

## INTRODUCTION

Hallen Environmental Services, LLC. (hereinafter referred to as HES) recognizes the need to identify and avoid any real, potential, or perceived organizational or personal conflict of interest that could have an impact on the integrity of work performed for clients. HES will monitor its business activities to prevent and/or avoid organizational or personal conflicts of interest in accordance with this plan.

HES, has established this Conflict of Interest Plan (hereinafter referred to as COI) to define procedures for the identification; avoidance; neutralization; or mitigation of COI; staff training; and enforcement of HES policies and procedures. The plan describes interactive databases and associated search procedures designed to detect and identify possible COI situations and thereby to ensure that its contracts with U.S, State or Local Government agencies or Commercial / Private Clients as required, either as a prime contractor or subcontractor, are in compliance with contract requirements.

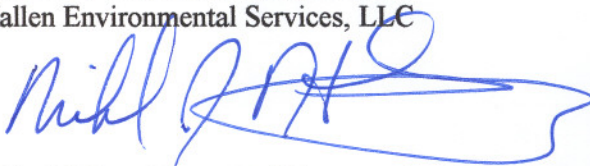
HES's COI Plan is managed by the Contract Manager. The Contract Manager is responsible for maintaining the COI process and ensuring that all COI identified are properly documented, the COI data base is continually updated, and all other components of the HES COI Plan are functioning properly.

As part of our COI plan, HES warrants that, to the best of our knowledge and belief, there are no relevant facts or circumstances which could give rise to an organizational conflict of interest, as defined in the Federal Acquisition Regulations (FAR) Subpart 9.5, and that HES has disclosed all such relevant information. HES is not a potentially responsible party (PRP) at any sites. Also, HES is not presently involved in any related work for PRPs at any privately funded sites. Any affiliate laboratories or waste Transportation, Storage and Disposal facilities (TSDF's) associated with HES or any of our joint venture partners, team partners or subcontractors will be precluded from competing for such services.

Conflict of Interest Plan Approved by:



Shepard T Poole, Managing Member  
Hallen Environmental Services, LLC



Mike Hickey, Manager of Construction Operations  
Hallen Environmental Services, LLC



Adrian Gill, Director of Environmental Services  
Hallen Environmental Services, LLC



Joseph Bozzello, Contract Manager  
Hallen Environmental Services, LLC