



December 2, 2011

**BY CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Rick George
Chief Executive Officer
Suncor Energy, Inc.
PO Box 2844
150 – 6 Avenue S.W.
Calgary, Alberta
Canada T2P 3E3

John Gallagher
Vice President Refining
Suncor Energy USA, Inc.
717 17th St., Suite 2900
Denver, CO 80202

Jay Christopher
Environmental Manager
Suncor Energy USA, Inc.
Commerce City Refinery
5801 Brighton Blvd.
Commerce City, CO 80022

**Re: Notice of Intent to File Suit Under the Clean Water Act and Clean Air Act, Oil Spill
from Suncor Denver Refinery**

Dear Messrs. George, Gallagher, and Christopher:

Pursuant to the citizen suit provision of the Clean Water Act, 33 U.S.C. § 1365(a)(1), and the Clean Air Act, 42 U.S.C. § 7604(a)(1), WildEarth Guardians hereby provides you notice that we intend to file suit against Suncor Energy, Inc. and Suncor Energy USA, Inc. (hereafter we refer to both entities as “Suncor”) over ongoing violations of the Clean Water Act and Clean Air Act at the company’s Commerce City Oil Refinery located in Adams County, Colorado related to an ongoing oil spill into Sand Creek, a tributary of the South Platte River.

In accordance with the Clean Water Act, 33 U.S.C. § 1365(b)(1), and the Clean Air Act, 42 U.S.C. § 7604(b)(1)(A), in sixty days, or shortly thereafter, we intend to file suit against

Suncor and seek appropriate injunctive relief, declaratory relief, and other relief that may be provided as necessary to remedy these ongoing violations under the Clean Water Act and Clean Air Act.

Pursuant to 40 C.F.R. §§ 53.2 and 135.2(c), this notice is being served via certified mail to the owner or managing agent the building, plant, installation, or facility in violation, with copies concurrently sent to the registered agent of Suncor USA, Inc., the Administrator of the U.S. Environmental Protection Agency (“EPA”), the Region 8 Administrator of the EPA, the Director of the Colorado Water Quality Control Division, the Director of the Colorado Air Pollution Control Division, and the Colorado Governor.

I. The Source

The Commerce City Oil Refinery is located at 5800 Brighton Boulevard in Commerce City, Colorado. According to Suncor, the refinery processes 93,000 barrels per day of oil, producing gasoline, distillates, and paving grade asphalt. The refinery releases air pollution into the airshed of the Denver metropolitan area and discharges water pollution into Sand Creek, a tributary to the South Platte River.

The refinery has a sordid environmental compliance history. According to the Environmental Protection Agency’s (“EPA’s”) Environment and Compliance History Online (“ECHO”) database, the refinery has been in violation of clean air laws at least for the last three years. *See* Exhibit 1, EPA, Suncor Energy Commerce City Refinery Detailed Facility Report, available at <http://www.epa-echo.gov/cgi-bin/get1cReport.cgi?tool=echo&IDNumber=110015848813> (last accessed Dec. 1, 2011). Ongoing violations are still “unaddressed.” The facility is a High Priority Violator according to the EPA. The facility has violated clean water laws on numerous occasions over the years. According to the ECHO database, the facility violated clean water laws between January and March of 2009 and July 2010 and March 2011.

The refinery releases nearly 70,000 pounds of toxic substances in the form of air pollution, water pollution, and waste disposal. These releases include 23,919 pounds of hexane into the air, 16,870 pounds of nitrates into the water, and 29 pounds of lead. *See* Exhibit 2, EPA, Toxic Release Inventory Data for Suncor Energy Commerce City Refinery, available at http://oaspub.epa.gov/enviro/tris_control.tris_print?tris_id=80022CNCDN5801B (last accessed Dec. 1, 2011).

On or around November 28, 2011, Suncor reported a discharge into Sand Creek that emanated from its Commerce City Refinery property. *See* Exhibit 3, Finley, B., “Health department: Pipe may have broken a half mile from Sand Creek spill site,” *Denver Post* (Nov. 30, 2011). The discharge was reported to have resulted from a plume migrating from Suncor’s refinery, under property owned by Metro Wastewater, and into Sand Creek and ultimately the South Platte River. News reports indicate the discharge consists of hazardous substances, such as volatile organic compounds (“VOCs”), including benzene, which have also been released into the air and produced foul odors. Regulators have stated that a broken underground pipe that runs between a storage tank and the refinery on Suncor’s property is the most likely source of the

discharge. Although the discharge was reported on or around November 28, 2011, regulators have indicated that the break in the pipe “happened quite some time ago.” See Exhibit 4, Finley, B., “Black gunk leaking into Sand Creek and South Platte contains cancer-causing benzene, EPA tests show,” *Denver Post* (Dec. 1, 2011).

The discharge has prompted a major clean up effort of Sand Creek and the South Platte River, but latest reports indicate the discharge has not ceased. Reports also indicate that air pollution associated with the spill has not been controlled.

II. The Violations

Suncor’s recent discharges from its Commerce City Refinery into Sand Creek violate a number of state and federal Clean Water Act and Clean Air Act provisions that are enforceable by citizens. We hereby provide notice that Suncor is specifically violating the following requirements as explained below:

- Failure to obtain National Pollutant Discharge Elimination System (“NPDES”) permit, Violation of federal Clean Water Act and implementing regulations: The Clean Water Act and its implementing regulations applicable to state permitting program state that it is unlawful to discharge pollutants from a point source to navigable waters without obtaining and complying with a permit governing the quantity and quality of discharge. The Clean Water Act specifically prohibits “the discharge of any pollutants by any person...” except in compliance with, among other sections of the Clean Water Act, the National Pollutant Discharge Elimination System permitting requirements set forth under Section 1342 of the Act. 33 U.S.C. § 1311(a). The duty to apply for an NPDES permit extends to “[a]ny person who discharges or proposes to discharge pollutants...” 40 C.F.R. § 122.21(a).

The term “discharge of pollutants” means “any addition of any pollutant to navigable waters from any point source.” 33 U.S.C. § 1362(12). Pollutants are defined to include, among other things, “solid waste,” “garbage,” “chemical wastes,” and “industrial...waste.” 33 U.S.C. § 1362(6). A point source is defined as “any discernable, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel [or] conduit...from which pollutants are or may be discharged.” 33 U.S.C. § 1362(14). “Navigable waters” means “the waters of the United States.” 33 U.S.C. § 1362(7).

Here, the ongoing release of hazardous materials, whether from a pipe or other discrete conveyance, on the property of Suncor’s Commerce City Refinery into Sand Creek constitutes a discharge of pollutants from a point source into a navigable water. The hazardous materials are pollutants within the meaning of the Clean Water Act and given that they are being added to Sand Creek, they are being discharged. The pipe, or other discrete conveyance, in this case constitutes a point source. Furthermore, Sand Creek is a navigable water. Despite this, Suncor does not have an NPDES permit for this discharge and has not applied for such a permit, in violation of 33 U.S.C. § 1311(a) and 40 C.F.R. § 122.21(a).

- Failure to obtain Colorado Discharge Permit System permit, Violation of Colorado Water Quality Control Act and Water Quality Control Commission (“WQCC”) Regulations: The

State of Colorado has a permitting system similar to the federal Clean Water Act and indeed the EPA has approved Colorado's permitting system as consistent with the Clean Water Act in accordance with 40 C.F.R. § 123. Similar to the federal Clean Water Act, the Colorado Water Quality Control Act prohibits the "discharge [of] any pollutant into any state water from a point source without first having obtained a permit...for such discharge." C.R.S. 25-8-501(1). Accordingly, WQCC regulations also prohibit any person from discharging "any pollutant into any state water from a point source without first having obtained a permit from the [Water Quality Control] Division for such discharge[.] WQCC Regulation No. 61, Section 61.3(1)(a).

Similar to the Clean Water Act, the Colorado Water Quality Control Act defines "discharge of pollutants" as "the introduction or addition of a pollutant into state waters." C.R.S. 25-8-103(3). Pollutants are defined to include, among other things, "solid waste," "garbage," "chemical waste," and "industrial...waste." C.R.S. 25-8-103(15). A point source is defined as "any discernable, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel [or] conduit...from which pollutants are or may be discharged." C.R.S. 25-8-103(14). "State waters" means "any and all surface and subsurface waters which are contained in or flow in or through this state." C.R.S. 25-8-103(19).

Here, the ongoing release of hazardous materials from a pipe, or other discrete conveyance, on the property of Suncor's Commerce City Refinery into Sand Creek constitutes a discharge of pollutants from a point source into a state water. The hazardous materials are pollutants within the meaning of the Colorado Water Quality Control Act and given that they are being added to Sand Creek, they are being discharged. The pipe, or other discrete conveyance, in this case constitutes a point source. Furthermore, Sand Creek is a state water as it is located in Colorado. Despite this, Suncor does not have a Colorado Discharge Permit for this discharge and has not applied for such a permit, in violation of C.R.S. 25-8-501(1) and WQCC Regulation No. 61, Section 61.3(1)(a).

- Failure to control VOC emissions, Violation of Title V Permit: The federal Clean Air Act requires major stationary sources of air pollution to comply with an operating permit issued pursuant to Title V of the Act. *See* 42 U.S.C. § 7661a(1). The State of Colorado has been granted authority to issue operating permits pursuant to Title V of the Clean Air Act. Suncor obtained operating permits most recently from the Colorado Air Pollution Control Division for the eastern portion of its Commerce City Refinery in 2009 and the western portion of its Commerce City Refinery in 2006. *See* Air Pollution Control Division Operating Permits No. 95OPAD108 and No. 96OPAD120, available at <http://www.cdphe.state.co.us/ap/download/AD108p02.pdf> and <http://www.cdphe.state.co.us/ap/download/ad120p02.pdf>. Both operating permits state that "The permittee shall not dispose of volatile organic compounds by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized." Operating Permit No. 95OPAD108, Section IV, Condition 29(b) and Operating Permit No. 96OPAD120, Section IV, Condition 29(b). RACT is defined under Colorado Air Quality Control Commission ("AQCC") Common Provisions Regulation as, "Technology that will achieve the maximum degree of emission control that a particular source is capable of meeting and that is reasonably achievable considering technological and economic feasibility." AQCC Common

Provisions Regulation, Section I.G.

Here, Suncor has disposed of VOCs through evaporation without utilizing reasonably available control technology. The discharge of hazardous materials has reportedly led to VOC emissions, including benzene emissions, through evaporation. However, Suncor did not use reasonable controls that are technologically and economically feasible to limit emissions or otherwise achieve the maximum degree of emission control that the source is capable of meeting. Of particular concern is that it appears that Suncor has not turned off the flow to the leaking pipeline in order to prevent further disposal of VOCs through evaporation or otherwise taken other technologically and economically feasible steps to limit the release of VOC emissions, in violation of its Clean Air Act operating permits.

III. The Citizen Suit Provisions of the Clean Water Act and Clean Air Act

Under the Clean Water Act, any person may file suit in federal court against any other person “alleged to be in violation of...an effluent standard or limitation[.]” 33 U.S.C. § 1365(a)(1). The phrase “effluent standard or limitation” is broadly defined under the Clean Water Act and includes, but is not limited to, “an unlawful act under subsection (a) of section 1311 of this title[.]” 33 U.S.C. § 1365(f). Section 1311(a) prohibits the discharge of pollutant except in compliance with the NPDES provisions of Section 1342 of the Clean Water Act, as well as any EPA approved state NPDES permitting program, such as the Colorado Discharge Permit System. *See* 33 U.S.C. § 1342(b).

Under the Clean Air Act, any person may file suit in federal court against any other person alleged to “have violated (if there is evidence that the alleged violation has been repeated) or to be in violation of...an emission standard or limitation under this Act[.]” 42 U.S.C. § 7604(a)(1)(A). The phrase “emission standard or limitation” is broadly defined under the Clean Air Act and includes, but is not limited to, “any...standard, limitation, or schedule established under any permit issued pursuant to title V[.]” 42 U.S.C. § 7604(f)(4).

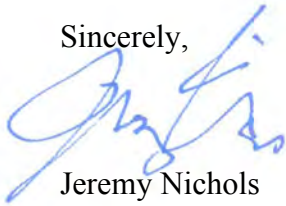
As explained above, on or around November 28, 2011, Suncor has been illegally discharging pollutants from its Commerce City Refinery and into Sand Creek without the required permit, in violation of the Clean Water Act, and related to this discharge, illegally disposing of VOCs through evaporation, in violation of the Clean Air Act. If these violations cannot be resolved within 60 days, WildEarth Guardians intends to file suit against Suncor to enforce the Clean Water Act and Clean Air Act. Pursuant to both the citizen suit provisions of the Clean Water Act and Clean Air Act, WildEarth Guardians intends to seek declaratory and injunctive relief, the assessment of civil penalties, recover costs and fees, and any other relief that may be appropriate.

IV. Conclusion

Further investigation is likely to reveal additional violations of the Clean Water Act and Clean Air Act related to the discharge of hazardous materials from the pipe, or other discrete conveyance, at the Commerce City Refinery. WildEarth Guardians hereby retains the right to enforce any and all additional violations uncovered after the date of this notice letter.

Contact information for WildEarth Guardians is listed below. If you have questions regarding these allegations, believe that any of the above information is in error, or would like to discuss a settlement of this matter prior to the initiation of litigation, please contact WildEarth Guardians at the information below.

Sincerely,



Jeremy Nichols
Climate and Energy Program Director
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Cc by certified mail, return receipt requested:

Registered Agent
Suncor Energy USA Inc.
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John Hickenlooper
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Paul Tourangeau
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James Martin
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Lisa Jackson
Administrator
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Washington, D.C. 20460

Exhibit 1

EPA, Suncor Energy Commerce City Refinery Detailed Facility Report, available at <http://www.epa-echo.gov/cgi-bin/get1cReport.cgi?tool=echo&IDNumber=110015848813>



Enforcement & Compliance History Online (ECHO)

You are here: [EPA Home](#) [Compliance and Enforcement](#) [ECHO](#) [Search Data](#) Search Results

Detailed Facility Report



Report Error

Data Dictionary

For Public Release - Unrestricted Dissemination Report Generated on 12/02/2011
 US Environmental Protection Agency - Office of Enforcement and Compliance Assurance

Gray text in this report indicates information that is not required to be reported to EPA. These data, typically regarding non-major or smaller facilities, are often incomplete.

Facility Permits and Identifiers

[Data Dictionary](#)

Statute	System	Source ID	Facility Name	Street Address	City	State	Zip
	FRS	110015848813	SUNCOR ENERGY COMMERCE CITY REFINERY	5801 BRIGHTON BOULEVARD	COMMERCE CITY	CO	80022
TSCA	TSCA	100602281					
CAA	AFS	0800100003	SUNCOR ENERGY - DENVER REFINERY	5801 BRIGHTON BLVD	COMMERCE CITY	CO	80022
CWA	ICP	COG600174	SUNCOR ENERGY (U.S.A.), INC.	5801 BRIGHTON BOULEVARD	COMMERCE CITY	CO	80022
CWA	ICP	COG604005	COMMERCE CITY PIPELINE TESTING	5801 BRIGHTON BLVD	COMMERCE CITY	CO	80022
CWA	ICP	CO0001147	SUNCOR ENERGY (USA) INC	5801 BRIGHTON BLVD	COMMERCE CITY	CO	80022
CAA	NEI	NEI889	Suncor Energy USA - Commerce City (prev. Conoco Inc.)			CO	80022
CAA	NEI	NEI889	Suncor Energy USA - Commerce City (prev. Conoco Inc.)			CO	80022
RCRA	RCR	COD060627189	SUNCOR ENERGY (USA) COMMERCE CITY REFINERY	5801 BRIGHTON BLVD	COMMERCE CITY	CO	80022
RCRA	RCR	COT090011420	HUXTABLE-HAMMOND CO INC	5801 BRIGHTON BLVD	COMMERCE CITY	CO	80022
EP313	TRI	80022CNCNDN5801B	SUNCOR ENERGY COMMERCE CITY REFINERY	5801 BRIGHTON BLVD	COMMERCE CITY	CO	80022

Facility Characteristics

[Data Dictionary](#)

Statute	Source ID	Universe	Status	Areas	Permit Expiration Date	Latitude/ Longitude	Indian Country?	SIC Codes	NAICS Codes
	110015848813					LRT: 39.805556 , - 104.944444	No		
		Major (Fed.)		MACT (SECTION 63					

CAA	0800100003	Rep.)	Operating	NESHAPS), TITLE V PERMITS , SIP , PSD , NESHAP			NA	2911	324110
CWA	COG600174	Minor; General Permit Covered Facility	Terminated ; Compliance Tracking Off		07/31/2006	39.803333, - 104.945556	No	4922	
CWA	COG604005	Minor; General Permit Covered Facility	Effective		12/31/2012	39.803333, - 104.945556	No	1629	
CWA	CO0001147	Major; NPDES Individual Permit	Admin Continued		10/31/2011	39.803333, - 104.945556	No	2911	
RCRA	COD060627189	TSDf LQG	Active (HPA)			39.8033 , -104.9455	No	2911	32411
RCRA	COT090011420		Inactive				No		
EP313	80022CNCNDN5801B					39.8033 , -104.9455	NA	2911 5171	324110 424710

If the CWA permit is past its expiration date, this normally means that the permitting authority has not yet issued a new permit. In these situations, the expired permit is normally administratively extended and kept in effect until the new permit is issued.

For the RCRA program, activities that contribute to an overall facility status of Active are displayed in parentheses using the acronym HPACS, where H indicates handler activities, P - permitting, A - corrective action, C - converter, and S - state-specific. More information is available in the Data Dictionary.

Inspection and Enforcement Summary Data

[Data Dictionary](#)

Statute	Source ID	Insp. Last 05Yrs	Date of Last Inspection	Formal Enf Act Last 05 Yrs	Penalties Last 05 Yrs
CAA	0800100003	6	05/17/2010	4	\$344,668
CWA	COG600174	1	05/16/2007	0	\$00
CWA	COG604005	0	Never	0	\$00
CWA	CO0001147	3	08/12/2010	0	\$00
RCRA	COD060627189	18	07/28/2011	1	\$00
RCRA	COT090011420	0	Never	0	\$00

Compliance Monitoring History (05 years)

[Data Dictionary](#)

Statute	Source ID	System	Inspection Type	Lead Agency	Date	Finding
CAA	0800100003	AFS	STATE/LOCAL CONDUCTED FCE/ON-SITE	State	08/06/2007	
CAA	0800100003	AFS	TV COMPLIANCE CERTIFICATION REVIEW BY S	State	09/06/2007	Result=IN COMPLIANCE ; Deviations=N
CAA	0800100003	AFS	STATE/LOCAL PCE/OFF-SITE	State	04/06/2007	
CAA	0800100003	AFS	STATE/LOCAL REQ (O/O) STACK TEST/NOT OB	State	05/25/2007	Result=STACK TEST PASSED ; Pollutant=CO
CAA	0800100003	AFS	STATE/LOCAL REQ (O/O) STACK TEST/NOT OB	State	05/25/2007	Result=STACK TEST PASSED ; Pollutant=CO
CAA	0800100003	AFS	TV COMPLIANCE CERTIFICATION REVIEW BY S	State	09/06/2007	Result=IN COMPLIANCE ; Deviations=N
CAA	0800100003	AFS	TV COMPLIANCE CERTIFICATION REVIEW BY S	State	09/03/2008	Result=IN VIOLATION ; Deviatiions=N
CAA	0800100003	AFS	STATE/LOCAL CONDUCTED FCE/ON-SITE	State	05/22/2008	
CAA	0800100003	AFS	OWNER/OPERATOR-CONDUCTED SOURCE TEST	State	11/16/2007	Result=STACK TEST FAILED ; Pollutant=VOC
CAA	0800100003	AFS	STATE/LOCAL CONDUCTED FCE/ON-SITE	State	05/19/2009	

CAA	0800100003	AFS	OWNER/OPERATOR-CONDUCTED SOURCE TEST	State	06/27/2008	Result=STACK TEST PASSED ; Pollutant=VOC
CAA	0800100003	AFS	TV COMPLIANCE CERTIFICATION REVIEW BY S	State	09/04/2009	Result=IN VIOLATION ; Deviations=N
CAA	0800100003	AFS	TV COMPLIANCE CERTIFICATION REVIEW BY S	State	09/03/2008	Result=IN VIOLATION ; Deviations=N
CAA	0800100003	AFS	OWNER/OPERATOR-CONDUCTED SOURCE TEST	State	06/27/2008	Result=STACK TEST PASSED ; Pollutant=NO2
CAA	0800100003	AFS	OWNER/OPERATOR-CONDUCTED SOURCE TEST	State	06/27/2008	Result=STACK TEST PASSED ; Pollutant=CO
CAA	0800100003	AFS	OWNER/OPERATOR-CONDUCTED SOURCE TEST	State	12/13/2007	Result=STACK TEST FAILED ; Pollutant=VOC
CAA	0800100003	AFS	OWNER/OPERATOR-CONDUCTED SOURCE TEST	State	03/13/2008	Result=STACK TEST FAILED ; Pollutant=VOC
CAA	0800100003	AFS	STATE/LOCAL PCE/ON-SITE	State	05/19/2008	
CAA	0800100003	AFS	STATE/LOCAL PCE/ON-SITE	State	08/10/2007	
CAA	0800100003	AFS	STATE/LOCAL REQ (O/O) STACK TEST/NOT OB	State	03/24/2009	Result=STACK TEST PASSED ; Pollutant=NO2
CAA	0800100003	AFS	STATE/LOCAL REQ (O/O) STACK TEST/NOT OB	State	03/24/2009	Result=STACK TEST PASSED ; Pollutant=CO
CAA	0800100003	AFS	STATE/LOCAL CONDUCTED FCE/ON-SITE	State	05/17/2010	
CAA	0800100003	AFS	TV COMPLIANCE CERTIFICATION REVIEW BY S	State	09/04/2009	Result=IN VIOLATION ; Deviations=N
CAA	0800100003	AFS	STATE/LOCAL CONDUCTED FCE/ON-SITE	State	05/19/2009	
CAA	0800100003	AFS	STATE/LOCAL REQ (O/O) STACK TEST/NOT OB	State	11/17/2009	Result=STACK TEST PASSED ; Pollutant=PT
CAA	0800100003	AFS	TV COMPLIANCE CERTIFICATION REVIEW BY S	State	09/07/2010	Result=IN VIOLATION ; Deviations=N
CAA	0800100003	AFS	STATE/LOCAL PCE/ON-SITE	State	08/15/2011	
CAA	0800100003	AFS	STATE/LOCAL CONDUCTED FCE/ON-SITE	State	05/17/2010	
CAA	0800100003	AFS	OWNER/OPERATOR-CONDUCTED SOURCE TEST	State	10/21/2010	Result=STACK TEST PASSED ; Pollutant=PT
CAA	0800100003	AFS	STATE/LOCAL PCE/ON-SITE	State	08/15/2011	
CAA	0800100003	AFS	OWNER/OPERATOR-CONDUCTED SOURCE TEST	State	09/29/2011	Result=STACK TEST PASSED ; Pollutant=PT
CAA	0800100003	AFS	EPA PCE/OFF-SITE	EPA	03/11/2010	
TSCA / §6	600058263	ICIS	PCB	EPA	06/04/2007	
CWA / §311	1800029370	ICIS	Evaluation	EPA	08/20/2009	
CWA / §311	1800029389	ICIS	Evaluation	EPA	08/20/2009	
CWA	COG600174	ICP	Evaluation (CEI); NPDES - Base Program	State	05/16/2007	
CWA	CO0001147	ICP	Evaluation (CEI); NPDES - Base Program	State	05/16/2007	
CWA	CO0001147	ICP	Evaluation (CEI); NPDES - Base Program	State	07/24/2008	
CWA	CO0001147	ICP	Evaluation (CEI); NPDES - Base Program	State	08/12/2010	
RCRA	COD060627189	RCR	FOCUSED COMPLIANCE INSPECTION	State	01/05/2007	No Violations Or Compliance Issues Were Found
RCRA	COD060627189	RCR	CORRECTIVE ACTION COMPLIANCE EVALUATION	State	03/21/2007	No Violations Or Compliance Issues Were Found
RCRA	COD060627189	RCR	OPERATION AND MAINTENANCE INSPECTION	State	03/21/2007	No Violations Or Compliance Issues Were Found

RCRA	COD060627189	RCR	FOCUSED COMPLIANCE INSPECTION	State	04/04/2007	Violations Or Compliance Issues Were Found
RCRA	COD060627189	RCR	FOCUSED COMPLIANCE INSPECTION	State	04/05/2007	No Violations Or Compliance Issues Were Found
RCRA	COD060627189	RCR	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	10/17/2007	Violations Or Compliance Issues Were Found
RCRA	COD060627189	RCR	FOCUSED COMPLIANCE INSPECTION	State	10/30/2007	No Violations Or Compliance Issues Were Found
RCRA	COD060627189	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/07/2007	No Violations Or Compliance Issues Were Found
RCRA	COD060627189	RCR	FOCUSED COMPLIANCE INSPECTION	State	11/15/2007	No Violations Or Compliance Issues Were Found
RCRA	COD060627189	RCR	FINANCIAL RECORD REVIEW	State	02/13/2008	No Violations Or Compliance Issues Were Found
RCRA	COD060627189	RCR	FOCUSED COMPLIANCE INSPECTION	State	08/20/2008	No Violations Or Compliance Issues Were Found
RCRA	COD060627189	RCR	FINANCIAL RECORD REVIEW	State	11/17/2008	No Violations Or Compliance Issues Were Found
RCRA	COD060627189	RCR	FINANCIAL RECORD REVIEW	State	07/01/2009	No Violations Or Compliance Issues Were Found
RCRA	COD060627189	RCR	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	09/24/2009	No Violations Or Compliance Issues Were Found
RCRA	COD060627189	RCR	FINANCIAL RECORD REVIEW	State	05/04/2010	No Violations Or Compliance Issues Were Found
RCRA	COD060627189	RCR	OPERATION AND MAINTENANCE INSPECTION	State	09/23/2010	No Violations Or Compliance Issues Were Found
RCRA	COD060627189	RCR	FOCUSED COMPLIANCE INSPECTION	State	07/28/2011	No Violations Or Compliance Issues Were Found
RCRA	COD060627189	RCR	FINANCIAL RECORD REVIEW	State	07/28/2011	No Violations Or Compliance Issues Were Found

Entries in *italics* are not considered inspections in official counts.

Compliance Summary Data

[Data Dictionary](#)

Information on the nature of [alleged violations](#) is available on the FAQ page.

Statute	Source ID	Current SNC/HPV?	Description	Current As Of	Qtrs in NC (of 12)
CAA	0800100003	YES	VIOLATION UNADDRESSED; STATE/LOCAL HAS LEAD ENFORCEMENT	11/12/2011	12
CWA	COG600174	N/A		Apr-Jun11	
CWA	COG604005	N/A		Apr-Jun11	
CWA	CO0001147	NO		Apr-Jun11	6
RCRA	COD060627189	No		11/09/2011	0
RCRA	COT090011420	No		11/09/2011	0

Three Year Compliance Status by Quarter

[Data Dictionary](#)

Violations shown in a given quarter do not necessarily span the entire 3 months. Information on the nature of [alleged violations](#) is available on the FAQ page, and information on the duration of non-compliance is available at the end of this report.

AIR Compliance Status

Statute:Source ID CAA: 0800100003	QTR1 Jan- Mar09	QTR2 Apr- Jun09	QTR3 Jul- Sep09	QTR4 Oct- Dec09	QTR5 Jan- Mar10	QTR6 Apr- Jun10	QTR7 Jul- Sep10	QTR8 Oct- Dec10	QTR9 Jan- Mar11	QTR10 Apr- Jun11	QTR11 Jul- Sep11	QTR12 Oct- Dec11	
HPV History	Unaddr- State	Unaddr- State	Unaddr- State	Unaddr- State	Unaddr- State	Unaddr- State	Unaddr- State	Unaddr- State	Unaddr- State	Unaddr- State	Unaddr- State	Unaddr- State	
Program/Pollutant in Current Violation													
MACT (SECTION 63 NESHAPS)									V- EM&PRO	V- EM&PRO	V-HPV Vio	V-HPV Vio	V-HPV Vio
BENZENE												V-HPV Vio	
CARBON MONOXIDE												V-HPV Vio	
SULFUR DIOXIDE												S-HPV Sch	
VISIBLE EMISSIONS												S-HPV Sch	
VOLATILE ORGANIC COMPOUNDS												V- EM&PRO	
TITLE V PERMITS					V- EM&PRO	V- EM&PRO	V- EM&PRO	V- EM&PRO	V- EM&PRO	V- EM&PRO	V-HPV Vio	V-HPV Vio	V-HPV Vio
BENZENE												V-HPV Vio	
CARBON MONOXIDE												V-HPV Vio	
SULFUR DIOXIDE												S-HPV Sch	
VISIBLE EMISSIONS												S-HPV Sch	
VOLATILE ORGANIC COMPOUNDS												V- EM&PRO	
SIP											V-HPV Vio	V-HPV Vio	V-HPV Vio
BENZENE												V-HPV Vio	
CARBON MONOXIDE												V-HPV Vio	
SULFUR DIOXIDE												S-HPV Sch	
VISIBLE EMISSIONS												S-HPV Sch	
VOLATILE ORGANIC COMPOUNDS												S-HPV Sch	
PSD											V-HPV Vio	V-HPV Vio	V-HPV Vio
BENZENE												V-HPV Vio	
CARBON MONOXIDE												V-HPV Vio	
SULFUR DIOXIDE												S-HPV Sch	
VISIBLE EMISSIONS												S-HPV Sch	
VOLATILE ORGANIC												S-HPV	

COMPOUNDS NESHAP									V- EM&PRO	V- EM&PRO	V-HPV Vio	V-HPV Vio	Sch V-HPV Vio
BENZENE													V-HPV Vio
CARBON MONOXIDE													V-HPV Vio
SULFUR DIOXIDE													S-HPV Sch
VISIBLE EMISSIONS													S-HPV Sch
VOLATILE ORGANIC COMPOUNDS													S-HPV Sch
NSPS									V- EM&PRO	V- EM&PRO	V-HPV Vio	V-HPV Vio	V-HPV Vio
BENZENE													V-HPV Vio
CARBON MONOXIDE													V-HPV Vio
SULFUR DIOXIDE													S-HPV Sch
VISIBLE EMISSIONS													S-HPV Sch
VOLATILE ORGANIC COMPOUNDS													V- EM&PRO

High Priority Violator (HPV) History section: "Unaddr" means the facility has not yet been addressed with a formal enforcement action. "Addr" means the facility has been addressed with a formal enforcement action, but its violations have not been resolved. Lead Agency designated can be US EPA, State, Both, or No Lead Determined. If HPV History is blank, then the facility was not a High Priority Violator. V=Violation; S=Compliance Schedule.

CWA/NPDES Compliance Status												
Statute:Source ID CWA:COG600174	QTR1 Jul- Sep08	QTR2 Oct- Dec08	QTR3 Jan- Mar09	QTR4 Apr- Jun09	QTR5 Jul- Sep09	QTR6 Oct- Dec09	QTR7 Jan- Mar10	QTR8 Apr- Jun10	QTR9 Jul- Sep10	QTR10 Oct- Dec10	QTR11 Jan- Mar11	QTR12 Apr- Jun11
Non-compliance in Quarter	N/A	No	No	No	No	No	No	No	No	No	No	No
Facility Status	N/A											
Effluent Violations by NPDES Parameter:												
View effluent charts for all parameters: Only Charts with Violations All Charts Custom Output												
(or click on parameter names below for individual parameter charts)												

Effluent Violations are displayed as highest percentage by which the permit limit was exceeded for the quarter. **Bold, large** print indicates Significant Non-compliance (SNC) effluent violations. **Shaded boxes** indicate unresolved SNC violations.

CWA/NPDES Compliance Status												
Statute:Source ID CWA:COG604005	QTR1 Jul- Sep08	QTR2 Oct- Dec08	QTR3 Jan- Mar09	QTR4 Apr- Jun09	QTR5 Jul- Sep09	QTR6 Oct- Dec09	QTR7 Jan- Mar10	QTR8 Apr- Jun10	QTR9 Jul- Sep10	QTR10 Oct- Dec10	QTR11 Jan-Mar11	QTR12 Apr- Jun11
Non-compliance in Quarter	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No	No
Facility Status			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	R(Resolvd)	
Effluent Violations by NPDES Parameter:												
View effluent charts for all parameters: Only Charts with Violations All Charts Custom Output												
(or click on parameter names below for individual parameter charts)												

CWA/NPDES Compliance Status													
Statute:Source ID CWA:CO0001147		QTR1 Jul- Sep08	QTR2 Oct- Dec08	QTR3 Jan-Mar09	QTR4 Apr- Jun09	QTR5 Jul- Sep09	QTR6 Oct- Dec09	QTR7 Jan- Mar10	QTR8 Apr- Jun10	QTR9 Jul-Sep10	QTR10 Oct-Dec10	QTR11 Jan-Mar11	QTR12 Apr- Jun11
Non-compliance in Quarter		No	Yes	Yes	No	No	Yes	No	No	No	Yes	Yes	No
SNC/RNC Status »				N(RptViol)						R(Resolvd)	R(Resolvd)	R(Resolvd)	

Effluent Violations by NPDES Parameter:

View effluent charts for all parameters: [Only Charts with Violations](#) [All Charts](#) [Custom Output](#)

(or click on parameter names below for individual parameter charts)

Discharge point:001													
pH	Neither					Lim Viol							
Zinc, potentially dissolved	Mthly		40%										
	NMth		29%										

Discharge point:002													
Solids, total suspended	NMth											39%	

Discharge point:010													
Selenium, dissolved (as Se)	Mthly			10%							16%		
Sulfide, total (as S)	Mthly		1415%										

Permit Schedule Violations:													
Schedule Event unachieved and not reported ; Achieve Final Compliance With Emission or Discharge Limits													12/31/09
Schedule Event reported late ; Achieve Final Compliance With Emission or Discharge Limits													12/31/09
Schedule Event achieved late but reported ; Achieve Final Compliance With Emission or Discharge Limits													12/31/09
Schedule Event unachieved but reported ; Achieve Final Compliance With Emission or Discharge Limits													12/31/09
Schedule Event achieved late but reported ; Plan, Report, or Scope of Work													12/31/10

RCRA Compliance Status													
Statute:Source ID RCRA: COD060627189		QTR1 Jan- Mar09	QTR2 Apr- Jun09	QTR3 Jul- Sep09	QTR4 Oct- Dec09	QTR5 Jan- Mar10	QTR6 Apr- Jun10	QTR7 Jul- Sep10	QTR8 Oct- Dec10	QTR9 Jan- Mar11	QTR10 Apr- Jun11	QTR11 Jul- Sep11	QTR12 Oct- Dec11
Facility Level Status													

Type of Violation	Agency
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RCRA Compliance Status													
Statute:Source ID RCRA: COT090011420		QTR1 Jan- Mar09	QTR2 Apr- Jun09	QTR3 Jul- Sep09	QTR4 Oct- Dec09	QTR5 Jan- Mar10	QTR6 Apr- Jun10	QTR7 Jul- Sep10	QTR8 Oct- Dec10	QTR9 Jan- Mar11	QTR10 Apr- Jun11	QTR11 Jul- Sep11	QTR12 Oct- Dec11
Facility Level Status													
Type of Violation	Agency												

The first date displayed for a RCRA Violation corresponds to the violation determination date, and the next to the resolution date (if the violation has been resolved).

Notices of Violation or Informal Enforcement - AFS, PCS, ICIS-NPDES, RCRAInfo (05 year history)

[Data Dictionary](#)

Statute	Source ID	Type of Action	Lead Agency	Date
CAA	0800100003	STATE/LOCAL NOV ISSUED	State	05/27/2011
CAA	0800100003	STATE/LOCAL NOV ISSUED	State	09/01/2011

Formal Enforcement Actions - (05 year history)

AFS, PCS, RCRAInfo, NCDB

[Data Dictionary](#)

Statute	Source ID	Type of Action	Lead Agency	Date	Penalty	Penalty Description
CAA	0800100003	STATE/LOCAL ADMINISTRATIVE ORDER ISSUED	State	01/17/2007	\$36,600	
CAA	0800100003	STATE/LOCAL ADMINISTRATIVE ORDER ISSUED	State	05/15/2008	\$53,368	
CAA	0800100003	STATE/LOCAL ADMINISTRATIVE ORDER ISSUED	State	03/11/2010	\$115,200	
CAA	0800100003	STATE/LOCAL ADMINISTRATIVE ORDER ISSUED	State	02/16/2011	\$139,500	
RCRA	COD060627189	FINAL 3008(H) I.S. CA ORDER	State	06/21/2007		

In some cases, formal enforcement actions may be entered both at the initiation and final stages of the action. These may appear more than once above. Entries in *italics* are not "formal" actions under the PCS definitions but are either the initiation of an action or penalties assessed as a result of a previous action. This section includes US EPA and State formal enforcement actions under CAA, CWA and RCRA.

ICIS

[Data Dictionary](#)

Primary Law/Section	Case Number	Case Type	Lead Agency	Case Name	Issued/Filed Date	Settlement Date	Federal Penalty	State/Local Penalty	SEP Cost	Comp Action Cost
TSCA / §6-PCBS	08-2007-0170	Administrative - Formal	EPA	Suncor Energy	09/18/2007	11/15/2007	\$1,500			\$1,500

Federal enforcement actions and penalties shown in this section are from the Integrated Compliance Information System (ICIS-FE&C). These actions may duplicate records in the Formal Enforcement Actions section.

† This enforcement case involves more than one facility. Penalties, SEP Cost, and complying action cost apply to the case as a whole and not just to this facility. Click on the Case Number for more information.

Environmental Conditions

[Data Dictionary](#)

Permit ID	Watershed	Watershed Name	Receiving Waters	Impaired Waters?	Combined Sewer System?
COG600174			SAND CREEK	NO	No
COG604005	COSPUS16a		Sand Creek	TMDL	No
CO0001147	COSPUS15		ALL BUT 010 BEFORE ENTRNG SAND CRK	TMDL	No

TRI History of Reported Chemicals Released in Pounds per Year at Site:80022CNCND5801B

[Data Dictionary](#)

Chemical releases reported to TRI are provided for context and are not associated with non-compliance for that facility.

Year /	Total Air Emissions	Surface Water Discharges	Underground Injections	Releases to Land	Total On-site Releases	Total Off-site Transfers	Total Releases and Transfers
2001	103,006	26,519			129,525	60	129,585
2002	112,124	25,951			138,075	24,057	162,132
2003	8,503	28,268			36,771	33	36,804
2004	56,013	3,185			59,198	572	59,770
2005	116,065	3,955			120,020	321	120,341
2006	70,844	5,241			76,085	608	76,693
2007	76,545	2,686			79,231	805	80,036
2008	80,425	21,412			101,837	101,511	203,348
2009	67,133	17,080			84,213	386	84,599

TRI Total Releases and Transfers by Chemical and Year

Chemical releases and transfers are in pounds except where otherwise noted.

Chemical Name	2001	2002	2003	2004	2005	2006	2007	2008	2009
COBALT COMPOUNDS		5,803		153	179	358	547	23,858	
LEAD COMPOUNDS	21	15	4	4	4	8	15	145	87
MERCURY COMPOUNDS	3	1	1	3	4	3	8	16	82
NICKEL COMPOUNDS								341	
NITRATE COMPOUNDS	24,877	23,682	24,736		1,269	2,363	1,625	20,834	16,669
POLYCYCLIC AROMATIC COMPOUNDS,	308	262	311	28	19	35	35	72	2
BENZENE	3,007	3,784	1,019	492	1,147	1,308	1,098	901	817
ETHYLENE	1,586		377	508	970	699	702	1,564	1,595
NAPHTHALENE	22	44	18	23	34	55	53	487	429
1,2,4-TRIMETHYLBENZENE	124	116	69	45	82	356	321	281	306
CUMENE	209	217	161	114	198	237	189	155	124
ETHYLBENZENE	146	148	67	76	112	101	91	228	231
1,3-BUTADIENE	61	62	5	11	59	14	16	29	11
TOLUENE	384	399	361	318	638	859	816	1,782	1,047
N-HEXANE	14,337	20,510	2,373	11,102	20,202	19,292	19,963	26,705	25,745
CYCLOHEXANE	681	694	484	357	692	990	963	886	944
PROPYLENE	21,110	21,402	1,036	4,437	12,525	9,761	7,706	10,443	5,328
MOLYBDENUM TRIOXIDE	318	18,948		979	1,186	778	631	76,961	
XYLENE (MIXED ISOMERS)	527	579	218	217	387	3,900	3,419	5,870	3,532
AMMONIA	4,941	4,377	5,537	4,330	6,742	4,331	5,264	4,720	6,934
SULFURIC ACID (1994 AND AFTER)	56,897	61,067		36,571	72,962	30,367	36,571	27,070	20,716
CHLORINE					929	875			
BENZO(G,H,I)PERYLENE	26	22	27	2	1	3	3		

Demographic Profile of Surrounding Area (3 Miles)

[Data Dictionary](#)

Open more detailed information in a new window (links leave ECHO): [1 Mi](#) [3 Mi](#) or [5 Mi](#).

This section provides demographic information regarding the community surrounding the facility. ECHO compliance data alone are not sufficient to determine whether violations at a particular facility had negative impacts on public health or the environment. Statistics are based upon the 2000 US Census data, and are accurate to the extent that the facility latitude and longitude listed below are correct. The latitude and longitude are obtained from the EPA [Locational Reference Table\(LRT\)](#) when available.

Radius of Area:	3 Miles	Land Area:	99.65%	Households in area:	16,982
Center Latitude:	39.802222	Water Area:	0.35%	Housing units in area:	17,525
Center Longitude:	-104.941111	Population Density:	1934.01/sq. mi.	Households On Public Assistance:	1,036
Total Persons:	54,481	Percent Minority:	74.00%	Persons Below Poverty Level:	11,426

Race Breakdown	Persons (%)	Age Breakdown:	Persons (%)
White:	25,529 (46.86%)	Child 5 years and less:	6,020 (11.05%)
African-american:	9,823 (18.03%)	Minors 17 years and younger:	17,390 (31.92%)
Hispanic-Origin:	29,089 (53.39%)	Adults 18 years and older:	37,090 (68.08%)
Asian/Pacific Islander:	475 (0.87%)	Seniors 65 years and older:	4,940 (9.07%)
American Indian:	721 (1.32%)		
Other/Multiracial:	15,644 (28.71%)		

Education Level (Persons 25 & older)	Persons (%)	Income Breakdown:	Households (%)
Less than 9th grade:	6,121 (20.97%)	Less than \$15,000:	3,626 (21.35%)
9th-12th grades:	7,025 (24.06%)	\$15,000-\$25,000:	2,826 (16.64%)
High School Diploma:	9,004 (30.84%)	\$25,000-\$50,000:	5,949 (35.03%)
Some College/2-yr:	4,948 (16.95%)	\$50,000-\$75,000:	3,045 (17.93%)
B.S./B.A. or more:	2,098 (7.19%)	Greater than \$75,000:	1,590 (9.36%)

Notice About Duration of Violations -- The duration of violations shown on this report is an estimate of the actual duration of the violations that might be alleged or later determined in a legal proceeding. For example, the start date of the violation as shown in the ECHO database is normally when the government first became aware of the violation, not the first date that the violation occurred, and the facility may have corrected the violation before the end date shown. In some situations, violations may have been corrected by the facility, but EPA or the State has not verified the correction of these violations. In other situations, EPA does not remove the violation flag until an enforcement action has been resolved.



This report was generated by the Integrated Data for Enforcement Analysis (IDEA) system, which updates its information from program databases monthly. The data were last updated: AFS: 11/12/2011. RCRAInfo: 11/09/2011. NCDB: 10/27/2006. FRS: 11/10/2011. TRI: 01/27/2011. ICIS: 11/10/2011.

Some regulated facilities have expressed an interest in explaining data shown in the Detailed Facility Reports in ECHO. Please check company web sites for such explanations.

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Exhibit 2

EPA, Toxic Release Inventory Data for Suncor Energy Commerce City Refinery, available at http://oaspub.epa.gov/enviro/tris_control.tris_print?tris_id=80022CNCDN5801B



Toxics Release Inventory (TRI)

You are here: [EPA Home](#) [Envirofacts](#) [TRI](#) Envirofacts Report

http://oaspub.epa.gov/enviro/tris_control.tris_print?tris_id=80022CNCNDN5801B
Last updated on December 1, 2011



Envirofacts Report



Query executed on DEC-01-2011
Results are based on data extracted on OCT-27-2011

Click on "View Facility Information" to view EPA Facility information for the facility.

Facility Name:	SUNCOR ENERGY COMMERCE CITY REFINERY	Mailing Name:	SUNCOR ENERGY COMMERCE CITY REFINERY
Address:	5801 BRIGHTON BLVD COMMERCE CITY CO 80022	Mailing Address:	5801 BRIGHTON BLVD COMMERCE CITY CO 80022
County:	ADAMS	Region:	8
Facility Information:	View Facility Information	TRI ID:	80022CNCNDN5801B
		FRS ID	110015848813
		TRI Preferred Longitude:	104.945556
Public Contact:	JOHN GALLAGHER	Phone:	3032865788
Parent Company:	SUNCOR ENERGY (USA) INC	Parent DUNS:	241804681
		DUNS Number:	241804681

Starting with Reporting Year 2006, TRI Facilities began reporting NAICS codes, instead of SIC codes, to identify their Primary Business Activities.

NAICS Codes for 2010

NAICS CODE	PRIMARY	NAICS DESCRIPTION
324110	YES	Petroleum Refineries
424710	NO	Petroleum Bulk Stations and Terminals

The above information comes from 2010, which was the last year NAICS code data was reported for this facility. The earliest NAICS code data on file for this facility was reported in 1988.

[Map this facility](#)

Map this facility using one of Envirofact's mapping utilities.

Besides TRI, this facility also does the following:

- has reported air releases under the Clean Air Act
- has permits to discharge to water

More information about these additional regulatory aspects of this facility can be found by pressing the other regulatory data button below.

[Other Regulatory Data](#)

Total Aggregate Releases of TRI Chemicals to the Environment:

For all releases estimated as a range, the mid-point of the range was used in these calculations. This table summarizes the releases reported by the facility. **NR** - signifies nothing reported by this facility for the corresponding medium.

Total Aggregate Releases of TRI Chemicals excluding Dioxin and Dioxin-like Compounds (Measured in Pounds)

Media	2010	2009	2008	2007	2006	2005	2004	2003	2002	2001	2000	1999	1998	1997	1996	1995	1994	1993	1992	1991	1990	1989	1988	1987
Air Emissions	49769.72	67134.02	80426.52	76547.61	70845.01	116065.81	56014.02	8504.45	112125.378	103007.028	105858	111346	125792	125962	134817	119866	120524	123273	128084	92617	69362	171990	393352	367279
Surface																								

Water Discharges	17190.21	17080.52	21413.25	2686.55	5242.28	3956.98	3185.74	28269.26	25952.79	26519.898	28099.65	23780	16252	18705	18816	31772	10932	44915	15527	21026	21026	21488	24917	422322
Releases to Land	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	0	0	0	0	0	NR	NR	NR	NR	NR	NR	NR	NR	32000
Underground Injection	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Total On-Site Releases	66959.93	84214.54	101839.77	79234.16	76087.29	120022.79	59199.76	36773.71	138078.168	129526.926	133957.65	135126	142044	144667	153633	151638	131456	168188	143611	113643	90388	193478	418269	821601
Transfer Off-Site to Disposal	34	67	23344	280	588.7	322.01	567	26.77	5674.01	45.81	49.4	10	1167	1491	1827	759	112	283	291	13419	14846	29415	540286	503422
Total Releases	66993.93	84281.54	125183.77	79514.16	76675.99	120344.8	59766.76	36800.48	143752.178	129572.736	134007.05	135136	143211	146158	155460	152397	131568	168471	143902	127062	105234	222893	958555	1325023

Graphic Summary of this Table

Total Aggregate Releases of Dioxin and Dioxin-like Compounds (Measured in Grams)

Media	2010	2009	2008	2007	2006	2005	2004	2003	2002	2001	2000	1999	1998	1997	1996	1995	1994	1993	1992	1991	1990	1989	1988	1987
Air Emissions	0	0	0	.37	.36	.057	.037	.074	.00004	.014	.015	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Surface Water Discharges	.0396757	.35	.35	.11	.11	.111	.037	.074	.095	.074	.06	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Releases to Land	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Underground Injection	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Total On-Site Releases	.0396757	.35	.35	.48	.47	.168	.074	.148	.09504	.088	.075	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Transfer Off-Site to Disposal	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	.0012	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Total Releases	.0396757	.35	.35	.48	.47	.168	.074	.148	.09504	.088	.0762	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR

Graphic Summary of this Table

TRI Chemicals Reported on Form A:

The facility has certified that for each chemical listed below, the annual release did not exceed 500 pounds for the reporting year listed and the listed chemical was not manufactured, processed, or otherwise used in an amount exceeding 1 million pounds in the reporting year. Form A can not be filed for PBT chemicals (except certain instances of reporting lead in stainless steel, brass, or bronze alloys).

Chemical Name	TRI Chemical ID	2010	2009	2008	2007	2006	2005	2004	2003	2002	2001	2000	1999	1998	1997	1996	1995	1994	1993	1992	1991	1990	1989	1988	1987
1,3-BUTADIENE	000106990	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported
TETRACHLOROETHYLENE	000127184	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported	Not Reported

NOTE:
All chemicals reported below have release or transfer amounts greater than zero. To see a list of all chemicals reported by this facility click [here](#).

Names and Amounts of Chemicals Released to the Environment by Year.

For all releases estimated as a range, the mid-point of the range was used in these calculations. **NR** - signifies nothing reported for this facility by the corresponding medium. Rows with all "0" or "NR" values were not listed.

Chemical Name	Media	Unit Of Measure	2010	2009	2008	2007	2006	2005	2004	2003	2002	2001	2000	1999	1998	1997	1996	1995	1994	1993	1992	1991	1990	1989	1988	1987
1.1.1- TRICHLOROETHANE (TRI Chemical ID: 000071556)	AIR FUG	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	390	NR	NR	NR	NR	NR	NR	NR	NR
1.2.4- TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	AIR FUG	Pounds	24	59	20	49	91	16	3	11	47	49	56	66	305	429	750	1400	1400	2100	3300	2300	510	2300	3700	3700
1.2.4- TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	AIR STACK	Pounds	159	238	215	272	265	66	42	58	69	75	76	68	211	199	17	20	20	330	0	79	6	6	6	5

BENZO(G,H,I)PERYLENE (TRI Chemical ID: 000191242)	AIR STACK	Pounds	.01	.02	.02	.01	.01	.01	.01	23.43	22.93	24.75	25	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
BENZO(G,H,I)PERYLENE (TRI Chemical ID: 000191242)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	NR	1.5	2.4	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
BENZO(G,H,I)PERYLENE (TRI Chemical ID: 000191242)	WATER	Pounds	.19	.22	.15	3.21	3.18	1.69	2.56	4.83	.8	.46	.5	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
BIPHENYL (TRI Chemical ID: 000092524)	AIR FUG	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	250
BIPHENYL (TRI Chemical ID: 000092524)	AIR STACK	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	250
BIPHENYL (TRI Chemical ID: 000092524)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	750
BIPHENYL (TRI Chemical ID: 000092524)	WATER	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	500
CHLORINE (TRI Chemical ID: 007782505)	AIR FUG	Pounds	NR	NR	NR	NR	0	0	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	279	86	86	86	91	370	370	370	250
CHLORINE (TRI Chemical ID: 007782505)	AIR STACK	Pounds	NR	NR	NR	NR	875	875	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	0	0	0	0	NR	NR	NR	NR	NR
CHLORINE (TRI Chemical ID: 007782505)	WATER	Pounds	NR	NR	NR	NR	0	54	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
COBALT COMPOUNDS (TRI Chemical ID: N096)	AIR FUG	Pounds	NR	NR	292	292	292	118	36	NR	129	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
COBALT COMPOUNDS (TRI Chemical ID: N096)	DISP NON METALS	Pounds	NR	NR	NR	NR	66	61	117	NR	5674	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
COBALT COMPOUNDS (TRI Chemical ID: N096)	DISP NON METALS	Pounds	NR	NR	22909	5	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
CUMENE (TRI Chemical ID: 000098828)	AIR FUG	Pounds	27	27	40	37	76	32	19	22	76	51	55	78	305	429	1108	1800	1800	1700	2800	2100	1900	4100	6700	6600	
CUMENE (TRI Chemical ID: 000098828)	AIR STACK	Pounds	94	97	110	152	161	166	95	139	141	158	177	155	211	199	17	32	42	47	38	170	14	14	15	16	
CUMENE (TRI Chemical ID: 000098828)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	4	NR	1500	410	590	1247	580	
CUMENE (TRI Chemical ID: 000098828)	WATER	Pounds	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4	4	4	4	3	3	3	3	3	
CYCLOHEXANE (TRI Chemical ID: 000110827)	AIR FUG	Pounds	100	219	161	139	209	148	69	65	261	210	241	247	745	990	2298	4500	6100	4700	6400	5100	2800	7000	11000	11000	
CYCLOHEXANE (TRI Chemical ID: 000110827)	AIR STACK	Pounds	546	725	725	824	781	544	288	419	433	471	432	392	277	318	149	500	360	560	1000	380	550	570	570	350	
CYCLOHEXANE (TRI Chemical ID: 000110827)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	4	NR	470	180	370	416	110	
CYCLOHEXANE (TRI Chemical ID: 000110827)	WATER	Pounds	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4	4	4	4	3	3	3	3	3	
DICHLOROMETHANE	ATP																										

(TRI Chemical ID: 001634044)	FUG	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	1300	1000	15000	11000	200	6100	9300	9000	
METHYL TERT-BUTYL ETHER (TRI Chemical ID: 001634044)	AIR STACK	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	12000	14000	15000	17000	7700	7000	6000	620	
METHYL TERT-BUTYL ETHER (TRI Chemical ID: 001634044)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	1	NR	
METHYL TERT-BUTYL ETHER (TRI Chemical ID: 001634044)	WATER	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	3000	880	1500	1000	1000	460	400	294	
MOLYBDENUM TRIOXIDE (TRI Chemical ID: 001313275)	AIR FUG	Pounds	NR	NR	762	376	528	971	569	NR	664	318	NR	126	129	73	332	58	0	70	100	99	NR	NR	26	250		
MOLYBDENUM TRIOXIDE (TRI Chemical ID: 001313275)	DISP METALS	Pounds	NR	NR	NR	NR	250	215	410	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
MOLYBDENUM TRIOXIDE (TRI Chemical ID: 001313275)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	500	
MOLYBDENUM TRIOXIDE (TRI Chemical ID: 001313275)	WATER	Pounds	NR	NR	0	NR	0	0	0	NR	0	0	NR	0	0	0	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	500
N-HEXANE (TRI Chemical ID: 000110543)	AIR FUG	Pounds	582	676	627	332	483	584	368	288	13294	8026	8391	10736	13405	15053	18048	3300	NR	NR	NR	NR	NR	NR	NR	NR	NR	
N-HEXANE (TRI Chemical ID: 000110543)	AIR STACK	Pounds	23919	25069	26078	19631	18809	19618	10734	2085	7216	6311	6478	5869	5303	5428	513	2400	NR	NR	NR	NR	NR	NR	NR	NR	NR	
NAPHTHALENE (TRI Chemical ID: 000091203)	AIR FUG	Pounds	381	387	379	11.9	13	10	8	1	29	20	15	265	297	308	115	890	1000	990	3100	2500	1100	4400	8300	8300		
NAPHTHALENE (TRI Chemical ID: 000091203)	AIR STACK	Pounds	23	25	27	42	42	24	15	17	1	2	1	1	1	1	1	39	52	130	210	380	72	72	72	160		
NAPHTHALENE (TRI Chemical ID: 000091203)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	5	37	7	6400	1700	1560	4898	1120	
NAPHTHALENE (TRI Chemical ID: 000091203)	WATER	Pounds	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	8	7	8	8	5	5	7	6	6		
NICKEL COMPOUNDS (TRI Chemical ID: N495)	AIR FUG	Pounds	NR	NR	338	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
NICKEL COMPOUNDS (TRI Chemical ID: N495)	WATER	Pounds	NR	NR	3	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
NITRATE COMPOUNDS (TRI Chemical ID: N511)	WATER	Pounds	16870	16669	20804	1625	2363	1269	NR	24736	23682	24877	27461	23515	14995	18084	17328	31000	NR	NR	NR	NR	NR	NR	NR	NR	NR	
PHOSPHORIC ACID (TRI Chemical ID: 007664382)	AIR FUG	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	0	0	0	0	NR	NR	NR	NR	NR	NR	NR	NR	2600	
PHOSPHORIC ACID (TRI Chemical ID: 007664382)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	5	NR	NR	NR	NR	NR	NR	NR	2300	6000	5700	NR	
POLYCYCLIC AROMATIC COMPOUNDS (TRI Chemical ID: N590)	AIR FUG	Pounds	.01	0	0	0	0	0	.01	.11	1	0	1	11	2	2	19	5	NR	NR	NR	NR	NR	NR	NR	NR	NR	
POLYCYCLIC AROMATIC COMPOUNDS (TRI Chemical ID: N590)	AIR STACK	Pounds	0	0	0	0	0	0	.2	258	252	287	272	318	279	308	300	250	NR	NR	NR	NR	NR	NR	NR	NR	NR	

XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	WATER	Pounds	18	24	329	0	0	0	0	0	0	0	0	0	0	0	0	7	6	7	4	3	3	3	120	3
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Discharge of Chemicals into Streams or Bodies of Water:

For all releases estimated as a range, the mid-point of the range was used in these calculations. Rows with Release Amount equal to "0" were not listed.

Chemical Name	Year	Unit Of Measure	Release Amount	Stream Or Body of Water
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1990	Pounds	3	DAND CREEK
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1995	Pounds	5	SAND CREEK
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1994	Pounds	4	SAND CREEK
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1993	Pounds	4	SAND CREEK
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1992	Pounds	4	SAND CREEK
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1991	Pounds	3	SAND CREEK
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1989	Pounds	3	SAND CREEK
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1988	Pounds	3	SAND CREEK
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	1987	Pounds	3	SAND CREEK
2-METHOXYETHANOL (TRI Chemical ID: 000109864)	1987	Pounds	250	BURLINGTON DITCH TO SAND CREEK
2-METHOXYETHANOL (TRI Chemical ID: 000109864)	1987	Pounds	250	SAND CREEK
AMMONIA (TRI Chemical ID: 007664417)	2010	Pounds	292	SAND CREEK
AMMONIA (TRI Chemical ID: 007664417)	2009	Pounds	274	SAND CREEK
AMMONIA (TRI Chemical ID: 007664417)	2008	Pounds	56	SAND CREEK
AMMONIA (TRI Chemical ID: 007664417)	2007	Pounds	1012	SAND CREEK
AMMONIA (TRI Chemical ID: 007664417)	2006	Pounds	2835	SAND CREEK
AMMONIA (TRI Chemical ID: 007664417)	2005	Pounds	2610	SAND CREEK
AMMONIA (TRI Chemical ID: 007664417)	2004	Pounds	3153	SAND CREEK
AMMONIA (TRI Chemical ID: 007664417)	2003	Pounds	3473	SAND CREEK
AMMONIA (TRI Chemical ID: 007664417)	2002	Pounds	2247	SAND CREEK
AMMONIA (TRI Chemical ID: 007664417)	2001	Pounds	1635	SAND CREEK
AMMONIA (TRI Chemical ID: 007664417)	2000	Pounds	633	SAND CREEK
AMMONIA (TRI Chemical ID: 007664417)	1999	Pounds	255	SAND CREEK
AMMONIA (TRI Chemical ID: 007664417)	1998	Pounds	1155	SAND CREEK

AMMONIA (TRI Chemical ID: 007664417)	1997	Pounds	555	SAND CREEK
AMMONIA (TRI Chemical ID: 007664417)	1996	Pounds	1468	SAND CREEK
AMMONIA (TRI Chemical ID: 007664417)	1995	Pounds	483	SAND CREEK
AMMONIA (TRI Chemical ID: 007664417)	1994	Pounds	7900	SAND CREEK
AMMONIA (TRI Chemical ID: 007664417)	1993	Pounds	44000	SAND CREEK
AMMONIA (TRI Chemical ID: 007664417)	1992	Pounds	14000	SAND CREEK
AMMONIA (TRI Chemical ID: 007664417)	1991	Pounds	20000	SAND CREEK
AMMONIA (TRI Chemical ID: 007664417)	1990	Pounds	20000	SAND CREEK
AMMONIA (TRI Chemical ID: 007664417)	1989	Pounds	21000	SAND CREEK
AMMONIA (TRI Chemical ID: 007664417)	1988	Pounds	24000	SAND CREEK
BENZENE (TRI Chemical ID: 000071432)	1987	Pounds	1	BURLINGTON DITCH
BENZENE (TRI Chemical ID: 000071432)	2010	Pounds	.29	SAND CREEK
BENZENE (TRI Chemical ID: 000071432)	2009	Pounds	6	SAND CREEK
BENZENE (TRI Chemical ID: 000071432)	2008	Pounds	5	SAND CREEK
BENZENE (TRI Chemical ID: 000071432)	1995	Pounds	5	SAND CREEK
BENZENE (TRI Chemical ID: 000071432)	1994	Pounds	1	SAND CREEK
BENZENE (TRI Chemical ID: 000071432)	1993	Pounds	1	SAND CREEK
BENZENE (TRI Chemical ID: 000071432)	1992	Pounds	1	SAND CREEK
BENZENE (TRI Chemical ID: 000071432)	1991	Pounds	3	SAND CREEK
BENZENE (TRI Chemical ID: 000071432)	1990	Pounds	3	SAND CREEK
BENZENE (TRI Chemical ID: 000071432)	1989	Pounds	3	SAND CREEK
BENZENE (TRI Chemical ID: 000071432)	1988	Pounds	290	SAND CREEK
BENZENE (TRI Chemical ID: 000071432)	1987	Pounds	3	SAND CREEK
BENZO(G,H,I)PERYLENE (TRI Chemical ID: 000191242)	2010	Pounds	.19	SAND CREEK
BENZO(G,H,I)PERYLENE (TRI Chemical ID: 000191242)	2009	Pounds	.22	SAND CREEK
BENZO(G,H,I)PERYLENE (TRI Chemical ID: 000191242)	2008	Pounds	.15	SAND CREEK
BENZO(G,H,I)PERYLENE (TRI Chemical ID: 000191242)	2007	Pounds	3.21	SAND CREEK
BENZO(G,H,I)PERYLENE (TRI Chemical ID: 000191242)	2006	Pounds	3.18	SAND CREEK
BENZO(G,H,I)PERYLENE (TRI Chemical ID: 000191242)	2005	Pounds	1.69	SAND CREEK
BENZO(G,H,I)PERYLENE				

(TRI Chemical ID: 000191242)	2004	Pounds	2.56	SAND CREEK
BENZO(G,H,I)PERYLENE (TRI Chemical ID: 000191242)	2003	Pounds	4.83	SAND CREEK
BENZO(G,H,I)PERYLENE (TRI Chemical ID: 000191242)	2002	Pounds	.8	SAND CREEK
BENZO(G,H,I)PERYLENE (TRI Chemical ID: 000191242)	2001	Pounds	.46	SAND CREEK
BENZO(G,H,I)PERYLENE (TRI Chemical ID: 000191242)	2000	Pounds	.5	SAND CREEK
BIPHENYL (TRI Chemical ID: 000092524)	1987	Pounds	250	BURLINGTON DITCH TO SAND CREEK
BIPHENYL (TRI Chemical ID: 000092524)	1987	Pounds	250	SAND CREEK
CHLORINE (TRI Chemical ID: 007782505)	2005	Pounds	54	SAND CREEK
CUMENE (TRI Chemical ID: 000098828)	1995	Pounds	4	SAND CREEK
CUMENE (TRI Chemical ID: 000098828)	1994	Pounds	4	SAND CREEK
CUMENE (TRI Chemical ID: 000098828)	1993	Pounds	4	SAND CREEK
CUMENE (TRI Chemical ID: 000098828)	1992	Pounds	4	SAND CREEK
CUMENE (TRI Chemical ID: 000098828)	1991	Pounds	3	SAND CREEK
CUMENE (TRI Chemical ID: 000098828)	1990	Pounds	3	SAND CREEK
CUMENE (TRI Chemical ID: 000098828)	1989	Pounds	3	SAND CREEK
CUMENE (TRI Chemical ID: 000098828)	1988	Pounds	3	SAND CREEK
CUMENE (TRI Chemical ID: 000098828)	1987	Pounds	3	SAND CREEK
CYCLOHEXANE (TRI Chemical ID: 000110827)	1995	Pounds	4	SAND CREEK
CYCLOHEXANE (TRI Chemical ID: 000110827)	1994	Pounds	4	SAND CREEK
CYCLOHEXANE (TRI Chemical ID: 000110827)	1993	Pounds	4	SAND CREEK
CYCLOHEXANE (TRI Chemical ID: 000110827)	1992	Pounds	4	SAND CREEK
CYCLOHEXANE (TRI Chemical ID: 000110827)	1991	Pounds	3	SAND CREEK
CYCLOHEXANE (TRI Chemical ID: 000110827)	1990	Pounds	3	SAND CREEK
CYCLOHEXANE (TRI Chemical ID: 000110827)	1989	Pounds	3	SAND CREEK
CYCLOHEXANE (TRI Chemical ID: 000110827)	1988	Pounds	3	SAND CREEK
CYCLOHEXANE (TRI Chemical ID: 000110827)	1987	Pounds	3	SAND CREEK
DIOXIN AND DIOXIN-LIKE COMPOUNDS (TRI Chemical ID: N150)	2010	Grams	.0396757	SAND CREEK
DIOXIN AND DIOXIN-LIKE COMPOUNDS (TRI Chemical ID: N150)	2009	Grams	.35	SAND CREEK
DIOXIN AND DIOXIN-LIKE COMPOUNDS (TRI Chemical ID: N150)	2008	Grams	.35	SAND CREEK
DIOXIN AND DIOXIN-LIKE COMPOUNDS (TRI Chemical ID: N150)	2007	Grams	.11	SAND CREEK

DIOXIN AND DIOXIN-LIKE COMPOUNDS (TRI Chemical ID: N150)	2006	Grams	.11	SAND CREEK
DIOXIN AND DIOXIN-LIKE COMPOUNDS (TRI Chemical ID: N150)	2005	Grams	.111	SAND CREEK
DIOXIN AND DIOXIN-LIKE COMPOUNDS (TRI Chemical ID: N150)	2004	Grams	.037	SAND CREEK
DIOXIN AND DIOXIN-LIKE COMPOUNDS (TRI Chemical ID: N150)	2003	Grams	.074	SAND CREEK
DIOXIN AND DIOXIN-LIKE COMPOUNDS (TRI Chemical ID: N150)	2002	Grams	.095	SAND CREEK
DIOXIN AND DIOXIN-LIKE COMPOUNDS (TRI Chemical ID: N150)	2001	Grams	.074	SAND CREEK
DIOXIN AND DIOXIN-LIKE COMPOUNDS (TRI Chemical ID: N150)	2000	Grams	.06	SAND CREEK
ETHYLBENZENE (TRI Chemical ID: 000100414)	2010	Pounds	2.63	SAND CREEK
ETHYLBENZENE (TRI Chemical ID: 000100414)	1995	Pounds	1	SAND CREEK
ETHYLBENZENE (TRI Chemical ID: 000100414)	1994	Pounds	1	SAND CREEK
ETHYLBENZENE (TRI Chemical ID: 000100414)	1993	Pounds	1	SAND CREEK
ETHYLBENZENE (TRI Chemical ID: 000100414)	1992	Pounds	1	SAND CREEK
ETHYLBENZENE (TRI Chemical ID: 000100414)	1991	Pounds	3	SAND CREEK
ETHYLBENZENE (TRI Chemical ID: 000100414)	1990	Pounds	3	SAND CREEK
ETHYLBENZENE (TRI Chemical ID: 000100414)	1989	Pounds	3	SAND CREEK
ETHYLBENZENE (TRI Chemical ID: 000100414)	1988	Pounds	37	SAND CREEK
ETHYLBENZENE (TRI Chemical ID: 000100414)	1987	Pounds	3	SAND CREEK
LEAD COMPOUNDS (TRI Chemical ID: N420)	2010	Pounds	3.1	SAND CREEK
LEAD COMPOUNDS (TRI Chemical ID: N420)	2009	Pounds	14.2	SAND CREEK
LEAD COMPOUNDS (TRI Chemical ID: N420)	2008	Pounds	4.7	SAND CREEK
LEAD COMPOUNDS (TRI Chemical ID: N420)	2007	Pounds	11.04	SAND CREEK
LEAD COMPOUNDS (TRI Chemical ID: N420)	2006	Pounds	4.8	SAND CREEK
LEAD COMPOUNDS (TRI Chemical ID: N420)	2005	Pounds	2.99	SAND CREEK
LEAD COMPOUNDS (TRI Chemical ID: N420)	2004	Pounds	2.1	SAND CREEK
LEAD COMPOUNDS (TRI Chemical ID: N420)	2003	Pounds	2.35	SAND CREEK
LEAD COMPOUNDS (TRI Chemical ID: N420)	2002	Pounds	13.92	SAND CREEK
LEAD COMPOUNDS (TRI Chemical ID: N420)	2001	Pounds	2.368	SAND CREEK
MERCURY COMPOUNDS (TRI Chemical ID: N458)	2010	Pounds	1	SAND CREEK
MERCURY COMPOUNDS (TRI Chemical ID: N458)	2009	Pounds	76.1	SAND CREEK

MERCURY COMPOUNDS (TRI Chemical ID: N458)	2008	Pounds	11.4	SAND CREEK
MERCURY COMPOUNDS (TRI Chemical ID: N458)	2007	Pounds	.3	SAND CREEK
MERCURY COMPOUNDS (TRI Chemical ID: N458)	2006	Pounds	1.3	SAND CREEK
MERCURY COMPOUNDS (TRI Chemical ID: N458)	2005	Pounds	.3	SAND CREEK
MERCURY COMPOUNDS (TRI Chemical ID: N458)	2004	Pounds	.08	SAND CREEK
MERCURY COMPOUNDS (TRI Chemical ID: N458)	2003	Pounds	.08	SAND CREEK
MERCURY COMPOUNDS (TRI Chemical ID: N458)	2002	Pounds	.07	SAND CREEK
MERCURY COMPOUNDS (TRI Chemical ID: N458)	2001	Pounds	.07	SAND CREEK
MERCURY COMPOUNDS (TRI Chemical ID: N458)	2000	Pounds	.15	SAND CREEK
METHYL TERT-BUTYL ETHER (TRI Chemical ID: 001634044)	1991	Pounds	1000	SAND CAREEK
METHYL TERT-BUTYL ETHER (TRI Chemical ID: 001634044)	1994	Pounds	3000	SAND CREEK
METHYL TERT-BUTYL ETHER (TRI Chemical ID: 001634044)	1993	Pounds	880	SAND CREEK
METHYL TERT-BUTYL ETHER (TRI Chemical ID: 001634044)	1992	Pounds	1500	SAND CREEK
METHYL TERT-BUTYL ETHER (TRI Chemical ID: 001634044)	1990	Pounds	1000	SAND CREEK
METHYL TERT-BUTYL ETHER (TRI Chemical ID: 001634044)	1989	Pounds	460	SAND CREEK
METHYL TERT-BUTYL ETHER (TRI Chemical ID: 001634044)	1988	Pounds	400	SAND CREEK
METHYL TERT-BUTYL ETHER (TRI Chemical ID: 001634044)	1987	Pounds	294	SAND CREEK
MOLYBDENUM TRIOXIDE (TRI Chemical ID: 001313275)	1987	Pounds	250	BURLINGTON DITCH TO SAND CREEK
MOLYBDENUM TRIOXIDE (TRI Chemical ID: 001313275)	1987	Pounds	250	SAND CREEK
NAPHTHALENE (TRI Chemical ID: 000091203)	1987	Pounds	6	SAND CREEK
NAPHTHALENE (TRI Chemical ID: 000091203)	1995	Pounds	8	SAND CREEK
NAPHTHALENE (TRI Chemical ID: 000091203)	1994	Pounds	7	SAND CREEK
NAPHTHALENE (TRI Chemical ID: 000091203)	1993	Pounds	8	SAND CREEK
NAPHTHALENE (TRI Chemical ID: 000091203)	1992	Pounds	8	SAND CREEK
NAPHTHALENE (TRI Chemical ID: 000091203)	1991	Pounds	5	SAND CREEK
NAPHTHALENE (TRI Chemical ID: 000091203)	1990	Pounds	5	SAND CREEK
NAPHTHALENE (TRI Chemical ID: 000091203)	1989	Pounds	7	SAND CREEK
NAPHTHALENE (TRI Chemical ID: 000091203)	1988	Pounds	6	SAND CREEK
NICKEL COMPOUNDS (TRI Chemical ID: N495)	2008	Pounds	3	SAND CREEK
NITRATE COMPOUNDS (TRI Chemical ID: N511)	2010	Pounds	16870	SAND CREEK

<u>NITRATE COMPOUNDS</u> (TRI Chemical ID: N511)	2009	Pounds	16669	SAND CREEK
<u>NITRATE COMPOUNDS</u> (TRI Chemical ID: N511)	2008	Pounds	20804	SAND CREEK
<u>NITRATE COMPOUNDS</u> (TRI Chemical ID: N511)	2007	Pounds	1625	SAND CREEK
<u>NITRATE COMPOUNDS</u> (TRI Chemical ID: N511)	2006	Pounds	2363	SAND CREEK
<u>NITRATE COMPOUNDS</u> (TRI Chemical ID: N511)	2005	Pounds	1269	SAND CREEK
<u>NITRATE COMPOUNDS</u> (TRI Chemical ID: N511)	2003	Pounds	24736	SAND CREEK
<u>NITRATE COMPOUNDS</u> (TRI Chemical ID: N511)	2002	Pounds	23682	SAND CREEK
<u>NITRATE COMPOUNDS</u> (TRI Chemical ID: N511)	2001	Pounds	24877	SAND CREEK
<u>NITRATE COMPOUNDS</u> (TRI Chemical ID: N511)	2000	Pounds	27461	SAND CREEK
<u>NITRATE COMPOUNDS</u> (TRI Chemical ID: N511)	1999	Pounds	23515	SAND CREEK
<u>NITRATE COMPOUNDS</u> (TRI Chemical ID: N511)	1998	Pounds	14995	SAND CREEK
<u>NITRATE COMPOUNDS</u> (TRI Chemical ID: N511)	1997	Pounds	18084	SAND CREEK
<u>NITRATE COMPOUNDS</u> (TRI Chemical ID: N511)	1996	Pounds	17328	SAND CREEK
<u>NITRATE COMPOUNDS</u> (TRI Chemical ID: N511)	1995	Pounds	31000	SAND CREEK
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	2010	Pounds	2	SAND CREEK
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	2009	Pounds	2	SAND CREEK
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	2008	Pounds	2	SAND CREEK
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	2007	Pounds	35	SAND CREEK
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	2006	Pounds	35	SAND CREEK
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	2005	Pounds	19	SAND CREEK
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	2004	Pounds	28	SAND CREEK
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	2003	Pounds	53	SAND CREEK
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	2002	Pounds	9	SAND CREEK
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	2001	Pounds	5	SAND CREEK
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	2000	Pounds	5	SAND CREEK
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	1999	Pounds	10	SAND CREEK
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	1998	Pounds	102	SAND CREEK
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	1997	Pounds	66	SAND CREEK
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	1996	Pounds	20	SAND CREEK

POLYCYCLIC AROMATIC COMPOUNDS (TRI Chemical ID: N590)	1995	Pounds	250	SAND CREEK
SODIUM SULFATE (SOLUTION) (TRI Chemical ID: 007757826)	1987	Pounds	100000	BURLINGTON DITCH TO SAND CREEK
SODIUM SULFATE (SOLUTION) (TRI Chemical ID: 007757826)	1987	Pounds	320000	SAND CREEK
STYRENE (TRI Chemical ID: 000100425)	1987	Pounds	250	BURLINGTON DITCH TO SAND CREEK
STYRENE (TRI Chemical ID: 000100425)	1987	Pounds	250	SAND CREEK
TOLUENE (TRI Chemical ID: 000108883)	2010	Pounds	1	SAND CREEK
TOLUENE (TRI Chemical ID: 000108883)	2009	Pounds	15	SAND CREEK
TOLUENE (TRI Chemical ID: 000108883)	2008	Pounds	198	SAND CREEK
TOLUENE (TRI Chemical ID: 000108883)	1995	Pounds	5	SAND CREEK
TOLUENE (TRI Chemical ID: 000108883)	1994	Pounds	5	SAND CREEK
TOLUENE (TRI Chemical ID: 000108883)	1993	Pounds	6	SAND CREEK
TOLUENE (TRI Chemical ID: 000108883)	1992	Pounds	1	SAND CREEK
TOLUENE (TRI Chemical ID: 000108883)	1991	Pounds	3	SAND CREEK
TOLUENE (TRI Chemical ID: 000108883)	1990	Pounds	3	SAND CREEK
TOLUENE (TRI Chemical ID: 000108883)	1989	Pounds	3	SAND CREEK
TOLUENE (TRI Chemical ID: 000108883)	1988	Pounds	55	SAND CREEK
TOLUENE (TRI Chemical ID: 000108883)	1987	Pounds	3	SAND CREEK
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	2010	Pounds	18	SAND CREEK
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	2009	Pounds	24	SAND CREEK
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	2008	Pounds	329	SAND CREEK
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1995	Pounds	7	SAND CREEK
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1994	Pounds	6	SAND CREEK
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1993	Pounds	7	SAND CREEK
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1992	Pounds	4	SAND CREEK
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1991	Pounds	3	SAND CREEK
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1990	Pounds	3	SAND CREEK
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1989	Pounds	3	SAND CREEK
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1988	Pounds	120	SAND CREEK
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1987	Pounds	3	SAND CREEK

Transfer of Chemicals to Off-Site Locations other than POTWs:

Please note that transfer amounts are not included in release totals shown above. For all releases estimated as a range, the mid-point of the range was used in these calculations. Rows with Total Transfer Amount equal to "0" were not listed.

<u>Chemical Name</u>	<u>Year</u>	<u>Unit Of Measure</u>	<u>Total Transfer Amount</u>	<u>Transfer Site Name and Address</u>	<u>Type Of Waste Management</u>
<u>1,2,4-TRIMETHYLBENZENE</u> (TRI Chemical ID: 000095636)	2010	Pounds	4.1	CLEAN HARBORS ENVIRONMENTAL SERVICES 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
<u>1,2,4-TRIMETHYLBENZENE</u> (TRI Chemical ID: 000095636)	2009	Pounds	9.7	CLEAN HARBORS ENVIRONMENTAL SERVICES 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
<u>1,2,4-TRIMETHYLBENZENE</u> (TRI Chemical ID: 000095636)	2008	Pounds	2	SYSTECH ENVIRONMENTAL 1420 S. CEMENT ROAD FREDONIA, KS 66736	Energy Recovery
<u>1,2,4-TRIMETHYLBENZENE</u> (TRI Chemical ID: 000095636)	2008	Pounds	34.9	CLEAN HARBORS DEER TRAIL LLC 109556 EAST HIGHWAY 36 DEER TRAIL, CO 80105	Other Land Disposal
<u>1,2,4-TRIMETHYLBENZENE</u> (TRI Chemical ID: 000095636)	2008	Pounds	9.1	CLEAN HARBORS ENVIRONMENTAL SV 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
<u>1,2,4-TRIMETHYLBENZENE</u> (TRI Chemical ID: 000095636)	2008	Pounds	1.4	CLEAN HARBORS ARAGONITE LLC 11600 NORTH APTUS ROAD GRANTSVILLE, UT 84029	Incineration/Thermal Treatment
<u>1,2,4-TRIMETHYLBENZENE</u> (TRI Chemical ID: 000095636)	1994	Pounds	25	CHIEF SUPPLY CORP. RTE. 2 BOX 71 HASKELL, OK 74436	Energy Recovery
<u>1,2,4-TRIMETHYLBENZENE</u> (TRI Chemical ID: 000095636)	1993	Pounds	4	ENVIROSAFE SERVICES OF IDAHO 10.5 MI NW OF GRANDVIEW, (MISSI LE BASE ROAD) GRANDVIEW, ID 83705	Landfill/Disposal Surface Impoundment
<u>1,2,4-TRIMETHYLBENZENE</u> (TRI Chemical ID: 000095636)	1993	Pounds	1	ROLLINS ENVIRONMENTAL SERVICES 13351 SCIENIC HWY. BATON ROUGE, LA 70809	Incineration/Thermal Treatment
<u>1,2,4-TRIMETHYLBENZENE</u> (TRI Chemical ID: 000095636)	1993	Pounds	16	CONTINENTAL CEMENT CO. HWY. 79 SOUTH HANNIBAL, MO 63401	Energy Recovery
<u>1,2,4-TRIMETHYLBENZENE</u> (TRI Chemical ID: 000095636)	1992	Pounds	134	CONTINENTAL CEMENT CO. HWY. 79 S. HANNIBAL, MO 63401	Energy Recovery
<u>1,2,4-TRIMETHYLBENZENE</u> (TRI Chemical ID: 000095636)	1992	Pounds	2	ASH GROVE CEMENT CO. N. SANTE FE ST. CHANUTE, KS 66720	Energy Recovery
<u>1,2,4-TRIMETHYLBENZENE</u> (TRI Chemical ID: 000095636)	1991	Pounds	20	ENSCO INC. AMERICAN OIL RD. EL DORADO, AR 71730	Incineration/Insignificant Fuel Value
<u>1,2,4-TRIMETHYLBENZENE</u> (TRI Chemical ID: 000095636)	1991	Pounds	240	ASH GROVE CEMENT CO. N. SANTA FE ST. CHANUTE, KS 66720	Energy Recovery
<u>1,2,4-TRIMETHYLBENZENE</u> (TRI Chemical ID: 000095636)	1991	Pounds	1500	ENVIROSAFE SERVICES OF IDAHO 10 1/2 MILES NW OF GRANDVIEW, (MISSILE BASE ROAD) GRANDVIEW, ID 83705	Landfill/Disposal Surface Impoundment
<u>1,2,4-TRIMETHYLBENZENE</u> (TRI Chemical ID: 000095636)				USPCI-GRASSY MOUNTAIN FACILITY	

<u>1,2,4-TRIMETHYLBENZENE</u> (TRI Chemical ID: 000095636)	1990	Pounds	250	3 MI E. & 7 MI NORTH OF EXI 41, OFF I80 CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
<u>1,2,4-TRIMETHYLBENZENE</u> (TRI Chemical ID: 000095636)	1989	Pounds	330	USPCI-GRASSY MTN. FACILITY 3 MI. EAST & 7 MI. NORTH OF, EXIT 41/(OFF I-80) CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
<u>1,2,4-TRIMETHYLBENZENE</u> (TRI Chemical ID: 000095636)	1989	Pounds	260	CSI 2095 WEST 60TH AVENUE DENVER, CO 80216	Landfill/Disposal Surface Impoundment
<u>1,2,4-TRIMETHYLBENZENE</u> (TRI Chemical ID: 000095636)	1988	Pounds	42	CSI 2095 WEST 60TH AVE. DENVER, CO 80216	Landfill/Disposal Surface Impoundment
<u>1,2,4-TRIMETHYLBENZENE</u> (TRI Chemical ID: 000095636)	1988	Pounds	1200	USPCI-GRASSY MTN. FACILITY 3 MI E. & 7 MI N. OF EXIT 41, (OFF I-80) CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
<u>1,2,4-TRIMETHYLBENZENE</u> (TRI Chemical ID: 000095636)	1987	Pounds	290	CONOCO, INC. 1000 SOUTH PINE PONCA CITY, OK 746030000	Land Treatment
<u>2-METHOXYETHANOL</u> (TRI Chemical ID: 000109864)	1987	Pounds	250	CONOCO, INC. 1000 SOUTH PINE PONCA CITY, OK 746030000	Land Treatment
<u>2-METHOXYETHANOL</u> (TRI Chemical ID: 000109864)	1987	Pounds	250	CSI 2095 WEST 60TH AVENUE DENVER, CO 802160000	Landfill/Disposal Surface Impoundment
<u>ALUMINUM OXIDE (FIBROUS FORMS)</u> (TRI Chemical ID: 001344281)	1988	Pounds	510000	CSI 2095 WEST 60TH AVE. DENVER, CO 80216	Landfill/Disposal Surface Impoundment
<u>ALUMINUM OXIDE (FIBROUS FORMS)</u> (TRI Chemical ID: 001344281)	1987	Pounds	470000	CSI 2095 WEST 60TH AVENUE DENVER, CO 802160000	Landfill/Disposal Surface Impoundment
<u>AMMONIA</u> (TRI Chemical ID: 007664417)	2008	Pounds	55	CLEAN HARBORS ARAGONITE LLC 11600 NORTH APTUS ROAD GRANTSVILLE, UT 84029	Incineration/Thermal Treatment
<u>AMMONIA</u> (TRI Chemical ID: 007664417)	1993	Pounds	83	CONSERVATION SERVICES INC. 2090 EAST 104TH AVE. DENVER, CO 80233	Landfill/Disposal Surface Impoundment
<u>AMMONIA</u> (TRI Chemical ID: 007664417)	1992	Pounds	11	CONTINENTAL CEMENT CO. HWY. 79 S. HANNIBAL, MO 63401	Energy Recovery
<u>AMMONIA</u> (TRI Chemical ID: 007664417)	1992	Pounds	13	ENVIROSAFE SERVICES OF IDAHO 10-1/2 MILES NW OF GRANDVIEW, MISSLE BASE RD. GRANVIEW, ID 83705	Landfill/Disposal Surface Impoundment
<u>AMMONIA</u> (TRI Chemical ID: 007664417)	1991	Pounds	99	ENVIROSAFE SERVICES OF IDAHO 10 1/2 MILES NW OF GRANDVIEW, (MISSILE BASE ROAD) GRANDVIEW, ID 83705	Landfill/Disposal Surface Impoundment
<u>AMMONIA</u> (TRI Chemical ID: 007664417)	1991	Pounds	3	ASH GROVE CEMENT CO. N. SANTA FE ST. CHANUTE, KS 66720	Energy Recovery
<u>AMMONIA</u> (TRI Chemical ID: 007664417)	1991	Pounds	2	ENSCO INC. AMERICAN OIL RD. EL DORADO, AR 71730	Incineration/Insignificant Fuel Value

AMMONIA (TRI Chemical ID: 007664417)	1990	Pounds	6	USPCI-GRASSY MOUNTAIN FACILITY 3 MI E. & 7 MI N. OF EXIT 41, (OFF I-80) CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
AMMONIA (TRI Chemical ID: 007664417)	1989	Pounds	29	USPCI-GRASSY MOUNTAIN FACILITY 3 MI EAST & 7 MI NORTH OF EXIT, 41 (OFF I-80) CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
AMMONIA (TRI Chemical ID: 007664417)	1989	Pounds	21	CSI 2095 WEST 60TH AVE. DENVER, CO 80216	Landfill/Disposal Surface Impoundment
AMMONIA (TRI Chemical ID: 007664417)	1988	Pounds	87	USPCI-GRASSY MOUNTAIN FACILITY 3 MI EAST & 7 MI NORTH OF EXIT, 41 (OFF I80) GRANTSVILLE, UT 84029	Landfill/Disposal Surface Impoundment
AMMONIA (TRI Chemical ID: 007664417)	1988	Pounds	4	CSI 2095 W. 60TH AVE. DENVER, CO 80216	Landfill/Disposal Surface Impoundment
BENZENE (TRI Chemical ID: 000071432)	2010	Pounds	15.3	CLEAN HARBORS ENVIRONMENTAL SERVICES 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
BENZENE (TRI Chemical ID: 000071432)	2010	Pounds	3.2	RINECO CHEMICAL 1007 VULCAN ROAD BENTON, AR 720158982	Other Landfills
BENZENE (TRI Chemical ID: 000071432)	2009	Pounds	36.7	CLEAN HARBORS ENVIRONMENTAL SERVICES 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
BENZENE (TRI Chemical ID: 000071432)	2008	Pounds	5	CONSERVATION SERVICES INC. 41800 E. 99TH AVENUE BENNETT, CO 80102	Land Treatment
BENZENE (TRI Chemical ID: 000071432)	2008	Pounds	5	CLEAN HARBORS ARAGONITE LLC 11600 NORTH APTUS ROAD GRANTSVILLE, UT 84029	Incineration/Thermal Treatment
BENZENE (TRI Chemical ID: 000071432)	2008	Pounds	59.7	CLEAN HARBORS DEER TRAIL LLC 109556 EAST HIGHWAY 36 DEER TRAIL, CO 80105	Incineration/Thermal Treatment
BENZENE (TRI Chemical ID: 000071432)	2008	Pounds	35.3	SYSTECH ENVIRONMENTAL 1420 S. CEMENT ROAD FREDONIA, KS 66736	Energy Recovery
BENZENE (TRI Chemical ID: 000071432)	2008	Pounds	5	CLEAN HARBORS ENVIRONMENTAL SV 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
BENZENE (TRI Chemical ID: 000071432)	2008	Pounds	5	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80018	Other Landfills
BENZENE (TRI Chemical ID: 000071432)	2007	Pounds	5	CONSERVATION SERVICES INC. 41800 E. 99TH AVENUE BENNETT, CO 80102	Land Treatment
BENZENE (TRI Chemical ID: 000071432)	2007	Pounds	5	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Other Landfills
BENZENE (TRI Chemical ID: 000071432)	2007	Pounds	5	CLEAN HARBORS ENVIRONMENTAL SV 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value

BENZENE (TRI Chemical ID: 000071432)	2006	Pounds	5	CLEAN HARBORS ENVIRONMENTAL SV 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
BENZENE (TRI Chemical ID: 000071432)	2006	Pounds	5	CONSERVATION SERVICES INC. 41800 E. 99TH AVENUE BENNETT, CO 80102	Land Treatment
BENZENE (TRI Chemical ID: 000071432)	2006	Pounds	5	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Other Landfills
BENZENE (TRI Chemical ID: 000071432)	2005	Pounds	.23	CLEAN HARBORS ENVIRONMENTAL SV 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
BENZENE (TRI Chemical ID: 000071432)	2005	Pounds	3.31	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Other Landfills
BENZENE (TRI Chemical ID: 000071432)	2004	Pounds	5	CLEAN HARBORS ENVIRONMENTAL SV 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
BENZENE (TRI Chemical ID: 000071432)	2004	Pounds	5	CONSERVATION SERVICES INC. 41800 E. 99TH AVENUE BENNETT, CO 80102	Other Landfills
BENZENE (TRI Chemical ID: 000071432)	2004	Pounds	5	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Other Landfills
BENZENE (TRI Chemical ID: 000071432)	2003	Pounds	6.07	CHEMICAL WASTE MANAGEMENT 7170 JOHN BRANNON RD. SULPHUR, LA 70665	Energy Recovery
BENZENE (TRI Chemical ID: 000071432)	2002	Pounds	2.42	SYSTECH ENV CORPORATION P. O. BOX 111 SOUTH CEMENT ROAD FREDONIA, KS 66736	Energy Recovery
BENZENE (TRI Chemical ID: 000071432)	2002	Pounds	5	CLEAN HARBORS ENV SERVICES HIGHWAY 71 5 MILES S OF KIMBALL KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
BENZENE (TRI Chemical ID: 000071432)	2002	Pounds	5.49	CHEMICAL WASTE MANAGEMENT 7170 JOHN BRANNON RD. SULPHUR, LA 70665	Energy Recovery
BENZENE (TRI Chemical ID: 000071432)	2001	Pounds	5	CLEAN HARBORS ENV SERVICES 5 MILES SOUTH OF KIMBALL ON HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
BENZENE (TRI Chemical ID: 000071432)	2001	Pounds	5	CS METALS OF LOUISIANA 7591 HWY 3214 CONVENT, LA 70723	Metals Recovery
BENZENE (TRI Chemical ID: 000071432)	2001	Pounds	5	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CA 80013	Landfill/Disposal Surface Impoundment
BENZENE (TRI Chemical ID: 000071432)	2000	Pounds	5	CLEAN HARBORS ENVIRONMENTAL SERVICES, INC. 5 MILES SOUTH OF KIMBALL ON HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
BENZENE (TRI Chemical ID: 000071432)	2000	Pounds	5	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Landfill/Disposal Surface Impoundment

BENZENE (TRI Chemical ID: 000071432)	2000	Pounds	5	CALGON CARBON ROUTE 23 (THE STREET ADDRESS) CATLETTSBURG, KY 41129	Other Reuse or Recovery
BENZENE (TRI Chemical ID: 000071432)	2000	Pounds	5	CS METALS OF LOUISIANA 7591 HIGHWAY 3214 CONVENT, LA 70723	Other Waste Treatment
BENZENE (TRI Chemical ID: 000071432)	1999	Pounds	5	DURATHERM, INC. 2700 AVENUE SOUTH SAN LEON, TX 77539	Other Reuse or Recovery
BENZENE (TRI Chemical ID: 000071432)	1999	Pounds	5	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Landfill/Disposal Surface Impoundment
BENZENE (TRI Chemical ID: 000071432)	1999	Pounds	5	CALGON CARBON U.S. RTE. 23 CATLETTSBURG, KY 41129	Other Reuse or Recovery
BENZENE (TRI Chemical ID: 000071432)	1998	Pounds	5	GULF CHEMICAL & METALL 302 MIDWAY ROAD FREEPORT, TX 77541	Other Reuse or Recovery
BENZENE (TRI Chemical ID: 000071432)	1997	Pounds	5	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB RD. AURORA, CO 80013	Landfill/Disposal Surface Impoundment
BENZENE (TRI Chemical ID: 000071432)	1997	Pounds	5	CALGON CARBON RTE. 23 CATLETTSBURG, KY 41129	Other Reuse or Recovery
BENZENE (TRI Chemical ID: 000071432)	1997	Pounds	19	GULF CHEMICAL & METALLURGICAL 302 MIDWAY RD. FREEPORT, TX 77541	Other Reuse or Recovery
BENZENE (TRI Chemical ID: 000071432)	1997	Pounds	5	CLEAN HARBORS HWY. 71, 5 MI S OF KIMBALL KIMBALL, NE 69145	Incineration/Thermal Treatment
BENZENE (TRI Chemical ID: 000071432)	1997	Pounds	5	SABINE RIVER WORKS FM 1006 ORANGE, TX 77630	Incineration/Thermal Treatment
BENZENE (TRI Chemical ID: 000071432)	1996	Pounds	27	CALGON CARGON RTE. 23 CATLETTSBURG, KY 41129	Incineration/Thermal Treatment
BENZENE (TRI Chemical ID: 000071432)	1996	Pounds	33	CLEAN HARBORS HWY. 51 5 MILES S. KIMBALL, NE 69145	Incineration/Thermal Treatment
BENZENE (TRI Chemical ID: 000071432)	1995	Pounds	6	DUPONT SABINE RIVER WORKS SABINE REGIONAL INCINERATOR FM, 1006 ORANGE, TX 77630	Incineration/Thermal Treatment
BENZENE (TRI Chemical ID: 000071432)	1995	Pounds	1	LAIDLAW DENVER LANDFILL #534 1441 WELD COUNTY RD. SIX/ P., O. BOX 320 ERIE, CO 80516	Landfill/Disposal Surface Impoundment
BENZENE (TRI Chemical ID: 000071432)	1995	Pounds	59	CLEAN HARBORS TECHNOLOGY CORPO, RATION HWY. 71, 5 MILES SOUTH OF K, IMBALL KIMBALL, NE 69145	Incineration/Thermal Treatment
				SAFETY-KLEEN CORP.-TEXAS	

BENZENE (TRI Chemical ID: 000071432)	1994	Pounds	7	1722 COOPER CREEK RD. DENTON, TX 76201	Solvents/Organics Recovery
BENZENE (TRI Chemical ID: 000071432)	1994	Pounds	40	CHIEF SUPPLY CORP. RTE. 2 BOX 71 HASKELL, OK 74436	Energy Recovery
BENZENE (TRI Chemical ID: 000071432)	1994	Pounds	2	CONSERVATION SERVICES INC. 2090 EAST 104TH ST. DENVER, CO 80233	Landfill/Disposal Surface Impoundment
BENZENE (TRI Chemical ID: 000071432)	1994	Pounds	6	ENVIROSAFE SERVICES OF IDAHO 10.5 MI NW OF GRANDVIEW, (MISSILE BASE ROAD) GRANDVIEW, ID 83705	Landfill/Disposal Surface Impoundment
BENZENE (TRI Chemical ID: 000071432)	1993	Pounds	28	SAFETY-KLEEN CORP. -TEXAS 1722 COOPER CREEK RD. DENTON, TX 76201	Solvents/Organics Recovery
BENZENE (TRI Chemical ID: 000071432)	1993	Pounds	130	ENVIROSAFE SERVICES OF IDAHO 10.5 MI NW OF GRANDVIEW, (MISSILE BASE ROAD) GRANDVIEW, ID 83705	Landfill/Disposal Surface Impoundment
BENZENE (TRI Chemical ID: 000071432)	1993	Pounds	1	ROLLINS ENVIRONMENTAL SERVICES 13351 SCIENIC HWY. BATON ROUGE, LA 70809	Incineration/Thermal Treatment
BENZENE (TRI Chemical ID: 000071432)	1993	Pounds	16	CONTINENTAL CEMENT CO. HWY. 79 SOUTH HANNIBAL, MO 63401	Energy Recovery
BENZENE (TRI Chemical ID: 000071432)	1992	Pounds	2	ASH GROVE CEMENT CO. N. SANTA FE ST. CHANUTE, KS 66720	Energy Recovery
BENZENE (TRI Chemical ID: 000071432)	1992	Pounds	130	CONTINENTAL CEMENT CO. HWY. 79 S. HANNIBAL, MO 63401	Energy Recovery
BENZENE (TRI Chemical ID: 000071432)	1992	Pounds	31	SAFETY-KLEEN CORP. -TEXAS 1722 COOPER CREEK RD. DENTON, TX 76201	Solvents/Organics Recovery
BENZENE (TRI Chemical ID: 000071432)	1992	Pounds	270	ENVIORSAFE SERVICES OF IDAHO 10-1/2 MILES NW OF GRANDVIEW, MISSILE BASE RD. GRANDVIEW, ID 83705	Landfill/Disposal Surface Impoundment
BENZENE (TRI Chemical ID: 000071432)	1992	Pounds	1	SAFETY-KLEEN CORP-ILLINOIS 633 E. 138TH ST. DOLTON, IL 60419	Solvents/Organics Recovery
BENZENE (TRI Chemical ID: 000071432)	1991	Pounds	11	OIL & SOLVENT PROCESS CO. 9131 E. 96TH AVE. HENDERSON, CO 80640	Other Reuse or Recovery
BENZENE (TRI Chemical ID: 000071432)	1991	Pounds	60	ASH GROVE CEMENT CO. N. SANTA FE ST. CHANUTE, KS 66720	Energy Recovery
BENZENE (TRI Chemical ID: 000071432)	1991	Pounds	38	ENSCO INC. AMERICAN OIL RD. EL DORADO, AR 71730	Incineration/Insignificant Fuel Value
BENZENE (TRI Chemical ID: 000071432)	1991	Pounds	48	SAFETY-KLEEN CORP. 633 E. 138TH ST. DOLTON, IL 60419	Other Reuse or Recovery

<u>BENZENE</u> (TRI Chemical ID: 000071432)	1991	Pounds	380	ENVIROSAFE SERVICES OF IDAHO 10 1/2 MILE NW OF GRANDVIEW, (MISSILE BASE ROAD) GRANDVIEW, ID 83705	Landfill/Disposal Surface Impoundment
<u>BENZENE</u> (TRI Chemical ID: 000071432)	1991	Pounds	20	SAFETY-KLEEN CORP. STATE HWY. 146 NEW CASTLE, KY 40050	Solvents/Organics Recovery
<u>BENZENE</u> (TRI Chemical ID: 000071432)	1991	Pounds	29	SAFETY-KLEEN CORP. 2801 S. TEJON ENGLEWOOD, CO 80110	Solvents/Organics Recovery
<u>BENZENE</u> (TRI Chemical ID: 000071432)	1990	Pounds	210	USPCI-GRASSY MOUNTAIN FACILITY 3 MI & 7 MI NORTH OF EXIT 41, OFF I80 CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
<u>BENZENE</u> (TRI Chemical ID: 000071432)	1989	Pounds	95	USPCI-GRASSY MTN. FACILITY 3 MI. EAST & 7 MI. NORTH OF EX, IT 41/(OFF I-80) CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
<u>BENZENE</u> (TRI Chemical ID: 000071432)	1989	Pounds	130	CSI 2095 WEST 60TH AVENUE DENVER, CO 80216	Landfill/Disposal Surface Impoundment
<u>BENZENE</u> (TRI Chemical ID: 000071432)	1988	Pounds	25	CSI 2095 WEST 60TH AVE. DENVER, CO 80216	Landfill/Disposal Surface Impoundment
<u>BENZENE</u> (TRI Chemical ID: 000071432)	1988	Pounds	300	USPCI-GRASSY MTN. FACILITY 3 MI E. & 7 MI N. OF EXIT 41, (OFF I-80) CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
<u>BENZENE</u> (TRI Chemical ID: 000071432)	1987	Pounds	92	CONOCO, INC. 1000 SOUTH PINE PONCA CITY, OK 746030000	Land Treatment
<u>BENZENE</u> (TRI Chemical ID: 000071432)	1987	Pounds	10	CSI 2095 WEST 60TH AVENUE DENVER, CO 802160000	Landfill/Disposal Surface Impoundment
<u>BENZO(G,H,I)PERYLENE</u> (TRI Chemical ID: 000191242)	2001	Pounds	1.5	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CA 80013	Landfill/Disposal Surface Impoundment
<u>BENZO(G,H,I)PERYLENE</u> (TRI Chemical ID: 000191242)	2000	Pounds	3.4	CLEAN HARBORS ENVIRONMENTAL SERVICES, INC. 5 MILES SOUTH OF KIMBALL ON HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
<u>BENZO(G,H,I)PERYLENE</u> (TRI Chemical ID: 000191242)	2000	Pounds	2.4	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Landfill/Disposal Surface Impoundment
<u>BIPHENYL</u> (TRI Chemical ID: 000092524)	1987	Pounds	250	CONOCO, INC. 1000 SOUTH PINE PONCA CITY, OK 746030000	Land Treatment
<u>BIPHENYL</u> (TRI Chemical ID: 000092524)	1987	Pounds	250	USPCI-GRASSY MTN. FACILITY 3 MI EAST & 7 MI NORTH EXIT 41, OFF I-80 CLIVE, UT 840290000	Landfill/Disposal Surface Impoundment
<u>BIPHENYL</u> (TRI Chemical ID: 000092524)	1987	Pounds	250	CSI 2095 WEST 60TH AVENUE DENVER, CO 802160000	Landfill/Disposal Surface Impoundment
<u>COBALT COMPOUNDS</u> (TRI Chemical ID: N096)	2008	Pounds	22909	CLEAN HARBORS ENVIRONMENTAL SV 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Other Off-Site Management

COBALT COMPOUNDS (TRI Chemical ID: N096)	2008	Pounds	657.6	CATALYST RECOVERY OF LA, LLC 100 AMERICAN BLVD. LAFAYETTE, LA 70508	Metals Recovery
COBALT COMPOUNDS (TRI Chemical ID: N096)	2007	Pounds	250	CATALYST RECOVERY OF LA, LLC 100 AMERICAN BLVD. LAFAYETTE, LA 70508	Metals Recovery
COBALT COMPOUNDS (TRI Chemical ID: N096)	2007	Pounds	5	CLEAN HARBORS ENVIRONMENTAL SV 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Other Off-Site Management
COBALT COMPOUNDS (TRI Chemical ID: N096)	2006	Pounds	66	CHEMICAL WASTE MANAGEMENT 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812	Solidification/Stabilization-Metals and Metal Compounds only
COBALT COMPOUNDS (TRI Chemical ID: N096)	2005	Pounds	61	CHEMICAL WASTE MANAGEMENT 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812	Solidification/Stabilization-Metals and Metal Compounds only
COBALT COMPOUNDS (TRI Chemical ID: N096)	2004	Pounds	117	CHEMICAL WASTE MANAGEMENT 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812	Solidification/Stabilization-Metals and Metal Compounds only
COBALT COMPOUNDS (TRI Chemical ID: N096)	2002	Pounds	5674	CHEMICAL WASTE MANAGEMENT 7170 JOHN BRANNON RD. SULPHUR, LA 70665	Solidification/Stabilization-Metals and Metal Compounds only
CUMENE (TRI Chemical ID: 000098828)	2008	Pounds	.1	SYSTECH ENVIRONMENTAL 1420 S. CEMENT ROAD FREDONIA, KS 66736	Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	2008	Pounds	4	CLEAN HARBORS DEER TRAIL LLC 109556 EAST HIGHWAY 36 DEER TRAIL, CO 80105	Incineration/Thermal Treatment
CUMENE (TRI Chemical ID: 000098828)	2008	Pounds	.3	CLEAN HARBORS ARAGONITE LLC 11600 NORTH APTUS ROAD GRANTSVILLE, UT 84029	Incineration/Thermal Treatment
CUMENE (TRI Chemical ID: 000098828)	2008	Pounds	1.9	CLEAN HARBORS ENVIRONMENTAL SV 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Thermal Treatment
CUMENE (TRI Chemical ID: 000098828)	1994	Pounds	25	CHIEF SUPPLY CORP. RTE. 2 BOX 71 HASKELL, OK 74436	Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1993	Pounds	4	ENVIROSAFE SERVICES OF IDAHO 10.5 MI NW OF GRANDVIEW, (MISSI LE BASE ROAD) GRANDVIEW, ID 83705	Landfill/Disposal Surface Impoundment
CUMENE (TRI Chemical ID: 000098828)	1993	Pounds	16	CONTINENTAL CEMENT CO. HWY. 79 SOUTH HANNIBAL, MO 63401	Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1993	Pounds	1	ROLLINS ENVIRONMENTAL SERVICES 13351 SCIENIC HWY. BATON ROUGE, LA 70809	Incineration/Thermal Treatment
CUMENE (TRI Chemical ID: 000098828)	1992	Pounds	130	CONTINENTAL CEMENT CO. HWY. 79 S. HANNIBAL, MO 63401	Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1992	Pounds	2	ASH GROVE CEMENT CO. N. SANTA FE ST. CHANUTE, KS 66720	Energy Recovery

CUMENE (TRI Chemical ID: 000098828)	1991	Pounds	240	ASH GROVE CEMENT CO. N. SANTA FE ST. CHANUTE, KS 66720	Energy Recovery
CUMENE (TRI Chemical ID: 000098828)	1991	Pounds	20	ENSCO INC. AMERICAN OIL RD. EL DORADO, AR 71730	Incineration/Insignificant Fuel Value
CUMENE (TRI Chemical ID: 000098828)	1991	Pounds	1500	ENVIROSAFE SERVICES OF IDAHO 10 1/2 MILE NW OF GRANDVIEW, (MISSILE BASE ROAD) GRANDVIEW, ID 83705	Landfill/Disposal Surface Impoundment
CUMENE (TRI Chemical ID: 000098828)	1990	Pounds	410	USPCI-GRASSY MOUNTAIN FACILITY 3 MI EAST & 7 MI NORTH OF EXIT, 41 OFF 180 CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
CUMENE (TRI Chemical ID: 000098828)	1989	Pounds	260	CSI 2095 WEST 60TH AVENUE DENVER, CO 80216	Landfill/Disposal Surface Impoundment
CUMENE (TRI Chemical ID: 000098828)	1989	Pounds	330	USPCI-GRASSY MTN. FACILITY 3 MI. EAST & 7 MI. NORTH OF EX, IT 41/(OFF I-80) CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
CUMENE (TRI Chemical ID: 000098828)	1988	Pounds	47	CSI 2095 WEST 60TH AVE. DENVER, CO 80216	Landfill/Disposal Surface Impoundment
CUMENE (TRI Chemical ID: 000098828)	1988	Pounds	1200	USPCI-GRASSY MTN. FACILITY 3 MI E. & 7 MI N. OF EXIT 41, (OFF I-80) CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
CUMENE (TRI Chemical ID: 000098828)	1987	Pounds	290	CONOCO, INC. 1000 SOUTH PINE PONCA CITY, OK 746030000	Land Treatment
CUMENE (TRI Chemical ID: 000098828)	1987	Pounds	290	USPCI-GRASSY MTN. FACILITY 3 MI EAST & 7 MI NORTH OF EXIT, 41 OFF I-80 CLIVE, UT 840290000	Landfill/Disposal Surface Impoundment
CYCLOHEXANE (TRI Chemical ID: 000110827)	1994	Pounds	8	CHIEF SUPPLY CORP. RTE. 2 BOX 71 HASKELL, OK 74436	Energy Recovery
CYCLOHEXANE (TRI Chemical ID: 000110827)	1993	Pounds	4	ENVIROSAFE SERVICES OF IDAHO 10.5 MI NW OF GRANDVIEW, (MISSILE BASE ROAD) GRANDVIEW, ID 83705	Landfill/Disposal Surface Impoundment
CYCLOHEXANE (TRI Chemical ID: 000110827)	1993	Pounds	16	CONTINENTAL CEMENT CO. HWY. 79 SOUTH HANNIBAL, MO 63401	Energy Recovery
CYCLOHEXANE (TRI Chemical ID: 000110827)	1993	Pounds	1	ROLLINS ENVIRONMENTAL SERVICES 13351 SCIENIC HWY. BATON ROUGE, LA 70809	Incineration/Thermal Treatment
CYCLOHEXANE (TRI Chemical ID: 000110827)	1992	Pounds	130	CONTINENTAL CEMENT CO. HWY. 79 S. HANNIBAL, MO 63401	Energy Recovery
CYCLOHEXANE (TRI Chemical ID: 000110827)	1992	Pounds	2	ASH GROVE CEMENT CO. N. SANTA FE ST. CHANUTE, KS 66720	Energy Recovery
CYCLOHEXANE (TRI Chemical ID: 000110827)	1991	Pounds	38	ENSCO INC. AMERICAN OIL RD. EL DORADO, AR 71730	Incineration/Insignificant Fuel Value

(TRI Chemical ID: 000110827)				EL DORADO, AR 71730	
CYCLOHEXANE (TRI Chemical ID: 000110827)	1991	Pounds	20	SAFETY-KLEEN CORP. STATE HWY. 146 NEW CASTLE, KY 40050	Solvents/Organics Recovery
CYCLOHEXANE (TRI Chemical ID: 000110827)	1991	Pounds	29	SAFETY-KLEEN CORP. 2801 S. TEJON ENGLEWOOD, CO 80110	Solvents/Organics Recovery
CYCLOHEXANE (TRI Chemical ID: 000110827)	1991	Pounds	48	SAFETY-KLEEN CORP. 633 E. 138TH ST. DOLTON, IL 60419	Other Reuse or Recovery
CYCLOHEXANE (TRI Chemical ID: 000110827)	1991	Pounds	11	OIL & SOLVENT PROCESS CO. 9131 E. 96TH AVE. HENDERSON, CO 80640	Other Reuse or Recovery
CYCLOHEXANE (TRI Chemical ID: 000110827)	1991	Pounds	75	ASH GROVE CEMENT CO. N. SANTA FE ST. CHANUTE, KS 66720	Energy Recovery
CYCLOHEXANE (TRI Chemical ID: 000110827)	1991	Pounds	470	ENVIROSAFE SERVICES OF IDAHO 10 1/2 MILES NW OF GRANDVIEW, (MISSILE BASE ROAD) GRANDVIEW, ID 83705	Landfill/Disposal Surface Impoundment
CYCLOHEXANE (TRI Chemical ID: 000110827)	1990	Pounds	180	USPCI-GRASSY MOUNTAIN FACILITY 3 MI EAST & 7 MI NORTH OF EXIT, 41 OFF 180 CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
CYCLOHEXANE (TRI Chemical ID: 000110827)	1989	Pounds	260	CSI 2095 WEST 60TH AVENUE DENVER, CO 80216	Landfill/Disposal Surface Impoundment
CYCLOHEXANE (TRI Chemical ID: 000110827)	1989	Pounds	110	USPCI-GRASSY MTN. FACILITY 3 MI. EAST & 7 MI. NORTH OF EX, IT 41/(OFF I-80) CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
CYCLOHEXANE (TRI Chemical ID: 000110827)	1988	Pounds	370	USPCI-GRASSY MTN. FACILITY 3 MI E. & 7 MI N. OF EXIT 41, (OFF I-80) CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
CYCLOHEXANE (TRI Chemical ID: 000110827)	1988	Pounds	46	CSI 2095 WEST 60TH AVE. DENVER, CO 80216	Landfill/Disposal Surface Impoundment
CYCLOHEXANE (TRI Chemical ID: 000110827)	1987	Pounds	110	CONOCO, INC 1000 SOUTH PINE PONCA CITY, OK 746030000	Land Treatment
DIOXIN AND DIOXIN-LIKE COMPOUNDS (TRI Chemical ID: N150)	2000	Grams	.0012	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Landfill/Disposal Surface Impoundment
ETHYLBENZENE (TRI Chemical ID: 000100414)	2010	Pounds	10.6	CLEAN HARBORS ENVIRONMENTAL SERVICES 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
ETHYLBENZENE (TRI Chemical ID: 000100414)	2010	Pounds	1.8	RINECO CHEMICAL 1007 VULCAN ROAD BENTON, AR 720158982	Other Landfills
ETHYLBENZENE (TRI Chemical ID: 000100414)	2009	Pounds	25.3	CLEAN HARBORS ENVIRONMENTAL SERVICES 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
ETHYLBENZENE (TRI Chemical ID: 000100414)				CONSERVATION SERVICES INC. 11000 S. GARDEN AVENUE DENVER, CO 80231	

<u>ETHYLBENZENE</u> (TRI Chemical ID: 000100414)	2008	Pounds	5	41800 E. 99TH AVENUE BENNETT, CO 80102	Land Treatment
<u>ETHYLBENZENE</u> (TRI Chemical ID: 000100414)	2008	Pounds	5	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80018	Other Landfills
<u>ETHYLBENZENE</u> (TRI Chemical ID: 000100414)	2007	Pounds	5	CONSERVATION SERVICES INC. 41800 E. 99TH AVENUE BENNETT, CO 80102	Land Treatment
<u>ETHYLBENZENE</u> (TRI Chemical ID: 000100414)	2007	Pounds	5	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Other Landfills
<u>ETHYLBENZENE</u> (TRI Chemical ID: 000100414)	2006	Pounds	5	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Other Landfills
<u>ETHYLBENZENE</u> (TRI Chemical ID: 000100414)	2006	Pounds	5	CONSERVATION SERVICES INC. 41800 E. 99TH AVENUE BENNETT, CO 80102	Land Treatment
<u>ETHYLBENZENE</u> (TRI Chemical ID: 000100414)	2005	Pounds	5	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Other Landfills
<u>ETHYLBENZENE</u> (TRI Chemical ID: 000100414)	2004	Pounds	5	CONSERVATION SERVICES INC. 41800 E. 99TH AVENUE BENNETT, CO 80102	Other Landfills
<u>ETHYLBENZENE</u> (TRI Chemical ID: 000100414)	2004	Pounds	5	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Other Landfills
<u>ETHYLBENZENE</u> (TRI Chemical ID: 000100414)	2003	Pounds	3.23	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Other Landfills
<u>ETHYLBENZENE</u> (TRI Chemical ID: 000100414)	2002	Pounds	.11	CHEMICAL WASTE MANAGEMENT 7170 JOHN BRANNON RD. SULPHUR, LA 70665	Energy Recovery
<u>ETHYLBENZENE</u> (TRI Chemical ID: 000100414)	2001	Pounds	1	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CA 80013	Landfill/Disposal Surface Impoundment
<u>ETHYLBENZENE</u> (TRI Chemical ID: 000100414)	2000	Pounds	5	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Landfill/Disposal Surface Impoundment
<u>ETHYLBENZENE</u> (TRI Chemical ID: 000100414)	1994	Pounds	49	CHIEF SUPPLY CORP. RTE. 2 BOX 71 HASKELL, OK 74436	Energy Recovery
<u>ETHYLBENZENE</u> (TRI Chemical ID: 000100414)	1994	Pounds	17	SAFETY-KLEEN CORP. - COLORADO 2801 SOUTH TEJON ENGLEWOOD, CO 80110	Solvents/Organics Recovery
<u>ETHYLBENZENE</u> (TRI Chemical ID: 000100414)	1994	Pounds	7	SAFETY-KLEEN CORP. TEXAS 1722 COOPER CREEK RD. DENTON, TX 76201	Solvents/Organics Recovery
<u>ETHYLBENZENE</u> (TRI Chemical ID: 000100414)	1994	Pounds	6	CONSERVATION SERVICES INC. 2090 EAST 104TH ST. DENVER, CO 80233	Landfill/Disposal Surface Impoundment
				ENVIROSAFE SERVICES OF IDAHO	

ETHYLBENZENE (TRI Chemical ID: 000100414)	1993	Pounds	4	10.5 MI NW OF GRANDVIEW, (MISSI LE BASE ROAD) GRANDVIEW, ID 83705	Landfill/Disposal Surface Impoundment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1993	Pounds	28	SAFETY-KLEEN CORP.-TEXAS 1722 COOPER CREEK RD. DENTON, TX 76201	Solvents/Organics Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1993	Pounds	1	ROLLINS ENVIRONMENTAL SERVICES 13351 SCIENIC HWY. BATON ROUGE, LA 70809	Metals Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1993	Pounds	16	CONTINENTAL CEMENT CO. HWY. 79 SOUTH HANNIBAL, MO 63401	Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1993	Pounds	2	CONSERVATION SERVICES INC. 2090 EAST 104TH AVE. DENVER, CO 80233	Landfill/Disposal Surface Impoundment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1993	Pounds	26	SAFETY-KLEEN CORP.-COLORADO 2801 SOUTH TEJON ENGLEWOOD, CO 80110	Solvents/Organics Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1992	Pounds	25	SAFETY-KLEEN CORP. -COLORADO 2801 S. TEJON ENGLEWOOD, CO 80110	Solvents/Organics Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1992	Pounds	31	SAFETY-KLEEN CORP. -TEXAS 1722 COOPER CREEK RD. DENTON, TX 76201	Solvents/Organics Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1992	Pounds	1	SAFETY-KLEEN CORP. - ILLINOIS 633 E. 138TH ST. DOLTON, IL 60419	Solvents/Organics Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1992	Pounds	44	CONTINENTAL CEMENT CO. HWY. 79 S. HANNIBAL, MO 63401	Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1992	Pounds	2	ASH GROVE CEMENT CO. N. SANTA FE ST. CHANUTE, KS 66720	Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1991	Pounds	20	SAFETY-KLEEN CORP. STATE HWY. 146 NEW CASTLE, KY 40050	Solvents/Organics Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1991	Pounds	29	SAFETY-KLEEN CORP. 2801 S. TEJON ENGLEWOOD, CO 80110	Solvents/Organics Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1991	Pounds	48	SAFETY-KLEEN CORP. 633 E. 138TH ST. DOLTON, IL 60419	Other Reuse or Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1991	Pounds	11	OIL & SOLVENT PROCESS CO. 9131 E. 96TH AVE. HENDERSON, CO 80640	Other Reuse or Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1991	Pounds	120	ASH GROVE CEMENT CO. N. SANTA FE ST. CHANUTE, KS 66720	Energy Recovery
ETHYLBENZENE (TRI Chemical ID: 000100414)	1991	Pounds	24	ENSCO INC. AMERICAN OIL RD. EL DORADO, AR 71730	Incineration/Insignificant Fuel Value

ENVIRONMENTAL SERVICES OF IDAHO

ETHYLBENZENE (TRI Chemical ID: 000100414)	1991	Pounds	740	ENVIRONMENTAL SERVICES OF ARIZONA 10 1/2 MILES NW OF GRANDVIEW, (MISSILE BASE ROAD) GRANDVIEW, ID 83705	Landfill/Disposal Surface Impoundment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1990	Pounds	410	USPCI-GRASSY MOUNTAIN FACILITY 3 MI EAST & 7 MI NORTH OF EXIT, 41 OFF 180 CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1989	Pounds	170	USPCI-GRASSY MTN. FACILITY 3 MI. EAST & 7 MI. NORTH OF EX, IT 41/(OFF I-80) CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1989	Pounds	130	CSI 2095 WEST 60TH AVENUE DENVER, CO 80216	Landfill/Disposal Surface Impoundment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1988	Pounds	24	CSI 2095 WEST 60TH AVE. DENVER, CO 80216	Landfill/Disposal Surface Impoundment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1988	Pounds	570	USPCI-GRASSY MTN. FACILITY 3 MI E. & 7 MI N. OF EXIT 41, (OFF I-80) CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1987	Pounds	20	CSI 2095 WEST 60TH AVENUE DENVER, CO 802160000	Landfill/Disposal Surface Impoundment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1987	Pounds	160	CONOCO, INC 1000 SOUTH PINE PONCA CITY, OK 746030000	Land Treatment
LEAD COMPOUNDS (TRI Chemical ID: N420)	2010	Pounds	28	CLEAN HARBORS ENVIRONMENTAL SERVICES 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Other Off-Site Management
LEAD COMPOUNDS (TRI Chemical ID: N420)	2010	Pounds	1	RINECO CHEMICAL 1007 VULCAN ROAD BENTON, AR 720158982	Other Landfills
LEAD COMPOUNDS (TRI Chemical ID: N420)	2009	Pounds	67	CLEAN HARBORS ENVIRONMENTAL SERVICES 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Other Off-Site Management
LEAD COMPOUNDS (TRI Chemical ID: N420)	2008	Pounds	11.4	SYSTECH ENVIRONMENTAL 1420 S. CEMENT ROAD FREDONIA, KS 66736	Metals Recovery
LEAD COMPOUNDS (TRI Chemical ID: N420)	2008	Pounds	90	CLEAN HARBORS DEER TRAIL LLC 109556 EAST HIGHWAY 36 DEER TRAIL, CO 80105	Solidification/Stabilization-Metals and Metal Compounds only
LEAD COMPOUNDS (TRI Chemical ID: N420)	2008	Pounds	13.1	CLEAN HARBORS ENVIRONMENTAL SV 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Solidification/Stabilization-Metals and Metal Compounds only
LEAD COMPOUNDS (TRI Chemical ID: N420)	2008	Pounds	1.4	CLEAN HARBORS ARAGONITE LLC 11600 NORTH APTUS ROAD GRANTSVILLE, UT 84029	Solidification/Stabilization-Metals and Metal Compounds only
LEAD COMPOUNDS (TRI Chemical ID: N420)	2008	Pounds	20.6	CONSERVATION SERVICES INC. 41800 E. 99TH AVENUE BENNETT, CO 80102	Land Treatment
LEAD COMPOUNDS (TRI Chemical ID: N420)	2001	Pounds	17	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CA 80013	Landfill/Disposal Surface Impoundment

<u>LEAD COMPOUNDS</u> (TRI Chemical ID: N420)	2001	Pounds	.31	US ECOLOGY, IDAHO INCORPORATED PO BOX 400, 10.5 MILES NW HWY 78, LEMLEY R GRAND VIEW, ID 83624	Other Land Disposal
<u>MANGANESE COMPOUNDS</u> (TRI Chemical ID: N450)	1988	Pounds	24	USPCI-GRASSY MTN. FACILITY 3 MI E. & 7 MI N. OF EXIT 41, (OFF I-80) CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
<u>MERCURY COMPOUNDS</u> (TRI Chemical ID: N458)	2002	Pounds	.01	CLEAN HARBORS ENV SERVICES HIGHWAY 71 5 MILES S OF KIMBALL KIMBALL, NE 69145	Other Off-Site Management
<u>MERCURY COMPOUNDS</u> (TRI Chemical ID: N458)	2000	Pounds	2.6	CONSERVATION SERVICES, INC. 41800 E. 99TH AVENUE BENNETT, CO 80102	Other Reuse or Recovery
<u>MERCURY COMPOUNDS</u> (TRI Chemical ID: N458)	2000	Pounds	.14	CLEAN HARBORS ENVIRONMENTAL SERVICES, INC. 5 MILES SOUTH OF KIMBALL ON HIGHWAY 71 KIMBALL, NE 69145	Metals Recovery
<u>METHYL TERT-BUTYL ETHER</u> (TRI Chemical ID: 001634044)	1988	Pounds	1	USPCI-GRASSY MTN. FACILITY 3 MI E. & 7 MI N. OF EXIT 41, (OFF I-80) CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
<u>MOLYBDENUM TRIOXIDE</u> (TRI Chemical ID: 001313275)	2008	Pounds	2126.2	CATALYST RECOVERY OF LA, LLC 100 AMERICAN BLVD. LAFAYETTE, LA 70508	Metals Recovery
<u>MOLYBDENUM TRIOXIDE</u> (TRI Chemical ID: 001313275)	2008	Pounds	74073.5	CLEAN HARBORS ENVIRONMENTAL SV 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Thermal Treatment
<u>MOLYBDENUM TRIOXIDE</u> (TRI Chemical ID: 001313275)	2007	Pounds	5	CLEAN HARBORS ENVIRONMENTAL SV 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
<u>MOLYBDENUM TRIOXIDE</u> (TRI Chemical ID: 001313275)	2007	Pounds	250	CATALYST RECOVERY OF LA, LLC 100 AMERICAN BLVD. LAFAYETTE, LA 70508	Metals Recovery
<u>MOLYBDENUM TRIOXIDE</u> (TRI Chemical ID: 001313275)	2006	Pounds	250	CHEMICAL WASTE MANAGEMENT 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812	Solidification/Stabilization-Metals and Metal Compounds only
<u>MOLYBDENUM TRIOXIDE</u> (TRI Chemical ID: 001313275)	2005	Pounds	215	CHEMICAL WASTE MANAGEMENT 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812	Solidification/Stabilization-Metals and Metal Compounds only
<u>MOLYBDENUM TRIOXIDE</u> (TRI Chemical ID: 001313275)	2004	Pounds	410	CHEMICAL WASTE MANAGEMENT 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812	Solidification/Stabilization-Metals and Metal Compounds only
<u>MOLYBDENUM TRIOXIDE</u> (TRI Chemical ID: 001313275)	2002	Pounds	18284	CHEMICAL WASTE MANAGEMENT 7170 JOHN BRANNON RD. SULPHUR, LA 70665	Energy Recovery
<u>MOLYBDENUM TRIOXIDE</u> (TRI Chemical ID: 001313275)	1998	Pounds	19879	GULF CHEMICAL & METALLURGY 302 MIDWAY ROAD FREEPORT, TX 77541	Other Reuse or Recovery
<u>MOLYBDENUM TRIOXIDE</u> (TRI Chemical ID: 001313275)	1997	Pounds	13511	GULF CHEMICAL & METALLURGICAL 302 MIDWAY RD. FREEPORT, TX 77541	Other Reuse or Recovery
<u>MOLYBDENUM TRIOXIDE</u> (TRI Chemical ID: 001313275)	1996	Pounds	3666	CHEVRON USA PRODUCTS CO. 6501 TROWBRIDGE DR. EL PASO, TX 79905	Other Reuse or Recovery

MOLYBDENUM TRIOXIDE (TRI Chemical ID: 001313275)	1993	Pounds	16000	AMAX METALS RECOVERY INC. LA HWY. 3137 (RIVER ROAD) BRAITHWAITE, LA 70040	Metals Recovery
MOLYBDENUM TRIOXIDE (TRI Chemical ID: 001313275)	1992	Pounds	16000	CRI 100 AMERICAN BLVD. LAFAYETTE, LA 70508	Metals Recovery
MOLYBDENUM TRIOXIDE (TRI Chemical ID: 001313275)	1991	Pounds	18000	GULF CHEMICAL & METALLURGI, CORP. 302 MIDWAY RD. FREEPORT, TX 77541	Metals Recovery
MOLYBDENUM TRIOXIDE (TRI Chemical ID: 001313275)	1991	Pounds	20000	CRI 100 AMERICAN BLVD. LAFAYETTE, LA 70508	Metals Recovery
MOLYBDENUM TRIOXIDE (TRI Chemical ID: 001313275)	1987	Pounds	250	CSI 2095 WEST 60TH AVENUE DENVER, CO 802160000	Landfill/Disposal Surface Impoundment
MOLYBDENUM TRIOXIDE (TRI Chemical ID: 001313275)	1987	Pounds	250	CONOCO, INC. 1000 SOUTH PINE PONCA CITY, OK 746030000	Land Treatment
NAPHTHALENE (TRI Chemical ID: 000091203)	2010	Pounds	7	CLEAN HARBORS ENVIRONMENTAL SERVICES 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
NAPHTHALENE (TRI Chemical ID: 000091203)	2009	Pounds	17	CLEAN HARBORS ENVIRONMENTAL SERVICES 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
NAPHTHALENE (TRI Chemical ID: 000091203)	2008	Pounds	3.6	SYSTECH ENVIRONMENTAL 1420 S. CEMENT ROAD FREDONIA, KS 66736	Energy Recovery
NAPHTHALENE (TRI Chemical ID: 000091203)	2008	Pounds	59	CLEAN HARBORS DEER TRAIL LLC 109556 EAST HIGHWAY 36 DEER TRAIL, CO 80105	Incineration/Thermal Treatment
NAPHTHALENE (TRI Chemical ID: 000091203)	2008	Pounds	17.8	CLEAN HARBORS ENVIRONMENTAL SV 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Thermal Treatment
NAPHTHALENE (TRI Chemical ID: 000091203)	2008	Pounds	2.7	CLEAN HARBORS ARAGONITE LLC 11600 NORTH APTUS ROAD GRANTSVILLE, UT 84029	Incineration/Thermal Treatment
NAPHTHALENE (TRI Chemical ID: 000091203)	2002	Pounds	14.98	CHEMICAL WASTE MANAGEMENT 7170 JOHN BRANNON RD. SULPHUR, LA 70665	Energy Recovery
NAPHTHALENE (TRI Chemical ID: 000091203)	1994	Pounds	5	CONSERVATION SERVICES INC. 2090 EAST 104TH ST. DENVER, CO 80233	Landfill/Disposal Surface Impoundment
NAPHTHALENE (TRI Chemical ID: 000091203)	1994	Pounds	104	CHIEF SUPPLY CORP. RTE. 2 BOX 71 HASKELL, OK 74436	Energy Recovery
NAPHTHALENE (TRI Chemical ID: 000091203)	1993	Pounds	2	CONTINENTAL CEMENT CO. HWY. 79 SOUTH HANNIBAL, MO 63401	Energy Recovery
NAPHTHALENE (TRI Chemical ID: 000091203)	1993	Pounds	37	CONSERVATION SERVICES INC. 2090 EAST 104TH AVE. DENVER, CO 80223	Landfill/Disposal Surface Impoundment

<u>NAPHTHALENE</u> (TRI Chemical ID: 000091203)	1992	Pounds	26	CONTINENTAL CEMENT CO. HWY. 79 S. HANNIBAL, MO 63401	Energy Recovery
<u>NAPHTHALENE</u> (TRI Chemical ID: 000091203)	1992	Pounds	7	ENVIORSAFE SERVICES OF IDAHO 10-1/2 MILES N.W. OF GRANDVIEW, MISSLE BASE RD. GRANDVIEW, ID 83705	Landfill/Disposal Surface Impoundment
<u>NAPHTHALENE</u> (TRI Chemical ID: 000091203)	1991	Pounds	6400	ENVIORSAFE SERVICES OF IDAHO 10 1/2 MILES NW OF GRADVIEW, (MISSILE BASE ROAD) GRANDVIEW, ID 83705	Landfill/Disposal Surface Impoundment
<u>NAPHTHALENE</u> (TRI Chemical ID: 000091203)	1991	Pounds	4	ENSCO INC. AMERICAN OIL RD. EL DORADO, AR 71730	Incineration/Insignificant Fuel Value
<u>NAPHTHALENE</u> (TRI Chemical ID: 000091203)	1991	Pounds	1000	ASH GROVE CEMENT CO. N. SANTA FE ST. CHANUTE, KS 66720	Energy Recovery
<u>NAPHTHALENE</u> (TRI Chemical ID: 000091203)	1990	Pounds	1700	USPCI-GRASSY MOUNTAIN FACILITY 3 MI EAST & 7 MI NORTH OF EXIT, 41 OFF 180 CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
<u>NAPHTHALENE</u> (TRI Chemical ID: 000091203)	1989	Pounds	260	CSI 2095 WEST 60TH AVENUE DENVER, CO 80216	Landfill/Disposal Surface Impoundment
<u>NAPHTHALENE</u> (TRI Chemical ID: 000091203)	1989	Pounds	1300	USPCI-GRASSY MTN. FACILITY 3 MI. EAST & 7 MI. NORTH OF EX, IT 41/(OFF I-80) CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
<u>NAPHTHALENE</u> (TRI Chemical ID: 000091203)	1988	Pounds	98	CSI 2095 WEST 60TH AVE. DENVER, CO 80216	Landfill/Disposal Surface Impoundment
<u>NAPHTHALENE</u> (TRI Chemical ID: 000091203)	1988	Pounds	4800	UPSCI-GRASSY MTN. FACILITY 3 MI E. & 7 MI N. OF EXIT 41, (OFF I-80) CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
<u>NAPHTHALENE</u> (TRI Chemical ID: 000091203)	1987	Pounds	20	CSI 2095 WEST 60TH AVENUE DENVER, CO 802160000	Landfill/Disposal Surface Impoundment
<u>NAPHTHALENE</u> (TRI Chemical ID: 000091203)	1987	Pounds	1100	CONOCO, INC. 1000 SOUTH PINE PONCA CITY, OK 746030000	Land Treatment
<u>NITRATE COMPOUNDS</u> (TRI Chemical ID: N511)	2008	Pounds	30	CLEAN HARBORS ARAGONITE LLC 11600 NORTH APTUS ROAD GRANTSVILLE, UT 84029	Incineration/Thermal Treatment
<u>PHOSPHORIC ACID</u> (TRI Chemical ID: 007664382)	1997	Pounds	5	CONSERVATION SERVICES INC. 41800 E. 99TH AVE. BENNETT, CO 80102	Landfill/Disposal Surface Impoundment
<u>PHOSPHORIC ACID</u> (TRI Chemical ID: 007664382)	1991	Pounds	5000	ROYSTER AGRICULTURAL PRODUCTS FOOT OF OHIO ST. CHESAPEAKE, VA 23324	Other Reuse or Recovery
<u>PHOSPHORIC ACID</u> (TRI Chemical ID: 007664382)	1990	Pounds	2300	USPCI-GRASSY MOUNTAIN FACILITY 3 MI EAST & 7 MI NORTH OF EXIT, 41 OFF 180 CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
<u>PHOSPHORIC ACID</u> (TRI Chemical ID: 007664382)	1989	Pounds	6000	USPCI-GRASSY MTN. FACILITY 3 MI. EAST & 7 MI. NORTH OF EX, IT 41/(OFF I-80) CLIVE, UT 84029	Landfill/Disposal Surface Impoundment

Chemical Name (TRI Chemical ID)	Year	Quantity	Unit	Facility Name Address City, State ZIP	Treatment, Storage, and Disposal Method
<u>PHOSPHORIC ACID</u> (TRI Chemical ID: 007664382)	1988	Pounds	5700	USPCI-GRASSY MTN. FACILITY 3 MI E. & 7 MI N. OF EXIT 41, (OFF I-80) CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	2008	Pounds	44	CLEAN HARBORS ARAGONITE LLC 11600 NORTH APTUS ROAD GRANTSVILLE, UT 84029	Incineration/Thermal Treatment
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	2008	Pounds	26.57	RINECO 1007 VULCAN ROAD BENTON, AR 72015	Energy Recovery
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	2003	Pounds	.12	CLEAN HARBORS ENV SERVICES HIGHWAY 71 5 MILES S OF KIMBALL KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	2002	Pounds	.33	SYSTECH ENV CORPORATION P. O. BOX 111 SOUTH CEMENT ROAD FREDONIA, KS 66736	Energy Recovery
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	2001	Pounds	16	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CA 80013	Landfill/Disposal Surface Impoundment
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	2000	Pounds	38	CLEAN HARBORS ENVIRONMENTAL SERVICES, INC. 5 MILES SOUTH OF KIMBALL ON HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	2000	Pounds	27	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Landfill/Disposal Surface Impoundment
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	1998	Pounds	1167	CONSERVATION SERVICES 41800 E. 99TH AVENUE BENNETT, CO 80102	Landfill/Disposal Surface Impoundment
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	1997	Pounds	1478	CONSERVATION SERVICES INC. 41800 E. 99TH AVE. BENNETT, CO 80102	Landfill/Disposal Surface Impoundment
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	1996	Pounds	1825	DENVER ARAPAHOE DISPOSAL SITE 3500 S. GUN CLUB RD. AURORA, CO 80013	Landfill/Disposal Surface Impoundment
<u>POLYCYCLIC AROMATIC COMPOUNDS</u> (TRI Chemical ID: N590)	1995	Pounds	750	CONSERVATION SERVICES INC. 41800 E. 99TH AVE. BENNETT, CO 80102	Landfill/Disposal Surface Impoundment
<u>STYRENE</u> (TRI Chemical ID: 000100425)	1987	Pounds	250	USPCI-GRASSY MTN. FACILITY 3 MI EAST & 7 MI NORTH OF EXIT, 41 OFF I-80 CLIVE, UT 840290000	Landfill/Disposal Surface Impoundment
<u>STYRENE</u> (TRI Chemical ID: 000100425)	1987	Pounds	250	CONOCO, INC. 1000 SOUTH PINE PONCA CITY, OK 746030000	Land Treatment
<u>STYRENE</u> (TRI Chemical ID: 000100425)	1987	Pounds	250	CSI 2095 WEST 60TH AVENUE DENVER, CO 802160000	Landfill/Disposal Surface Impoundment
<u>TOLUENE</u> (TRI Chemical ID: 000108883)	2010	Pounds	38	CLEAN HARBORS ENVIRONMENTAL SERVICES 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
<u>TOLUENE</u>				RINECO CHEMICAL 1007 VULCAN ROAD	

TOLUENE (TRI Chemical ID: 000108883)	2010	Pounds	8	1007 VULCAN ROAD BENTON, AR 720158982	Energy Recovery
TOLUENE (TRI Chemical ID: 000108883)	2009	Pounds	90.9	CLEAN HARBORS ENVIRONMENTAL SERVICES 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
TOLUENE (TRI Chemical ID: 000108883)	2008	Pounds	5	RINECO 1007 VULCAN ROAD BENTON, AR 72015	Incineration/Insignificant Fuel Value
TOLUENE (TRI Chemical ID: 000108883)	2008	Pounds	87.8	SYSTECH ENVIRONMENTAL 1420 S. CEMENT ROAD FREDONIA, KS 66736	Energy Recovery
TOLUENE (TRI Chemical ID: 000108883)	2008	Pounds	354.5	CLEAN HARBORS ENVIRONMENTAL SV 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Thermal Treatment
TOLUENE (TRI Chemical ID: 000108883)	2008	Pounds	1.6	CLEAN HARBORS ARAGONITE LLC 11600 NORTH APTUS ROAD GRANTSVILLE, UT 84029	Incineration/Thermal Treatment
TOLUENE (TRI Chemical ID: 000108883)	2008	Pounds	5	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80018	Other Landfills
TOLUENE (TRI Chemical ID: 000108883)	2008	Pounds	80.1	CLEAN HARBORS DEER TRAIL LLC 109556 EAST HIGHWAY 36 DEER TRAIL, CO 80105	Solidification/Stabilization
TOLUENE (TRI Chemical ID: 000108883)	2007	Pounds	5	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Other Landfills
TOLUENE (TRI Chemical ID: 000108883)	2007	Pounds	5	RINECO 1007 VULCAN ROAD BENTON, AR 72015	Incineration/Insignificant Fuel Value
TOLUENE (TRI Chemical ID: 000108883)	2006	Pounds	5	RINECO 1007 VULCAN ROAD BENTON, AR 72015	Energy Recovery
TOLUENE (TRI Chemical ID: 000108883)	2006	Pounds	2.7	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Other Landfills
TOLUENE (TRI Chemical ID: 000108883)	2005	Pounds	2.7	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Other Landfills
TOLUENE (TRI Chemical ID: 000108883)	2004	Pounds	5	CONSERVATION SERVICES INC. 41800 E. 99TH AVENUE BENNETT, CO 80102	Other Landfills
TOLUENE (TRI Chemical ID: 000108883)	2004	Pounds	5	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Other Landfills
TOLUENE (TRI Chemical ID: 000108883)	2003	Pounds	1.8	CLEAN HARBORS ENV SERVICES HIGHWAY 71 5 MILES S OF KIMBALL KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
TOLUENE (TRI Chemical ID: 000108883)	2002	Pounds	19.97	CHEMICAL WASTE MANAGEMENT 7170 JOHN BRANNON RD. SULPHUR, LA 70665	Energy Recovery
				CLEAN HARBORS ENV SERVICES	

TOLUENE (TRI Chemical ID: 000108883)	2002	Pounds	5	HIGHWAY 71 5 MILES S OF KIMBALL KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
TOLUENE (TRI Chemical ID: 000108883)	2000	Pounds	5	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Landfill/Disposal Surface Impoundment
TOLUENE (TRI Chemical ID: 000108883)	1998	Pounds	108	SABINE RIVER WORKS REGIONAL INCINERATOR FM 1006 ORANGE, TX 77630	Incineration/Thermal Treatment
TOLUENE (TRI Chemical ID: 000108883)	1998	Pounds	92	CLEAN HARBORS HIGHWAY 71, 5 MI SO OF KIMBALL KIMBALL, NE 69145	Incineration/Thermal Treatment
TOLUENE (TRI Chemical ID: 000108883)	1997	Pounds	340	CLEAN HARBORS HWY. 71, 5 MI S OF KIMBALL KIMBALL, NE 69145	Incineration/Thermal Treatment
TOLUENE (TRI Chemical ID: 000108883)	1996	Pounds	32	CLEAN HARBOR HWY. 71-5 MILES OF KIMBALL KIMBALL, NE 69145	Incineration/Thermal Treatment
TOLUENE (TRI Chemical ID: 000108883)	1995	Pounds	1	DENVER ARAPAHOE DISPOSAL SITE 3500 S. GUN CLUB RD. AURORA, CO 80013	Landfill/Disposal Surface Impoundment
TOLUENE (TRI Chemical ID: 000108883)	1995	Pounds	7	CONSERVATION SERVICES INC. 41800 E. 88TH AVE. BENNETT, CO 80102	Landfill/Disposal Surface Impoundment
TOLUENE (TRI Chemical ID: 000108883)	1995	Pounds	580	CHIEF SUPPLY CORP. RTE. 2, BOX 71 HASKELL, OK 74436	Incineration/Thermal Treatment
TOLUENE (TRI Chemical ID: 000108883)	1994	Pounds	17	SAFETY-KLEEN CORP. COLORADO 2801 SOUTH TEJON ENGLEWOOD, CO 80110	Solvents/Organics Recovery
TOLUENE (TRI Chemical ID: 000108883)	1994	Pounds	30	SAFETY-KLEEN CORP. TEXAS 1722 COOPER CREEK RD. DENTON, TX 76201	Solvents/Organics Recovery
TOLUENE (TRI Chemical ID: 000108883)	1994	Pounds	8	CONSERVATION SERVICES INC. 2090 EAST 104TH ST. DENVER, CO 80233	Landfill/Disposal Surface Impoundment
TOLUENE (TRI Chemical ID: 000108883)	1994	Pounds	180	CHIEF SUPPLY CORP. RTE. 2 BOX 71 HASKELL, OK 74436	Energy Recovery
TOLUENE (TRI Chemical ID: 000108883)	1993	Pounds	16	CONTINENTAL CEMENT CO. HWY. 79 SOUTH HANNIBAL, MO 63401	Energy Recovery
TOLUENE (TRI Chemical ID: 000108883)	1993	Pounds	1	ROLLINS ENVIRONMENTAL SERVICES 13351 SCIENIC HWY. BATON ROUGE, LA 70809	Incineration/Thermal Treatment
TOLUENE (TRI Chemical ID: 000108883)	1993	Pounds	2	CONSERVATION SERVICES INC. 2090 EAST 104TH AVE. DENVER, CO 80223	Landfill/Disposal Surface Impoundment
TOLUENE (TRI Chemical ID: 000108883)	1993	Pounds	110	SAFETY-KLEEN CORP.-TEXAS 1722 COOPER CREEK RD. DENTON, TX 76201	Solvents/Organics Recovery

TOLUENE (TRI Chemical ID: 000108883)	1993	Pounds	26	SAFETY-KLEEN CORP.-COLORADO 2801 SOUTH TEJON ENGLEWOOD, CO 80110	Solvents/Organics Recovery
TOLUENE (TRI Chemical ID: 000108883)	1993	Pounds	4	ENVIROSAFE SERVICES OF IDAHO 10.5 MI NW OF GRANDVIEW, (MISSI LE BASE ROAD) GRANDVIEW, ID 83705	Landfill/Disposal Surface Impoundment
TOLUENE (TRI Chemical ID: 000108883)	1992	Pounds	120	SAFETY-KLEEN CORP. -TEXAS 1722 COOPER CREEK RD. DENTON, TX 76201	Solvents/Organics Recovery
TOLUENE (TRI Chemical ID: 000108883)	1992	Pounds	3	SAFETY-KLEEN CORP. - ILLINOIS 633 E. 138TH ST. DOLTON, IL 60419	Solvents/Organics Recovery
TOLUENE (TRI Chemical ID: 000108883)	1992	Pounds	480	CONTINENTAL CEMENT CO. HWY. 79 S. HANNIBAL, MO 63401	Energy Recovery
TOLUENE (TRI Chemical ID: 000108883)	1992	Pounds	25	SAFETY-KLEEN COPR - COLORADO 2801 S. TEJON ENGLEWOOD, CO 80110	Solvents/Organics Recovery
TOLUENE (TRI Chemical ID: 000108883)	1992	Pounds	2	ASH GROVE CEMENT CO. N. SANTA FE ST. CHANUTE, KS 66720	Energy Recovery
TOLUENE (TRI Chemical ID: 000108883)	1991	Pounds	360	ASH GROVE CEMENT CO. N. SANTA FE ST. CHANUTE, KS 66720	Energy Recovery
TOLUENE (TRI Chemical ID: 000108883)	1991	Pounds	120	SAFETY-KLEEN CORP. 2801 S. TEJON ENGLEWOOD, CO 80110	Solvents/Organics Recovery
TOLUENE (TRI Chemical ID: 000108883)	1991	Pounds	2200	ENVIROSAFE SERVICES OF IDAHO 10 1/2 MILES NW OF GRANDVIEW, (MISSILE BASE ROAD) GRANDVIEW, ID 83705	Landfill/Disposal Surface Impoundment
TOLUENE (TRI Chemical ID: 000108883)	1991	Pounds	140	ENSCO INC. AMERICAN OIL RD. EL DORADO, AR 71730	Incineration/Insignificant Fuel Value
TOLUENE (TRI Chemical ID: 000108883)	1991	Pounds	190	SAFETY-KLEEN CORP. 633 E. 138TH ST. DOLTON, IL 60419	Other Reuse or Recovery
TOLUENE (TRI Chemical ID: 000108883)	1991	Pounds	45	OIL & SOLVENT PROCESS CO. 9131 E. 96TH AVE. HENDERSON, CO 80640	Other Reuse or Recovery
TOLUENE (TRI Chemical ID: 000108883)	1991	Pounds	80	SAFETY-KLEEN CORP. STATE HWY. 146 NEW CASTLE, KY 40050	Solvents/Organics Recovery
TOLUENE (TRI Chemical ID: 000108883)	1990	Pounds	780	USPCI-GRASSY MOUNTAIN FACILITY 3 MI EAST & 7 MI NORTH OF EXIT, 41 OFF 180 CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
TOLUENE (TRI Chemical ID: 000108883)	1989	Pounds	470	USPCI-GRASSY MTN. FACILITY 3 MI. EAST & 7 MI. NORTH OF EX, IT 41/(OFF I-80) CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
TOLUENE (TRI Chemical ID: 000108883)	1989	Pounds	130	CSI 2095 WEST 60TH AVENUE DENVER, CO 80216	Landfill/Disposal Surface Impoundment

TOLUENE (TRI Chemical ID: 000108883)	1988	Pounds	24	CSI 2095 WEST 60TH AVE. DENVER, CO 80216	Landfill/Disposal Surface Impoundment
TOLUENE (TRI Chemical ID: 000108883)	1988	Pounds	1700	USPCI-GRASSY MTN. FACILITY 3 MI E. & 7 MI N. OF EXIT 41, (OFF I-80) CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
TOLUENE (TRI Chemical ID: 000108883)	1987	Pounds	410	CONOCO, INC. 1000 SOUTH PINE PONCA CITY, OK 746030000	Land Treatment
TOLUENE (TRI Chemical ID: 000108883)	1987	Pounds	80	CSI 2095 WEST 60TH AVENUE DENVER, CO 802160000	Landfill/Disposal Surface Impoundment
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	2010	Pounds	11	RINECO CHEMICAL 1007 VULCAN ROAD BENTON, AR 720158982	Energy Recovery
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	2010	Pounds	59	CLEAN HARBORS ENVIRONMENTAL SERVICES 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	2009	Pounds	142	CLEAN HARBORS ENVIRONMENTAL SERVICES 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	2008	Pounds	5	RINECO 1007 VULCAN ROAD BENTON, AR 72015	Incineration/Insignificant Fuel Value
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	2008	Pounds	125.7	SYSTECH ENVIRONMENTAL 1420 S. CEMENT ROAD FREDONIA, KS 66736	Energy Recovery
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	2008	Pounds	74.6	CLEAN HARBORS ENVIRONMENTAL SV 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Thermal Treatment
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	2008	Pounds	250	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80018	Other Landfills
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	2008	Pounds	9.7	CLEAN HARBORS ARAGONITE LLC 11600 NORTH APTUS ROAD GRANTSVILLE, UT 84029	Incineration/Thermal Treatment
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	2008	Pounds	205.2	CLEAN HARBORS DEER TRAIL LLC 109556 EAST HIGHWAY 36 DEER TRAIL, CO 80105	Solidification/Stabilization
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	2007	Pounds	5	RINECO 1007 VULCAN ROAD BENTON, AR 72015	Incineration/Insignificant Fuel Value
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	2007	Pounds	250	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Other Landfills
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	2007	Pounds	5	CLEAN HARBORS ENVIRONMENTAL SV 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	2006	Pounds	250	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Other Landfills

<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	2006	Pounds	5	RINECO 1007 VULCAN ROAD BENTON, AR 72015	Energy Recovery
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	2006	Pounds	5	CLEAN HARBORS ENVIRONMENTAL SV 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	2005	Pounds	.17	CLEAN HARBORS ENVIRONMENTAL SV 2247 SOUTH HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	2005	Pounds	35	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Other Landfills
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	2004	Pounds	5	CONSERVATION SERVICES INC. 41800 E. 99TH AVENUE BENNETT, CO 80102	Other Landfills
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	2004	Pounds	5	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Other Landfills
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	2003	Pounds	23.54	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Other Landfills
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	2002	Pounds	49.94	CHEMICAL WASTE MANAGEMENT 7170 JOHN BRANNON RD. SULPHUR, LA 70665	Energy Recovery
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	2002	Pounds	.515	CLEAN HARBORS ENV SERVICES HIGHWAY 71 5 MILES S OF KIMBALL KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	2001	Pounds	5	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CA 80013	Landfill/Disposal Surface Impoundment
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	2001	Pounds	5	CLEAN HARBORS ENV SERVICES 5 MILES SOUTH OF KIMBALL ON HIGHWAY 71 KIMBALL, NE 69145	Incineration/Insignificant Fuel Value
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	2000	Pounds	5	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Landfill/Disposal Surface Impoundment
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	1999	Pounds	5	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB ROAD AURORA, CO 80013	Landfill/Disposal Surface Impoundment
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	1998	Pounds	92	CLEAN HARBORS HIGHWAY 71, 5 MI SO OF KIMBALL KIMBALL, NE 69145	Incineration/Thermal Treatment
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	1998	Pounds	108	SABINE RIVER WORKS REGIONAL INCINERATOR FM 1006 ORANGE, TX 77630	Incineration/Thermal Treatment
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	1997	Pounds	340	CLEAN HARBORS HWY. 71, 5 MI S OF KIMBALL KIMBALL, NE 69145	Incineration/Thermal Treatment
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	1997	Pounds	3	DENVER ARAPAHOE DISPOSAL SITE 3500 SOUTH GUN CLUB RD. AURORA, CO 80013	Landfill/Disposal Surface Impoundment

(TRI Chemical ID: 001330207)				AURORA, CO 80013	
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1996	Pounds	23	CLEAN HARBOR HWY. 71-5 MILES OF KIMBALL KIMBALL, NE 69145	Incineration/Thermal Treatment
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1996	Pounds	2	DENVER ARAPAHOE DISPOSAL SITE 3500 GUN CLUB RD. AURORA, CO 80013	Landfill/Disposal Surface Impoundment
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1995	Pounds	580	CHIEF SUPPLY CORP. RTE. 2, BOX 71 HASKELL, OK 74436	Incineration/Thermal Treatment
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1994	Pounds	61	CHIEF SUPPLY CORP. RTE. 2 BOX 71 HASKELL, OK 74436	Energy Recovery
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1994	Pounds	7	SAFETY-KLEEN CORP.-TEXAS 1722 COOPER CREEK RD. DENTON, TX 76201	Solvents/Organics Recovery
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1994	Pounds	85	CONSERVATION SERVICES INC. 2090 EAST 104TH ST. DENVER, CO 80233	Landfill/Disposal Surface Impoundment
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1994	Pounds	35	SAFETY-KLEEN CORP.-COLORADO 2801 SOUTH TEJON ENGLEWOOD, CO 80110	Solvents/Organics Recovery
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1993	Pounds	16	CONTINENTAL CEMENT CO. HWY. 79 SOUTH HANNIBAL, MO 63401	Energy Recovery
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1993	Pounds	4	ENVIROSAFE SERVICES OF IDAHO 10.5 MI NW OF GRANDVIEW, (MISSI LE BASE ROAD) GRANDVIEW, ID 83705	Landfill/Disposal Surface Impoundment
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1993	Pounds	1	ROLLINS ENVIRONMENTAL SERVICES 13351 SCIENIC HWY. BATON ROUGE, LA 70809	Incineration/Thermal Treatment
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1993	Pounds	5	CONSERVATION SERVICES INC. 2090 EAST 104TH AVE. DENVER, CO 80233	Landfill/Disposal Surface Impoundment
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1993	Pounds	28	SAFETY-KLEEN CORP.-TEXAS 1722 COOPER CREEK RD. DENTON, TX 76201	Solvents/Organics Recovery
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1993	Pounds	52	SAFETY-KLEEN CORP.-COLORADO 2801 SOUTH TEJON ENGLEWOOD, CO 80110	Solvents/Organics Recovery
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1992	Pounds	360	CONTINENTAL CEMENT CO. HWY. 79 S. HANNIBAL, MO 63401	Energy Recovery
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1992	Pounds	2	ASH GROVE CEMENT CO. N. SANTA FE ST. CHANUTE, KS 66720	Energy Recovery
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1992	Pounds	49	SAFETY-KLEEN CORP. -COLORADO 2801 SOUTH TEJON ENGLEWOOD, CO 80110	Solvents/Organics Recovery
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)				SAFETY-KLEEN CORP. -ILLINOIS	

<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	1992	Pounds	1	633 E. 138TH ST. DOLTON, IL 60419	Solvents/Organics Recovery
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	1992	Pounds	1	ENVIORSAFE SERVICES OF IDAHO 10-1/2 MILE N.W. OF GRANDVIEW, MISSLE BASE RD. GRANDVIEW, ID 83705	Landfill/Disposal Surface Impoundment
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	1992	Pounds	31	SAFETY-KLEEN CORP. -TEXAS 1722 COOPER CREEK RD. DENTON, TX 76201	Solvents/Organics Recovery
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	1991	Pounds	48	SAFETY-KLEEN CORP. 633 E. 138TH ST. DOLTON, IL 60419	Other Reuse or Recovery
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	1991	Pounds	20	SAFETY-KLEEN CORP. STATE HWY. 146 NEW CASTLE, KY 40050	Solvents/Organics Recovery
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	1991	Pounds	29	SAFETY-KLEEN CORP. 2801 S. TEJON ENGLEWOOD, CO 80110	Solvents/Organics Recovery
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	1991	Pounds	130	ENVIORSAFE SERVICES OF IDAHO 10 1/2 MILES NW OF GRANDVIEW, (MISSILE BASE ROAD) GRANDVIEW, ID 83705	Landfill/Disposal Surface Impoundment
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	1991	Pounds	11	OIL & SOLVENT PROCESS CO. 9131 E. 96TH AVE. HENDERSON, CO 80640	Other Reuse or Recovery
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	1991	Pounds	19	ASH GROVE CEMENT CO. N. SANTA FE ST. CHANUTE, KS 66720	Energy Recovery
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	1991	Pounds	73	ENSCO INC. AMERICAN OIL RD. EL DORADO, AR 71730	Incineration/Insignificant Fuel Value
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	1990	Pounds	8600	USPCI-GRASSY MOUNTAIN FACILITY 3 MI EAST & 7 MI NORTH OF, EXIT 41 (OFF I-80) CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	1989	Pounds	130	CSI 2095 WEST 60TH AVENUE DENVER, CO 80216	Landfill/Disposal Surface Impoundment
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	1989	Pounds	19000	USPCI-GRASSY MTN. FACILITY 3 MI. EAST & 7 MI. NORTH OF EX, IT 41/(OFF I-80) CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	1988	Pounds	14000	USPCI-GRASSY MTN. FACILITY 3 MI E. & 7 MI N. OF EXIT 41, (OFF I-80) CLIVE, UT 84029	Landfill/Disposal Surface Impoundment
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	1988	Pounds	24	CSI 2095 WEST 60TH AVE. DENVER, CO 80216	Landfill/Disposal Surface Impoundment
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	1987	Pounds	50	CSI 2095 WEST 60TH AVENUE DENVER, CO 80216	Landfill/Disposal Surface Impoundment
<u>XYLENE (MIXED ISOMERS)</u> (TRI Chemical ID: 001330207)	1987	Pounds	28000	CONOCO, INC. 1000 SOUTH PINE PONCA CITY, OK 746030000	Land Treatment

Summary of Waste Management Activities

Please note that chemical amounts shown here are not included in Total Aggregate Releases shown above.

**Summary of Waste Management Activities excluding Dioxin and Dioxin-like Compounds
(Measured in Pounds)**

Year	On-Site Recycling	Off-Site Recycling	On-Site Energy Recovery	Off-Site Energy Recovery	On-Site Treatment	Off-Site Treatment	Total Amount
2009	0	0	0	0	82115	321.6	82436.6
2010	0	0	0	19	60863	134	61016
2011 (Projected)	0	0	0	20	67800	199	68019
2012 (Projected)	0	0	0	20	67800	199	68019

**Summary of Waste Management Activities for Dioxin and Dioxin-like Compounds
(Measured in Grams)**

This facility did not report any waste management activities for Dioxin and Dioxin-like Compounds.

Chemicals Under Waste Management:

Please note that chemical amounts shown here are not included in the Total Aggregate Releases shown above. Transfers to Publicly Owned Treatment Works are listed on a separate table.

Chemical Name	Year	Unit Of Measure	On-Site Recycling	Off-Site Recycling	On-Site Energy Recovery	Off-Site Energy Recovery	On-Site Treated	Off-Site Treated	Total Amount
1,2,4-TRIMETHYLBENZENE	2009	Pounds	0	0	0	0	2710	9.7	2719.7
	2010	Pounds	0	0	0	0	2569	4.1	2573.1
	2011 (Projected)	Pounds	0	0	0	0	2600	9	2609
	2012 (Projected)	Pounds	0	0	0	0	2600	9	2609
AMMONIA	2009	Pounds	0	0	0	0	52421	0	52421
	2010	Pounds	0	0	0	0	32711	0	32711
	2011 (Projected)	Pounds	0	0	0	0	40000	0	40000
	2012 (Projected)	Pounds	0	0	0	0	40000	0	40000
BENZENE	2009	Pounds	0	0	0	0	8644	36.7	8680.7
	2010	Pounds	0	0	0	0	8195	15.3	8210.3
	2011 (Projected)	Pounds	0	0	0	0	8000	20	8020
	2012 (Projected)	Pounds	0	0	0	0	8000	20	8020
CUMENE	2009	Pounds	0	0	0	0	2385	0	2385
	2010	Pounds	0	0	0	0	2261	0	2261
	2011 (Projected)	Pounds	0	0	0	0	2200	0	2200
	2012 (Projected)	Pounds	0	0	0	0	2200	0	2200
CYCLOHEXANE	2009	Pounds	0	0	0	0	1192	0	1192
	2010	Pounds	0	0	0	0	1131	0	1131
	2011 (Projected)	Pounds	0	0	0	0	1100	0	1100
	2012 (Projected)	Pounds	0	0	0	0	1100	0	1100
ETHYLBENZENE	2009	Pounds	0	0	0	0	2325	25.3	2350.3
	2010	Pounds	0	0	0	0	2204	10.6	2214.6
	2011 (Projected)	Pounds	0	0	0	0	2200	10	2210
	2012 (Projected)	Pounds	0	0	0	0	2200	10	2210
NAPHTHALENE	2009	Pounds	0	0	0	0	745	17	762
	2010	Pounds	0	0	0	0	706	7	713
	2011 (Projected)	Pounds	0	0	0	0	700	10	710
	2012 (Projected)	Pounds	0	0	0	0	700	10	710
TOLUENE	2009	Pounds	0	0	0	0	5813	90.9	5903.9
	2010	Pounds	0	0	0	8	5511	38	5557

	2011 (Projected)	Pounds	0	0	0	10	5500	50	5560
	2012 (Projected)	Pounds	0	0	0	10	5500	50	5560
<u>XYLENE (MIXED ISOMERS)</u>	2009	Pounds	0	0	0	0	5880	142	6022
	2010	Pounds	0	0	0	11	5575	59	5645
	2011 (Projected)	Pounds	0	0	0	10	5500	100	5610
	2012 (Projected)	Pounds	0	0	0	10	5500	100	5610

Transfer of Chemicals to Publicly Owned Treatment Works (POTW):

This facility did not transfer any chemicals to a Publicly Owned Treatment Works (POTW).

Non Production Releases:

This report shows the quantities of the chemicals released to the environment by reporting year as a result of remedial actions, catastrophic events, or other one-time events not associated with production processes. Chemicals with zero release amounts are not shown.

Chemical Name	Reporting Year	Unit Of Measure	Release Quantity
<u>1,2,4-TRIMETHYLBENZENE</u>	1995	Pounds	1
<u>1,2,4-TRIMETHYLBENZENE</u>	1994	Pounds	2
<u>BENZENE</u>	1995	Pounds	21
<u>BENZENE</u>	1994	Pounds	5
<u>CUMENE</u>	1995	Pounds	14
<u>CUMENE</u>	1994	Pounds	4
<u>CYCLOHEXANE</u>	1994	Pounds	2
<u>ETHYLBENZENE</u>	1995	Pounds	25
<u>ETHYLBENZENE</u>	1994	Pounds	5
<u>N-HEXANE</u>	1995	Pounds	31
<u>NAPHTHALENE</u>	1995	Pounds	2
<u>TOLUENE</u>	1995	Pounds	110
<u>TOLUENE</u>	1994	Pounds	19
<u>XYLENE (MIXED ISOMERS)</u>	1995	Pounds	143
<u>XYLENE (MIXED ISOMERS)</u>	1994	Pounds	26

Additional links for TRI:

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National Library of Medicine (NLM) [EXIT ↗](#) [TOXMAP](#)

The Environmental Defense Fund's (EDF) Chemical Scorecard has on-line environmental information regarding this [EXIT ↗](#) facility's reported TRI releases.

Exhibit 3

Finley, B., "Health department: Pipe may have broken a half mile from Sand Creek spill site,"
Denver Post (Nov. 30, 2011)

denverpost.com

THE DENVER POST

Health department: Pipe may have broken a half mile from Sand Creek spill site

Posted: 11/30/2011 11:02:32 AM MST
Updated: 11/30/2011 06:28:08 PM MST **By Bruce
Finley**
The Denver Post

Posted: 11/30/2011 11:02:32 AM MST
Updated: 11/30/2011 06:28:08 PM MST



Workers contracted by Suncor are using vacuum trucks and absorbent material to suck up water mixed with an unidentified liquid leaking into Sand Creek north of downtown Denver, Wednesday, Nov. 30, 2011. (Craig F. Walker, The Denver Post)

U.S. Environmental Protection Agency engineers say they think they understand where black goo leaking into Sand Creek north of downtown Denver is coming from, but they haven't stopped the flow.

"The material appears to be coming from Suncor property, migrating under the Metro Wastewater property and daylighting in Sand Creek," said EPA emergency response

manager Curtis Kimbel.

State health department managers today told the Associated Press that Suncor Energy reported a break in a spur of an underground pipe that runs between a storage tank and refinery about a half mile from where the oily ooze is leaking into the creek.

Hazardous Waste Corrective Action Unit supervisor Walter Avramenko said more tests are needed

to confirm the break is the source.

Workers contracted by Suncor are still using vacuum trucks to suck up water fouled with the black liquid. They also are using absorbent material to keep more of the the still unidentified liquid from reaching the South Platte River.

"Our goal still is to completely stop it from going into the creek," Kimbel said.

At 3 p.m., workers will begin digging a trench to try to stanch the flow of the material,



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which was first reported leaking into Sand Creek and the South Platte by a fisherman Sunday morning.

Federal environmental officials have been managing the spill since Monday afternoon.

Workers overnight dammed off a catchment area and banded it with absorbent material hoping slow the spread into the river.

The EPA also has launched comprehensive water and soil sampling along Sand Creek and the South Platte. The first lab results from earlier tests are expected this afternoon, and EPA contractor said.

First responders are still using vapor monitors that indicate an ongoing need for respirators.

The area is part of the Sand Creek Regional Greenway, billed as "wilderness in the city."

Colorado Department of Public Health and



Workers try to stop and mop up the substance leaking into the water. (THE DENVER POST | Bruce Finley)

Environment officials have known about hazardous leakages in the area for at least a

month, documents show. And for a week, toxic vapors at the nearby Metro Wastewater Reclamation District facility have forced workers to wear respirators.

But nobody checked the rivers or tried to stop the seepage. Damage remains unassessed.

Lab tests of water and soil samples taken late Monday and early Tuesday have not been completed, and the source remained a mystery in an industrial area where refineries have existed since 1938. Kimbel today said there is a long history of problems at the site.

"We might be able to find people who have some historical knowledge of those" problems, he said.

At the adjacent Metro Wastewater plant, operations director Steve Rogowski said petroleum odors worsened significantly over the past week, forcing a partial closure of a technical-services building.



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"There have been levels of benzene, there have been levels of VOCs (volatile organic compounds)," he said. "And so, as a precaution, we provided respirators."

Fisherman found spill

A fisherman wading in the river Sunday morning detected the spill and tried to notify authorities, scratching out phone numbers on the sand until he finally reached a state response coordinator who asked if he could call him back in 20 minutes.

"I said, 'No! Is this how Colorado responds to oil spills?' He said, 'You are right' and took down the info," said angler Trevor Tanner, 37, an aerospace engineer. "What I pictured was, when I make a call that there was an oil spill, people come in with sirens blazing."

Reports of spills often are referred to local agencies. After receiving the report from the state health department, Tri-County Health Department investigators tried to locate the spill but could not.

Meanwhile, Tanner wrote about what had happened on his fishing blog, and a reader in Boise, Idaho, later called The Denver Post.

EPA duty officer Craig Myers dispatched Kimbel shortly before noon Monday.

Kimbel stood on a bike-path overpass and looked down at the South Platte. He could not see the sheen but smelled the odor. He then hiked along Sand Creek from the confluence with the South Platte to where the black goo was thickest — about a mile northwest of the refinery and launched an EPA response.

Suncor officials later reported a spill.

The state health department was well aware of problems at the site.

An Oct. 26 letter from the health department to Suncor's senior remediation officer said "recent releases of hazardous waste and hazardous constituents onsite are now migrating offsite in excess of applicable standards."

Tuesday evening, EPA and Suncor officials met at the refinery and decided to try digging the trench. Health department officials did not attend because agency experts were needed to respond to media calls, health department spokesman Warren Smith said.

It is unclear how long the oily material has been leaking into the creek and South Platte.

Health department officials doubt the muck has been leaking into the creek for as long as a month, Avramenko said.

"Somebody would have noticed it," Avramenko said. "My guess is what we are



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talking about at the present moment is something that happened only recently."

Health risks unknown

He said health department officials "only learned of the vapor-intrusion issue at the Metro Wastewater facility" on Monday.

Potential public-health risks have not been assessed. Lab test results "will help us evaluate what risk may exist, if any," Avramenko said.

A Colorado Division of Parks and Wildlife employee checked out Sand Creek on Tuesday morning and did not notice dead fish, suggesting less than acute toxicity in the water.

State health officials said they notified downriver municipal and agricultural water providers about the spill. At least one agency shut off its intake from the South Platte and was drawing water instead from Standley Lake on the west side of the metro area.

Suncor has been monitoring contaminated groundwater under the refinery site it inherited from Conoco, including a hydrocarbon plume that has spread onto adjacent property owned by Metro Wastewater.

But "we really don't have a sense of where this material is coming from," Suncor vice president for refining John Gallagher said. "It is coming out of the ground. It is not coming out in a rapid manner. But it is coming out."

Suncor's water testing focuses on water running off its property, and company

employees "do not monitor water that is downstream of our location," Gallagher said.

The health department and other state agencies also did not test river water this past month.

Tanner said he will discuss this incident with Trout Unlimited, the fisheries conservation advocacy group.

"I could see the currents in the water. They kind of glowed funny. I noticed the gas smell but kind of brushed it off as being Commerce City. But I really started to smell it once I got across the Platte. I could see a weird brown sludge at the confluence — a light white film across the top.

"I did put my hand in it. Hopefully it is not heavily carcinogenic," he said. "You could smell it on my flies. I really love the river. I love the fish. So this is quite distressing."

Bruce Finley: 303-954-1700

or bfinley@denverpost.com

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December 2, 2011

**BY CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Rick George
Chief Executive Officer
Suncor Energy, Inc.
PO Box 2844
150 – 6 Avenue S.W.
Calgary, Alberta
Canada T2P 3E3

John Gallagher
Vice President Refining
Suncor Energy USA, Inc.
717 17th St., Suite 2900
Denver, CO 80202

Jay Christopher
Environmental Manager
Suncor Energy USA, Inc.
Commerce City Refinery
5801 Brighton Blvd.
Commerce City, CO 80022

**Re: Notice of Intent to File Suit Under the Clean Water Act and Clean Air Act, Oil Spill
from Suncor Denver Refinery**

Dear Messrs. George, Gallagher, and Christopher:

Pursuant to the citizen suit provision of the Clean Water Act, 33 U.S.C. § 1365(a)(1), and the Clean Air Act, 42 U.S.C. § 7604(a)(1), WildEarth Guardians hereby provides you notice that we intend to file suit against Suncor Energy, Inc. and Suncor Energy USA, Inc. (hereafter we refer to both entities as “Suncor”) over ongoing violations of the Clean Water Act and Clean Air Act at the company’s Commerce City Oil Refinery located in Adams County, Colorado related to an ongoing oil spill into Sand Creek, a tributary of the South Platte River.

In accordance with the Clean Water Act, 33 U.S.C. § 1365(b)(1), and the Clean Air Act, 42 U.S.C. § 7604(b)(1)(A), in sixty days, or shortly thereafter, we intend to file suit against

Suncor and seek appropriate injunctive relief, declaratory relief, and other relief that may be provided as necessary to remedy these ongoing violations under the Clean Water Act and Clean Air Act.

Pursuant to 40 C.F.R. §§ 53.2 and 135.2(c), this notice is being served via certified mail to the owner or managing agent the building, plant, installation, or facility in violation, with copies concurrently sent to the registered agent of Suncor USA, Inc., the Administrator of the U.S. Environmental Protection Agency (“EPA”), the Region 8 Administrator of the EPA, the Director of the Colorado Water Quality Control Division, the Director of the Colorado Air Pollution Control Division, and the Colorado Governor.

I. The Source

The Commerce City Oil Refinery is located at 5800 Brighton Boulevard in Commerce City, Colorado. According to Suncor, the refinery processes 93,000 barrels per day of oil, producing gasoline, distillates, and paving grade asphalt. The refinery releases air pollution into the airshed of the Denver metropolitan area and discharges water pollution into Sand Creek, a tributary to the South Platte River.

The refinery has a sordid environmental compliance history. According to the Environmental Protection Agency’s (“EPA’s”) Environment and Compliance History Online (“ECHO”) database, the refinery has been in violation of clean air laws at least for the last three years. *See* Exhibit 1, EPA, Suncor Energy Commerce City Refinery Detailed Facility Report, available at <http://www.epa-echo.gov/cgi-bin/get1cReport.cgi?tool=echo&IDNumber=110015848813> (last accessed Dec. 1, 2011). Ongoing violations are still “unaddressed.” The facility is a High Priority Violator according to the EPA. The facility has violated clean water laws on numerous occasions over the years. According to the ECHO database, the facility violated clean water laws between January and March of 2009 and July 2010 and March 2011.

The refinery releases nearly 70,000 pounds of toxic substances in the form of air pollution, water pollution, and waste disposal. These releases include 23,919 pounds of hexane into the air, 16,870 pounds of nitrates into the water, and 29 pounds of lead. *See* Exhibit 2, EPA, Toxic Release Inventory Data for Suncor Energy Commerce City Refinery, available at http://oaspub.epa.gov/enviro/tris_control.tris_print?tris_id=80022CNCDN5801B (last accessed Dec. 1, 2011).

On or around November 28, 2011, Suncor reported a discharge into Sand Creek that emanated from its Commerce City Refinery property. *See* Exhibit 3, Finley, B., “Health department: Pipe may have broken a half mile from Sand Creek spill site,” *Denver Post* (Nov. 30, 2011). The discharge was reported to have resulted from a plume migrating from Suncor’s refinery, under property owned by Metro Wastewater, and into Sand Creek and ultimately the South Platte River. News reports indicate the discharge consists of hazardous substances, such as volatile organic compounds (“VOCs”), including benzene, which have also been released into the air and produced foul odors. Regulators have stated that a broken underground pipe that runs between a storage tank and the refinery on Suncor’s property is the most likely source of the

discharge. Although the discharge was reported on or around November 28, 2011, regulators have indicated that the break in the pipe “happened quite some time ago.” See Exhibit 4, Finley, B., “Black gunk leaking into Sand Creek and South Platte contains cancer-causing benzene, EPA tests show,” *Denver Post* (Dec. 1, 2011).

The discharge has prompted a major clean up effort of Sand Creek and the South Platte River, but latest reports indicate the discharge has not ceased. Reports also indicate that air pollution associated with the spill has not been controlled.

II. The Violations

Suncor’s recent discharges from its Commerce City Refinery into Sand Creek violate a number of state and federal Clean Water Act and Clean Air Act provisions that are enforceable by citizens. We hereby provide notice that Suncor is specifically violating the following requirements as explained below:

- Failure to obtain National Pollutant Discharge Elimination System (“NPDES”) permit, Violation of federal Clean Water Act and implementing regulations: The Clean Water Act and its implementing regulations applicable to state permitting program state that it is unlawful to discharge pollutants from a point source to navigable waters without obtaining and complying with a permit governing the quantity and quality of discharge. The Clean Water Act specifically prohibits “the discharge of any pollutants by any person...” except in compliance with, among other sections of the Clean Water Act, the National Pollutant Discharge Elimination System permitting requirements set forth under Section 1342 of the Act. 33 U.S.C. § 1311(a). The duty to apply for an NPDES permit extends to “[a]ny person who discharges or proposes to discharge pollutants...” 40 C.F.R. § 122.21(a).

The term “discharge of pollutants” means “any addition of any pollutant to navigable waters from any point source.” 33 U.S.C. § 1362(12). Pollutants are defined to include, among other things, “solid waste,” “garbage,” “chemical wastes,” and “industrial...waste.” 33 U.S.C. § 1362(6). A point source is defined as “any discernable, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel [or] conduit...from which pollutants are or may be discharged.” 33 U.S.C. § 1362(14). “Navigable waters” means “the waters of the United States.” 33 U.S.C. § 1362(7).

Here, the ongoing release of hazardous materials, whether from a pipe or other discrete conveyance, on the property of Suncor’s Commerce City Refinery into Sand Creek constitutes a discharge of pollutants from a point source into a navigable water. The hazardous materials are pollutants within the meaning of the Clean Water Act and given that they are being added to Sand Creek, they are being discharged. The pipe, or other discrete conveyance, in this case constitutes a point source. Furthermore, Sand Creek is a navigable water. Despite this, Suncor does not have an NPDES permit for this discharge and has not applied for such a permit, in violation of 33 U.S.C. § 1311(a) and 40 C.F.R. § 122.21(a).

- Failure to obtain Colorado Discharge Permit System permit, Violation of Colorado Water Quality Control Act and Water Quality Control Commission (“WQCC”) Regulations: The

State of Colorado has a permitting system similar to the federal Clean Water Act and indeed the EPA has approved Colorado's permitting system as consistent with the Clean Water Act in accordance with 40 C.F.R. § 123. Similar to the federal Clean Water Act, the Colorado Water Quality Control Act prohibits the "discharge [of] any pollutant into any state water from a point source without first having obtained a permit...for such discharge." C.R.S. 25-8-501(1). Accordingly, WQCC regulations also prohibit any person from discharging "any pollutant into any state water from a point source without first having obtained a permit from the [Water Quality Control] Division for such discharge[.] WQCC Regulation No. 61, Section 61.3(1)(a).

Similar to the Clean Water Act, the Colorado Water Quality Control Act defines "discharge of pollutants" as "the introduction or addition of a pollutant into state waters." C.R.S. 25-8-103(3). Pollutants are defined to include, among other things, "solid waste," "garbage," "chemical waste," and "industrial...waste." C.R.S. 25-8-103(15). A point source is defined as "any discernable, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel [or] conduit...from which pollutants are or may be discharged." C.R.S. 25-8-103(14). "State waters" means "any and all surface and subsurface waters which are contained in or flow in or through this state." C.R.S. 25-8-103(19).

Here, the ongoing release of hazardous materials from a pipe, or other discrete conveyance, on the property of Suncor's Commerce City Refinery into Sand Creek constitutes a discharge of pollutants from a point source into a state water. The hazardous materials are pollutants within the meaning of the Colorado Water Quality Control Act and given that they are being added to Sand Creek, they are being discharged. The pipe, or other discrete conveyance, in this case constitutes a point source. Furthermore, Sand Creek is a state water as it is located in Colorado. Despite this, Suncor does not have a Colorado Discharge Permit for this discharge and has not applied for such a permit, in violation of C.R.S. 25-8-501(1) and WQCC Regulation No. 61, Section 61.3(1)(a).

- Failure to control VOC emissions, Violation of Title V Permit: The federal Clean Air Act requires major stationary sources of air pollution to comply with an operating permit issued pursuant to Title V of the Act. *See* 42 U.S.C. § 7661a(1). The State of Colorado has been granted authority to issue operating permits pursuant to Title V of the Clean Air Act. Suncor obtained operating permits most recently from the Colorado Air Pollution Control Division for the eastern portion of its Commerce City Refinery in 2009 and the western portion of its Commerce City Refinery in 2006. *See* Air Pollution Control Division Operating Permits No. 95OPAD108 and No. 96OPAD120, available at <http://www.cdphe.state.co.us/ap/download/AD108p02.pdf> and <http://www.cdphe.state.co.us/ap/download/ad120p02.pdf>. Both operating permits state that "The permittee shall not dispose of volatile organic compounds by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized." Operating Permit No. 95OPAD108, Section IV, Condition 29(b) and Operating Permit No. 96OPAD120, Section IV, Condition 29(b). RACT is defined under Colorado Air Quality Control Commission ("AQCC") Common Provisions Regulation as, "Technology that will achieve the maximum degree of emission control that a particular source is capable of meeting and that is reasonably achievable considering technological and economic feasibility." AQCC Common

Provisions Regulation, Section I.G.

Here, Suncor has disposed of VOCs through evaporation without utilizing reasonably available control technology. The discharge of hazardous materials has reportedly led to VOC emissions, including benzene emissions, through evaporation. However, Suncor did not use reasonable controls that are technologically and economically feasible to limit emissions or otherwise achieve the maximum degree of emission control that the source is capable of meeting. Of particular concern is that it appears that Suncor has not turned off the flow to the leaking pipeline in order to prevent further disposal of VOCs through evaporation or otherwise taken other technologically and economically feasible steps to limit the release of VOC emissions, in violation of its Clean Air Act operating permits.

III. The Citizen Suit Provisions of the Clean Water Act and Clean Air Act

Under the Clean Water Act, any person may file suit in federal court against any other person “alleged to be in violation of...an effluent standard or limitation[.]” 33 U.S.C. § 1365(a)(1). The phrase “effluent standard or limitation” is broadly defined under the Clean Water Act and includes, but is not limited to, “an unlawful act under subsection (a) of section 1311 of this title[.]” 33 U.S.C. § 1365(f). Section 1311(a) prohibits the discharge of pollutant except in compliance with the NPDES provisions of Section 1342 of the Clean Water Act, as well as any EPA approved state NPDES permitting program, such as the Colorado Discharge Permit System. *See* 33 U.S.C. § 1342(b).

Under the Clean Air Act, any person may file suit in federal court against any other person alleged to “have violated (if there is evidence that the alleged violation has been repeated) or to be in violation of...an emission standard or limitation under this Act[.]” 42 U.S.C. § 7604(a)(1)(A). The phrase “emission standard or limitation” is broadly defined under the Clean Air Act and includes, but is not limited to, “any...standard, limitation, or schedule established under any permit issued pursuant to title V[.]” 42 U.S.C. § 7604(f)(4).

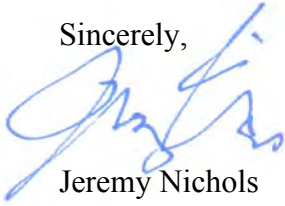
As explained above, on or around November 28, 2011, Suncor has been illegally discharging pollutants from its Commerce City Refinery and into Sand Creek without the required permit, in violation of the Clean Water Act, and related to this discharge, illegally disposing of VOCs through evaporation, in violation of the Clean Air Act. If these violations cannot be resolved within 60 days, WildEarth Guardians intends to file suit against Suncor to enforce the Clean Water Act and Clean Air Act. Pursuant to both the citizen suit provisions of the Clean Water Act and Clean Air Act, WildEarth Guardians intends to seek declaratory and injunctive relief, the assessment of civil penalties, recover costs and fees, and any other relief that may be appropriate.

IV. Conclusion

Further investigation is likely to reveal additional violations of the Clean Water Act and Clean Air Act related to the discharge of hazardous materials from the pipe, or other discrete conveyance, at the Commerce City Refinery. WildEarth Guardians hereby retains the right to enforce any and all additional violations uncovered after the date of this notice letter.

Contact information for WildEarth Guardians is listed below. If you have questions regarding these allegations, believe that any of the above information is in error, or would like to discuss a settlement of this matter prior to the initiation of litigation, please contact WildEarth Guardians at the information below.

Sincerely,



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Black gunk leaking into Sand Creek and South Platte contains cancer-causing benzene, EPA tests show

Posted: 12/01/2011 11:06:25 AM MST
 Updated: 12/01/2011 11:38:29 AM MST **By Bruce Finley**
The Denver Post

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Crews try to clean up a black substance that the EPA says contains cancer-causing benzene. (Bruce Finley, The Denver Post)

U.S. Environmental Protection Agency clean-up coordinators today said the black goo leaking from the Sand Creek shoreline north of downtown Denver is a "a gasoline-like material" that contains cancer-causing benzene.

"It has benzene in it," EPA Emergency Response Manager Curtis Kimbel said.

Since Monday, the federal agency has been managing work to keep the black liquid leaking from the banks of Sand Creek from fouling the South Platte River, a major source of drinking and agricultural water for northeastern Colorado.

On Wednesday, Kimbel said a plume migrating from Suncor Energy's refinery and under property owned by Metro Wastewater was daylighting at the creek.

Suncor processes oil sands crude from Canada

in Commerce City, producing about 93,000 barrels per day of gasoline, diesel fuel and paving-grade asphalt.

Kimbel said he still is awaiting the complete results from lab tests of samples collected this week, but so far there does not appear to be any signature chemicals from processing of oil sand crude in the underground plume.

Clean-up crews meanwhile are reinforcing the sandbags and dams adjacent to Sand

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Creek that are designed to stop the black liquid from further contaminating the creek and the river.

Kimbel said EPA will conduct "an extensive investigation to determine the source" of the pollution.

Wednesday, state health department officials noted that a pipe had broken under a storage tank at the refinery. However, today Kimbel said the break "happened quite some time ago" and "is a long ways away" from the creek and so it remains unclear whether it is the source of the plume.

Emergency response coordinators have discussed a strategy for following the plume back from the creek shoreline toward the refinery, but the focus is on containing the mess in the creek as snow falls over the Denver area.

Round-the-clock work since Monday "has significantly reduced the amount of



A worker is reflected in water mixed with an unidentified liquid floating atop Sand Creek north of downtown Denver, Wednesday November 30, 2011. (Craig F. Walker, The Denver Post)

material that has gone into the river," Kimbel

said. "We have not seen dead fish or birds."

It remains unclear how long the pollution has been leaking into the water. A fisherman reported a murky sheen on the water and a foul odor on Sunday morning.

State health officials on Wednesday were exploring legal options and preparing a written order they expect to issue to Suncor today, a spokesman said. The order will specify actions the company "must take to address on- and offsite contamination."

No public health warnings have been issued.

Several cities, including Aurora, rely on the South Platte for drinking-water supplies.

Aurora Water is not drawing water from the river, utility spokesman Greg Baker said.

"CDPHE did notify us of the situation so we can monitor it," Baker said. "If contamination were to occur at a time when we were using our river supply, we have numerous protocols in place to ensure that any impact on the river will not affect our drinking-water



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supply."

The confluence of the creek and river is a focal point of the Sand Creek Regional Greenway, which includes a recreational path along the creek that draws runners, cyclists and other recreational users.

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