Finally! A cold or hot treatment product that works on all oils.

The EB-Series features the most advanced technology and produces quality oil faster while treating your water.

• Rejected loads are lost revenue •
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NORA, 7250 Heritage Village Plaza, Suite 201, Gainesville, Virginia 20155 Phone: 703-753-4277 Fax: 703-753-2445 Email: sparker@noranews.org Web: www.noranews.org
Plummer’s Environmental Services Inc.

1. How long has your company been in the industry and how did you get started?

Plummer’s Environmental Services has been in the industrial sector since 1987. The company’s longevity is due to the good work of its employees and the quality customer service provided. Plummer’s Environmental Services grew from the septic business eventually making the transition to branch into the industrial waste market.

2. What services do you provide? What products do you produce?

Plummer’s Environmental Services is a fully licensed CWT facility comprising wastewater treatment, oil recycling, and solidification and handling of solid wastes through a permit with the State of Michigan. We offer our customer’s multiple options of service ranging from bulk transportation in 13,000-gallon vacuum tankers to industrial vac and dry vac services, roll-off transportation, water jetting, and disposal of wastes among many others. Plummer’s Environmental Services treats industrial waters for discharge to the POTW and produces a solidified waste to transport to the landfill along with reclaiming oils for the fuels and re-refining markets.

3. Where does your company provide service?

Plummer’s Environmental Services provides customer service in the Michigan, Indiana, and Ohio markets. We are not afraid of geographic boundaries when it comes to performing work for our customers. We work with our customers to help and provide service to them wherever they need.

4. Why are you a member of NORA? How do you see NORA helping you build your business?

We feel that it is important to be good corporate stewards not only in the industry but also in the community and NORA is the type of organization that exemplifies this belief. This is why Plummer’s Environmental Services is a proud member of NORA. The organization provides us with the rare opportunity to debate industry trends and regulations with our peers and competitors in a venue that will really make a difference. In addition to the relationship building garnered at NORA events, we are provided the ability to meet suppliers and vendors who offer services and equipment that are both beneficial and relevant to our industry. NORA aids in the growth of our company by keeping us on the leading edge of industry trends and regulations and by allowing us the chance to build new business opportunities.

5. During your time in the industry, what changes over the past few years have impacted your business?

Plummer’s Environmental Services has weathered the changes thrown at us by the industry. We have been witness to the impact of the Used Oil market price changes, the growing presence of both the EPA and the State regulators, and the generator’s zero landfill policies. We have seen a sharpening of customer’s understanding of how their business operations have impacted their waste products. This awareness has allowed customers to change what they utilize in their process therefore changing the makeup of the waste. You couple this with the implementation of the CWT regulations and the whole industry seems to be tightening. The changes we have seen in the past few years are the beginning of the changes that we expect to see in the next 10 years.
TRUCKS THAT WORK! WITH SUSTAINABILITY IN MIND
A LEADING OEM OF BULK LIQUIDS TRANSPORTATION EQUIPMENT

WASTE OIL & VACUUM TANK SYSTEMS

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SINGLE OR MULTIPLE COMPARTMENT
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CANADIAN TC 406
NON-CODE TANKS

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NORA Member Heritage-Crystal Clean, LLC Acquires NORA Member FCC Environmental for $90 Million

On October 16, 2014, it was announced that NORA Member Heritage – Crystal Clean, LLC had acquired NORA Member FCC Environmental for total consideration of $90 million. Mr. Joseph Chalhoub, Founder, President, and Chief Executive Officer of Heritage-Crystal Clean, Inc. commented: “We are very pleased to be adding FCC Environmental’s personnel to our team and their assets to our organization. This acquisition will allow us to quickly improve the overall efficiency of our used oil collection fleet and to substantially expand the Environmental Services segment of our company.”

Superior Lubricants Company, Inc. Names Matthew Gudorf As President And Chief Managing Officer

On September 22, 2014, NORA Member Superior Lubricants Company, Inc. announced it had appointed Matthew D. Gudorf as President and Chief Managing Officer. Mr. Gudorf, a former executive of Safety-Kleen/Clean Harbors (NYSE: CLH), will apply his 23 years of automotive/industrial oil expertise to expand Superior Lubricants’ client base, improve its service mix, and introduce new efficiencies and services.

Elementary School Students In Canada Host Third Annual Oil Recycling Day

Students at St. Matthew School in Regina, SK, Canada hosted their 3rd Annual Oil Recycling Day on September 19, 2014. The students were set up from 8 a.m. to 3 p.m. to collect used oil, filters, and oil containers. Once collected, the items were driven to the Co-Op refinery to be recycled.

VTAE Update: Draft NORA Specification Being Developed

On the heels of approving a position paper promoting the use of VTAE (formerly referred to as asphalt flux, etc.), NORA continues its work on a proposed NORA specification for VTAE. Any company wanting to submit samples for the VTAE specification development project should contact NORA. Ongoing conference calls on this topic continue to be held.
2015 NORA ELECTED LEADERSHIP

2015 NORA EXECUTIVE COMMITTEE

President
Bill Hinton
Valicor Environmental Services, LLC

Executive Vice President
Chris Bergstrom
NOCO Energy Corp

Vice President
Roy Schumacher
Schumacher Consulting, LLC

Past President
Brandon Velek
Intergulf Corp.

2015 NORA BOARD OF DIRECTORS

Ellie Bruce
Heritage - Crystal Clean, LLC

Dan Cowart
Aaron Oil Company Inc.

Wayne Geisert
Plummer’s Environmental Services, Inc.

Todd Sheets
Par-Kan Company

Newly Elected
Re-Elected (Bold)

Jeff Cagle
Safety-Kleen, a Clean Harbors Company

Matt Gartner
XL Insurance

Rich Kalin
Noble Oil Services Inc.

Ted Sinclair

Jim Munnell
Emerald Services Inc

John Strickland
Vertex Energy Inc
**“Why is EPA again looking at the CWT Regulations? Will this affect NORA members?”**

In the September 14, 2014 Federal Register, EPA announced that it was going to continue an evaluation to determine if it should consider modifying the Centralized Waste Treatment (CWT) Effluent Limitation Guidelines (ELG). Based on this EPA notice and previous discussions with NORA (Scott Parker and Jack Waggener), the EPA’s primary issue is focused on the treatment of significantly contaminated Shale Gas Extraction (SGE) water by CWTs. This new development was discussed in a presentation I made at the 2014 NORA Conference in Puerto Rico; NORA submitted initial comments on this action to EPA on November 17, 2014.

EPA is concerned about CWTs possibly receiving significant volumes of SGE wastewater from the oil and gas industry. SGE water typically results from hydraulic fracturing (fracking) backflow water, produced water, spent drilling fluids, etc. EPA says it did not evaluate the treatment of SGE water in the original CWT-ELG (2000 & 2003). The volume of these contaminated waters has greatly increased resulting from high levels of fracking activities occurring in many parts of the USA. Each well can generate several millions of gallons of water in a short period of time.

The constituents in SGE waters depend on the oil and gas geological formation. Typically SGE waters have very high concentrations of Total Dissolved Solids (TDS) that can be over 100,000 mg/l, or 3 times more TDS than sea water. Another possible troublesome constituent is low levels of Naturally Occurring Radioactive Materials (NORM). As a general rule, these SGE waters have historically been handled at the well site through injection back down the drilled holes and treatment/recycling on-site. The more concentrated SGE water has often been disposed at commercial deep well injection facilities at a large cost; however, some of these waters have been sent to CWTs.

EPA has recently focused on the CWTs because there were a few instances where these high TDS waters have been handled and treated by CWTs, and then discharged to the local POTW or directly to a stream. The traditional physical and chemical treatment systems used by most CWTs do not remove much of the TDS. Some of these cases caused substantial environmental problems with the POTW operations and receiving streams; these events have been highly publicized. For example, this has happened in Pennsylvania, New York, and Ohio. The record shows that New York and EPA Regions I, II, and III have made a push to strongly regulate the treatment of SGE waters of CWTs.

A few NORA members are in the development of unique processes that may be able to remove the TDS to an acceptable level and cost for discharge to some POTWs or for reuse. One goal is to make it more economical than the high cost of disposal by deep well injection at commercial facilities. If this proves to be successful, a new market for NORA CWT members may be available.

In the NORA comments to EPA of November 17, 2014 it was stated that revising the CWT-ELG may not be necessary to address this limited issue. One initial NORA observation is that the limiting of TDS or any other constituent can be regulated by a POTW in its pretreatment ordinance. This is typically done to protect the POTW operations and discharge to surface waters. This is done on a case-by-case evaluation of each POTW that is based on several site specific variables (daily flow, size of receiving stream, POTW unit operations, etc.)

NORA believes that any new regulations and/or guidelines for CWT facilities could be aided by direct meetings between EPA and NORA’s experts in the field and the operators of CWT facilities. It has been NORA’s experience that stakeholder meetings with agencies facilitate greater consensus among participants, thereby reducing the risk and expense of unnecessary regulations and possible litigation.

In the coming months NORA will lead an effort to meet and work with EPA on this issue. At the 2015 NORA winter meeting in New Orleans, this subject will be addressed in the Wastewater Committee and others.

To contact Jack Waggener, P.E., email Jack.Waggener@urs.com.

Jack Waggener is a Professional Engineer and Senior Consultant to NORA.

If you have a question you would like Jack to address in the next issue, email sparker@noranews.org

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To contact Jack Waggener, P.E., email Jack.Waggener@urs.com.
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2ND ANNUAL NORA EH&S FORUM

When a company joins the association, they confirm their commitment to NORA’s Guiding Principles. The first principle is:

“We make health, safety, and environmental considerations a top priority in our planning for all existing and new facilities, processes, products, and services.”

To that end, the association will host its 2nd annual NORA Environmental, Health & Safety (EH&S) Forum on Wednesday, February 18, 2015 at The Roosevelt Hotel in New Orleans, Louisiana. If your role within your company significantly relates to EH&S issues, this forum is tailored just for you.

Topics that will be covered during the EH&S Forum include:

• How to Minimize Your Fleet Liability
• Legal Training for EH&S Professionals
• Media Training for EH&S Professionals
• Worker’s Comp Panel

Additional sessions will be added.

You may register for the EH&S Forum as a stand-alone event for just $149, or combine with the NORA Winter Meeting Registration and save $25. Register for the event with the enclosed registration form on page 16, or by visiting www.noranews.org.

For more information about the EH&S Forum visit www.noranews.org and click on the “Events” tab.
“There are very few folks on ‘our side,’ supporting us for the very beneficial work we do. NORA is and does. If you’re not involved, you’re not learning and, likely, not operating at your best. “

Mike Malatesta, Advanced Waste Services, Inc

“The world we live in is built upon relationships, and there is no better way to establish and develop meaningful relationships than to actively participate as a NORA member. “

Dr. Raoul Richardson, International Used Oil Research Institute
Over 175 industry leaders are expected to attend the 2015 NORA Winter Meeting held February 18-20, 2015 in New Orleans, Louisiana at The Roosevelt Hotel.

The NORA Winter Meeting is an excellent opportunity for NORA members to network and discuss news and issues related to the liquid recycling industry. This event is highly interactive and fosters the development of business opportunities and industry knowledge. Special interest groups help members explore the opportunities and threats facing different sectors of the business. Finally, the NORA Winter Meeting is a forum for members to have a say in the policies and positions of the association. View the tentative agenda on page 14.

Register for the event with the enclosed registration form on page 16, or by visiting www.noranews.org (under the “Events” tab).

All NORA members are also invited to sponsor this event and advertise in the 2015 Winter Meeting Book. For just a small contribution, you can promote your business and support the entire industry. See page 15.

You may purchase your sponsorship or advertising space by using the enclosed sponsorship form or by visiting www.noranews.org (under the “Sponsorships” tab).

Hotel rooms are available for NORA members at The Roosevelt Hotel New Orleans for a rate of $219/night. You may make reservations by calling 1 (800) WALDORF (mention code “ARR”). You may also make your reservations online by visiting www.noranews.org (under the “Events” tab). The cut off date for room reservations is January 26, 2015, but please be aware rooms may sell out earlier.

For more information, visit www.noranews.org and click on the “Events” tab, or contact Casey Parker at casey@noranews.org or (703) 753-4277.
### 2015 NORA WINTER MEETING AND EH&S FORUM AGENDA
**February 18-20, 2015 | New Orleans, Louisiana**

**TENTATIVE AGENDA - SUBJECT TO CHANGE**

#### WEDNESDAY, FEBRUARY 18

<table>
<thead>
<tr>
<th>Time</th>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>8:00 AM</td>
<td>Registration and Continental Breakfast</td>
</tr>
<tr>
<td>8:30 AM - 10:30 AM</td>
<td>EH&amp;S Sessions</td>
</tr>
<tr>
<td>10:30 AM - 11:00 AM</td>
<td>Break</td>
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<tr>
<td>11:00 AM - 12:00 PM</td>
<td>EH&amp;S Sessions</td>
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<tr>
<td>12:00 PM - 1:00 PM</td>
<td>Lunch</td>
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<tr>
<td>1:00 PM - 3:30 PM</td>
<td>EH&amp;S Sessions</td>
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#### WEDNESDAY, FEBRUARY 18

**NORA WINTER MEETING**

<table>
<thead>
<tr>
<th>Time</th>
<th>Activity</th>
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</thead>
<tbody>
<tr>
<td>4:00 PM - 5:15 PM</td>
<td>Board of Directors Meeting</td>
</tr>
<tr>
<td>4:30 PM - 6:00 PM</td>
<td>Registration</td>
</tr>
<tr>
<td>5:30 PM - 6:00 PM</td>
<td>New Member &amp; Board Member Reception</td>
</tr>
<tr>
<td>6:00 PM - 8:00 PM</td>
<td>Opening Reception</td>
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#### THURSDAY, FEBRUARY 19

<table>
<thead>
<tr>
<th>Time</th>
<th>Activity</th>
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<tbody>
<tr>
<td>7:30 AM - 9:00 AM</td>
<td>Registration/Check-In</td>
</tr>
<tr>
<td>7:30 AM - 7:15 PM</td>
<td>Display Tables Available for Premier Sponsors</td>
</tr>
<tr>
<td>8:00 AM</td>
<td>Continental Breakfast</td>
</tr>
<tr>
<td>8:00 AM - 8:20 AM</td>
<td>Pre-Meeting with Committee Chairs and Vice Chairs</td>
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<tr>
<td>8:30 AM - 9:00 AM</td>
<td>Welcome</td>
</tr>
<tr>
<td>9:00 AM - 9:40 AM</td>
<td>Wastewater Working Group</td>
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<tr>
<td>9:00 AM - 9:40 AM</td>
<td>Distilled Fuels Working Group</td>
</tr>
<tr>
<td>9:40 AM - 10:05 AM</td>
<td>Government Affairs Subcommittee on Research</td>
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<tr>
<td>10:05 AM - 10:45 AM</td>
<td>Break</td>
</tr>
<tr>
<td>10:45 AM - 11:45 AM</td>
<td>Filter/Absorbents Recycling Working Group</td>
</tr>
<tr>
<td>10:45 AM - 11:45 AM</td>
<td>Membership &amp; Marketing Committee</td>
</tr>
<tr>
<td>11:45 AM - 1:30 PM</td>
<td>Lunch with Speaker</td>
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<tr>
<td>1:30 PM - 2:20 PM</td>
<td>Re-Refining Council</td>
</tr>
<tr>
<td>1:30 PM - 2:20 PM</td>
<td>Parts Cleaning Council</td>
</tr>
<tr>
<td>2:20 PM - 3:00 PM</td>
<td>Antifreeze Working Group</td>
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<tr>
<td>2:20 PM - 3:00 PM</td>
<td>Conference Committee</td>
</tr>
<tr>
<td>3:00 PM - 3:40 PM</td>
<td>Break</td>
</tr>
<tr>
<td>3:40 PM - 5:40 PM</td>
<td>Used Oil Recycling Council/Government Affairs Committee</td>
</tr>
<tr>
<td>5:45 PM - 7:15 PM</td>
<td>NORA Happy Hour</td>
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</table>

#### FRIDAY, FEBRUARY 20

<table>
<thead>
<tr>
<th>Time</th>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>8:00 AM - 9:00 AM</td>
<td>Past Presidents Committee/Guiding Principles Committee</td>
</tr>
<tr>
<td>9:00 AM - 9:30 AM</td>
<td>Breakfast for Board &amp; Past Presidents</td>
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<tr>
<td>9:30 AM - 12:30 PM</td>
<td>Board of Directors Meeting</td>
</tr>
</tbody>
</table>
Gain exposure for your company at this premier event in the liquid recycling industry. All members, even those not attending the meeting, may sponsor and advertise. For just a small contribution, you can support your industry and promote your business. All sponsors will be thanked on the NORA website with a link to your company’s website, in Liquid Recycling magazine which is distributed to 2,000 industry leaders, and in the committee book which is distributed at the event and posted on the NORA website, and on signage at the event. Contact casey@noranews.org with any questions.

**Lanyard Sponsor**  *Only one available*  $1300
Your company logo will be printed on the lanyard handed to all attendees. Offered via lottery.

**Key Card Sponsor**  *Only one available*  $1300
Your company logo and message will be printed on all room key cards given to attendees staying at The Roosevelt New Orleans Hotel. Offered via lottery.

**Notebook Sponsor**  *Only one available*  $1200
Your logo will be on the notebook placed at each seat at the beginning of the Winter Meeting on Thursday, February 19. Offered via lottery.

**Audio/Visual Sponsor**  *Only one available*  $1000
Your logo will be prominently displayed when the ‘splash screen’ is displayed in the main meeting room. This sponsorship includes a free full page black and white ad in the committee book (a $390 value). Offered via lottery.

**Premier Sponsor**  $750
Premier sponsors have the opportunity to use a 6’ table near the NORA registration desk to display company information and literature for the duration of the meetings on Thursday, February 19 and are allowed up to 60 seconds to address the entire group at the beginning of the meeting on Thursday. Your company logo will be on the front cover of the committee book, and on a large sign inside the meeting room. This also includes a full page black and white ad printed in the committee book ($390 value). Please note that meeting space allows for materials to be displayed only on a 6’ table. Tables are assigned on a first-come first-served basis on the day of the event.

**Lunch Sponsor**  $700
Your company logo will be prominently displayed during lunch on Thursday, February 19. Your company logo will appear on all Winter Meeting agendas. You may address the entire group before lunch for up to 60 seconds. Only six available.

**Happy Hour Sponsor**  $625
Your company logo will be prominently displayed during happy hour on Thursday, February 19. Your company logo will be printed on each drink ticket. Your company will receive extra drink tickets for the event. Your company logo will appear on all Winter Meeting agendas.

**Charging Station Sponsor**  $525
Your company logo will be prominently displayed near a charging station near the NORA registration desk to supply power for mobile devices.

**EH&S Sponsor**  $500
Your company logo will be displayed on signage inside the EH&S Forum meeting room on Wednesday, February 18. Your company logo will appear on all the EH&S Forum schedules in the EH&S book. This also includes a half page black and white ad in the EH&S printed materials.

**Breakfast Sponsor**  $250
Your company logo will be displayed during breakfast on Thursday, February 19. Your company logo will appear on all Winter Meeting schedules.

**Candy Bowl Sponsor**  $175
Your company logo will be displayed next to the candy bowl at registration on Wednesday, February 18 and on Thursday, February 19.

**CONFERENCE BOOK ADVERTISING**

<table>
<thead>
<tr>
<th>Ad Category</th>
<th>Price</th>
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<tbody>
<tr>
<td>Back Cover Ad*</td>
<td>$1050</td>
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<tr>
<td>Inside Front Cover Ad*</td>
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<td>Inside Back Cover Ad*</td>
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<tr>
<td>Full Page Black and White Ad</td>
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<td>Half Page Color Ad</td>
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<td>Half Page Black and White Ad</td>
<td>$225</td>
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<tr>
<td>1/3 Page Horizontal Color Ad</td>
<td>$300</td>
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<tr>
<td>1/3 Page Horizontal Black &amp; White Ad</td>
<td>$200</td>
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<tr>
<td>Color Logo by Company Index</td>
<td>$150</td>
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*These items are offered via lottery. Email casey@noranews.org by January 5 to enter the lottery.*
Complete one form for each person. Payment info only needed on one form. Online registration available at www.noranews.org/?page=2015WMinfo. If registering online for EH&S Forum and the Winter Meeting, please use code WMCombo to receive the discounted pricing.

**Contact Info**

<table>
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<th>Name</th>
<th>Badge First Name</th>
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**Registration Choices**

**OPTIONS**

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2015 NORA ADVERTISING OPPORTUNITIES

2015 MEMBERSHIP DIRECTORY

The 2015 Membership Directory will be printed in early 2015 and mailed to over 1,000 contacts in NORA member companies. The directory is also available for purchase by non-members.

This publication, the most comprehensive directory in the liquid recycling industry, is a full-color professionally produced directory with detailed contact information for each member company and its personnel.

LIQUID RECYCLING MAGAZINE

Liquid Recycling, NORA’s official magazine, is a full-color publication printed four times a year. This magazine is the only publication being mailed to all known companies - over 2,000 industry leaders - in every sector of the liquid recycling industry.

2015 Magazine Topics

Issue 1: “Industrial Diversification”
Issue 2: “Focus on Antifreeze”
Issue 3: “Pre-Conference Issue”
Issue 4: “2016 Market Outlook”

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NORA's 2015 Advertising Kit is now available online for print and download.

This advertising kit includes ad dimensions, deadlines, and submission instructions. This kit contains all advertising opportunities with NORA, including those on www.findareycler.org. An order form is included for you to create an easy, customized advertising plan with volume discounts. This kit will assist you in preparing your 2015 advertising budget.

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“To be excellent in business requires knowledge and perspective beyond yourselves, your company and your own market. You need to see the bigger picture in order to anticipate and develop the right strategies for your own business, especially in the oil world where geopolitical events trigger changes throughout the oil industry. NORA helps you understand your market’s realities. Even if you own a company in one city, you are affected by regional, national and global trends. The more depth of understanding you have, the better equipped you will be to make better decisions. Secondly, NORA provides a place where you can learn from your peers. It’s like continuing education and invaluable for you. You can’t get that anywhere else for the used oil industry.”

Roy Schumacher, Schumacher Consulting LLC
The 2014 NORA Conference & Trade Show took place November 5-8, 2014 in Puerto Rico. Over 400 industry leaders were in attendance at the event that featured nearly 50 exhibitors and 16 educational sessions.

The next few pages capture some of the images from the networking event. Additional photos and presentations are now available online for NORA members at www.noranews.org.
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INTERNATIONAL TREATMENT CHEMICALS
Commander Kirk Lippold, USN (Ret.) Delivered Powerful Keynote Presentation at 2014 NORA Conference & Trade Show

Commander Kirk Lippold, USN (Ret.) gave the keynote address at the 2014 NORA Annual Conference and Trade Show.

Lippold was the Commanding Officer of the USS Cole when it came under a suicide terrorist attack by al Qaeda in the port of Aden, Yemen in October 2000. With this unique experience, Lippold addressed the audience with a presentation titled “Leadership and Accountability When It Matters.”
Government Affairs Executive Summary
Chris Harris, NORA General Counsel and Jack Waggener P.E., NORA Senior Consultant

Since its founding in 1984, NORA has always been involved in a wide range of government policy issues. At NORA’s 30th anniversary conference this session was dedicated to reviewing the status of more than a dozen ongoing issues that are likely to affect your business. These issues included the Non Hazardous Secondary Materials (NHSM) litigation affecting both on-spec and off-spec used oil, NORA’s NHSM petition to EPA, the aftermath of the California Used Oil Life Cycle Analysis, and the fight to overturn various states’ ban on the use of Vacuum Tower Asphalt Binder (aka Asphalt Flux) for paving. NORA General Counsel Chris Harris and Senior Consultant Jack Waggener were the presenters.

Optimizing the Performance of Hydrotreating and Filtration Systems
Peter Douvry and Donnita Mims, Porocel

Re-refineries range in size from complex, multi-million gal/yr production facilities to relatively simple skid-mounted filtration units. Most large scale plants use hydrotreating to produce high quality Group II and III base oils from used motor oil. Smaller operations typically utilize a filtration technology, usually activated bauxite (or “clay”)-based. At the heart of each of these processes are critical performance components that must be routinely replaced – catalyst and metal trap media in the case of hydrotreating; activated bauxite in filtration systems. The proper selection of these products and optimal use can have a huge impact on the performance and economics of the re-refinery.

Re-Refining Technologies
Francois de Toit, Catalyst Trading Company

The understanding of feedstock contaminants, feedstock preparation, operating/design features/parameters and how these can influence hydro-processing and catalyst systems when treating waste oils. Understanding catalyst systems and how these systems can deactivate and/or create pressure drops.

Is the Used Motor Oil Market Ready For Price Indexation?
Markus Wimmer, Argus Media

The market for used motor oil (UMO) has seen tremendous change over the past decade, largely based on evolving processing technology and a shift toward new value chains such as base oil re-refining. The pricing of UMO has not caught up with this development, and is still largely tied to No. 6 fuel oil and other price baskets that are oftentimes unrelated to the unique supply and demand balance for UMO. Particularly the buying and selling on unrelated price indexes exposes parties to undue risk and uncertainty. Argus proposes to create a pricing tool that identifies the unique value of used motor oil independent from its end usage to provide structure across its entire value chain.
Labs: How to reduce costs, get results, and limit liability
Opal Johnson, Laboratory Director, Summit Environmental Technologies

Ensure the link is not broken and your samples and associated results are viable from beginning to end in a streamlined and cost effective manner. Your data is only as strong as the weakest link. The chain of custody is your first line of defense. Learn how to make it an unbreakable chain.

Uh-Oh, It’s Hammered! - Managing Environmentally-Impacted Media in a Merger or Acquisition
Gary Risse, P.E., Trihydro Corporation

Letter of Intent, CHECK! Financing, CHECK! Environmental Due Diligence, Uh-Oh! The sale of your business, or the purchase of a strategic acquisition has just been complicated by discovery of environmentally-impacted media (soil, groundwater, surface water). Should it scuttle the deal? Should I clean it up? How big of a deal is it? Is it reportable? Who’s responsible? Should I call my attorney? This session focused on possible pitfalls resulting from invasive due diligence activities, ways to responsibly bracket potential legacy environmental cleanup costs, and how to keep them from stopping an otherwise attractive business deal. These concerns are real whether your firm is the acquirer, or the acquired, and both sides of the table have certain responsibilities.

Solving Business Challenges with Best-in-Class Technology Deployment
Sherri McDaniel, President of ATEK Access Technologies, LLC.

Have you ever been in a situation where you invested in new technology to improve your business and you didn’t get the results you expected? Many companies experience that frustration and missed opportunity. To avoid repeating this miss in the future, this workshop focused around best practices for the planning and deployment of new technology in the increasingly competitive waste oil market.

What is my Company Worth?
Bert Rosica, A. E. Rosica & Co.

Just like the price of oil, the value of one’s business can fluctuate over time and can be affected by many factors. And just like the price of oil, understanding the value of your business, and the factors that affect it, can help when it comes to managing your business and making decisions that will be beneficial to enhancing your company’s value in the future.

Overview of Types of Acquisition Structures and Key Tax Considerations
Ed Schiff, Sheppard Mullin

Just like the price of oil, the value of one’s business can fluctuate over time and can be affected by many factors. And just like the price of oil, understanding the value of your business, and the factors that affect it, can help when it comes to managing your business and making decisions that will be beneficial to enhancing your company’s value in the future.

PCBs: Working With EPA to Fix the Problem
Steve Shimberg, SJSolutions PLLC

This session provided an update on NORA’s PCB/TSCA Reform Effort. It reviewed: the problems that led us to launch this effort; the solutions that we are proposing; the status of TSCA reform legislation; the progress we are making with EPA to develop administrative solutions; and the path forward to reach a successful conclusion.
Crisis or Hiccup? Current realities, and future dynamics, in the North American used oil industry
Ian Moncrieff, Kline & Company, Inc.

Major changes have taken place in the North American used oil value chain since the boom days of 2010/2011. Stagnant lubricants demand, heightened competition among used oil collectors, pricing tensions on UMO supply, and weakening virgin base oil production margins, have all contributed to tougher times for industry players downstream of generation. Recent events in world oil markets are adding a dimension of uncertainty. Are these changes signaling a new reality in used oil industry dynamics, or are they a blip on the radar screen? The likely future forces impacting the collection and resale of UMO, as well as on re-refining profitability, and the potential consequences and strategic options for the industry, were addressed.

Current Status of Vacuum Tower Asphalt Extender in North America
Tony Kriech, Heritage Research Group

Using the vacuum tower bottoms from rerefining engine oil has been practiced in North America for 30 years. Recently there has been published work by researchers that have raised concerns about these materials from a performance standpoint. Other studies have found no such concerns. This presentation reviewed all of these studies as well work by Heritage that discuss this complex issue.

An Update from the International Used Oil Research Institute
Dr. Raoul R. Richardson, International Used Oil Research Institute

The Institute has always maintained an aggressive environmental perspective, as it pertains to our natural resources, our stewardship, and the issues impacting our global environmental challenges, to improve the protection of human health and the environment. The development of educational resources for the used oil recycling industry compels this type of collaborative effort. Industry/University partnerships represent a vital evolutionary component for research, which we anticipate will result in exciting new innovations. We are thrilled concerning the potential, as we strive together, merging theoretical classroom activities with real world field applications, and researching new technologies, while documenting our findings by third party scientific organizations to ensure oversight.

Exports and Imports of Used Oil
Chris Harris, NORA General Counsel

Does used oil need a passport? Used oil is definitely part of an international market. It flows into and out of the United States in significant quantities. There are certain regulations governing such exports and imports. Which agencies regulate these international shipments and transactions? What paperwork is required? Is your business in compliance? NORA General Counsel Chris Harris provided the answers.

Tire Pyrolysis provides a new business opportunity.
Ed Benizzi, Director of Marketing, PRTI, Inc.

The scrap tire industry can offer an opportunity for the used oil collectors, processors and fuel blenders. Tire pyrolysis, which is coming of age as a viable business opportunity, has the ability to provide an additional source of revenue for NORA members. It allows you to provide new service to your current and future customer base. PRTI, Inc., an environmental and energy company in Raleigh, North Carolina has the process and the technology to bring this opportunity to NORA members.
Over 80 NORA members had the opportunity to tour Olein Recovery Corporation during the 2014 conference in Puerto Rico.

Jorge Gonzalez-Camp, President and CEO, led the tour. The facility processes used oil into base oils, distillates, raw gasoil and asphalt flux. The facility also provides manufacturing, design and blending services.

NORA thanks Olein Recovery Corporation for their hospitality during the conference.
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Back in 1984, the Hazardous and Solid Waste Act was passed which included serious threats to the interests of the responsible used oil recycling companies. Primary among those threats was the potential that used oil would be listed as a hazardous waste.

A group of industry representatives met in Virginia and decided to form NORA as a trade association to strongly oppose listing used oil as a hazardous waste. The association was successful.

The association has grown from 4 companies in 1984 to over 400 today. Its mission remains the same: to defend the rights of NORA members to responsibly collect and recycle used oil and related materials.

Since its founding NORA and its member companies have been involved in all EPA rulemakings affecting used oil as well as various state and local policy issues. The next few pages highlight major NORA accomplishments.
Testimony before Congressional committees by NORA President John J. Nolan on the environmental benefits of classifying used oil as a valuable product rather than as a hazardous waste.

NORA drafted legislation at the request of Congressman Ike Skelton of Missouri. This bill, H.R. 1593, was introduced by Representative Skelton and was co-sponsored by 131 other Members of Congress. NORA members were very active in lobbying their representatives to sign on as co-sponsors. The widespread support for Congressman Skelton’s bill influenced EPA to adopt management standards for handling used oil without being designated as a hazardous waste.

NORA worked closely with EPA on the development of sensible used oil management standards (now codified at 40 CFR Part 279).

NORA intervened in litigation before the U.S Court of Appeals to prevent EPA from listing used oil as a hazardous waste. This litigation continued into the early 1990s.

On behalf of its solvent recycler members, NORA continued the exemption from onerous drum inspection requirements imposed by the U.S. Department of Transportation. This exemption is available to all NORA members.

NORA helped organize a coalition of other trade associations (NADA, API, AOCA, ILMA and others) to enact the “Service Station Dealers Amendment” to the Superfund law (CERCLA). This 1986 amendment to CERCLA exempts certain used oil generators from CERCLA liability for used oil if the generator complies with environmental regulations and provides a DIY used oil collection facility. For the past three decades NORA has consistently engaged in on-going efforts to expand DIY collection programs across the country.

**NORA 30 YEAR MEMBERSHIP GROWTH**

![Graph showing the growth of NORA membership from 1984 to 2014.](image_url)
NORA worked with EPA and submitted extensive comments on the second set of used oil management standards (finally promulgated Sept. 10, 1992).

NORA promoted re-refined lubricants as recycled products to be part of federal government’s procurement program under section 6002 of RCRA. See President Clinton’s Executive Order 12873, dated October 20, 1993 and President George Bush’s Executive Order No. 12780, dated October 31, 1991.

NORA participated in a successful effort to persuade New Jersey to rescind its hazardous waste designation for recycled used oil.

NORA persuaded EPA to adopt an important change to Part 279.74(b) (eliminating unworkable record keeping requirement of tracking shipments to ultimate burner when used oil recycler sells to a broker or other intermediary). See 63 Federal Register 24969 (May 6, 1998); 63 Federal Register 37782 (July 14, 1998).

NORA sponsored an independent professional assessment (“the Entropy Study”) of metals emissions from the combustion by a typical hot mix asphalt plant of used oil fuel compared to emissions from the combustion of virgin oil fuel.

NORA participated in rule making initiated by many states for the adoption of the used oil management standards. Several states proposed and adopted requirements that were different from and more stringent than the federal regulations (set forth at 40 CFR Part 279).

NORA adopted a Code of Ethics (Guiding Principles) for members of the used oil recycling industry and subsequently procedures for Adjudicating Complaints of Unethical Conduct.

NORA submitted extensive comments and a comprehensive data package to EPA and worked with the Agency for many years in a major project to develop sensible Centralized Wastewater Treatment (CWT) regulations that enhance CWT facilities’ ability to treat used oil/wastewater mixtures. After the CWT regulations were finalized (set forth in 40 CFR Part 437) NORA successfully worked with EPA, SBA, and OMB to improve and modify the effluent limitations.
NORA members persuade ASTM to adopt specifications for four categories of industrial oil fuels containing recycled oil (Grades RFO4, RFO5L, RFO5H, and RFO6). The ASTM specifications address viscosity; flash point; water and sediment content; pour point; density; ash content; sulfur content; extracted pH; and gross heating value. See Recycled Petroleum Products (Standard D 6448) developed by ASTM Subcommittee D02.P.

NORA members persuaded ASTM to adopt standard for recycled antifreeze. See Recycled Glycol Base Engine Coolant Concentrate for Automobile and Light-Duty Service (Standards D6471 and D6472) developed by ASTM Subcommittee D15.15.

NORA adopted a set of Best Management Practices for antifreeze generators that promotes recycling of used antifreeze.

NORA promoted the inclusion of re-refined lubricants as part of New York City's procurement program. Re-refined lubricants are also included in the procurement programs of the states of Maine, Vermont, and Massachusetts, King County, Washington and the U.S. Postal Service.

In a multi-year effort NORA successfully petitioned the Illinois Pollution Control Board (over vehement opposition of Illinois EPA) to eliminate manifests for shipments of used oil.

NORA worked with EPA to achieve a more realistic guidance document on the rebuttable presumption set forth in 40 CFR Part 279.

NORA worked with EPA over three years to improve the SPCC Technical Guidance Document.

NORA adopted a policy to prevent land disposal of oil filters and is engaged in an on-going effort to ban or discourage land disposal of oil filters.

NORA, relying in part on the Entropy study, refuted the “findings” of a flawed California-based study falsely alleging that burning of used oil results in substantial emissions into the air of heavy metals and other contaminants.

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NORA and its members engaged in a major coordinated effort to oppose the passage of S.B. 546 (California legislation designed to severely limit transfer of used oil to out of state recyclers). S.B. 546 was eventually enacted in a dramatically modified form that allowed out of state transfers.

NORA submitted two sets of comprehensive comments including laboratory data to EPA in opposition to EPA’s proposal (as part of the Non-Hazardous Secondary Material regulations) to effectively ban the burning of off-specification used oil fuel for energy recovery. NORA sued EPA in the D.C. Circuit Court of Appeals to block the application of the NHSM rule with respect to off-spec used oil. NORA’s comments apparently persuaded EPA to allow a comparison of coal to off-spec used oil that could effectively retain a market for off-spec used oil fuel. This led to the submission by NORA of a petition that EPA is likely to grant.

NORA submitted an amicus brief in the Castle Oil case in New York that helped persuade the court that blending on-spec used oil with virgin petroleum products was fully lawful and a standard industry practice.

NORA submitted comments in opposition to proposed California legislation (S.B. 916) to require production of and government mandate to procure of bio-based lubricants. The proposed legislation was rescinded.

NORA actively opposed legislation to rearrange California’s tax on petroleum lubricants in a way that would discourage recycling. The proposed legislation was defeated.

NORA has been a key stakeholder in a massive, multi-year Life Cycle Analysis study of used oil generation and recycling. NORA and its members engaged in a major coordinated effort to oppose the passage of S.B. 546 (California legislation designed to severely limit transfer of used oil to out of state recyclers). S.B. 546 was eventually enacted in a dramatically modified form that allowed out of state transfers.

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Allies presented evidence to demonstrate the value of used oil and the need to preserve market forces to promote and expand used oil recycling.

NORA launched a major project to modify EPA’s TSCA regulations governing PCBs to avoid draconian remediation costs when used oil recyclers comply with Best Management Practices. NORA adopted a set of Best Management Practices for handling/testing of used oil to prevent PCB contamination.

NORA initiated a major project to demonstrate that Vacuum Tower Asphalt Extender (VTAE) is a valuable component of asphalt for pavement and roofing materials. This project is designed to reverse prohibitions of VTAE in several states.

NORA launched an outreach effort to filter manufacturers and automobile manufacturers to improve recyclability of oil filters.

NORA is working with EPA Region 10 and the State of Washington to eliminate promotion of Clor-D-Tect kits as valid field test for PCBs.
In January, Kline & Company, a worldwide consulting and research firm serving the needs of organizations in the lubricants and base stocks industry, introduced its monthly Base Stock Margin Index, a characterization of recent cash margin contributions in the U.S. base oil market over the past 24 months.

The Index estimates cash margin contributions associated with U.S. Group II base stock production. It simulates EBITDA before the deduction of corporate SG&A expenses for typical VGO-based virgin base stock plants and RFO-based re-refineries.

"Contract cash margins for both virgin base oil producers and re-refiners improved in October as feedstock prices continued to fall faster than postings. VGO, the feedstock for virgin Group II refiners, dropped by 14% over the past month, while base oil postings fell by a lesser 8% on average from September through October," said Ian Moncrieff, who manages Kline’s price forecasting activities.

"As raw material costs continued their descent in October, the majority of base oil producers announced posting decreases during the first week of November. Generally, posting adjustments lag changes in feedstock prices by at least one month, often longer. Margins on spot trade, as well as lagged postings, are showing a downward cash margin trend. Since June 2014, Brent crude oil has collapsed from $110/Bbl to $80 as of today, VGO and refined products have followed suit. Base oil prices, both on contract business linked to postings and in the spot market, have also weakened, but by lesser amounts to-date. If the free fall in mainstream oil prices is finally halted by the end of 2014, we expect to see a slide in contract cash margins as the embedded lag in posting adjustments finally catches up with real time market conditions. Underlying fundamentals remain weak, as new capacity continues to come on line in Europe (SK-Repsol in Tarragona, and Shell-Hyundai Bank in Korea), and the end of the buying season is imminent."
For more information on the Kline Index please contact Ian Moncrieff, Director (Ian.Moncrieff@klinegroup.com) at (973)-615-3680 in Kline’s Energy Practice.

Kline is a worldwide consulting and research firm dedicated to providing the kind of insight and knowledge that helps companies find a clear path to success. The firm has served the management consulting and market research needs of organizations in the chemicals, materials, energy, life sciences, and consumer products industries for over 50 years. For more information, visit www.Klinegroup.com.

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How is your company connected to the industry?

It may seem like SmartBin’s relationship with the Liquid Recycling industry has been brief, since starting operations in 2010, but in truth it began long before then. Right from its conception over 10 years ago, SmartBin has developed with a deliberate intent to transform the way waste liquid is collected. In doing so we wanted to ensure that the collectors who embraced technological advancements are rewarded not only with significant operational savings but also with recognition for high safety standards, innovation, environmental stewardship and customer service. Over the past 4 years we are proud to have become part of the NORA family, enjoying excellent relationships with many friends and clients alike.

What products/services does SmartBin provide to the industry?

We provide a remote tank monitoring solution using the latest sensor technology and direct routing software that enables collectors of waste oil & water to significantly reduce their collection costs and eliminate emergency spills and call-ins. The SmartBin UBi sensor fits easily to any tank and immediately starts reporting its fill-level (and much more) to the SmartBin platform. Using SmartBin, our clients and their customers know exactly how full each tank is, receive threshold alerts and drivers are sent “optimized routes” to their smartphone, tablet or existing fleet management software. The end result is happy customers, stress free Fleet Managers, and routes that cost far less in fuel and driver hours to service.

“NORA membership not only reinforces our commitment to improve waste oil collection in North America, it also provides a common ground with which to network and begin relationships throughout the industry.”
What value do you find in NORA Membership?

NORA membership not only reinforces our commitment to improve waste oil collection in North America, it also provides a common ground with which to network and begin relationships throughout the industry. The numerous events provide an opportunity to meet, catch-up with and ultimately demonstrate the innovation of SmartBin’s solution face to face with fellow members. We are always impressed by the educational resources and hands on approach of the NORA team and foresee a long and rewarding relationship ahead.

What other ways does NORA membership help SmartBin expand business opportunities?

We find that the NORA Membership Directory not only provides us with helpful market information but also the contact details which we use to communicate the benefits of SmartBin’s solution to members. Most members will have received an informative email from SmartBin or even an UBi sensor stress-ball in the mail! The detailed directory ensures we market only to members who can benefit from our solution, never spamming or contacting members that don’t collect waste oil or water.

How have products/services like SmartBin’s impacted and changed the industry in the past few years?

The industry has evolved greatly over the past few years without ever relinquishing its heritage or traditions. Collectors remain as customer, employee and community focused as ever which can be rare these days. What smart technologies such as SmartBin’s have brought to the industry is the tools to become more sustainable, agile and efficient while improving customer satisfaction.

It is the collectors that are leveraging technology to improve performance and reduce costs that are securing the future of their business and the loyalty of their clients.
In 1968 Gary Risse was so young that he has only vague memories of the day his father, Pete, brought a new three-quarter ton truck home. It was May 21, 1968.

My dad bought it for $2,600 at the Hub Ford dealership on Peach Tree Road in Atlanta, GA., Risse has been told.

Ford evidently did not want the truck to be misidentified so across the leading edge of the engine hood are large chrome letters spelling F O R D. A similar set of letters in white paint are spread across the tailgate.

This truck was – and is – a classic bare bones work truck. “It has no frills, three on the tree, no air conditioner and manual everything,” Risse says.

Because of the lack of power-assisted steering, Risse observes, “you have to have arms like Popeye to steer the truck.”

His father got what he wanted, basic transportation with no optional extras. The light blue pickup has a wide grille and headlight surround painted white. Both bumpers are also painted white as are the wheels.

Surprisingly there are two backup lights, probably because they are integrated into the taillight housing and were not extra.

Because a cigarette lighter and an automatic choke were extra cost items neither one is found on the truck. Risse finds that he often has to explain the function of the manual choke to younger drivers.

The very wide seat in the cab is equipped with two government mandated seat belts. The government also required in 1968 front and rear side marker lights.

A pair of unlikely accessories on the truck are the AM radio and white sidewalls on the 15-inch tires. The lug bolts on each wheel are protected by what Risse describes as “poverty hub caps.”

Risse recalls some of the most childhood fun that he and his sister, Terrie, had were on brief slow speed trips around their Georgia neighborhood riding in the six-foot bed of the truck. Another fond memory for Risse is when Saturdays were spent with his dad hauling stones home for later use in landscaping. He also learned how to drive on the truck.

In order to protect the truck bed Risse’s father constructed a wooden bed liner.

In addition to receiving careful cosmetic attention, the 4,200-pound truck also was carefully maintained mechanically and was never abused. The 240-cubic-inch, in-line six-cylinder engine regularly had the five-quarts of oil changed.

According to Risse the truck never was pressed into towing anything which undoubtedly boosted the longevity of the clutch and transmission. “It still runs like a top,” Risse reports.

With the exception of the upholstered bench seat, Risse says the interior of the cab is mostly steel.
or rubber. You can just hose it out if it gets dirty, he says.

With the primer beginning to show through the thinning paint after about 35 years of faithful service, Risse’s father was considering letting his Ford go. That is when, Risse says, “I refused to let him sell or give it away.”

It was about 10 years ago that Risse assumed ownership of the truck that seemingly had always been a part of the family.

He replaced a lot of the rubber parts and then, he says, I had it repainted in the original color.

Since the truck has always received excellent care and was garaged most of the time there was virtually no body work involved.

The odometer on the old Ford has currently recorded 112,000 miles and the pickup shows no signs of aging.

On the contrary, the spruced up vehicle is now considered a “cool truck.” So cool in fact, Risse says “My wife, Wendy, has had me teach her how to drive it.”

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### 16 NEW MEMBERS JOIN NORA SINCE LAST ISSUE OF LIQUID RECYCLING

<table>
<thead>
<tr>
<th>COMPANY</th>
<th>CONTACT</th>
<th>LOCATION</th>
<th>PHONE</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.E. Rosica &amp; Co</td>
<td>Bert Rosica</td>
<td>McLean, Virginia</td>
<td>(703) 405-6278</td>
</tr>
<tr>
<td>CleanTech Environmental Services Inc.</td>
<td>Don Vlasaty</td>
<td>Orland Park, Illinois</td>
<td>(248) 761-1470</td>
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<tr>
<td>Crane’s Waste Oil, Inc</td>
<td>Raymond Crane</td>
<td>Weldon, California</td>
<td>(800) 272-6330</td>
</tr>
<tr>
<td>Erpek Engineering &amp; Consulting</td>
<td>Enver Erpek</td>
<td>Ataşehir, Istanbul, Turkey</td>
<td>009 05333151782</td>
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<td>Fenix Process Technologies Pvt. Ltd</td>
<td>MV Rao</td>
<td>Pune, Maharashtra</td>
<td>+91 20-65008772</td>
</tr>
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<td>GARCO, Inc.</td>
<td>Greg Russell</td>
<td>Asheboro, North Carolina</td>
<td>(336) 683-0911</td>
</tr>
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<td>GTI</td>
<td>Stephen Gephart</td>
<td>Morris Township, New Jersey</td>
<td>(973) 630-0990</td>
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<tr>
<td>Kline &amp; Company, Inc</td>
<td>Ian Moncrieff</td>
<td>Parsippany, New Jersey</td>
<td>(973) 615-3680</td>
</tr>
<tr>
<td>Liquix Environmental Transportation</td>
<td>Joe Conroy</td>
<td>Carnegie, Pennsylvania</td>
<td>(412) 276-2011</td>
</tr>
<tr>
<td>LLL Transport, Inc</td>
<td>Gary Waller</td>
<td>Mission, Kansas</td>
<td>(913) 777-5401</td>
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<tr>
<td>Lub y Rec Mexico S.A. de C.V</td>
<td>Carola Garza</td>
<td>Huejotzingo, Puebla, Mexico</td>
<td>+52 2271025053</td>
</tr>
<tr>
<td>MasterWash Recycling Services</td>
<td>Gregg Hill</td>
<td>Denver, Colorado</td>
<td>(303) 292-2549</td>
</tr>
<tr>
<td>Oil Recovery Co. Inc.</td>
<td>Jonathan Jones</td>
<td>Mobile, Alabama</td>
<td>(251) 690-9010</td>
</tr>
<tr>
<td>Phoenix Oil, Inc</td>
<td>Trey Bosard</td>
<td>Humble, Texas</td>
<td>(281) 446-5029</td>
</tr>
<tr>
<td>Precision Petroleum, Labs Inc</td>
<td>Daniel Zabihi</td>
<td>Houston, Texas</td>
<td>(713) 680-9425</td>
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<tr>
<td>Transcourt</td>
<td>Robert Pahanich</td>
<td>Oakville, Ontario, Canada</td>
<td>(905) 338-5546</td>
</tr>
</tbody>
</table>

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### INDUSTRY CALENDAR

**2015 NAPA Annual Meeting**
January 25-28, 2015 • Marco Island, FL
www.asphaltpavement.org

**2015 NORA Winter Meeting**
February 18-20, 2015 • New Orleans
www.noranews.org

**2015 NORA EH&S Forum**
February 18, 2015 • New Orleans
www.noranews.org

**2015 NORA Conference & Trade Show**
November 11-14, 2015 • Orlando, FL
www.noranews.org
NORA Supplier/Vendor Members in good standing as of 11/26/14. Companies in bold have an ad in this magazine. Companies with a $ are part of the NORA $ave program by offering discounts/value added services to NORA members. Contact NORA to learn more about the NORA $ave program.

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