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Member Spotlight: Valicor Environmental Services page 4

NORA MID-YEAR MEETING
June 27-29, 2016 | Boston, Massachusetts
See Pages 16 - 19
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Oil Prices Drop-Environmental Concerns Rise

The drop in oil prices over the last 18 months has dramatically reset the marketplace in which NORA members operate.

Members have been primarily concerned with managing the financial and customer relation effects the change in the market has created. As the value of our industry’s products has decreased, the need to reset the financial relationship with thousands of generators/suppliers has consumed immense time and energy.

A very real secondary impact has been caused by lower oil prices: new environmental concerns. As the trend from pay-for-oil to charge-for-oil has increased, the financial incentive for the generator community to properly collect and segregate used oil has been eliminated.

DIY Used Oil: A Diminishing Collection Network

Over the past few months, the NORA office has received calls by generators asking if they are required to accept Do-It-Yourself used oil.

Some generators, who generally now have to pay to have their used oil picked up, are less inclined to take used oil from the general public at no cost. NORA has informed the generator community that they are not required to accept DIY used oil; but it likely eliminates their ability to use the Service Station Dealers Exemption to protect them from Superfund Liability.

It is expected that most DIY drop off locations will continue to accept used oil; however it is reasonable to think many generators will stop providing this service as this has now become an expense. Where will that used oil end up? The likely answer is municipal drop off locations or it will be dumped.

There is evidence that drop offs at municipal locations have increased because of fewer DIY drop off locations available from the commercial sector. News stories have popped up of town and county governments seeking additional funds to manage their used oil collection programs because of increased volumes and increased collection costs.

Unknown is how many gallons will go uncollected because of fewer commercial DIY collection points. If the general public does not have convenient access to DIY drop off locations, then it is possible the number of gallons of used oil improperly dumped will grow.

Wastewater: Less Segregation, More Solidification

The incentive to properly segregate used oil from wastewater streams when possible has been greatly decreased because of lower oil prices. Consequently, it is anticipated there will be an increase in the amount of used oil found in the nation’s wastewater streams. This means that NORA members who process wastewater will be dealing with larger volumes of used oil as a percentage of the total gallons processed.

NORA’s Wastewater Committee has identified another expected outcome of increasing used oil volumes from wastewater operations combined with diminishing markets for off-spec used oil: more solidification. While solidification allows the material to be processed efficiently, it eliminates the ability for the material to be beneficially reused.

Outcome

During a recent press interview, I was asked if the drop in oil prices would cause our industry to stop collecting and recycling used oil. My answer: Absolutely not.

While market conditions have caused our industry to transition business models, it has not diminished our commitment to responsibly collect and process every gallon of used oil generated.

It is important that we as an industry identify the environmental consequences caused by dropping oil prices. This will be a major topic of conversation at the upcoming NORA Mid-Year Meeting in Boston. 📺
How long has your company been in the industry? What have been the major milestones in the growth of your business?

Since 1986, Valicor held a CWT discharge permit. Beginning in 1994, Valicor built a 20,000 sq. ft. facility in Sharonville, Ohio, north of Cincinnati, and we began processing much larger volumes of industrial aqueous waste streams. We doubled the size of the Sharonville facility in 1996 to accommodate our growth with inks, paints, graphite, adhesives and other non-oily wastewaters.

In 1998, we opened our Middletown, Ohio facility to handle the increase in oily wastewater, and in 1999, we opened a drum/container facility in Monroe, Ohio to process all types of non-hazardous waste in various containers, including pails to super sacks.

Valicor started a fluid management and purification company in 2000. This company completed most work at customer locations but also ran an oil purification process out of the Monroe, Ohio facility (Base Oil Program).

In 2004, Valicor merged with SRS, out of Michigan, to become a full service environmental/purification provider to manufacturing industries. This merger formed Valicor as it is today.

Valicor’s services expanded in 2006 into West Virginia with a small plant in Nitro, West Virginia. Business in this region grew dramatically, so in 2010, we moved to a 45,000 sq. ft. facility in Huntington, West Virginia.

In 2008, we started our oil program. Valicor’s oil program established storage on major rivers where industrial oils are placed and shipped via barge to the gulf and the 6 oil market. This program enables Valicor to have consistent outlets for bi-product (off-spec oil) coming off of our plants.

A new 25,000 sq. ft. CWT facility opened in Huntsville, Alabama in 2012. We also established the Recycled Petroleum Products (RPP) program where we bring in petroleum impacted waters, separate the petroleum product from the water, and re-sell the petroleum.
In 2013, we started our product destruction/soap programs. Valicor takes in soap containers, de-packages them, and recycles the product, plastic and cardboard. We also take in line-flush/tank rinsate that is diluted with soap, and then concentrate it to resell in the marketplace. The water is discharged at our CWT’s. The same year, we opened a new 50,000 sq. ft. CWT facility in St. Louis, Missouri where the product destruction/soaps program was also implemented.

In 2014, we opened a new 20,000 sq. ft. CWT facility in Kansas City, Missouri and established the fly ash program. Fly ash is taken in from power generators and mixed with solidification materials to take to a landfill.

Our Sharonville facility moved in 2015 and 2016 into a 50,000 sq. ft. facility in Middletown, Ohio to accommodate new growth and success with our oil program. We also doubled the capacity of the Middletown, Ohio water pre-treatment plant.

This year, Valicor outgrew the 50,000 sq. ft. Franklin, Ohio facility, and we moved all fly ash, container, and product destruction/soap business into a new 120,000 sq. ft. facility in Monroe, Ohio. We also expanded our fly ash program into the St. Louis, Missouri region.

Where does your company provide service?

Valicor primarily provides services throughout the Midwest and South, with multiple facilities in Ohio and a facility in West Virginia, Alabama, Missouri, and Kentucky.

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

Valicor is extremely active within the NORA. I just finished my tenure as President and our company had 3 NORA Presidents in the last 20 years.

Having influence within NORA has been critical to the success of Valicor. Major issues have occurred over the last 15 years, and NORA has represented the CWT Industry well with the CWT regulations, solid waste issues, and many others industry issues.

I like to think Valicor has been a leader in our industry, and we plan to continue leading and remain active in NORA.

Marketing our company within NORA is overwhelmingly beneficial to Valicor. I can easily say Valicor currently conducts business with dozens of NORA members, and several of these relationships were developed through NORA.
Beyond Orion Refining, Inc.
New Re-refinery in Cheyenne, Wyoming

Charles and Rita Martin of “Beyond Orion Refining, Inc” recently announced the beginning of construction on a new 40 million gallon capacity re-refinery to be located in Cheyenne, Wyoming. This refinery is sized to accommodate the used oil recycling needs of the entire front range of Colorado, Wyoming and Western Nebraska. They anticipate the first runs to be in November of 2016.

California LCA Report and Workshop

The Used Oil Life-Cycle Assessment (LCA) Project document, which was published in NORA’s Winter Meeting Event book is available online to members. On April 27, CalRecycle hosted a public workshop.

A webcast of the workshop will be available online for three months and can be found at CalRecycle’s Public Meeting Webcasts page: http://calrecycle.ca.gov/Broadcast/

NORA Member Coco Products
Now Certified by EcoLogo/UL Environment

Coco Products LLC announced certification and partnership with EcoLogo/UL Environment.

EcoLogo Certifications are voluntary, multi-attribute, life-cycle based environmental certifications that indicate a product has undergone rigorous scientific testing, exhaustive auditing, or both, to prove its compliance with stringent, third-party, environmental performance standards.

Coco Absorb is now the first and only absorbent recognized by the EcoLogo program. The product also has certifications from OMRI, NSF, USDA, and EPA recognition.

NexLube Stalled Oil Recycling Plant Back on at Port Tampa Bay

Construction of an oil recycling plant at Port Tampa Bay was suspended in 2013 when building costs escalated.

Now, NexLube Tampa LLC, which has invested $100 million in to the project, has announced it found a partner with NORA member Puraglobe Florida LLC, which is an offshoot of Germany-based Puralube Inc., to finance the remaining 40 percent of the work and operate the plant.

It is now expected to open in mid-2018 and employ 65-80 people. The plant will eventually be able to process 24 million gallons of used oil per year. It will include a 56,000 sq. foot blending and storage building, a 20,000 sq. foot office building, approximately 30 above-ground storage tanks ranging in size from 10,000 gallons to 900,000 gallons, piping and foundations for the processing unit.

The partners are now in a due diligence period and are expected to close on the joint venture by the end of May.

NORA Member Hydrodec Sells UK Operations and Appoints New CEO

Beginning in December of 2015, NORA member Hydrodec Group, plc. appointed Acting Chief Executive Chris Ellis to Chief Executive; and began a “strategic auction” of their UK Re-Refining operations. Due to the downturn in the global prices of the oil market, Hydrodec concluded it was in their best interests to dispose of the UK Operations to a buyer able to properly finance and develop the business in the near term.

The UK operations have been sold to Andrew Black, a non-Executive Director and substantial shareholder of the company. The Board believes that the divestment of the UK collections business, while retaining an economic interest in the UK lubricant oil re-refining project, addresses the significant downside risk currently posed to the Group by its UK Operations given current global oil prices. Hydrodec plans to focus on growing its “market leading” transformer oil technology and business within the $2 billion global transformer oil market.

NORA Member Liquid Environmental Acquires All American Grease Services Company

On February 1, 2016, NORA Member Liquid Environmental acquired privately held All American Grease Services Companies, a leading non-hazardous liquid waste company. All American, based in Kenner, Louisiana, is a strategic addition to Liquid...
Environmental Solutions' non-hazardous wastewater collection and disposal business. The acquisition adds five service branches and three wastewater treatment facilities to the Liquid Environmental network.

NORA Member Vertex Energy Looking to Pursue Bunker Fuels Market

Chairman and Chief Executive Officer of Vertex Energy, Benjamin P. Cowart told shareholders in a letter that the company is “looking to enter the bunker fuels market”.

In the letter, Cowart acknowledged the negative impact that the significant drop in crude oil and related prices had had on the business in 2015, and said he was expecting a difficult 2016 ahead.

One of several areas the company was now considering to improve its fortunes was the development of finished marine fuels, citing that the new Emissions Control Area fuel requirements fit well with their existing processing capabilities.

“Our vacuum gas oil (VGO) product can be sold into the marine fuel market at improved pricing relative to traditional VGO markets. We intend to aggressively pursue this market in 2016,” stated Cowart.

NORA Member Universal Lubricants Acquires NORA Member Metro Environmental

NORA member Universal Environmental Services, LLC, (“UES”) has acquired NORA member Metro Environmental Services, Inc. based in Sylacauga, Alabama. Metro Environmental is an environmental services company primarily focused on the collection, processing and marketing of used oil and used oil related services. Metro Environmental Services has been providing services to the Alabama and Georgia areas for over 23 years.

The Sylacauga, Alabama location and employees will form UES’s 21st terminal operation that will provide additional volume for UES’s used oil re-refinery in Peachtree City, Georgia. The staff, assets and service offerings will provide instantaneous efficiencies to their customers and their business organization. The UES family is excited to welcome the Metro team to the organization.

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What Wastewater Related Projects are Being Worked on by NORA?

There are two on-going NORA projects that are very important to the NORA members. They relate to EPA’s re-evaluation of the existing Centralized Waste Treatment Effluent Limitation Guideline (CWT-ELG) and the EPA Non Hazardous Solid Materials (NHSM) rule as it impacts off-specification used oil which is typically extracted from industrial waters by CWT’s. In both cases NORA is significantly involved in representing our industry before EPA.

CWT-ELG Re-evaluation by EPA

EPA is concerned about CWT’s receiving significantly contaminated wastewater from the oil and gas industry which is called Shale Gas Extraction (SGE) water. SGE water typically results from hydraulic fracturing (fracking) backflow water, produced water, spent drilling fluids, etc. The volume of these contaminated waters has greatly increased resulting from the high level of fracturing activities occurring in many parts of the USA. Each well can generate several million gallons of water.

Under the rules governing the development of ELGs, EPA is required to re-evaluate each industry ELG every two years to determine if there have been significant changes to the regulated industry that would justify possible modification to the ELG. CWT’s receiving SGE water has caused EPA to begin in 2014 to look harder at CWT’s and possible changes to the CWT-ELG. EPA has identified numerous facilities that they believe may handle these wastes in Arkansas, Colorado, Louisiana, North Dakota, New Mexico, Ohio, Oklahoma, Pennsylvania, Texas, West Virginia, Wyoming, and others. They expect to complete their evaluation and report by December 2016.

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. Examples of other troublesome constituents are Strontium and Naturally Occurring Radioactive Materials (NORM). As a general rule, these SGE waters have historically been handled on-site through injection back down the drilled holes and treatment/recycling on-site. Some is disposed by commercial deep well injection facilities; however, some of these waters have been sent to CWT’s.

In the past few years, EPA has focused on the CWT’s because there were a few instances where these high TDS waters have been handled and treated by CWT’s and discharged to the local POTW or directly to a stream. Some of these resulted in substantial environmental problems with the receiving streams; these events have been highly publicized. For
example, this has happened in Pennsylvania and Ohio.

**Off-Spec Used Oil and the NHSM Rule**

Since 2010, NORA has continued to work with EPA to get off-spec used oil to be determined a non-waste which allows it to continue to be combusted as a fuel for energy recovery. As a result of litigation on the NHSM rule its policy toward off-spec used oil has changed if contaminant levels are comparable to the traditional fuels of coal and fuel oils.

On November 12, 2013, NORA petitioned EPA for a non-waste determination of off-spec used oil and included analytical data generated by NORA member Summit Environmental Laboratories. NORA has continued to meet with EPA on this issue, and in March 2016 EPA asked NORA to provide more analytical testing that would allow them to make a final determination. They indicated that they wish to include the final off-spec used oil determination along with that for used railroad ties by the end of 2016.

During March and April NORA has been working hard to provide the EPA requested data. EPA requested that 25 samples be tested for numerous contaminants that would allow it to be compared to the traditional fuels. The samples have been secured from NORA members and submitted to Summit Labs for detailed analytical testing. The results of these tests are expected to be submitted to EPA in May 2016. This is a very important project; NORA will continue to meet with EPA to try to secure a favorable determination. This will preserve the market for off-spec used oil. Without a favorable ruling there will be unintended negative environmental consequences.
The third annual NORA Environmental, Health & Safety (EH&S) Forum held February 17, 2016 in San Antonio, educated over 50 NORA members on safety issues facing oil recycling companies.

NORA’S first Guiding Principle states that member companies make health, safety, and environmental considerations a top priority in planning for all existing and new facilities, processes, products and services. The EH&S Forum is designed to support and expand each company’s knowledge on EH&S topics.

This year, attendees discussed safety with regards to drug legalization, used oil logistics, protecting drivers with drive cam technology, the changing EH&S policies in the industry, and anticipating hidden hazards found on the work site. The Forum then wrapped up with a Q & A Roundtable discussion.

These presentations are available online exclusively to NORA Members at www.noranews.org. Visit the Member Only Resource Center and click “Past Event Resources”.

Mark Your Calendar: The fourth annual EH&S Forum will be held on Wednesday, February 22, 2017 at Caesar’s Palace in Las Vegas.

THANK YOU 2016 EH&S Sponsors
“Drug Legalization: Practical Effects for NORA Members”
Dennis Maisano, 901T Safety Education

“Hidden Hazards That Bite”
Gerry Luther, Caliche Ltd

“Used Oil Rail Logistics: An EH&S Perspective”
Patrick Brady, BNSF Railway

“Old School vs. New School: The Culture of Safety is Changing”
Amy Blyth & Gary Risse, Trihydro Corporation

*Please Note: For the Drive Cam Technology presentation, please contact Sonya Moore of Lytx at smoore@lytx.com or 817-823-4555

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From February 17-19, over 150 national and international leaders from the liquid recycling industry came together in San Antonio to discuss regulatory and business issues.

During this event, NORA committees and working groups met to discuss opportunities and threats for recyclers of used oil and related materials. In addition to committee meetings, attendees heard a presentation on the insight into the Oil Recycling Market and challenges with the Superfund liability.

The meeting minutes, photos, and other related materials are available for members by visiting the “Members Only Resource Center” on www.noranews.org.

Oil Recycling Market Insight

Dr. Scott, President of the Loren C. Scott & Associates, Inc, gave a presentation titled “Oil Recycling Market Insight” during lunch at the Winter Meeting. Dr. Scott discussed the current oil market, addressing the impact of low oil prices and the variety of responses from international oil companies, providing a snapshot of oil pricing trends, and offering his informed opinion on the future of oil.

Dr. Scott will also be speaking at NORA’s 2016 Annual Conference.

For those who missed the presentation, it is available to NORA members on www.noranews.org in the “Members Only Resource Center”.

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- Use the form on page 17
- Register online at www.noranews.org > Events
- Call the NORA office at (703) 753-4277

*There will be an added cost of $25 for attendees who register on-site at the event.*

**SPONSOR THE EVENT**
Many sponsorship and advertising opportunities are available for the 2016 Mid-Year Meeting. Starting at just $150 to place your logo in the event book, you can support your industry and promote your company. Visit www.noranews.org for more information or contact Casey Parker at casey@noranews.org. Page 18 has details and you can reserve your sponsorship on page 17.

**HOTEL INFORMATION**
NORA has secured a room block at the Hyatt Regency Boston hotel for $249 per night. Most attendees will arrive on Monday, June 27 and depart on Wednesday, June 29. To reserve your room, visit www.noranews.org > Events or call 1-888-421-1442 and ask for the NORA rate. More information and a direct link to the hotel website is available at www.noranews.org.

**TENTATIVE AGENDA**

| MONDAY, JUNE 27 | 3:45 PM - 5:00 PM | Board of Directors Meeting |
|                | 4:30 PM - 7:00 PM | Registration               |
|                | 5:30 PM - 6:00 PM | New Attendee and Board Member Reception |
|                | 6:00 PM - 8:00 PM | Opening Reception          |

| TUESDAY, JUNE 28 | 7:45 PM - 6:00 PM | Registration/Check-In      |
|                 | 8:00 AM - 7:15 PM | Display Tables Available for Premier Sponsors |
|                 | 8:00 AM          | Continental Breakfast    |
|                 | 8:00 AM - 8:15 AM | Committee Chair Meeting   |
|                 | 9:00 AM - 10:00 AM | Opening Presentation      |
|                 | 10:00 AM - 10:40 AM | Break                   |
|                 | 10:40 AM - 11:45 AM | Committee Meetings       |
|                 | 11:45 AM - 1:15 PM | Lunch Presentation       |
|                 | 1:15 PM - 3:15 PM | Committee Meetings       |
|                 | 3:15 PM - 3:40 PM | Break                   |
|                 | 3:40 PM - 5:40 PM | Committee Meetings       |
|                 | 5:45 PM - 7:15 PM | NORA Happy Hour Reception |

| WEDNESDAY, JUNE 29 | 8:00 AM - 9:00 AM | Past Presidents Committee |
|                   | 9:00 AM - 12:30 PM | Board of Directors Meeting |
# 2016 NORA Mid-Year Meeting Registration

**Contact Info**

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## Registration

### EVENT

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Is this your first time attending a NORA Meeting?  ☐ Yes  ☐ No

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- Color Logo in Company Index  ☐  $150  **SOLD**

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**Credit Card Only:** Email casey@noranews.org or fax 703-753-2445

**Check or Credit Card:** Mail to 7250 Heritage Village Plaza, Suite 201

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**Questions:** Call 703-753-4277 or email casey@noranews.org

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Call 1-888-421-1442 and ask for the NORA rate or go to www.noranews.org > Events by May 30, 2016 to book at the discounted rate. Be aware that rooms may sell out early.
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, 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.

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Your company logo and message will be printed on all room key cards given to attendees staying at the Hyatt Regency Boston Hotel. Offered via lottery.

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Your logo will be on the notebook placed at each seat at the beginning of the Mid-Year Meeting on Tuesday, June 28. Offered via lottery.

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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.

Price: $1000

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Have your logo be the only one prominently displayed during lunch on Tuesday, June 28. Your company logo will appear on all Mid-Year Meeting agendas as the exclusive lunch sponsor and your company will be able to address the entire group for 60 seconds before the presentation. You may provide additional signage if desired.

Price: $2500

**PREMIER SPONSOR**

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 Tuesday, June 28 and are allowed up to 60 seconds to address the entire group at the beginning of the meeting on Tuesday. Your company logo will be printed 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.

Price: $750

**LUNCH SPONSOR**

Your company logo will be prominently displayed during lunch on Tuesday, June 28. Your company logo will appear on all Mid-Year Meeting agendas. You may address the entire group before lunch for up to 60 seconds. Only six available.

Price: $700

**HAPPY HOUR SPONSOR**

Your company logo will be prominently displayed during happy hour on Tuesday, June 28. 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 Mid-Year Meeting agendas.

Price: $625

**CHARGING STATION SPONSOR**

Your company logo will be prominently displayed by a charging station near the NORA registration desk to supply power for mobile devices.

Price: $550

**BREAKFAST SPONSOR**

Your company logo will be displayed during breakfast on Tuesday, June 28. Your company logo will appear on all Mid-Year Meeting schedules.

Price: $250

**CANDY BOWL SPONSOR**

Your company logo will be displayed next to the candy bowl at registration on Monday, June 27 and on Tuesday, June 28.

Price: $175

**EVENT BOOK ADVERTISING**

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**FULL PAGE COLOR AD**

Price: $575

Ad is 7.5” by 10”.

**FULL PAGE BLACK AND WHITE AD**

Price: $390

Ad is 7.5” by 10”.

**HALF PAGE COLOR AD**

Price: $390

Ad is 7.5” by 5”.

**HALF PAGE BLACK AND WHITE AD**

Price: $225

Ad is 7.5” by 5”.

**1/3 PAGE HORIZONTAL COLOR AD**

Price: $315

Ad is 7.5” by 3.5”.

**1/3 PAGE HORIZONTAL BLACK & WHITE AD**

Price: $200

Ad is 7.5” by 3.5”.

**COLOR LOGO BY COMPANY INDEX**

Price: $150

Logo is 1/2” high
The lunch speaker at the NORA Mid-Year Meeting will be Roy Schumacher, who will be speaking on where the oil market is headed.

We all watch crude oil prices because it is a major driver in our industry. Many of us monitor natural gas. But in today’s market, used oil companies are affected by so much more. Base Oil, VGO, MDO and even VTAE can and are impacting local markets. Add in the recent major supply/demand shifts in the asphalt and re-refining markets and suddenly the used oil market has become more complex. This presentation will help shine a light on market changes and trends and why it is important to monitor much more than crude oil in order to understand where the market is headed.
The NORA Trade Show will feature over 40 exhibit spaces with companies displaying the latest products and services available to the liquid recycling industry. See page 22 for the current trade show floor plan. Companies interested in exhibiting should contact Casey Parker at (703) 753-4277 or casey@noranews.org.

Visit www.noranews.org > Events for more information.

There are many sponsorship and advertising opportunities available for the 2016 NORA Conference & Trade Show. For as low as $150, you can support your industry as well as promote your company. You may purchase your sponsorship or advertising space by calling Casey Parker at (703) 753-4277, emailing casey@noranews.org or by visiting the “Sponsorship” page at www.noranews.org.
The 2016 NORA Annual Conference and Trade Show will be held November 9-12, 2016 in Kohala Coast on the big Island of Hawaii at the Fairmont Orchid. Join 400 plus industry leaders for networking, business development, and education.

**REGISTER NOW**

Register online to attend the Conference at www.noranews.org. Register early to receive the lowest price and a room in the discounted NORA room block.

**Closest Airport:** Kona International (KOA)

“If your target audience consists of people in the oil recycling industry, this is the most concentrated you’ll find them.”

- Alan Fox, MemPore Environmental Technologies

**HOTEL INFORMATION**

Hotel rooms available for NORA members at the Fairmont Orchid for $229/night with no additional resort fee. This rate is available beginning November 3 and is good through November 16–extend your stay and enjoy the Big Island! To reserve your room call 1-(800)-845-9905 and ask for the NORA room block, or book online through www.noranews.org > Events.

*Please note that the only valid ways of securing a room in the NORA room block are by calling the Fairmont Orchid Hotel or booking through the link on the NORA website.*
2016 Trade Show FLOOR PLAN as of 4/26/16 (Subject to Change)

RESERVE YOUR BOOTH TODAY!
The 2016 NORA Trade Show is currently 55% sold. Call Casey Parker at (703) 753-4277 to reserve your booth.

2016 Conference & Trade Show TENTATIVE AGENDA

WEDNESDAY, NOVEMBER 9
10:00 AM - 2:00 PM  Exhibitor Set Up
2:00 PM - 7:00 PM  Conference Check-In/Registration
3:00 PM - 4:00 PM  Board Member Meeting
4:00 PM - 4:30 PM  New Member/Board Member Reception
4:30 PM - 8:30 PM  Grand Opening Reception in Trade Show

THURSDAY, NOVEMBER 10
7:00 AM - 11:45 AM  Conference Check-In
7:00 AM - 8:00 AM  Continental Breakfast in Trade Show
8:00 AM - 10:00 AM  Conference Sessions Open
10:00 AM - 10:35 AM  Refreshment Break in Trade Show
11:00 AM - 11:45 AM  Spouse/Guest Brunch
10:35 AM - 12:00 PM  Conference Sessions
12:30 PM - 7:00 PM  25th Annual NORA Golf Tournament
1:00 PM - 7:00 PM  NORA Annual Fishing Expedition

FRIDAY, NOVEMBER 11
7:30 AM - 8:30 AM  Continental Breakfast in Trade Show
8:30 AM - 10:00 AM  Conference Sessions
10:00 AM - 11:00 AM  Refreshment Break in Trade Show
11:15 AM  Trade Show Tear Down
11:00 AM - 12:20 PM  Conference Sessions
5:00 PM - 9:00 PM  NORA Closing Party

SATURDAY, NOVEMBER 12
12:30 PM - 2:00 PM  Optional Tours, TBD
                     Sightseeing/Activities on your own
Giving customers the superior products they deserve.

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The State of the Wastewater Industry

Chris Harris, NORA General Counsel

PART ONE: Interview with Dave Brown, President Valicor Environmental Services

Question: From your perspective, what do you consider are the most significant challenges to wastewater recycling in the United States today?

The most troublesome are PCBs. I’ve read Dave Coles’ report on PCBs that NORA submitted to EPA. It does an excellent job of summarizing the problem. We still get hits of over 50 parts per million of PCBs. Even though these hits are isolated in guard tanks, a PCB incident is never cheap. If everyone in the industry fully implemented NORA’s Best Management Practices, that would definitely help. But many of the one or two truck operators don’t bother to test for PCBs. Amazingly, EPA never goes after the PCB generator. What kind of message is that?

Question: What’s another challenge?

Non-conforming waste streams. A generator will represent on a profile that his material is non-haz. We test it and it has a pH of one. That’s just one example. Of course, we take care of that problem properly and report it right away to Ohio EPA. Sometimes EPA launches an enforcement investigation of us—but again, never the generator. We have a non-conforming waste/profile situation about once a month. We always handle it correctly but it can be a major headache.

Question: What’s another wastewater headache?

Well, some cities seem to think that they can lower the effluent limits on our permits at any time. There’s no consultation, no advance notice. We prefer to work with government officials in a constructive, good faith relationship. But these permit modifications are sudden and arbitrary. They don’t understand that a significant reduction in the limit on ammonia, for example, can only be achieved by costly pretreatment technology. I think a lot of this pressure to lower limits comes from EPA.

Question: What’s the current situation with off-spec used oil?

There’s hardly any market for it these days. Re-refiners don’t want it. Re-refiners only want very clean automotive used oil. Blending it to make on-spec is fine except that is costly. So, if you had a cutting oil with, say, 6,000 parts per million of total halogens, you’d never try to blend it down to below 1,000. Too expensive. By the way, below 4,000 parts per million would be technically on spec for halogens—but no one will burn used oil fuel if the halogens are above a thousand. There’s a small market for re-constituted cutting oil—but not much. Most of the off-spec used oil and industrial oil we handle is blended for the export market and becomes No. 6 oil.

Question: What’s another new challenge?

Fracking water. EPA does not want fracking water to be handled by CWTs. EPA wants it pumped back in the ground. We test for total dissolved solids. Water that is high in TSDs is often fracking water.
The danger with fracking water, by the way, is radioactivity—which can be very high and harmful.

**Question:** Any other challenges you can think of?

You bet. It’s the [expletive deleted] government—at every level. Very intrusive and very aggressive. Much more intrusive than 25 years ago when I got started in this business. I know it’s a cliché but every time you’re guilty until proven innocent. And you have to deal with so many agencies: OSHA, EPA, IRS etcetera. One year we had to deal with 12 different government agencies conducting audits. I spend at least 25 percent of my time battling the government—usually successfully because we’re pretty careful about crossing our t’s and dotting our i’s.

**PART TWO:**
*Interview with*
Brett Conover, National Account Manager/Used Oil Liquid Environmental Solutions
Chairman of the NORA Wastewater Committee

**Question:** What are the real challenges to the wastewater recycling industry today?

I’m glad you asked that question. I think the biggest challenge is the increasing stringency of contaminant limits. Each renewal of our discharge permits in various cities involves more difficult restrictions. For example, the renewed permit might say “cut your phosphate effluent in half: from 100 ppm to 50 ppm.” Our plants are designed around their original permits. It is neither easy nor inexpensive to buy new technology or equipment to meet these new restrictions. The profit margins in our industry right now are extremely thin. Buying new equipment for one plant can easily cost $200,000 or more. There goes a good portion of a plant’s profit.

A lot of the pressure on reducing contaminant levels in our discharges comes from the POTWs. The POTWs have an easier job of treatment if they continue to push the treatment requirements upstream to the CWTs. One example of that is a POTW that decided to start land farming their sludge. EPA said the levels of molybdenum in their...
sludge were too high for land farming. Instead of dealing with that issue themselves—which they could have—they modified our permit to force us to adjust our treatment technology to reduce our molybdenum discharges. This also added cost to the generators. What was once a manageable waste stream now may require solidification.

Another problem is what I call “front end” restrictions, that is, the limits some cities are now placing on our incoming wastewater. An example is restricting the incoming limit on benzene even though we have the technology and expertise to treat benzene and meet our discharge limits. I think it is an overreach, frankly.

Questions: What about non-conforming waste streams? Is that a problem?

Absolutely. Although we deal with it and we train our employees to respond properly, it is always a major annoyance. We once had a generator who misrepresented his waste. It had a very low pH and it was unknowingly pumped into our aluminum tank truck. So it took several hours to track down this customer, have them pump out our truck, and arrange disposal. Meanwhile our tank was slowly corroding away. Even though we check the pH before loading these things still happen.

Question: Any other challenges?

The disappearing off-spec used oil market. Refiners want only the “cleanest” used oil and the refiners have an increasing demand for high quality on-spec used oil. What is left includes a lot of hard to treat industrial oils and other off-spec used oils. There’s virtually no demand for it because in today’s market burners can buy virgin oil at very reasonable costs and good quality on-spec RFO for even less. Or the burners now burn natural gas. So you can’t even give away off-spec used oil fuel. A concern of mine is that as the costs go up to generators who really balk at having to pay to have their used oil picked up—could likely turn to solidification so it can be landfilled (off-spec or on-spec) to offset the higher costs. Or, used oil generators will acquire space heaters and burn used oil even in the summertime. Those are two dangerous trends that I am concerned about.
Water treatment is a way of life for many NORA members. Oil collectors and processors can be challenged with unique water treatment situations. Many of these situations require the need for biological systems to treat the waste before being sent to a municipal treatment facility or the need to pay that facility a great deal of money to do the treatment for them. Typical processes include oxidation and/or activated sludge. For each treatment technology the use of oxygen is important. Most oxygen can be taken from the air but more and more NORA members are moving to more rigorous treatment processes which can mean moving to pure oxygen rather than the small percentage contained in the air. Using pure oxygen allows aeration systems to treat more waste without requiring significant capital equipment.

Aeration via oxygen rather than air has a number of advantages, including:

- Reduced VOC emissions
- Higher treatment rate
- Enhanced ability to treat sulfur/H₂S
- Reduced foaming and sludge yield
- Smaller system with reduced power requirements

NORA member Air Products has been a leader in oxygen for water treatment for over 30 years. They have recently developed the Halia Mixer Aeration system jointly with Aqua Aerobics, with a focus on adding oxygen to water with industry-leading efficiency. This unit is a high speed, direct drive floating mixer equipment with oxygen injection. The schematic below illustrates how this system integrates your treatment area with oxygen supply.

For more information or questions on oxygen solutions for wastewater treatment, contact Air Products at 800-654-4567, program 7401 or gigmrktg@airproducts.com.

### Implementing Novel Wastewater System for Waste Oil Recyclers

Air Products’ unique, energy-efficient mixer aerator can provide you with the following benefits:

- Minimized capital investment
- Flexibility in treatment based on variable dissolved oxygen requirements
- Easily retrofitted, wet installed
- Low maintenance requirements
- Surface accessible with no floor mounted equipment

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On April 7, 2016, NORA submitted to the EPA a lengthy report entitled “PCB Infiltration Into the Used Oil Recycling System: Causes, Costs and Corrective Actions”. The report, written by an independent environmental consultant, David G. Coles, discusses the widespread use of PCBs in the United States for over half a century (from 1929 to 1979). Because PCBs were so “ubiquitous” for many decades, the Coles report pointed out that “the widespread assumption that PCBs would be ‘flushed out of the system’ within a decade or so after the manufacturing of PCBs was prohibited has turned out to be wildly over-optimistic.” As a result, “it is clear that the oil recycling industry bears the brunt of the unknown but probably massive quantity of PCBs that continues to infiltrate used oil.”

A key component of the Coles report were the confidential interviews of 25 oil recyclers (most of whom also managed wastewater) who provided important statistics on the impacts of PCB contamination incidents. According to the report, for the companies that reported having had one or more PCB incidents, the total cost resulting from their largest incidents exceeded $33,000,000. This amount does not include the more numerous smaller PCB incidents. Overall, there were 132 PCB contamination incidents over the past 20 years at 17 of the 25 companies that were surveyed. The average cost of the largest PCB incident was approximately $2,000,000. Eight companies reported that they encountered no PCB incidents. However, two of these companies stated that they did not test for PCBs.

On a positive note, based on the survey of the oil recyclers, NORA’s effort to educate its members on the need to implement Best Management Practices has been “largely successful.” Of the 25 companies surveyed all but one (a non-NORA member at the time of the survey) were knowledgeable about the BMPs and “22 out of the 25 companies are implementing at least some of the BMPs.” However, the cost of implementation is substantial. According to the survey results, “the average annual cost of implementing BMPs is $233,000.”

One finding in the Coles report will not surprise anyone that has experienced a PCB incident. Even where the original PCB generator has been clearly identified, EPA will not launch an enforcement action against the generator. Instead, EPA imposes heavy fines on the oil recycler who also has to pay for the remediation project. The one and only EPA enforcement action against a “generator” occurred when EPA targeted the City of Tacoma that operated a DIY used oil collection facility at a landfill. The actual culprit who disposed of the PCBs as DIY motor oil was never identified.

The Coles report also analyzed the costs involved in addressing a PCB incident under current TSCA regulations in comparison to the costs under NORA’s proposal to EPA.

Under NORA’s proposal, the cost of addressing a used oil/PCB incident would be significantly reduced in most cases -- but certainly not eliminated. An oil recycler’s remediation costs under the current TSCA regulations are likely to be 3 to 5 times the costs under NORA’s proposal. These remediation costs are in addition to the oil recycler’s expenses to implement NORA’s Best Management Practices. Under NORA’s proposal these costs may be manageable; under EPA’s current rules, especially in today’s devastating energy market, the oil recycler’s costs would be catastrophic.

The Coles report can be found on the NORA website by clicking on the link in the press release on noranews.org/news/

A meeting with EPA is scheduled for May 26, 2016 to discuss the report’s findings as well as the status of EPA’s approval process relating to NORA’s proposal for PCB/TSCA Reform.
HAS YOUR COMPANY CONTRIBUTED TO THE 2016 PCB/TSCA REFORM PROJECT?

2016 is a new year which means another chance to contribute to the PCB/TSCA defense fund. NORA will match the first $30,000 in contributions.

When taking on an initiative as important and challenging for the industry as PCB/TSCA Reform, it is imperative to retain a top law firm. NORA has done that by retaining the services of Steve Shimberg. NORA thanks past contributors to this reform project. The anticipated budget to properly fund this project in 2016 will be $100,000. NORA’s annual budget alone cannot support this type of project.

NORA needs your help. The association is asking for all members to participate in this effort to fully fund this vital project.

DOUBLE YOUR DONATION: The NORA Board of Directors has authorized a $30,000 match program for 2016. This means that the association will match dollar for dollar each of the first $30,000 of contributions. This will help get us to 60% of our goal.

If you would like to make a contribution to the 2016 NORA PCB/TSCA Reform Project, contact Scott at sparker@noranews.org or call (703) 753-4277. Alternatively, a $100 voluntary contribution has been added to this year’s membership dues invoices. You may opt out of this contribution by contacting NORA.
Any Facility Can R.I.S.E. to a Quality Tank Inspection Program

**Recordkeeping, Industry Standards, Scheduled Inspections and Evaluation**

Submitted by Dylan Brown, Tank Consultants, Inc.

*How EPA Inspectors Examine Tank Integrity Programs:*
Nearly all facilities with above ground storage tanks (ASTs) follow the EPA regulated Spill Prevention Controls and Countermeasures (SPCC) requirements and are subsequently required by federal law to have a quality tank inspection program in place. To determine what an acceptable tank inspection program looks like can be difficult, but there are some firm common themes found throughout various EPA publications and guidelines.

*Recordkeeping is a vital component that will be reviewed in detail when EPA inspectors review a facility’s SPCC plan. At a minimum, facilities must keep written inspection procedures and a signed record of all inspections and testing for a period of three years. In most cases, inspection/documentation procedures and inspection intervals are also dictated by the most relevant industry standard for each specific type of equipment. Most industry standards for ASTs have recordkeeping requirements beyond the three year minimum. Additionally, SPCC Section 112.9(c)(3) specifies additional inspection requirements to be completed by trained facility personnel periodically on a regular schedule. These inspections must also be documented and kept for a minimum of three years, and in many cases even longer depending on the inspection standard that is being utilized. A great starting point for any tank owner is to compile a list of every storage tank with corresponding identification numbers. The next step is to identify the most relevant industry standard.*

*Industry Standards can be one of the more difficult components of SPCC requirements to understand, but correct application of relevant industry standards dictate every aspect of a tank inspection program. Once all tanks have been identified, additional information should be compiled starting with the year the tank was built or manufactured, tank diameter and height, capacity, and material. (Carbon steel, stainless steel, fiberglass, plastic, etc). The EPA publication/guideline “SPCC Guidance for Regional Inspectors” is a great resource to determine what the most relevant inspection standard for each tank, specifically in Chapter 7: Inspection, Evaluation, and Testing. Each tank must be assigned a standard to follow, and at this point the facility should acquire a copy of the standard assigned for reference. Most standards will require formal inspections to be completed by certified and experienced inspectors at some point in addition to periodic inspections performed by onsite personnel. Each standard will have specific guidelines for testing requirements, recordkeeping, procedures, and frequency of inspections.*

*Scheduled Inspections are an important aspect of a quality tank integrity program. Scheduled inspections are also referred to as formal inspections, and are typically completed by an inspector with certifications and experience specific to the relevant standard. Scheduled inspections for all tanks should be documented within your SPCC plan, and as a minimum include the following information for each tank: tank identification number, construction date (in service date), dates of any recent formal external or internal inspections, and the next scheduled (formal) external and/or internal inspection(s). Scheduled (formal) inspection intervals should be determined according to the relevant industry standard assigned for each individual tank. Additionally, each relevant industry standard will also dictate the frequency and scope for what is also known as periodic inspections. Periodic inspections are performed by trained and competent facility personnel and are essential to a quality tank.*
Spill Prevention Control and Countermeasures (SPCC): From the baseline inspection to technical guidance/training to storing your inspection reports, TCI is here to assist you in every step of the SPCC plan process. By specializing in SPCC inspection services, you can rest assured that your facility will be fully compliant once TCI has completed the job.

TCI Services, Inc. has proven to be the most trusted industry professionals in all things aboveground storage tank related for over 20 years. Proudly known as the “Storage Tank Experts,” some of TCI's services include, but are not limited to the following:

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- API 653 Storage Tank Inspection, Construction & Engineering Services
- FPTI 2007-1 Fiberglass Tank Inspection
- Environmental Compliance Consulting Services

**Spill Prevention Control and Countermeasures (SPCC):** From the baseline inspection to technical guidance/training to storing your inspection reports, TCI is here to assist you in every step of the SPCC plan process. By specializing in SPCC inspection services, you can rest assured that your facility will be fully compliant once TCI has completed the job.
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**2016 NORA MID-YEAR MEETING**
June 27-29 2016
Boston, Massachusetts
www.noranews.org > Events

**2016 NORA CONFERENCE & TRADE SHOW**
November 9-12, 2016
Kohala Coast, Big Island of Hawaii
www.noranews.org > Events

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- **1980s**
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xlgroup.com/insurance/environmental
Thanks to her father, Melinda Glenn is intimately familiar with every aspect of her 1964 Ford Fairlane 500.

Glenn, one of seven children, grew up in LaCrosse, Wisconsin. As her older siblings reached driving age they acquired, with their father’s assistance, second hand Ford Mustangs that were in need of resuscitation.

Her father was of the opinion that if the young drivers invested some time working on the cars they might treat them gently and safely.

As Glenn approached driving age she naturally assumed her father would find her a used Mustang. She didn’t know that in his youth her father had owned a 1964 Ford Fairlane 500, so she was surprised one spring day in 2001 when he called to inform her that he had just purchased a 1964 Ford Fairlane 500 for her in Arcadia, Wisconsin. It was just like the one he had owned years before.

True to form she was required to get grease under her fingernails and turn some wrenches in order to make the car roadworthy.

The Ford arrived at her parents’ home on a 115-inch wheelbase with a 289-cubic-inch small block engine under the hood that required rebuilding with an Edlebrock package topped with a four-barrel carburetor.

By 2002 the restoration of the Fairlane was complete with a few personal touches such as substituting Deep Amethyst Pearl paint for the original burgundy.

The double bench seat was reupholstered along with the beige carpeting. As was typical in the 1960s the metal dashboard was painted.

Her father agreed to feed the Ford one tank of gasoline a week. Unfortunately, the teenager burned two or more tanks of fuel a week. “It gets about 12 miles per gallon on a good day,” she reports. The car came with an automatic transmission, but it now has a 4-speed manual floor-mounted transmission.

By the time the car was in like new condition Glenn was a student in Chicago. To avoid harsh winter weather she left her car at home under cover.

Soon after graduation Glenn was wed and moved to Bainbridge, Georgia where she no longer has to contend with garaging her car from the time the first snowplow arrives to when spring flowers bloom. The heater in her car works but is no longer needed. Her car now rides on 14-inch Cragar wheels wrapped in radial tires. Stopping chores are relegated to drum brakes.
Six quarts of 10W30 oil keep the engine running smoothly while Glenn admits the 120 mile per hour speedometer is overly optimistic. “I’m sure it would never get there,” she says. The 2,925-pound Fairlane 500 might come close since she tweaked the engine when it was being overhauled with Edlebrock parts that Ford didn’t supply.

The absence of any power assisted options such as windows, seats, steering or brakes do not dampen her enthusiasm for her Fairlane 500.

She says wing vent windows compensate for the lack of air conditioning.

During the 1964 model year production, a total of 42,733 cars like hers were manufactured, each one with a base price of $2,341. The chances are that none of them are in the fantastic condition as Melinda Glenn’s Fairlane 500

This classic Used Oil Generator is owned by a NORA member from

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How is your company connected to the industry?
How/why was the company established?
Flottweg specializes in the manufacture of equipment for liquid solid separation. These devices include decanter & tricanter centrifuges, disc centrifuges, and belt presses. We have applications in many industries including oil processing, oil recovery, mining extraction, chemicals & pharmaceutical manufacturing, fruit and vegetable production, water and wastewater processes, and biodiesel production.

What products/services does Flottweg Separation Technology, Inc. provide?
The liquid solid separation devices allow the various industries to separate liquid solid mixtures and recover a variety separation products. Sometimes the end user wants to recover the solid products and sometimes the liquid phase(s). In the oil recovery business our products separate the oil/water/solids waste products. The recovered oil can then be reused or further processed for a variety of uses.

What value do you find in NORA membership to expand your business opportunities?
NORA puts us in touch with the folks with “boots on the ground” in oil recovery. NORA members are a focused and hard working group who are great to work with.

How do your products assist NORA members in the wastewater recycling industry?
We provide design and application assistance as well as the separation devices(tricanter for example) as well as startup services related to the system.

What are the biggest challenges and opportunities you see facing the wastewater recycling industry over the next five years?
Over the next five years I expect further regulation requiring more waste oil to be reprocessed. This is good for NORA members who provide a great service for their customers and the environment.
At Vertex Energy, we see things differently. Challenges are just new opportunities to create responsible solutions. By collecting, recycling and re-refining used motor oil and other petroleum coproduct streams, we are working hard to decrease dependence on foreign oil and reduce environmental impact.

To learn how we’re Producing Tomorrow’s Energy, visit us at VertexEnergy.com

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NORA Supplier/Vendor Members in good standing as of 04/13/16 are listed below. 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. Companies that are in *red* are exhibiting at the 2016 NORA Conference & Trade Show as of 04/13/16.

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The 2016 NORA Membership Directory incorrectly listed the Supplier/Vendor companies for Air Pollution Control Systems in the Buyers Guide Index (Pg. 177). The correct company listings are:

Air Products and Chemicals ....................20
Praxair, Inc. ............................................107

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