



ADVANCED CHEMICAL COMPANY
105 Bellows Street, Warwick, R.I. 02888
Tel: 401-785-3434 • Fax: 401-941-9210

Dear Customer:

I would like to take this opportunity to review Advanced Chemical Company's licenses and permits, and address our commitment to environmental compliance.

Advanced Chemical Company is a manufacturer of precious and semi-precious metal electroplating chemistries and wastewater treatment chemistries and technologies. In addition, we operate a state of the art precious metal refining operation under the provisions of the Code of Federal Regulations, Title 40, Part 266 Subpart F. We received our ISO 9002 registration in October of 1995 and our ISO 14001 registration in January of 2012. We have two- (2) USEPA Generator identification numbers (RID 0 5 9 7 3 5 7 6 1 for the 105 Bellows Street facility and RID 0 1 8 5 6 3 7 4 2 for the 131 Bellows Street facility). Our 45 Commerce Drive facility does not currently require an EPA identification number. We are currently permitted by The State of Rhode Island's Department of Environmental Management in the following areas.

For the incineration of precious metal bearing material:

APPROVAL #

Vent-O-Matic model CA-60 Incinerator	1044
United Group model G-466 Incinerator	1427
United Group model W-3000 Incinerator	2096

For air pollution control equipment:

DKT - 050 Fume Scrubber	1071
S-50 NOx IT Fume Scrubber	1072
KT - 100 Fume Scrubber	1073
KT - 010 Fume Scrubber	1074
S - 100 NOx IT Fume Scrubber	1092
DKT - 030 Fume Scrubber	1390
KT - 020 Fume Scrubber	1478
Torit Dust Collector DFT 2 - 4	1910
Torit Dust Collector DFT 3 - 12	1911
Torit Dust Collector DFO 2 - 8	2201
Wheelabrator Dust Collector 120 Jet III	Registered

For Storm Water Discharge associated with Industrial Activity:

Rhode Island Pollutant Discharge Elimination System (RIPDES) General Permit	RIR 50F009
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For hazardous waste transportation:

Hazardous waste transportation permit number RI-524

We are currently permitted and licensed to transport hazardous waste or precious metal bearing waste in the following states:

Connecticut:	CT-HW-383
Massachusetts:	PMB-02-002
New Hampshire:	TNH-0094
Vermont:	Vehicle Specific

For precious metal reclaim:

Precious metal refining N/A

The State of Rhode Island does not require the permitting of precious metal refiners at this time; however, they do require precious metal refiners to comply with 40 CFR part 266 subpart F.

We are permitted under the Warwick Sewer Authority for both sanitary and industrial activity (permit #702, #24, and #107). At our 105 Bellows Street facility, we operate a multistage wastewater pretreatment process that includes cyanide destruction, precipitation of heavy metals, pH adjustment, and solids removal. This operation generates a filter cake that is processed in-house for precious and semi-precious metal recovery. The filter cake is stored under the EPA guidelines established for F006 and F007 precious metal bearing hazardous waste. The effluent discharged from this process ends up at the publicly owned treatment works (Warwick Sewer Authority).

We audit all firms utilized by Advanced Chemical Company for the reclamation of precious and semi-precious metals as well as all firms used for hazardous waste disposal. The audits are conducted on a periodic basis and the results are kept on file for a period of three- (3) years.

Advanced Chemical administers contingency training for all employees annually under the provisions of Sara Title III, 40 CFR 265.50-56, and 29 CFR 1910.38. Employees responsible for hazardous waste handling are trained under RCRA provisions regarding generation, containerization, inspection, and documentation. Our hazardous waste truck drivers are trained annually under the provisions of federal guidelines and per the additional requirements of the five- (5) states listed above. In addition, plant employees receive training in Hazard Communication, Respirator Protection, Ladder Safety,

Lockout/Tagout, Laboratory Safety (Chemical Hygiene), Drum Handling, Chemical Safety, Forklift Operation, Fire Extinguisher Selection and Use, Personal Protective Equipment, US DOT, Back Safety, Bloodborne Pathogen Safety, First Aid, Coronary Pulmonary Resuscitation (CPR), and OSHA's Hazwoper Level 2 (1st Responder Operations Level).

Chemical resistant floors have been installed in our hazardous waste areas. Our refining and manufacturing areas are bermed to contain any spills that might occur. Spills are wet-vacuumed or absorbed with maizorb (or equivalent absorbent) and the collected material is processed to recover any precious metal value, no waste is generated from the spill cleanups.

Contingency plans have been submitted to the appropriate local emergency response personnel and to the State of Rhode Island. The Department of Homeland Security has determined that both our 105 and 131 Bellows Street facilities are classified at a Tier 4 risk level under the Chemical Facility Anti-Terrorism Standards (CFATS), 6 CFR Part 27. In addition, AAA Alarms provides our facility security and the precious metal content, of materials stored on-site, is insured against loss.

Although precious metal refiners are exempt from the certificate of destruction requirements stated in the Code of Federal Regulations, they are available upon customer request.

If you have any questions or require additional information in this area, please feel free to contact me at (401) 785-3434, ext. 117.

Respectfully,

ADVANCED CHEMICAL COMPANY



Charles J. Volpe
Environmental Engineer

CJV: cjb

Enclosures



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
75 Davis Street
Providence, R.I. 02908

27 June 1985

COPY

Jerry Smith
Advanced Chemical Co., Inc.
105 Bellows Street
Warwick, RI 02888

Dear Mr. Smith:

Please find enclosed the EPA Identification Number assigned to your facility.

If you have any questions, please contact me at 277-2797.

Sincerely,


Stephen Majkut,
Principal Engineer
Division of Air & Hazardous
Materials

S.M.

Jap

enc.



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
75 Davis Street
Providence, R.I. 02908

COPY COPY

9 April 1985

The EPA ID # assigned to this facility is:
RID059735761 *FB*

Mr. Frank Battaglia
Permits Branch
Environmental Protection Agency
John F. Kennedy Federal Building
Boston, MA 02203

Dear Mr. Battaglia:

Would you please provide the below named installation an EPA ID number pursuant to Paragraph 5 of the Interim Cooperative Agreement for Coordination of Hazardous Waste Regulatory Activities.

Required Information

- a. Name of installation Advanced Chemical Company Inc.
- b. Mailing address 105 Bellows Street
Warwick, RI 02888
- c. Location of installation same as above
- d. Name of installation contact Jerry Smith
Telephone number 785-3434
- e. Name of legal owner of installation Advanced Chemical Co., Inc.
- f. Type of hazardous waste activity Generator

i.e., Generator, Transporter, Treatment, Storage or Disposal.

Very truly yours,

Stephen Majkut
Stephen Majkut,
Principal Engineer
Division of Air & Hazardous
Materials



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DIVISION OF AIR AND HAZARDOUS MATERIALS
291 Promenade Street
Providence, R.I. 02908-5767

23 May 1990

Mr. Gerald Smith
Advanced Chemical Company
105 Bellows Street
Warwick, RI 02888

Dear Mr. Smith:

We have reviewed and approved your application for the installation of a Vent-O-Matic Model CA-60 incinerator at your 105 Bellows Street, Warwick facility (Approval #1044). As approved, this incinerator shall be used to process precious metal bearing material.

The operation of this incinerator shall be subject to the attached permit conditions and emission limitations. This approval does not relieve Advanced Chemical Company from compliance with applicable air pollution control rules and regulations.

The Division shall be notified, in writing, of any physical or operational change to the incinerator. Such notification shall include:

1. Information describing the nature of the change
2. Information describing the effect of the change on the emission of any air contaminant
3. The scheduled completion date of the planned change

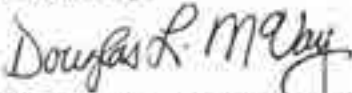
Any change which may result in an increased emission rate of any air contaminant shall be subject to approval of the Director.

This approval will remain in effect as long as the operation of the incinerator is satisfactory to the Director of the Department of Environmental Management.

COPY COPY

Additionally, be advised that Approval No. 959, previously issued to Advanced Chemical Company is being revoked since installation of the Vent-O-Matic CA-36 incinerator did not commence within one year of the date of issuance (16 March 1989).

Sincerely,



Douglas L. McVay, Principal Engineer
Division of Air and Hazardous Materials

cc: Richard Crenca, Warwick Building Inspector
Approval #959

grlsm.dm/111

YPOC

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
DIVISION OF AIR AND HAZARDOUS MATERIALS

PERMIT CONDITIONS AND EMISSION LIMITATIONS
APPROVAL NO. 1044
ADVANCED CHEMICAL COMPANY

COPY

A. Emission Limitations

1. Particulates

The concentration of particulate matter in the incinerator stack shall not exceed 0.08 grains per dry standard cubic foot (gr/dscf) corrected to 12 percent carbon dioxide (CO₂).

B. Operating Requirements

1. Prior to charging any waste to the incinerator, the secondary chamber temperature shall be preheated to 1800°F.
2. Operating temperature in the secondary chamber shall be maintained at 1800°F.
3. The incinerator shall be equipped with an interlock device which prevents the primary chamber loading door from being opened during the incineration process.
4. Visible emissions from the incinerator shall not exceed 10% opacity.

C. Continuous Monitoring

1. Secondary chamber temperature shall be monitored and recorded continuously. These records shall be maintained for a period of at least three years after the date of each record.
2. The secondary chamber thermocouple shall be located as close to the exit of the secondary chamber as is possible.

D. Other Permit Conditions

1. An operator shall always be in attendance when any of the incinerators at this facility are operating.



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DIVISION OF AIR AND HAZARDOUS MATERIALS
291 Promenade Street
Providence, R.I. 02908-6767

COPY

15 November 1990

Ms. Nancy E. Watson
Advanced Chemical Co.
105 Bellows Street
Warwick, RI 02888

Dear Ms. Watson:

The Division has reviewed six (6) applications for the installation of air pollution control equipment at your 105 Bellows Street, Warwick facility. On the basis of that review, approval is granted for installation of the following pieces of air pollution control equipment:

1. An Ambi Model DKT 050 horizontal, packed bed scrubber treating 5000 cfm of air exhausted from gold precipitation operations (Approval No. 1071).
2. An Ambi Model S-50 (NO_x, IT) packed tower scrubber treating 50 cfm of air exhausted from gold precipitation operations (Approval No. 1072).
3. An Ambi Model KT-100 horizontal, packed bed scrubber treating 10,000 cfm of air exhausted from cyanide destruction and the first stage of gold precipitation operations (Approval No. 1073).
4. An Ambi Model KT-010 horizontal, packed bed scrubber treating 1000 cfm of air exhausted from laboratory gold assaying operations (Approval No. 1074).

Your applications for installation of an afterburner and a scrubber to treat air exhausted from an evaporator are being returned to you since the evaporator is no longer in operation.

These approvals do not relieve Advanced Chemical Co. from compliance with applicable air pollution control rules and regulations. Approval of these applications is subject to the following conditions:

1. Visible emissions from each scrubber shall not exceed 10 percent opacity.
2. Sodium hypophosphite shall be used as a substitute material for hydrazine for gold precipitation operations. As a result, note that we have eliminated hydrazine as a pollutant in Section D of your applications.

Ms. Nancy E. Watson
Page 2
15 November 1990

COPY

3. Provisions shall be made for pH monitoring of the scrubbing liquid used in each scrubber. This can be accomplished either by use of a pH monitor, which continuously monitors and indicates the pH of the scrubbing liquid or by periodic sampling of the scrubbing liquid to determine pH. In either case, the pH of the scrubbing liquid should be checked a minimum of once per shift and the date, time, and measurement should be recorded. These records shall be made available to the Division or its representative upon request and shall be retained for a minimum of two years.

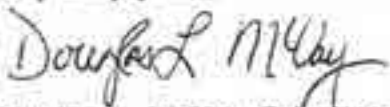
The Division shall be notified, in writing, of any physical or operational change to the scrubbers or the equipment vented to the scrubbers. Such notification shall include:

- Information describing the nature of the change.
- Information describing the effect of the change on the emission of any air contaminant.
- The scheduled completion date of the planned change.

Any change which may result in an increased emission rate of any air contaminant shall be subject to approval of the Director.

These approvals shall remain in effect as long as the operation of the scrubbers and associated equipment is satisfactory to the Director of the Department of Environmental Management.

Very truly yours,



Douglas L. McVay, Principal Engineer
Division of Air and Hazardous Materials

DLM:CAM

cc: Richard Crenca, Warwick Building Inspector

advnchm.app/CM



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DIVISION OF AIR AND HAZARDOUS MATERIALS
291 Promenade Street
Providence, R.I. 02908-5767

COPY

22 January 1991

Nancy Watson
Advanced Chemical Company
105 Bellows Street
Warwick, Rhode Island 02888

Dear Ms. Watson:

We have reviewed and approved your application for the installation of air pollution control equipment at your 105 Bellows Street, Warwick facility (Approval #1092). As approved, an Ambi Model S-100 NO_xIT packed bed scrubber shall be used only to treat emissions from two 150 gallon reaction kettles.

This approval does not relieve Advanced Chemical Company from compliance with applicable air pollution control rules and regulations. As a condition of approval, Advanced Chemical Company must make provisions for pH monitoring of the scrubbing liquid used in the scrubber and maintain records of these measurements. This can be accomplished either by use of a pH monitor which continuously monitors and indicates the pH of the scrubbing liquid or by periodic sampling of the scrubbing liquid to determine the pH. In either case, the pH of the scrubbing liquid should be checked at least once per shift and the date, time, and measurement should be recorded. These records shall be made available to the Division or its representatives upon request, and shall be retained for a minimum of two years.

The Division shall be notified, in writing, of any planned physical or operational change to the scrubber or the equipment exhausted to the scrubber. Such notification shall include:

- * Information describing the nature of the change.
- * Information describing the effect of the change on the emission of any air contaminant.
- * The scheduled completion date of the planned change.

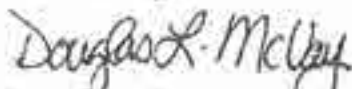
Any change which may result in an increased emission rate of any air contaminant shall be subject to approval of the Director.

Nancy Watson
22 January 1991
Page 2

COPY

This approval will remain in effect as long as the operation of the equipment is satisfactory to the Director of the Department of Environmental Management.

Sincerely,



Douglas L. McVay, Principal Engineer
Division of Air and Hazardous Materials

DM:LSA

cc: Warwick Building Official

ncywatsn.dm



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Environmental Management
DIVISION OF AIR RESOURCES
291 Promenade Street
Providence, R.I. 02908-5767

COPY

10 September 1996

Mr. Charles J. Volpe, Environmental Manager
Advanced Chemical Company
105 Bellows Street
Warwick, RI 02888

Dear Mr. Volpe:

The Department of Environmental Management, Division of Air Resources has reviewed and approved your application for the installation of an Ambi, Model No. DKT - 030 crossflow scrubber at your 105 Bellows Street, Warwick facility.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval No. 1390).

Sincerely,


Douglas L. McVay
Associate Supervising Engineer

cc: Warwick Building Official

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
DIVISION OF AIR RESOURCES

MINOR SOURCE PERMIT
ADVANCED CHEMICAL COMPANY

APPROVAL NO. 1390

COPY

Pursuant to the provisions of Air Pollution Control Regulation No. 9, this minor source permit is issued to:

Advanced Chemical Company

For the following:

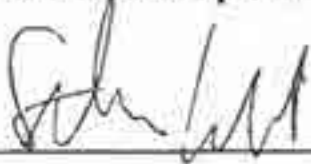
Installation of an Ambi, Model No. DKT - 030 caustic scrubber (Approval No. 1390)

to treat acid emissions generated from six (6) fiberglass treatment tanks and two (2)

acid transfer stations prior to discharge to the atmosphere.

Located at: 105 Bellows Street, Warwick

This permit shall be effective from the date of its issuance and shall remain in effect until revoked by or surrendered to the Department. This permit does not relieve *Advanced Chemical Company* from compliance with applicable state and federal air pollution control rules and regulations. The design, construction and operation of this equipment shall be subject to the attached permit conditions and emission limitations.



Stephen Majkut, Chief
Division of Air Resources

9 SEP 96

Date of issuance

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
DIVISION OF AIR RESOURCES

Permit Conditions and Emission Limitations

ADVANCED CHEMICAL COMPANY

APPROVAL NO. 1390

COOPY

A. Emission Limitations

1. Emissions of acid fumes from the waste water treatment tanks and acid transfer stations shall be reduced by 99% or greater before discharge to the atmosphere.

B. Operating Requirements

1. All emissions generated from the waste water treatment tanks and acid transfer stations shall be captured, contained and routed to the scrubber for treatment prior to discharge to the atmosphere.
2. The pH of the scrubbing liquid shall be checked a minimum of once per shift and the date, time, and measurement shall be recorded.

C. Recordkeeping and Reporting

1. The owner/operator shall maintain the following records:
 - a. The number of batches per month processed in the waste water treatment operation.
2. The owner/operator shall notify the Division, in writing, of the date of actual initial start-up of the scrubber no later than fifteen days after such date.
3. The owner/operator shall notify the Division of any anticipated noncompliance with the terms of this permit or any other applicable air pollution control rules and regulations.
4. The Division shall be notified in writing of any planned physical or operational change to the scrubber or the equipment discharging to the scrubber. Such notification shall include:
 - a. Information describing the nature of the change.

- b. Information describing the effect of the change on the emission of any air contaminant.
- c. The scheduled completion date of the planned change.

Any change which may result in an increased emission rate of any air contaminant shall be subject to approval of the Director.

5. All records required as a condition of this approval must be made available to the Division or its representative upon request. These records must be maintained for a minimum of three years after the date of each record.

E. Other Permit Conditions

1. To the extent consistent with the requirements of this approval and applicable Federal and State laws, the facility shall be designed, constructed and operated in accordance with the representation of the facility in the permit application.
2. There shall be no bypassing of the air pollution control equipment during times when the waste water treatment equipment is operated.
3. Employees of the Division and its authorized representatives shall be allowed to enter the facility at all times for the purpose of inspecting any air pollution source, investigating any condition it believes may be causing air pollution or examining any records required to be maintained by the Division.

advachem.app

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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Environmental Management
Office of Air Resources
235 Promenade Street, Room 230
Providence, RI 02908

26 September 1997

Mr. Charles J. Volpe
Environmental Manager
Advanced Chemical Company
105 Bellows Street
Warwick, RI 02888

Dear Mr. Volpe:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your application for the installation of process equipment at your 105 Bellows, Warwick facility.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval No. 1427).

Sincerely,


Douglas L. McVay
Associate Supervising Engineer

cc: Warwick Building Official

COPY

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR RESOURCES

MINOR SOURCE PERMIT

ADVANCED CHEMICAL COMPANY

APPROVAL NO. 1427

Pursuant to the provisions of Air Pollution Control Regulation No. 9, this minor source permit is issued to:

Advanced Chemical Company

For the following:

Installation of an United Group Inc. Model No. G-466 reclamation inclinerator (Approval No. No. 1427) to process precious metal bearing material.

Located at: *105 Bellows Street, Warwick*

This permit shall be effective from the date of its issuance and shall remain in effect until revoked by or surrendered to the Department. This permit does not relieve *Advanced Chemical Company* from compliance with applicable state and federal air pollution control rules and regulations. The design, construction and operation of this equipment shall be subject to the attached permit conditions and emission limitations.



Stephen Majkut, Chief
Office of Air Resources

23 SEP 97

Date of issuance

COPY

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR RESOURCES

Permit Conditions and Emissions Limitations

ADVANCED CHEMICAL COMPANY

Approval No. 1427

A. Emission Limitations

1. Particulate Matter

The concentration of particulate matter in the exhaust flue shall not exceed 0.08 grains per dry standard cubic foot (0.08 gr/dscf) corrected to 12% CO₂.

B. Operating Requirements

1. The incinerator shall be equipped with an interlock to prevent the primary burner from firing unless the secondary chamber temperature is at or above 1800°F.
2. The secondary chamber temperature shall be maintained at a minimum of 1800°F, and the secondary chamber volume shall be of sufficient capacity to provide a minimum residence time for combustion gases of one second at 1800°F.
3. Visible emissions from the incinerator exhaust flue shall not exceed 10% opacity (six minute average).
4. The secondary chamber thermocouple shall be located as close to the secondary chamber exit as possible or at a location that represents a minimum of a one second residence time at 1800°F.
5. An operator shall always be in attendance whenever the incinerator is operating.
6. Operation of the incinerator shall be consistent with the operating procedures included with the permit application except where conditions of this approval may indicate otherwise.

C. Continuous Monitors

1. The secondary chamber temperature shall be monitored and recorded continuously.



D. Recordkeeping and Reporting

1. The owner/operator shall maintain the following records concerning the process equipment and waste material:
 - a. The daily operating hours of the incinerator.
 - b. The number of batches processed in the incinerator each day.
 - c. A description of the waste material processed in the incinerator for each batch.
 - d. The operating temperature of the secondary chamber.
2. The owner/operator shall notify the Office of Air Resources, in writing, of the date of actual initial start-up of the incinerator no later than fifteen days after such date.
3. The owner/operator shall notify the Office of Air Resources of any non compliance with the terms of this permit, in writing, within 48 hours of the occurrence.
4. The owner/operator shall notify the Office of Air Resources in writing of any planned physical or operational change to the equipment. Such notification shall include:
 - a. Information describing the nature of the change.
 - b. Information describing the effect of the change on the emission of any air contaminant.
 - c. The scheduled completion date of the planned change.

Any change which may result in an increased emission rate of any air contaminant shall be subject to approval of the Director.

5. All records required in this permit shall be maintained for a minimum of three years after the date of each record and shall be made available to representatives of the Office of Air Resources upon request.

E. Other Permit Conditions

1. To the extent consistent with the requirements of this permit and applicable federal and state laws, the facility shall be designed, constructed and operated in accordance with the representation of the facility in the permit application.

2. Employees of the Office of Air Resources and its authorized representatives shall be allowed to enter the facility at all times for the purpose of inspecting any air pollution source, investigating any condition it believes may be causing air pollution or examining any records required to be maintained by the Office of Air Resources.
3. The owner/operator shall shut down the incinerator in the event of a malfunction of the unit's air pollution control equipment that results in, or that could result in, emissions in excess of the permit limits. The incinerator shall remain shutdown until the malfunction has been identified and corrected.

advanchem.app

COPY



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-831-5508

13 January 1999

Charles J. Volpe, Environmental Manager
ADVANCED CHEMICAL COMPANY
131 Bellows Street
Warwick, RI 02888

COPY

Dear Mr. Volpe:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your application for the installation of an Ambi, Model No. KT-020 fume scrubber at your 131 Bellows Street, Warwick facility.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval No. 1478).

If there are any questions concerning this permit, please contact me at 222-2808, extension 7011.

Sincerely,

Douglas L. McVay
Associate Supervising Engineer
Office of Air Resources

cc: Warwick Building Official

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR RESOURCES

MINOR SOURCE PERMIT
ADVANCED CHEMICAL COMPANY

APPROVAL NO. 1478

COPY

Pursuant to the provisions of Air Pollution Control Regulation No. 9, this minor source permit is issued to:

Advanced Chemical Company

For the following:

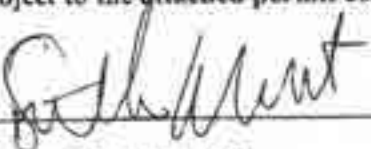
Installation of an Ambi, Model No. KT-020 fume scrubber (Approval No. 1478) to treat

emissions generated from Hood No. 1 in the Manufacturing Department.

Located at:

131 Bellows Street, Warwick

This permit shall be effective from the date of its issuance and shall remain in effect until revoked by or surrendered to the Department. This permit does not relieve *Advanced Chemical Company* from compliance with applicable state and federal air pollution control rules and regulations. The design, construction and operation of this equipment shall be subject to the attached permit conditions and emission limitations.



Stephen Majkut, Chief
Office of Air Resources

12 JAN 99

Date of issuance

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR RESOURCES

Permit Conditions and Emission Limitations

ADVANCED CHEMICAL COMPANY

APPROVAL NO. 1478

COPY

A. Emission Limitations

1. Emissions of acid fumes from Hood No. 1 shall be reduced by 99.5% or greater before discharge to the atmosphere.
2. Visible emissions from the scrubber exhaust shall not exceed 10% opacity (six-minute average).

B. Operating Requirements

1. All emissions generated from Hood No. 1 shall be captured, contained and routed to the scrubber for treatment prior to discharge into the atmosphere.
2. The pH of the scrubbing liquid shall be checked a minimum of once per shift and the date, time, and measurement shall be recorded.

C. Recordkeeping and Reporting

1. The owner/operator shall maintain records of the pH measurements for the scrubber.
2. The owner/operator shall notify the Office of Air Resources, in writing, of the date of actual initial start-up of the scrubber no later than fifteen days after such date.
3. The owner/operator shall notify the Office of Air Resources of any anticipated noncompliance with the terms of this permit or any other applicable air pollution control rules and regulations.
4. The Office of Air Resources shall be notified in writing of any planned physical or operational change to the scrubber or the equipment discharging to the scrubber. Such notification shall include:
 - a. Information describing the nature of the change.
 - b. Information describing the effect of the change on the emission of any air contaminant.

COPY

- c. The scheduled completion date of the planned change.

Any change which may result in an increased emission rate of any air contaminant shall be subject to approval of the Director.

5. All records required as a condition of this approval must be made available to the Office of Air Resources or its representative upon request. These records must be maintained for a minimum of three years after the date of each record.

D. Other Permit Conditions

1. To the extent consistent with the requirements of this approval and applicable Federal and State laws, the facility shall be designed, constructed and operated in accordance with the representation of the facility in the permit application.
2. There shall be no bypassing of the air pollution control equipment during times when Hood No. 1 is in use.
3. Employees of the Office of Air Resources and its authorized representatives shall be allowed to enter the facility at all times for the purpose of inspecting any air pollution source, investigating any condition it believes may be causing air pollution or examining any records required to be maintained by the Office of Air Resources.

ADCHMPER.DOC



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD (401) 222-4462

15 November 2002

Mr. Charles J. Volpe
Environmental Manager
ADVANCED CHEMICAL COMPANY
105 Bellows Street
Warwick, RI 02888

COPY

Dear Mr. Volpe:

The Office of Air Resources is in receipt of your 16 October 2002 application for registration of air pollution control equipment to be located at your 131 Bellows Street, Warwick, RI facility.

The air pollution control equipment is to consist of a Wheelabrator dust collector (Model 120 Jet III) which will be used to treat particulate emissions generated from the smelting of gold, silver, and platinum metal group jewelry, dental and industrial scrap.

This registration does not relieve Advanced Chemical Company from compliance with applicable state and federal air pollution control rules and regulations. In particular, this registration does not relieve Advanced Chemical Company from compliance with Air Pollution Control Regulation No. 16, entitled "Operation of Air Pollution Control Systems". This regulation requires, in part, that "...any air pollution control system shall be operated according to its design specifications whenever the source on which it is installed is in operation or is emitting air contaminants..."

If you should have any questions, I can be reached at 401/222-2808, extension 7415.

Sincerely,

Donna J. LaCroix
Air Quality Specialist
Office of Air Resources

cc: OAR files



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

12 September 2006

Mr. Charles Volpe
Advanced Chemical Company
131 Bellows Street
Warwick, RI 02888

Dear Mr. Volpe:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your application for the installation of air pollution control equipment at your 105 Bellows Street, Warwick facility.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval Nos. 1910-1911).

If there are any questions concerning this permit, please contact me at 222-2808, extension 7011.

Sincerely,

A handwritten signature in black ink that reads "Douglas L. McVay".

Douglas L. McVay
Associate Supervising Engineer
Office of Air Resources

COPY

cc: Warwick Building Official

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR RESOURCES

MINOR SOURCE PERMIT

ADVANCED CHEMICAL COMPANY

APPROVAL NOs. 1910-1911

Pursuant to the provisions of Air Pollution Control Regulation No. 9, this minor source permit is issued to:

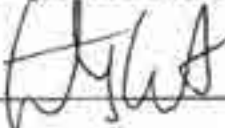
Advanced Chemical Company

For the following:

Installation of two (2) Torit dust collectors, Models DFT 2-4 (Approval No. 1910) and DFT 3-12 (Approval No. 1911), to control particulate emissions from the ball mill and sifting operations.

Located at: *105 Bellows Street, Warwick, RI*

This permit shall be effective from the date of its issuance and shall remain in effect until revoked by or surrendered to the Department. This permit does not relieve *Advanced Chemical Company* from compliance with applicable state and federal air pollution control rules and regulations. The design, construction and operation of this equipment shall be subject to the attached permit conditions and emission limitations.


Stephen Majkut, Chief
Office of Air Resources

12 SEP 06
Date of issuance

COPY

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR RESOURCES

Permit Conditions and Emission Limitations

ADVANCED CHEMICAL COMPANY

APPROVAL NOs. 1910-1911

A. Emission Limitations

1. Particulate matter generated from the ball mill and sifting operations shall be captured, contained, and routed to the dust collectors for treatment prior to discharge to the atmosphere.
2. The filter cartridges used in each dust collector shall be Tort-Built® Ultra-Web filters or its equivalent in terms of filtration efficiency.
3. Visible emissions from the exhaust shall not exceed 10% opacity (six-minute average).

B. Continuous Monitors

1. The pressure drop across each dust collector shall be monitored continuously and checked a minimum of once per day and the date, time and measurement shall be recorded.

C. Recordkeeping and Reporting

1. The owner/operator shall maintain records of the daily pressure drop measurement of each dust collector.
2. The owner/operator shall notify the Office of Air Resources, in writing, of the date of actual initial start-up of each of the two dust collectors no later than fifteen days after such date.
3. The owner/operator shall notify the Office of Air Resources of any anticipated noncompliance with the terms of this permit or any other applicable air pollution control rules and regulations.
4. The owner/operator shall notify the Office of Air Resources in writing of any planned physical or operational change to any equipment that would:
 - Change the representation of the facility in the application.

COPY

- Alter the applicability of any state or federal air pollution rules or regulations.
- Result in the violation of any terms or conditions of this permit.
- Qualify as a modification under APC Regulation No. 9.

Such notification shall include:

- a. Information describing the nature of the change.
- b. Information describing the effect of the change on the emission of any air contaminant.
- c. The scheduled completion date of the planned change.

Any such change shall be consistent with the appropriate regulation and have the prior approval of the Director.

5. The owner/operator shall notify the Office of Air Resources, in writing, of any noncompliance with the terms of this permit within 30 calendar days of becoming aware of such occurrence and supply the Director with the following information:
 - a. The name and location of the facility;
 - b. The subject source(s) that caused the noncompliance with the permit term;
 - c. The time and date of first observation of the incident of noncompliance;
 - d. The cause and expected duration of the incident of noncompliance;
 - e. The estimated rate of emissions (expressed in lbs/hr or lbs/day) during the incident and the operating data and calculations used in estimating the emission rate;
 - f. The proposed corrective actions and schedule to correct the conditions causing the incidence of noncompliance.
6. All records required as a condition of this approval must be made available to the Office of Air Resources or its representative upon request. These records must be maintained for a minimum of five years after the date of each record.

COPY

D. Other Permit Conditions

1. To the extent consistent with the requirements of this approval and applicable Federal and State laws, the facility shall be designed, constructed and operated in accordance with the representation of the facility in the permit application.
2. There shall be no bypassing of the air pollution control equipment at any time.
3. Employees of the Office of Air Resources and its authorized representatives shall be allowed to enter the facility at all times for the purpose of inspecting any air pollution source, investigating any condition it believes may be causing air pollution or examining any records required to be maintained by the Office of Air Resources.
4. At all times, including periods of startup, shutdown and malfunction, the permittee shall, to the extent practicable, maintain and operate the facility in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Office of Air Resources which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the source.

F. Malfunctions

1. A malfunction of any air pollution control system that would result in the exceedance of any emission limitation applicable to this facility will necessitate the shutdown of the process discharging to the dust collectors. The process must remain shutdown until the malfunction has been identified and corrected.
2. The owner/operator may seek to establish that a malfunction of any air pollution control system that would result in noncompliance with any of the terms of this permit or any other applicable air pollution control rules and regulations was due to unavoidable increases in emissions attributable to the malfunction. To do so, the owner/operator must demonstrate to the Office of Air Resources that:
 - a. The malfunction was not attributable to improperly designed air pollution control equipment, lack of preventative maintenance, careless or improper operation, or operator error;
 - b. The malfunction was not part of a recurring pattern indicative of inadequate design, operation, or maintenance;
 - c. Repairs were performed in an expeditious fashion. Off-shift labor and overtime should be utilized, to the extent practicable, to ensure that such repairs were completed as expeditiously as practicable.
 - d. All possible steps were taken to minimize emissions during the period of time that the repairs were performed.

- e. Emissions during the period of time that the repairs were performed will not:
 - (1) Cause an increase in the ground level ambient concentration at or beyond the property line in excess of that allowed by Air Pollution Control Regulation No. 22 and any Calculated Acceptable Ambient Levels; and
 - (2) Cause or contribute to air pollution in violation of any applicable state or national ambient air quality standard.
- f. The reasons that it would be impossible or impractical to cease the source operation during said period.
- g. The owner/operator's action in response to the excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence.

This demonstration must be provided to the Office of Air Resources, in writing, within two working days of the time when the malfunction occurred and contain a description of the malfunction, any steps taken to minimize emissions and corrective actions taken.

The owner/operator shall have the burden of proof in seeking to establish that noncompliance was due to unavoidable increases in emissions attributable to the malfunction.

COPY



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

March 8, 2010

Mr. Charles Volpe
Environmental Manager
Advanced Chemical Company
131 Bellows Street
Warwick, RI 02888

Dear Mr. Volpe:

Based on your company's recent submittal of "Notification of Regulated Waste Activity" (Form 8700-12), this office has issued EPA ID number RID018563742 to Advanced Chemical Company located at 131 Bellows Street, in Warwick. This number must be used on all manifests accompanying shipments of hazardous waste from this specific location.

Please keep a copy of this correspondence in order to avoid any confusion regarding the use of EPA ID numbers.

If you have any questions, please feel free to contact me at 401-222-1360, ext. 7516.

Sincerely,

Robert J. Nero
Environmental Scientist

COPY



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

26 March 2010

Mr. Charles J. Volpe
Environmental Manager
Advanced Chemical Company
105 Bellows Street
Warwick, RI 02888

COPY

Dear Mr. Volpe:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your application for the installation of an incinerator at your 105 Bellows Street, Warwick facility.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval No. 2096).

I can be reached at 222-2808, extension 7020 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "P. Crump".

Pamela E. Crump, EIT
Air Quality Specialist
Office of Air Resources

cc: Warwick Building Official
Paul C. "Pete" Toy, Jr. - Toyenco, Inc.



30% post-consumer fiber

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR RESOURCES

MINOR SOURCE PERMIT

ADVANCED CHEMICAL COMPANY

APPROVAL NO. 2096

Pursuant to the provisions of Air Pollution Control Regulation No. 9, this minor source permit is issued to:

Advanced Chemical Company

For the following:

Installation of a United Model No. W-3000-HT dual chamber incinerator to process precious metal bearing material

COPY

Located at: *105 Bellows Street, Warwick*

This permit shall be effective from the date of its issuance and shall remain in effect until revoked by or surrendered to the Department. This permit does not relieve *Advanced Chemical Company* from compliance with applicable state and federal air pollution control rules and regulations. The design, construction and operation of this equipment shall be subject to the attached permit conditions and emission limitations.

Douglas L. McVay
Douglas L. McVay, Acting Chief
Office of Air Resources

3/26/10
Date of issuance

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR RESOURCES

Permit Conditions and Emissions Limitations

ADVANCED CHEMICAL COMPANY

Approval No. 2096

A. Emission Limitations

1. Particulate Matter

The concentration of particulate matter in the exhaust flue shall not exceed 0.08 grains per dry standard cubic foot (0.08 gr/dscf) corrected to 12% CO₂.

2. Visible emissions from the incinerator exhaust flue shall not exceed 10% opacity (six-minute average).

B. Operating Requirements

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1. The incinerator shall not be loaded unless the secondary chamber temperature is at or above 1800°F.
2. The secondary chamber temperature shall be maintained at a minimum of 1800°F, and the secondary chamber volume shall be of sufficient capacity to provide a minimum residence time for combustion gases of one second at 1800°F.
3. The secondary chamber thermocouple shall be located as close to the secondary chamber exit as possible or at a location that represents a minimum of a one second residence time at 1800°F.
4. An operator shall always be in attendance whenever the incinerator is operating.
5. Operation of the incinerator shall be consistent with the operating procedures included with the permit application except where conditions of this approval may indicate otherwise.
6. An incinerator operating procedures manual shall be maintained on-site at all times. All personnel who operate the incinerator shall be familiar with the operating procedures.

C. Continuous Monitors

1. The secondary chamber temperature shall be monitored and recorded continuously.

D. Recordkeeping and Reporting

1. The owner/operator shall maintain the following records concerning the process equipment and waste material:
 - a. The daily operating hours of the incinerator.
 - b. The number of batches processed in each chamber in the incinerator each day including the date and time the incinerator is loaded for each batch.
 - c. The weight of each batch in pounds.
 - d. A description of the waste material processed in the incinerator for each batch.
 - e. The operating temperature of the secondary chamber.
2. The owner/operator shall notify the Office of Air Resources, in writing, of the date of actual initial start-up of the incinerator no later than fifteen days after such date.
3. The owner/operator shall notify the Office of Air Resources of any anticipated noncompliance with the terms of this permit or any other applicable air pollution control rules and regulations.
4. The owner/operator shall notify the Office of Air Resources in writing of any planned physical or operational change to any equipment that would:
 - a. Change the representation of the facility in the application.
 - b. Alter the applicability of any state or federal air pollution rules or regulations.
 - c. Result in the violation of any terms or conditions of this permit.
 - d. Qualify as a modification under APC Regulation No. 9.Such notification shall include:

COPY

- Information describing the nature of the change.
- Information describing the effect of the change on the emission of any air contaminant.
- The scheduled completion date of the planned change.

Any such change shall be consistent with the appropriate regulation and have the prior approval of the Director.

5. The owner/operator shall notify the Office of Air Resources, in writing, of any noncompliance with the terms of this permit within 30 calendar days of becoming aware of such occurrence and supply the Director with the following information:
 - a. The name and location of the facility;
 - b. The subject source(s) that caused the noncompliance with the permit term;
 - c. The time and date of first observation of the incident of noncompliance;
 - d. The cause and expected duration of the incident of noncompliance;
 - e. The estimated rate of emissions (expressed in lbs/hr or lbs/day) during the incident and the operating data and calculations used in estimating the emission rate;
 - f. The proposed corrective actions and schedule to correct the conditions causing the incidence of noncompliance.

6. All records required in this permit shall be maintained for a minimum of five years after the date of each record and shall be made available to representatives of the Office of Air Resources upon request.

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E. Other Permit Conditions

1. To the extent consistent with the requirements of this permit and applicable federal and state laws, the facility shall be designed, constructed and operated in accordance with the representation of the facility in the permit application.
2. Employees of the Office of Air Resources and its authorized representatives shall be allowed to enter the facility at all times for the purpose of inspecting any air pollution source, investigating any condition it believes may be causing air pollution or examining any records required to be maintained by the Office of Air Resources.

3. At all times, including periods of startup, shutdown and malfunction, the owner/operator shall, to the extent practicable, maintain and operate the facility in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Office of Air Resources, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

F. Malfunctions

1. The owner/operator shall shut down the incinerator in the event of a malfunction that results in, or that could result in, emissions in excess of the permit limits. The incinerator shall remain shutdown until the malfunction has been identified and corrected.
2. The owner/operator may seek to establish that a malfunction that would result in noncompliance with any of the terms of this permit or any other applicable air pollution control rules and regulations was due to unavoidable increases in emissions attributable to the malfunction. To do so, the owner/operator must demonstrate to the Office of Air Resources that:
 - a. The malfunction was not attributable to improperly designed equipment, lack of preventative maintenance, careless or improper operation or operator error;
 - b. The malfunction is not part of a recurring pattern indicative of inadequate design, operation or maintenance;
 - c. Repairs were performed in an expeditious fashion.
 - d. All reasonable steps were taken to minimize emissions during the period of time that repairs were performed.
 - e. Emissions during the period of time that the repairs were performed will not:
 - (1) Cause and increase in the ground level ambient concentration at or beyond the property line in excess of that allowed by Air Pollution Control Regulation No. 22 and any Calculated Acceptable Ambient Levels; and
 - (2) Cause or contribute to air pollution in violation of any applicable state or national ambient air quality standard.

COPY

- f. The reasons that it would be impossible or impractical to cease the source operation during said period.
- g. The owner/operator's actions in response to the excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence.

This demonstration must be provided to the Office of Air Resources within two working days of the time when the malfunction occurred and contain a description of the malfunction, any steps taken to minimize emissions and corrective actions taken.

The owner/operator shall have the burden of proof in seeking to establish that noncompliance was due to unavoidable increases in emissions attributable to the malfunction.

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RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4463

20 February 2013

Charles J. Volpe
Environmental Manager
Advanced Chemical Company
131 Bellows Street
Warwick, RI 02888

Dear Mr. Volpe:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your application for the installation of air pollution control equipment at your 45 Commerce Drive, Warwick facility.

Enclosed is a minor source permit issued pursuant to our review of your application (Approval No. 2201).

If there are any questions concerning this permit, please contact me at 222-2808, extension 7415.

Sincerely,

Carlene B. Newman

Carlene B. Newman
Air Quality Specialist
Office of Air Resources

COPY

cc: Warwick Building Official



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR RESOURCES

MINOR SOURCE PERMIT

ADVANCED CHEMICAL COMPANY

APPROVAL NO. 2201

Pursuant to the provisions of Air Pollution Control Regulation No. 9, this minor source permit is issued to:

Advanced Chemical Company

For the following:

*Installation of a Torit dust collector, Model DFO 2-8 to control particulate emissions from
the mechanical shredding operation.*

Located at: *45 Commerce Drive, Warwick, RI (west side of bldg)*

This permit shall be effective from the date of its issuance and shall remain in effect until revoked by or surrendered to the Department. This permit does not relieve *Advanced Chemical Company* from compliance with applicable state and federal air pollution control rules and regulations. The design, construction and operation of this equipment shall be subject to the attached permit conditions and emission limitations.



Douglas L. McVay, Chief
Office of Air Resources

2/20/13

Date of issuance

COPY

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR RESOURCES

Permit Conditions and Emission Limitations

ADVANCED CHEMICAL COMPANY

APPROVAL NO. 2201

A. Emission Limitations

1. Particulate matter generated from the mechanical shredding process shall be captured, contained, and routed to the Torit Model DFO 2-8 dust collector for treatment. Particulate matter from the process shall be reduced by 99.9% or greater before discharge to the atmosphere.
2. Visible emissions from the exhaust vent of the dust collector shall not exceed 10% opacity (six-minute average).

B. Monitoring Requirements

1. The pressure drop across the dust collector shall be monitored continuously and checked a minimum of once per day and the date, time and measurement shall be recorded.
2. The owner/operator shall, on a weekly basis, conduct visual inspections of the dust collection system's ductwork for leaks.
3. The owner/operator shall conduct inspections of the interior of the dust collector for structural integrity every 12 months.
4. The owner/operator shall inspect and change out the Ultra-Web filters according to manufacturer specifications.

C. Initial Testing

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1. The owner/operator shall collect and analyze a grab sample of particulate matter from the dust collector once every three months during the first 12 months of operation following issuance of this permit. Each sample shall be analyzed for the following metals: antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, copper, lead, manganese, mercury, molybdenum, nickel, selenium, vanadium, and zinc.
2. A final report of the analytical results shall be submitted to the Office of Air Resources no later than 60 days following the completion of the sampling period.

D. Recordkeeping and Reporting

1. The owner/operator shall maintain records of the daily pressure drop measurements of the dust collector and the date and amount of dust collected each time the drum is emptied.
2. The owner/operator shall maintain records of all inspection data. Such records shall include:
 - a. The date, place and time of the inspection;
 - b. Person conducting the inspection;
 - c. Technique or method used;
 - d. Operating conditions during the inspection;
 - e. Results of the inspection; and
 - f. Any maintenance action taken.
3. The owner/operator shall notify the Office of Air Resources, in writing, of the date of actual initial start-up of the dust collector no later than fifteen days after such date.
4. The owner/operator shall notify the Office of Air Resources of any anticipated noncompliance with the terms of this permit or any other applicable air pollution control rules and regulations.
5. The owner/operator shall notify the Office of Air Resources in writing of any planned physical or operational change to any equipment that would:
 - Change the representation of the facility in the application.
 - Alter the applicability of any state or federal air pollution rules or regulations.
 - Result in the violation of any terms or conditions of this permit.
 - Qualify as a modification under APC Regulation No. 9.

Such notification shall include:

- a. Information describing the nature of the change.
- b. Information describing the effect of the change on the emission of any air contaminant.

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- c. The scheduled completion date of the planned change,

Any such change shall be consistent with the appropriate regulation and have the prior approval of the Director.

- 6. The owner/operator shall notify the Office of Air Resources, in writing, of any noncompliance with the terms of this permit within 30 calendar days of becoming aware of such occurrence and supply the Director with the following information:
 - a. The name and location of the facility;
 - b. The subject source(s) that caused the noncompliance with the permit term;
 - c. The time and date of first observation of the incident of noncompliance;
 - d. The cause and expected duration of the incident of noncompliance;
 - e. The estimated rate of emissions (expressed in lbs/hr or lbs/day) during the incident and the operating data and calculations used in estimating the emission rate;
 - f. The proposed corrective actions and schedule to correct the conditions causing the incidence of noncompliance.
- 7. All records required as a condition of this approval must be made available to the Office of Air Resources or its representative upon request. These records must be maintained for a minimum of five years after the date of each record.

E. Other Permit Conditions

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- 1. To the extent consistent with the requirements of this approval and applicable Federal and State laws, the facility shall be designed, constructed and operated in accordance with the representation of the facility in the permit application dated 25 July 2012.
- 2. There shall be no bypassing of the air pollution control equipment at any time.
- 3. Employees of the Office of Air Resources and its authorized representatives shall be allowed to enter the facility at all times for the purpose of inspecting any air pollution source, investigating any condition it believes may be causing air pollution or examining any records required to be maintained by the Office of Air Resources.
- 4. At all times, including periods of startup, shutdown and malfunction, the permittee shall, to the extent practicable, maintain and operate the facility in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Office of Air Resources which may

include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the source.

5. The filter cartridges used in the dust collector shall be the Torit Ultra-Web filters or its equivalent in terms of filtration efficiency.

F. Malfunctions

1. A malfunction of any air pollution control system that would result in the exceedance of any emission limitation applicable to this facility will necessitate the shutdown of the process discharging to the dust collector. The process must remain shutdown until the malfunction has been identified and corrected.
2. The owner/operator may seek to establish that a malfunction of any air pollution control system that would result in noncompliance with any of the terms of this permit or any other applicable air pollution control rules and regulations was due to unavoidable increases in emissions attributable to the malfunction. To do so, the owner/operator must demonstrate to the Office of Air Resources that:
 - a. The malfunction was not attributable to improperly designed air pollution control equipment, lack of preventative maintenance, careless or improper operation, or operator error;
 - b. The malfunction was not part of a recurring pattern indicative of inadequate design, operation, or maintenance;
 - c. Repairs were performed in an expeditious fashion. Off-shift labor and overtime should be utilized, to the extent practicable, to ensure that such repairs were completed as expeditiously as practicable.
 - d. All possible steps were taken to minimize emissions during the period of time that the repairs were performed.
 - e. Emissions during the period of time that the repairs were performed will not:
 - (1) Cause an increase in the ground level ambient concentration at or beyond the property line in excess of that allowed by Air Pollution Control Regulation No. 22 and any Calculated Acceptable Ambient Levels; and
 - (2) Cause or contribute to air pollution in violation of any applicable state or national ambient air quality standard.
 - f. The reasons that it would be impossible or impractical to cease the source operation during said period.
 - g. The owner/operator's action in response to the excess emissions was documented by properly signed, contemporaneous operating logs or other

COPY

relevant evidence.

This demonstration must be provided to the Office of Air Resources, in writing, within two working days of the time when the malfunction occurred and contain a description of the malfunction, any steps taken to minimize emissions and corrective actions taken.

The owner/operator shall have the burden of proof in seeking to establish that noncompliance was due to unavoidable increases in emissions attributable to the malfunction.

COPY

-CERTIFIED-

March 27th, 2015

Mr. Gerald A. Smith III, President/Chief Operating Officer
Advanced Chemical Company
105 Bellows Street
Warwick, Rhode Island 02888

COPY

RE: Warwick Sewer Authority Industrial Pretreatment Program
Issuance of Industrial Wastewater Discharge Permit
Advanced Chemical Company - Permit # 107

Dear Mr. Smith,

Your application for an Industrial Wastewater Discharge Permit (IWDP) has been reviewed and processed in accordance with Regulation 54 of the Warwick Sewer Authority's Sewer Use Ordinance.

Review of the application indicates that **Advanced Chemical Company** is a Non-Categorical/Significant Industrial User based on the requirements of 40 CFR Part 403. By definition, a Non-Categorical/Significant Industrial User (SIU) is an Industrial User (IU) which meets one or more of the following criteria:

Applicable	Categorical/Significant Industrial User Criteria
No	Any User subject to Categorical Pretreatment Standards under 40 CFR
No	Any User discharging an average of 25,000 gallons per day or more of process wastewater to the Warwick Sewer Authority or contributing a process wastestream which makes up to five percent (5%) or more of the average dry weather hydraulic or organic capacity of the Treatment Facility
Yes	Any user that has a reasonable potential, in the opinion of the Authority, to adversely affect the operation of the Treatment Facility and/or to violate any Pretreatment standard(s) or requirement(s).

The enclosed **Permit # 107** covers the wastewater discharged from the facility located at **105 Bellows Street** into the Warwick Sewer Authority's sewer collection system. All discharges from this facility and actions and reports relating thereto shall be in accordance with the terms and conditions of this permit. Permits are site specific and are non-transferable.

By:


Betty Anne Rogers, Pretreatment Coordinator, Warwick Sewer Authority

Issued this 27th day of March 2015

**NON-CATEGORICAL/SIGNIFICANT INDUSTRIAL USER
ADVANCED CHEMICAL COMPANY
INDUSTRIAL WASTEWATER DISCHARGE PERMIT #107**

In accordance with the provisions of Regulation 54 of the Warwick Sewer Authority's Sewer Use Ordinance

**Advanced Chemical Company
105 Bellows Street
Warwick, Rhode Island 02888**

COPY

is hereby authorized to discharge industrial wastewater from the above identified facility into the Warwick Sewer Authority's sewer system in accordance with the conditions set forth in this permit. Authorized company representatives and responsible pretreatment operations personnel must read the conditions and requirements of this permit thoroughly. Questions regarding the conditions and requirements of this permit should be directed to the Office of Industrial Pretreatment at (401) 468-4726 or FAX inquiries to (401) 468-4799 or (401) 739-1414. Alternatively, questions may be emailed to the Pretreatment Coordinator, Ms. BettyAnne Rogers, at the following address: bettyanne.rogers@warwickri.com.

Process wastewater discharges from the Permittee must be consistent, at all times, with the pollutant load discharge limits, monitoring requirements and other conditions and requirements as set forth in this permit. Compliance with this permit does not relieve the Permittee of its obligation to comply with any or all applicable pretreatment regulations, standards or requirements under local, State, and Federal laws, including any such regulations, standards, requirements or laws that may become effective during the term of this permit.

Failure to comply with any of the conditions and requirements of this permit shall constitute a violation of the Warwick Sewer Authority's Sewer Use Ordinance and will subject the Permittee to violation notices and fines, up to \$25,000.00 per day per violation, as described in the Warwick Sewer Authority's Enforcement Response Plan. Willful and/or criminally negligent violations will be punishable by Warwick Sewer Authority, State and Federal Law.

Our records indicate the following individuals have been identified as authorized representatives for the wastewater discharge from your facility.

Authorized Representative	Title	Business Phone	Home Phone/Cell Phone	Email Address
Gerald A. Smith III	President & Chief Operating Officer	401-785-3434 Ext. 144	401-486-8799 (C)	Jerryiii@advchem.com
Charles J. Volpe	Environmental Manager	401-785-3434 Ext. 117	401-944-6078 (H) 401-486-8026 (C)	Charlie@advchem.com
Jeff Caleshu	QA Coordinator/ HR Administrator	401-785-3434 Ext. 130	860-376-3203 (H) 860-460-6767 (C)	Jcaleshu@advchem.com
Ryan Hargraves	Environmental Technician	401-785-3434 Ext. 112	860-319-3516 (C)	Ryanh@advchem.com

Changes in contact information for your company's authorized representatives must be reported to the Warwick Sewer Authority upon implementation using the **Designation of Authorized Agent Form** (available at www.warwickri.gov/wsa/pretreat/index.html).

This permit shall become effective on the 1st of April 2015 and shall expire at midnight on the 31st of May, 2018.

If the Permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a renewal permit in accordance with the requirements of Regulation 54 of the Warwick Sewer Authority's Sewer Use Ordinance, *a minimum of 90 days prior to the expiration date*.

No prior oral or written understanding shall be of any force or effect with respect to the matters covered under this permit. This permit shall not be modified or altered except in accordance with the rules and regulations of the Warwick Sewer Authority.

By: Patrick T. Doyle
Patrick T. Doyle, Superintendent Warwick Sewer Authority

By: Betty Anne Ross 3/27/15
Betty Anne Ross, Pretreatment Coordinator, Warwick Sewer Authority

Issued this 27th day of March 2015

COPY

PART I – EFFLUENT LIMITATIONS

- A. **Description of Outfalls:** During the period of April 1st, 2015 to May 31st, 2018, the Permittee is authorized to discharge process wastewater to the Warwick Sewer Authority's sewer system from the outfalls identified below. Process wastewater outfall images are provided at the end of this permit.

Outfall 001 Process Wastewater	Flow originates at the rear (north) side of the building, flowing through a sampling/inspection manhole located at the southwest corner of the property in the parking lot entrance - west invert.
Outfall 002 Sanitary Wastewater	Sanitary flow originates at the front (south) side of building, flowing through the sampling/inspection manhole located at southwest corner of the property in the parking lot entrance - south invert.

ADVANCED CHEMICAL

105 Bellows Street, Warwick, Rhode Island 02888

Permit Effective Dates: April 1, 2015 - May 31, 2018
 Non-Categorical Significant Industrial User
 Permit # 107

WARWICK SEWER AUTHORITY INDUSTRIAL PRETREATMENT PROGRAM
 SELF-MONITORING REQUIREMENTS

Pollutant - Parameter	Sample Type	WSA Daily Maximum Effluent Discharge Limits (mg/L)	Surcharge Limits (mg/L)	Monthly Monitoring Frequency												Sampling & Monitoring Location(s)		
				JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC			
Arsenic (As)	composite	0.10																
Beryllium (Be)	composite	0.003																
Cadmium (Cd)	composite	0.05																
Total Chromium (TCr)	composite	2.77																
Copper (Cu)	composite	0.70																
Lead (Pb)	composite	0.15																
Mercury (Hg)	composite	0.001																
Nickel (Ni)	composite	3.98																
Selenium (Se)	composite	0.2																
Silver (Ag)	composite	0.32																
Zinc (Zn)	composite	1.00																
Total Cyanide (TCN)	4 grabs	0.16																
Total Toxic Organics (TTO)	1 grab	2.13																
Carbonaceous Biochemical Oxygen Demand (CBOD)	composite	2,500	250															
Total Suspended Solids (TSS)	composite	1,000	250															
Oil & Grease (animal/vegetable origin)	4 grabs	300	100															
Oil & Grease (petroleum origin)	4 grabs	25																
Ammonia (NH ₃)	composite		35															
Total Phosphorus (TP)	composite		8															
Temperature	4 grabs	56°C or 150°F																
pH minimum - pH maximum	4 grabs	6.0 - 10.0 s.u.																
pH minimum - pH maximum	continuous	6.0 - 10.0 s.u.																
Gallons per Day Flow (GPD)	continuous	NA																

Description of Sampling & Monitoring Locations:

- 1 - Outfall 001 - Southwest Sampling Manhole
- 2 - pH Monitoring Equipment in Resin Room
- 3 - Flow Monitoring Equipment (Process Flow Only)

COPY



WARWICK SEWER AUTHORITY INDUSTRIAL PRETREATMENT PROGRAM
INDUSTRIAL/COMMERCIAL FACILITIES
WASTEWATER DISCHARGE PERMIT

PERMIT NUMBER: 702
INDUSTRIAL PRETREATMENT CATEGORY: 4A
SELF-MONITORING REQUIREMENTS: NO

THIS WASTEWATER DISCHARGE PERMIT IS SITE SPECIFIC AND NON-TRANSFERABLE. PERMIT NUMBER 702 IS ISSUED TO THE FOLLOWING FACILITY LOCATION:

ADVANCED CHEMICAL (2ND LOCATION)
131 BELLOWS ST
WARWICK, RI 02888
Plat/Lot 291-0069-0000

COPY

COMPANY REPRESENTATIVE/AUTHORIZED AGENT INFORMATION:

CHARLES J. VOLPE
ADVANCED CHEMICAL COMPANY
105 BELLOWS ST
WARWICK, RI 02888
401-785-3434 X117

In accordance with all terms and conditions of the Warwick Sewer Authority's Sewer Use Ordinance (SUO), Rules and Regulations, and any applicable provisions of Federal and State law or regulations, permission is hereby granted to **ADVANCED CHEMICAL (2ND LOCATION)** for the contribution of wastewater into the City of Warwick's Sewer System by either **direct discharge** from the location designated above (if sewer) or **indirect discharge** via septage hauler (if presently on a septic system).

This permit is granted in accordance with the Industrial Pretreatment-Wastewater Discharge Permit Application filed with the Warwick Sewer Authority's Office of Industrial Pretreatment and in conformity with plans, specifications and other data submitted to the Industrial Pretreatment Program in support of the aforementioned application. All materials are filed with, and considered part of, this permit together with the attached conditions and requirements, where applicable.

This permit is effective 1st day of June 2013
This permit is scheduled to expire 31st day of May 2018

Superintendent, Patrick T. Doyle

Pretreatment Coordinator, BettyAnne Rossi



WARWICK SEWER AUTHORITY INDUSTRIAL PRETREATMENT PROGRAM
INDUSTRIAL/COMMERCIAL FACILITIES
WASTEWATER DISCHARGE PERMIT

PERMIT NUMBER: 24
INDUSTRIAL PRETREATMENT CATEGORY: 4A
SELF-MONITORING REQUIREMENTS: NO

THIS WASTEWATER DISCHARGE PERMIT IS SITE SPECIFIC AND NON-TRANSFERABLE. PERMIT NUMBER 24 IS ISSUED TO THE FOLLOWING FACILITY LOCATION:

ADVANCED CHEMICAL (3RD LOCATION)
45 COMMERCE DR
WARWICK, RI 02886
Plat/Lot 312-0003-0000

COPY

COMPANY REPRESENTATIVE/AUTHORIZED AGENT INFORMATION:

CHARLES J. VOLPE
ADVANCED CHEMICAL COMPANY
105 BELLOWS ST
WARWICK, RI 02888
401-785-3434 X117

In accordance with all terms and conditions of the Warwick Sewer Authority's Sewer Use Ordinance (SUO), Rules and Regulations, and any applicable provisions of Federal and State law or regulations, permission is hereby granted to **ADVANCED CHEMICAL (3RD LOCATION)** for the contribution of wastewater into the City of Warwick's Sewer System by either **direct discharge** from the location designated above (if sewerred) or **indirect discharge** via septage hauler (if presently on a septic system).

This permit is granted in accordance with the Industrial Pretreatment-Wastewater Discharge Permit Application filed with the Warwick Sewer Authority's Office of Industrial Pretreatment and in conformity with plans, specifications and other data submitted to the Industrial Pretreatment Program in support of the aforementioned application. All materials are filed with, and considered part of, this permit together with the attached conditions and requirements, where applicable.

This permit is effective 1st day of June 2013
This permit is scheduled to expire 31st day of May 2018

Superintendent, Patrick T. Doyle

Pretreatment Coordinator, BettyAnne Rossi



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

May 7, 2014

ADVANCED CHEMICAL CO INC
105 BELLOWS ST.
WARWICK, RI 02888

**RE: Authorization for Storm Water Discharges Associated with Industrial Activity for
ADVANCED CHEMICAL CO INC
RIPDES Permit No. RIR50F009**

Dear Permittee:

As you are aware on 11/14/2013 you submitted a completed Notice of Intent (NOI) for authorization under the 2013 Multi-Sector General Permit (2013 MSGP). This letter serves as notice of your authorization to discharge storm water associated with industrial activity under the Rhode Island Pollutant Discharge Elimination System (RIPDES) 2013 MSGP. In compliance with the provisions of Chapter 46-12 of the Rhode Island General Laws, as amended, ADVANCED CHEMICAL CO INC is authorized to discharge Storm Water Associated with Industrial Activity from the above-mentioned facility to the Pawtuxet River. Coverage for the facility under the 2013 MSGP became effective on 11/14/2013 and the authorization to discharge shall expire at midnight, on August 14, 2018.

This authorization should be attached to your copy of the 2013 MSGP and be kept on-site as verification of authorization to discharge. All terms and conditions, outlined in the 2013 MSGP, must be met. Any permit non-compliance constitutes a violation of Chapter 46-12 of the Rhode Island General Laws of 1956, as amended, and is grounds for enforcement. For future references and inquiry, your RIPDES permit number is RIR50F009.

The issuance of this authorization does not relieve the permittee from its need to comply with any other applicable laws or regulations administered by the Department of Environmental Management or any other governmental entity.

If you have any questions regarding the 2013 MSGP, please contact Margarita Chatterton, of the RIPDES Program's permitting staff at 401-222-4700, extension 7605.

Sincerely,

Eric A. Beck, P.E.
Supervising Sanitary Engineer

COPY

BUREAU OF FIRE PREVENTION CITY OF WARWICK PERMIT

FOR KEEPING, STORAGE, USE, MANUFACTURE, HANDLING, TRANSPORTATION, OR OTHER DISPOSITION OF HIGHLY FLAMMABLE, COMBUSTIBLE, EXPLOSIVE OR HAZARDOUS MATERIALS, AS STATED BELOW:

DATE: FEBRUARY 20, 2013

TO WHOM IT MAY CONCERN:

BY VIRTUE OF THE PROVISIONS OF THE STATE FIRE SAFETY CODE AND/OR CITY OF WARWICK FIRE PREVENTION REGULATIONS OR ORDINANCES:

NAME AND ADDRESS	ADVANCED CHEMICAL COMPANY 105 BELLOWS STREET, WARWICK RI 02888
CONDUCTING A BUSINESS	PRECIOUS METAL RECLAMATION
LESS THAN 50 GALS OF SOLVENT AND LATEX PAINTS (100-200 F), LESS THAN 20 LBS OF ASSORTED SPRAY PAINTS, PRIMERS, HARDENERS, LUBRICATING OILS, HYDRAULIC OILS AND GREASES (73-200 F), 15 - 30 LB CYLINDERS OF PROPANE, 12 PORTABLE TORCHES (-156F), 4 ACETYLENE GAS CYLINDERS (-1F), 110 GALS OF SYNASOL SOLVENT, PM 200 PROOF (51F), 2 LITERS OF ACETONE (-1F), LESS THAN 10 GALS OF GASOLINE (-45F)	

THIS PERMIT IS ISSUED AND ACCEPTED ON CONDITION THAT ALL REGULATIONS NOW ADOPTED, OR THAT MAY HEREAFTER BE ADOPTED, SHALL BE COMPLIED WITH.

THIS PERMIT DOES NOT TAKE THE PLACE OF ANY LICENSE REQUIRED BY LAW AND IS NOT TRANSFERABLE ANY CHANGE IN THE USE OR OCCUPANCY OF PREMISES SHALL REQUIRE A NEW PERMIT

COPY

Terrence J. Gaskin
 BOARD OF PUBLIC SAFETY
 CHIEF OF DEPARTMENT

John J. Whawell
 FIRE MARSHAL, BUREAU OF FIRE PREVENTION

BUREAU OF FIRE PREVENTION CITY OF WARWICK PERMIT

FOR KEEPING, STORAGE, USE, MANUFACTURE, HANDLING, TRANSPORTATION, OR OTHER DISPOSITION OF HIGHLY
FLAMMABLE, COMBUSTIBLE, EXPLOSIVE OR HAZARDOUS MATERIALS, AS STATED BELOW.

DATE: FEBRUARY 20, 2013

TO WHOM IT MAY CONCERN:

BY VIRTUE OF THE PROVISIONS OF THE STATE FIRE SAFETY CODE AND/OR CITY OF WARWICK FIRE PREVENTION
REGULATIONS OR ORDINANCES:

NAME AND ADDRESS	ADVANCED CHEMICAL COMPANY 131 BELLOWS STREET, WARWICK RI 02888
CONDUCTING A BUSINESS	PRECIOUS METAL RECLAMATION
LESS THAN 30 GALS OF ASSORTED SOLVENT BASED PAINTS (100-200F), LESS THAN 20LB OF ASSORTED SPRAY PAINTS, ADHESIVES, OILS, GREASES (73-200F), 2 - 30 LB CYLINDERS OF PROPANE, 12 - 16OZ PORTABLE TORCHES (-156F) 4 CYLINDERS OF ACETYLENE GAS (-1F), LESS THAN 1 GAL OF SYNASOL SOLVENT, PM 200 PROOF (51 F), LESS THAN 2 LITERS OF ACETONE (-1F)	

THIS PERMIT IS ISSUED AND ACCEPTED ON CONDITION THAT ALL REGULATIONS NOW ADOPTED, OR THAT MAY HEREAFTER
BE ADOPTED, SHALL BE COMPLIED WITH.

THIS PERMIT DOES NOT TAKE THE PLACE OF ANY LICENSE
REQUIRED BY LAW AND IS NOT TRANSFERABLE. ANY CHANGE
IN THE USE OR OCCUPANCY OF PREMISES SHALL REQUIRE A NEW
PERMIT.

Joseph A. M...
 BOARD OF PUBLIC SAFETY
 CHIEF OF DEPARTMENT
 FIRE MARSHAL, BUREAU OF FIRE PREVENTION

COPY

BUREAU OF FIRE PREVENTION CITY OF WARWICK PERMIT

FOR KEEPING, STORAGE, USE, MANUFACTURE, HANDLING, TRANSPORTATION, OR OTHER DISPOSITION OF HIGHLY FLAMMABLE, COMBUSTIBLE, EXPLOSIVE OR HAZARDOUS MATERIALS, AS STATED BELOW.

DATE: FEBRUARY 19, 2013

TO WHOM IT MAY CONCERN:

BY VIRTUE OF THE PROVISIONS OF THE STATE FIRE SAFETY CODE AND/OR CITY OF WARWICK FIRE PREVENTION REGULATIONS OR ORDINANCES:

NAME AND ADDRESS	ADVANCED CHEMICAL COMPANY 45 COMMERCE DRIVE, SUITE B, WARWICK, RI 02886
CONDUCTING A BUSINESS	MATERIAL RE-SIZING (SHREDDING)
LESS THAN 10 GALLONS OF ASSORTED SOLVENT BASED PAINTS (000-200 DEGREES F), LESS THAN 20 POUND CONTAINERS OF ASSORTED SPRAY PAINTS, ADHESIVES, LUBRICATING OILS AND GREASES (75-200 F, (6) THIRTY POUND CYLINDERS OF PROPANE (-156 DEGREE F)	

THIS PERMIT IS ISSUED AND ACCEPTED ON CONDITION THAT ALL REGULATIONS NOW ADOPTED, OR THAT MAY HEREAFTER BE ADOPTED, SHALL BE COMPLIED WITH.

THIS PERMIT DOES NOT TAKE THE PLACE OF ANY LICENSE REQUIRED BY LAW AND IS NOT TRANSFERABLE. ANY CHANGE IN THE USE OR OCCUPANCY OF PREMISES SHALL REQUIRE A NEW PERMIT.

[Signature]
 BOARD OF PUBLIC SAFETY

[Signature]
 CHIEF OF DEPARTMENT

FIRE MARSHAL, BUREAU OF FIRE PREVENTION

COPY



United States Department of State

*Bureau of Political-Military Affairs
Directorate of Defense Trade Controls
Washington, D.C. 20522-0112*

July 12, 2016

Gerald A. Smith III, President
Advanced Chemical Company
131 Bellows St.
Warwick, Ri 02888
JCALESHU@ADVCHEM.COM

COPY

REGISTRANT CODE: M30798
EXPIRATION DATE: 07/31/2017

Reference: Manufacturer Registration Statement and Fee Submission

Dear Mr. Smith:

The Office of Defense Trade Controls Compliance received your registration statement and fee to register as a manufacturer. We have reviewed your registration statement and your registration code is M30798, which expires on 07/31/2017.

Any person who engages in the United States in the business of either manufacturing or exporting defense articles or furnishing defense services is required to register and keep that registration current with this office pursuant to the Arms Export Control Act (AECA) and the International Traffic in Arms Regulations (ITAR Part 122). Registration serves as a precondition to submitting an application for an export license or other approval from the Directorate of Defense Trade Controls (DDTC), or to use export exemptions. This registration does not satisfy the requirements for registering as a broker pursuant to ITAR Part 129.

As you are the senior officer empowered to sign the registration statement, we ask you to maintain records consistent with ITAR Section 122.5 regarding: 1) The key senior officer listed on the registration who will oversee the compliance program and be responsible for designating the direct employees who will serve as "empowered officials" at their place of employment, and 2) A list of qualified, direct employees who will serve as "empowered officials" by name, position, business unit, phone and fax numbers and email addresses. Please note that third parties (individuals who are not direct employees, such as consultants, subcontractors or outside counsel, for example) cannot serve as "empowered officials."

ITAR Section 122.5 requires you to maintain records concerning your registration and the manufacture, acquisition and disposition of defense articles; the provision of defense services; and information on political contributions, fees, or commissions furnished or obtained, as required by ITAR Part 130. Records maintained shall be available at all times for inspection and copying by this office or by Customs officials. To maintain such records, managers,

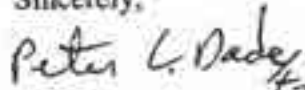
supervisors and employees need appropriate training on AECA and ITAR requirements and must understand the individual and organizational ramifications of failure to comply. Ramifications may include shipment delay and/or shipment seizure by Customs and Border Protection, loss of export privileges, or criminal charges.

You may refer to the DDTC website for a Compliance Guide at <http://www.pmdtcc.state.gov/> and then click on the Compliance tab. The DDTC website also includes a copy of the ITAR, explanations of export licensing procedures, how to submit a license application, country sanctions, individuals/companies debarred by the Department of State, and other export matters. The website also includes procedures for requesting a commodity jurisdiction determination (ITAR Section 120.4) should you have questions on whether an article, services, or technical data is covered by the ITAR Part 121 (U.S. Munitions List).

Please include your registration code and the following statement on all registration correspondence to this office: "Under penalty according to federal law (22 CFR 127.2; 22 USC 2778; 18 USC 1001) I, [insert your name], as authorized by [name of company, if applicable] warrant the truth of the statements made herein." We recommend submitting for registration renewal well in advance to ensure this office receives the request up to 45 day before registration expiration. Your registration must be received at least 30 days before the expiration date. Registration must be current to apply for export licenses or other approvals, or to use export exemptions. Your registration is not current, for example, if you have not notified this office of any material change in the information contained in your Registration Statement (ITAR Section 122.4).

If you have any questions regarding registration, please contact us at (202) 663-1282 or DDTCResponseTeam@state.gov.

Sincerely,



Daniel Cook

Chief, Compliance, Registration & Enforcement

COPY



June 8, 2016

Mr. John Antonacci
Advanced Chemical Company
105 Bellows St.
Warwick RI, 02888 USA
jantonacci@advchem.com

Dear Mr. Antonacci,

Thank you for your participation in the Conflict-Free Sourcing Initiative's (CFSI) Conflict-Free Smelter Program (CFSP).

The CFSP's Audit Review Committee (ARC) has reviewed the results of Advanced Chemical Company's CFSP Supply Chain Transparency Smelter Audit for Gold, conducted at the following location on the following dates:

Advanced Chemical Company
105 Bellows St.
Warwick RI, 02888 USA
April 6-7, 2016

COPY

Based on such review, the ARC concludes that Advanced Chemical Company is compliant with the CFSP Gold Protocol. The review covers only the facility listed above and expires one year from the date of the assessment.

Thank you for participating in the Conflict-Free Smelter Program.

Sincerely,

CFSI Conflict-Free Smelter Program Audit Review Committee



Conflict Metal Policy

Advanced Chemical Company is aware of the Dodd-Frank Wall Street Regulation and Consumer Protection Act in regards to "Conflict Metals".

Currently gold is the only mineral on the list of "Conflict Metals" that is incorporated into our products and chemistries. Advanced Chemical Company avoids minerals (specifically gold) that either directly finance, indirectly finance or benefit illegally armed groups from conflict-affected regions. To that end, Advanced Chemical Company does not purchase gold for use in our products or chemistries from the Democratic Republic of the Congo or any of its adjoining countries on the continent of Africa (Rwanda, Burundi, Uganda, Sudan, Central African Republic, Congo, Angola, Zambia & Tanzania).

Advanced Chemical Company is committed to environmental and social responsibility. We have implemented a program monitoring our direct and indirect supply chains, similar to our Anti-Money Laundering Compliance Program which is compliant with the Patriot Act.

This commitment to product excellence and our continued due diligence will help avoid procurement of "Conflict Metals." If you have any questions please do not hesitate to contact us.

Sincerely,

John Antonacci
Chief Marketing Officer

COPY



U.S. Department
of
Transportation
**Federal Motor
Carrier Safety
Administration**

1200 New Jersey Ave., S.E.
Washington, DC 20590
July 2, 2008

In reply refer to:
Your USDOT No.: 375634
Review No.: 442942/CR

CHARLES J. VOLPE
ENVIRONMENTAL MANAGER
ADVANCED CHEMICAL CO
105 BELLOWS ST
WARWICK, RI 02889-1503

COPY

Dear CHARLES J. VOLPE:

The motor carrier safety rating for your company is:

SATISFACTORY

This SATISFACTORY rating is the result of a review and evaluation of your safety fitness completed on June 25, 2008. A SATISFACTORY rating indicates that your company has adequate safety management controls in place to meet the safety fitness standard prescribed in 49 C.F.R. 395.5.

Please assure yourself that any specific deficiencies identified in the review report have been corrected. We appreciate your efforts toward promoting motor carrier safety throughout your company. If you have questions or require further information, please contact:

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL MOTOR CARRIER SAFETY ADMINISTRATION
20 RISSO AVENUE, SUITE 2
EAST PROVIDENCE, RI 02914
Telephone No.: 401-431-6030

William A. Quade
Associate Administrator for Enforcement
and Program Delivery

UNITED STATES OF AMERICA
DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION



**HAZARDOUS MATERIALS
CERTIFICATE OF REGISTRATION
FOR REGISTRATION YEAR(S) 2015-2018**

Registrant: ADVANCED CHEMICAL COMPANY
Attn: CHARLES J VOLPE
105 BELLOWS STREET
WARWICK, RI 02888

This certifies that the registrant is registered with the U.S. Department of Transportation as required by 49 CFR Part 107, Subpart G.

This certificate is issued under the authority of 49 U.S.C. 5108. It is unlawful to alter or falsify this document.

Reg. No: 060215 555 004XZ Issued: 06/02/2015 Expires: 06/30/2018

HM Company ID: 017760

Record Keeping Requirements for the Registration Program

The following must be maintained at the principal place of business for a period of three years from the date of issuance of this Certificate of Registration:

- (1) A copy of the registration statement filed with PHMSA; and
- (2) This Certificate of Registration.

Each person subject to the registration requirement must furnish that person's Certificate of Registration (or a copy) and all other records and information pertaining to the information contained in the registration statement to an authorized representative or special agent of the U. S. Department of Transportation upon request.

Each motor carrier (private or for-hire) and each vessel operator subject to the registration requirement must keep a copy of the current Certificate of Registration or another document bearing the registration number identified as the "U.S. DOT Hazmat Reg. No." in each truck and truck tractor or vessel (trailers and semi-trailers not included) used to transport hazardous materials subject to the registration requirement. The Certificate of Registration or document bearing the registration number must be made available, upon request, to enforcement personnel.

For information, contact the Hazardous Materials Registration Manager, PHH-52, Pipeline and Hazardous Materials Safety Administration, U.S. Department of Transportation, 1200 New Jersey Avenue, SE, Washington, DC 20590, telephone (202) 366-4109.

COPY



Bureau of Materials Management and Compliance Assurance
Waste Engineering and Enforcement Division

HAZARDOUS WASTE
TRANSPORTER PERMIT

COPY

CT-HW-383

PERMITTEE NAME	PERMITTEE ADDRESS	TELEPHONE NUMBER
Advanced Chemical Company	105 Bellows Street Warwick, RI 02888	(401) 785-3434
EPA ID NUMBER	EFFECTIVE DATE	EXPIRATION DATE
RID059735761	March 7, 2013	June 30, 2017

A. Authorized Waste Types:

CONNECTICUT REGULATED WASTE: Waste Chemical Liquids
HAZARDOUS WASTE (EPA WASTE NO. AS PER 40 CFR 261): All Types of Hazardous Waste as per 40 CFR 261

B. Vehicles Permitted to Transport Waste:

The Permittee is authorized to use only those vehicles registered, as indicated on "Attachment B: Vehicle List," of The Connecticut Permit Application For Waste Transportation (Application No. 201301098). Please refer to Section E.1. for the procedures for registering additional vehicles with the DEEP.

C. Conditions of this Permit:

This Permit incorporates by reference The Connecticut Permit Application For Waste Transportation (Application No. 201301098) completed by the Permittee and received by the Bureau of Materials Management and Compliance Assurance on February 27, 2013.

This permit does not authorize the transfer of hazardous waste from one vehicle to another or from one mode of transportation to another.

1. The Permittee shall ensure that each driver employed is completely familiar with the terms and conditions of this permit prior to transporting waste in or through Connecticut. A copy of this permit shall accompany each vehicle identified in this permit whenever it is being used to transport waste authorized by this permit.
2. The transporter permit number shall be displayed on the sides and rear of each vehicle identified in this permit in letters and numbers of contrasting color and at least four inches (4") high.
3. All wastes authorized to be transported by this permit shall be transported in compliance with all applicable provisions of Title 49 of the Code of Federal Regulations.
4. Transporters who provide a pre-printed manifest to a generator/shipper/offerox of hazardous waste shall ensure that all information pre-printed is correct and clearly legible on all copies. This includes, but is not limited to: US EPA Generator ID Number, Generator Name and Mailing Address, Generator's Site Address; Emergency Response Phone; Transporter(s) US EPA ID Number and Company Name; Designated Facility US EPA ID Number, Name and Site Address; all waste information (Items 9 - 13 and item 19); Alternate facility US EPA ID Number, Name and Site Address if applicable.

Manifest forms (EPA forms 8700-22 and 8700-22a) are designed for use with a 12 pitch font. Pre-printed manifests using smaller font may be rejected by the Permittee as not fulfilling the legal notification requirement. Pre-printed manifests should be inspected (especially the last copy - page 6) before the driver goes out to pick up the waste shipment to ensure legibility and correctness. Equipment used to print manifests should be maintained regularly and adjusted/serviced as needed.

- COPY
5. The Permittee shall not store, transfer, treat, discharge, dispose or otherwise manage waste at any site in Connecticut unless such site has written approval from the Commissioner for such activity.
 6. The Permittee shall maintain a record of all waste shipments rejected at the designated treatment, storage, or disposal facility for a minimum of three years from the date of such rejection. Such records shall include the date of rejection, the name and address of the generator(s) making up the shipment, a description of the waste rejected, the reason for the rejection and a description of the subsequent disposition of the rejected waste.
 7. The Permittee shall retain documents ensuring that all drivers transporting hazardous waste are properly trained for the emergency response actions they have been delegated to engage in. Such training shall include, but is not limited to the training elements required pursuant to RCSA Section 22a-449(c)-103(d). Copies of the driver training documents shall be submitted to the DEEP upon request.
 8. The Permittee shall ensure that all drivers engaged in the transportation of wastes which are hazardous materials as defined in Title 49 of the Code of Federal Regulations ("CFR") 171.8 are provided with, at a minimum, the training required pursuant to 49 CFR 172.704 and 177.816. Each vehicle identified in this permit shall be equipped, at a minimum, with the emergency equipment required pursuant to 49 CFR Part 393, Subpart H.

9. The Permittee shall ensure that employees engaged in emergency response as defined by 29 CFR subparagraph 1910.12(a)(3) are in compliance with all applicable requirements of the regulations developed by the Occupational Safety and Health Administration cited in 29 CFR.
10. The Permittee shall provide and maintain the required emergency information prescribed in 49 CFR 172, Subpart G - Emergency Response Information. When a package or container leaks in the course of transportation the Permittee shall ensure that, at a minimum, the actions required pursuant to 49 CFR 177.843 and 177.854 are complied with as applicable.

D. Reporting and Inspection Requirements:

1. Monthly Report Forms for each calendar month of the permit period shall be filed with the Director of the Bureau of Materials Management and Compliance Assurance/Waste Engineering and Enforcement Division of the Connecticut Department of Energy and Environmental Protection (DEEP) on or before the 10th day of the following month. Monthly Reports shall specify:
 - a. all Connecticut Regulated Waste and/or unmanifested Hazardous Waste transported; or
 - b. all Hazardous Waste transported was manifested; or
 - c. that no waste was transported.
2. By March 1 of each year an original certificate of insurance showing policy renewal shall be submitted to the DEEP.
3. The Permittee shall ensure that periodic inspections are conducted on each vehicle identified in this permit in accordance with 49 CFR 396.17. Copies of the inspection reports shall be submitted to the DEEP upon request. For Permittees with cargo tank vehicles registered in Connecticut, the Permittee shall have

each cargo tank identified in this permit inspected annually in accordance with the requirements of the Connecticut General Statutes Sections 29-322, 29-332, and 29-339, as applicable, and shall keep the issued inspection certificates with the certificate of registration for such vehicles at all times. Copies of the inspection certificates shall be submitted to the DEEP upon request.

4. The Permittee shall allow the DEEP to conduct periodic inspections to ensure permit compliance. These may include but not be limited to investigation of records, inspection and sampling of facilities and vehicles, photographs (including aerial), or other means deemed necessary for documentation of the inspection.
5. In the event of spillage or uncontrolled discharge while collecting, transferring and/or transporting any waste in or through the State of Connecticut, the DEEP Emergency Response and Spill Prevention Division shall be notified immediately by telephoning (860) 424-3338 or (860) 424-3333. In addition, the Permittee shall report Hazardous materials incidents in accordance with 49 CFR 171.15 and/or 171.16 as applicable.
6. Permittees transporting hazardous material as defined in 49 CFR 171.8 shall develop and adhere to a security plan for hazardous materials in conformance with the requirements of 49 CFR Part 172, Subpart I (Safety and Security Plans) as applicable.

E. Vehicle Registration and Waste Modifications:

1. The Permittee shall only transport authorized waste types using vehicles registered with the DEEP. Vehicles that need to be added to the permit shall be identified on a Transporter Permit Vehicle Registration Form(s) and submitted to the DEEP before using such vehicle(s). The effective date of the registration will be noted by DEEP on the registration form.

2. This permit may be modified to include additional waste types. The Permittee must submit a properly completed Application for a Waste Type Modification and the required fee to the address listed on the application.

F. Special Requirements for Permittees who act as Brokers:

1. Permittees who act as brokers and include independent owner/operators on their permit shall be responsible for ensuring:
 - a. that these owner/operators are in compliance with permit conditions;
 - b. that all vehicles are in compliance with all state and federal regulations;
 - c. that all drivers have the proper emergency response training;
 - d. that all drivers engaged in the transportation of wastes which are hazardous materials are in compliance with and familiar with all applicable requirements of Title 49 of the Code of Federal Regulations; and
 - e. that these owner/operators have the required minimum levels of liability insurance.

G. General Requirements:

1. The Commissioner may for any reason provided by law revoke or suspend this permit.
2. Violation of any provisions of this permit may subject the Permittee to civil and/or criminal penalties as provided by Section 22a-6(b), 22a-131, 22a-131a and 22a-438 of the Connecticut General Statutes.

CT-HW-383

In compliance with all applicable provisions of the Connecticut Hazardous Waste Management Regulations and Section 22a-454 of the Connecticut General Statutes, you are hereby authorized to transport the waste types specified in this permit, only on the vehicles listed (see page 1).



Robert C. Isner, Director
Waste Engineering and Enforcement Division
Bureau of Materials Management and Compliance Assurance
Department of Energy and Environmental Protection

3-7-2013

Date

COPY

Attachment B: Vehicle List

Applicant Name: **Advanced Chemical Company**
 (as indicated on the Application Form)

Complete the table by listing all vehicles (tractors and trailers) intended to be used for the transportation of waste in or through the State of Connecticut.

Year	Make	Type	Color(s)	State of Reg. & License Plate Number	Capacity	Address	Owner	Vehicle ID Number	* Dedicated Vehicle (yes or no)
2006	Freight Liner	Box Trailer	Gold cab Blk Box	RI 6557Z	26,000 p	105 Bellow's Street Marwick, RI 02888	Advanced Chemical Company	** see below	yes
**	1 P V A	C W D C	6 6 B W 1	1 0 9 0					

* Applies to waste carrying portion of the vehicle only. If you indicate no in this column, attach a separate sheet identifying the materials transported in that particular vehicle, and identify the vehicle by listing the state the vehicle is registered in and the vehicle license plate number.

Check here if additional sheets are necessary, and label and attach them to this sheet.

ACORD

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

5/20/2016

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.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must 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).

PRODUCER Starkweather & Shepley PO Box 549 Providence, RI 02901-0549 401 435-3600	CONTACT NAME: Vicki Signore	PHONE (A/C No, Ext): 401 435-3600	FAX (A/C No): 401 431-9632
	E-MAIL ADDRESS: vsignore@starshep.com		
INSURED Advanced Chemical Company 105 Bellows Street Warwick, RI 02888	INSURER(S) AFFORDING COVERAGE		NAIC #
	INSURER A: Nautilus Insurance Company		24017
	INSURER B: Beacon Mutual Ins Co		15792
	INSURER C: Lloyd's of London		25224
	INSURER D: Great Divide Insurance Company		
	INSURER E: INSURER F:		

COVERAGES CERTIFICATE NUMBER: REVISION NUMBER:

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.

INSTR	TYPE OF INSURANCE	ADDITIONAL	POLICY NUMBER	POLICY EFF	POLICY EXP	LIMITS
LYR		INSR. WVD		(MM/DD/YYYY)	(MM/DD/YYYY)	
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR		GLP2008005	03/01/2016	03/01/2017	EACH OCCURRENCE \pm 1,000,000 DAMAGE TO RENTED PREMISES (EA accident) \pm 300,000 MED EXP (Any one person) \pm 10,000 PERSONAL & ADJ INJURY \pm 1,000,000 GENERAL AGGREGATE \pm 2,000,000 PRODUCTS - COMP/OP AGG \pm 2,000,000 \$
D	AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO ALL OWNED AUTOS <input checked="" type="checkbox"/> Hired Autos <input type="checkbox"/> SCHEDULED AUTOS NON-OWNED AUTOS		BAP2008647-13	05/19/2016	05/19/2017	COMBINED SINGLE LIMIT (EA accident) \pm 1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
A	UMBRELLA LIAB <input checked="" type="checkbox"/> EXCESS LIAB DED. RETENTION		FFX2008006	03/01/2016	03/01/2017	EACH OCCURRENCE \pm 4,000,000 AGGREGATE \pm 4,000,000 \$
B	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE/OFFICER/MEMBER EXCLUDED? (Mandatory in RI) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N N	5257	01/06/2016	01/06/2017	<input checked="" type="checkbox"/> PER STATUTE E.L. EACH ACCIDENT \pm 1,000,000 E.L. DISEASE - EA EMPLOYEE \pm 1,000,000 E.L. DISEASE - POLICY LIMIT \pm 1,000,000
A	Pollution		SSP2008002	03/01/2016	03/01/2017	See Limits Below
C	Prop In Transit		JB165653	03/01/2016	02/28/2017	See Limits Below

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

Pollution Liability: \$1,000,000 Each Pollution Condition; \$2,000,000 General Aggregate

Property in Transit: \$5,000,000 Special Form, \$25,000 Deductible

MCS-90 Included

COPY

CERTIFICATE HOLDER State of Connecticut Department of Environmental Protection Bureau of Waste Management 79 Elm Street Hartford, CT 06106	CANCELLATION 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: <i>Vicki Signore</i>
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Commonwealth of Massachusetts
 Executive Office of Environmental Affairs
 Department of Environmental Protection
 Bureau of Waste Prevention - Business Compliance Division

Precious Metals Transporter License
REGULATED RECYCLABLE MATERIAL (CLASS B (4))

Important: When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.




1. Name of Licensee/Permittee:
 Advanced Chemical Company
 Name

2. Office Address:
 105 Bellows Street
 Street Address
 Warwick
 City
 RI
 2888
 State Zip Code

3. Mailing address, if different:
 Same
 Street/PO Box: City
 State Zip Code

4. Contact person:
 Charles J. Volpe
 Name 401 785.3434, ext. 117
 Telephone #

5. EPA Identification number and address:
 RID059735761
 EPA ID Number 105 Bellows Street, Warwick, RI 02888
 Address - On EPA I.D. Number Form

6. Signature

 Signature 10/14/15
 Charles J. Volpe
 Name Environmental Manager
 Official Title

COPY

This license is valid until the effective date and unless signed by the Applicant and the Director of the Business Compliance Division (Bureau of Waste Prevention, Massachusetts Department of Environmental Protection).

Do not write below this line - for DEP use only

The Department hereby grants the above-named company a license to transport class B(4) regulated recyclable material pursuant to M.G.L. Chapter 21C and Massachusetts Hazardous Waste Regulations 310 CMR 30.000. The license becomes effective 21 days after the date of signature on the license by the Director of the Business Compliance Division, unless during that time an appeal has been received by the Department. In that case, the license is not in effect until, and if, the appeal is resolved in favor of the license applicant.

This license authorizes only the named licensee to engage in the transportation of class B (4) regulated recyclable material listed or described in 310 CMR 30.213(4). The licensee is authorized to transport regulated recyclable materials pursuant to M.G.L. Chapter 21C and 310 CMR 30.200, including 310 CMR 30.270 - "Requirements Governing Class B (4) Regulated Recyclable Material". This license is not transferable. This license does not grant any rights not otherwise granted by federal, state, or local statutes, ordinances, or regulations. The licensee shall comply at all times with all state and federal regulations and statutes applicable to the transportation of hazardous waste.


 Director, Business Compliance Division
 11/30/2015
 Effective Date

11/09/2015
 Date
 11/30/2020
 Expiration Date

Massachusetts License Number
 pmb-010
 Massachusetts Precious Metals Transporter License Number



Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

COPY

APPEAL RIGHTS AND TIME LIMITS

If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty one (21) days of the date this license was issued.

CONTENTS OF HEARING REQUEST

Pursuant to 310 CMR 1.01(6)(b), the request must state specifically, clearly and concisely the facts which are the grounds for the request, and the relief sought. Additionally, the request must state why the license decision is not consistent with applicable laws and regulations. The request must also include a copy of the document being appealed.

FILING FEE AND ADDRESS

The hearing request, along with a valid check payable to the Commonwealth of Massachusetts in the amount of \$100, must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA, 02211

The request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below.

EXCEPTIONS

The filing fee is not required if the appellant is a city or town (or municipal agency), county, district of the Commonwealth of Massachusetts, or municipal housing authority.

WAIVER

The Department may waive the adjudicatory hearing filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

ACORD

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)
5/20/2016

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PRODUCER Starkweather & Shepley PO Box 549 Providence, RI 02901-0549 401 435-3600	CONTACT NAME: Vicki Signore PHONE (A/C, No, Ext): 401 435-3600 FAX (A/C, No): 401 431-9632 E-MAIL ADDRESS: vsignore@starshep.com																				
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YEAR	TYPE OF INSURANCE	ADDL SUBR INSR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PROJ-ECT <input type="checkbox"/> LOC <input type="checkbox"/> OTHER		GLP2008005	03/01/2016	03/01/2017	EACH OCCURRENCE ±1,000,000 DAMAGE TO RENTED PREMISES (Per occurrence) ±300,000 MED EXP (Any one person) ±10,000 PERSONAL & ADV INJURY ±1,000,000 GENERAL AGGREGATE ±2,000,000 PRODUCTS - COMP/OP AGG ±2,000,000 \$
D	AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO <input checked="" type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS <input checked="" type="checkbox"/> NON-OWNED AUTOS		BAP2008647-13	05/19/2016	05/19/2017	COMBINED SINGLE LIMIT (Per accident) ±1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
A	<input type="checkbox"/> UMBRELLA LIAB <input type="checkbox"/> OCCUR <input checked="" type="checkbox"/> EXCESS LIAB <input checked="" type="checkbox"/> CLAIMS-MADE DED RETENTION \$		FFX2008006	03/01/2016	03/01/2017	EACH OCCURRENCE ±4,000,000 AGGREGATE ±4,000,000 \$
B	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in MA) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N N / A	5257	01/06/2016	01/06/2017	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> BOTH E.L. EACH ACCIDENT ±1,000,000 E.L. DISEASE - EA EMPLOYEE ±1,000,000 E.L. DISEASE - POLICY LIMIT ±1,000,000
A	Pollution		SSP2008002	03/01/2016	03/01/2017	See Limits Below
C	Prop In Transit		JB165653	03/01/2016	02/28/2017	See Limits Below

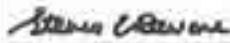
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Pollution Liability: \$1,000,000 Each Pollution Condition; \$2,000,000 General Aggregate

Property in Transit: \$5,000,000 Special Form, \$25,000 Deductible

MCS-90 Included

COPY

CERTIFICATE HOLDER Commonwealth of Massachusetts Dept of Environmental Protection Hazardous Waste Transporter Program 1 Winter Street Boston, MA 02108	CANCELLATION 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 
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The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

June 6, 2016

CHARLES J VOLPE
ADVANCED CHEMICAL COMPANY
105 BELLOWS STREET
WARWICK RI 02888

Subject: Hazardous Waste Transporter Registration Renewal Confirmation

Dear CHARLES J VOLPE:

Your hazardous waste transporter renewal registration application has been received and accepted by the Department of Environmental Services (DES).

This letter shall be proof of registration. A copy of this letter must be carried in each vehicle used to transport federal and state listed or characteristic hazardous wastes, including used oil, in and through the State of New Hampshire. Hazardous waste transporters and their employees shall display a copy of this letter upon request of any law enforcement officer or agent of the Waste Management Division.

Registration number TNH-0094 is assigned to your company. This number should be referenced in all correspondence with this office. Display this number on all vehicles used to transport hazardous wastes in and through New Hampshire in accordance with Env-Wm 603.06.

Please refer to the transporter regulations at http://des.nh.gov/orcb/transporters_program.htm. By registering to transport hazardous waste in New Hampshire the registered transporter has agreed to comply with the regulations as they pertain to the transportation of hazardous waste in New Hampshire. Failure to comply with the regulations may result in enforcement action by DES.

Transporters shall maintain financial responsibility as required under 49 CFR section 387.9. Discontinuance of this responsibility by the transporter may result in revocation of your company's eligibility to transport hazardous waste in New Hampshire.

This registration shall expire on June 30, 2017. Forms for renewal of your registration will be supplied by the Waste Management Division. Completed renewal registration forms shall be returned to the Waste Management Division by May 15.

If you need further information or have any questions on transportation registration, please contact me at 603-271-3203.

Sincerely,

Maria Michel, Supervisor
Reporting and Information Mgmt
Section

Tel: (603) 271-3203

Fax: (603) 271-2181

Email: maria.michel@des.nh.gov DES Web site: www.des.nh.gov

P.O. Box 3900, 29 Hazen Drive, Concord, New Hampshire 03302-0095

Telephone: (603) 271-2921 • Fax: (603) 271-2181 • TDD Access: Relay NH 1-800-735-2964

COPY

ACORD

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

5/20/2016

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.

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PRODUCER Starkweather & Shepley PO Box 549 Providence, RI 02901-0549 401 435-3600	CONTACT NAME Vicki Signore PHONE (A.C. No. Ext.) 401 435-3600 FAX (A.C. No.) 401 431-9632 E-MAIL ADDRESS vsignore@starshep.com
	INSURER(S) AFFORDING COVERAGE INSURER A: Nautilus Insurance Company INSURER B: Beacon Mutual Ins Co INSURER C: Lloyd's of London INSURER D: Great Divide Insurance Company INSURER E: INSURER F:
INSURED Advanced Chemical Company 105 Bellows Street Warwick, RI 02888	

COVERAGES **CERTIFICATE NUMBER:** **REVISION NUMBER:**

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INSR (YR)	TYPE OF INSURANCE	ADDENDUM (ISR, JWD)	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR GENL. AGGREGATE LIMIT APPLIES FOR: <input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PROJ. <input type="checkbox"/> LOC. <input type="checkbox"/> OTHER		GLP2008005	03/01/2016	03/01/2017	EACH OCCURRENCE ±1,000,000 DAMAGE TO RENTED PREMISES (Per occurrence) ±300,000 MED EXP (Any one person) ±10,000 PERSONAL & ADV INJURY ±1,000,000 GENERAL AGGREGATE ±2,000,000 PRODUCTS - COMPROP AGG ±2,000,000 3
D	<input checked="" type="checkbox"/> AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO: ALL OWNED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS <input checked="" type="checkbox"/> SCHEDULED AUTOS NON-OWNED AUTOS		BAP2008647-13	05/19/2016	05/19/2017	COMBINED SINGLE LIMIT (Per occurrence) ±1,000,000 BODILY INJURY (Per person) 3 BODILY INJURY (Per accident) 3 PROPERTY DAMAGE (Per accident) 3 3
A	<input checked="" type="checkbox"/> UMBRELLA LIAB <input type="checkbox"/> OCCUR <input checked="" type="checkbox"/> EXCESS LIAB <input checked="" type="checkbox"/> CLAIMS-MADE DED RETENTION \$		FFX2008006	03/01/2016	03/01/2017	EACH OCCURRENCE ±4,000,000 AGGREGATE ±4,000,000 3
B	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N N N/A	5257	01/06/2016	01/06/2017	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> BOTH E.L. EACH ACCIDENT ±1,000,000 E.L. DISEASE - EA EMPLOYEE ±1,000,000 E.L. DISEASE - POLICY LIMIT ±1,000,000
A	Pollution		SSP2008002	03/01/2016	03/01/2017	See Limits Below
C	Prop in Transit		JB165653	03/01/2016	02/28/2017	See Limits Below


DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

Pollution Liability: \$1,000,000 Each Pollution Condition; \$2,000,000 General Aggregate

Property in Transit: \$5,000,000 Special Form, \$25,000 Deductible

MCS 90 included

COPY

CERTIFICATE HOLDER State of New Hampshire Dept. of Environmental Services 6 Hazen Drive Concord, NH 03301	CANCELLATION 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 
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RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF WASTE MANAGEMENT
335 Promenade Street, Room 380
Providence, Rhode Island 02908

HAZARDOUS WASTE TRANSPORTER PERMIT

Approval Date: Friday, May 13, 2016

CHARLES J VOLPE
ADVANCED CHEMICAL CO
105 BELLOWS ST
WARWICK, RI 02888

COPY

PERMIT #: RI- 524 Permit Expiration Date: 6/30/2017

Application Received date: 5/9/2016 11:08:00 AM

Dear Hazardous Waste Transporter:

Your application to transport hazardous waste through and within the State of Rhode Island was received by the Department on the date shown above. Upon review of this application, it has been found to be complete, and is therefore approved by the Department. Your company Permit Number is shown above. This permit number, along with the name of your company, must appear on both sides and the back of all vehicles to be permitted.

Be advised that, the Department has a COMPANY-CERTIFIED inspection Program. The Department regularly performs random, unannounced inspections of permitted units, and expects that strict compliance with the requirements will be maintained at all times. Any unit not in compliance with all inspection requirements is liable for administrative action, including penalties.

Permits issued will be valid until the expiration date shown above. All units must be permitted annually. Renewal permit applications are typically sent out in February and are due in April. If you have any questions you may contact the Office of Waste Management at the information below:

Issued by: Alyson Brunelli Date Issued: 5/13/2016

Alyson Brunelli, Sanitary Engineer

Phone: (401) 222-2797 Ext. 7134 Email: alyson.brunelli@dem.ri.gov



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF WASTE MANAGEMENT
 235 Promenade Street, Room 380
 Providence, Rhode Island 02908

HAZARDOUS WASTE TRANSPORTER PERMIT

5/13/2016

CHARLES J VOLPE
 ADVANCED CHEMICAL CO
 105 BELLOWS ST
 WARWICK, RI 02888

COPY

RI PERMIT # 524

Dear Hazardous Waste Transporter:

The application for the following unit has been approved and said unit is hereby issued this permit, pursuant to Chapter 23-19.1 of the Rhode Island General Laws and Rules and Regulations for Hazardous Waste Management, to transport hazardous waste through and within the State of Rhode Island:

YEAR	MAKE	REGISTRATION	DECAL #	VIN#	EXP. DATE	Unit #/ Other
2006	FRTLNR	65572	1428	11099	30-Jun-17	TR 11

THE PERMIT FOR THIS UNIT SHALL BE EFFECTIVE AS OF THE DATE SHOWN ABOVE AND WILL EXPIRE ON THE EXPIRATION DATE INDICATED. BE ADVISED THAT THIS UNIT MUST COMPLY WITH THE REQUIREMENTS OF THESE RULES AND REGULATIONS AT ALL TIMES.

If you have any questions regarding this permit, please call us at the contact information listed below.

Alyson Brunelli, Sanitary Engineer

Phone: (401) 222-2797 Ext. 7134 Email: alyson.brunelli@dem.ri.gov

D·E·M



6/30/2017 N° 1428

Handwritten markings, possibly a signature or initials.

COPY

ACORD

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)
5/20/2016

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.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must 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).

PRODUCER Starkweather & Shepley PO Box 549 Providence, RI 02901-0549 401 435-3600	CONTACT NAME: Vicki Signore PHONE (A/C, No, Ext): 401 435-3600 FAX (A/C, No): 401 431-9632 E-MAIL ADDRESS: vsignore@starshep.com
	INSURER(S) AFFORDING COVERAGE
INSURED Advanced Chemical Company 105 Bellows Street Warwick, RI 02888	INSURER A: Nautilus Insurance Company
	INSURER B: Beacon Mutual Ins Co
	INSURER C: Lloyd's of London
	INSURER D: Great Divide Insurance Company
	INSURER E: INSURER F:

COVERAGES **CERTIFICATE NUMBER:** **REVISION NUMBER:**

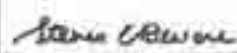
THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE 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.

INSR LTR	TYPE OF INSURANCE	ADDITIONAL INFO	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR GENL AGGREGATE LIMIT APPLIES PER <input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC <input type="checkbox"/> OTHER		GLP2008005	03/01/2016	03/01/2017	EACH OCCURRENCE \$1,000,000 DAMAGE TO RENTED PREMISES (Per occurrence) \$300,000 MED EXP (Any one person) \$10,000 PERSONAL & ADV INJURY \$1,000,000 GENERAL AGGREGATE \$2,000,000 PRODUCTS - COMP/OP AGG \$2,000,000 \$
D	AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO ALL OWNED AUTOS <input checked="" type="checkbox"/> NON-OWNED AUTOS <input checked="" type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> NON-OWNED AUTOS		BAP2008647-13	05/19/2016	05/19/2017	COMBINED SINGLE LIMIT (Per accident) \$1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
A	UMBRELLA LIAB <input type="checkbox"/> OCCUR <input checked="" type="checkbox"/> EXCESS LIAB <input checked="" type="checkbox"/> CLAIMS MADE DED. RETENTION \$		FFX2008006	03/01/2016	03/01/2017	EACH OCCURRENCE \$4,000,000 AGGREGATE \$4,000,000 \$
B	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETORS/ PARTNERS/ KEY/ OFFICERS/ MEMBERS EXCLUDED? (Mandatory in RI) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N N N/A	5257	01/06/2016	01/06/2017	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTHER E.L. EACH ACCIDENT \$1,000,000 E.L. DISEASE - EA EMPLOYEE \$1,000,000 E.L. DISEASE - POLICY LIMIT \$1,000,000
A	Pollution		SSP2008002	03/01/2016	03/01/2017	See Limits Below
C	Prop In Transit		JB165653	03/01/2016	02/28/2017	See Limits Below

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)
 Pollution Liability: \$1,000,000 Each Pollution Condition; \$2,000,000 General Aggregate

Property in Transit: \$5,000,000 Special Form, \$25,000 Deductible
 MCS 90 included

COPY

CERTIFICATE HOLDER State of Rhode Island Dept. of Environmental Management 235 Promenade Street Providence, RI 02908	CANCELLATION 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 
-----------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

A Federal Agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2126-008. Public reporting for this collection of information is estimated to be approximately 2 minutes per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, Federal Motor Carrier Safety Administration, MC-RRA, Washington, D.C. 20590.



United States Department of Transportation
Federal Motor Carrier Safety Administration

Endorsement for Motor Carrier Policies of Insurance for Public Liability
under Sections 29 and 30 of the Motor Carrier Act of 1980

FORM MCS-90

Issued to Advanced Chemical Company of 105 Belows Street Warwick, RI 02888
(Motor Carrier name) (Motor Carrier state or province)

Dated at Two Ravinia Drive, Atlanta, GA 30346 on this 10 day of May, 2016

Amending Policy Number: BAP2008647-13 Effective Date: 05/19/2016

Name of Insurance Company: Great Divide Insurance Company

Countersigned by: 
(authorized company representative)

The policy to which this endorsement is attached provides primary or excess insurance, as indicated for the limits shown (check only one)
 This insurance is primary and the company shall not be liable for amounts in excess of \$ 1,000,000 for each accident.
 This insurance is excess and the company shall not be liable for amounts in excess of \$ _____ for each accident in excess of the underlying limit of \$ _____ for each accident

Whenever required by the Federal Motor Carrier Safety Administration (FMCSA), the company agrees to furnish the FMCSA a duplicate of said policy and all its endorsements. The company also agrees, upon telephone request by an authorized representative of the FMCSA, to verify that the policy is in force as of a particular date. The telephone number to call is: 404-443-2040

Cancellation of this endorsement may be effected by the company of the insured by giving (1) thirty-five (35) days notice in writing to the other party (said 35 days notice to commence from the date the notice is mailed, proof of mailing shall be sufficient proof of notice), and (2) if the insured is subject to the FMCSA's registration requirements under 49 U.S.C. 13901, by providing thirty (30) days notice to the FMCSA (said 30 days notice to commence from the date the notice is received by the FMCSA at its office in Washington, DC).

DEFINITIONS AS USED IN THIS ENDORSEMENT

COPY

Accident includes continuous or repeated exposure to conditions or which results in bodily injury, property damage, or environmental damage which the insured neither expected nor intended.

Motor Vehicle means a land vehicle, machine, truck, tractor, trailer, or semitrailer propelled or drawn by mechanical power and used on a highway for transporting property, or any combination thereof.

Bodily Injury means injury to the body, sickness, or disease to any person, including death resulting from any of these

Property Damage means damage to or loss of use of tangible property

Environmental Restoration means restitution for the loss, damage, or destruction of natural resources arising out of the accidental discharge, dispersal, release or escape into or upon the land, atmosphere, watercourse, or body of water, of any commodity transported by a motor carrier. This shall include the cost of removal and the cost of necessary measures taken to minimize or mitigate damage to human health, the natural environment, fish, shellfish, and wildlife.

Public Liability means liability for bodily injury, property damage, and environmental restoration.

(continued on next page)

The insurance policy to which this endorsement is attached provides automobile liability insurance and is amended to assure compliance by the insured, within the limits stated herein, as a motor carrier of property, with Sections 29 and 30 of the Motor Carrier Act of 1980 and the rules and regulations of the Federal Motor Carrier Safety Administration (FMCSA)

In consideration of the premium stated in the policy to which this endorsement is attached, the insurer (the company) agrees to pay, within the limits of liability described herein, any final judgment recovered against the insured for public liability resulting from negligence in the operation, maintenance or use of motor vehicles subject to financial responsibility requirements of Sections 29 and 30 of the Motor Carrier Act of 1980 regardless of whether or not each motor vehicle is specifically described in the policy and whether or not such negligence occurs on any route or in any territory authorized to be served by the insured or elsewhere. Such insurance as is afforded, for public liability, does not apply to injury to or death of the insured's employees while engaged in the course of their employment, or property transported by the insured, designated as cargo. It is understood and agreed that no condition, provision, stipulation or limitation contained in the policy, this endorsement, or any other endorsement thereon, or violation thereof, shall relieve the

company from liability or from the payment of any final judgment, within the limits of liability herein described, irrespective of the financial condition, insolvency or bankruptcy of the insured. However, all terms, conditions and limitations in the policy to which the endorsement is attached shall remain in full force and effect as binding between the insured and the company. The insured agrees to reimburse the company for any payment made by the company on account of any accident, claim, or suit involving a breach of the terms of the policy, and for any payment that the company would not have been obligated to make under the provisions of the policy except for the agreement contained in this endorsement.

It is further understood and agreed that, upon failure of the company to pay any final judgment recovered against the insured as provided herein, the judgment creditor may maintain an action in any court of competent jurisdiction against the company to compel such payment.

The limits of the company's liability for the amounts prescribed in this endorsement apply separately to each accident and any payment under the policy because of any one accident shall not operate to reduce the liability of the company for the payment of final judgments resulting from any other accident.

SCHEDULE OF LIMITS - PUBLIC LIABILITY

Type of carriage	Commodity transported	January 1, 1985
(1) For-hire (in interstate or foreign commerce, with a gross vehicle weight rating of 10,000 or more pounds).	Property (nonhazardous)	\$750,000
(2) For-hire and Private (in interstate, foreign, or intrastate commerce, with a gross vehicle weight rating of 10,000 or more pounds).	Hazardous substances, as defined in 49 CFR 171.8, transported in cargo tanks, portable tanks, or hopper-type vehicles with capacities in excess of 3,500 water gallons; or in bulk Divisions 1.1, 1.2, and 1.3 materials, Division 2.3, Hazard Zone A or Division 6.1, Packing Group 1, Hazard Zone A material, in bulk Division 2.1 or 2.2; or highway route controlled quantities of a Class 7 material, as defined in 49 CFR 173.403.	\$5,000,000
(3) For-hire and Private (in interstate or foreign commerce, in any quantity; or in intrastate commerce, in bulk only; with a gross vehicle weight rating of 10,000 or more pounds).	Oil listed in 49 CFR 172.101; hazardous waste, hazardous materials, and hazardous substances defined in 49 CFR 171.8 and listed in 49 CFR 172.101, but not mentioned in (2) above or (4) below.	\$1,000,000
(4) For-hire and Private (in interstate or foreign commerce, with a gross vehicle weight rating of less than 10,000 pounds).	Any quantity of Division 1.1, 1.2 or 1.3 material; any quantity of a Division 2.3, Hazard Zone A, or Division 6.1, Packing Group 1, Hazard Zone A material, or highway route controlled quantities of a Class 7 material as defined in 49 CFR 173.403.	\$5,000,000

*The schedule of limits shown does not provide coverage. The limits shown in the schedule are for information purposes only.

COPY



State of Vermont
Agency of Natural Resources
Main Tel. # (802) 828-1138

MAY 03 2016

MAIL ALL COMPLETED, ORIGINAL FORMS TO:

Department of Environmental Conservation
Waste Management & Prevention Division
Attn: Cheryl Hamilton
1 National Life Drive, Davis 1, Montpelier, VT 05620-3704
Telephone: (802) 522-5949 Email: Cheryl.Hamilton@vermont.gov

VERMONT WASTE TRANSPORTATION VEHICLE REPORT FORM

—This Vehicle Report Form is Valid July 1, 2016 through June 30, 2017—

Please review the first three boxes below to determine which applications / forms you will need to mail to us.
Applications / Forms - go to the following link: <http://www.anr.state.vt.us/dec/wastediv/solid/transport.htm>

Check ONLY ONE of the following boxes and provide the proper application(s) / form(s) with a check to the address above.

<input type="checkbox"/> NEW PERMIT APPLICATION Note: Permit must be renewed every 5 years with the following forms, and a check. <input checked="" type="checkbox"/> Vehicle Report Form <input checked="" type="checkbox"/> Business Disclosure Statement <input checked="" type="checkbox"/> Personal History Disclosure <input checked="" type="checkbox"/> A check (see fee's below)	<input checked="" type="checkbox"/> ANNUAL RENEWAL Note: You must renew your permit each year during the 5 Year permit process with the following forms, and a check. <input checked="" type="checkbox"/> Vehicle Report Form <input checked="" type="checkbox"/> Annual Statement <input checked="" type="checkbox"/> A check (see fee's below)	<input type="checkbox"/> MODIFICATION Note: You must submit a modification to add vehicles anytime during your 5 Year permit process, and a check. <input checked="" type="checkbox"/> Vehicle Report Form <input checked="" type="checkbox"/> A check (see fee's below)
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Non-hazardous waste haulers transporting materials out-of-state for disposal must complete a Franchise Tax form and send it directly to the Department of Taxes on a quarterly basis, which can be found at the following link: <http://tax.vermont.gov/search/node/franchise%20tax>. Send a "copy" of the completed Franchise Tax form to the address at the top of this application.
Identify the destination facility(ies): N/A

HAULER / TRANSPORTER CONTACT INFORMATION

COPY

Name of Business: Advanced Chemical Company

Contact Name: Charles J. Volpe Title: Environmental Manager

Mailing Address: 105 Bellows Street City/Town: Warwick State: RI Zip: 02888

Telephone: () Email Address:

VEHICLE FEES

Description of specific types of hauler vehicles and fees:	Qty.	Fee	Total Cost
<u>\$125 for ALL Hazardous Waste Haulers</u> , for each vehicle, regardless of size	<u>1</u>	<u>\$125</u>	<u>\$ 125.00</u>
<u>2 axle = \$50</u> - for each pickup, each stake-body, each utility trailer		<u>\$50</u>	<u>\$</u>
<u>3 or 4 axle = \$75</u> - for each packer, each dump, each roll-off, or each box truck		<u>\$75</u>	<u>\$</u>
<u>All others = \$100</u> - for each tractor, or each trailer. Each one must be permitted		<u>\$100</u>	<u>\$</u>
Checks are made payable to: <u>Treasurer, State of Vermont</u>	Total →	<u>/</u>	<u>\$ 125.00</u>

Check the boxes below indicating all wastes that you are transporting:

<input checked="" type="checkbox"/> Solid Waste	<input checked="" type="checkbox"/> Hazardous Waste	<input type="checkbox"/> C&D	<input type="checkbox"/> Medical	<input type="checkbox"/> Organics	<input checked="" type="checkbox"/> Recyclables
<input checked="" type="checkbox"/> Scrap Metal	<input type="checkbox"/> Septage	<input type="checkbox"/> Tires	<input type="checkbox"/> Wastewater Treatment Sludge	<input type="checkbox"/> Bio solids	
<input type="checkbox"/> Other-Describe:					

Go to page 2 of this application. →

Name of Business (continued): _____

You must provide the following information for each vehicle to be included in your waste transporter permit.

VEHICLES PERMITTED		Gold Cab		
1.	Vehicle Make, Model, Type: Freightliner Business Class M-2	# of Axles: 2	Color: Blk Box	Year: 2006
	VIN#: 1FVACWDC66HW11099	Registration#:	65572	State: RI
2.	Vehicle Make, Model, Type:	# of Axles:	Color:	Year:
	VIN#:	Registration#:		State:
3.	Vehicle Make, Model, Type:	# of Axles:	Color:	Year:
	VIN#:	Registration#:		State:
4.	Vehicle Make, Model, Type:	# of Axles:	Color:	Year:
	VIN#:	Registration#:		State:
5.	Vehicle Make, Model, Type:	# of Axles:	Color:	Year:
	VIN#:	Registration#:		State:
6.	Vehicle Make, Model, Type:	# of Axles:	Color:	Year:
	VIN#:	Registration#:		State:
7.	Vehicle Make, Model, Type:	# of Axles:	Color:	Year:
	VIN#:	Registration#:		State:
8.	Vehicle Make, Model, Type:	# of Axles:	Color:	Year:
	VIN#:	Registration#:		State:
9.	Vehicle Make, Model, Type:	# of Axles:	Color:	Year:
	VIN#:	Registration#:		State:
10.	Vehicle Make, Model, Type:	# of Axles:	Color:	Year:
	VIN#:	Registration#:		State:

Please use additional sheet if needed.

APPLICANT'S SIGNATURE: Charles J. Pope DATE: 4/26/16

FOR DEPARTMENT USE ONLY					
Vehicle Report Form & check	Fee Amt. Rec'd.:	Check#	Processed check	Corporation	Scanned & saved
received on: <u>5/3/2016</u>	<u>\$ 125</u>	<u>60264</u>	<u>5/5/2016</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<u>5/5/2016</u>
# of stickers <u>1</u> and approved permit mailed to hauler on <u>5/5/2016</u>	Incomplete, due to insufficient paperwork, or other reason: Explain: _____		Approved by: <u>Charles Hamilton</u> Date: <u>5/5/16</u>		



**STATE OF
VERMONT**

**WASTE
TRANSPORTER
PERMIT**

**AUTHORIZES OPERATION IN
VERMONT UNDER T10 V.S.A.
SEC. 6607a**

**Expires
June 30,
2017**

COPY

ACORD

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

5/20/2016

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.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must 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).

PRODUCER Starkweather & Shepley PO Box 549 Providence, RI 02901-0549 401 435-3600	CONTACT NAME: Vicki Signore	PHONE (AC. No. Ext.): 401 435-3600	FAX (AC. No.): 401 431-9532
	E-MAIL ADDRESS: vsignore@starshep.com		
INSURED Advanced Chemical Company 105 Bellows Street Warwick, RI 02888	INSURER(S) AFFORDING COVERAGE		NAIC #
	INSURER A: Nautilus Insurance Company		
	INSURER B: Beacon Mutual Ins Co		24017
	INSURER C: Lloyd's of London		15792
	INSURER D: Great Divide Insurance Company		25224
	INSURER E:		
INSURER F:			

COVERAGES

CERTIFICATE NUMBER:

REVISION NUMBER:

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.

NEW YR	TYPE OF INSURANCE	ADDL SUBR INSR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR		GLP2008005	03/01/2016	03/01/2017	EACH OCCURRENCE ±1,000,000 DAMAGE TO RENTED PREMISES (EA POLICY) ±300,000 MED EXP (Any one person) ±10,000 PERSONAL & ADV INJURY ±1,000,000 GENERAL AGGREGATE ±2,000,000 PRODUCTS - COMPROP AGG ±2,000,000 \$
	GENL AGGREGATE LIMIT APPLIES PER: <input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PROJECT <input type="checkbox"/> LOC <input type="checkbox"/> OTHER					
D	AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO ALL OWNED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS <input type="checkbox"/> SCHEDULED AUTOS NON-OWNED AUTOS		BAP2008647-13	05/19/2016	05/19/2017	COMBINED SINGLE LIMIT (EA ACCIDENT) ±1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
A	UMBRELLA LIAB <input checked="" type="checkbox"/> EXCESS LIAB OCCUR <input checked="" type="checkbox"/> CLAIMS-MADE		FFX2008006	03/01/2016	03/01/2017	EACH OCCURRENCE ±4,000,000 AGGREGATE ±4,000,000 \$
B	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER (EXCLUDED) (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N N	5257	01/06/2016	01/06/2017	X PER STATUTE OTH \$ E.L. EACH ACCIDENT ±1,000,000 E.L. DISEASE - EA EMPLOYEE ±1,000,000 E.L. DISEASE - POLICY LIMIT ±1,000,000
A	Pollution		SSP2008002	03/01/2016	03/01/2017	See Limits Below
C	Prop In Transit		JB165653	03/01/2016	02/28/2017	See Limits Below

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

Pollution Liability: \$1,000,000 Each Pollution Condition; \$2,000,000 General Aggregate

Property in Transit: \$5,000,000 Special Form, \$25,000 Deductible

MCS 90 Included

COPY

CERTIFICATE HOLDER

CANCELLATION

State Of Vermont 1035 Main Street West Building Waterbury, VT 05671-0404	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 <i>Steve Brown</i>



COPY

Certificate Of Registration QUALITY MANAGEMENT SYSTEM

This is to Certify that the Quality Management System
of

ADVANCED CHEMICAL COMPANY

Address:

105 Bellows St. Warwick, RI 02888. U.S.A.

131 Bellows St. Warwick, RI 02888. U.S.A.

45 B Commerce Drive Warwick, RI 02886. U.S.A.

has been assessed and found to comply with the requirements of:

ISO 9001:2008

(Quality Management System)

Clause 7 permissible Exclusions: 7.3

Scope of Certification:

Recovery through Shredding and Refining of Precious Metals for Industrial,
Jewelry, Pharmaceutical and Electronic Application; Manufacture of Precious and
Non-Precious Metal Products for the Electroplating and Surface Finishing Industries.

Sector Code: (ANZSIC CODE: 2949)

Certificate Number: USA/QMS/00014

Issue no.: 02

Date of approval : 01.05.2014

Valid until : 30.04.2017

Revision no: nil

Revision date : nil



Initial Certification Date: 01.05.2011



Sv-1


Head of Certification

Sv-2



JAS-ANZ



ACC.No.M4151008K

MS CERTIFICATION SERVICES, USA

Address: 1100 NASA PARKWAY, Suite #420J Houston, Texas, USA- 77058

www.ms-certification.net

The validity of this certificate can be verified at www.jas-anz.org/register
The Certificate is Valid Only if the Annual Surveillance Mark is Signed by Auditor on Original.

F80 rev 04



COPY

ADVANCED CHEMICAL COMPANY QUALITY POLICY

Advanced Chemical Company has established its quality policy to provide assurance that our products and services meet our customer's expectations. The quality management system is an integral part of Advanced Chemical Company's strategy to continuously enhance and differentiate its delivery of products and services to our customers. The system has been designed and implemented in order to satisfy all major requirements of the ANSI/ISO/ASQ Q9001-2008 standard.

All Advanced Chemical Company employees are aware of Management's commitment to providing quality products and services. They are fully trained to succeed in their respective roles within the quality management system and to embrace this quality policy.

Management and employee efforts will ensure that the following goals are achieved:

- Total customer satisfaction.
- Unmatched reputation for integrity & reliability.
- Persistent increases in sales growth.
- Conscientious work habits and regard for expenses.
- Respect and consideration for all employees.
- A safe and quality-oriented working environment.

Each of these goals provides a framework for the management's development of the company's measurable quality objectives. Management will insure that the quality objectives will be implemented at all organizational levels and periodically reviewed as customer needs change.

My personal commitment will be to ensure the quality management system (including this quality policy) is communicated throughout the organization, quantitatively measured, evaluated for suitability and a real component of every employee's job. I will ensure that critical resources are available and empower management to identify ways to continually improve the system so that quality objectives can be achieved. Such improvement shall consist of preventive measures focused on reducing the organization's costs and enhancing overall customer satisfaction.

Gerald A. Smith III,

President



MS CERT

Certificate Of Registration

ENVIRONMENTAL MANAGEMENT SYSTEM

This is to certify that the Environmental Management System
of

ADVANCED CHEMICAL COMPANY

Address:

105 Bellows Street, Warwick, RI 02888. U.S.A.

131 Bellows Street, Warwick, RI 02888. U.S.A.

45 B Commerce Drive Warwick, RI 02886. U.S.A.

has been assessed and found to comply with the requirements of:

ISO 14001:2004

(Environmental Management System)

Scope of Certification:

Recovery through Shredding and Refining of Precious Metals for Industrial, Jewellery, Pharmaceutical and Electronic Application; Manufacture of Precious and Non-Precious Metal Products for the Electroplating and Surface Finishing Industries.

Sector Code: (ANZSIC CODE: 2949)

Certificate Number: USA/E/00002

Issue no.: 02

Date of approval : 01.07.2015

Valid until : 01.06.2018

Revision no: nil

Revision date : nil

Initial Certification Date: 01.07.2012



№1

Head of Certification



№2



MS CERT

JAS-ANZ



ACC.No.M4151008IK

MS CERTIFICATION SERVICES, USA

Address: 1100 NASA PARKWAY, Suite #420J Houston, Texas, USA-77058.

www.ms-certification.net

The Accreditation Body is Joint Accreditation System of Australia and New Zealand (JAS-ANZ)

The validity of this certificate can be verified at www.jas-anz.org/register

The Certificate is Valid Only if the Annual Surveillance Mark is Signed by Auditor on Original

F60 rev. 03

COPY

COPY



ADVANCED CHEMICAL COMPANY
PRECIOUS METALS REFINING
105 BELLOWS ST. WARWICK, RI 02888
PHONE: 401.785.3434 FAX: 401.941.9210
www.advchem.com

Environmental Policy

Advanced Chemical Company adopts measures to protect the environment and prevent pollution through compliance with applicable legal and other requirements related to environmental aspects for refining and product manufacturing operations. Top management is committed to continually improve the performance of the environment through mitigating the impacts of the significant aspects.

Top management achieves the above tasks through a documented, implemented and maintained Environmental Management System (EMS) conforming to ISO 14001:2004. Top management ensures that every employee and supplier/sub-contractor understands and complies with the requirements of the organization's EMS through the posted policy in the company's website. Established environmental objectives, policy, targets and programs, procedures and instructions shall be periodically reviewed for adequacy, continuing suitability and effectiveness of this EMS.

A handwritten signature in black ink that reads "Gerald A. Smith III". The signature is written in a cursive style with a horizontal line underneath.

Mr. Gerald A. Smith III
President & COO
Advanced Chemical Company
11/2/11



COPY

Certificate Of Registration

Occupational Health & Safety Management Systems

This is to certify that the OHSAS
of:

ADVANCED CHEMICAL COMPANY

Address:

105 Bellows St. Warwick, RI 02888. U.S.A.
131 Bellows St. Warwick, RI 02888. U.S.A.
45 B Commerce Drive Warwick, RI 02886. U.S.A.

has been assessed and found to comply with the requirements of:

OHSAS 18001:2007

(Occupational Health & Safety Management Systems)

Scope of Certification:

Recovery through Shredding and Refining of Precious Metals for Industrial, Jewelry, Pharmaceutical and Electronic Application; Manufacture of Precious and Non-Precious Metal Products for the Electroplating and Surface Finishing Industries.

ANZIC CODE: 2949

Certificate Number: USA/OHS/00003

Issue no.: 01

Date of approval : 03.05.2014

Valid until : 02.05.2017

Revision no: nil

Revision date : nil

Original Certification Date: 03.05.2014



MS-1

Head of Certification



MS-2



MS CERT

JAS-ANZ



ACC.No.M4151008

MS CERTIFICATION SERVICES, USA

1100 NASA PARKWAY, Suite #420J Houston, Texas, USA-77058

www.ms-certification.net

The Accreditation Body is Joint Accreditation System of Australia and New Zealand(JAS-ANZ)

The validity of this certificate can be verified at www.jas-anz.org/register

The Certificate is Valid Only if the Annual Surveillance Mark is Signed by Auditor on Original.

P60 rev-05

COPY

Occupational Health and Safety Policy

Advanced Chemical Company is committed to prevent occupational injuries and illnesses to its employees while they conduct precious metal and semi-precious metal recycling operations, which also include manufacturing, size reduction, laboratory analysis and transportation processes. The company will take into consideration the health and safety hazards/risks that are part of the various processes that employees perform.

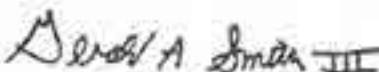
The management commits to monitor the working conditions of employees and take appropriate corrective and preventive actions to prevent the recurrence of an existing unsafe/unhealthy situation. The company will also take such actions to eliminate the chance of a potential unsafe/unhealthy problem, which will continually improve the performance of the established occupational health and safety system per OSHAS 18001:2007.

As a part of employment, health and safety rules and guidelines, including this policy, shall be observed by employees at all times. Employees' decisions on how and when to do a job should always be guided by the company's policy to health and safety. Whenever a conflict between an employee's health and safety or the company's production processes exists, employee health and safety shall always take precedence. Any employee that may be exposed to an unsafe working condition or an imminently dangerous situation may suspend any or all work activities until the unsafe working condition is corrected.

Advanced Chemical Company commits to meet the following goals as a result of this safety policy:

- Provide a safe and healthy work environment for all employees, visitors, contractors and customers alerting them on individual occupational health and safety obligations.
- Reduce the number of safety and health incidents by appropriate engineering design/other controls (PPE, training, etc.).
- Reduce employee down time due to injury or illness of employees through routine monitoring.
- Monitor compliance and take appropriate corrective and preventive actions to assure compliance with legal and other requirements to which the organization subscribes that relate to its occupational health and safety hazards.
- Increase customer confidence in our safe work environment.
- Set the standard for health and safety for our industry by reviewing periodically the extent of fulfillment of defined targets and objectives, in addition to the company's fulfillment of this policy's stated goals.

Advanced Chemical Company's commitment to this health and safety policy shall include disciplinary action, including possible employee termination, to any disregard of a safety rule or guideline. Top management reviews periodically this occupational health and safety policy to ensure that it remains relevant and appropriate to the current business of the organization. This policy is available to all interested parties through the company's website and postings at all facilities.



Gerald A. Smith III
President

4-1-2014
DATE