



COMPLIANCE PLUS
SERVICES, INC.

- STATEMENT OF QUALIFICATIONS -



*Premier Industry Provider of Engineering,
Environmental and Safety Services*

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I. Business Description

Compliance Plus Services (CPS) offers a wide array of quality engineering, environmental, and health & safety outsourcing services to industrial and commercial clients throughout the eastern United States.

Unlike many Engineering/Consulting firms, CPS utilizes a unique and cost-effective approach, forming a partnership with our clients to work beside them in order to create the best possible solutions for the management of their environmental and safety needs.

CPS takes pride in looking after their client's best interest first, and foremost, and not just seeking ways to increase billable hours. With this philosophy, CPS is able to offer affordable, reliable customized services that will develop into long-term relationships. This provides the necessary link between efficient management of your business and meeting your obligations to comply with today's complicated governmental regulations! CPS wants to be there to help fill the voids in our client's resources created by Corporate-downsizing of environmental and safety departments which has occurred in almost every organization in the United States.

By utilizing CPS, companies are able to tap into sources of highly trained and experienced professionals without having to incur the expense of hiring, training, managing and providing resources for a large in-house staff. CPS does this for you! We take great efforts to keep our staff up to date with the ever-changing landscape of environmental and occupational safety services. You can even use CPS as an in-house resource to oversee/manage the activities of your primary engineering/consulting firm.

CPS is dedicated to meeting its customer's business needs and goals. Our goal is to take the worry out of your environmental and safety compliance management and allow you to focus your time and resources back into your company's principal business lines.

II. Company Profile

CPS services the eastern regional, mid-Atlantic corridor, stretching from Virginia to Maine and as far west as Michigan. Our trained professionals have years of experience with environmental permitting, regulatory requirements and compliance auditing in more than twenty states across the U.S. In addition, Compliance Plus Services' reputation with the various state and federal regulators is surpassed by none.





One of our primary focuses has been compliance and permitting for hazardous and solid waste processing and disposal facilities as well as a number of hazardous waste transporters. Our personnel have worked for several large environmental companies that own treatment, storage and disposal facilities (TSDF) throughout the United States and Canada. More recently, CPS has assisted a number of waste management facilities whose primary function is to find innovative ways to recycle wastes and recover natural resources.

Compliance Plus Services' success is a result of a powerful combination of technical experience, regulatory knowledge, and local presence. CPS is distinctively qualified to evaluate and respond to today's complex engineering and environmental projects.

CPS has established long-term contracts to act as the sole source provider of environmental and safety management services to several major environmental services firms in the Northeast area. In this capacity we provide a number of services including:

- ✓ **Routine independent auditing service of the various satellite facility operations;**
- ✓ **Providing the firms with the required operation and management assistance for environmental permitting;**
- ✓ **Providing turnkey support services for major facility capital construction projects (i.e. permitting, developing operation procedures, training & instruction);**
- ✓ **As well as technical support and regulatory update services on new regulatory compliance requirements.**

Whether Compliance Plus Services is providing long-term regulatory outsourcing services or performing a one-time waste minimization audit for a small quantity generator, our goal is always to provide high quality, reliable services to our clients.





III. Markets and Services

A. Regulatory Compliance Assistance/Consulting

Compliance Plus Services' primary goal is to offer its clients the opportunity to outsource their environmental compliance services to an experience and reliable provider at a reasonable cost. CPS can provide regulatory consultation and support to assist our clients with both new and existing regulations as well as acting as a negotiator with the federal, state and local official on permitting or enforcement issues. Our services also include the availability of onsite implementation assistance.

B. Environmental Permitting and Reporting Services

CPS can prepare a wide variety of permits and reports for submission to federal, state and local agencies - with guaranteed accuracy, and in compliance with the newest required electronic formats. CPS routinely completes and files a variety of environmental reports for its existing clients including:

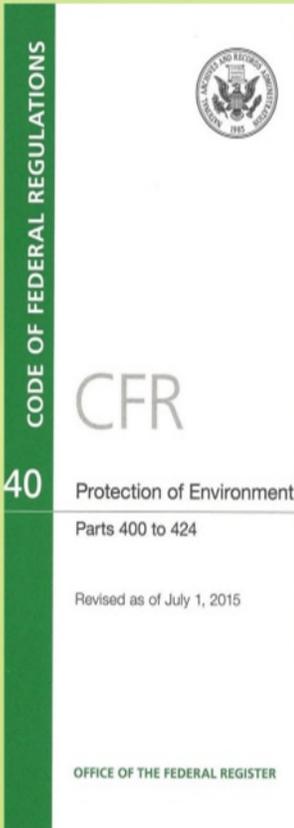
- ✓ **EPA biennial waste reports**
- ✓ **Annual state required reports**
- ✓ **Completing spill/release reporting under U.S. DOT, EPA, SARA Title III and EPA RCRA requirements**
- ✓ **Annual waste minimization**
- ✓ **Groundwater monitoring or corrective action reports**
- ✓ **SARA Title III, TIER II, and TRI (Form R) report**
- ✓ **Discharge monitoring reports**

We pride ourselves on having an extensive background in the hazardous waste industry particularly relevant to transportation and disposal facility permitting issues.

CPS can also provide record management and storage/retrieval services for our clients for all of their various environmental reports and records. This helps our customers stay prepared for audits/inspections from any government agencies.

C. Regulatory Compliance Audits

Our staff can provide comprehensive environmental and safety auditing for any size industrial or commercial client regardless of size. Our inspectors will review all areas of the facility for compliance with: RCRA storage requirements, container and tank labeling procedures, waste minimization, waste tracking, documentation procedures, spill prevention/contingency measures,



security/emergency response measures, sampling/analysis procedures, waste compatibility and cross contaminated issues. This inspection is key in evaluating management efficiencies and identifying hazardous or dangerous practices while keeping the client in compliance with all applicable local, state, and federal regulatory provisions.



D. Brownfield Site Evaluation & Development

CPS has experience performing "Brownfield Redevelopment" programs for various clients. These projects are designed to redevelop potential contaminated abandoned industrial sites into viable commercial and industrial properties. This transformation process increases the actual property value while aiding in the elimination of potential environmental concerns on the properties.

Recent regulatory legislation has been highly promoting of this type of redevelopment.

E. Technical Support Services

Compliance Plus Services offers a wide variety of technical support services that are also tailored to each client's individual needs.

1. **Waste Management Review and Consultation**

Our review and consultation services include: review of waste classification records & documentation (including sample analysis review), checks on daily/weekly/monthly inspection requirements for waste generation & storage units, review compliance with applicable Land Disposal Restriction regulations, waste analysis requirements, record keeping procedures, evaluation of compliance with contingency and emergency response procedure requirements, evaluation of compliance with federal waste minimization standards, review of present

disposal facility compliance with applicable regulations, and assessment of present disposal methods.

CPS has a wide range of experience in these areas and has the advantage of having conducted compliance auditing services at a number of different waste management facilities.

2. Preparation of Sampling Investigation and Analytical Plan

Our expert staff can also provide analytical review services to ensure that our clients are properly classifying their waste for disposal and/or recycling. Analytical testing can become overbearing when trying to decipher exactly what testing should be completed for each individual waste stream. CPS can eliminate this confusion by developing a waste classification and sampling strategy to collect representative samples for proper classification. We can also develop field sampling investigation and analysis plan for required remedial action and formulate the essential work plan for the actual remedial clean-up work.

CPS will also review the return documentation on behalf of our client to ensure proper classification of the material, and offer possible alternate options for these wastes.



3. Source Reduction/Waste Minimization Program Development

CPS can review a Client's waste management and waste minimization practices and provides recommendations for cost saving management options based on years of experience at end-supplier treatment and disposal facilities. Our firm also maintains relationships with a wide network of service providers of waste management, transportation and disposal services.

4. Total Quality Environmental Management Systems (TQEM)

This service includes audits which encompass the guiding principles of the ISO 9000 and ISO 14000 standards. By applying these standards, our Clients are able to set objectives for continuous improvement in their product quality and reliability, no matter what that product is. Ultimately, these commitments to TQEM have consistently been shown to improve the company's bottom line due to removal of inefficiencies and increased product confidence by the consumer.



F. Pre-purchase Due Diligence Investigation

Due diligence investigation is a critical part of any business acquisition. Our team has performed numerous due diligence investigations for large environmental firms. These investigations are crucial for the perspective buyer to identify both current and past environmental issues or concerns that may need to be addressed and negotiated prior to the actual closing. These investigative tools also assist in providing a smooth transition after the transaction is completed. Accordingly, companies are able to avoid unforeseen expenditures related to past business practices.

G. Engineering Services



- ✓ **Environmental Engineering**
- ✓ **Air Quality Management**
- ✓ **Wastewater Management**
- ✓ **Solid Waste Management**
- ✓ **Mining & Mineral Processing Management**
- ✓ **Water Quality Compliance/Permitting**
- ✓ **Geology & Hydrogeology**
- ✓ **Groundwater Modeling**
- ✓ **Remediation and Closure Services**
- ✓ **Geophysical Services**
- ✓ **Operation Management Plan**
- ✓ **Facility Siting & Design**
- ✓ **Aboveground/Underground Tank Management Services**
- ✓ **Computer Aided Drafting Services**

H. Health & Safety Training

1. Customized Employee Training Programs for OSHA, EPA, and U.S. DOT

Compliance Plus Services can provide clients with cost-effective employee training in a wide variety of topics, from hazard communication classes to OSHA 40-hour HAZWOPER training. Our certified staff can customize the training courses for each client, highlighting areas which are more prevalent to their industry. These programs include the following:

OSHA Training -

- ✓ 40 Hour HAZWOPER
- ✓ 24 Hour HAZWOPER
- ✓ 8 Hour Annual Refresher
- ✓ 8 Hour Supervisor Training
- ✓ Stormwater Pollution Prevention
- ✓ Forklift Operation
- ✓ Confined Space Training
- ✓ Blood Borne Pathogens
- ✓ Lockout/Tagout
- ✓ Workplace Violence
- ✓ Accident Investigation
- ✓ Hazardous Communication
- ✓ Ergonomics
- ✓ Electrical Safety
- ✓ Fire Extinguisher
- ✓ Hearing Protection
- ✓ Laboratory Safety
- ✓ Respiratory Protection
- ✓ Laboratory Chemical/Hygiene
- ✓ 10 Hour Construction Worker Certification
- ✓ 30 Hour Construction Worker Certification



Other Training

- ✓ DOT Shipper/Transporter Hazardous Materials Training (49CFR172.700 & 177.800)
- ✓ First Aid & CPR Responder Training

Emergency Response

- ✓ Awareness Level
- ✓ Operations Level
- ✓ Technician
- ✓ Incident Commander

2. Facility Health and Safety Program Inspections

Facility health and safety inspections are completed to ensure that the operation is in compliance with all OSHA regulations. Employee training certificates, medical documentation, emergency response plans and contingency plans are all reviewed. It also gives our clients an outside perspective on potential health and safety hazards present in their facility.



3. Risk Management Surveys

CPS can conduct risk management evaluations for its Clients to determine where their company liabilities must be minimized. CPS provides comprehensive recommendations based on the surveys to identify and rank the changes that should be made to address any concerns.

4. Industrial Hygiene Monitoring Programs

CPS can provide various industrial hygiene services, including: chemical exposure monitoring; audiometric surveys; ventilation system evaluations; as well as indoor air quality evaluations. These evaluations and surveys are key to many Clients understanding and addressing their greatest liabilities as employers.

5. Employee Medical Monitoring Programs

CPS can establish a medical monitoring program in accordance with all OSHA & DOT requirements. Our personnel will detail what specific medical monitoring program is required for each employee based on their job description (i.e., hazardous waste truck drivers require specific DOT testing & clearance). This program will also include random drug screening and annual physicals if necessary.

I. Customized Computer Tracking Systems

CPS offers the development and implementation of customized waste computer tracking systems for complying with proper documentation and record management requirements for hazardous and residual wastes. These tracking systems are designed to offer an increased level of information and waste tracking capabilities to satisfy each Client's particular requirements. This program includes file maintenance systems for all of clients' vendors and customers.



IV. Client References

The following is a summary list of some of the corporate clients which CPS has completed projects for or has long-term service contracts in place. If further specific references are required, please contact our support staff.

- ✓ Philip Services Corp
- ✓ Clean Earth, Inc.
- ✓ Caddick Construction
- ✓ Environmental Waste Minimization, Inc.
- ✓ Herman’s Trucking, Inc.
- ✓ Republic Environmental Systems, Inc.
- ✓ Horwith Transportation Services, Inc.
- ✓ Allstate Power Vac
- ✓ Port Contractors, Inc.
- ✓ Mercer Group International
- ✓ Covanta
- ✓ Cycle Chem
- ✓ Envirite Corp.
- ✓ Diamond Materials, Inc.
- ✓ R.E. Pierson
- ✓ Jay Cashman, Inc.
- ✓ Reger, Rizzo, & Darnell
- ✓ MAGCO Corporation
- ✓ EQ Terminal Services, LLC
- ✓ Ashland Research Center
- ✓ Cape Mining & Recycling, Inc.
- ✓ JRBG Resource Management, LLC





V. Contact Information



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