

## REGULATORY COMPLIANCE PROJECT CAPSULES

### 1. Coil Coater - Denver, Colorado

Paragon provided regulatory support for seven years. Activities included sampling, testing, data evaluation, reporting and coordination with regulatory agencies for air emissions, Hazardous Materials Inventory Statement (HMIS) for the local fire department, RCRA hazardous waste, SARA Title III, stormwater, and process wastewater discharges to the sanitary sewer. In addition, a Fire Incident Report was prepared for a suspected arson fire that caused significant damage to the facility.

### 2. Wastewater Disposal Ponds - Wyoming, Colorado and Utah

Paragon provided regulatory compliance support for existing and newly constructed E&P wastewater disposal pond facilities. In addition to permitting, design and construction quality assurance, activities included preparation and implementation of stormwater permits and Stormwater Pollution Prevention Plans (SWPPPs), assistance with obtaining and implementing air permits, review and coordination of hazardous and used-oil waste procedures, and assistance with SARA Title III reporting.

### 3. Physical Therapy Clinics – Over 200 facilities throughout the United States

Paragon provided regulatory compliance support for existing and newly acquired clinics. Paragon reviewed the clinics' biohazardous and medical waste procedures including sharps and expired pharmaceuticals and the permitting and storage of U.S. Drug Enforcement Agency (DEA)-listed controlled substances. Paragon also reviewed and consulted on the handling and storage procedures of pool chemicals as well as State and local aquatic therapy permitting. Paragon assisted the clinics with their compliance with Worker Right-to-Know programs.

### 4. Pharmaceutical Companies – United States and Canada

Paragon provided regulatory compliance support for newly acquired pharmaceutical companies and their facilities. Paragon reviewed and consulted on the companies' biohazardous and medical waste procedures including sharps and expired pharmaceuticals, the permitting and storage of DEA-listed controlled substances, storage and disposal practices for hazardous and non-hazardous waste, radiation permitting, stormwater permitting and air permitting. Paragon also reviewed and implemented Spill Prevention, Control and Countermeasure Plans for petroleum tanks associated with back-up generators.

### **5. Gasoline/Convenience Stores – United States**

Paragon provided regulatory compliance for existing, newly acquired and newly constructed facilities. Activities included assistance and management of storage tank compliance including tank registration, testing, repairs, leak detection and Spill Prevention, Control and Countermeasure Plans. Paragon also assisted in the coordination of governmental and private inspections of the facilities as well as responding to inspection violations.