. Transporter Company Name
0

U.S. EPA ID Number

26. Transporter Company Name
0

U.S. EPA ID Number

27a. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))

28. Containers

29. Total Quantity

30. Unit Wt./Vol.

31. Waste Codes

X 5. UN1814 POTASSIUM HYDROXIDE, SOLUTION 8 II RQ (D002)

4

TP

9 1 2 3

P

D002

32. Facility Identification Number and Additional Information
0057 ERG 154 1000448003

33. Transporter Acknowledgment of Receipt of Materials
Printed/Typed Name Signature Month Day Year

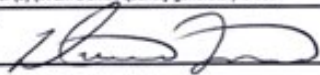
34. Transporter Acknowledgment of Receipt of Materials
Printed/Typed Name Signature Month Day Year

35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

GENERATOR
TRANSPORTER
DESIGNATED FACILITY

Please print or type.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number IND000646943	2. Page 1 of 2	3. Emergency Response Phone 8448738723	4. Manifest Tracking Number 021356908 JJK		
5. Generator's Name and Mailing Address CURTIS PACKAGING CORP 44 BERKSHIRE RD SANDY HOOK, CT 06482		219-397-3951		Generator's Site Address (if different than mailing address) TRADEBE TREATMENT AND RECYCLING 4343 KENNEDY AVENUE EAST CHICAGO, IN 46312			
Generator's Phone:				U.S. EPA ID Number			
6. Transporter 1 Company Name Tradebe Transportation LLC				U.S. EPA ID Number IND000123197			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address TRADEBE TREATMENT & RECYCLING OF TN 5485 VICTORY LANE MILLINGTON, TN 38053				901-353-5291		U.S. EPA ID Number TND000772186	
Facility's Phone:							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit WL/Vol	13. Waste Codes
	X	1 UN3266 WASTE CORROSIVE LIQUID, BASIC, INORGANIC, N.O.S. (SODIUM METASILICATE) 8 II RQ (D002)	3	DF	1980	P	D002
	X	2 NA3077 WASTE HAZARDOUS WASTE, SOLID, N.O.S. (SILVER CHLORIDE; SILVER BEHENA) 9 III RQ(D011)	1	DM	200	P	D011
	X	3 UN3264 WASTE CORROSIVE LIQUID, ACIDIC, INORGANIC, N.O.S. (HYDROCHLORIC ACID, FLUOBORIC ACID) 8 II RQ, (D002)	2	DM	420	P	D002
	X	4 UN3264 WASTE CORROSIVE LIQUID, ACIDIC, INORGANIC, N.O.S. (HYDROCHLORIC ACID, FLUOBORIC ACID) 8 II RQ, (D002)	3	DF	1320	P	D002
14. 001) ERG 154 3515D2HH1 PO: 4502211535 CUSTOMER PROFILE:3515D.SPENT PLATE DEVELOPER 002) ERG 171 A979049 003) ERG 154 1000135315 004) ERG 154 1000135315							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offeror's Printed/Typed Name Dustin Townsend				Signature 		Month Day Year 15/3/24	
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit:				
	Transporter signature (for exports only):		Date leaving U.S.:				
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials		Signature		Month Day Year		
	Transporter 1 Printed/Typed Name		Signature		Month Day Year		
DESIGNATED FACILITY	18. Discrepancy		Manifest Reference Number:		U.S. EPA ID Number		
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	18b. Alternate Facility (or Generator)						
	Facility's Phone:						
18c. Signature of Alternate Facility (or Generator)				Month Day Year			
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1.		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a							
Printed/Typed Name				Signature		Month Day Year	

Please print or type.

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	21. Generator ID Number IND000646943	22. Page 2 of 2	23. Manifest Tracking Number 021356908JJK
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TRADE TREATMENT AND RECYCLING

25. Transporter <u>0</u> Company Name	U.S. EPA ID Number
26. Transporter <u>0</u> Company Name	U.S. EPA ID Number

27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers		29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes		
		No.	Type					
X	5. UN3260 WASTE CORROSIVE SOLID, ACIDIC, INORGANIC, N.O.S. (SULFURIC ACID, HYDROCHLORIC ACID) 8 III RQ(D002)	2	DF	259	P	D002		
X	6. UN2922 WASTE CORROSIVE LIQUID, TOXIC, N.O.S. 8 (6.1) II RQ(D002,D004)	1	DF	200	P	D002 D006	D004 D007	D005 D008
X	7. UN3082 WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S. (SILVER) 9 III RQ(D011)	2	DF	240	P	D011		
	8. NON-REGULATED MATERIAL	8	DF	320	P			
	9. NON DOT / NON RCRA REGULATED MATERIAL	1	DM	121	P			
	10. NON-REGULATED MATERIAL	3	DF	268	P			
X	11. UN1719 CAUSTIC ALKALI LIQUIDS, N.O.S. (POTASSIUM HYDROXIDE, SODIUM HYDROXIDE) 8 II	4	DM	787	P			
	12. NON DOT / NON RCRA REGULATED MATERIAL	1	CW	1002	P			
X	13. NA3082 HAZARDOUS WASTE, LIQUID, N.O.S. (CHROMIUM) 9 III RQ(D002,D007)	4	DF	1760	P	D002	D007	
	14. NON DOT / NON RCRA REGULATED MATERIAL (BLEACH)	1	DF	175	P			

ERG 154 HACH 801 (006) ERG 154 1000197871 D009,D010,D011 (007) ERG 171 UOFC-604 (008) ERG UOFC-012 (009) ERG 88001 (010) ERG 1000334828 (011) ERG 154 SC800 (012) ERG 1000376012 (013) ERG 171 1000470734 (014) ERG 1000475878

GENERATOR

TRANSPORTER

DESIGNATED FACILITY

33. Transporter Acknowledgment of Receipt of Materials Printed/Typed Name	Signature	Month	Day	Year
34. Transporter Acknowledgment of Receipt of Materials Printed/Typed Name	Signature	Month	Day	Year
35. Discrepancy				
36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)				

ng
is
nts
43)

Date in

Date of May

MARPORT 10-DAY

06/05/24

Seal #		Date	Company	Product	Volume	Unit	Notes
	35413	28-May	UNIVAR	AMPAC	6/8	1ST	26050181
	P2211380	28-May	PREMIERE	AXALTA	6/8	2ND	22720300
4022260	35489	30-May	UNIVAR	GENESEE POLYMERS	6/8	1ST	19569304
4022188	70102	31-May	UNIVAR	BASF CORP	6/9	2ND	26050141
4022189	8290	31-May	HAZMAT	IMPACT NANO	6/9	2ND	25183173
4022199	33201	31-May	UNIVAR	CCL LABEL	6/9	2ND	25264163
4022200	35503	31-May	UNIVAR	HEWKE ADHESIVES	6/9	2ND	26050154
4022283	53R16064	4-Jun	TRADEBE	NACFAC	6/13	1ST	22720334
BOXES							
	21	EMPTY	2091	EMPTY			
		EMPTY	269	EMPTY			
		EMPTY	103	EMPTY			
	250C	EMPTY		FULL			
	2524	EMPTY		FULL			
		EMPTY		EMPTY			
ROSS OUTBOUNDS							
4021625	53R15130	29-Mar	TRADEBE	TTR EC - ROSS	4/7		21356425
4021991	53R13258	16-Apr	TRADEBE	TTR EC - ROSS	4/25		21356473
4022040	53R07054	25-Apr	TRADEBE	TTR EC - ROSS	5/4		21356485
4022090	53R10039	2-May	TRADEBE	TTR EC - ROSS	5/11		21356486
4022118	53R10058	7-May	TRADEBE	TTR EC - ROSS	5/16		21356849
4022119	53R13032	7-May	TRADEBE	TTR EC - ROSS	5/16		21356491
4022145	53R15127	10-May	TRADEBE	TTR EC - ROSS	5/19		21356850
4022161	53R12193	14-May	TRADEBE	TTR EC - ROSS	5/23		21356864
4022169	53R10050	15-May	TRADEBE	TTR EC - ROSS	5/24		21356868
4022222	53R13048	24-May	TRADEBE	TTR EC - ROSS	6/3		21356880
4022234	53R13327	28-May	TRADEBE	TTR EC - ROSS	6/5		21356893
	53R13065	4-Jun	TRADEBE	TTR EC - ROSS	6/13		21356888
4022239	53R12004	4-Jun	TRADEBE	TTR EC - ROSS	6/13		21356909
OUTBOUNDS							
4022237	53R14235	28-May	TRADEBE	TTR EC - STABLEX	6/5	1ST	21356862
4022235	53R13338	28-May	TRADEBE	TTR EC - ZA TO TN	6/6	1ST	21356896
4022248	53R05372	29-May	TRADEBE	TTR EC - FUEL TO TN	6/7	1ST	21356900
4022249	53R16067	29-May	TRADEBE	TTR EC - ZA TO TN	6/7	1ST	21356903
4022250	53R12045	29-May	TRADEBE	TTR EC - ZA TO TN	6/7	1ST	21356901
4022251	53R10058	29-May	TRADEBE	TTR EC - FUEL TO TN	6/7	1ST	21356906
4022263	B*4C	31-May	TRADEBE	TTR EC - STABLEX	6/9	1ST	21356899
4022264	53R12032	31-May	TRADEBE	TTR WI - FUEL TO TN	6/9	1ST	26440018
4022274	53R13048	3-Jun	TRADEBE	TTR EC - FUEL TO TN	6/12	1ST	21356918
4022275	53R16061	3-Jun	TRADEBE	TTR EC - FUEL TO TN	6/12	1ST	21356915
4022277	53R06081	3-Jun	TRADEBE	TTR EC - FUEL TO TN	6/12	1ST	21356913
4022278	53R06009	3-Jun	TRADEBE	TTR EC - CLEAN EARTH	6/12	1ST	21356912
4022288	53R13047	4-Jun	TRADEBE	TTR EC - MLOAD TO TN	6/13	1ST	2136910
4022290	53R18210	4-Jun	TRADEBE	TTR EC - MLOAD TO TN	6/13	1ST	2136920
4022294	53R13288	4-Jun	TRADEBE	TTR EC - FUEL TO TN	6/13	1ST	21356921
4022295	53R15118	4-Jun	TRADEBE	TTR EC - FUEL TO TN	6/13	1ST	21356919
4022296	53R06009	4-Jun	TRADEBE	TTR EC - FUEL TO TN	6/13	1ST	21356898
4022297	53R17092	4-Jun	TRADEBE	TTR EC - FUEL TO TN	6/13	1ST	21356911
4022298	53R15129	4-Jun	TRADEBE	TTR EC - IES	6/13	1ST	BOL #05082024RES
	53R13045	4-Jun	TRADEBE	TTR EC - WASTE MGMT - OREGON	6/13	1ST	01828313FLE
INTERCOMPANY							
4022088	53R12159	28-May	TRADEBE	TTR WI NDSO TO EC	6/5	3rd	25058450
4022223	1705A	28-May	TRADEBE	TTR WI NDSO TO EC	6/6	1ST	25058470
4022182	1705A	31-May	EWAY	TTR WI TO EC R/L/S/D	6/9	2ND	25058477
4022002	53R15063	31-May	TRADEBE	TTR TN TO EC SDS PESTICIDE	6/9	2ND	26510846
4022276	53R04202	3-Jun	TRADEBE	TTR TN RCV/18DS	6/12	1ST	26510932
4022258	53R16011	3-Jun	TRADEBE	TTR WI LAB PACK TO EC	6/12	2ND	25058487
4022285	53R12058	4-Jun	TRADEBE	TTR WI LABPACK TO EC	6/13	1ST	25058487
4022291	53R16064	4-Jun	TRADEBE	TTR WI AEROSOLS TO EC	6/13	1ST	25058484
EMPTY JUBS							
53R15128	TRADEBE	74-11-18E	MEYER			SERVICE	LE
53R15191	TRADEBE	74-11-18E	CLANNEY		4587	SERVICE	LE
53R16007	TRADEBE	74-11-18E	CLANNEY			D&O	LE
53R16010	TRADEBE	74-11-18E	ETG			D&O	ETG
53R16027	TRADEBE	74-11-18E	ETG		349458	RYDER	NEXCO
53R08343	TRADEBE	COOL-AIR LEAK	HAZMAT			RYDER	TRI STATE
PO-82	TRADEBE	B-240	HAZMAT	CHAR BOXES		8&J	20036
53R06197	TRADEBE	B-240	HAZMAT		36687	UNIVAR	TRANSWOOD
53R14037	TRADEBE	B-273	HAZMAT			UNIVAR	TRANSWOOD

PCI 117	TRADEBE			HAZMAT			UNIVAR		MXI
53R12108	TRADEBE	OOS/NO ANN		HAZMAT			UNIVAR		MXI
53R15062	TRADEBE	OOS/ABE	P221669	PREMER			UNIVAR	184096	TR-STATE
53R13259	TRADEBE		PTL 2221443	PREMER			UNIVAR	224174	TR-STATE
PCI 113L	TRADEBE		P5192550	PREMER			UNIVAR	234030	TR-STATE
PCI 97	TRADEBE		P232180	PREMER	CHAR TANKERS	BT-672	US ENV	18205	TR-STATE
53R13337	TRADEBE		P5037318	PREMER			US ENV	174022	TR-STATE
53R15134	TRADEBE	OOS/CRANK	5223	MXI					UNKNOWN
53R13208	TRADEBE	PALLETS	5208	MXI			UNIVAR	289375	AR PAQUETTE
	TRADEBE		5210	MXI			UNIVAR		AR PAQUETTE
53R06348	TRADEBE		5414	MXI			UNIVAR	275932	AR PAQUETTE
53R07046	TRADEBE		5221	MXI			UNKNOWN		AR PAQUETTE
53R15133	TRADEBE		5294	MXI					
53R15117	TRADEBE		1707A	EWAY					
53R18040	TRADEBE		1702A	EWAY					
PCI 110	TRADEBE		P221443	PREMER					
PCI 102L	TRADEBE								
PCI 78	TRADEBE								
PCI 135	TRADEBE								
PCI 119	TRADEBE								
PCI 143	TRADEBE								
INTERCOMPANY NON HAZ									
1251860	PCI 69		9-Mar	TRADEBE	TTR TN EMPTY DRUMS-OOS LEGS		2ND		BOL11172281
	PCI 36		19-Jan	TRADEBE	TTR TN - EMPTY DRUMS-OOS		OOS/NEEDS ANNUAL		BOL#7227
	PCI 23		5-Jul	PCI	TN EMPTY DRUMS		1ST		
4021868	4623		1-Aug	FLEET	TTR TN EMPTY DRUMS		1ST		
4021509	53R12041		29-Sep	TRADEBE	TTR TN EMPTY DRUMS		2ND		BOL# R12041
4021558	53R0242		10-Oct	TRADEBE	TTR TN EMPTY DRUMS		1ST		TTRW240329
4021377	53R15112		14-Sep	TRADEBE	TTR TN EMPTY DRUMS				R15112-0923