

Greg Fink, EHS Director
Northland Environmental, LLC
275 Allens Avenue
Providence, Rhode Island 02905

March 2, 2016

**RE: Northland Environmental, LLC
LETTER OF NON COMPLIANCE and RELEASE of NOTICE OF VIOLATION
File No.: OCI-HW-14-102**

Dear Mr. Fink:

The Department of Environmental Management (DEM) Office of Waste Management (OWM) conducted an inspection of the Northland Facility located at 275 Allens Avenue in the city of Providence, Rhode Island on August 4, 2015 and found the following issues of noncompliance with the *RULES AND REGULATIONS FOR HAZARDOUS WASTE MANAGEMENT* (the “HW Regulations”) and the Permit issued to Respondent to operate a Treatment, Storage and Disposal Facility (the “Permit”).

ISSUES of NON COMPLIANCE

Tracking Numbers- failure to mark the following containers with a unique identification (tracking) number prior to storing the containers at the Facility:

- 1) Building 11 staging area (next to the administrative offices) – twenty one containers of pharmaceutical hazardous waste, including PRO-5706-014 chemotherapy waste, received on July 30, 2015, had no receiving tags. The receiving tags were placed on the containers during the inspection.
- 2) Building 11 Lab Pack Area- eighteen containers were observed without receiving tags, although there was a stack of tags located on top of one of the containers

Labeling and incompatible waste storage- failure to label or properly store the following containers at the Facility:

- 1) Building 11 Staging Area- two fifteen gallon containers that contained phosphoric acid and sulfonate oleic acid with both nonhazardous and hazardous waste labels on the same container.

- 2) Building 11 Acid Room – a box with a corrosive label and a nonhazardous label on the same box; and a pallet of batteries with no label attached (the label had been filled out, but the shrink wrap had not been applied to the pallet).
- 3) Building 4 –one five gallon container with no label, had “fixer spent” written on the top of the container; and two containers, one storing bleach the other ammonia, were stored adjacent.

COMPLIANCE SCHEDULE

Immediately upon receipt of this letter, unless already accomplished, properly label or mark all drums and containers and separate all incompatible hazardous waste in accordance with the Hazardous Waste Regulations. Within 10 days of receipt of this letter, submit documentation that the above compliance issues have been corrected and contact Yan Li of the Office of Waste Management at (401) 222-4700 in order to verify compliance with the Hazardous Waste Regulations and CFR regarding the generation and management of hazardous waste.

RELEASE of NOTICE OF VIOLATION

The DEM Office of Compliance and Inspection (OC&I) reviewed the documents that were submitted to DEM on October 8, 2015 and determined that all requirements in the order section of the Notice of Violation dated August 17, 2015 (NOV) have been satisfied. Also, DEM acknowledges receipt of a check in the amount of Twenty-seven Thousand Five Hundred Dollars (\$27,500.00). This payment satisfies the administrative penalty of Sixty-three Thousand Seven Hundred and Fifty Dollars (\$63,750.00) that was assessed in the NOV.

As such, all the issues in the NOV have been resolved. DEM hereby releases the NOV and considers the matter closed.

If you have any questions, you may contact me at 401.222.1360 ext. 7407; or Yan Li of the Office of Waste Management at (401) 222-4700, ext. 7529.

Sincerely,

Tracey D'Amadio Tyrrell
Supervising Environmental Scientist
Office of Compliance and Inspection

xc: J. LoBianco, Esq., OLS
L. Grandchamp, OWM