

Waste Allocation Process Summary Report
Philip Services Corporation Superfund Site; Rock Hill, South Carolina

This memorandum summarizes FTI Consulting's process for assembling Waste Contribution Reports for the Philip Services Site.

Laidlaw Data Received

The Group provided FTI what is understood to be Laidlaw's electronic business records of waste shipments from underlying generators (i.e., customers) to Laidlaw, shipments of waste among Laidlaw facilities, and shipments of waste from Laidlaw facilities to the Philip Services Site (hereafter "Laidlaw Records"). The data set comprising the Laidlaw Records consists of a zip file named "WmsData.zip" that includes the underlying relational database files used with Laidlaw's proprietary software program referred to as the Waste Management System (WMS). It is understood that the information within the Laidlaw Records was coded into the WMS system by Laidlaw employees when waste shipments were received, processed, and transshipped out from Laidlaw facilities to further processing or disposal sites, to include the Philip Services Site.

In addition to the Laidlaw Records, FTI also received access to the Group's Waste-In Database. This database includes electronic copies of the manifests received by the Philip Services Site.

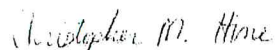
Data Analysis

FTI conducted a detailed review of the Laidlaw Records and identified a series of tables, fields, and relationships that track individual waste containers, from the time Laidlaw received the waste from the underlying generator to the time the waste was transported to the Philip Services Site. Selected fields, as summarized in Table 1, can be used to track, describe, and calculate the waste attributed to each underlying generator. FTI's analysis was limited to waste shipped from Laidlaw to the Philip Services Site, meaning that waste sent to other disposal facilities was removed from the analysis.

Figure 1 provides a graphical depiction of how pertinent fields in the WMS can be used to track waste through the Laidlaw database systems.

Waste Contribution Reports

FTI assembled the Waste Contribution Reports using the Laidlaw Records to summarize underlying generator information, the type and weight of waste provided to Laidlaw, the Laidlaw load number and the uniform hazardous waste manifest number that were used to ship the waste from Laidlaw to the Philip Services Site. These data points allow for the tracking of waste through the Laidlaw Records to ultimate disposition at the Philip Services Site.



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Table 1
WMS Database Field Summary

Field	Field Description	Backend Fields
CUSTOMER CODE	Unique customer code assigned by Laidlaw to each generator.	CUST_CODE
OUTGOING MANIFEST	Unique waste manifest number for waste shipped from Laidlaw.	O_MANIFEST
LOAD NUMBER	Unique load number for waste shipped from Laidlaw.	LOAD_NO
RECEIVE DATE	Date waste received by Laidlaw from generator.	RECEIVDATE
DRUM NUMBER	Unique container identifier assigned by Laidlaw.	DRUM_NO
LIDLAW WASTE DESCRIPTION	Description included in waste profile assigned to container.	DESC
CONTAINER TYPE	Container type provided to Laidlaw from generator.	DOT_TYPE
SIZE	Container size provided to Laidlaw from generator.	SIZE
INCOMING DESCRIPTION	Information used to assign waste description provided to Laidlaw from generator.	IN_SHIP / IN_LABEL
EPA WASTE CODES	Information used by Laidlaw to describe the waste.	EPA_CODES
OUTGOING DESCRIPTION	Laidlaw waste shipment description.	OUT_SHIP / OUT_HAZ / OUT_LABEL
OUTGOING UN/NA CODE	Laidlaw waste shipment description.	OUT_UN_NA
WEIGHT	Laidlaw calculated weight by dividing the total line-item weight by the number of containers listed on the generators manifest, unit of measure used for weight, in pounds (lbs.) or kilograms (kg). Weights rounded to nearest pound or kilogram.	WT / WWT_UM
VOLUME	Laidlaw calculated volume by dividing the total line-item volume by the number of containers listed on the generators manifest, unit of measure used for volume.	VOL / VOL_UM
CALCULATED WEIGHT	FTI-calculated field using 8.33 pounds per gallon (density of water) where weight not reported; kilograms converted to pounds where necessary using conversion factor 2.20462 pounds per kilogram. Weights rounded to nearest pound.	WT-CALC
lbs.	Pounds	P, value used for pounds
G	Gallons	G, value used for gallons
kg	Kilograms	K, value used for kilograms
INCOMING MANIFEST	Incoming manifest number and/or incoming state document number.	I_MANIFEST / STATE_DOC
INCOMING UN/NA CODE	Incoming waste shipment description.	IN_UN_NA
Generator	Compilation of fields CUSTOMER / CUST_CODE / EPA_ID	CUSTOMER / CUST_CODE / EPA_ID
Generator Address	Compilation of fields ADDRESS1 / CITY / STATE / ZIP	ADDRESS1 / CITY / STATE / ZIP

Generator Nexus to Site Established through Laidlaw Waste Management System

Figure 1

