



**CRI Recycling Service
Facility Audit Information**

APRIL 2012

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Introduction



- CRI Recycling Service, Inc. has an absorbent and oil filter recycling operation located in Woodville, WI. The facility uses a solvent cleaning system to extract the oil, grease and other petroleum contaminants from oil absorbent materials (granular material, mats, pads and socks as well as oil filters). During the cleaning process, a minimum of 95% of the oil and grease is removed from the absorbent material and the recycled material has approximately 95%+ of the absorptive capacity when compared to virgin materials. Additionally, approximately 99+% of the solvent that is used in the cleaning process will be recycled and reused for future cleaning cycles.
- The cleaning process will create four residual materials; used oil, cleaned oil absorbent material, cleaned filter metal and cleaned filter paper. Each of these residual materials will be recycled; used oil is re-refined to lube stock or burned for energy recovery, cleaned granular oil absorbent material is recycled back to the generators, uncontaminated cleaned poly material is used as filler for absorbent sock, used filter paper is used for energy recovery and filter metal is sold to foundries.

Facility Information & Company History



- Facility name and address:

Corporate Office and Recycling Plant
101 Hagen Drive
Woodville, WI 54028
Tel: (715) 698-3363
Fax: (715) 698-3485
www.crirecycling.com

- Facility Management:
President & CEO - Brian King
Plant Manager – Jeremy Fussy
Regulatory Contact – Jeremy Fussy

- Company History:

CRI Recycling Service, Inc. was incorporated in August, 1996. The Company was primarily in the Research & Development stage until April, 1998 when the processing equipment was placed into service. The Company is marketing its recycling service to industry allowing the reuse of oil absorbent material and the recycling of the removed oil and recycling of used oil filters.

- Facility Layout:

The processing facility is located in Woodville, WI (approximately 24 miles east of Hudson, WI). The facility is located in the Village of Woodville Industrial Park. The land use for the surrounding area is agricultural and industrial. Included in the Additional Information Section of this Audit Package is a Facility Location, Map and a Facility Layout.

Facility Layout & Site Information



- Facility Layout:

The processing facility is located in Woodville, WI (approximately 24 miles east of Hudson, WI). The facility is located in the Village of Woodville Industrial Park. The land use for the surrounding area is agricultural and industrial. Included in the Additional Information Section of this Audit Package is a Facility Location Map and a Facility Layout.

- Site Information:

The distance from the facility to the nearest Municipal well is approximately 2000'.

The distance from the facility to the nearest surface water is approximately 1/2 mile (small creek).

The depth to groundwater at the facility is approximately 55-60'.

The dominant soil type at the site is sandy clay.

Organizational Information



- Corporate Information and Key Employee Contacts:

- CRI Recycling Service, Inc. is registered as a corporation in the State of Minnesota and is also licensed and registered in the State of Wisconsin and California. An Organizational Chart depicting on-site Corporate relationships is included in the Additional Information Section of this Audit Package.

- Key employees for CRI include:
 - Brian King President and CEO
 - Jeremy Fussy Plant Manager
 - Joe Mattson Vice President Sales
 - Jeremy Fussy Regulatory Contact
 - Dawn Wickman Office/Account Manager

- Corporate Reporting Identification Numbers are listed as follows:
 - Federal ID # - 41-1848904
 - EPA ID # - WIR000029751
 - NAICS # - 324191
 - SIC Code - 2992

Organizational Information (continued)



- Additional Corporate Information:

CRI Recycling Service, Inc. has an approval from the State of Wisconsin Department of Natural Resources (DNR) to operate a absorbent recycling facility in Woodville, WI. Additional regulatory approvals related to the recycling facility include a Air Pollution Control Permit. Included in the Additional Information Section of this Audit Package are documents confirming these regulatory items.

CRI Recycling Service, Inc. has a \$1,000,000/\$2,000,000.00 pollution prevention insurance policy and a \$3,000,000 umbrella in place. A copy of the Certificate of Insurance is included in the Additional Information Section of this Audit Package.

Processing Capabilities



- Services Available On-Site:

CRI Recycling Service, Inc. has developed a process that is capable of removing petroleum based products from oil absorbent materials. These absorbent materials include both granular materials (diatomaceous earth, clay and cellulose) and mats, pads and socks (polypropylene and blended materials) and oil filters. The CRI process has the capability of removing 98+% of the petroleum contaminants from the absorbent material and providing the material with 95+% of the absorptive capacity when compared to virgin material. Included in the Additional Information Section of this Audit Package is independent lab certification regarding system capabilities. The process uses a non-CFC solvent to clean the used absorbent material. Additionally, the process is run as a batch process to allow for individual material tracking. With each batch process, approximately 99+% of the cleaning solvent that is used is recycled and reused in future cleaning cycles.

- Waste Profile Analysis:

A pre-qualification of each potential customer is completed prior to accepting their used absorbent material at the CRI absorbent Recycling facility. The Customer Waste Survey and the Waste Profile Analysis Flowchart are included in the Additional Information Section of this Audit Package.

Processing Capabilities (Continued)



■ Non-Hazardous Solid Wastes Generated On-Site:

The CRI Recycling facility will generate a small amount of solid waste including:

- Office Paper
- Metal Shavings (from customer drums)
- Miscellaneous Shop Debris (from customer drums)
- Fine Sand From Shop Floors (from customer drums)

All of the materials listed above that are capable of being recycled will be (paper, metals, etc.). The fine sand that is generated from the recycling process may be used as absorbent material at CRI and for customers that request this type of material. Oily non-processable waste (garbage from customers) is sent to a waste to energy facility.

■ Facility Operation Hours:

The CRI Absorbent Recycling facility office is operating from 8:00 AM to 5:00 PM, Monday through Friday.

■ Transportation:

Each CRI Recycling Service territory is serviced by CRI Company Trucks staffed by CRI employees.

Material Storage Practices and Capacities



- Permitted Wastes Stored at Facility:

The permitted wastes that are allowed to be stored at the CRI Recycling facility are listed as follows:

- Used Oil (stored in 210-gallon totes)
- Used Oil Sorbents (stored in 210-gallon totes)
- Used Oil Filters (stored in 210-gallon totes)
- Oily Water (stored in 210-gallon totes)

- Above Ground Storage Tanks:

The above ground storage tanks located at the CRI Recycling facility are listed as follows:

- One 550-gallon used oil storage tank
- One 6565-gallon Solvent storage tank
- Two 5000 gallon Vapor tanks

- Wisconsin DNR State Air Permit
Permit Number: 659083780-ROPA
Issue Date: 11-06-2008

- Included in the Additional Information Section of this Audit Package is a Facility Layout plan showing the location of the above ground storage tanks at the CRI Recycling facility. There are no underground storage tanks located at the CRI Recycling facility.

Laboratory Capabilities & Waste Stream Qualification



- Quality Control Lab:

In-house quality control testing will be performed on each of the end products (used oil and recycled absorbent). The used oil will be screened for the following contaminants:

- Total Halogens
- Flash Point
- Water Content

The used oil will be tested in lots of 200-220 gallons. This material is shipped off-site to be re-refined into marine grade fuels or lube stock or burned on-site or off site for energy recovery.

The recycled absorbents will be randomly tested to ensure proper oil and grease removal. A soxhlet extraction test will be used to measure the remaining petroleum contaminants on the recycled absorbent material.

Off-Site independent analysis of the waste oil is done periodically for the

- following parameters:

- PCB's
- VOC's
- Arsenic
- Cadmium
- Chromium

Waste Disposal and Recycling Information



Company Information:

Regulatory Contact:

Wisconsin DNR
1300 W. Clairemont
Eau Claire, WI 54702

Contact: Jill Schoen
Phone: (715) 839-2788

Recycled Plastic:

North Star Wiper
1506 Buerkle Road
St. Paul, MN 55110

Contact: Don Rogahn
Phone: (800) 787-0780

Scrap Metal:

Alter Metal Recycling
3532 White Ave
Eau Claire, WI 43703

Contact: John Hime
Phone: (715) 832-3431
Fax: (715) 832-3966

Used Oil:

OSI Environmental, Inc.
20401 County Rd 81
Rogers, MN 55374

Contact: Cory Nelson
Phone: (763) 428-8775

Unprocessable Oily Waste:

Barron County Waste-to-Energy Facility
575 101/2 Avenue
Almena, WI 54805

Contact: Alan Zeltner
Phone: (715) 357-6566
Fax: (715) 357-3006

Material Receiving and Pre-unloading Procedures



- Material Testing:

Each CRI Customer will go through a prescreening analysis performed by CRI. The prescreening analysis will consist of the Material Survey, Material Survey Supplement, any necessary testing and the Waste Analysis Flowchart (see Additional Information Section). This prescreening process will ensure that CRI is only accepting and processing non-hazardous absorbent material.

As each drum is picked up from the generator, it is labeled with a unique number and manifested. Individual material tracking is provided for each drum with the unique drum number and the waste manifest.

Additionally, each drum that enters the facility can be tested to ensure the absorbent material is nonhazardous.

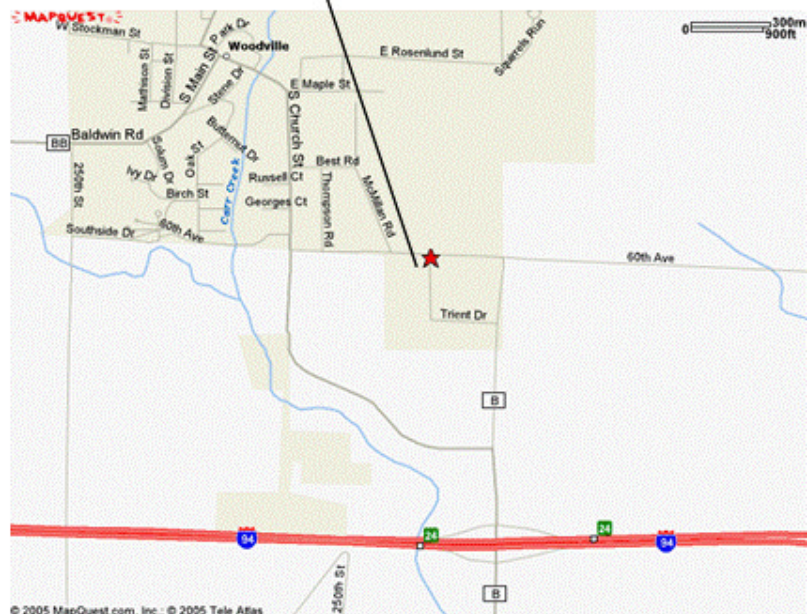
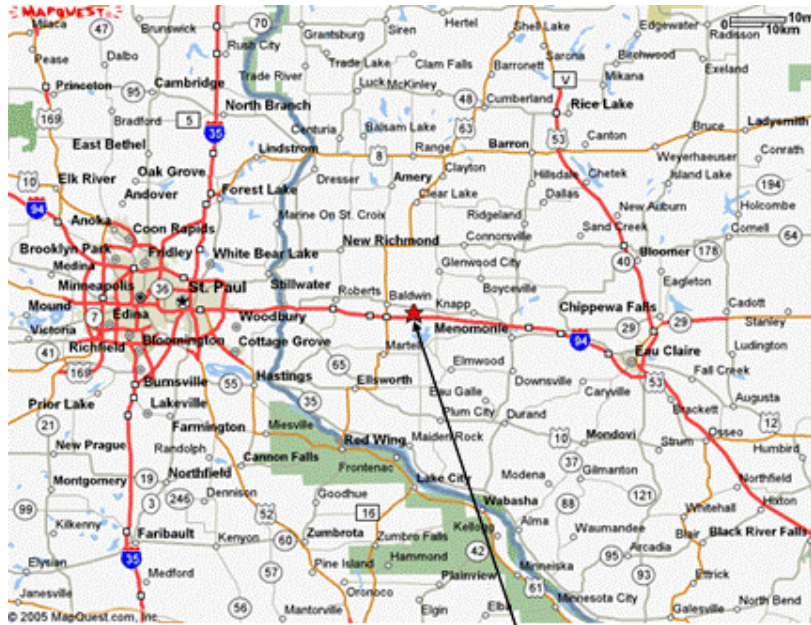
Additional Information



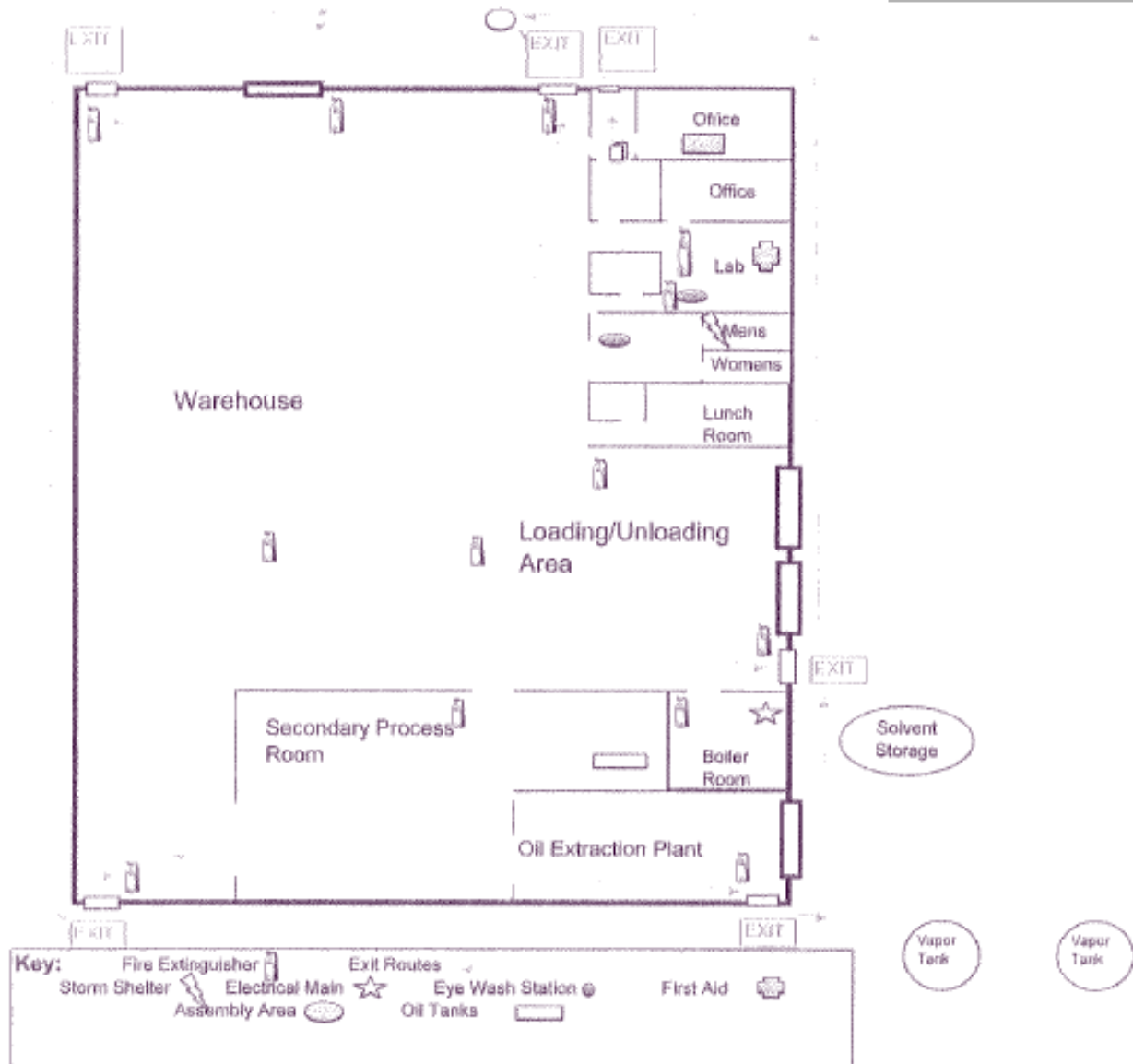
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- Facility Location Map
 - Facility Layout
 - Corporate Organizational Chart
 - WI DNR Operating Permit
 - WI DNR - EPA Identification Number
 - WI DNR Transportation Permit
 - Certificate of Insurance
 - Waste Profile Analysis Flowchart
 - Material Survey and Supplement

CRI Recycling Service, Inc.

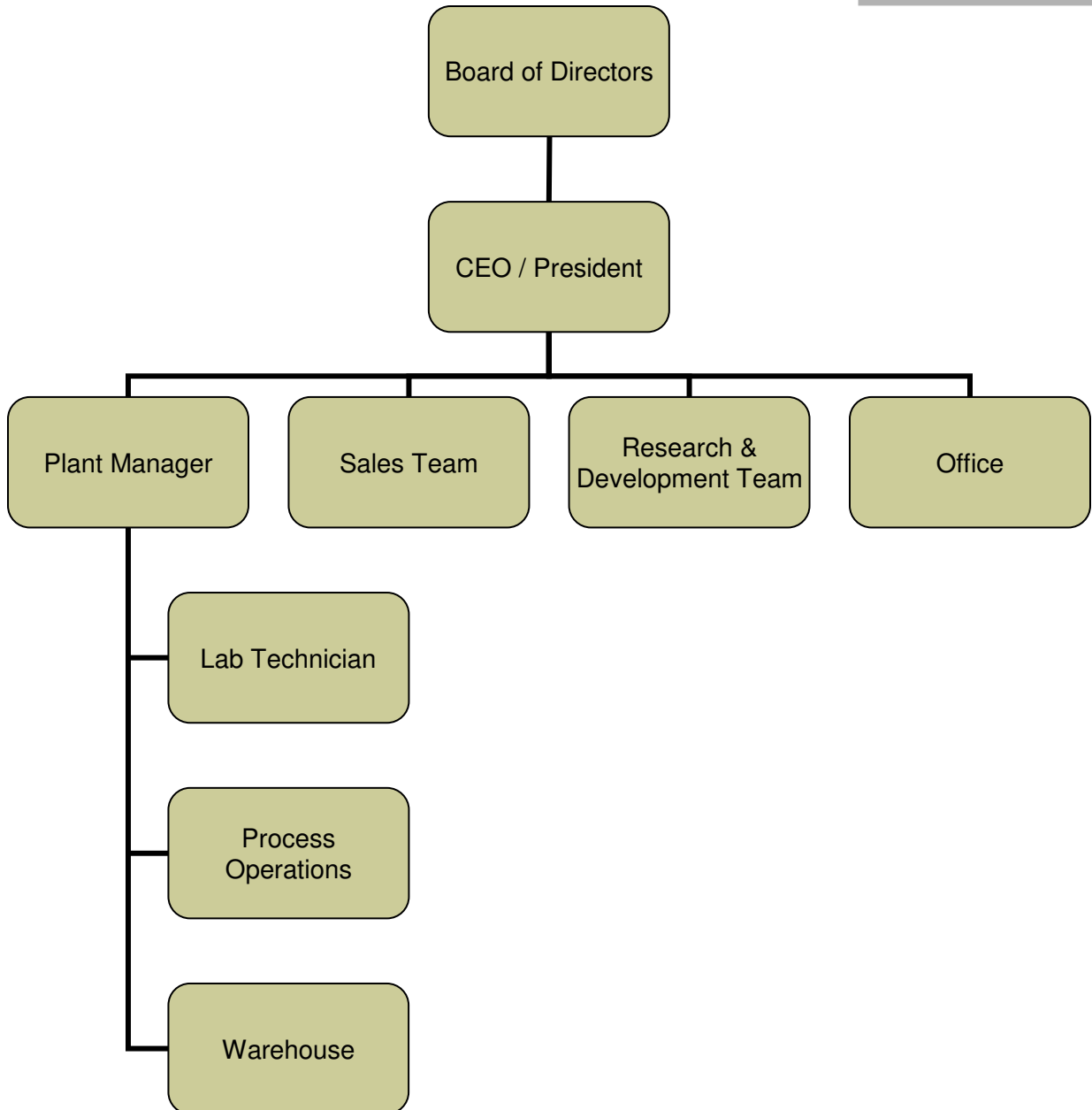
Facility Location Map



Facility Layout



Corporate Organizational Chart



WI DNR Operating Permit



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary
Scott Humrickhouse, Regional Director

West Central Region Headquarters
1300 W. Clairemont Avenue
PO Box 4001
Eau Claire, Wisconsin 54702-4001
Telephone 715-839-3700
FAX 715-839-6076
TTY Access via relay - 711

January 12, 2007

CRI Recycling Services, Inc.
Mr. Brian King
101 Hagen Drive
Woodville, WI 54028

HW/CORR
FID 656083780
St. Croix County

Subject: Used Oil Processing and Marketing

Dear Mr. King:

The purpose of this letter is to summarize the licensing exemptions available for facilities, such as CRI Recycling Services, that market and process used oil.

Per sections NR 502.05(3)(e) and NR 502.08(2)(c), Wis. Adm. Code, facilities that store and process used oil which is managed in compliance with ch. NR 679, Wis. Adm. Code, are exempt from solid waste facility standards, including licensing requirements. In addition, per s. NR 661.06, Wis. Adm. Code, used oil that is recycled is not subject to the hazardous waste management standards in chs. NR 660 to 668, Wis. Adm. Code, but is regulated as used oil under ch. NR 679. Chapter NR 679, Wis. Adm. Code, provides standards for persons managing used oil, but does not include licensing requirements. Persons transporting used oil are required to obtain a solid waste transportation license. Currently, CRI Recycling Services has a license (#14354) to transport solid waste.

In summary, owners and operators of facilities, such as CRI, that process and/or market used oil in compliance with the used oil management standards, are not required to obtain a solid or hazardous waste operating license.

I hope that you find this information useful. If you have questions, please contact me at (715) 839-2788, or jill.schoen@wi.gov. Thank you.

Sincerely,

Jill Schoen, CHMM
Waste Management Specialist

C: WCR Files
Dave Lundberg – david.lundberg@wi.gov



WI DNR EPA Identification Number



State of Wisconsin \
DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor
George E. Meyer, Secretary

Box 7921
101 South Webster Street
Madison, Wisconsin 53707-7921
TELEPHONE 608-266-2621
FAX 608-267-3579
TDD 608-267-6897

CONTROL RESOURCES
Attn: John Summerfield
101 Hagen Dr
Woodville WI 54028

Dear Notifier:

Below you will find the United States Environmental Protection Agency (U.S. EPA) Identification (ID) number that has been assigned to your installation.

WIR000029751

*CONTROL RESOURCES
101 HAGEN DR
WOODVILLE*

This ID number must be included on all shipping manifest(s) for transporting hazardous wastes and on all correspondence and reports.

Please note the U.S. EPA number is site specific. If your installation changes locations, a new notification is required to obtain a new ID number. If your installation has changed ownership, a subsequent notification must be filed to allow the new owner to use the ID number.

If you have any questions regarding hazardous waste activity, please contact the WDNR contact for your county (See enclosure). If you have questions regarding the EPA ID's for your sites, please call me at (608) 264-6022.

Sincerely,

Dave Kollasch
Notification Coordinator

enclosure

WI DNR Transportation Permit



STATE OF WISCONSIN DEPARTMENT OF NATURAL RESOURCES TRANSPORTATION SERVICE LICENSE

AUTHORIZED CONTACT:

JEREMY FUSSY, ENV COOR
CRI RECYCLING SERVICE INC
PO BOX 194
WOODVILLE, WI 54028

LICENSE NO: 14354
TYPE OF FACILITY: Recyclables Transporter
EFFECTIVE DATE: October 1, 2011
DATE OF EXPIRATION: September 30, 2012

LICENSEE: CRI RECYCLING SERVICE INC
NAME OF OPERATION: CRI RECYCLING SERVICE INC
LOCATION OF OPERATION:
101 HAGEN DR WOODVILLE
ST. CROIX COUNTY, STATE OF WISCONSIN

This license authorizes the licensee to operate the transportation service described above during the term specified, and is subject to and conditioned upon compliance with the provisions of chapter 287, and 289, Wis. Stats., and chapters NR 500-590, Wis. Adm. Code. Any exemptions from the requirements of chapters NR 500-590, Wis. Adm. Code, issued for this service are listed above.

Certificate of Insurance



CERTIFICATE OF LIABILITY INSURANCE

QPID: KK

DATE (MM/DD/YYYY)

02/27/12

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 Oils-Magic Insurance Agency, Inc., Suite 800 Missabe Bldg, P.O. Box 137 Duluth, MN 55801-0137 Robert H. Heimbach	218-722-7753 218-722-7756	CONTACT NAME: PHONE: FAX: ADDRESS: CARRIER: LICENSE NO.: CRIS-1	FAX: (N/A)
INSURED CRI Recycling Service, Inc. Brian King 101 Hagen Dr. Woodville, WI 54028		INSURERS AFFORDING COVERAGE	
		INSURER A:	Westchester Surplus Lines Ins
		INSURER B:	ACE Fire Underwriters Ins Co
		INSURER C:	WestBend Mutual Insurance Co.
		INSURER D:	
		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.

PKR LTR	TYPE OF INSURANCE	APOL (BURE USE ONLY)	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	GENERAL LIABILITY <input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS MADE <input checked="" type="checkbox"/> OCCUR <input checked="" type="checkbox"/>		G24082933034	02/27/12	02/27/13	EACH OCCURRENCE \$ 1,000,000 DAMAGE TO THIRD PARTY PROPERTY (Per occurrence) \$ 50,000 MED-EXP (Anyone person) \$ 5,000 PERSONAL & AUTO INJURY \$ 1,000,000 GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - CONSUMPT AGG \$ 2,000,000
B	AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS <input type="checkbox"/> NON-OWNED AUTOS		H08448181034	02/27/12	02/27/13	OPERATOR-DRIVER LIMIT (Excluded) \$ 1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per person) \$ PROPERTY DAMAGE (Per accident) \$
A	UMBRELLA LNB <input checked="" type="checkbox"/> OCCUR EXCESS LNB <input type="checkbox"/> CLAIMS MADE CROUFTABLE <input checked="" type="checkbox"/> RETENTION \$ None		G24082935034	02/27/12	02/27/13	EACH OCCURRENCE \$ 3,000,000 AGGREGATE \$ 3,000,000
C	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY EMPLOYER-EMPLOYEE (Per employee) Y/N N EMPLOYER-EMPLOYEE (Per employee) Y/N N EMPLOYER-EMPLOYEE (Per employee) Y/N N EMPLOYER-EMPLOYEE (Per employee) Y/N N EMPLOYER-EMPLOYEE (Per employee) Y/N N		777041180810 WI WORK COMP	03/03/12	03/03/13	<input checked="" type="checkbox"/> 100% EL EACH OCCUR \$ 1,000,000 EL DISEASE - EA EMPLOYEE \$ 1,000,000 EL DISEASE - POLICY LIMIT \$ 1,000,000
A	Pollution Liability		G24082935004	02/27/12	02/27/13	Each Occur 1,000,000 Aggregate 2,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (Attach ACORD 101, Additional Remarks Schedule, if more space is required)
Proof of Coverage

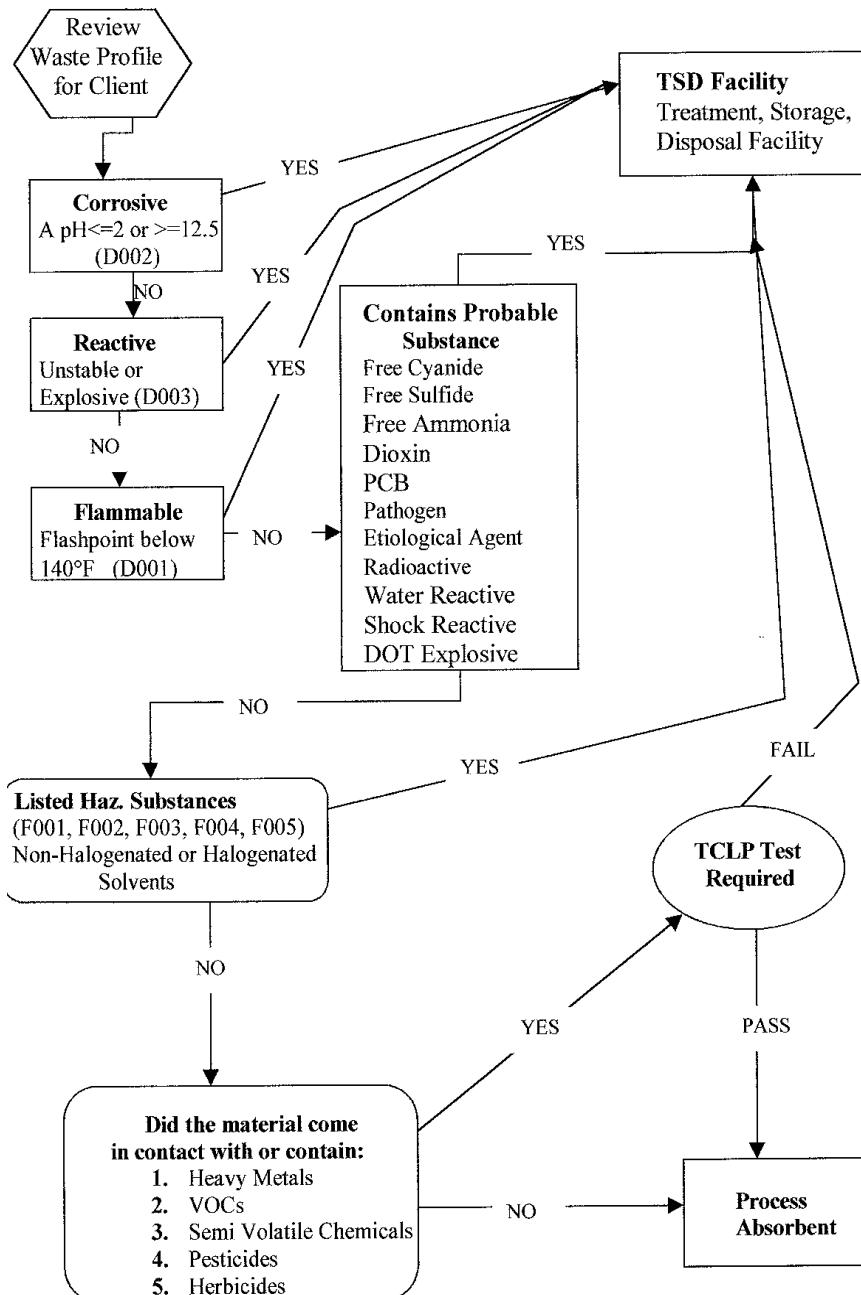
CERTIFICATE HOLDER BLANK 1 SERIAL # CERTIFICATE	CANCELLATION SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS. AUTHORIZED REPRESENTATIVE
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Waste Profile Analysis Flow Chart



CRI Recycling Service, Inc. Waste Profile Analysis Flow Chart



Material Survey



Generator Name _____

Type of Business _____ SIC Code _____

Address _____

Telephone Number _____ Fax Number _____

Representative _____

Federal EPA ID _____ Generator Status LQG SQG CESQG

WASTE INFORMATION

Waste Composition Information / Material Composition

General Amount _____ Number Drums _____ per Week Month Quarterly Yearly

Is this waste designated as a RCRA Hazardous Waste Yes No

DOT Proper Shipping Name _____

	Yes	No		Yes	No		Yes	No		Yes	No
Free Liquids	<input type="checkbox"/>	<input type="checkbox"/>	Free Cyanide	<input type="checkbox"/>	<input type="checkbox"/>	Free Sulfide	<input type="checkbox"/>	<input type="checkbox"/>	Free Ammonia	<input type="checkbox"/>	<input type="checkbox"/>
Oxides	<input type="checkbox"/>	<input type="checkbox"/>	Dioxins	<input type="checkbox"/>	<input type="checkbox"/>	Herbicides	<input type="checkbox"/>	<input type="checkbox"/>	Insecticides	<input type="checkbox"/>	<input type="checkbox"/>
Pesticides	<input type="checkbox"/>	<input type="checkbox"/>	Acids	<input type="checkbox"/>	<input type="checkbox"/>	Halogenated Solvents	<input type="checkbox"/>	<input type="checkbox"/>	Organic Solvents	<input type="checkbox"/>	<input type="checkbox"/>
Toxic Metals	<input type="checkbox"/>	<input type="checkbox"/>	Etiological Agents	<input type="checkbox"/>	<input type="checkbox"/>	PCB's	<input type="checkbox"/>	<input type="checkbox"/>	Virgin Oils	<input type="checkbox"/>	<input type="checkbox"/>
Bases	<input type="checkbox"/>	<input type="checkbox"/>	Pathogens	<input type="checkbox"/>	<input type="checkbox"/>	Radioactive	<input type="checkbox"/>	<input type="checkbox"/>	Water Reactive	<input type="checkbox"/>	<input type="checkbox"/>
Used Oils	<input type="checkbox"/>	<input type="checkbox"/>	DOT Explosive	<input type="checkbox"/>	<input type="checkbox"/>						
Shock Reactive	<input type="checkbox"/>	<input type="checkbox"/>									

ATTACHMENTS: Attach MSDS's for all material components and any current testing for the material.

TCLP Attached EP Toxic Attached MSDS Attached Other Attached No Attachment

Material Survey



The following are questions that relate to the waste streams or any components of the manufacturing process.

Halogenated Solvents- are solvents used in degreasing that contain tetrachloroethylene, methylene chloride, and carbon tetrachloride. Batch cold cleaning machines, water-covered tank cleaners, vapor degreasers, and other types of degreasers are some examples of possible sources of halogenated solvents.

Do you have any degreasers/parts washers on site? Yes No

If yes, is the degreaser located in an area where the absorbent is used, explain? _____

If the degreaser leaks or a spill is noticed how is the clean up process managed, explain? _____

Chlorinated Paraffins- are cutting fluids or other oils that contain a range of chlorine containing additives. Many of these are used in a variety of metalworking applications.

Do you work with any chlorinated paraffins or other chlorinated compounds? Yes No

If yes, would the oil absorbent ever come in contact with the compounds, explain? _____

Fuels and Volatile Organic Chemicals (VOC's)

Would the oil absorbent ever come in contact with any fuels such as gasoline or volatile organic chemicals (VOC's)? _____

Toxic Metals- range from the following: Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, and Silver. Lead and other heavy metals are sometimes used for stock in parts that are manufactured.

Do you use any toxic metals? Yes No

If yes, then does the parts come in contact with oil, coolant, or any, other liquid that the absorbent could uptake, explain? _____

Has there ever been a problem of toxic metals in the waste stream, explain? _____

Has any part of the waste stream ever been analyzed for hazardous waste, explain? _____

GENERATOR CERTIFICATION:

On behalf of the Generator, I hereby warrant, represent and certify that all of the information submitted in this document is true, accurate, and complete; all known or suspected hazards have been disclosed; and, I am an owner, operate or duly authorized employee of the Generator realize any subsequent changes to the absorbent material composition requires me to contract CRI Recycling Service, Inc. for re-evaluation. Generator agrees to indemnify and holds CRI Recycling Service, Inc. harmless for any damages, assessments, penalties, costs and attorneys fees, etc. arising out of, or in any way related to breach of the above warranty by the Generator.,

Representative Name: _____

Representative Signature _____ **Date:** _____