



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

MAX ENVIRONMENTAL TECHNOLOGIES, INC.
YUKON FACILITY
233 MAX LANE
YUKON, PENNSYLVANIA

EPA ID NO. PAD 004 835 146

Prepared by
RCRA Corrective Action Program
Land, Chemicals and Redevelopment Division
August 2020

Table of Contents

Section 1: Introduction	1
Section 2: Facility Background	2
Section 3: Environmental Investigations and Corrective Action	4
Section 4: Corrective Action Objectives	7
Section 5: Proposed Remedy	8
Section 6: Evaluation of Proposed Remedy	8
Section 7: Financial Assurance	10
Section 8: Public Participation	10
Section 9: Signature	10
Section 10: Index to Administrative Record	11

List of Acronyms

EPA	Environmental Protection Agency
COA	Consent Order and Agreement
COPC	Constituent of Potential Concern
Final Decision	Final Decision Response to Comments
MAX	MAX Environmental Technologies, Inc.
MCL	National Primary Drinking Water Standard Maximum Contaminant Level
PADEP	Pennsylvania Department of Environmental Protection
RCRA	Resource Conservation and Recovery Act
RSL	EPA Region III Screening Level for tap water

List of Figures

Figure 1: Facility Location

Figure 2: Facility Layout

Section 1: Introduction

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis to solicit public comment on its proposed remedy for the MAX Environmental Technologies, Inc. (MAX) Yukon Facility, located in Yukon, Pennsylvania (hereinafter referred to as MAX Yukon or the Facility).

EPA believes the cleanup actions MAX has implemented under Pennsylvania Department of Environmental Protection (PADEP) oversight at the Facility, which EPA proposes MAX continue to implement as described further in this Statement of Basis, will satisfy MAX's corrective action obligations under RCRA.

Therefore, EPA's proposed remedy for the Facility consists of the following components:

1. Continued compliance with the terms and conditions of the PADEP Hazardous Waste Permit No ID # PAD004835146 (Hazardous Waste Permit) and PADEP Solid Waste Permit No. 301071 (Solid Waste Permit) (together, the Permits); issued by PADEP (formerly the Pennsylvania Department of Environmental Resources), and
2. Additional monitoring of residential water supply wells adjacent to Disposal Area 6 for parameters related to that disposal area.

This Statement of Basis highlights key information relied upon by EPA in proposing its remedy for the Facility.

The Facility is subject to EPA's Corrective Action program under the Solid Waste Disposal Act, as amended, commonly referred to as the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6901 et seq. The Corrective Action program requires that facilities subject to certain provisions of RCRA investigate and address releases of hazardous waste and hazardous constituents, usually in the form of soil or groundwater contamination, that have occurred at or from their properties. The Commonwealth of Pennsylvania is not authorized for the Corrective Action Program under Section 3006 of RCRA. Therefore, EPA retains primary authority in the Commonwealth of Pennsylvania for the Corrective Action Program.

EPA is providing a forty-five (45) day public comment period on this Statement of Basis. EPA may modify its proposed remedy based on comments received during this period. EPA will announce its selection of a final remedy for the Facility in a Final Decision and Response to Comments (Final Decision) after the public comment period has ended. Concurrently with this Statement of Basis, EPA is soliciting comments on a draft federal permit to be issued under Section 3004(u) of RCRA, 42 U.S.C. § 6924. The draft federal permit incorporates the Facility's PADEP Permits.

Information on the Corrective Action program as well as a fact sheet for the Facility can be found by navigating to: <https://www.epa.gov/hwcorrectiveactionsites/hazardous-waste-cleanup-max-environmental-technologies-incorporated-1>.

The Administrative Record for the Facility contains all documents, including data and quality

assurance information, on which EPA's proposed remedy is based. See Section 8, Public Participation, below, for information on how you may review the Administrative Record.

Section 2: Facility Background

The Facility is located approximately 30 miles southeast of Pittsburgh, PA, in South Huntingdon Township, Westmoreland County, Pennsylvania. The Facility is surrounded by agricultural, wooded and residential properties. Waste operations are permitted on 137 acres of the 160-acre Facility. (see Figure 1, Facility Location)

The Facility is currently owned by MAX which operates it as a treatment and disposal facility for hazardous and residual waste. The Facility was formerly owned by Mill Service, Inc., and began operations in 1964 in the location of a former strip mine. In 2002, Mill Service, Inc. changed its corporate name to MAX Environmental Technologies, Inc. The Facility has operated under Permits and Consent Order and Agreements (COAs) that directed the disposal operations, unit closures, environmental investigations, and environmental remediation at the Facility. The Facility currently operates under the Permits and two COA; ENF ID NO 346585S, and ENF ID NO 347065S, both of which were issued by PADEP on September 21, 2016.

The Facility initially accepted acids and other inorganic wastes from steel and glass manufacturing, electroplating, and other industries. The wastes were treated with lime to neutralize the acids and immobilize metals. The treated slurry was then placed in disposal impoundments. Historically, the largest volume wastes processed and disposed at the Facility were K061 (electric arc furnace dust) and K062 (spent pickle liquor). Since the 1990's, the wastes received at the Facility for treatment and disposal are primarily solids, including slag, electric arc furnace dust, metal-impacted soils, and drill cuttings from the oil and gas industry.

The Facility currently operates under the following Permits:

- The Solid Waste Permit authorizes the disposal of residual waste in Disposal Area 6 (formerly Impoundment 6). A major permit modification was issued in September 2016. The modification permits the vertical expansion of the active residual waste landfill, Disposal Area 6. The Solid Waste Permit also specifies the Facility-wide monitoring requirements and requires the submission of an annual evaluation of all groundwater and surface sampling and analysis.
- The Hazardous Waste Permit authorizes the storage and treatment of inorganic hazardous waste. The Facility is operating under an administrative extension to the permit issued in February 2005. The extension was granted while MAX implements the leachate management and delisting requirements of the COAs executed in September 2016.

Waste management units at the Facility include five closed impoundments, an active landfill, waste storage tanks and containers, waste treatment tanks, and a leachate management-wastewater treatment system. The waste management units and monitoring locations are depicted on Figure 2, Facility Layout, and are further described as follows.

Closed Disposal and Storage Impoundments

- Impoundments 1, 2, and 3: The three adjacent disposal impoundments collectively cover approximately 12 acres. The unlined impoundments operated from 1963 to 1978, prior to RCRA regulatory requirements. They received treated industrial waste, primarily waste acids from steelmaking. They were closed with waste left in place.
- Impoundment 4: The lined leachate management impoundment operated from 1978 through 1984, when it was replaced with aboveground storage tanks. It was clean-closed in 1986 by removing waste and subsoil and placing the material in Impoundment 5.
- Impoundment 5: The 13.5-acre hazardous waste disposal impoundment was constructed with a bentonite-clay liner and a leachate collection system, which consists of an underdrain layer and a perimeter collection system. It operated under interim status from 1978 until 1985, but a RCRA permit was never issued to the unit. MAX capped and closed the impoundment in 2002 in accordance with RCRA closure requirements.

Active Landfill

- Disposal Area 6, also known as Landfill 6, is an active residual waste landfill unit opened in 1988. It covers approximately 16.5 acres. It is constructed with a double liner, a leachate collection system, and a leak detection system. The Solid Waste Permit requires the disposal area to be capped within one year of final waste placement.

Waste Treatment and Storage Units

- Hazardous and residual wastes are chemically and physically treated in tanks to render them non-hazardous. Treatment processes include neutralization/precipitation, chemical reduction/oxidation, oil separation, solidification, and dewatering. Waste is stored in approved tanks, containers, and a containment building prior to and after treatment. Treated, non-hazardous waste is placed in Disposal Area 6 or disposed off-site.

Leachate Management/Wastewater Treatment System

- Leachate from the treatment and disposal units, contact surface water, and contaminated groundwater are treated at the Facility's wastewater treatment plant. The effluent is discharged to Sewickley Creek under NPDES Permit No. PA0027715.
- The sludge generated at the plant was previously disposed in Disposal Area 6 as a residual waste. In 2011, EPA determined that the sludge should be classified as a listed hazardous waste (FO39). The sludge is currently being managed and taken off-site as a listed hazardous waste until it is specifically delisted by PADEP. MAX submitted a delisting petition for the sludge to PADEP and the PA Environmental Quality Board on May 30, 2018, in compliance with the September 2016 COA between PADEP and MAX, which is under review.

Section 3: Environmental Investigations and Corrective Action

Environmental Investigations

Several hydrogeological investigations have been performed to characterize the geological, hydrogeological, and mining conditions at the Facility. Three groundwater flow zones are monitored: Redstone Coal, Pittsburgh Coal, and Pittsburgh Limestone. The Redstone Coal outcrops at the edge of Impoundments 1-3. It is not present under the other disposal units. The Pittsburgh Coal zone was removed from the Disposal Area 6 location by strip mining of the coal. Only the Pittsburgh Limestone is continuous beneath the Facility. Groundwater flows to the northwest in all three zones.

In the mid-1980's, PADEP-approved groundwater investigations showed that releases from the impoundments impacted the Redstone Coal zone and Pittsburgh Coal zone. The mine water was contaminated by the salts from the disposal of treated spent pickle liquor: chloride, nitrate, and sulfate. MAX was then required by PADEP to close Impoundments 1, 2, and 3; clean-close Impoundment 4; close Impoundment 5; and implement a groundwater remediation and monitoring system.

Current Monitoring Program

Currently, the Facility Wide Monitoring Program incorporates the closed impoundments and Disposal Area 6. The monitoring locations are identified in Figure 2, Facility Layout.

The monitoring requirements are specified in Appendix A of the Solid Waste Permit and the Facility Wide Monitoring Plan (Cribbs and Associates, Inc., 2013). The requirements include sampling of:

- groundwater at 26 wells in the three flow zones: Redstone Coal, Pittsburgh Coal, and Pittsburgh Limestone;
- groundwater at three private wells, located upgradient and side gradient of Disposal Area 6, that draw water from the Pittsburgh Limestone zone;
- surface water at 7 locations;
- one spring at the south embankment of Disposal Area 6; and
- sixteen leachate and seep management locations.

Sample analysis includes metals, calcium, ammonia-nitrogen, chloride, nitrate, sulfate, cyanide, volatile organic compounds, and phenols. The required analysis for each sampling point is based on the waste material managed in the sample area and an assessment of past sampling results. Chloride and nitrate are established as indicator parameters for release detection because they are primary contaminants associated with the disposal impoundments, and they are not associated with past coal mining impacts. All sample locations are analyzed for these indicator parameters.

Three residential wells, located approximately 200 foot to 300 feet from the perimeter of Disposal Area 6, are analyzed for chloride, nitrogen, and organic compounds. They are not analyzed for all parameters associated with Disposal Area 6.

As part of an investigation for proposed Landfill 7, MAX installed 13 monitoring wells in 2018 in the northern portion of the Facility near Sewickley Creek. The wells are screened to monitor the water table (if present above the Pittsburgh Coal horizon), Pittsburgh Coal horizon, and Pittsburgh Limestone.

Monitoring Assessment

In July 2020, MAX submitted a revised Facility-Wide Groundwater Assessment Report (2020 Assessment Report), including an evaluation of water quality from January 2015 through January 2020.

An evaluation of the most recent 8 quarters of monitoring data shows the following environmental conditions.

Groundwater - The following contaminants were detected above the EPA Drinking Water Standards: the National Primary Drinking Water Standard Maximum Contaminant Levels (MCLs) promulgated pursuant to Section 42 U.S.C. §§ 300f et seq. of the Safe Drinking Water Act and codified at 40 CFR Part 141, or EPA Region III Screening Levels (RSLs) for tap water, if there is no MCL for a contaminant.

Redstone Coal Groundwater Flow Zone

Only barium was detected above the EPA Drinking Water Standards. Barium exceeded the MCL of 2 mg/l in well, RC-2. Barium was detected at concentrations up to 4.62. It was not detected above the MCL in either of the downgradient Point-of-Compliance wells, RC-6A and W-2.

Pittsburgh Coal Groundwater Flow Zone

Manganese and nitrate were detected above the EPA Drinking Water Standards.

- Nitrate exceeded the MCL of 10 mg/l in two wells. Well PC-3 contained concentrations from 4.2 mg/l to 36.3 mg/l. Well SP-3, located within mine spoil backfill, contained concentrations from 4.2 mg/l to 34.8 mg/l.
- Manganese exceeded the RSL of 0.43 mg/l in 2 wells. Well PC-3 contained concentrations from 2.05 mg/l to 8.21 mg/l. Well PC-1 contained concentrations from 1.26 mg/l to 2.21 mg/l.

The Pittsburgh Coal zone is extensively deep mined beneath the Facility and the surrounding area. The groundwater is severely degraded by the past mining activities. It is not suitable for potable water use, with pH values as low as 3 S.U.

Pittsburgh Limestone Groundwater Flow Zone

Only fluoride was detected above the EPA Drinking Water Standards. Fluoride exceeded the MCL of 4 mg/l in 4 wells: W-4, W-5, W-10, and W-13. Concentrations in these wells ranged from 0.34 mg/l to 8.9 mg/l. An assessment of the aquifer characteristics indicates that the elevated fluoride may be originating from fluoride-bearing minerals in the limestone rock, with higher alkalinity groundwater areas showing higher concentrations of fluoride. Wells located along the downgradient property line, W-6, MW-702LS, and MW-704LS, show no fluoride concentrations above the MCL.

There were no exceedances of Drinking Water Standards in the three domestic water wells monitored.

Surface Water – Surface water is monitored at 7 locations for nitrate and chloride, as parameters that indicate a release may be occurring. No samples showed concentrations above the Drinking Waste Standards or Pennsylvania Surface Water Quality Standards.

Corrective Actions

Impoundments 1, 2, and 3: The disposal impoundments were closed in the late 1970's with a compacted soil covers, approximately three to five feet thick. In the mid-1980's, PADEP determined that the covers were not effectively containing contaminants from the waste material. Under the direction of PADEP, MAX reclosed the impoundments by rebuilding the surface grading with residual waste, then installing a low-permeable cap on each unit to seal off precipitation infiltration. Impoundments 1 and 2 were reclosed and capped as one unit. Final closure was completed in 2013. PADEP determined that these actions effectively remediated the Redstone Coal zone. The point-of compliance wells show no contamination above the Drinking Water Standards.

Impoundments 4: Impoundment 4 was clean-closed in 1989 under PADEP oversight by excavating all accumulated waste material, PVC liner, dyke walls, and two feet (minimum) of subsoils. All the excavated material was deposited into Impoundment 5 prior to closure of that impoundment.

Impoundment 5: Impoundment 5 stopped operation in 1985. Cover material was placed over the waste surface, and the surface was monitored for settlement from consolidation of the waste in the impoundment. Due to continuing consolidation, PADEP allowed MAX to regrade the surface of the impoundment with residual waste to assure long-term positive drainage prior to final capping. A RCRA cap was then installed over the entire disposal area. Closure was completed with PADEP approval in 2002.

Groundwater Remediation: The pump and treat groundwater remediation system, which has been operating for over 25 years, has removed impacted groundwater from the Pittsburgh Coal flow zone. Accumulated coal mine water is withdrawn from pumping wells and conveyed to the on-site wastewater treatment plant. Only one of three pumping wells, PW-1, still produces enough water to pump. A time-trend analysis of groundwater over time (2007 through 2017) shows that water quality in the Pittsburgh Coal zone continues to improve over time.

Leachate Management: As required by the 2016 COA, ID# 347065S, and the Solid Waste Permit, MAX constructed leachate collection and storage system improvements for Disposal Area 6. Construction was completed between April 2017 and May 2018. System improvements included construction of:

- subbase for a new storage tank, including subsurface mine void stabilization;
- leachate storage tank for additional storage capacity (approximately 1.2 million gallons);

- leachate transmission lines from the landfill to the new storage tank, and between the new and existing storage tanks; and
- lined leachate collection trench around the interior perimeter of the landfill.

Section 4: Corrective Action Objectives

Soil: The Corrective Action Objective for soil is to prevent unacceptable exposure to human health and the environment from any hazardous constituents remaining in the soil.

EPA proposes this objective be achieved through protective caps. Except for Disposal Area 6, all contaminated material is already contained within a capped containment structure. Disposal Area 6 is an active landfill. The Solid Waste Permit requires placement of cover material over exposed waste at the end of every business day. It also requires final capping of the entire disposal area within one year of final waste placement.

- Impoundments 1, 2, 3, and 5 existing caps over the waste disposal areas and cap maintenance, required under the Solid Waste Permit, will achieve this objective.
- For Disposal Area 6, this objective will be achieved by meeting the Solid Waste Permit requirement to cap the disposal area within one year of final waste placement.

Groundwater: EPA expects final remedies to return groundwater to its maximum beneficial use within a timeframe that is reasonable given the particular circumstances of the project. For projects where aquifers are either currently used for water supply or have the potential to be used for water supply, EPA will use the National Primary Drinking Water Standard Maximum Contaminant Levels promulgated pursuant to Section 42 U.S.C. §§ 300f et seq. of the Safe Drinking Water Act and codified at 40 C.F.R. Part 141.

Ongoing groundwater monitoring shows sporadic exceedances of the Drinking Water Standards.

- The Redstone Coal flow zone meets Drinking Water Standards at the point of compliance wells.
- The Pittsburgh Coal flow zone contains manganese and nitrate above Drinking Water Standards at the point of compliance well PC-3. However, the aquifer is not suitable for potable water use due to degradation from past coal mining in the region. In addition, remediation of the aquifer continues under the pump and treat system required by PADEP.
- The Pittsburgh Limestone flow zone contains areas of fluoride concentrations that are up to twice the MCL of 4 mg/l. However, the 3 wells located along the downgradient property line, W-6, MW-702LS, and MW-704LS, show no fluoride concentrations above the MCL.
- The three residential well that are located within 300 feet of Disposal Area 6 are not monitored for the complete set of constituents related to the disposal area. The proposed remedy requires monitoring of the residential wells to include all the potential COPCs for Disposal Area 6, including fluoride.

The Corrective Action Objective for groundwater is to prevent unacceptable exposure to human health and the environment from contaminated groundwater. EPA proposes this objective be achieved by:

- compliance with the Permits, and
- monitoring of the residential wells for all COPCs for Disposal Area 6.

Surface Water: The Corrective Action Objective for surface water is to prevent the migration of contaminants to surrounding surface water at concentrations that may exceed Surface Water Quality Criteria.

Ongoing stream sampling shows no existing contamination. Ongoing monitoring as required by the Permits will ensure this objective continues to be achieved.

Section 5: Proposed Remedy

EPA's proposed remedy for the Facility consists of the following components.

1. Permit Compliance – MAX shall continue to comply with the terms and conditions of the Permits, including reporting to PADEP any releases or potential releases of hazardous waste from the Facility that may endanger public drinking water supplies or otherwise threaten human health or the environment.
2. Residential Water Supply Well Monitoring – In addition to the sampling parameters specified in Appendix A, page ix (Residential Water Supply Wells), of the 2016 Solid Waste Permit, MAX shall analyze the residential well water for the following: arsenic, barium, cadmium, fluoride, iron, lead, manganese, nickel, selenium, silver, ammonia, and sulfate. These additional analytes are based on the COPCs in Disposal Area 6 leachate. If EPA believes that additional corrective measures are necessary to protect human health and/or the environment from contaminants that remain in the groundwater above drinking water standards and that are attributable to releases from the Facility, EPA will solicit public comments on any such additional corrective measures prior to amending the FDRTC and including them in the final remedy for the Facility.

Section 6: Evaluation of Proposed Remedy

This section provides a description of the criteria EPA used to evaluate the proposed remedy consistent with EPA guidance. The criteria are applied in two phases. In the first phase, EPA evaluates three decision threshold criteria as general goals. In the second phase, for those remedies which meet the threshold criteria, EPA then evaluates seven balancing criteria.

Threshold Criteria	Evaluation
1) Protect human health and the environment	The primary human health and environmental threats posed by the disposal areas are related to direct contact with the waste and

	contamination remaining in place as well as any hazardous constituents leaching to the groundwater. These threats have been mitigated by the monitoring and closure activities required by PADEP under the Permits and the COAs.
2) Achieve media cleanup objectives	Media cleanup objectives were achieved and will continue to be achieved by consolidating, stabilizing, and capping the waste material.
3) Remediating the Source of Releases	Remediation of source areas was achieved by consolidating, stabilizing, and capping the waste material. In addition, groundwater monitoring and site inspections continue under the Permits to detect any releases that may occur in the future.

Balancing Criteria	Evaluation
4) Long-term effectiveness	Facility use restrictions under the Permits will maintain protection of human health and the environment over time by controlling exposure to contaminated waste and soil.
5) Reduction of toxicity, mobility, or volume of the Hazardous Constituents	Reduction of toxicity, mobility, or volume of hazardous constituents has already been achieved, as demonstrated by the data from the groundwater monitoring.
6) Short-term effectiveness	EPA's proposed remedy does not involve any activities, such as construction or excavation that would pose short-term risks to workers, residents, and the environment.
7) Implementability	EPA's proposed remedy is readily implementable. EPA does not anticipate any regulatory constraints in requiring the Facility property owners to continue compliance with the Permits and the COAs and to increase groundwater analysis at the residential wells.
8) Cost	The proposed remedy is cost effective. The cost of increasing groundwater analysis at the residential wells will be minimal.
9) Community Acceptance	EPA will evaluate community acceptance during the public comment period and provide an analysis in the Final Decision.
10) State/Support Agency Acceptance	EPA will evaluate state acceptance during the public comment period and provide an analysis in the Final Decision.

Overall, based on the evaluation criteria, EPA has determined the proposed remedy meets the threshold criteria and provides the best balance of tradeoffs with respect to the evaluation criteria.

Section 7: Financial Assurance

EPA has evaluated whether financial assurance for corrective action is necessary to implement EPA's proposed remedy at the Facility. PADEP requires financial assurance in accordance with the Permits. EPA has determined that additional financial assurance is not required.

Section 8: Public Participation

Interested persons are invited to comment on EPA's proposed remedy. The public comment period will last forty-five (45) calendar days from the date that notice is published in a local newspaper. Comments may be submitted by mail, or electronic mail to Maureen Essenthier at the contact information listed below.

A public meeting will be held upon request. A meeting will not be scheduled unless one is requested.

The Administrative Record contains all the information considered by EPA for the proposed remedy at this Facility. The Administrative Record is available at the following location:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Maureen Essenthier (3LD20)
Phone: (215) 814-3416
Email: essenthier.maureen@epa.gov

Section 9: Signature

Date: 8/17/20



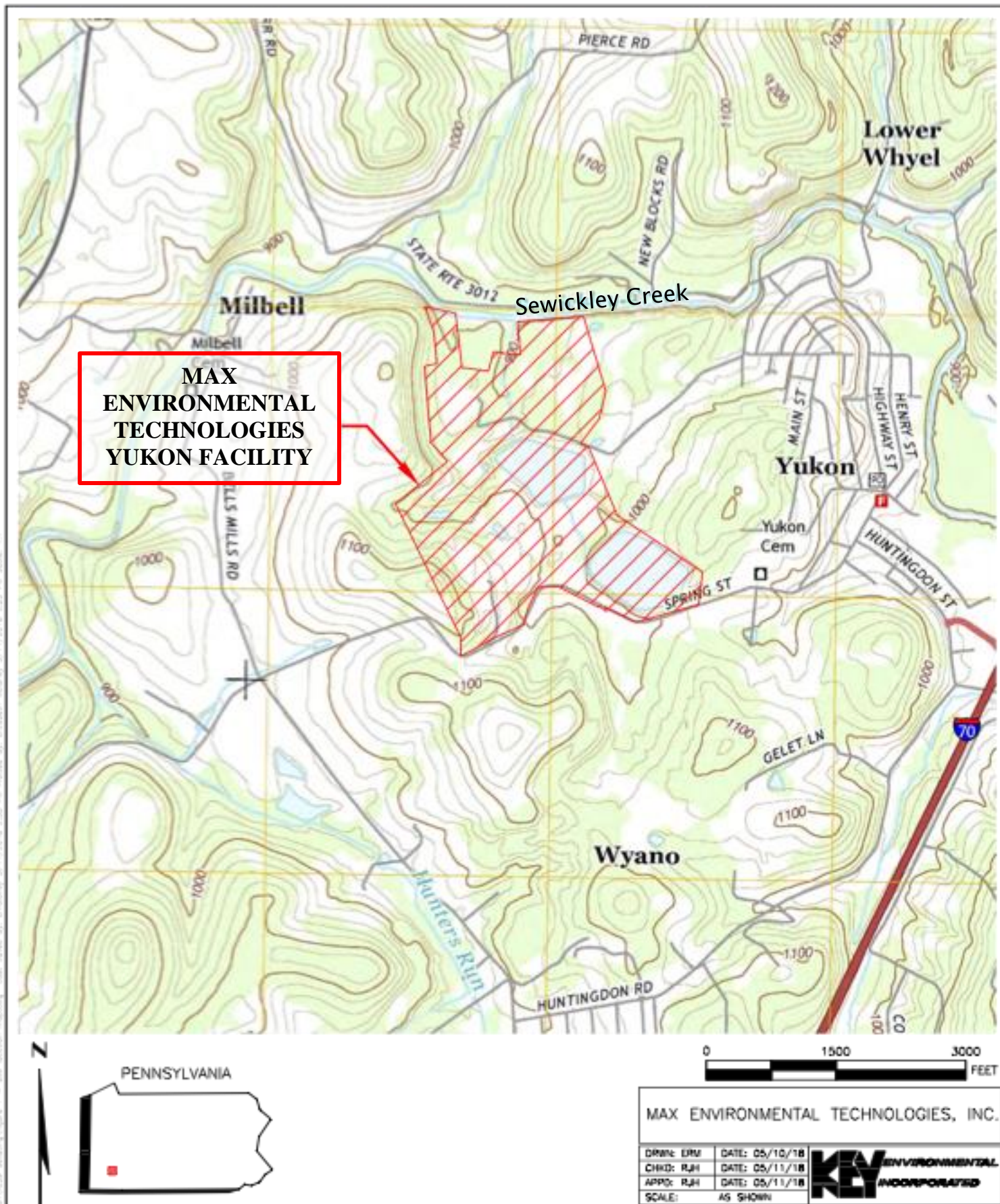
John A. Armstead, Director
Land, Chemicals and Redevelopment Division
US EPA, Region III

Attachments

Figure 1 - Facility Location
Figure 2 – Facility Layout

Section 10: Index to Administrative Record

1. Facility-Wide Groundwater Assessment Report, CEC for MAX, July 2020
2. MAX response to 1-7-2020 GW request, MAX email dated 2-5-2020
3. Groundwater Analysis Summary, 3rd Quarter 2017 through 2nd Quarter 2019, MAX
4. 3rd Quarter 2018 Groundwater Sampling, MAX, dated October 2018
5. Construction Certification Documents, September 2016 COA Related, CEC for MAX, October 2016 through May 2018
6. MAX Yukon Facility, F039 delisting petition, Key Environmental Inc, for MAX, dated May 30, 2018
7. First Amendment to FO39 Consent Order and Agreement, PADEP and MAX Environmental Technologies, dated March 28, 2018
8. Groundwater Time-Trend Plots, MAX, 2007 through 2017
9. Consent Order and Agreement (FO39, ENF ID NO 346585S), PADEP and MAX Environmental Technologies, dated September 21, 2016
10. Consent Order and Agreement (ENF ID NO 347065S), PADEP and MAX Environmental Technologies, dated September 21, 2016
11. PADEP Solid Waste Permit No 301071 (Residual Waste Disposal), issued 9/21/2016
12. MAX Environmental Technologies Fact sheet dated July 2014
13. Facility Wide Groundwater Monitoring Plan, Cribbs and Associates, Inc. for MAX. dated 2013
14. MAX Environmental Technologies Response to Request for information dated August 15, 2013
15. PADEP Hazardous Waste Permit No PAD004835146, issued February 14, 2005
16. MAX Environmental Technologies Inc Yukon Facility Capping of Pre-RCRA Disposal units Revised Plan, dated May 2005
17. Facility Wide Groundwater Monitoring and Reporting Plan, Mill Service dated July 1996
18. Mill Service Historical Environmental Audit, dated June 1992.
19. Mill Service - Yukon Plant Impoundment No 5 Closure Plan dated October 1986
20. Pennsylvania Department of Environmental Resources Consent Order and Agreement, dated 1985

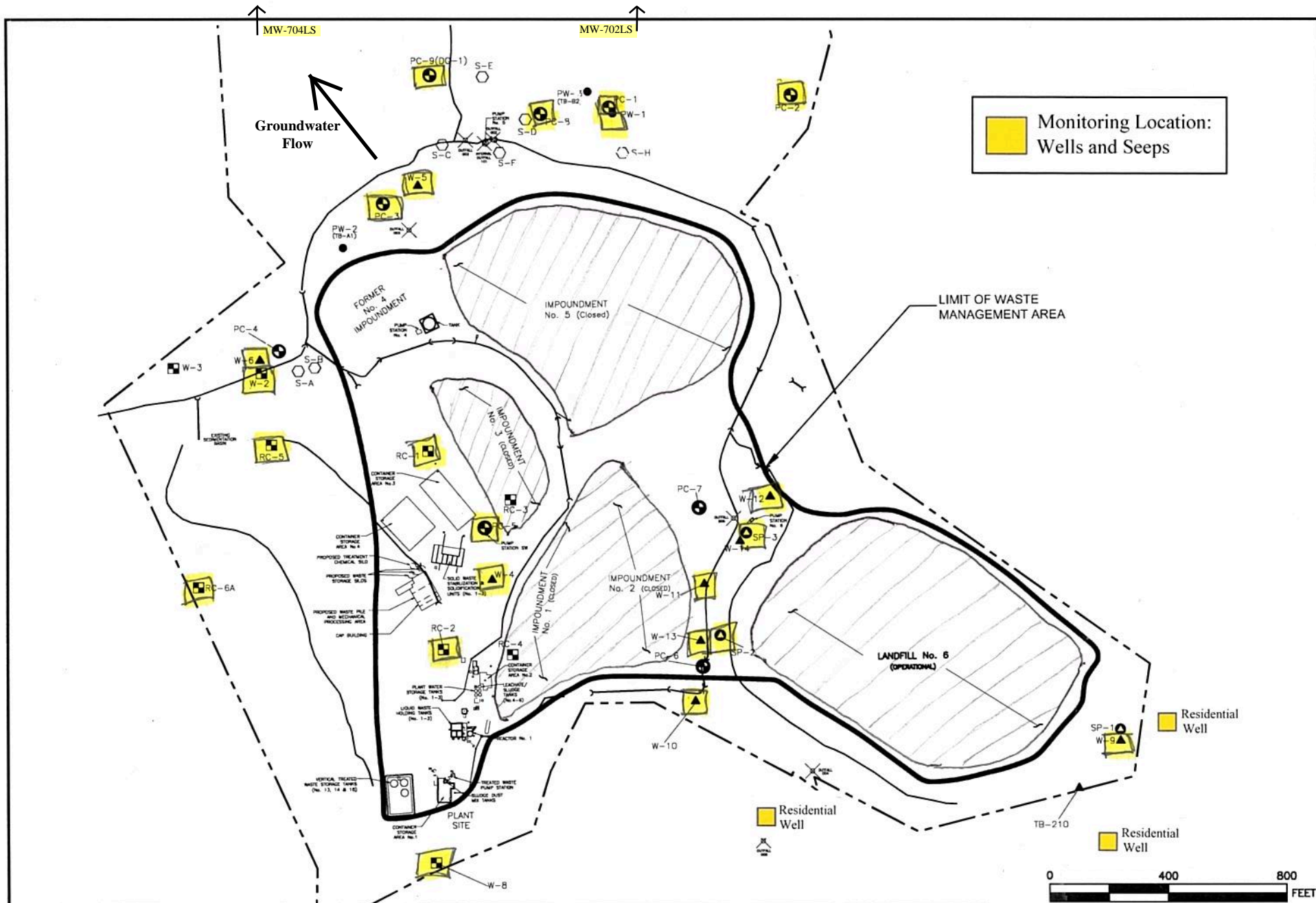


Statement of Basis

MAX Environmental Technologies, Inc. Yukon Facility

FIGURE 1

Facility Location



Statement of Basis

MAX Environmental Technologies Yukon Facility

FIGURE 2

Facility Layout

MAX ENVIRONMENTAL TECHNOLOGIES, INC.

DRWN: ERM	DATE: 05/10/18
CHKD: RJH	DATE: 05/11/18
APPD: RJH	DATE: 05/11/18
SCALE:	AS SHOWN

KEY ENVIRONMENTAL
INCORPORATED