



Glenn Springs Holdings, Inc.

A Subsidiary of Occidental Petroleum Corporation

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Reference No. 085121

Mr. Gregory Sutton
New York State Department of Environmental Conservation
Region 9
270 Michigan Avenue
Buffalo, NY 14203

Dear Mr. Sutton:

Re: Waste Transportation and Disposal Update
Project Schedule Update
Former Niagara Sanitation Site
Nash Road, Town of Wheatfield, New York

Glenn Springs Holdings, Inc. (GSH), is providing this letter to inform the New York State Department of Environmental Conservation (NYSDEC) that there has been a change of venue for the disposal of solid waste being generated at the Former Niagara Sanitation Site (Nash Road) project. As you are aware, the solid waste was scheduled to be transported to the Clean Harbor's Sarnia, Ontario, Canada facility for disposal through thermal destruction (incineration) and in fact five tractor dump truckloads were transported to the Sarnia facility in mid-December. However, due to local political factors associated with the Sarnia facility, an internal decision was made to change the disposal facility from the Sarnia facility to two of Clean Harbors' facilities in the United States. Those two facilities are Clean Harbors thermal destruction unit (TDU) in Kimball, Nebraska, and its TDU in Aragonite, Utah. Both facilities are permitted to accept a wide range of waste codes, including those associated with the Nash Road Project. Fact Sheets for both facilities are attached.

As a result of the change in disposal facilities, a change in the transportation mode and route will also occur. Instead of utilizing tractor dump trailers, the solid waste will be shipped in intermodal containers via rail freight. The solid waste will be loaded into intermodal containers at the Site and once full, placed on a flatbed trailer for transport to the CSXT Transflo facility located at 1254 William Street, Buffalo, New York. Trucks will exit the site and head north on Nash Road to Niagara Falls Boulevard. From there they will head south on the boulevard and merge onto Interstate 290 East (I290E). They will follow the I290E and merge onto Interstate 90 West (I90W). They will then exit the I90W at William Street west and follow that to the Transflo facility. Once at the Transflo facility, six (6) intermodal containers will be loaded onto a rail car for delivery to the two TDU units. CSXT will transport the rail cars over their tracks from Buffalo to Chicago. The CSXT route will take

the loads through Erie, PA, Cleveland, OH and smaller towns in Ohio and Indiana before arriving in Chicago, Illinois. Once in Chicago, Union Pacific Railroad (UPRR) will take possession of the railcars and transport them directly to the Kimball, NE facility or to Clive, Utah. The UPRR route will take the loads through Illinois, Iowa, Nebraska, Wyoming, and Utah and pass by towns such as Cedar Rapids, Iowa, Omaha, Nebraska, Cheyenne, Wyoming and Salt Lake City Utah. Solid waste will be delivered directly to the Kimball, NE facility since a rail spur is located at the facility. Solid waste being shipped to the Aragonite facility will be delivered by UPRR to Clive, UT where it will be loaded onto a flatbed tractor trailer and transported approximately 13 miles to the Aragonite facility via Interstate 80 and Aptus Road.

In addition to providing you with notification of the transportation and disposal update, GSH has also updated the project schedule to include the additional sprung structure scope and the change in the excavation, backfilling and site restoration portion of the schedule that was affected by the additional work scope. The revised schedule is attached.

If you need any additional information, do not hesitate to contact me at (972) 687-7506 or email at Clint_Babcock@oxy.com.

Very truly yours,

GLENN SPRINGS HOLDINGS, INC.



Clint Babcock
Director Operations

CB/adh/1
Enclosures

cc: J. Branch, GSH
D. Hoyt, CRA

Aragonite, Utah Facility

Fact Sheet

The Aragonite incineration facility is located in the Great Salt Lake Desert approximately 75 miles west of Salt Lake City, Utah, in Tooele County. Its location is within a 100 square-mile zone established by the Tooele County Commission to be used exclusively for hazardous waste management activities. The nearest residential neighbor is approximately 45 miles southeast of the facility in Grantsville, Utah.

Within a 30-mile radius and in a southerly direction of the site, the land is used by the U.S. Army and Air Force for desert warfare training. The Federal Bureau of Land Management owns 95% of the land in the surrounding thirty miles.

Facility Description & General Information

Start-up Date: 1991

Facility Size: 35 acres

Services Provided

- Rotary Kiln Incineration Technology
- Storage prior to final Treatment and/or Disposal
- Direct Burn liquids and sludge from tankers
- Disposal of TSCA/RCRA bulk and containerized waste including labpack containers
- DEA Controlled Substance Reverse Distributor, Schedules 1-5
- Rail served by both Union Pacific and Burlington Northern Railways

Typical Customers: Refineries, R&D facilities, colleges and universities, government research facilities, pharmaceutical companies, chemical facilities, state and municipal agencies, manufacturers, medical facilities.

Typical Waste Streams: Contaminated process wastewaters, inorganic cleaning solutions, oils, spent flammable solvents, organic and inorganic laboratory chemicals, paint residues, debris from toxic or reactive chemical cleanups, off-spec commercial products, household hazardous, DEA controlled substances, infectious and medical waste.



Clean Harbors Permitted Services

- US EPA ID No. UTD981552177
- Notification of Hazardous Waste Activity UTD981552177
- Notification of PCB Activity UTD981552177
- Conditional Use and Zoning Permits (Tooele County)
- Title V Air Permit 4500048001
- CERCLA Approval
- RCRA Construction and Operation of a Hazardous Waste Facility UTD981552177
- TSCA (Transfer, Storage of PCBs) UTD981552177
- DEA Controlled Substance Registration Certificate # RC0331049
- Laboratory Certification (NELAP)
- APHIS Soil (Permit to import soils) P330-94-0036

Treatment, Storage and Disposal Capabilities

- Drum Storage Capacity (RCRA/TSCA): 550,000 gallons (10,000 drums)
- Liquid Tank Storage Capacity (RCRA/TSCA): 480,000 gallons
- Sludge Tank Storage Capacity (Non-Flammable RCRA/TSCA): 30,000 gallons
- Bulk Solid Tank Storage Capacity (Non-Flammable RCRA/TSCA): 1,200 cubic yards at Aragonite. With the neighboring Clive facility, Aragonite can receive and store rail quantities and event business.
- Wide range of permitted waste codes

Kimball, Nebraska Facility

Fact Sheet

The Kimball facility utilizes a fluidized bed incinerator. This state-of-the-art thermal oxidation incinerator is capable of maximum destruction efficiencies of hazardous waste and is able to handle a wide variety of feeds. Ash from the incinerator is treated on-site, delisted, and then placed in an on-site monofill built to RCRA Subtitle C standards. No other commercial incinerator in the United States has been approved for delisting of incinerator ash.

Supported by the local community, the Kimball site provides generators with one of the lowest liability options for waste management.

Facility Description & General Information

Start-up Date: 1995

Facility Size: 640 acres

Services Provided

- Incineration
- Container Storage, Consolidation, and Transfer

Typical Customers

Electronic equipment; chemical, plastics, and machinery manufacturers; laboratories; utilities; petroleum distribution; and government facilities.

Typical Waste Streams

Contaminated process wastewaters; soils; solids; residues from chemical process industry; oils; spent flammable solvents; paint residues; and chemical spill cleanups.



Clean Harbors Permitted Services

- Hazardous Waste Incinerator and Storage Facility Modified Permit (RCRA Permit) Permit No. NED981723513
- Regulatory Amendment to Title 128, Appendix IV (Delisting)
- National Pollutant Discharge Elimination System (NPDES) Authorization to Discharge (NPDES Stormwater Discharge Permit) Permit No. NE0127892
- Solid Waste Management Permit (Monofill Permit) No. NE0203238
- Class I Air Operating Permit #03-RI-001

Treatment, Storage and Disposal Capabilities

- Feed Capacity: 21,467 pounds per hour (solids, liquids, sludge)
- Storage Capacity:
 - For Non-Bulk Containerized Waste: 590,840 gallons
 - For Bulked Liquid Waste: 389,820 gallons
 - For Bulk Container Storage: 9,429 cubic yards

