



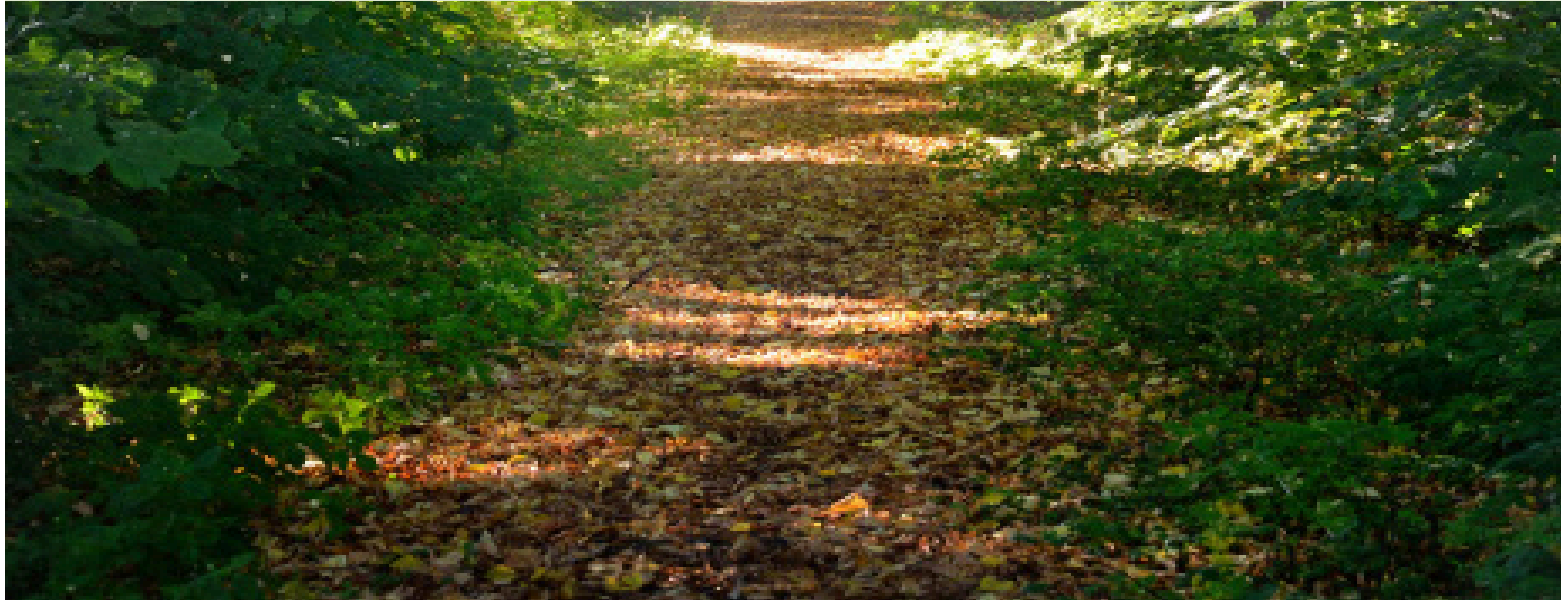
# TEMARRY RECYCLING **SOQ**

STATEMENT OF QUALIFICATIONS





Legal Authorization – Sustainability – Waste to Energy



# Temarry Recycling

Recycling is not a luxury,  
it is a necessity!



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## Temarry Recycling

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## Temarry Recycling's SOQ

With over 19 years of experience as Owner-Operator of a Recycling Facility, Matt inherited his experience from his Grandfather who owned one of the few solvent recycling operations in the Los Angeles area for over 50 years prior to RCRA publication in 1976.

In the early 90's Matt's Grandfather decided to retire and in continuing with the family tradition, Matt decided to open the facility in the border town of Tecate, Mexico to serve a growing Maquiladora Industry (US manufacturing operations located on the Mexican side of border towns) as well the Southern California market.

***Matt Songer, CEO***

Follow us on:   



# Introduction

Environmental Health and Safety Regulations comparison between USA and Mexico. Applicability for Exporting Hazardous Waste from US to Mexico.

## Environmental Compliance.

The United States of America environmental regulatory/compliance program relies on the Resource Conservation and Recovery Act (RCRA) in 1976. From this law, Title 40 of the Code of Federal Regulations Part 260 to 270 establishes the requirements for Generators, Transporters and Operators of Treatment, Storage and Disposal facilities (TSDF). Part 262 Subpart E regulates the Export of Hazardous Waste.

Similar to RCRA, Mexico's environmental regulatory/compliance program relies on LGEEPA (General Law of Ecological Equilibrium and Protection of the Environment) published in 1988 and amended for waste management in 2006 with the promulgation of LGPGIR (General Law for the Prevention and Integral Management of Waste). This updated "law" has been specifically designed to conduct the national policy on hazardous, special and non-hazardous waste.



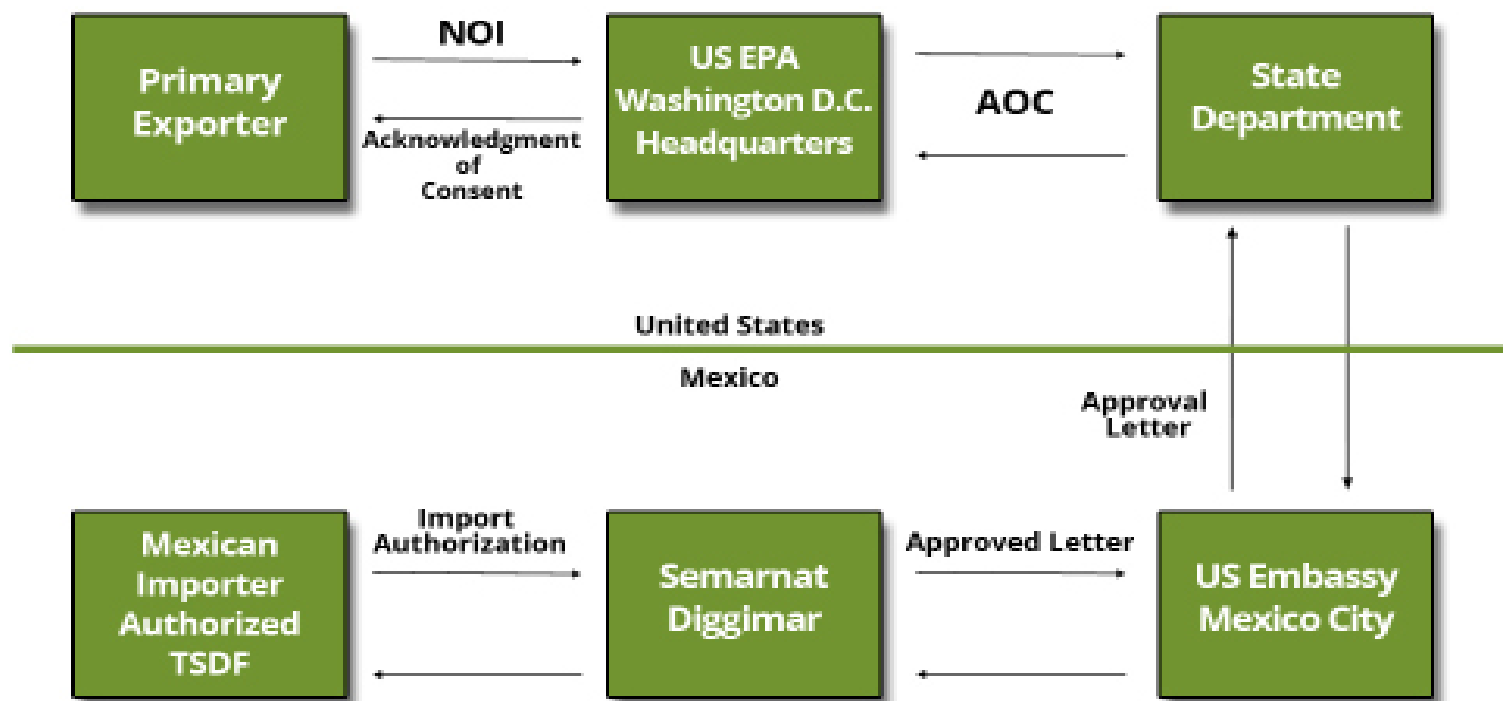
For the compliance of LGPGIR, Mexican government published the Rules ("reglamento") comparable to 40CFR260-270 that establishes special requirements for Generators, Transporters and Treatment, Storage and Disposal facilities. Furthermore, the Mexican legal system requires that for each Rule Guide ("reglamento") a set of Technical Standards must be published to guide the public on specific requirements for compliance issues. Currently, there are 13 technical Standards/ Norms published for Hazardous Waste Management.

Some of the main provisions are: (see diagram related to Export Notification in section 6)

- Cradle to Grave Liability is applicable according to Mexican environmental regulations (LGPGIR) when an approved Treatment, Storage and Disposal Facility receives the waste from a foreign source/generator since they are acting as Importer of Record. (article 117 LGPGIR)
- Only Hazardous Waste for Recycling and Co-Processing (Heat/Energy Recovery) are allowed to be imported into Mexico and the receiving facility must have a valid permit. (article 115.1 from LGPGIR)
- The Special Manifest System provisions establishes that the Uniform Hazardous Waste Manifest must be accompanied with a copy of the AOC for each shipment. The Receiving Facility must be the foreign country approved facility and the signature of the manifest must be provided by the foreign country receiving facility. (See attached diagram of The Manifest System/Handling & Liability Sharing)

Enforcement of the environmental regulations in Mexico are conducted by PROFEPA (Federal Attorney for Environmental Protection), similar to State of California Department of Toxic Substances Control (DTSC).

### Export Notification (Liability Sharing)



# Health & Safety Regulations

Similar to OSHA regulations, Mexican regulatory system regarding Health and Safety relies on STPS (Labor Secretariat and Social Prevention). As all Mexican regulations, Health and Safety regulations are formed by the Law, its Rules (“reglamentos”) and Technical Standard Norms. There are over 100 Technical Norms on Health and Safety.

Some of the provisions that Mexican H&S regulations cover are:

- On the Job Safety
- Training Requirements
- Workers Environment (Exposure to HM)
- Chemical Substances (Right to Know)
- Machinery and Equipment safety
- Personal Protection Equipment
- Safety Signs and Color Codes
- Medical Surveillance
- First Aid
- Fire Prevention Brigade

### Safe Work Practices

- Temarry adheres to accepted safe work practices
- Temarry fully realizes that every employee must be provided with the proper tools for their expected duties, including training and re-training. Tools must be properly maintained

**Temarry maintains a drug free work place policy.**



QUESTIONS AND ANSWERS  
REGARDING EXPORTING  
HAZARDOUS WASTE INTO  
MEXICO

1. How is the Uniform Hazardous Waste Manifest completed for exporting my waste into Mexico?

The Federal Uniform Hazardous Waste Manifest (EPA Form 8700-22) is completed similar to domestic shipment except:

- a) In lieu of a US based Designated Facility name and address (item 8), the generator will list the foreign country receiving facility, which in our case will be “Recicladora Temarry de Mexico, S.A. de C.V.”. In 2013 EPA issued an EPA ID number to Recicladora Temarry. The number used in block 8 of the Uniform Hazardous Waste Manifest is MXC130619001.
- b) Item 7 (Transporter 2/ Company name) will be completed with the Name of the transporter that will be delivering the waste to the designated facility, along with the transporter EPA identification number. The transporter taking it across the border will either be Temarry Recycling, Inc or TRIMSA Trucking.

There may be other transporters before the company that actually delivers to Recicladora. In that case there will be a continuation page to reflect the various transporters.

- c) In item 14 EPA has asked that the words, “Exporter of Record: Temarry Recycling, Inc” be used.
- d) In item 16 the Box that indicates Export from U.S. should be marked and the Port of Exit will be Otay Mesa, CA. The export date will be filled in when the transporter reaches the border crossing.

- e) Item 20 Designated Facility Owner or Operator: certification of receipt of hazardous materials covered by the



manifest, is signed by the foreign country receiving facility (“Recicladora Temarry de Mexico, S.A. de C.V.”) And the proper recycling codes will be written on items 19 (1-4).

2. How is my waste taken across the border?

Once the waste stream approval process is completed with Temarry Recycling, Inc and a shipment is scheduled, our US based approved transporter picks up the load at a Generator site (as Transporter 1 on the Manifest). Transporter 1 may also be a service provider company that takes the waste to their 10 day transfer facility. The trailer (box van or tanker) is hauled to the Otay Mesa area in San Diego, CA where our Mexican transporter (Transporter 2 on the Manifest) tractor hauls the trailer through US/Mexican Customs compounds. Once Customs procedures are cleared, the Mexican transporter takes the load to Recicladora Temarry de Mexico, S.A. de C.V. facility in Tecate, B.C. (A drive that takes no more than 45 minutes from the border).

3. What happens with my Generator Liability? (Cradle to Grave Liability)

Generator liability for the U.S. generator technically ceases once the waste crosses the US border and is imported by

the receiving facility in Mexico. Mexican environmental regulation provisions for importation of waste consider the Mexican Importer of Record and Approved Designated Facility as the “new” Generator for the waste being imported into Mexico, acquiring full responsibility for title of the waste to be recycled or co-processed. Liability transfer is described in the LGPGIR (Mexican Law and Regulations for Integral Waste Management) Only hazardous wastes for Recycling or Co-Processing (Fuels/Energy Recovery) are allowed to be imported into Mexico. No hazardous waste is allowed to be imported for landfill or any other land disposal treatment.

QUESTIONS AND ANSWERS  
REGARDING EXPORTING  
HAZARDOUS WASTE INTO  
MEXICO

4. What happens with the recycled products?

As a “True Recycling” company, Temarry considers that recuperating valuable commodities, such as solvents and energy, enable us to contribute to the protection and enhancement of the environment by minimizing the purchase and production of petroleum based organic solvents. Your waste streams that are suitable for recycling through our distillation process are returned for industrial use in many manufacturing processes. Along with our customers/vendors, Temarry promotes the proper use of petroleum based products by having a network of distributors that ensure that the recycled products are blended and formulated to the exact specifications for industrial grade usage.

Still bottoms from our recycling processes are managed in accordance with all environmental regulations. Based on the characteristics, they are either transferred to our Co-Generation unit on site, or blended with other energy bearing liquids and sent to cement kilns to be burned as Supplementary Fuel. Once the still bottoms are burned as fuel the long term liability and cradle to grave responsibility has been completed.



5. Why ship my hazardous waste to Mexico? Because it is the highest level of sustainability and generates the smallest carbon footprint.

Backed up by over 20 years of experience in international relations, the US/Mexico Hazardous Waste Program has proven itself to be an efficient, verifiable system that tracks the proper management of hazardous waste. Temarry Recycling, Inc, with over 15 years of recycling in Mexico, is the Premier Recycling Facility in the Northwest part of Mexico and is an effective alternative for the Western United States. Domestic alternatives are typically thousands of miles away, increasing the carbon footprint and risk of long haul transportation. Temarry Recycling, Inc., is located 165 miles from Los Angeles, CA. Wastes received by Temarry are typically processed within 36 hours after receipt.

6. Do Temarry Recycling, Inc. and Recicladora Temarry de Mexico, SA de CV comply with all regulations?

Recicladora Temarry de Mexico, SA de CV, as a premier recycling facility, not only complies with ALL applicable regulations for Environmental Health and Safety issues, it operates to the most stringent regulations and is comparable to the U.S. standards. In fact, most regulatory programs applicable to hazardous waste management facilities that exist in Mexico are based on U.S. EPA and OSHA standards.



# History

Established in 1995 and operating since 1998 in Tecate, Baja California Mexico, Temarry's premier Recycling facility services the Northwestern states in Mexico and the entire Western Region of the United States.

With over 50 years of experience in the Solvent Recycling Industry in Southern California, Temarry operates a "True Recycling" and "Closed Loop Recycling System" which is a state of the art thermal processing unit for solid wastes that produce the required heat to operate the distillation units. Distillation Units recover valuable solvents, oils, glycols and other liquids for reuse in the industrial sector, our "Closed Loop Recycling System" is the only system in the western region that operates to such standards, complying with the most stringent environmental regulations.

As a fully authorized TSDF we serve most industrial sectors. Temarry is the essence of promoting sustainable industrial development. Valuable solvents are recovered by distillation for re-use before the residues are blended as an alternative fuel to be used in the cement industry. Carbon foot print is minimized by reducing the distance that the waste needs to travel before final disposal. Temarry is located 165 miles south of the Los Angeles area and 500/700 miles from Northern California/Utah preventing long haul transportation of over 1800 miles to the nearest thermal processing facility in the Midwestern United States.



# Our Management



## Matt Songer

Matt is the President and CEO of Temarry Recycling, Inc.

With over 19 years of experience as Owner-Operator of a Recycling Facility, Matt inherited his experience from his Grandfather who owned one of the few solvent recycling operations in the L.A. area for over 50 years prior to RCRA publication in 1976. In the early 90's Matt's Grandfather decided to retire and in continuing with the family tradition, Matt decided to open the facility in the border town of Tecate, Mexico to serve a growing Maquiladora Industry (US manufacturing operations located on the Mexican side of border towns) as well the Southern California market.

Today, Temarry serves over 1000 waste generators in the Western United States



## Teresa Ruiz Songer

Tere is V.P. of Temarry Recycling, Inc. and CEO of Recicladora Temarry de Mexico, our Mexican TSD Facility located in Tecate, Mexico. She is a past President of the Tecate Sector of the National Chamber of Commerce (CANACINTRA) and current Vice President of the National Chamber of Commerce (CANACINTRA). She currently volunteers as President of the Tecate sector of the Red Cross. With roots in Mexico City, She is an active member of the political community in Baja California Mexico and the country of Mexico.



## Larry Burton

With over 25 years of experience in the Hazardous Waste Industry including incineration, distillation, energy recovery and service distribution in the U.S. and Mexico, Larry is responsible for the development and implementation of the Import/Export Waste Recycling and Energy Recovery Program in the Western United States.

His regulatory and technical background support all of our Compliance Programs



## Mission & Vision



### MISSION

Temarry recycling is committed to provide a service of excellence in the handling and management of hazardous wastes from our customers, respecting their core values, our vendors and suppliers, our employees and the community where we operate, protecting and enhancing the environment and maintaining sustainable development in our business!

### VISION

To be the best alternative to our clients for the recycling and energy recovery of their waste streams, recognized for its operational excellence and the quality of its people.



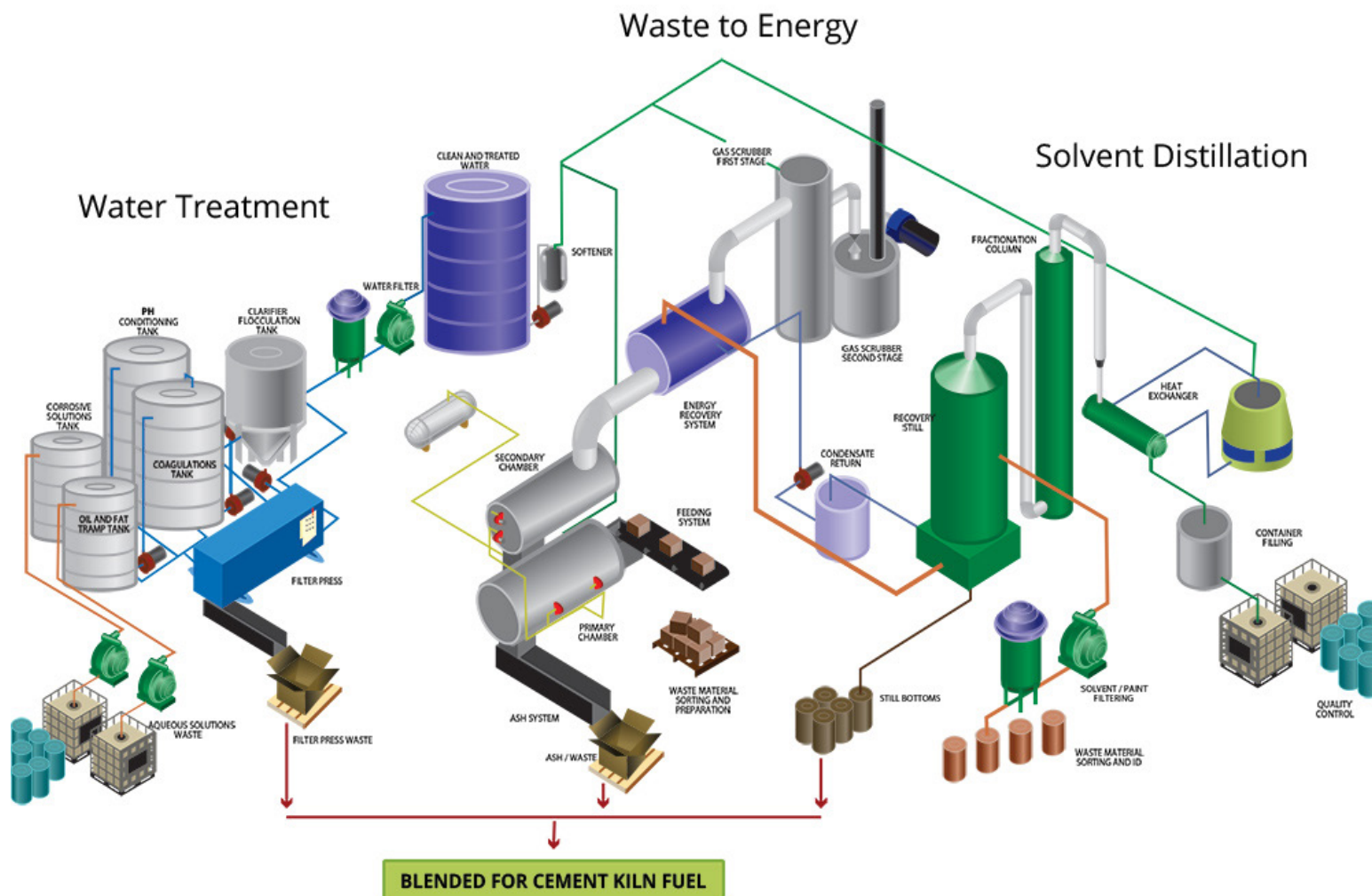
# TRUE RECYCLING AND CLOSED LOOP RECYCLING SYSTEM

## Solvent Recovery

1. Waste solvents are received, sorted and finger print analysis performed
2. Liquid drums are pumped and filtered
3. After filtering, solvents are pumped to the distillation unit
4. Volatilized solvent vapors expand into the fractionation column
5. Pure solvent is cooled down through a heat exchanger and is directed to a finished product tank
6. Product is packaged into drums and totes for distribution back in to industry

## Energy Recovery

1. Waste solids are received, sorted and finger print analysis performed
2. Solids are packaged into proper size burnable containers and placed on the feed conveyor
3. Burn in the primary chamber is initiated by clean burning propane gas that heats the primary chamber to 1500 F, which is the basic operating temperature. Once at this operating temperature, the unit becomes self-sustaining and the primary burner turns off. Heat then travels to the secondary chamber.
4. Solids, or ash, fall out of the burn unit on to the ash conveyor system and deposited into an ash hopper. Ash is later blended with other liquids for cement kiln fuel blending.
5. All vapor from the primary burn chamber are directed to the secondary chamber where there is a retention time of 2.5 seconds. All volatile organic compounds are eliminated by thermal destruction.
6. Thermal energy is converted to steam in our 200 horse power boiler. Steam is directed to the distillation units for use as a heat source.
7. Additional heat from the boiler is directed to a two stage venturi scrubber system to insure that only clean water vapor is emitted to the atmosphere
8. Stage two of the two stage gas scrubber



# OUR SERVICES



## DISTILLATION

Distillation is one of the most common separation processes used in industry to produce/recuperate valuable compounds.

In our industry, distillation is used to recover solvents (flammables, halogenated), glycols, oils, and other valuable materials that are reused by industrial operations, saving non-renewable oil derived products, and promoting green solutions to today's challenges of environmental pollution.

Temarry runs multiple distillation systems at our state of the art recycling facility located in Tecate, Mexico.

## ENERGY RECOVERY SYSTEM

Energy recovery is a widely used term to refer to processes where energy generated from an alternative fuel source is used to heat an industrial process.

Different names have been given to processes where alternative fuel sources are used, e.g. Cement kiln co-processing, industrial boiler/ furnace waste derived fuel systems, or energy recovery thermal treatment units. It's the use of such energy produced by the alternative fuel sources that impact a waste to energy recovery system. If there is no sustainable use of such energy, thermal processing becomes destructive incineration rather than a fuel recycling/recovery system.

Temarry's state-of-the-art energy recovery system integrates the benefits of high heat fuel alternative solid waste to recover the heat value of such waste streams to produce a valuable commodity in our recycling sys-



## CARBON FOOTPRINT

CARBON FOOT PRINT IS DEFINED AS:

The total amount of greenhouse gases produced to directly and indirectly support human activities, usually expressed in equivalent tons of carbon dioxide (co2).

Your carbon footprint is the sum of all emissions of carbon dioxide (co2), which were induced by your activities in a given time frame. Usually a carbon footprint is calculated for the time period of a year. The best way is to calculate the carbon dioxide emissions based on fuel consumption.

In the hazardous waste industry, waste transportation is one of the most impacting activities in the calculation of carbon footprint. It is considered that 1 gallon of diesel fuel consumed produces 9.95 kg of carbon dioxide.

Temarry's sustainable development program benefits the generators carbon footprint by being relatively close to the source of generation of the hazardous waste, from southern California (l.a. basin area) our facility is located approximately 165 miles (an average of 25 gallons of diesel fuel are consumed in this distance) and from northern California (bay area) we are nearly 500 miles away (an average of 80 gallons are consumed in this distance).



# PERMITS & Acknowledgements of Consents

All of Temarry Recycling's permits and acknowledgment of consents (AOC) are located on our website. Each year, Temarry must meet the same regulatory requirements that US TSDF facilities have in order to continue our operations.

We are proud of the fact that Temarry not only meets these requirements, but also exceeds them in several key areas. This attention to detail provides our clients with the confidence that their hazardous waste streams are being handled legally and efficiently.



# PERMITS



## TRANSPORTATION

DTSC Hazardous Material Transport  
CHP Haz Mat Certificate  
FMCSA Authorization  
CHP Terminal Rating



## INSURANCE

Workers Compensation Insurance Certificate  
Temarry Insurance Certificate  
Mexico Insurance Certificate



## USA PERMITS

Temarry EPA ID  
Temarry EPA ID Recicladora  
EPA Acknowledgment of Consent-Solids  
EPA Acknowledgment of Consent-Aqueous Corrosives  
EPA Acknowledgment of Consent-Flammable Liquids  
DTSC Notification



## MEXICO PERMITS

TSD Storage Permit — Spanish  
Recycling Permit 2010 — Translated Version  
Recycling Permit — Spanish 2010 -Solvents Solids  
Mexico Permit to Export 2014



## AUDITS

HTS Audit  
Temarry Passes DLA Audit



# Exportation Process

## Compliance Procedure to Export Hazardous Waste to Mexico

**RCRA Compliance:**

Applicability of 40 CFR 262 Subpart E.– Export of Hazardous Waste 262.51, 262.52, 262.53

**Consignee:**

Recicladora Temarry de Mexico, S.A. de C.V. (Fully Approved Treatment Facility by Mexican EPA with U.S. EPA # MXC130619001)

**Primary Exporter:**

Temarry Recycling, Inc. (A US Based Company with EPA ID # CAR000160754)

**EPA Acknowledgement of Consent:**

Promoted by and received approval for Temarry Recycling from US EPA to export waste into Recicladora Temar-ry de Mexico. (Valid for 1 calendar year)

**Receiving Country Consent:**

Authorization from Mexican EPA to Import Hazardous Waste into Mexico to a specific Consignee (Recicladora Temarry de Mexico, S.A. de C.V.) (Valid for 1 calendar year).

**Notice of Intent to Export:**

Notification done by Primary Exporter (Temarry Recycling, Inc.) in order to obtain EPA AOC. Exports done through Temarry’s services are covered for U.S. based generators. (Valid for 1 calendar year)

**262.54 Special Manifest Requirements.– Primary Exporter compliance:**

- a) Designated Facility Information:  
Recicladora Temarry de Mexico, S.A. de C.V. Can. Fed # 2 Mexicali–Tijuana Km 121,Col. San Pablo, Tecate, B.C.  
EPA ID: MXC130619001
- b) In block 14 include Primary Exporter: Temarry Recycling, Inc.
- c) Export Box on Manifest must be checked and Point of Exit will be: Otay Mesa, CA
- d) The new manifest has the statement pre-printed on item 16
- e) No changes to normal manifesting procedures

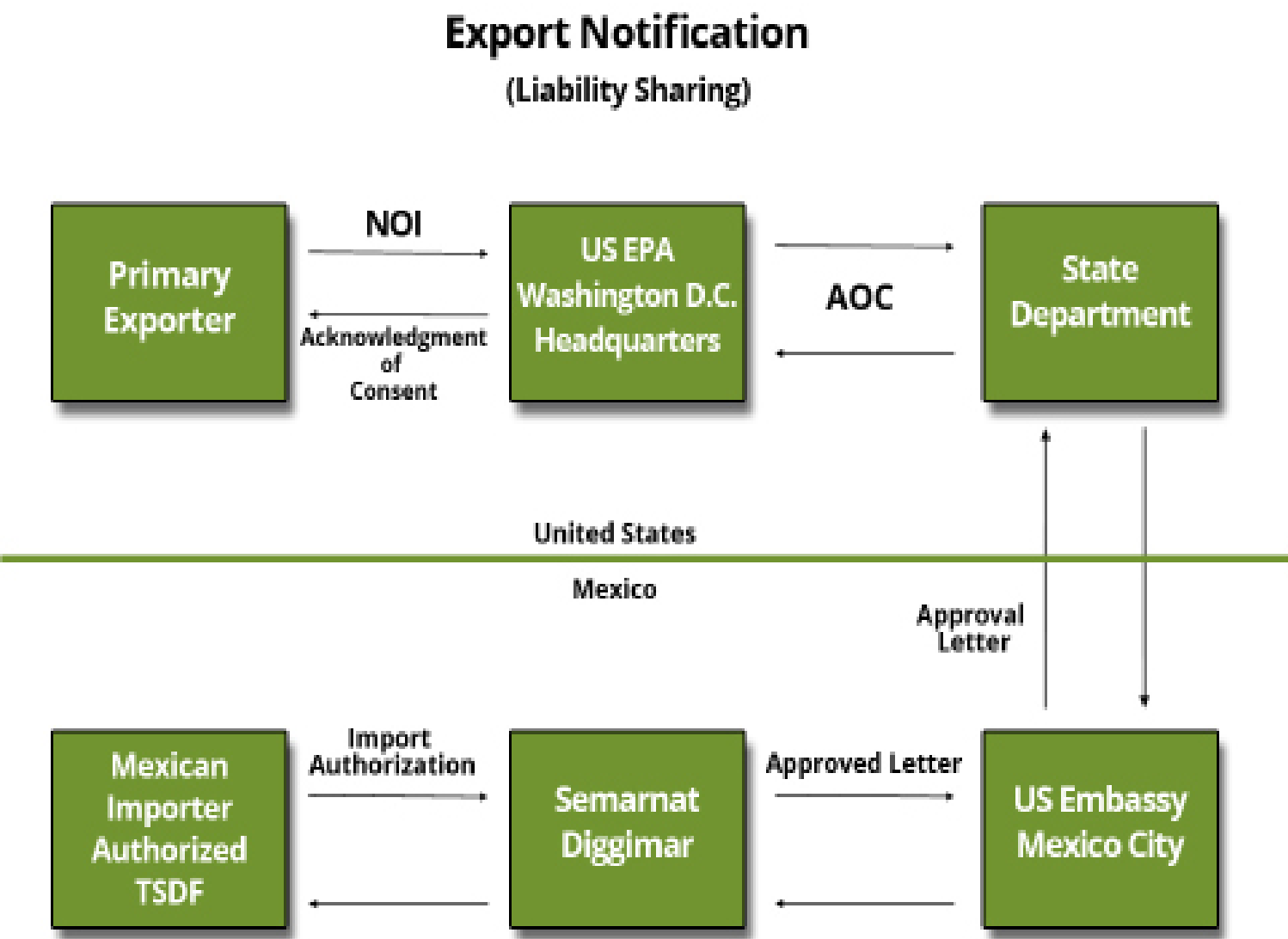
- f) Consignee will return signed copy of the manifest confirming receipt of hazardous waste to the generator
- g) N/A
- h) A copy of the EPA AOC accompanies every shipment. Temarry prepares the documentation package before the truck enters US Customs compound
- i) An additional copy is provided for delivery to US Customs official during crossing.

**262.56 Annual Reports**

Temarry Recycling files annual report with the US EPA Administrator no later than March 1 of each year for previous calendar year’s activity of hazardous waste exports to Mexico.

**262.57 Recordkeeping**

Temarry keeps records for more than 3 years as required by regulations.

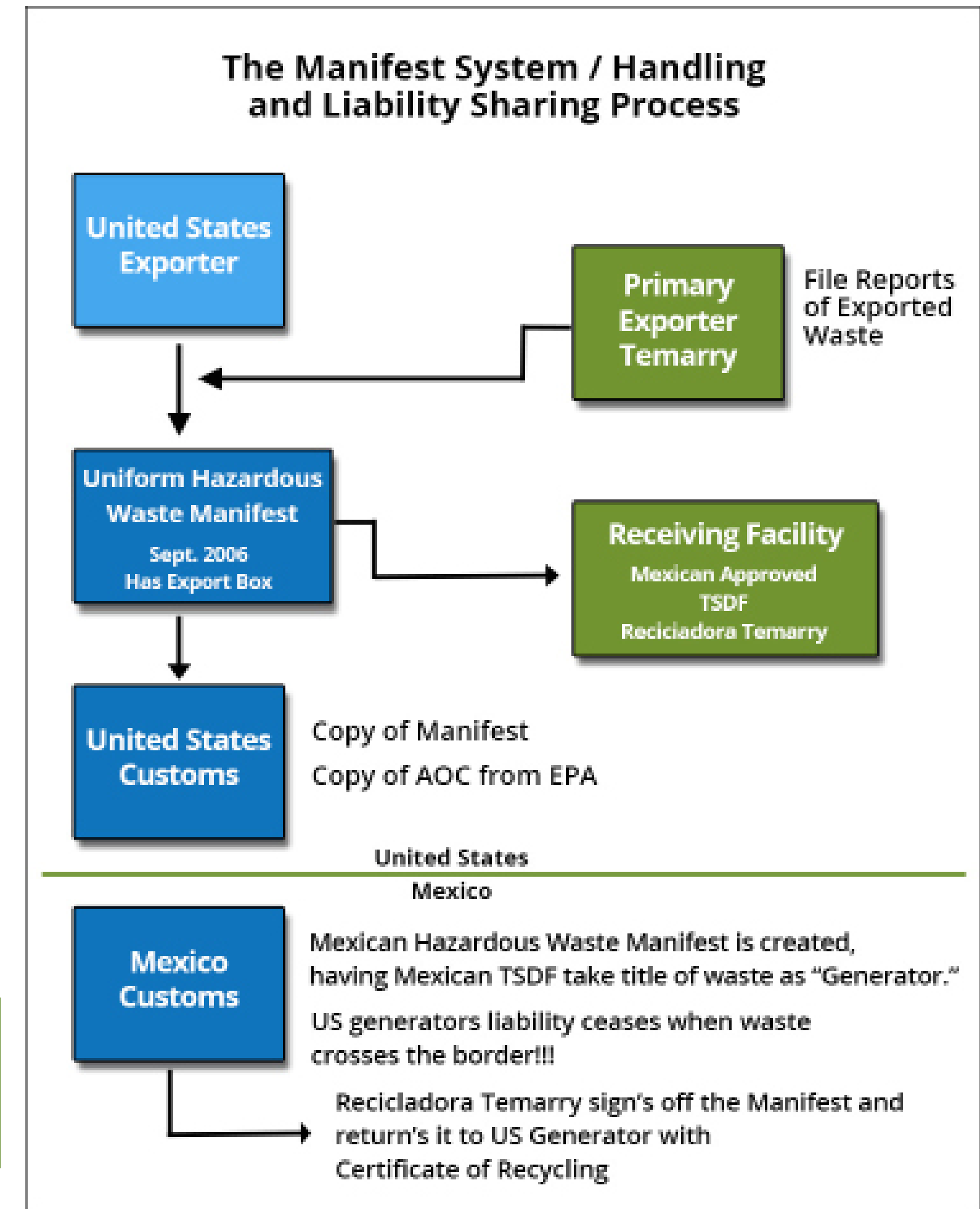


# GENERATORS THAT EXPORT TO TEMARRY

Over 1000 waste generators served through 8 service companies including:

U.S Fish and Game  
DRMO — U.S. Military  
State of California  
Numerous School Districts  
Abbott Cardiovascular Systems  
Tesla Motors  
Sherwin Williams Paint  
Jafra Cosmetics  
Robertson's Industries  
Hayden Industrial Products  
Urethane Polymers International  
Para Tech Coatings  
Bachem Americas

Please contact our Corporate Office for particular reference contacts.



Let us show you a  
more cost effective  
solution for your  
disposal needs!

CONTACT US TODAY



We Have The Right Recycling Solution For You!

**TEMARRY RECYCLING**

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