

REMOVAL ACTION REPORT
Tronic Plating Company Site
Farmingdale, New York

September 1993

Prepared for:

Commerce Holding Company, Inc.
PO Box ~~072~~
Hicksville, New York - 11802

Attention: Mr. Irwin Cain

Prepared by:

CA Rich Consultants, Inc.
404 Glen Cove Avenue
Sea Cliff, New York 11579

CA RICH CONSULTANTS, INC.

Certified Ground-Water and Environmental Specialists

September 28, 1993

Commerce Holding Company, Inc.
P.O. Box 672
Hicksville, New York 11802

Attention: Irwin Cain, President

Re: REMOVAL ACTION REPORT
TRONIC PLATING COMPANY SITE
FARMINGDALE, NEW YORK

Dear Mr. Cain:

Attached is a copy of our Removal Action Report for the Tronic Plating Company Site. Copies of this report have been delivered directly to the EPA and NYSDEC as required in the Administrative Order.

If you have any questions regarding this document, please do not hesitate to call our office.

Sincerely,

CA RICH CONSULTANTS, INC.



Eric A. Weinstock, CPG, CGWP
Project Manager



cc: Gloria Sosa, EPA
John Greco, NYSDEC
Andrew Simons, Esq., Farrell, Fritz, Caemmerer, Cleary, Barnosky & Armentano

**REMOVAL ACTION REPORT
TRONIC PLATING COMPANY SITE
FARMINGDALE, NEW YORK**

1.0 Introduction

The following Removal Action Report has been prepared by CA Rich Consultants, Inc. on behalf of Commerce Holding Co., Inc. in accordance with Administrative Order on Consent for Removal Action, Index Number II-CERCLA-93-0205 (the Order). This Report is prepared to comply with subsections 57 and 58 of the Order -- Removal Action Report -- and with the requirements of section 300.165 of the NCP.

2.0 Background

The history of the former Tronic Plating Company and the investigative activities performed at this property are explained in detail in the EPA-approved Remedial Investigation Report prepared for this project (CA RICH, 1992). As a result of the Remedial Investigation (R.I.), subsurface contamination in the form of heavy metals were discovered in three storm drain sediment bottoms and one sanitary leaching pool sediment bottom. Upon review and approval of the R.I. Report, the EPA issued a Removal Order on Consent to address remediation of the following structures. The location of these are presented on Figures 1 and 2.

- o Three on-site storm drains designated as SD-1, SD-2 and SD-3;
- o Three overflow pools connected to storm drains SD-1, SD-2 and SD-3;
- o A former sanitary leaching pool, designated SP-1, which serviced the bathrooms in the front of the Tronics Facility; and,
- o A former sanitary leaching pool, designated DW-1, which serviced the bathrooms in the rear of the facility.

Note: The property connected to the municipal wastewater treatment plant and sewer lines in 1983.

CA RICH prepared a Removal Action Work Plan in May, 1993. This Plan was approved by EPA and the work initiated in June, 1993.

3.0 Summary of Work Performed Under this Order

3.1 Waste Characterization Sampling and Analysis

On June 17, 1993, CA RICH collected waste characterization samples from the property with oversight performed by an EPA contractor. Using a pre-cleaned polypropylene bailer, one composite storm water sample was collected from storm drains SD-1, SD-2 and SD-3 and analyzed for RCRA metals, volatile and semivolatile organics. Individual bottom sediment samples were collected from SD-1, SD-2, SD-3 and SP-1 using a decontaminated stainless steel hand auger and analyzed for the complete TCLP list of parameters plus copper, zinc, ignitability, reactivity and corrosivity.

On July 23, 1993, three additional soil samples were collected. Soil samples were collected in the former sanitary leaching pool SP-1 at 11 to 12 feet and at 13 to 14 feet below grade. These were analyzed for cyanide and reactivity with the results used to segregate soils for disposal purposes. One sample of the backfill placed above the bottom of the former sanitary leaching pool DW-1 was also collected for analysis of cadmium, chromium and lead.

All samples were delivered to Envirotest Laboratories, Inc. in ice-filled coolers accompanied with trip blanks, field blanks and chain-of-custody documentation.

The results of the waste characterization analysis are attached to this report as Table 1. Based on these results, approval was requested and received from the Suffolk County Department of Public Works to dispose of the storm water in the storm drains at the County wastewater treatment plant located at Bergen Point, NY. Soils with low levels of cyanide were approved for disposal at the Michigan Disposal Facility (ID # MID000724831) located in Belleville, Michigan. Soils exhibiting elevated levels of cyanide were approved for disposal at LWD, Inc. (ID # KYD088438817) located in Calvert City, Kentucky. In accordance with the Order, the EPA was informed of our intended disposal facilities prior to shipment. The EPA agreed to notify the environmental agencies of Michigan and Kentucky of our plans for disposal as required in the Order. Copies of the facility approval letters are attached to this report.

3.2 Removal Operations

On the morning of August 6th, CA RICH and subcontracted remediation contractor Direct Environmental, Inc. mobilized at the site and began the removal of the existing storm water. Representatives of the EPA and NYSDEC were on-site during the removal program. Using a rubber-tired backhoe, the lids to the overflow pools connected to storm drains SD-1, 2 & 3 were excavated and exposed. A vacuum truck was then used to remove the standing water from each of the pools. The vacuum trucks were then driven directly to the Bergen Point treatment plant. Approximately 5,700 gallons of water were removed on August 6th. During the evening of the 6th, a rain storm occurred. An additional removal of approximately 3,200 gallons was performed on the morning of August 7th.

After the remaining storm water was removed, a Vactor (TM) Model number 2100 "super sucker" excavator was used on August 7th and 8th to remove the sediments from the leaching pools. Employing a high vacuum suction, the intake pipe of the Vactor was lowered down to the bottom of each pool and the underlying soil was excavated. Using this method, between 3 and 7 feet of soil was removed from each of the leaching pools until the soil visually appeared to be free of any sludge or staining. The approximate volume of soil removed from each pool during the weekend of the 7th and 8th was 80 cubic yards and is presented on Table 2. All excavated sediments were placed either in plastic lined roll-off containers or staged on poly sheeting prior to disposal. Clean sand and gravel backfill from Broman, a local quarry, was placed in the open excavations.

A mobile X-Ray Fluorescence analyzer (XRF) was employed during the weekend of August 7th and 8th. Operated by the ERM-FAST division, this unit is capable of detecting cadmium, chromium and lead at levels as low as 10 parts per million (ppm). Once reaching the bottom of the excavation in each leaching pool, a soil sample was collected using a hand-operated auger and tested using the XRF. The results of these analyses are presented on Tables 2 and 3. As shown on Table 2, the XRF readings measured from the bottom of the excavations performed on the 7th and 8th were all below the EPA and NYSDEC cleanup guidelines of 10 ppm for cadmium, 98 for chromium and 200 for lead with the exception of leaching pools SP-1 and its overflow pool SP-1 OF.

The cadmium value for SP-1OF at 17.5 feet was 11 ppm, 1 ppm above the cleanup guideline. As the Vactor operator had indicated that the bottom of the concrete rings forming the pool were already undermined, the excavation was terminated in accordance with the provisions in the Work Plan. The laboratory results for the soil sample collected from the bottom of SP-1OF, however, was <0.5 ppm of cadmium, as presented in section 3.3.

During the excavation of SP-1, a stiff, odorous, green-stained soil horizon was encountered at approximately 13 feet below grade which could not be removed using the Vactor. A backhoe was used to excavate the soil around the surface and to break apart the concrete dome covering the pool. Once this was completed, the bucket of the backhoe was used to break apart the stiff soil horizon so that the Vactor could continue the excavation. The XRF measurements from SP-1 at 16.5 feet were 25 ppm for cadmium, 430 ppm for chromium and 35 ppm for lead. Although the values for cadmium and chromium were above the cleanup guidelines, it was decided that we could not safely advance the excavation using the equipment on-site. The excavation was temporarily secured using steel plates and barricades. On the following Monday, August 9th, CA RICH informed both the EPA and NYSDEC of plans to deepen this excavation.

On August 13 and 14, CA RICH and Direct Environmental again mobilized at the site with a crane to deepen the excavation of SP-1. A Bucyrus Erie (TM) "Hydrocrane" was used to remove the existing concrete leaching rings and to excavate down to visually clean soil. After the existing concrete rings were removed and a depth of approximately 17 feet was achieved in the excavation, the walls started to sluff creating an unstable condition and causing clean soils from above to mix with the contaminated soils below. To shore the walls of the excavation, a total of 6 concrete rings 10 feet wide by 3 feet high were placed in the ground. Using this method, the operator successfully extended the excavation down to a depth of 30 feet.

The XRF was not available to screen the bottom samples during this extended removal operation. However, the final buckets of sand and gravel removed by the crane were free of green stains and contained no discernible odors. It is estimated that an additional 180 cubic yards of soil were removed during this operation. The excavation was then backfilled with clean sand and gravel with approval from the EPA and NYSDEC on-site representatives.

3.3 Environmental Sampling and Analysis

A soil sample was collected from the bottom of each of the excavations for laboratory analysis using a decontaminated stainless steel hand-operated auger. The samples from the bottom of the storm drains, the overflow pools, and leaching pool DW-1 were analyzed for total cadmium, chromium, lead and TCLP metals. These results are presented on Table 4.

During the extended excavation of the former sanitary pool, SP-1, soil samples of the excavation walls as well as the bottom were collected. The north, south, east and west walls were sampled using a decontaminated stainless steel hand-operated auger and analyzed for cadmium, chromium, cyanide, lead and volatile organics. These results are presented on Table 5, page 1.

The bottom of the excavation was sampled by collecting soil directly from the bucket of the crane. One sample and one duplicate sample of the last bucket removed from the excavation were analyzed for TAL metals, volatile organics, TCLP metals and TCLP organics. In addition, one sample was collected for semivolatile organics and pesticides/PCB analysis. As this was not part of the required testing program in the Work Plan, duplicates, field blanks, MS/MSDs and data validation of these samples were not performed. The results of the samples from SP-1 collected on August 13th and 14 are presented on Table 5, page 2 thru 5. The EPA collected "split" samples from SD-1 through SD-3 and from SP-1. NYSDEC collected "split" samples from SD-1 and SP-1.

3.4 Quantities Removed and Disposal Facilities Utilized for this Project

A total of 8,840 gallons of storm water were removed from the storm drians on August 6th and 7th. All storm water removed during this removal action was transported and disposed of at Suffolk County's Bergen Point wastewater treatment plant. Manifests were not required for this water as it is not a hazardous waste.

Soils exhibiting elevated levels of cyanide were transported and disposed of at LWD, Inc. in Calvert City, Kentucky. The top 3 feet of soil from SP-1 and the top 1 foot of soil from SP-1OF were placed in a separate roll-off container. Also, soils excavated from SP-1 that exhibited pronounced green staining were staged separately and screened for cyanide at a local laboratory. Material demonstrated to be high in cyanide were placed in the separate roll-off container. A total of 11.97 tons of soil was transported to LWD, Inc. on August 11th. The hazardous waste manifests and weight tickets for this material are attached to this report.

All of the remaining material removed during this removal action was transported and disposed of at the Michigan Disposal Facility located in Belleville, Michigan. On August 11th and 12th, 5 truck loads of soil totaling 85.6 tons were disposed of at this facility. On August 19th and 20th an additional 235.8 tons of material was shipped to Michigan. The hazardous waste manifests and weight tickets for this material are attached to this report.

4.0 Conclusions

The EPA and NYSDEC cleanup guidelines for this project were 10 ppm for cadmium, 98 ppm for chromium and 200 ppm for lead with the understanding that the excavations should not be advanced to the point that they threaten the physical integrity of the drainage structures. Based on the field XRF measurements, the laboratory results and on visual observations recorded during this removal operation, the objectives of the removal action have successfully been achieved.

End point samples were collected at the bottom of the leaching pools/storm drains and laboratory analyzed. Aside from the former sanitary leaching pool, SP-1, all measurements were at or below the EPA's and NYSDEC's cleanup guidance levels with the one exception of 16.8 mg/kg cadmium measured at the bottom of SD-3 OF. The field XRF reading for the bottom of this pool, however, was less than 10 mg/kg. In each case, the TCLP results measured in the end point samples were below the regulatory levels. A total of 98 tons of material was removed from these structures during August 7th and 8th and properly disposed of at a permitted disposal facility.

At the location of former sanitary leaching pool, SP-1, the entire concrete structure was excavated and removed from the ground. The removal was continued creating an excavation 20 feet wide and 30 feet deep. During this process, an additional 236 tons of material were removed from the ground. The end point samples collected from the north, south, east and west walls of the excavation were all below the EPA and NYSDEC clean up guidance levels for metals. Volatile organic compounds were analyzed in these samples and were not detected.

The end point sample results from the bottom of the excavation were less than the EPA and NYSDEC guidance levels for chromium and lead. The cadmium levels were 11.4 and 16.7 ppm, just slightly above the guidance level of 10 ppm. The TCLP results from the bottom of the excavation were all below the regulatory levels. Similar to the excavation wall samples, volatile organics were not detected in the bottom end point samples. The semivolatile and pesticide/PCB analysis of this sample revealed 190 (estimated) ug/kg and 1600 ug/kg of phthalate, a common component of laboratory plasticware and 17 ug/kg of methoxychlor, a pesticide. The excavation has since been backfilled with clean fill material and will soon be covered with asphalt.

Based on these findings, we believe that the work required in the Order has been satisfactorily completed and that these structures no longer pose a threat to human health or the environment.

5.0 Certification

"Under penalty of law, I certify that to the best of my knowledge, after appropriate inquiries of all relevant persons involved in the preparation of the report, the information submitted is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

6.0 References

CA RICH, Remedial Investigation Report, Tronic Plating Co. Site, Farmingdale, New York, March, 1992.

7.0 Appendices and all Relevant Documentation

The following documents have been appended to this report.

- o Approval letters from the disposal facilities,
- o Summary tables of laboratory analytical data,
- o Summary tables of XRF measurements, and
- o Copies of hazardous waste manifests.

The laboratory reports and the data validation reports have been forwarded to EPA under separate cover.

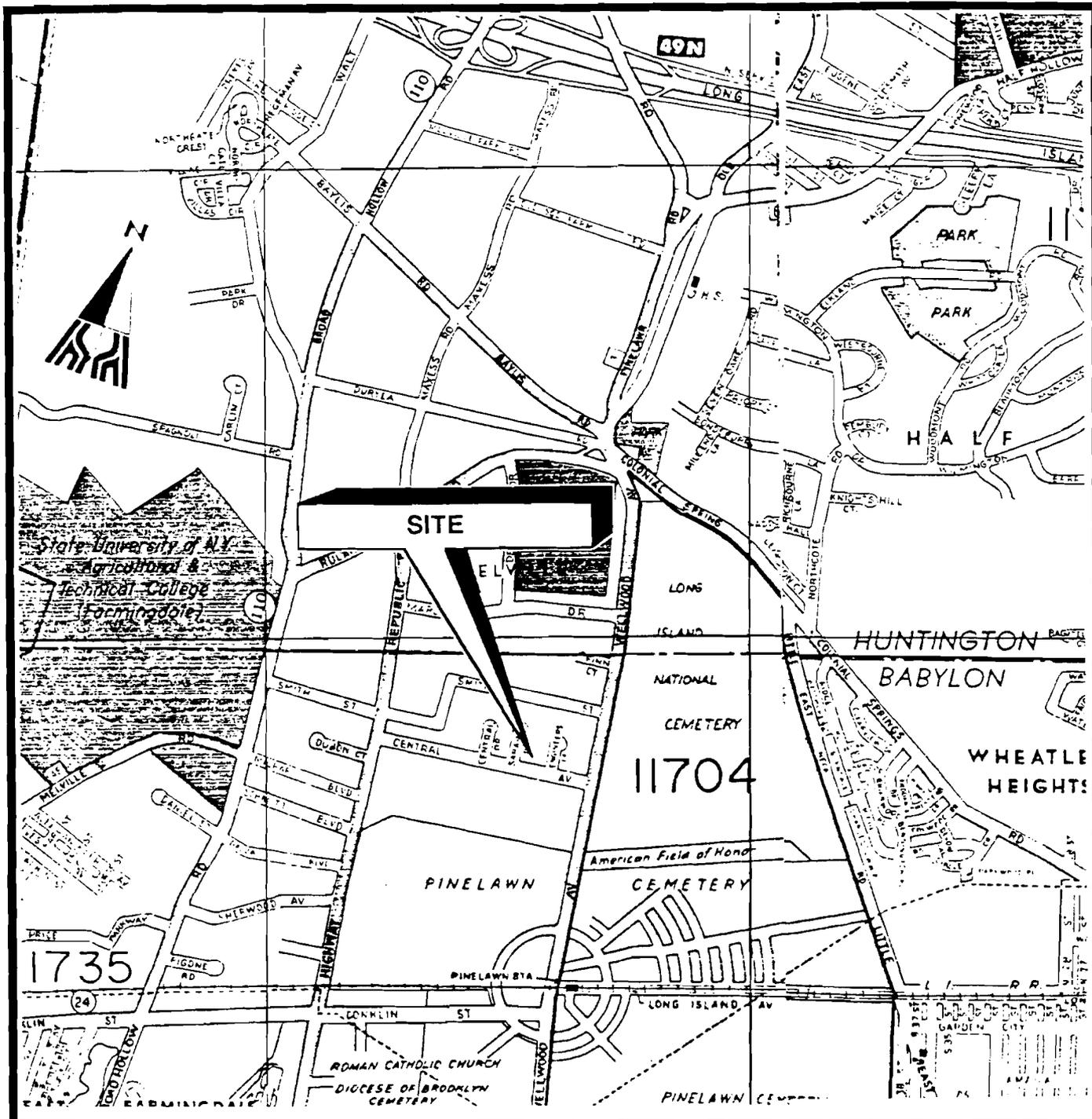


Eric A. Weinstock, CPG, CGWP
Project Manager

9/28/93

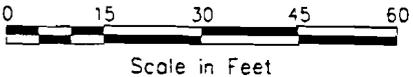
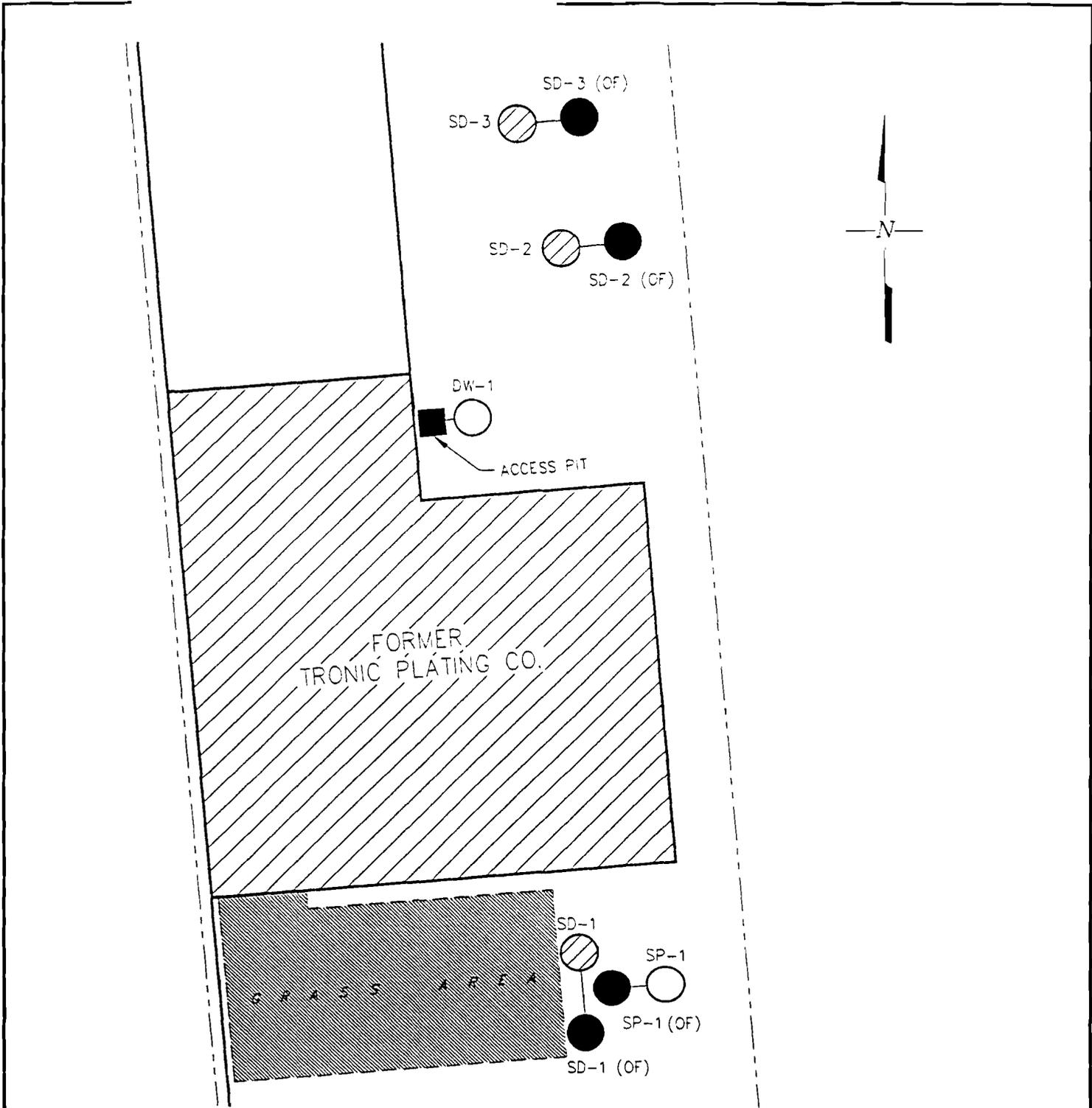
Date

FIGURES



Site Location Map

CA RICH CONSULTANTS, INC. Certified Ground-Water and Environmental Specialists	Tronics Plating Company Site Farmingdale, NY	
	Prepared By: STS	Date: March 1993
404 Glen Cove Avenue, Sea Cliff, N.Y. 11579	Reviewed By: EAW	Figure: 1



LEGEND

-  STORM DRAIN LOCATION
-  STORM DRAIN OVERFLOW POOL LOCATION
-  SANITARY LEACHING POOL LOCATION

CA RICH CONSULTANTS, INC.	
Certified Ground-Water and Environmental Specialists 404 Glen Cove Avenue, Sea Cliff, NY 11579	
TITLE: SITE MAP	
DATE: 3/16/93	
SCALE: AS SHOWN	
FIGURE: 2	DRAWN BY: J.J.S.
DRAWING NO: 13200-AA	TRONIC PLATING CO. SITE FARMINGDALE, NY
	APPR. BY: E.A.W.

TABLES

TABLE 1

**ANALYTICAL RESULTS
STORM WATER SAMPLE
Tronic Plating Company
Farmingdale, New York.**

Page 1 of 4

Sample ID Location Date Units	SD-C Storm Water 17-Jun-93 UG/L	FB-SDW Field Blank 17-Jun-93 UG/L	FB-SDS Field Blank 17-Jun-93 UG/L	TB Trip Blank 17-Jun-93 UG/L
VOLATILES				
Chloromethane	10U	10U	10U	10U
Bromomethane	10U	10U	10U	10U
Vinyl Chloride	10U	10U	10U	10U
Chloroethane	10U	10U	10U	10U
Methylene Chloride	10U	1J	1J	1J
Acetone	27U	360EJ	10UR	10UR
Carbon Disulfide	10U	10U	10U	10U
1,1-Dichloroethene	10U	10U	10U	10U
1,1-Dichloroethane	10U	10U	10U	10U
1,2-Dichloroethene (total)	10U	10U	10U	10U
Chloroform	10U	10U	10U	10U
1,2-Dichloroethane	10U	10U	10U	10U
2-Butanone	10UR	10UR	10UR	10UR
1,1,1-Trichloroethane	10U	10U	10U	10U
Carbon Tetrachloride	10U	10U	10U	10U
Bromodichloromethane	10U	10U	10U	10U
1,2-Dichloropropane	10U	10U	10U	10U
cis-1,3-Dichloropropene	10U	10U	10U	10U
Trichloroethene	10U	10U	10U	10U
Dibromochloromethane	10U	10U	10U	10U
1,1,2-Trichloroethane	10U	10U	10U	10U
Benzene	10U	10U	10U	10U
trans-1,3-Dichloropropene	10U	10U	10U	10U
Bromoform	10U	10U	10U	10U
4-Methyl-2-Pentanone	10U	10U	10U	10U
2-Hexanone	10U	10U	10U	10U
Tetrachloroethene	10U	10U	10U	10U
1,1,1,2-Tetrachloroethane	10U	10U	10U	10U
Toluene	10U	10U	10U	10U
Chlorobenzene	10U	10U	10U	10U
Ethylbenzene	10U	10U	10U	10U
Styrene	10U	10U	10U	10U
Xylene (total)	10UJ	10UJ	10UJ	10UJ
TENTATIVELY IDENTIFIED COMPOUNDS				
Unknown	330JR	820JR	NONE	18J
Unknown	130JR	NONE	NONE	710JR

UG/L-Micrograms per Liter or parts per billion (ppb).

U-This compound should be considered "not detected" since it was detected in a blank at a similar level.

J-Quantitation is approximate due to limitations identified during the quality assurance review (data validation).

UJ-This compound was not detected, the the quatitation limit is probably higher due to a low bias identified during the quality assurance review.

R-Unreliable result - compound may or may not be present in this sample.

E-Indicates an estimated value because of the presence of interference.

TABLE 1 (Cont'd)

**ANALYTICAL RESULTS
STORM WATER SAMPLE
Tronic Plating Company
Farmingdale, New York.**

Page 2 of 4

Sample ID	SD-C	FB-SDW	FB-SDS
Location	Storm Water	Field Blank	Field Blank
Date	17-Jun-93	17-Jun-93	17-Jun-93
Units	UG/L	UG/L	UG/L
SEMI-VOLATILES			
Phenol	10U	10U	10U
bis (2-Chloroethyl) ether	10U	10U	10U
2-Chlorophenol	10U	10U	10U
1,3-Dichlorobenzene	10U	10U	10U
1,4-Dichlorobenzene	10U	10U	10U
1,2-Dichlorobenzene	10U	10U	10U
2-Methylphenol	10U	10U	10U
2,2'-oxybis (1-Chloropropane)	10U	10U	10U
4-Methylphenol	10U	10U	10U
N-Nitroso-di-n-propylamine	10U	10U	10U
Hexachloroethane	10U	10U	10U
Nitrobenzene	10U	10U	10U
Isophorone	10U	10U	10U
2-Nitrophenol	10UJ	10UJ	10U
2,4-dimethylphenol	10U	10U	10U
bis (2-Chloroethoxy) methane	10U	10U	10U
2,4-Dichlorophenol	10U	10U	10U
1,2,4-Trichlorobenzene	10U	10U	10U
Naphthalene	10U	10U	10U
4-Chloroaniline	10U	10U	10U
Hexachlorobutadiene	10U	10U	10UJ
4-Chloro-3-methylphenol	10U	10U	10U
2-Methylnaphthalene	10U	10U	10U
Hexachlorocyclopentadiene	10UJ	10U	10UJ
2,4,6-Trichlorophenol	10U	10U	10U
2,4,5-Trichlorophenol	25U	25U	25U
2-Chloronaphthalene	10U	10U	10U
2-Nitroaniline	25U	25U	25U
Dimethylphthalate	10U	10U	10U
Acenaphthylene	10U	10U	10U
2,6-Dinitrotoluene	10U	10U	10U
3-Nitroaniline	25UJ	25UJ	25U
Acenaphthene	10U	10U	10U
2,4-Dinitrophenol	25UJ	25UJ	25UJ
4-Nitrophenol	25UJ	25UJ	25U
Dibenzofuran	10U	10U	10U
2,4-Dinitrotoluene	10U	10U	10U
Diethylphthalate	10U	10U	10U
4-Chlorophenyl-phenylether	10U	10U	10U
Fluorene	10U	10U	10U
4-Nitroaniline	25UJ	25UJ	25U
4,6,-Dinitro-2-methylphenol	25UR	25UR	25UJ
N-Nitrosodiphenylamine (1)	10U	10U	10U
4-Bromophenyl-phenylether	10U	10U	10U
Hexachlorobenzene	10U	10U	10U
Pentachlorophenol	25UR	25UR	25UR
Phenanthrene	10U	10U	10U
Anthracene	10U	10U	10U
Carbazole	10U	10U	10U
Di-n-butylphthalate	10U	10U	10U
Fluoranthene	10U	10U	10U
Pyrene	10U	10U	10U

TABLE 1 (Cont'd)

ANALYTICAL RESULTS
STORM WATER SAMPLE
Tronic Plating Company
Farmingdale, New York.

Page 3 of 4

Sample ID	SD-C	FB-SDW	FB-SDS
Location	Storm Water	Field Blank	Field Blank
Date	17-Jun-93	17-Jun-93	17-Jun-93
Units	UG/L	UG/L	UG/L
SEMI-VOLATILES (cont.)			
Butylbenzylphthalate	10U	10U	10U
3,3-Dichlorobenzidine	10U	10U	10U
Benzo (a) anthracene	10U	10U	10U
Chrysene	10U	10U	10U
bis (2-Ethylhexyl) phthalate	10U	6J	4J
Di-n-octylphthalate	10U	10U	10U
Benzo (b) fluoranthene	10U	10U	10U
Benzo (k) fluoranthene	10U	10U	10U
Benzo (a) pyrene	10U	10U	10U
Indeno (1,2,3-cd) pyrene	10U	10U	10U
Dibenz (a,h) anthracene	10UJ	10UJ	10U
Benzo (g,h,i) perylene	10U	10U	10U
TENTATIVELY IDENTIFIED COMPOUNDS			
2-Pentanone, 4-hydroxy-4-met	6U	7J	5J
Cyclohexanone	2U	-	-
Diethyl benzene isomer	17U	-	-
Diethyl benzene isomer	12U	-	-
Benzene, 1,2-diethyl-	-	7J	-
Benzene, 1-ethyl-2,3-dimethy	-	3J	-
Cyclopentasiloxane, decameth	-	-	2JR
4,9-Decadien-2-amine, N-butyl	-	-	7J
Phosphine oxide, triphenyl-	-	-	6J
unknown	3J	-	4J
unknown	5J	-	6J
unknown	3J	-	-
METALS (Total)			
Arsenic	2.6U	2.6U	2.6U
Barium	11U	0.94B	2.1B
Cadmium	6.2	3.3U	3.3U
Chromium	9.7U	9.7U	9.7U
Copper	N/A	N/A	2.6U
Lead	6.9	1.8J	2.1
Mercury	0.20U	0.20U	0.20U
Selenium	2.0UJ	2.0U	2.0U
Silver	4.4U	4.4U	4.4U
Zinc	N/A	N/A	27.4

Table 1 (Continued)
ANALYTICAL RESULTS
DRY WELL #1
Tronic Plating Company
Farmingdale, New York.

Page 4 of 4

Sample ID	DW-1	DW-1
Depth (feet)	(5to6)	(12-14)
Date	23-Jul-93	17-Jun-93
Units	mg/kg	mg/Kg
Parameter		
METALS		
Cadmium	1.0 B	19.1
Chromium	3.8	22.9
Lead	39.6	16.6
Total Cyanide	<1.1	N/A

mg/Kg-Milligrams per Kilogram or parts per million (ppm).

TABLE 2

**SUMMARY OF EXCAVATIONS FROM STORM DRAIN & LEACHING POOLS
PERFORMED ON AUGUST 7 & 8, 1993**

Tronic Plating Company
Farmingdale, New York.

Pool Identification	SD-1	SD-1 (OF)	SD-2	SD-2 (OF)	SD-3	SD-3 (OF)	SP-1	SP-1(OFF)	DW-1
Initial depth from top of concrete ring	11 ft.	13 ft.	10.5 ft.	7.5 ft.	15.5 ft.	10.5 ft.	9 ft. 11 ft.*	12 ft.	13 ft.
Final depth from top of concrete ring	14 ft.	17 ft.	15.5 ft.	10.5 ft.	19 ft.	15.5 ft.	16.5 ft.*	17.5 ft.	20.5 ft.
Feet of soil removed	3 ft.	4 ft.	5.5 ft.	3 ft.	4.5 ft.	5 ft.	5.5 ft.	5.5 ft.	7.5 ft.
Approximate volume of soil removed from pool	5.5 cu. yds.	7.5 cu. yds.	10 cu. yds.	5.5 cu. yds.	8.25 cu. yds.	9.24 cu. yds.	10 cu. yds.	10 cu. yds.	14 cu. yds.
Depth of final XRF sample	14 ft.	17 ft.	15.5 ft.	10.5 ft.	19.5 ft.	15.5 ft.	16.5 ft. **	17.5 ft.	20.5 ft.
XRF Measurements (ppm)									
Cadmium	<10	<10	<10	<10	<10	<10	25	11	<10
Chromium	<10	<10	11	<10	66	<10	430	66	28
Lead	20	<10	<10	40	<10	<10	35	<10	<10

* - Measured from grade.

** - Additional soil removed on August 13 and 14, 1993.

(OF) - Indicates Over-Flow pool.

TABLE 3

SUMMARY OF XRF FIELD MEASUREMENTS FROM STORM DRAINS & LEACHING POOLS

**Tronic Plating Company
Farmingdale, New York.**

SAMPLE LOCATION	DEPTH (feet)	CADMIUM (ppm)	CHROMIUM (ppm)	LEAD (ppm)
SD-1	14	<10	<10	20
SD-1(OFF)	17	<10	<10	<10
SD-2	15.5	<10	11	<10
SD-2 (OFF)	10.5	<10	<10	<10
SD-3	19	11	37	<10
	19.5	<10	66	<10
SD-3 (OFF)	15.5	<10	<10	<10
SP-1	11	150	17000	1000
	16	21	320	43
	16.5	25	430	35
SP-1 (OFF)	15	12	10	10
	17.5	11	66	<10
DW-1	15.5	290	<10	<10
	20.5	<10	28	<10

ppm - parts per million.

(OFF) - Indicates Over-Flow pool.

TABLE 4

**ANALYTICAL RESULTS FOR METALS ANALYSIS
STORM DRAIN & LEACHING POOL BOTTOM SEDIMENTS COLLECTED ON AUGUST 7 & 8, 1993**

Tronic Plating Company
Farmingdale, New York.

Sample ID	SD-1	SD-1 (OF)	SD-2	SD-2 (OF)	SD-3	SD-3 (OF)	SP-1	SP-2 (DUP)*	SP-1(OFF)	DW-1	FIELD BLK.
Depth	14 feet	16 feet	15.5 feet	10.5 feet	19 feet	15.5 feet	16.5 feet	16.5 feet	17.5 feet	20.5 feet	N/A
Date	7-Aug-93	7-Aug-93	7-Aug-93	7-Aug-93	8-Aug-93	7-Aug-93	8-Aug-93	8-Aug-93	8-Aug-93	8-Aug-93	8-Aug-93
Units	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	MG/KG	UG/L
METALS (Total)											
Cadmium	0.54 U	0.53 U	1.5J	0.54 U	0.93J	16.8	12.2	13.7	10.0	4.3	2.6 U
Chromium	1.9 U	1.9 U	2.0 U	2.0 U	2.3	9.5	96.7	108	10.5	17.0	9.4 U
Lead	4.5U	0.88U	1.4U	1.0U	2.6U	23.1	38.6	43.2	1.5U	2.5U	4.8
Cyanide	NT	NT	NT	NT	NT	NT	63.6	61.8	NT	NT	10.0 U

Sample ID	SD-1	SD-1 (OF)	SD-2	SD-2 (OF)	SD-3	SD-3 (OF)	SP-1	SP-2 (DUP)*	SP-1(OFF)	DW-1	TCLP REGULATORY LEVEL
Depth	14 feet	16 feet	15.5 feet	10.5 feet	19 feet	15.5 feet	16.5 feet	16.5 feet	17.5 feet	20.5 feet	
Date	7-Aug-93	7-Aug-93	7-Aug-93	7-Aug-93	8-Aug-93	7-Aug-93	8-Aug-93	8-Aug-93	8-Aug-93	8-Aug-93	
Units	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L
METALS (TCLP)											
Arsenic	2.3 U	2.3 U	2.3 U	2.4 B	2.3 U	2.3 U	2.3 U	2.9 B	2.3 U	2.3 U	5000
Barium	83.4U	82.7 U	89.0 U	99.3 U	95.3 U	125 U	88.4 U	104 U	90.8 U	66.0 U	100000
Cadmium	5.2	3.8U	26.2	4.8 B	19.5	18.8	230	249	348	98.3	1000
Chromium	9.4 UJ	9.4 UJ	9.4 UJ	9.4 UJ	9.4 UJ	9.4 UJ	36.8 J	48.8	18.1 J	9.4 UJ	5000
Lead	13.9	9.8J	6.0 J	4.5 J	15.6	9.5	22.6	24.5	154	16.1	5000
Mercury	0.2 U	0.20 U	0.20 U	0.20 U	0.20 U	0.20 U	0.20 U	0.20 U	0.20 U	0.20 U	200
Selenium	1.6 UJ	1.8 J	2.5 J	1.6 UJ	2.3 J	2.6 J	2.1 J	3.4 J	1.6 J	1.6 UJ	1000
Silver	2.8 B	5.6 B	2.7 U	2.7 U	2.7 B	4.9 B	46.7	55.4	3.7 B	3.5 B	5000

(OF)-Storm drain over-flow.

MG/KG-Milligrams per Kilograms (Dry Weight) or parts per million (ppm).

UG/L-Micrograms per Liter or parts per billion (ppb).

U-This analyte should be considered "not detected" since it was detected in a blank at a similar level.

J-Quantitation is approximate due to limitations identified during the quality assurance review (data validation)

the presence of a compound below the reportable detection limit but greater than zero.

UJ-This analyte was not detected, but the quantitation limit is probably higher due to a low bias identified during the quality assurance review.

R-Unreliable result - analyte may or may not be present in this sample.

B-Indicates that the analyte was found in both the sample and its associated laboratory blank.

* - SP-2 (DUP) is a duplicate sample of SP-1.

NT - Not Tested.

TABLE 5

SUMMARY OF ANALYTICAL RESULTS-AUGUST 13th & 14th
Excavation of Former Leaching Pool SP-1
Tronic Plating Company
Farmingdale, New York.

Page 1 of 5

Sample ID	SP-1N	SP-1S	SP-1E	SP-1W
Location	North	South	East	West
Depth	10 ft	12 ft	10 ft	9 ft
Date	14-Aug-93	14-Aug-93	14-Aug-93	14-Aug-93
VOLATILES (ug/Kg)				
Chloromethane	12U	11U	10U	10U
Bromomethane	12U	11U	10U	10U
Vinyl Chloride	12U	11U	10U	10U
Chloroethane	12U	11U	10U	10U
Methylene Chloride	12U	11U	10U	10U
Acetone	12U	11U	10U	12U
Carbon Disulfide	12U	11U	10U	10U
1,1-Dichloroethene	12U	11U	10U	10U
1,1-Dichloroethane	12U	11U	10U	10U
1,2-Dichloroethene (total)	12U	11U	10U	10U
Chloroform	12U	11U	10U	10U
1,2-Dichloroethane	12U	11U	10U	10U
2-Butanone	12UJ	11UJ	10UJ	10UJ
1,1,1-Trichloroethane	12U	11U	10U	10U
Carbon Tetrachloride	12U	11U	10U	10U
Bromodichloromethane	12U	11U	10U	10U
1,2-Dichloropropane	12U	11U	10U	10U
cis-1,3-Dichloropropene	12U	11U	10U	10U
Trichloroethene	12U	11U	10U	10U
Dibromochloromethane	12U	11U	10U	10U
1,1,2-Trichloroethane	12U	11U	10U	10U
Benzene	12U	11U	10U	10U
trans-1,3-Dichloropropene	12U	11U	10U	10U
Bromoform	12U	11U	10U	10U
4-Methyl-2-Pentanone	12U	11U	10U	10U
2-Hexanone	12UJ	11UJ	10UJ	10UJ
Tetrachloroethene	12U	11U	10U	10U
1,1,2,2-Tetrachloroethane	12U	11U	10U	10U
Toluene	12U	11U	10U	10U
Chlorobenzene	12U	11U	10U	10U
Ethylbenzene	12U	11U	10U	10U
Styrene	12U	11U	10U	10U
Xylene (total)	12U	11U	10U	10U
TENTATIVELY IDENTIFIED COMPOUNDS (ug/Kg)				
2-Propanol, 1-chloro	-	6JR	-	-
Unknown	-	-	7J	-
METALS (mg/Kg)				
Cadmium	0.93U	0.57U	0.54U	0.53U
Chromium	2.2UJ	2.1UJ	2.0UJ	1.9UJ
Cyanide	1.2U	1.1U	1.0U	0.97U
Lead	0.48U	1.4U	3.2J	0.22UJ

ug/Kg-Micrograms per Kilogram or parts per billion (ppb).

mg/Kg-Milligrams per kilogram or parts per million (ppm).

U-This analyte should be considered "not detected" since it was detected in a blank at a similar level.

J-Quantitation is approximate due to limitations identified during the quality assurance review (data validation).

UJ-This analyte was not detected, but the quantitation limit is probably higher due to a low bias identified in the quality assurance review.

R-Unreliable result - Analyte may or may not be present in this sample.

TABLE 5 (Cont'd)

SUMMARY OF ANALYTICAL RESULTS-AUGUST 13th & 14th
Excavation of Former Leaching Pool SP-1
Tronic Plating Company
Farmingdale, New York.

Page 2 of 5

Sample ID	SP-1(30)	SP-2(30)	Field Blank
Location	Bottom	Bottom	
Date	14-Aug-93	14-Aug-93	14-Aug-93
Depth	30ft	30ft	
Units	mg/Kg	mg/Kg	ug/L
METALS (Total)			
Aluminum	596	276	47.7B
Antimony	0.98B	0.65B	2.5U
Arsenic	1.1B	1.4B	2.3U
Barium	5.2U	6.0U	1.3B
Beryllium	0.15U	0.17U	0.70U
Cadmium	16.7	11.4	6.7
Calcium	168U	574B	208B
Chromium	63.0	44.2	9.4UJ
Cobalt	2.0U	2.3U	9.5U
Copper	16.7	12.9	7.2B
Iron	1080	473	5.3U
Lead	9.7J	7.7J	2.5B
Magnesium	129B	40.7B	40.5B
Manganese	9.7J	5.5J	0.78B
Mercury	0.04U	0.05U	0.20U
Nickel	2.0B	2.2B	7.4U
Potassium	101B	20.9U	72.7B
Selenium	0.57U	0.75U	2.4B
Silver	1.7J	1.1J	2.7U
Sodium	10.1U	85.9U	1640B
Thallium	0.10U	0.12UJ	0.50U
Vanadium	1.2B	1.0B	3.8U
Zinc	3.6U	2.2U	33.0
Cyanide	16.5	15.1	10.0U
			TCLP Regulatory Level
TCLP METALS (ug/L)			
Arsenic	2.3U	2.3U	5000
Barium	102U	79.3U	100000
Cadmium	231	190	1000
Chromium	36.7J	25.3J	5000
Lead	105U	105U	5000
Mercury	0.20U	0.20U	200
Selenium	2.6U	1.6U	1000
Silver	2.7U	2.7U	5000

ug/L-Micrograms per Liter or parts per billion (ppb).

mg/Kg-Milligrams per Kilogram or parts per million (ppm).

U-This analyte should be considered "not detected" since it was detected in a blank at a similar level.

J-Quantitation is approximate due to limitations identified during the quality assurance review (data validation).

UJ-This analyte was not detected, but the quantitation limit is probably higher due to a low bias identified in the quality assurance review.

R-Unreliable result - Analyte may or may not be present in this sample.

B-Indicates that analyte was found in both the sample and its associated laboratory blank.

TABLE 5 (Cont'd)

SUMMARY OF ANALYTICAL RESULTS-AUGUST 13th & 14th
 Excavation of Former Leaching Pool SP-1
 Tronic Plating Company
 Farmingdale, New York.

Sample ID	SP-1(30)	SP-2(30)	Field Blank	Trip Blank
Location	Bottom	Bottom		
Date	14-Aug-93	14-Aug-93	14-Aug-93	14-Aug-93
Depth	30ft	30ft		
Units	ug/Kg	ug/Kg	ug/L	ug/L
VOLATILES				
Chloromethane	10U	12U	10U	10U
Bromomethane	10UJ	12UJ	10UJ	10UJ
Vinyl Chloride	10U	12U	10U	10U
Chloroethane	10U	12U	10U	10U
Methylene Chloride	10U	12U	2J	1J
Acetone	12U	20U	9J	11J
Carbon Disulfide	10U	12U	10U	10U
1,1-Dichloroethene	10U	12U	10U	10U
1,1-Dichloroethane	10U	12U	10U	10U
1,2-Dichloroethene (total)	10U	12U	10U	10U
Chloroform	10U	12U	10U	10U
1,2-Dichloroethane	10U	12U	10U	10U
2-Butanone	10UJ	12UJ	10U	10U
1,1,1-Trichloroethane	10U	12U	10U	10U
Carbon Tetrachloride	10U	12U	10U	10U
Bromodichloromethane	10U	12U	10U	10U
1,2-Dichloropropane	10U	12U	10U	10U
cis-1,3-Dichloropropene	10U	12U	10U	10U
Trichloroethene	10U	12U	10U	10U
Dibromochloromethane	10U	12U	10U	10U
1,1,2-Trichloroethane	10U	12U	10U	10U
Benzene	10U	12U	10U	10U
trans-1,3-Dichloropropene	10U	12U	10U	10U
Bromoform	10U	12U	10U	10U
4-Methyl-2-Pentanone	10U	12U	10U	10U
2-Hexanone	10UJ	12UJ	10U	10U
Tetrachloroethene	10U	12U	10U	10U
1,1,2,2-Tetrachloroethane	10U	12U	10U	10U
Toluene	10U	12U	10U	10U
Chlorobenzene	10U	12U	10U	10U
Ethylbenzene	10U	12U	10U	10U
Styrene	10U	12U	10U	10U
Xylene (total)	10U	12U	10U	10U

ug/Kg-Micrograms per Kilogram or parts per billion (ppb).

mg/Kg-Milligrams per kilogram or parts per million (ppm).

U-This analyte should be considered "not detected" since it was detected in a blank at a similar level.

J-Quantitation is approximate due to limitations identified during the quality assurance review (data validation).

UJ-This analyte was not detected, but the quantitation limit is probably higher due to a low bias identified in the quality assurance review.

TABLE 5 (Cont'd)

SUMMARY OF ANALYTICAL RESULTS-AUGUST 13th & 14th
 Excavation of Former Leaching Pool SP-1
 Tronic Plating Company
 Farmingdale, New York.

Sample ID	SP-1(30)	SP-2(30)
Location	Bottom	Bottom
Date	14-Jun-93	14-Jun-93
Depth	30ft	30ft
TCLP VOLATILES (ug/L)		
Benzene	10U	10U
Carbon Tetrachloride	10U	10U
Chlorobenzene	10U	10U
1,2-Dichloroethane	10U	10U
1,1-Dichloroethylene	10U	10U
2-Butanone	10UR	10UR
Tetrachloroethylene	10U	10U
Trichloroethylene	10U	10U
Chloroform	10U	10U
Vinyl Chloride	10U	10U
TENTATIVELY IDENTIFIED COMPOUNDS (ug/L)		
Unknown	610JR	-
Unknown	-	620JR

ug/L-Micrograms per Liter or parts per billion (ppb).

mg/Kg-Milligrams per Kilogram or parts per million (ppm).

U-This analyte should be considered "not detected"since it was detected in a blank at a similar level.

J-Quantitation is approximate due to limitations identified during the quality assurance review (data validation).

UJ-This analyte was not detected, but the quantitation limit is probably higher due to a low bias identified in the quality assurance review.

R-Unreliable result - Analyte may or may not be present in this sample.

TABLE 5 (Cont'd)

SUMMARY OF ANALYTICAL RESULTS-AUGUST 13th & 14th
Excavation of Former Leaching Pool SP-1
Tronic Plating Company
Farmingdale, New York.

Sample ID	SP-1(30)	Sample ID	SP-1(30)
Location	Bottom	Location	Bottom
Date	14-Aug-93	Date	14-Aug-93
Depth	30ft	Depth	30ft
Units	ug/kg	Units	ug/kg
SEMI-VOLATILES		SEMI-VOLATILES (cont'd)	
Phenol	350U	Anthracene	350U
bis (-2-Chloroethyl) ether	350U	Di-n-butylphthalate	1600
2-Chlorophenol	350U	Fluoranthene	350U
1,3-Dichlorobenzene	350U	Pyrene	350U
1,4-Dichlorobenzene	350U	Butylbenzylphthalate	350U
Benzyl alcohol	350U	3,3-Dichlorobenzidine	700U
1,2-Dichlorobenzene	350U	Benzo (a) anthracene	350U
2-Methylphenol	350U	Chrysene	350U
bis (2-chloroisopropyl)ether	350U	bis (2-Ethylhexyl) phthalate	190J
4-Methylphenol	350U	Di-n-octylphthalate	350U
N-Nitroso-di-n-propylamine	350U	Benzo (b) fluoranthene	350U
Hexachloroethane	350U	Benzo (k) fluoranthene	350U
Nitrobenzene	350U	Benzo (a) pyrene	350U
Isophorone	350U	Indeno (1,2,3-cd) pyrene	350U
2-Nitrophenol	350U	Dibenz (a,h) anthracene	350U
2,4-dimethylphenol	350U	Benzo (g,h,i) perylene	350U
Benzoic acid	1750U	4-Nitroaniline	1750U
Bis (2-Chloroethoxy) methane	350U		
2,4-Dichlorophenol	350U	PESTICIDES	
1,2,4-Trichlorobenzene	350U	Units	ug/Kg
Naphthalene	350U	alph-BHC	1.7U
4-Chloroaniline	350U	beta-BHC	1.7U
Hexachlorobutadiene	350U	delta-BHC	1.7U
4-Chloro-3-methylphenol	350U	gamma-BHC (Lindane)	1.7U
2-Methylnaphthalene	350U	Heptachlor	1.7U
Hexachlorocyclopentadiene	350U	Aldrin	1.7U
2,4,6-Trichlorophenol	350U	Heptachlor epoxide	1.7U
2,4,5-Trichlorophenol	1750U	Endosulfan I	1.7U
2-Chloronaphthalene	350U	Dieldrin	3.5U
2-Nitroaniline	1750U	4,4'-DDE	3.5U
Dimethylphthalate	350U	Endrin	3.5U
Acenaphthylene	350U	Endosulfan sulfate	3.5U
2,6-Dinitrotoluene	350U	4,4'-DDT	3.5U
3-Nitroaniline	1750U	Methoxychlor	17
Acenaphthene	350U	Endrin Aldehyde	3.5U
2,4-Dinitrophenol	1750U	gamma-Chlordane	1.7U
4-Nitrophenol	1750U	alpha-Chlordane	1.7U
Dibenzofuran	350U	Toxaphene	173U
2,4-Dinitrotoluene	350U		
Diethylphthalate	350U	PCB's (ug/Kg)	
4-Chlorophenyl-phenylether	350U	Arochlor-1016	35U
Fluorene	350U	Arochlor-1221	35U
4,6,-Dinitro-2-methylphenol	1750U	Arochlor-1232	35U
N-Nitrosodiphenylamine (1)	350U	Arochlor-1242	35U
4-Bromophenyl-phenylether	350U	Arochlor-1248	35U
Hexachlorobenzene	350U	Arochlor-1254	35U
Pentachlorophenol	1750U	Arochlor-1260	35U
Phenanthrene	350U		

ug/Kg-Micrograms per Kilogram or parts per billion (ppb).

U-Indicates not detected at or above reportable detection limits.

This data has not been subjected to quality assurance data validation review.

**WASTE
FACILITY
APPROVALS**

CA RICH CONSULTANTS, INC.

Certified Ground-Water and Environmental Specialists

August 9, 1993

U.S.EPA
26 Federal Plaza
New York, New York 10278

Attention: Gloria Sosa, Project Manager

Re: Waste Shipments
Tronic Plating Co. Site
Farmingdale, New York

Dear Ms. Sosa:

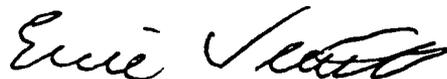
Attached to this letter are copies of the waste disposal approvals for the above-referenced site. Please notify the environmental agencies of Kentucky and Michigan of our intent to ship these waste materials.

Storm water has been shipped to the SCDPW's wastewater treatment plant at Bergen Point, New York as per our approval. We intend to send approximately 5 to 10 cubic yards of cyanide-tainted waste material to LWD, Inc. in Calvert City, Kentucky. The remaining material, approximately 80 cubic yards to date, will be shipped to Michigan/Wayne Disposal, Inc. in Belleville, Michigan.

In accordance with item 73 of the order (page 16), please notify the appropriate agencies in Kentucky and Michigan of our intent to send these waste materials from the Tronic Plating Co. Superfund site to these respective states. Thank you.

Sincerely,

CA RICH CONSULTANTS, INC.



Eric A. Weinstock
Project Manager



LWD, INC.

P.O. BOX 327 • CALVERT CITY, KENTUCKY 42029

August 6, 1993

Mr. Mike Flynn
Direct Environmental
66-B Otis Street
West Babylon, NY 11704

Dear Mr. Flynn:

RE: APPROVAL OF REQUEST FOR TREATMENT SURVEY(S)

Thank you for considering LWD, Inc.'s (LWD) services for your wastes. Our price quotes are attached to this letter.

LWD has permits for and will accept the materials as referenced on the approved "Request for Treatment Survey Form" (attached).

LWD uses a coding system which enables us to schedule and track your waste through our plant. Your waste materials have been given a unique four digit LWD product code number (PC#). The PC# assigned to the waste stream is shown in the attachments and will be used as the reference for all future inquiries, shipment scheduling, manifesting, drum marking, load reconciliation, or other correspondence concerning that waste stream.

To schedule your material please contact our dispatcher at 502/395-8313. At that time you will need to give him your PC# and the amount to be disposed.

Please use the PC# to reference the waste stream when consigning to LWD for treatment. The attached sample sheet illustrates the procedures for drum marking and manifesting using the example PC#. A letter regarding DOT regulations is attached for your reference.

Thank you for your help and cooperation.

Sincerely,

Allan R. Orth

Allan R. Orth

ARO:ljh

Attachments



LWD, INC.

P.O. BOX 327 - CALVERT CITY, KENTUCKY 42029

EXHIBIT A PRICE QUOTATION

DATE: August 6, 1993

GENERATOR NAME
& ADDRESS:

Commerce Holding Co., Inc.
Central Ave. Units 162-168
Farmingdale, NY 11735

CUSTOMER NAME
& ADDRESS:

Direct Environmental
66-B Otis Street
West Babylon, NY 11704

EPA I.D. #: NYD982188385

TRANSPORTATION:

TREATMENT: All materials offered for treatment

X as warranted in the Request for Treatment Survey forms.

PC#	WASTE STREAM COMMON NAME
KP26	Soil

*PRICE BASED ON ANALYSIS OF SAMPLE RECEIVED

COUNTY OF SUFFOLK



JUL 27 1993

ROBERT J. GAFFNEY
SUFFOLK COUNTY EXECUTIVE

DEPARTMENT OF PUBLIC WORKS

STEPHEN G. HAYDUK, P.E.
COMMISSIONER

July 26, 1993

Mr. Steve Plofker
Direct Environmental Inc.
66-B Otis Street
West Babylon, NY 11704Re: Acceptability of Waste
Multi-Occupied - 162 thru 168 Central Ave.
Farminqdale

Dear Mr. Plofker:

This is written in response to your 10 June 93 request to dispose of the contents of the storm drains south and east of the above-referenced building at the County's Bergen Point facility.

Based on analysis of samples collected at our 17 June 93 inspection it has been determined the material is acceptable for disposal.

Feel free to call if you have any questions.

Very truly yours,

Robert N. Falk
Permit Administrator

RF:cs

cc: R. Carballeira
R. Strzepak

ENVOTECH®

MANAGEMENT SERVICES, INCORPORATED

Environmental Protection Facility
49350 North I-54 Service Drive
Belleville, Michigan 48111
(313) 687-7690

Date 08/09/93

Approval Number: 080693 MC

COMMERCE HOLDING COMPANY
CENTRAL AVE. UNIT 162-188

FARMINGDALE NY 11735
Attn: ERIC WENSTOCK

Re: Waste disposal at ENVOTECH MANAGEMENT SERVICES,
EPA Identification Number MID000724821

Dear Sir/Madam,

This letter acknowledges the acceptability of the waste described below and that Michigan/Wayne Disposal, Inc. has the appropriate permit(s) for Treatment at our Belleville, Michigan facility.

1. General Description:
SOIL/SLUDGE
2. EPA Waste Code: F006
Additional Waste Type:
F007, F008, D004
3. Generator EPA Identification Number: NYD002059517
4. Please refer to our approval number 080693 MC when shipping or making any inquiries about the waste stream

PLEASE NOTE: This approval is based on information supplied to us by your company. As the Generator you are responsible for the accuracy of the characterization information. If there are any errors or changes to this information please notify us immediately. Contact your transporter or broker to schedule the delivery of your waste. All waste shipments must be scheduled prior to shipping.

If you have any questions, please do not hesitate to call us at 1-800-368-6835.


Approval Coordinator

**WASTE
DISPOSAL
MANIFESTS**



8/14

L W D , INC.

P.O. BOX 327 - CALVERT CITY, KENTUCKY 42029

Date 8-16-93

Customer: Commerce Holdings (FCI) KP-96

Address: _____

Type Waste: Liquid _____ Solid Size Load: _____ Gal _____ Cu. Ft. _____ #

Hauled By: L W D _____ Other - Truck No. 413

Total Weight 66540 lbs Pumping _____ Time in: _____

Truck Weight 42600 lbs Loading Drums _____ Time out: _____

Net Weight 23940 lbs Overpacks _____

NYB586493-1
WASTE RUN TICKET

26503

Customer's Signature [Signature]

L W D Signature Russell Shrum

23,940 lbs
÷ 2,000
11.97 Tons

DNR
MICHIGAN DEPARTMENT
OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
 ATT. DIS. REJ. PR.

Regulated under authority of the Clean Air Act, as amended and Act 136 PA 1969.
 Regulated under authority of the Clean Water Act, as amended and Act 136 PA 1969.
 Regulated under authority of the Resource Conservation and Recovery Act, as amended and Act 136 PA 1969.

Form Approved OMB No. 2060-0066 Expires 6-30-84

File to print or type:

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No. MI D 10 0 12 0 15 19 5 1 17		Manifest Document No. 19083	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.				
3. Generator's Name and Mailing Address Commerce Holding Co., Inc., c/o Direct Environmental, Inc. 666 6th Street, West Nyack, NY 10994 P.O. Box 672, Hicksville, New York 11702					A. State Manifest Document Number MI 3040083					
4. Generator's Phone 7516 674-3889					B. State Generator's ID Central Ave., Unit 162-163, Farmingdale, NY					
5. Transporter 1 Company Name Freehold Cities, Inc.			6. US EPA ID Number NY D 0 15 1 1 2 6 1 6 4		C. State Transporter's ID NY 151430					
7. Transporter 2 Company Name			8. US EPA ID Number		D. Transporter's Phone 516-462-1001					
8. Designated Facility Name and Site Address Envotech Management Services, Inc. 49350 N. I-94 Service Drive Belleville, MI 48111					E. State Transporter's ID					
9. US EPA ID Number MI D 10 0 10 1 7 2 1 4 8 3 1					F. Transporter's Phone					
10. US EPA ID Number					G. State Facility's ID					
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER)					12. Containers No. Type		13. Total Quantity	14. Unit Wt/Vol	15. Waste No.	16. HM
a. I HQ, Hazardous Waste, Solid, n.o.s., (Cadmium), 9, RA3077, III (D006, F006, F007, F008).					0101 CM 0100112		Y	F006	6	H
b.										
c.										
d.										
11. Additional Descriptions for Materials Listed Above 11a. F006 contaminated soil APPROVAL CODE 080693MC add'l codes: D006, F007, F008					K. Handling Codes for Wastes Listed Above			a/L / b/L / c/L / d/L /		
15. Special Handling Instructions and Additional Information Emergency Contact:					Section Ka per NY regulations. 11a. Use RC 131. 12741					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.										
Printed/Typed Name Eric De... Signature Eric De...					Date Month Day Year 10/12/87			Date Month Day Year 10/12/87		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Date Month Day Year					Date Month Day Year			Date Month Day Year		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Date Month Day Year					Date Month Day Year			Date Month Day Year		
19. Discrepancy Indication Space 8A TS ab										
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name Signature Date Month Day Year					Date Month Day Year			Date Month Day Year		

ALL APPLICANTS MUST BE REFERRED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM BY MICHIGAN AT 513-373-7400 AND THE NATIONAL RESPONSE CENTER AT (800) 424-9300 24 HOURS PER DAY

CUSTOMER COPY

ENVOTECH
SERVICE BUREAU
1349 HURON
Ypsilanti, Michigan 48197

Office: (313)483-6464
I-94 Landfill: (313)697-7830

SURCHARGE APPLIED
WRITTEN BY: TB DATE: 8/12/93

ACCT. NAME: ENVIRONMENTAL WASTE TECHNOLOGY

ACCOUNT NUMBER: 332 SHORT NAME: ENWATK

CODE: F006 - Y - QUANTITY: 12

Approval # - B0693-NC

REMARKS: EFAW NYD002039517
COMMERCE HOLDING COMPANY
Manifest # M13040083
Hauler FCI
Time In: 9:29 AM Time Out: 6:07 PM
G- 81,100 T- 43,260 N- 37,840

I understand and acknowledge that entry is permitted only at my own risk, both personally and on behalf of my employer release Wayne Disposal, Inc. and/or Michigan Disposal, Inc. from any and all liability not caused by its gross negligence or willful misconduct.

Ticket # 127411

DELIVERED BY

NO SALVAGING ON PREMISES

Gross	-	81,100	lbs
Truck	-	43,260	lbs
Net	-	37,840	lbs
	÷	2,000	

18.92 Tons

DNR
MICHIGAN DEPARTMENT
OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
 ATT. DIS. FEJ. PR.

617 332 5712/10/11
 Required under authority of Act 47, P.A. 1979, as amended and Act 306, P.A. 1989.
 Figure 10 fee is payable under section 206 of MCL or Section 10 of Act 306, P.A. 1989.

Please print or type. Form Approved OMB No. 2050-0039 Expires 6-80-4

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. **NY D10101205195117**
 Manifest Document No. **412882**

2. Page 1 of 1
 Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Commerce Holding Co., Inc., c/o Direct Environmental, Inc.
~~66 E. Oak Street West Babylon, NY 11784~~
P.O. Box 672 Hicksville, N.Y. 11802

A. State Manifest Document Number
MI 3040082
 B. State Generator's ID Control No. and Date
Date 162-168, Farmingdale, NY

4. Generator's Phone (516) **674-3889**
 5. Transporter 1 Company Name
Freehold Waste Inc.
 6. US EPA ID Number
NY D10101541126164

C. State Transporter's ID
XT51XA
 D. Transporter's Phone
908-462-1001

7. Designated Facility Name and Site Address
Envotach Management Services, Inc.
49350 N. I-94 Service Drive
Belleville, MI 48111
 8. US EPA ID Number
MI D1010101712418311

E. State Transporter's ID
5277D
 F. Transporter's Phone
908-462-1001
 G. State Facility's ID
313-697-7830

9. US DOT Description (including Proper Shipping Name, Hazard Class, and HM)

12. Containers
 13. Total Quantity
 14. Unit
 1. Waste No. NH

No.	Type	Quantity	Unit	Waste No.	NH
a. X	M, Hazardous Waste, Solid, n.o.s., (Cadmium), 9, RA3077, III (D006, F006, P007, F008).	01011	CM	01010112	7 P 0 0 6 B
b.					
c.					
d.					

No.	Type	Quantity	Unit	Waste No.	NH

10. Additional Descriptions for Materials Listed Above
 11a. F006 contaminated soil APPROVAL CODE G80695MC
 add'l codes: D006, P007, F008
12734

11. Handling Codes for Wastes Listed Above
 a/L /
 b / /
 c / /
 d / /

15. Special Handling Instructions and Additional Information
Emergency Contact: Section 1a per NY regulations. 11a. Use ERG #31.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
 If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to maximize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: **Eric W. [Signature]** Signature: **[Signature]** Date: **Month Day Year**

17. Transporter 1 Acknowledgement of Receipt of Materials
 Printed/Typed Name: **Todd Gibson** Signature: **[Signature]** Date: **Month Day Year**

18. Transporter 2 Acknowledgement of Receipt of Materials
 Printed/Typed Name: **Robert Mazzo** Signature: **[Signature]** Date: **Month Day Year**

19. Discrepancy Indication Space
GA TS ab

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
 Printed/Typed Name: **Thomas B...** Signature: **[Signature]** Date: **Month Day Year**

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN, AT 800-252-4706 OR OUT OF STATE AT 313-773-7340 AND THE NATIONAL RESPONSE CENTER AT 800-424-6343 24 HOURS PER DAY

CUSTOMER COPY

ENVOTECH
SERVICES INC.
1349 HURON
Ann Arbor, Michigan 48107

Office: (313)485-6464
I-94 Landfill (313)697-7800

SURCHARGE APPLIED
WRITTEN BY: WRP DATE: 8/12/93

ACCT. NAME: ENVIRONMENTAL WASTE TECHNOLOGY

ACCOUNT NUMBER: 332 SHORT NAME: ENWATK

CODE: F006 - Y - QUANTITY: 12
Approval # 30693-MC

REMARKS: EPA# NY5002059517
COMMERCE HOLDING COMPANY
Mentest # M13040082
Hauler FCI
Time In 9:28 AM Time Out 2:42 PM
G- 75,440 T- 37,700 N- 37,740

I understand and acknowledge that entry is permitted only at my own risk. I, both personally and on behalf of my employer release Wayne Disposal, Inc. and/or Michigan Disposal, Inc. from any and all liability not caused by its gross negligence or willful misconduct.

Ticket # 127324

DELIVERED BY

NO SALVAGING ON PREMISES

Gross - 75,440 lbs

Truck - 37,700 lbs

Net - 37,740 lbs

÷ 2,000

18.87 Tons

CUSTOMER COPY

ENVUTECH
SERVICES INC.

1349 HURON

Ypsilanti, Michigan 48197

Office: (313)485-6464

I-94 Landfill (313)697-7630

CHARGE APPLIED

WRITTEN BY: JDB

DATE: 8/13/93

ACCT.

NAME: ENVIRONMENTAL WASTE TECHNOLOGY

ACCOUNT NUMBER: 332 SHORT NAME: ENWATH

CODE: F006 - Y - QUANTITY: 12

Approval # B0693-MC

REMARKS: EPA# NYD002059517
COMMERCE HOLDING COMPANY
Manifest # M12449235
Hauler FCI
Time In 3:01 PM Time Out 3:55 PM
G- 63,180 T- 39,220 N- 23,960

I understand and acknowledge that entry is permitted only at my own risk, both personally and on behalf of my employer release Wayne Disposal, Inc. and/or Michigan Disposal, Inc. from any and all liability not caused by its gross negligence or willful misconduct.

Ticket # 127485

DELIVERED BY

NO SALVAGING ON PREMISES

Gross - 63,180 lbs

Truck - 39,220 lbs

Net - 23,960 lbs

÷ 2,000

11.98 Tons

DNR
MICHIGAN DEPARTMENT
OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
 ATT. D.S. REJ. PR.

DEF. USE OF THIS FORM IS
 Required under authority of Act 46, PA
 1979, as amended and Act 136, PA
 1968.
 Failure to file a purchase order
 section 255348 MCL of Section 10 of
 Act 136, PA, 1968.

Please print or type.

Form Approved OMB No. 203-0030 Expires 6-30-81

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MI D 0 0 1 2 0 1 5 9 1 5 1 1 7	Manifest Document No. 70085	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Commerce Holding Co., Inc., c/o Street Environmental, Inc., c/o State Street, West Troy, NY 12196 P.O. Box 672, West Troy, NY 12196			A. State Manifest Document Number MI 3040085		B. State Generator's ID MI 162-168, Farmington, NY
4. Generator's Phone 516 674-3889			C. State Transporter's ID NY 215 WJ		D. Transporter's Phone 909 762-1001
5. Transporter 1 Company Name FRENOLD CARTAGE, INC.			6. US EPA ID Number NY D 0 5 4 1 2 6 1 6 4		E. State Transporter's ID NY 215 WJ
7. Transporter 2 Company Name FRENOLD CARTAGE, INC.			8. US EPA ID Number NY D 0 5 4 1 2 6 1 6 4		F. Transporter's Phone 909 462-1001
9. Designated Facility Name and Site Address Envotech Management Services, Inc. 49350 N. I-94 Service Drive Belleville, MI 48111			10. US EPA ID Number MI D 0 1 0 1 0 7 2 4 8 3 1 1		G. State Facility's ID H. Facility's Phone 313-697-7830
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and HM ID NUMBER)			12. Containers No.	13. Total Quantity	14. Unit Wt/Vol
a. X RQ, Hazardous Waste, Solid, n.o.s. (Cadmium), 9, NA3077, III (D006, P006, F007, F008).			0101	CM 0101112	Y PIG 016 R
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above 11a. P006 contaminated soil APPROVAL CODE 080693RC add'l codes: D006, F007, F008 127018			K. Handling Codes for Wastes Listed Above		b/L / b/ / c/ / d/ /
15. Special Handling Instructions and Additional Information Emergency Contact: 1-800-628-6091			Section Ks per NY regulations. 11a. Use RC #31.		
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR: if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. as per our exclusive handling					
Printed/Typed Name Eric W. Jendryak			Signature Eric W. Jendryak		Date 01/12/78
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Dave Froese			Signature Dave Froese		Date 12/10/93
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Joseph F. Baerke Jr			Signature Joseph F. Baerke Jr		Date 12/10/93
19. Discrepancy Indication Space MW 8A					
20. Facility Owner or Operator, Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name Thomas Burx			Signature Thomas Burx		Date 12/10/93

ALL SALS MUST BE AFFIXED TO THE MICHIGAN POLLUTION EMERGENCY ALERT/NO SYSTEM, IN MICHIGAN AT 1-800-250-4700 OR OUT OF STATE AT 313-373-5100 AND THE NATIONAL RESPONSE CENTER AT 800-424-9319 24 HOURS PER DAY.

CUSTOMER COPY

ENVOTECH
SERVICES INC.
1349 HURON
Ypsilanti, Michigan 48197

Office: (313)485-6464
I-94 Landfill (313)697-7830

SURCHARGE APPLIED

WRITTEN BY: TB DATE: 2/17/93

ACCT. NAME: ENVIRONMENTAL WASTE TECHNOLOGY

ACCOUNT NUMBER: 332 SHORT NAME: ENWATK

CODE: F006 - Y - QUANTITY: 12

Approval # B0693-MC

REMARKS: EPA# NYD002059517
COMMERCE HOLDING COMPANY
Manifest # M13040085
Hauler FCI
Time In 7:31 AM Time Out 9:04 AM
G- 71,320 T- 33,840 N- 37,480

I understand and acknowledge that entry is permitted only at my own risk, I, both personally and on behalf of my employer release Wayne Disposal, Inc. and/or Michigan Disposal, Inc. from any and all liability not caused by its gross negligence or willful misconduct.

Ticket # 127618

DELIVERED BY

NO SALVAGING ON PREMISES

Gross - 71,320 lbs

Truck - 33,840 lbs

Net - 37,480 lbs

÷ 2,000

18.74 Tons

DNR
MICHIGAN DEPARTMENT
OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
 ATT. DIS. REJ. PR.

017 002 0112-011
 Acquired under authority of Act 94, PA
 1978, as amended and Act 136, PA
 1989.
 Failure to file is punishable under
 section 290.54a MCL or Section 10 of
 Act 138, PA, 1989.

Form Approved, OMB No. 2030-0038 Expires 6-30-9

Please print or type.

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No. **MI D 0 0 2 0 5 9 5 1 0 1 9 0 0 8 8**
 Manifest No. **190088**

2. Page 1 of 1
 Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Commerce Holding Co., Inc., c/o Direct Environmental, Inc.
~~66 P. O. Box 692, Hicksville, New York 11704~~
P.O. Box 692, Hicksville, New York 11802

A. State Manifest Document Number
MI 3040086

B. State Generator's ID
Central Ave., Unit: 262-268, Farmingdale, NY

5. Transporter 1 Company Name
Freshhold Garage, Inc.

6. US EPA ID Number
MI D 0 1 5 4 1 2 6 1 6 4

C. State Transporter's ID
XP 51 XA

D. Transporter's Phone
908-462-1001

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

5. Designated Facility Name and Site Address
Envotech Management Services, Inc.
49350 N. I-94 Service Drive
Belleville, MI 48111

10. US EPA ID Number
MI D 1 0 1 0 1 7 1 2 1 4 1 8 1 3 1 1

G. State Facility's ID

H. Facility's Phone
313-697-7830

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).
 HM

12. Containers No. Type
 13. Total Quantity
 14. Unit Wt/Vol
 15. Waste No.
 16. NIH

a. **X** **RQ, Hazardous Waste, Solid, n.o.s., (Cadmium), 9, RA3077, III (2006, P006, Y007, R008):**

0 1 0 1 C H 0 1 0 0 1 1 2 Y T 0 0 5 4

b.
 c.
 d.

J. Additional Descriptions for Materials Listed Above
 11a. **P006 contaminated soil APPROVAL CODE 080693MC**
add'l codes: D006, Y007, R008
127628

K. Handling Codes for Wastes Listed Above
a1
b1
c1
d1

15. Special Handling Instructions and Additional Information
Emergency Contact: **Section Ia per NY regulations. 11a. Use HRC 431.**

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name **Eric W. ...** Signature **Eric W. ...** Date **10/1/88**

17. Transporter 1 Acknowledgement of Receipt of Materials
 Printed/Typed Name **Tom Gibson** Signature **Tom Gibson** Date **09/17/88**

18. Transporter 2 Acknowledgement of Receipt of Materials
 Printed/Typed Name _____ Signature _____ Date _____

19. Discrepancy Indication Space
MW 8A

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
 Printed/Typed Name **Thomas Boush** Signature **Thomas Boush** Date _____

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-252-4708 OR OUT OF STATE AT 811-373-7862 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-9331 24 HOURS PER DAY.

CUSTOMER COPY:

ENVOTECH
SERVICES INC.
1349 HURON
Ypsilanti, Michigan 48197

Office: (313)485-6464
I-94 Landfill (313)697-7830

SURCHARGE APPLIED
WRITTEN BY: TB DATE: 6/17/93

ACCT.
NAME: ENVIRONMENTAL WASTE TECHNOLOGY

ACCOUNT NUMBER: 332 SHORT NAME: ENWATK

CODE: F006 - Y - QUANTITY: 12

Approval # 80693-MC

REMARKS: EPA# NYD002059317
COMMERCE HOLDING COMPANY
Manifest # MI3040086
Hauler FCI
Time in 10:38 AM Time Out 11:37 AM
G- 73,700 T- 39,540 N- 34,160

I understand and acknowledge that entry is permitted only at my own risk, both personally and on behalf of my employer release Wayne Disposal, Inc. and/or Michigan Disposal, Inc. from any and all liability not caused by its gross negligence or willful misconduct.

Ticket # 127628

DELIVERED BY

NO SALVAGING ON PREMISES

Gross - 73,700 lbs

Truck - 39,540 lbs

Net - 34,160 lbs

÷ 2,000

17.08 Tons

DNR MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE ATT. [] DIS. [] REJ. [] PR. []

Required under authority of Act 66, PA 1978, as amended and Act 138, PA 1969

Failure to file is punishable under section 299 548 MCL or Section 10 of Act 136, PA 1969

Please print or type

Form Approved OMB No 2050-0039 Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST

Generator's US EPA ID No NY 0000205051171 Manifest Document No 90033

2 Page 1 of 1 Information in the shaded areas is not required by Federal law

3 Generator's Name and Mailing Address Commerce Holding Co., Inc. P.O. Box 672, Hicksville, NY 11802

A. State Manifest Document Number MI 3040033

4 Generator's Phone (516) 674-3889

B. State Generator's ID Central Ave., Unit 162-168, Farmingdale, NY

5 Transporter 1 Company Name Hewlett Packard US EPA ID Number 035519

C. State Transporter's ID NY 14550

7 Transporter 2 Company Name US EPA ID Number

D. Transporter's Phone 607-20-9007

9 Designated Facility Name and Site Address Envotech Management Services, Inc. 49350 N. I-94 Service Drive Belleville, MI 48111 US EPA ID Number MI 10010107214831

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone 313-697-7830

11 US DOT Description (including Proper Shipping Name, Hazard Class, and HM ID NUMBER) X RQ, Hazardous Waste, Solid, n.o.s., (Cadmium), 9, NA3077, 111 (D006, F006, F007, F008).

Table with 5 columns: 12 Containers No., 13. Total Quantity, 14. Unit Wt/Vol, 1. Waste No., N/M. Row 1: 0101, CIM, 01010112, Y, F10106, H

11a. F006 contaminated soil APPROVAL CODE 08069JMC add'l codes: D006, F007, F008

Table with 4 columns: a/L, b, c, d. Row 1: /, /, /, /

16 Special Handling Instructions and Additional Information Emergency Contact: Section Ka per NY regulations. 11a. Use ERC #31.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway... Eric Weinstein

17 Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name: MARCUS... Signature: Marcus... Date: 08/20/92

18 Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name: ... Signature: ... Date: 08/20/92

19 Discrepancy Indication Space

20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19 Printed/Typed Name: ... Signature: ... Date: 08/20/92

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM BY MICHIGAN AT 1-800-292-4742 OR OUT OF STATE AT 517-373-7666 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-6802 24 HOURS PER DAY.

E.W.T. INC. 12003-005
-1532 Sep 1, 93 22:04 No. 016 P. 04
CUSTOMER COPY

ENVOTECH
SERVICES INC.
1349 HURON
Ypsilanti, Michigan 48197

Offices: (313) 483-6464
I-94 Landfill: (313) 697-7830

SURCHARGE APPLIED
WRITTEN BY: TB DATE: 8/24/93

ACCT. NAME: ENVIRONMENTAL WASTE TECHNOLOGY

ACCOUNT NUMBER: 332 SHORT NAME: ENWATK

CODE: F006 - Y. - QUANTITY: 12

Approval # 80693-MC

REMARKS: EPA# NYD002059517
COMMERCE HOLDING COMPANY
Manifest # M12040033
Hauler FCI
Time In 7:24 AM Time Out 8:48 AM
G= 95,340 T= 33,460 N= 61,880

I understand and acknowledge that entry is permitted only at my own risk. I, both personally and on behalf of my employer (please Wayne Disposal, Inc. and/or Michigan Disposal, Inc.) from any and all liability not caused by its gross negligence or willful misconduct.

Ticket # 128005
DELIVERED BY _____

NO SALVAGING ON PREMISES

Gross - 95,340 lbs
Truck - 33,460 lbs

Net - 61,880 lbs
÷ 2,000

30.94 Tons

DNR MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE ATT. DIS. REJ. PR.

Required under authority of Act No. 215 of 1979, as amended and Act 136, PA 1969. Failure to file is punishable under Section 209 546 MCL or Section 10 of Act 136 PA 1969.

Form Approved OMB No. 2050-0039 Expires 9/30/90

Please print or type

UNIFORM HAZARDOUS WASTE MANIFEST form with sections for generator information, transporter information, waste description, and facility information.

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-252-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-9807 24 HOURS PER DAY

GENERATOR TRANSPORTER

CUSTOMER COPY

ENVOTECH
SERVICES INC.
1342 HURON
Ypsilanti, Michigan 48197

Office: (313) 485-6464
Home: (313) 697-7830

CHARGE APPLIED
WRITTEN BY TD DATE 8/24/93

ACCT NAME ENVIRONMENTAL WASTE TECHNOLOGY

ACCOUNT NUMBER 998 9-09* NAME ENWATK

CODE FOOD - Y QUANTITY 12

ADDRESS 1342 HURON
PERMITS (CPM NY0002059517
COMMERCE HOLDING COMPANY
Manifest # ME3040037
Hauler FCJ
Time In 11:27 AM Time Out 12:08 PM
G- 86,720 L- 43,960 N- 42,760

I understand and acknowledge that entry is permitted only in my own risk & bulk personally and on behalf of my employer unless Wayne Disposal, Inc. and/or Michigan Disposal, Inc. from any and all liability not caused by its gross negligence or willful misconduct.

Ticket # 128018 DELIVERED BY

NO SALVAGING ON PREMISES

Gross 86,720 lbs
Truck 43,960 lbs

Net 42,760 lbs
÷ 2,000

21.38 TONS

ENVOTECH
SERVICES INC.
1349 HURON
Ypsilanti, Michigan 48197

Office: (313) 405-6824
I-94 Landfill (313) 697-7850

SURCHARGE APPLIED
WRITTEN BY: TD DATE: 8/28/83

ACCT. NAME: ENVIRONMENTAL WASTE TECHNOLOGY

ACCOUNT NUMBER: 332 SHOT NAME: BUNNYS

CODE: F006 - Y - QUANTITY: 12

Approval # 80623-MC

REMARKS: EPAM NYD002059517
COMMERCE HOLDING COMPANY
Manifest # MI3046094
Hauler FCI
Time In 7:29 AM Time Out 9:23 AM
G- 88,860 Y- 32,680 N- 55,580

I understand and acknowledge that entry is permitted only at my own risk, I, both personally and on behalf of my employer release Wayne Disposal, Inc. and/or Michigan Disposal, Inc. from any and all liability not caused by its gross negligence or willful misconduct.

Ticket # 127954
DELIVERED BY

NO SALVAGING ON PREMISES

Gross - 88,860 lbs

Truck - 32,680 lbs

Net - 55,580 lbs

÷ 2,000

27.79 Tons

DNR MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE ATT. [] DIS. [] REJ. [] PR. []

Required under authority of Act of P. 1979 as amended and Act 136 PA 1969

Failure to file is punishable under section 268 548 MCL or Section 10 of Act 136 PA 1969

Form Approved OMB No. 2050-0039 Expires 9-30-

March 1990 of 1990

UNIFORM HAZARDOUS WASTE MANIFEST

Generator's US EPA ID No. Manifest Document No. Page 1 of 1 Information in the shaded areas is not required by Federal law

3 Generator's Name and Mailing Address: Commerce Holding Co., Inc. P.O. Box 672, Hicksville, NY 11802

A. State Manifest Document Number: MI 3040035 B. State Generator's ID: Central Ave. Unit 162-168, Farmingdale, NY

4 Generator's Phone (516) 674-3889

5 Transporter 1 Company Name: Horizon Trucks

6 US EPA ID Number: PADICK 1410357119

C. State Transporter's ID: 211040

7 Transporter 2 Company Name

8 US EPA ID Number

D. Transporter's Phone: 800-20-860 E. State Transporter's ID

9 Designated Facility Name and Site Address: Envotech Management Services, Inc. 49350 N. I-94 Service Drive Belleville, MI 48111

10 US EPA ID Number: MITE000071248311

F. State Facility's ID G. State Facility's ID H. Facility's Phone: 313-697-7830

11 US DOT Description (including Proper Shipping Name, Hazard Class, and HM ID NUMBER)

12 Containers No. Type 13 Total Quantity 14 Unit Vol. 15 Waste No. 16

a. X RQ, Hazardous Waste, Solid, n.o.s., (Cadmium), 9, NA3077, 111 (D006, F006, F007, F008).

01011 CIM 01010112 Y P 01016 H

J. Additional Descriptions for Materials Listed Above

11a. F006 contaminated soil APPROVAL CODE: 08U693MC add'l codes: D006, F007, F008

K. Handling Codes for Wastes Listed Above: a/L / b/ / c/ / d/ /

15 Special Handling Instructions and Additional Information

Emergency Contact:

Section Ka per NY regulations. 11a. Use ERG #31.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this shipment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated in the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford

Printed/Typed Name: Eric Weinstein

Signature: Eric Weinstein

Date: 08/12/93

17 Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Michael Cornick

Signature: Michael J. Cornick

Date: 10/8/93

18 Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

19. Discrepancy Indication Space

20 Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest except as noted in item 19

Printed/Typed Name

Signature

Date

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8807 24 HOURS PER DAY

E.W.T. INC.

UN2,005

32

Sep 1.93 22:04 No.016 P.05

DELIVERED BY

ENVUTECH SERVICES INC.
1349 HUKON
Ypsilanti, Michigan 48197

Office: (313)485-6464
I-94 Landfill (313)697-7830

SURCHARGE APPLIED
WRITTEN BY: TB DATE: 8/23/93

ACCT NAME: ENVIRONMENTAL WASTE TECHNOLOGY

ACCOUNT NUMBER: 332 SHORT NAME: ENWATK

CODE: F006 - Y - QUANTITY: 12

APPROVAL # 80693-MC

REMARKS: EPA# NYD002059517

COMMERCE HOLDING COMPANY

Manifest # MI3040035

Hauler: FCI

Time In 11:58 AM Time Out 1:25 PM

G- 87,880 T- 34,340 N- 53,480

I understand and acknowledge that only to permit only at my own risk, I, both personally and on behalf of my employer release Wayne Disposal, Inc. and/or Michigan Disposal, Inc. from any and all liability not caused by its gross negligence or willful misconduct.

Ticket # 127969

DELIVERED BY

NO SALVAGING ON PREMISES

Gross 87,880 lbs

Traut 34,340 lbs

Net 53,480 lbs

÷ 2,000

26.77 Tons

DNR MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE ATT. [] DIS. [] REJ. [] PR. []

Required under authority of Act 64, PA 1979, as amended and Act 136, PA, 1969

Failure to file is punishable under section 206 546 MCL or Section 10 of Act 136, PA 1969

Please print or type

Form Approved OMB No. 2050 (609) Expires 8-30-

UNIFORM HAZARDOUS WASTE MANIFEST

Generator's US EPA ID No.

Manifest Document No.

Page 1 of 1

Information in the shaded areas is not required by Federal law

NY1010101210151911121

00145

3 Generator's Name and Mailing Address: Commerce Holding Co., Inc. P.O. Box 672, Hicksville, NY 11802

A. State Manifest Document Number: MI 3040032

4 Generator's Phone: 516 1674-3889

B. State Generator's ID: Central Ave. Unit 162-168, Farmingdale, NY

5 Transporter 1 Company Name: Accountants

6 US EPA ID Number: PA 0351817

C. State Transporter's ID: TV-4658

7 Transporter 2 Company Name:

8 US EPA ID Number:

D. Transporter's Phone: 800-720-9000

9 Designated Facility Name and Site Address: Envotech Management Services, Inc. 49350 N. 1-94 Service Drive Belleville, MI 48111

10 US EPA ID Number: MI11D101010171214181311

E. State Transporter's ID:

F. Transporter's Phone:

G. State Facility's ID:

H. Facility's Phone: 313-697-7830

11 US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER):

Table with columns: 12 Containers (No., Type), 13 Total Quantity, 14 Unit (M/Vol), 15 Waste No., 16 NF. Row a: X, RQ, Hazardous Waste, Solid, n.o.s., (Cadmium), 9, NA3077, III (D006, F006, F007, F008). 01011 CIM 01010112 Y F1016

a X RQ, Hazardous Waste, Solid, n.o.s., (Cadmium), 9, NA3077, III (D006, F006, F007, F008).

J. Additional Descriptions for Materials Listed Above: 11a. F006 contaminated soil APPROVAL CODE 080693MC add'l codes: D006, F007, F008

K. Handling Codes for Wastes Listed Above: a/L / b/ / c/ / d/ /

15. Special Handling Instructions and Additional Information: Emergency Contact:

Section Ka per NY regulations. 11a. Use ERC #31.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes its present and future threat to human health and the environment. If I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

As Agent for Commerce Holding Co., Inc. Printed/Typed Name: Signature: Date: 08/24/92

17 Transporter 1 Acknowledgement of Receipt of Materials: Printed/Typed Name: Signature: Date: 08/24/92

18 Transporter 2 Acknowledgement of Receipt of Materials: Printed/Typed Name: Signature: Date:

19 Discrepancy Indication Space

20 Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest except as noted in item 19

Printed/Typed Name: Signature: Date: Month Day

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-252-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-224-6467 24 HOURS PER DAY

08/02/93 10:01 2817 332 8712

Wayne Disposal/Lab

TEL No.313-699-15

ENVOTECH
SERVICES INC.
1349 HURON
Ypsilanti, Michigan 48197

Office: (313)485-6464
T-94 Landfill (313)697-7830

CHARGE APPLIED
WRITTEN BY: TR DATE: 8/23/93

ACCT. NAME: ENVIRONMENTAL WASTE TECHNOLOGY

ACCOUNT NUMBER: 33R SHORT NAME: ENWATK

CODE: F006 - Y - QUANTITY: 12

Approval # 80693-MC

REMARKS: EPA# NYD002059517
COMMERCE HOLDING COMPANY
Manifest # M13040032
Hauler FCI
Time In 12:31 PM Time Out 1:29 PM
G- 78,380 Y- 32,560 N- 45,820

I understand and acknowledge that entry is permitted only at my own risk. I, both personally and on behalf of my employer release Wayne Disposal, Inc. and/or Michigan Disposal, Inc. from any and all liability not caused by its gross negligence or willful misconduct.

Ticket # 127970

DELIVERED BY

NO SALVAGING ON PREMISES

Gross - 78,380 lbs

Truck - 32,560 lbs

Net - 45,820 lbs

÷ 2,000

22.91 Tons

DNR MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE ATT. [] DIS [] REJ. [] PR. []

Required under authority of Act 64 PA 1979 as amended and Act 136 PA 1969

Failure to file is punishable under section 299 54B MCL or Section 10 of Act 136 PA 1969

Firm Approved OMB No. 2050 0039 Expires 9 30-84

Please print or type

UNIFORM HAZARDOUS WASTE MANIFEST

Generator's US EPA ID No NY110101021015191511717200517 Manifest Document No 7200517

2 Page 1 of 1 Information in the shaded areas is not required by Federal law

3 Generator's Name and Mailing Address Commerce Holding Co., Inc. P.O. Box 672, Hicksville, NY 11802

A. State Manifest Document Number MI 3040039

4 Generator's Phone (516) 674-3889

B. State Generator's ID Central Ave., Unit 162-168, Farmingdale, NY

5 Transporter 1 Company Name Enchold Carriage Inc. 6 US EPA ID Number WED 158/12161764

C. State Transporter's ID XP57XA

7 Transporter 2 Company Name 8 US EPA ID Number

D. Transporter's Phone 903-462-1001

9 Designated Facility Name and Site Address Envotech Management Services, Inc. 49350 N. I-94 Service Drive Belleville, MI 48111 10 US EPA ID Number MI11010101071214181311

E. State Transporter's ID F. Transporter's Phone G. State Facility's ID H. Facility's Phone 313-697-7830

11 US DOT Description (including Proper Shipping Name, Hazard Class, and HM ID NUMBER)

12 Containers No. Type 13 Total Quantity 14 Unit W/Vol 1. Waste No. 2. H/NH

a. X RQ, Hazardous Waste, Solid, n.o.s., (Cadmium), 9, NA3077, III (D006, F006, F007, F008)

0101 CIM 01010112 Y F006 H

J. Additional Descriptions for Materials Listed Above 11a. F006 contaminated soil APPROVAL CODE 080693MC add'l codes: D006, F007, F008

K. Handling Codes for Wastes Listed Above a/L / b/ / c/ / d/ /

15 Special Handling Instructions and Additional Information Emergency Contact: Section Ka per NY regulations. 11a. Use ERG #31.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name Eric Weinstein Signature Date Month Day Year 8/17/83

17 Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Todd Gibson Signature Date Month Day Year 08231983

18 Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Date Month Day Year

19 Discrepancy Indication Space

20 Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name Signature Date Month Day Year

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7860 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-6602 24 HOURS PER DAY.

DUPLICATE COPY

ENVOTECH
SERVICES INC.
1049 HURON
Ypsilanti, Michigan 48197

Office: (313)485-6444
I-94 Landfill (313)677-7830

SURCHARGE APPLIED

WRITTEN BY: TB DATE: 8/30/93

ACCT. NAME: ENVIRONMENTAL WASTE TECHNOLOGY

ACCOUNT NUMBER: 332 CREDIT NAME: ENVHATK

CODE: F006 - Y - QUANTITY: 12
Approval # 80692-MC

REMARKS: EPA# RT0002057317
COMMERCE HOLDING COMPANY
Manifest # M12060029
Hauler FCI
Time In 11:49 AM Time Out 1:24 PM
G= 72,840 T= 39,840 N= 33,600

I understand and acknowledge that entry is permitted only at the own-
er's risk, both personally and on behalf of my employer, release Wayne
Disposal, Inc. and/or Michigan Disposal, Inc. from any and all liability not
caused by its gross negligence or willful misconduct.

TICKET # 100571
DELIVERED BY

NO SALVAGING ON PREMISES

Gross - 72,840 lbs
Truck - 39,840 lbs

Net - 33,600 lbs

÷ 2,000

16.8 Tons



MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE

ATT. DIS. REJ. PR.

Required under authority of Act 64, P.A. 1979, as amended and Act 130, P.A. 1969.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 130, P.A. 1969.

Firm Approved OMB No 2050-0039 Expires 9-30-80

Please print if type

UNIFORM HAZARDOUS WASTE MANIFEST

Generator's US EPA ID No

Manifest Document No

Page 1 of 1

Information in the shaded areas is not required by Federal law.

3 Generator's Name and Mailing Address

Commerce Holding Co., Inc. P.O. Box 672, Hicksville, NY 11802

A. State Manifest Document Number MI 3040040

B. State Generator's ID Central Ave., Unit 162-168, Farmingdale, NY

4 Generator's Phone 1 516 674-3889

5 Transporter 1 Company Name

Frederick Cottage, Inc

6 US EPA ID Number

MI D00693MC

C. State Transporter's ID X251XA

D. Transporter's Phone 908-962-1003

7 Transporter 2 Company Name

8 US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9 Designated Facility Name and Site Address

Envotech Management Services, Inc. 49350 N. I-94 Service Drive Belleville, MI 48111

10 US EPA ID Number

MI ID10101071248311

G. State Facility's ID

H. Facility's Phone

313-697-7830

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER)

X RQ, Hazardous Waste, Solid, n.o.s., (Cadmium), 9, NA3077, III (D006, F006, F007, F008).

12 Containers

No. Type

13 Total Quantity

14 Unit Wt/Vol

1. Waste No.

N/H

01011 CM 01010112 Y F006 H

J. Additional Descriptions for Materials Listed Above

11a. F006 contaminated soil APPROVAL CODE 080693MC add'l codes: D006, F007, F008

K. Handling Codes for Wastes Listed Above

a/L /

b/ /

c/ /

d/ /

15. Special Handling Instructions and Additional Information
Emergency Contact:

Section Ka per NY regulations. 11a. Use ERG #31.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes in present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: A. Amst... Commerce Holding Co. Inc.

Signature

Date: 08/19/79

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Todd Gibson

Signature

Date: 08/19/79

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

18. Discrepancy Indication Space

20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name

Signature

Date

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-252-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-6343 24 HOURS PER DAY

08/02/93 10:02 0017 332 8712
Wayne Disposal/Leb TEL No. 313-699-
CUSTOMER COPY

ENVOTECH
SERVICES INC.
1349 HURON
Ypsilanti, Michigan 48197
Office: (313)485-6464
1-94 Landfill (313)697-7830

CHARGE APPLIED
WRITTEN BY: TB DATE: 8/24/93

ACCT. NAME: ENVIRONMENTAL WASTE TECHNOLOGY
ACCOUNT NUMBER: 332 SHORT NAME: ENWATK

CODE: F006 - Y - QUANTITY: 12
Approval # 80693-MC

REMARKS: EPA# NYD002059517
COMMERCE HOLDING COMPANY
Manifest # MI3040040
Hauler FCI
Time In 10:04 AM Time Out 11:07 AM
G- 81,080 T- 38,700 N- 42,300

I understand and acknowledge that entry is permitted only at my own risk. I, both personally and on behalf of my employer release Wayne Disposal, Inc. and/or Michigan Disposal, Inc. from any and all liability not caused by its gross negligence or willful misconduct.

Ticket # 128016
DELIVERED BY

NO SALVAGING ON PREMISES

Gross - 81,080 lbs
Truck - 38,700 lbs

Net - 42,300 lbs
÷ 2,000

21.19 Tons

DNR
MICHIGAN DEPARTMENT
OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE

ATT. DIS. REJ. PR

Required under authority of Act 136 P.A. 1979, as amended and Act 136 P.A. 1969.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969.

Form Approved OMB No. 2050-0039 Expires 9-30-9

Please print or type

UNIFORM HAZARDOUS WASTE MANIFEST

1 Generator's US EPA ID No
Manifest Document No
NY 10010121015191117 / 7/10/01

2 Page 1 of 1
Information in the shaded areas is not required by Federal law

3 Generator's Name and Mailing Address
Commerce Holding Co., Inc.
P.O. Box 672, Hicksville, NY 11802

A. State Manifest Document Number
MI 3040031

4 Generator's Phone (516) 674-3889

B. State Generator's ID Central Ave.,
Unit 162-168, Farmingdale, NY

5 Transporter 1 Company Name
Fitzgerald Cartage Inc.

C. State Transporter's ID
XO-5109 m

6 Transporter 1 US EPA ID Number
NY 1001015191117

D. Transporter's Phone
908-462-1001

7 Transporter 2 Company Name

E. State Transporter's ID

9 Designated Facility Name and Site Address
Envotech Management Services, Inc.
49350 N. I-94 Service Drive
Belleville, MI 48111

F. Transporter's Phone

10 US EPA ID Number
MI 10010101017121481311

G. State Facility's ID
313-697-7830

11 US DOT Description (including Proper Shipping Name, Hazard Class, and HM ID NUMBER)

12 Containers
13 Total Quantity
14 Unit
15 Waste No. N/H

a X RQ, Hazardous Waste, Solid, n.o.s., (Cadmium), 9, NA3077, III (D006, F006, F007, F008).

0101 CIM 01010112 Y F101016 H

J. Additional Descriptions for Materials Listed Above
11a. F006 contaminated soil APPROVAL CODE 080693MC
add'l codes: D006, F007, F008

K. Handling Codes for Wastes Listed Above
B/L /
b/ /
c/ /
d/ /

15 Special Handling Instructions and Additional Information
Emergency Contact: Section Ka per NY regulations.
11a. Use ERG #31.

16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR: if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.
Asst. Mgr. Commerce Holding Co. Inc.
Printed/Typed Name: ERIC WEINSTECK
Signature: [Signature]
Date: 08/20/01

17 Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Todd Gibson
Signature: [Signature]
Date: 08/20/01

18 Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: [Blank]
Signature: [Blank]
Date: [Blank]

19 Discrepancy Indication Space

20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
Printed/Typed Name: [Blank]
Signature: [Blank]
Date: [Blank]

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM BY MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7860 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-9002 24 HOURS PER DAY

E.W.T. INC.
1532

Sep 1.93 22:04 No.016 P.03

2004.005

CUSTOMER COPY

61

1112

61

ENVOTECH
SERVICES INC.
1347 HURON
Ypsilanti, Michigan 48197

Office: (313)485-6464
1-94 Landfill (313)697-7830

SURCHARGE APPLIED

WRITTEN BY: TB DATE: 8/24/93

ACCT
NAME: ENVIRONMENTAL WASTE TECHNOLOGY

ACCOUNT NUMBER: 332 SHORT NAME: ENWATK

CODE: F006 - Y - QUANTITY: 12

Approval # R0693-MC

REMARKS: EPA# NYD002059517

COMMERCE HOLDING COMPANY

Manifest # M13040031

Hauler FCI

Time In 8:15 AM Time Out 9:26 AM

G- 80,560 T 33,060 N- 47,500

I understand and acknowledge that entry is permitted only at my own risk. I, both personally and on behalf of my employer release Wayne Disposal, Inc. and/or Michigan Disposal, Inc. from any and all liability not caused by the gross negligence or willful misconduct.

Ticket # 128007

DELIVERED BY

NO SALVAGING ON PREMISES

Gross - 80,560 lbs

Truck - 33,060 lbs

Net - 47,500 lbs

÷ 2,000

23.75 Tons

110374

ENVOTECH
SERVICES INC.
1949 HURON
Ypsilanti, Michigan 48197

Office: (313)485-6464
1-94 Landfill (313)697-7830

DISCHARGE APPLIED
WRITENUM: 18 DATE: 8/26/93

ACCT NAME: ENVIRONMENTAL WASTE TECHNOLOGY

ACCOUNT NUMBER: 332 SYOR NAME: ENWATK

CODE: EQ04 - Y QUANTITY: 12

Approval # 100493-MC

REMARKS: EPA# NY0002059517
COMMERCE HOLDING COMPANY
Manifest # R13040038
Hauler: FCS
Time In 10:44 AM Time Out 12:20 PM
G- 82,000 I- 37,100 N- 44,900

I understand and acknowledge that entry is permitted only at my own risk. I, both personally and on behalf of my employer, release Wayne Disposal, Inc. and/or Michigan Disposal, Inc. from any and all liability not caused by its gross negligence or willful misconduct.

Ticket # 12R138

DELIVERED BY

NO SALVAGING ON PREMISES

Gross - 82,000 lbs

Truck - 37,100 lbs

Net - 44,900 lbs

÷ 2,000

22.45

DNR
MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
ATT. DIS. REJ. PR

Required under authority of Act 06 PA 1979 as amended and Act 136 PA 1968

Failure to file is punishable under section 202.546 MCL or Section 10 of Act 136 PA 1968

Form Approved OMB No. 2050-0039 Expires 9-30-94

Please print or type

UNIFORM HAZARDOUS WASTE MANIFEST

1 Generator's US EPA ID No

NY10101012101510151171

Manifest Document No
7007

2 Page 1 of 1

Information in the shaded areas is not required by Federal law

3 Generator's Name and Mailing Address

Commerce Holding Co., Inc.
P.O. Box 672, Hicksville, NY 11802

A. State Manifest Document Number
MI 3040041

B. State Generator's ID Central Ave.,
Unit 162-168, Farmingdale, NY

4 Generator's Phone (516) 674-3889

5 Transporter 1 Company Name

Freehold Cartage, Inc.

6 US EPA ID Number

NY0101511217164

C. State Transporter's ID XN-45WL

D. Transporter's Phone 908-62-101

7 Transporter 2 Company Name

8 US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9 Designated Facility Name and Site Address

Envotech Management Services, Inc.
49350 N. 1-94 Service Drive
Belleville, MI 48111

10 US EPA ID Number

MI1101010171214181311

G. State Facility's ID

H. Facility's Phone

313-697-7830

11. US DOT Description (including Proper Shipping Name, Hazard Class, and HM ID NUMBER)

a. X RQ, Hazardous Waste, Solid, n.o.s., (Cadmium), 9, NA3077, III (D006, F006, F007, F008).

12 Containers No Type

0101 CIM

13. Total Quantity

01010112

14 Unit W/Vol

Y F101016

I. Waste No. NIH

J. Additional Descriptions for Materials Listed Above

11a. F006 contaminated soil APPROVAL CODE 080693MC
add'l codes: D006, F007, F008

K. Handling Codes for Wastes Listed Above

a/l /

b/ /

c/ /

d/ /

15 Special Handling Instructions and Additional Information

Emergency Contact: 1-800-628-8091

Section Ka per NY regulations.

11a. Use ERG #31.

16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

As agent for Commerce Holding Co., Inc.

Printed/Typed Name

Frank Weinstein

Signature

[Signature]

Date
Month Day Year
01/19/93

17 Transporter 1 Acknowledgment of Receipt of Materials

Printed/Typed Name

DAVE FURZEN

Signature

[Signature]

Date
Month Day Year
02/19/93

18 Transporter 2 Acknowledgment of Receipt of Materials

Printed/Typed Name

Signature

Date
Month Day Year

19 Discrepancy Indication Space

20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 18

Printed/Typed Name

Signature

Date
Month Day Year

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-252-4706 OR OUT OF STATE AT 517-373-7800 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-6802 24 HOURS PER DAY

09/02/93 10:02 0017 332 6712
Wayne Disposal/Lab TEL No. 313-695-

CUSTOMER COPY

ENVUTECH
SERVICES INC.
1349 HURON
Ypsilanti, Michigan 48197

Office: (313)405-6464
I-94 Landfill (313)697-7830

SURCHARGE APPLIED
WRITTEN BY: JDB DATE: 8/26/93

ACCT. NAME: ENVIRONMENTAL WASTE TECHNOLOGY

ACCOUNT NUMBER: 332 SHORT NAME: ENVUTECH

CODE: F006 - Y - QUANTITY: 12

Approval # B0693-MC

REMARKS: EPA# NYDC02059517
COMMERCE HOLDING COMPANY
Manifest # M13040041
Hauler FC1
Time In 1:04 PM Time Out 2:06 PM
G- 86,020 I- 42,500 N- 43,520

I understand and acknowledge that entry is permitted only at my own risk. I, both personally and on behalf of my employer release Wayne Disposal, Inc and/or Michigan Disposal, Inc. from any and all liability not caused by its gross negligence or willful misconduct.

Ticket # 128151

DELIVERED BY

NO SALVAGING ON PREMISES

Gross 86,020 lbs
Truck 42,500 lbs

Net 43,520 lbs
÷ 2,000

21.76 Tons

DNR MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE ATT. [] DIS. [] REJ. [] PR []

Required under authority of Act 64, P. 1979 as amended and Act 136, P.A. 1969

Failure to file is punishable under section 299.545 MCL or Section 10 of Act 136, P.A. 1969

Form Approved OMB No 2050-0039 Expires 6-30

Please print or type

UNIFORM HAZARDOUS WASTE MANIFEST

1 Generator's US EPA ID No NY1010101210151951171

2 Page 1 of 1

Information in the shaded areas is not required by Federal law

3 Generator's Name and Mailing Address Commerce Holding Co., Inc. P.O. Box 672, Hicksville, NY 11802

A. State Manifest Document Number MI 3040037

4 Generator's Phone (516) 674-3889

B. State Generator's ID Central Ave. Unit 162-168, Farmingdale, NY

5 Transporter 1 Company Name Freebird Cartage Inc. 6 US EPA ID Number NY1010101210151951171

C. State Transporter's ID NY2009350

7 Transporter 2 Company Name 8 US EPA ID Number

D Transporter's Phone 708-462-1000

9 Designated Facility Name and Site Address Envotech Management Services, Inc. 49350 N. I-94 Service Drive Belleville, MI 48111

E State Transporter's ID

10 US EPA ID Number MI11D101010171214181311

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone 313-697-7830

11. US DOT Description (including Proper Shipping Name, Hazard Class, and HM ID NUMBER)

12 Containers No. Type 13 Total Quantity 14 Unit Wt/Vol 1. Waste No. N/A

a. X RQ. Hazardous Waste, Solid, n.o.s., (Cadmium), 9, NA3077, III (D006, F006, F007, F008).

0101 CIM 0100112 Y F1016 H

b.

c.

d.

J. Additional Descriptions for Materials Listed Above 11a. F006 contaminated soil APPROVAL CODE: 080693MC add'l codes: D006, F007, F008

K. Handling Codes for Wastes Listed Above a/L / b/ / c/ / d/ /

15. Special Handling Instructions and Additional Information Emergency Contact: 1-800-625-6091 Section Ka per NY regulations. 11a. Use ERG #31.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects, in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste-generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name Eric Winstock Signature Date 09/20/91

17 Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Dave Flaxig Signature Date 10/31/91

18 Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Date

19 Discrepancy Indication Space

20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 18 Printed/Typed Name Signature Date

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-392-4706 OR OUT OF STATE AT 517-373-7869 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-6802 24 HOURS PER DAY.

CUSTOMER COPY

ENVOTECH
SERVICES INC.
1349 HURON
Ypsilanti, Michigan 48197

OFFICE: (313) 485-6464
(313) 485-6464 (313) 697-7830

CHARGE APPLIED
WRITTEN BY TO DATE 8/24/93

ACCT NAME ENVIRONMENTAL WASTE TECHNOLOGY

ACCOUNT NUMBER 512 S-OR NAME: ENWATK

CODE F000 - Y QUANTITY 12

ADDRESS 30693-NC

PERMITS EPA NY0002059517

COMMERCE HOLDING COMPANY

Manifest # M13040037

Hauler FCJ

Time In 11:27 AM Time Out 12:08 PM

W- 86,720 T- 43,960 N- 42,760

I understand and acknowledge that entry is permitted only in my own risk, both personally and on behalf of my employer, Waste Disposal, Inc. and/or Michigan Disposal, Inc. from any and all liability not caused by its gross negligence or willful misconduct.

Ticket # 128018 DELIVERED BY

NO SALVAGING ON PREMISES

Gross 86,720 lbs

Truck 43,960 lbs

Net 42,760 lbs

÷ 2,000

21.38 Tons