

SECTION 11

PART B CERTIFICATION

MIXED WASTE FACILITY
RCRA/TSCA PERMIT APPLICATION

PERMA-FIX NORTHWEST RICHLAND, INC.

RICHLAND, WASHINGTON

Mixed Waste Facility

11.0 PART B CERTIFICATION

CERTIFICATION OF FINAL FACILITY PERMIT APPLICATION

The following certification statements fulfill the requirements of the Washington Hazardous Waste Management Act (WHWMA), in accordance with WAC 173-303-810(13)(a) and the Toxic Substances Control Act (TSCA), in accordance with 40 CFR 761.3, for Perma-Fix Northwest Richland, Inc.'s (PFNW) Part B permit renewal application dated April 8, 2009.

WHWMA CERTIFICATION

[WAC 173-303-810(13)(a)]

"I certify under penalty of law that this document and all attachments were prepared under my direction of supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations."

PERMA-FIX NORTHWEST RICHLAND, INC.

Richard Grondin, Vice President and General Manager

Date

Mixed Waste Facility

TSCA CERTIFICATION

[40 CFR 761.3]

“Under the civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.”

PERMA-FIX NORTHWEST RICHLAND, INC.

Richard Grondin, Vice President and General Manager

Date

Mixed Waste Facility

Certification of Compliance with PCB Storage Standards

Including Qualifications of Principals and Key Employees

Required for Approval of Commercial Storers of PCB Waste

[40 CFR 761.65(d)]

3.....*This information should include, but is not limited to:*

3(i) The identification of the owner and the operator of the facility, including all general partners of a partnership, any limited partner of a partnership, any stockholder of a corporation or any participant in any other type of business organization or entity who owns or controls, directly or indirectly, more than 5 percent of each partnership, corporation, or other business organization and all officials of the facility who have direct management responsibility for the facility.

Perma-Fix Northwest Richland, Inc. is a wholly-owned subsidiary of Perma-Fix Environmental Services, Inc. (PESI). PESI is a publicly held company. PESI stocks are bought and sold on NSDAQ. The major stockholders holding more than 5% of the PESI shares as of the end of 2008 are:

Rutabaga Capital Management, LLC,
Heartland Advisors, Inc., and
CONUS Partners, Inc.

3(ii) The identification of the person responsible for the overall operations of the facility (i.e., a plant manager, superintendent, or a person of similar responsibility) and the supervisory employees who are or will be responsible for the operation of the facility.

Richard Grondin, Vice President/General Manager
Zane Turner, Plant Operations Manager
Curt Cannon, Environmental Health Safety and Quality (EHS&Q) Manager/Radiation Safety Officer (RSO)

3(iii) Information concerning the technical qualifications and experience of the persons responsible for the overall operation of the facility and the employees responsible for handling PCB waste or other wastes.

Resumes for the following personnel are attached at the end of this section.

Richard Grondin, Vice President/General Manager
Zane Turner, Plant Operations Manager
Curt Cannon, EHS&Q Manager/RSO

3(iv) Information concerning any past State or Federal environmental violations involving the same business or another business with which the principals or supervisory employees were affiliated directly that occurred within 5 years preceding the date of submission and which relate directly to violations that resulted in either a civil penalty (irrespective of whether the matter was disposed of by an adjudication or by a without prejudice settlement) or judgment of conviction whether entered after trial or a plea, either of guilt or nolo contendere or civil injunctive relief and involved storage, disposal, transport, or other waste handling activities.

Penalty associated with Consent Agreement and Final Order Docket # RCRA-10-2008-0161.

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3(v) A list of all companies currently owned or operated in the past by the principals or key employees identified in paragraphs (d)(3)(i) and (d)(3)(ii) of this section that are or were directly or indirectly involved with waste handling activities.

Individual	Previous Company	Relationship
Richard Grondin	Perma-Fix Environmental Services, Inc.	Vice President Technical Services, Waste Management Nuclear Division
Zane Turner	Pacific EcoSolutions, LLC (transferred to PESI in 2007)	Plant Operations Manager
Curt Cannon	Pacific EcoSolutions, LLC (transferred to PESI in 2007)	EHS&Q Manager / RSO

3(vi) The owner's or operator's estimate of maximum PCB waste quantity to be handled at the facility.

120 Tons/year

Mixed Waste Facility

3(vii) A written statement certifying compliance with paragraph (b) or (c) of this section and containing a certification as defined in §761.3.

Certification of Compliance With Standards for Commercial Storage of PCB Wastes

I certify that the facility is in compliance with the storage facility standards for PCBs in paragraphs (b) and (c) of 40 CFR §761.65. Under the civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

PERMA-FIX NORTHWEST RICHLAND, INC.

Richard Grondin, Vice President and General Manager

Date

Mixed Waste Facility

3(viii) A written closure plan for the facility, as described in paragraph (e) of this section.

Provided as Section 9.

3(ix) The current closure cost estimate for the facility, as described in paragraph (f) of this section.

Provided in Section 9.

3(x) A demonstration of financial responsibility to close the facility, as described in paragraph (g) of this section.

Provided in Section 9.

Mixed Waste Facility

Attachment 11-1

Resumes of Key Employees Responsible for Handling of PCBs

RICHARD GRONDIN

Vice President General Manager, Perma-Fix Northwest Richland, Inc.

Qualifications Summary

Mr. Grondin has more than 25 years experience in the highly specialized radioactive/hazardous waste management industry with the majority of that experience concentrated on managing start-up waste management processing and disposal facilities for four different organizations: Perma-Fix Environmental Services, Inc., ATG Inc., Waste Control Specialists, Rollins Environmental and Stablex Inc. of Canada. His management responsibilities for these facilities included: developing new waste processing systems; streamlining or improving existing processes for better VR factors; interfacing with EPA and other regulatory agencies for obtaining and maintaining permits and licenses; project management; helping on technical support for regulatory modifications; managing personnel, schedules and budgets. Recognized in the United States and Canada as an authority in hazardous and mixed waste treatment, he was involved in the treatment of several hundred thousand tons of waste in the last 25 years.

Chronological Experience

Vice President/General Manager

Perma-Fix Northwest Richland, Inc, Richland Washington – June 2007 - Present

Directs the operations of the Mixed Waste and Low Level Waste Facility. Responsible for P & L.

Achievements: No lost time accident in the last 2 years. Disposal of the Mixed waste Legacy in less than 90 day. Implementation of PM program. Upgrade of the BPU off gas system.

Vice President Technical Services, Waste Management Nuclear Division

Perma-Fix Environmental Services, Inc, Richland Washington – January 2002 – June 2007

Directs and support all technical aspect of the business, including Sales support, Treatment, Waste Acceptance and RCRA, Technology development, TSCA and Radioactive compliance with Permits and Licenses for Mixed Waste.

Achievements: Developed process to treat high Mercury waste, including Chemistry and regulatory aspect.
Developed technology to treat Pyrophoric Radioactive Waste.
Help to secure several million dollars of business from Hanford, Los Alamos and Rocky Flats.

Vice President / Mixed Waste Operations

Allied Technology Group, Inc., Richland, Washington – January 2000 – January 2002

Directs the startup and operations of the Mixed Waste Facility, including Vitrification and non-thermal processes. Responsibilities include: RCRA, TSCA and Radioactive compliance, Health, Safety and Training, radiation control, built core technical team and business development. Oversees daily operations and special project management. Responsible for P & L.

Achievements: Startup of first Commercial Mixed Waste Vitrification Unit in the country, Oversee Treatment and Disposal of almost 1,000,000 lbs of waste from Hanford by Macroencapsulation, Neutralization, Stabilization and Disposal of highly contaminated Acids with Pu (> 90 nCi/g) from Rocky Flats.

Vice President of Operations / Facility Manager

Waste Control Specialists LLC – Andrews, Texas – 1997 to 1999

Directs the operations of WCS' 1338 acre broad-base waste Treatment, Storage and Disposal facility in Andrews, Texas. Tasks include planning, organizing, administering and coordinating all functions to ensure compliance with all corporate regulatory, environmental and safe business practices and policies, all Federal, State, and local environmental laws and regulations. Key responsibilities include developing, revising and interpreting administrative and regulatory objectives, procedures, policies and rules; overseeing production, health and safety, compliance, laboratory, customer services and radiological division.

Achievements: Built very strong management team, successfully treated and disposed of 100,000 ft³ of Radioactive K061 waste (Cs-137), Lead the winning team of Broad Spectrum contract from DOE/Bechtel-Jacobs, Processed highly reactive Mixed waste From Los Alamos, Developed costing model for proposal.

Technical Manager / Director of Operations

Rollins Environmental Services, Deer Trail, Colorado – 1992-1997

Responsible for managing all operations for the 40-person startup facility, which included production, laboratory, wastewater plant and groundwater monitoring program. Designed and developed new processes. Managed renewal permits required by RCRA and regulatory agencies such as EPA and CDPHE. Member of the team for a LLW application permit for the facility. Also acted as project manager for key projects completed by Rollins.

Achievements: Reduced the annual treatment cost by \$5,000,000, Negotiated new CDPS permit with CDPHE, Reduced the cost of the Ground Water monitoring program by \$50,000, Developed and implemented new treatment for the wastewater plant, Managed and negotiated the treatment of 40,000 drums of waste contaminated with Dioxins and Furans, Completed the treatment in 4 months.

Technical Supervisor / Project Supervisor

Stablex Canada Inc., Blainville, Quebec, Canada – 1983 – 1992

Supervised operations of a mobile unit and remediation for treatment of hazardous, inorganic and RCRA wastes. Responsible for technical aspect of production. Designed and developed new treatment process for cyanide waste.

Education

Business Management Certificate, Hautes Etudes Commerciales, Montreal, Canada, 1987

Analytical Chemistry, Ahuntsic College, Montreal, Canada, 1983

Human Geography Certificate, Montreal University, Montreal, Canada, 1979

General Sciences, Amiante Region College, Canada, 1977

Training / Certification

Occupational and Environmental Radiation Protection, Harvard School of Public Health

Radiation Worker I and II

Packaging, Transportation, and Disposal of Radioactive Waste, in compliance with NRC Part 71

40-Hour OSHA Training in compliance with 29 CFR 1910.120

Technician Level Emergency Response Training, in compliance with 29 CFR 1910.120(q)

Incident Command Emergency Response Training, in compliance with 29 CFR 120(q)(6)(v)

Management of Polychlorinated Biphenyls, ETMD

Associations

Member of the American Nuclear Society (ANS)

Papers

Treatment of Uranium and Thorium chips at the DOE Sites, Dr. Juan J. Ferrada, Oak Ridge National Laboratory, Greg Hulet, Idaho Engineering and Environmental Laboratory, Richard Grondin, Perma-Fix Environmental Services Inc., Presented at the American Institute of Chemicals Engineers Conference in April 2003.

Industrial-scale Processes for Stabilizing Radioactively Contaminated Mercury Wastes, T.E. Broderick, P.E. Senior Research Engineer ADA Technologies, Inc., Richard Grondin, Vice-President Perma-Fix Environmental Services Inc., Presented at the Waste Management Conference in Tucson, AZ in February 2003.

Premier Technology Application of Vacuum-Assisted Thermal Desorption for the Treatment of Radioactive PCBs, S.G. Douglas, Compliance Manager M&EC, Richard Grondin, Vice-President Perma-Fix Environmental Services, Inc., Presented at the Waste Management Conference in Tucson, AZ in March 2005.

Treatment of Potentially Radioactive Metal Chips and Turning, Ben Crocker, Richard Grondin, Tom Yarbrough, Perma-Fix Environmental Services Inc., Presented at the 10th International Conference on Environmental Remediation and Radioactive Waste Management in Glasgow, Scotland in September 2005.

First Technology Application of Vacuum-Assisted Thermal Desorption for the Treatment of Radioactive PCB Contaminated Waste in the USA, Steve Douglas, Richard Grondin, Tom Yarbrough, Perma-Fix Environmental Services Inc., Presented at the 10th International Conference on Environmental Remediation and Radioactive Waste Management in Glasgow, Scotland in September 2005.

Zane C. Turner
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West Richland, WA 99353
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Professional Summary

I am a professional with over 10 years of Operations Management experience, the past 8 years directly managing a RCRA-regulated Treatment facility (TSD) unit handling over 2,500 cubic meters of waste per year. My job duties have included: waste processing/packaging of LLRW, MLLW and TRU wastes, laboratory sampling/analysis, shipping/receiving, regulatory analysis, procurement and cost control.

Education

June 1990	BSBA: Management Science	Central Washington University
June 1989	AA: Business Administration	Columbia Basin Community College
June 1984	General Diploma	Richland High School

Computer Experience

- Primavera (P3) 3.0 – Project Planning Software
- MS Project 4.0, 98 and 2003 – Project Management Software
- MS Windows 98, 2000, ME and XP – Operating Systems
- MS Word 2003 – Word-processing Software
- MS Excel 2003 – Spreadsheet / Financial Software
- MS Access 2003 – Database Development Software

Training

- Certified Hanford Site Waste Designator (Expired)
- Chem-Nuclear Site Criteria for LL Radioactive Waste Disposal – Barnwell, SC
- U.S. Ecology Site Criteria for LL Radioactive Waste Disposal – Richland, WA
- DOT Packaging/Shipping of Low Level Radioactive waste – Certified Shipper (Current)
- 40 Hour Hazardous Materials Worker (Current)
- 8 Hour Hazardous Materials Supervisor (Expired)
- McCoy and Associates, RCRA Workshop
- Certified Asbestos Worker (Expired)

Experience

Plant Operations Manager

6/07– Present Perma-Fix Northwest, Richland

9/03 – 6/07 Pacific EcoSolutions, LLC. (purchased by Perma-Fix Northwest, Richland)

6/01 – 9/03 Allied Technology Group, Inc. (purchased by Pacific EcoSolutions, LLC.)

- Directly responsible for and the management of a RCRA-permitted mixed waste treatment facility and a low-level radioactive waste processing facility with 40 employees and an annual budget of over 6 million dollars.
- Responsible for the all waste management activities within the operation to include: Thermal waste processing units utilizing Thermal Desorption and Plasma Gasification to treat organic mixed wastes to meet RCRA land disposal requirements. Also includes Non-Thermal processes such as Stabilization, Neutralization, Macroencapsulation, Microencapsulation and Chemical Reduction.
- Experience directly managing projects having wastes contaminated with Transuranic isotopes in excess of 100 nCi/gram and mixed fission products with greater than 10 Rem per hour dose rates.
- Oversee Laboratory personnel performing sampling and analysis activities for waste designation and Land Disposal Restrictions (LDR) determination.
- Direct interface with EPA/WDOE and WDOH pertaining to our RCRA permit and facility Radioactive Material License.
- Develop and implement new production/processing lines including all flow path designs and equipment procurement.
- Develop all Operational work plans for wastes requiring specialized processing.
- Develop, review and approve all facility Procedures.
- Monitoring of Financial Performance while providing business management, program support, analysis, problem solving and guidance to management.

Operations Specialist

9/00 – 6/01 Fluor Hanford, Inc.

- Assist Mixed Waste Treatment Project Manager in the preparation and coordination of all waste shipments to and from the RCRA permitted Treatment facilities.
- Prepare all waste tracking documentation.
- Assist with Fiscal Year performance reporting to the Department of Energy.
- Assist in the development of Fiscal Year Performance Incentives.
- Act as Point of Contact in the absence of the Project Manager.

- Coordinate all project activities with Operations, Transportation and Packaging, Radiation Protection, Quality Assurance and Technical Operations organizations.

Project Cost Analyst

11/99 – 9/00 Fluor Hanford, Inc.

12/98 – 11/99 Waste Management Hanford, Inc.

- Monitoring of Financial Performance while providing business management, program support, analysis, problem solving and guidance to management.
- Performed Team Lead duties providing direction and leadership to the project controls group.
- Provide monthly cost/schedule status with assigned facility management team.
- Develop Basis of Estimates for annual budgets.
- Track and Analyze monthly performance against the Budget Baseline.
- Provide early warning to management on overruns, underruns, technical and schedule issues.
- Central contact for the compilation and implementation of all Contract Requisitions.

Project/General Manager

4/97 – 10/98 TTI Control Technologies, Inc.

- Managed personnel in the design/manufacture of food processing plants and computer-controlled material handling systems.
- Oversight of all financial functions including Accounts Receivable/Payable and Payroll.
- Compiled Budget Status reports for corporate VP on projects totaling \$3 Million plus.
- Designed Database for control of over 3000 inventory items using MS Access.
- Setup and implement schedules for all projects using Microsoft Project 98.
- Plan and Schedule all transportation of equipment and installation crews to project sites.

Radioactive Waste Shipping/Receiving Supervisor

11/96– 4/97 Allied Technology Group, Inc.

- Oversight of the receipt, tracking, reporting and shipment of all customer and facility generated waste.
- Directed and trained personnel in the preparation of all incoming and outgoing radioactive shipments for compliance with DOT, WAC, facility licenses and appropriate LLRW disposal sites.
- Reviewed and approved all shipment documentation as well as positioning/bracing of material being shipped.
- Assisted in the revision and development of all facility safety and operational procedures, Radioactive and Hazardous waste classification program and site bar code tracking system.

Radioactive Waste Operations Supervisor

7/91– 11/96 Allied Technology Group, Inc.

- Oversight of the Decontamination, Volume Reduction, Material Tracking and Packaging of low-level radioactive material and waste within the operation.
- Evaluated all incoming materials for process determination including In-Barrel Compaction, Supercompaction and Decontamination.
- General Supervisor for three shift operations of up to 100 Production Technicians.
- Developed site Operational/Safety procedures and conducted training for periodic review and employee orientation.
- Assisted in the development of Departmental budget in excess of 2 million dollars.
- Performed cost/benefit analysis on potential processing systems.
- Assisted Plant Manager in the negotiation and structuring of all contractual agreements.
- Compiled all weekly and monthly production reports for corporate management.

CURT CANNON
Radiation Safety / Waste Management
1004 Angeline Blvd.
Benton City, WA 99320
(509) 588-6225

OBJECTIVE: Continue career in growth oriented company with progressive opportunities.

EDUCATION: Graduated Eastern Idaho Technical College
Radiological Safety – Applied Science Certificate
Currently working on BS Degree in Nuclear Technology. ~ 6 credit hours remain

**CONTINUED COURSES
AND CERTIFICATES:** National Registry of Radiation Protection Technologists (NRRPT)
40 Hour OSHA Hazmat (29 CFR 1910.120) including 8 Hour Supervisor
Packaging and Transportation of Radioactive Waste (DOT 49 CFR)
Radiation Safety Officer Training (Nevada Technical Associates)
NASP Safety Manager/Trainer

WORK EXPERIENCE: • **Commercial Radioactive Waste Management / Reduction** •
Manager Environmental Health Safety and Quality (EHS&Q)
Radiation Safety Officer (RSO)
(1992 – Present)

Involved in all aspects of radioactive licensing and air permitting with Washington Department of Health. Oversee all aspects of the Health Physics Department to include dosimetry, training, and environmental records. Set up release program for decontaminated metals to include a QA monitoring program and complete involvement in setting up and experimentation of new instruments and procedures. Oversee QA and training departments. Decommissioning and releasing of a Facility in Yakima, WA that included Hazardous and Radioactive (mixed) waste processing.

Radioactive Material licenses (2) and Radioactive emissions air permits (5) included the following facilities and/or processes

- Vitrification of low-level radioactive waste using natural gas and joule electric for thermal treatment
- Thermal bulk processing units (2) for low-level radioactive waste
- Respirator decontamination and recertification facility
- Low-level radioactive material non-thermal decontamination and volume reduction
- Mixed waste stabilization and macroencapsulation
- Plasma treatment of organic mixed waste
- Rotary thermal desorbtion
- Vitrification of mixed waste using plasma for thermal treatment

• **Department of Energy Facilities** •
Health Physics
(1987, 1990 – 1992)

Performed cost assessment surveys for DOE site clean up and building remediation. Health Physics coverage of remediation projects which included replacing mixed hazard waste drainpipe. QA surveillance of excess material and equipment for release to the public. Personnel survey, decontamination and documentation. Training lab personnel in use of proper radiological controls and survey techniques. Supplied all aspects of health physics support to on –site staff in accordance with DOE procedures.

• Commercial •
Health Physics
(1987 – 1990)

Provided health physics support during refueling and maintenance of boiling water and pressurized type reactors. Health physics coverage of generator chemical decon and generator maintenance, recirc pipe replacement, valve and snubber repair, insulation removal and replacement, underwater welding on upenders, fuel movement, removal and replacement of reactor head, cavity decon, metal decontamination, use of glove boxes, start up screen removal from turbines at a BWR and control point activities to monitor personnel and track doses received in containment. Remote air and radiation monitoring along with general radiation and contamination surveys.

EXTRA SKILLS / STUDY: Envirocare Users Seminar,
 Ascending Managerial Experience and Responsibility
 Experienced in interfacing with State and Federal agencies as well as customer QA
 Interviewing and Hiring Personnel
 Overseeing employee drug testing program
 Security of 45 acre waste processing facility
 Employee concerns coordination
 Low level radioactive waste compact involvement
 Disposal site rate regulation collaborative participant
 Air emissions and environmental reporting
 Research and development projects
 Treatability studies

REFERENCES AVAILABLE ON REQUEST