NUS CORPORATION
A Halliburton Company

PRELIMINARY ASSESSMENT
IBM
EAST FISHKILL, NEW YORK

FIELD INVESTIGATION TEAM ACTIVITIES AT UNCONTROLLED HAZARDOUS SUBSTANCES FACILITIES — ZONE I

NUS CORPORATION
SUPERFUND DIVISION

02-8710-09-PA
REV. 0

PRELIMINARY ASSESSMENT
IBM
EAST FISHKILL, NEW YORK

PREPARED UNDER

TECHNICAL DIRECTIVE DOCUMENT NO. 02-8710-09
CONTRACT NO. 68-01-7346

FOR THE

ENVIRONMENTAL SERVICES DIVISION
U.S. ENVIRONMENTAL PROTECTION AGENCY

NOVEMBER 18, 1987

NUS CORPORATION
SUPERFUND DIVISION

SUBMITTED BY

Pauline Doherty

PAULINE DOHERTY
PROJECT MANAGER

REVIEWED/APPROVED BY

Ronald M Naman

RONALD M. NAMAN
FIT OFFICE MANAGER

NUS CORPORATION
A Halliburton Company

02-8710-09-PA
Rev. 0

POTENTIAL HAZARDOUS WASTE SITE

PRELIMINARY ASSESSMENT

IBM Site Name	NYD000707901 EPA Site ID Number
Route 52 East Fishkill, New York 12533 Address	02-8710-09 TDD Number

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Date of Site Visit: October 23, 1987

SITE DESCRIPTION

IBM is a large active facility located on Route 52 in East Fishkill, Dutchess County, New York. The plant is situated in a flat low-lying area bordered on the north by Route 52 and on the south by Route 84. Areas of wetlands and trees are just east of the site. An unnamed tributary of the Wiccopee Creek is located approximately 0.5 mile west of the site.

IBM began operations at the East Fishkill plant in 1963. The firm is involved in the manufacturing and development of semiconductor devices. IBM is permitted to operate both treatment facilities and storage facilities for hazardous waste. The treatment facilities are comprised of a fluoride/heavy metals treatment plant and an industrial waste treatment/neutralization plant. The hazardous waste storage facilty is comprised of five bulk storage tanks and three container storage areas.

PRIORITY FOR FURTHER ACTION: High ____ Medium ____ No Further Action X

RECOMMENDATIONS

IBM is an active facility that operates with RCRA, SPDES, and air permits. Its treatment, storage, and disposal practices are closely monitored by State and Federal agencies; therefore, further investigation is not recommended.

Prepared by: Pauline Doherty
of NUS Corporation

Date: 11/18/87

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE LOCATION AND INSPECTION INFORMATION

1. IDENTIFICATION
01 STATE 02 SITE NUMBER
NY 0000707901

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)
IBM

02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER
Route 52

03 CITY
East Fishkill

04 STATE | 05 ZIP CODE | 06 COUNTY | 07 COUNTY CODE | 08 CONG DIST.
NY | 12533 | Dutchess | 027 | 21

09 COORDINATES
LATITUDE 41° 32' 36". N LONGITUDE 073° 49' 09". W

10 DIRECTIONS TO SITE (Starting from nearest public road)

Take Route 684 North into Dutchess County. Take exit for Route 52 West. IBM is located off Route 52 in East Fishkill.

III. RESPONSIBLE PARTIES

01 OWNER (if known)
International Business Machines

02 STREET (Business, mailing, residential)
Route 52

03 CITY
East Fishkill

04 STATE | 05 ZIP CODE | 06 TELEPHONE NUMBER
NY | 12533 | (914) 894-7707

07 OPERATOR (if known and different from owner)

08 STREET (Business, mailing, residential)

09 CITY

10 STATE | 11 ZIP CODE | 12 TELEPHONE NUMBER

13 TYPE OF OWNERSHIP (Check one)
X A. PRIVATE ___ B. FEDERAL: _____ (Agency name) ___ C. STATE ___ D. COUNTY ___ E. MUNICIPAL
___ F. OTHER: _____ (Specify) ___ G. UNKNOWN

14. OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

___ A. RCRA 3001 DATE RECEIVED: __/__/__ X B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: 6 /9 / 81
___ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION
X YES DATE: 2 / 3 / 87
___ NO

BY (Check all that apply)
___ A. EPA ___ B. EPA CONTRACTOR X C. STATE ___ D. OTHER CONTRACTOR
___ E. LOCAL HEALTH OFFICIAL ___ F. OTHER: _____ (Specify)

CONTRACTOR NAME(S): _____

02 SITE STATUS (Check one)
X A. ACTIVE ___ B. INACTIVE ___ C. UNKNOWN

03 YEARS OF OPERATION
1963 BEGINNING / Active ENDING Facility ___ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

The major hazardous waste generating operations include the etching, cleaning, and polishing of semiconductors. The primary hazardous wastes are metals, floride compounds, solvents, cyanide, and other inorganic and organic chemicals.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

Testing of the wastes has shown characteristics of ignitability, corrosivity, reactivity, and toxicity. These wastes could potentially affect the environment and population through surface water, soil, and groundwater contamination.

IV. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste information and Part 3 - Description of Hazardous Conditions and Incidents)

___ A. HIGH (Inspection required promptly) ___ B. MEDIUM (Inspection required) ___ C. LOW (Inspection on time available basis) X D. NONE (No further action needed. complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)	03 TELEPHONE NUMBER
Diana Messina	U.S. EPA	(201) 321-6776

04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Pauline Doherty	U.S. EPA	NUS FIT 2	(201) 225-6160	11 / 18/ 87

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES (Check all that apply)

- X A. SOLID
- _ B. POWDER, FINES
- X C. SLUDGE
- _ D. OTHER: _____ (Specify)
- _ E. SLURRY
- X F. LIQUID
- _ G. GAS

02 WASTE QUANTITY AT SITE (Measures of waste quantities must be independent)

TONS Unknown
CUBIC YARDS _____
NO. OF DRUMS _____

03 WASTE CHARACTERISTICS (Check all that apply)

- X A. TOXIC
- X B. CORROSIVE
- _ C. RADIOACTIVE
- _ D. PERSISTENT
- X E. SOLUBLE
- _ F. INFECTIOUS
- X G. FLAMMABLE
- X H. IGNITABLE
- _ I. HIGHLY VOLATILE
- _ J. EXPLOSIVE
- X K. REACTIVE
- X L. INCOMPATIBLE
- _ M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			IBM has RCRA Permit to operate both hazardous waste treatment facilities and hazardous waste storage facility. The storage facility is composed of 5 bulk tanks and 3 container storage areas.
OLW	OILY WASTE			
SOL	SOLVENTS	Unknown		
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS	Unknown		
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS	Unknown		

IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cited CAS Numbers)

CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
MES	Arsenic	7440-38-2	Drum Storage	Unknown	Unknown
MES	Mercury	7439-97-6	Drum Storage	Unknown	Unknown
SOL	Benzene	71-43-2	Drum Storage	Unknown	Unknown
OCC	2-Butanone	78-93-3	Drum Storage	Unknown	Unknown
MES	Cadmium	7440-43-9	Drum Storage	Unknown	Unknown
OCC	Chloromethane	74-87-3	Drum Storage	Unknown	Unknown
OCC	Toluene	108-88-3	Drum Storage	Unknown	Unknown
IOC	Carbon Disulfide	75-15-0	Drum Storage	Unknown	Unknown
OCC	Chlorobenzene	108-90-7	Drum Storage	Unknown	Unknown
OCC	1,2-Dichlorobenzene	95-50-1	Drum Storage	Unknown	Unknown
SOL	Methylene Chloride	75-09-2	Bulk Storage Tanks	Unknown	Unknown
OCC	Nitrobenzene	98-95-3	Drum Storage	Unknown	Unknown
OCC	Phenol	108-95-2	Drum Storage	Unknown	Unknown
OCC	Trichloroethane	71-55-6	Bulk Storage Tanks	Unknown	Unknown
OCC	Tetrachloroethane	79-34-5	Bulk Storage Tanks	Unknowns	Unknown
OCC	Trichloroethene	79-01-6	Bulk Storage Tanks	Unknown	Unknown

V. FEEDSTOCKS (See Appendix for CAS Numbers)

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION (See specific references. e.g., state files, sample analysis, reports)

U.S. Environmental Protection Agency Region 2, RCRA Permit, IBM Corporation, December 13, 1983.

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 X A. GROUNDWATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: Approx. 6,000
02 _ OBSERVED (DATE: _____)
04 NARRATIVE DESCRIPTION
_ POTENTIAL X ALLEGED

A 1981 RCRA inspection report indicated that groundwater monitoring revealed contamination. Groundwater is used in the area as a source of drinking water.

01 X B. SURFACE WATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: 0
02 _ OBSERVED (DATE: _____)
04 NARRATIVE DESCRIPTION
X POTENTIAL _ ALLEGED

There is potential for surface water contamination. However, IBM is permitted to operate waste treatment facilities on site and holds a SPDES Permit. Surface water is not used as a source of drinking water within 3 miles.

01 X C. CONTAMINATION OF AIR
03 POPULATION POTENTIALLY AFFECTED: Approx. 22,000
02 _ OBSERVED (DATE: _____)
04 NARRATIVE DESCRIPTION
X POTENTIAL _ ALLEGED

There is potential for air contamination. IBM handles many volatile chemicals in the manufacturing of semiconductor devices. However, a RCRA inspection conducted on February 5, 1987 indicated that the facility holds an air permit.

01 _ D. FIRE/EXPLOSIVE CONDITIONS
03 POPULATION POTENTIALLY AFFECTED: _____
02 _ OBSERVED (DATE: _____)
04 NARRATIVE DESCRIPTION
_ POTENTIAL _ ALLEGED

There is no potential for fire or explosive conditions. Incompatible compounds are segregated and stored in approved containers.

01 _ E. DIRECT CONTACT
03 POPULATION POTENTIALLY AFFECTED: _____
02 _ OBSERVED (DATE: _____)
04 NARRATIVE DESCRIPTION
_ POTENTIAL _ ALLEGED

There is no potential for direct contact. Although the off-site reconnaissance conducted on October 23, 1987 revealed that the site is not completely fenced, IBM is an active facility and entry is restricted.

01 X F. CONTAMINATION OF SOIL
03 AREA POTENTIALLY AFFECTED: Unknown (ACRES)
02 _ OBSERVED (DATE: _____)
04 NARRATIVE DESCRIPTION
X POTENTIAL _ ALLEGED

In June 1984, 35 gallons of wastewater containing sulfuric acid and ammonium persulfate was released to the ground. Reportedly, contaminated soil was excavated, placed in 60 drums, and disposed of at a secure landfill.

01 X G. DRINKING WATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: Approx. 6,000
02 _ OBSERVED (DATE: _____)
04 NARRATIVE DESCRIPTION
X POTENTIAL _ ALLEGED

A 1981 RCRA inspection report indicated that groundwater monitoring revealed contamination. Groundwater is used in the area as a source of drinking water. There are several community water systems within 3 miles of the site.

01 X H. WORKER EXPOSURE/INJURY
03 WORKERS POTENTIALLY AFFECTED: Unknown
02 _ OBSERVED (DATE: _____)
04 NARRATIVE DESCRIPTION
X POTENTIAL _ ALLEGED

There is potential for worker exposure/injury through direct contact with industrial wastes, contaminated soil, or surface water.

01 X I. POPULATION EXPOSURE/INJURY
03 POPULATION POTENTIALLY AFFECTED: Approx. 22,000
02 _ OBSERVED (DATE: _____)
04 NARRATIVE DESCRIPTION
X POTENTIAL _ ALLEGED

The local population could be exposed to hazardous compounds through the ingestion of contaminated groundwater or the inhalation of potentially contaminated air. Approximately 22,000 people live within 4 miles of the site.

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 X J. DAMAGE TO FLORA 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
04 NARRATIVE DESCRIPTION

There is a potential for damage to flora if contaminants migrated from the site. Nearby plants could be affected by contaminaed surface water and soil.

01 X K. DAMAGE TO FAUNA 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
04 NARRATIVE DESCRIPTION (Include name(s) of species)

There is a potential for damage to fauna if contaminants migrated from the site. Species living nearby could be affected by contaminated surface water or soil.

01 X L. CONTAMINATION OF FOOD CHAIN 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
04 NARRATIVE DESCRIPTION

There is a potential for the contamination of the food chain. Nearby animals could be affected through the ingestion of contaminated water, plants, or smaller species.

01 X M. UNSTABLE CONTAINMENT OF WASTES 02 _ OBSERVED (DATE: _____) _ POTENTIAL X ALLEGED
(Spills/runoff/standing liquids/leaking drums)
03 POPULATION POTENTIALLY AFFECTED: 0 04 NARRATIVE DESCRIPTION

A RCRA inspection conducted on February 5, 1987 revealed that IBM was in violation of its RCRA permit. Two waste storage containers were found to be in poor condition.

01 X N. DAMAGE TO OFFSITE PROPERTY 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
04 NARRATIVE DESCRIPTION

There is potential for damage to off-site property through contaminated surface water or surface runoff. However, IBM operates with RCRA and SPDES permits, and its disposal practices are closely monitored.

01 X O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs 02 _ OBSERVED (DATE: _____) _ POTENTIAL X ALLEGED
04 NARRATIVE DESCRIPTION

Sampling of on-site storm drains, manholes, and sumps in December 1984 showed increased levels of organic compounds. The storm drain system was blocked, and influent was reportedly disposed of off site at SCA Chemical Services.

01 _ P. ILLEGAL/UNAUTHORIZED DUMPING 02 _ OBSERVED (DATE: _____) _ POTENTIAL _ ALLEGED
04 NARRATIVE DESCRIPTION

There is no potential for illegal or unauthorized dumping. IBM is an active facility and entry is restricted.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

No other known, potential, or alleged hazards.

III. TOTAL POPULATION POTENTIALLY AFFECTED: Approximately 22,000

IV. COMMENTS

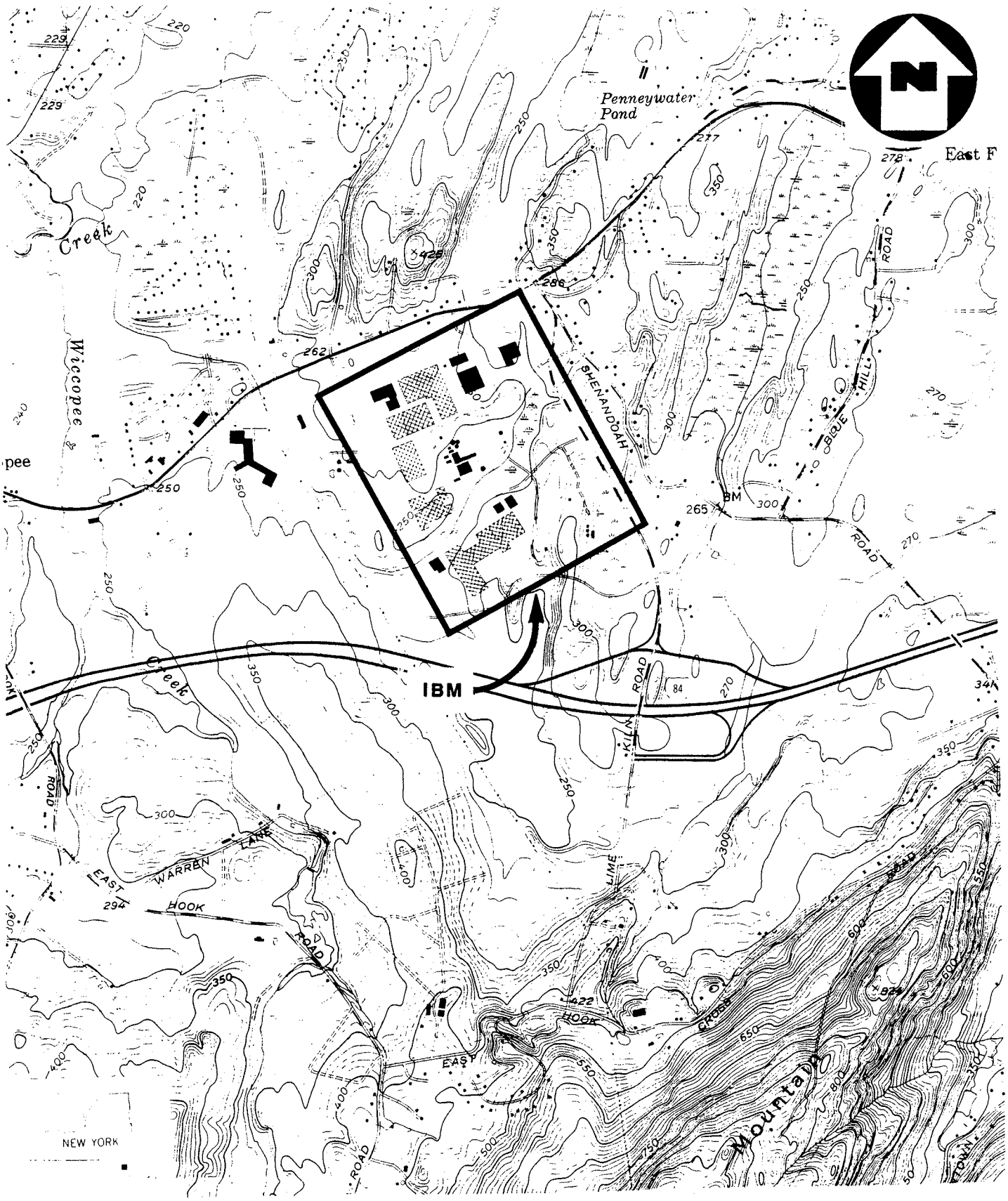
Photographs taken during the off-site reconnaissance could not be developed.

V. SOURCES OF INFORMATION (Cite specific references. e.g., state files, sample analysis, reports)

New York State Atlas of Community Water System Sources, New York State Department of Health, 1982.
RCRA Permit Quarterly Report from H.K. Fridich, IBM, to Permits Administration Branch of U.S. EPA, July 25, 1984.
RCRA Permit Quarterly Report from H. K. Fridich, IBM, to Permits Administration Branch of U.S. EPA, January 25, 1985
RCRA Compliance Inspection Report, NYSDEC, February 5, 1987
General Sciences Corporation, Graphical Exposure Modeling System (GEMS). Landover, Maryland, 1986.
U.S.G.S. Topographic Map, Hopewell Junction Quandrangle 1981.

APPENDIX A

MAPS



(QUAD) HOPEWELL JUNCTION, N.Y.

FIGURE 1

SITE LOCATION MAP

IBM, EAST FISHKILL, N.Y.

SCALE: 1"= 2000'

NUS CORPORATION

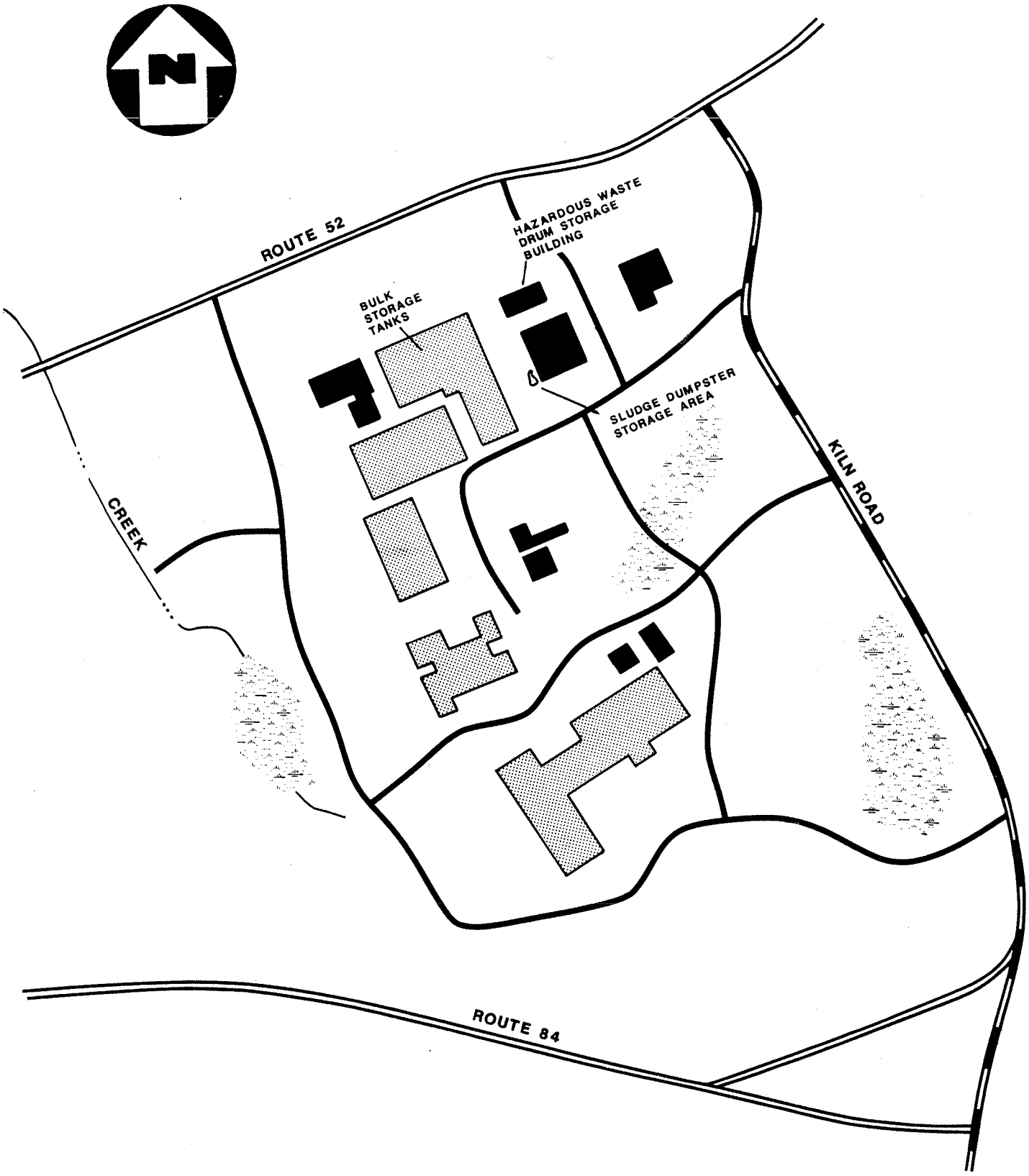


FIGURE 2

SITE MAP

IBM, EAST FISHKILL, N.Y.

(NOT TO SCALE)

NUS CORPORATION

APPENDIX B

BACKGROUND INFORMATION

HAZARDOUS WASTE DISPOSAL SITES REPORT
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Code: E
Site Code: 314001 Region: 3
Name of Site: I.B.M.
County: Dutchess Town/~~City~~ Poughkeepsie
Street Address: Behind Building #028

Status of Site Narrative:
Clean-up is in final stage, material is being excavated and transported to a secure landburial facility. The site was first covered and seeded in 1962.

Type of Site: Open Dump ☐ Landfill ☒ Structure ☐ Treatment Pond(s) ☐ Lagoon(s) ☐ Number of Ponds ____ Number of Lagoons ____

Estimated Size 1 Acres

Hazardous Wastes Disposed? Confirmed ☒ Suspected ☐

*Type and Quantity of Hazardous Wastes:

TYPE	QUANTITY (Pounds, drums, tons, gallons)
Industrial & Sanitary Sludge	26,000 cu.yds.
Cr, Cu, Ni, Fe, and others;	
drums	

*Use additional sheets if more space is needed.

Hazardous Waste Disposal Sites in NY State
Volume 1 Division of Solid Waste. NYSDEC

Name of Current Owner of Site: I.B.M.
Address of Current Owner of Site: _____

Time Period Site Was Used for Hazardous Waste Disposal:
_____, 1942 To _____, 19 51

Is site Active ☐ Inactive ☒
(Site is inactive if hazardous wastes were disposed of at this site and site was closed prior to August 25, 1979)

Types of Samples: Air ☐ Groundwater ☐ None ☐
Surface Water ☐ Soil ☒

Remedial Action: Proposed ☐ Under Design ☐
In Progress ☒ Completed ☐
Nature of Action: Removal to secure burial site

Status of Legal Action: None State ☐ Federal ☐

Permits Issued: Federal ☐ Local Government ☐ SPDES ☐
None Solid Waste ☐ Mined Land ☐ Wetlands ☐ Other ☐

Assessment of Environmental Problems:
None known, site is being excavated and material transported to a secure landbur facility. Periodic surveillance should be scheduled in order to assess the effe ness of the remedial action.

Assessment of Health Problems:

None known.

Persons Completing this Form:

Jack Doty
G. David Knowles
New York State Department of Environmental Conservation
Date 4/10/80

Ronald Tramontano
New York State Department of Health
Date 4/10/80

1/18/80
GDK:cl

445

RCRA GENERATOR INSPECTION FORM

COMPANY NAME: IBM E. FISHKILL

EPA I.D. NUMBER: NYD000707901

NOTE: Inspection done by Solid Waste Branch

COMPANY ADDRESS: RT 52 HOPEWELL JUNCTION NY.

COMPANY CONTACT OR OFFICIAL: ART STEWART

INSPECTOR'S NAME: GEORGE PAVLOV EPA, BRIAN MORAN EPA, RICHARD GARDINEER DEC

TITLE: MGR. ENV. ENG.

BRANCH/ORGANIZATION:

CHECK IF FACILITY IS ALSO A TSD FACILITY ☑

DATE OF INSPECTION: 5/28/81

	YES	NO	DON'T KNOW
(1) Is there reason to believe that the facility has hazardous waste on site?	✓		

a. If yes, what leads you to believe it is hazardous waste? Check appropriate box:

☑ Company admits that its waste is hazardous during the inspection.

☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

☒ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)

☒ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)

☒ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)

☐ EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)

☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

PA3
AUG 27 11 32 AM '81
ENVIRONMENTAL PROTECTION AGENCY
NEW YORK, N.Y. 10007

	YES	NO	DON'T KNOW
b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?		✓	

Please explain:

c. Identify the hazardous wastes that are on-site, and estimate approximate quantities of each.
WASTE SOLVENTS - 500 55gal. drums, 7 tanks of waste solvents: total = 178,000 gal.
HEAVY METAL SLUDGES - ~150 ft3

d. Describe the activities that result in the generation of hazardous waste.
HEAVY METAL SLUDGES - WASTE SOLVENTS FROM ELECTRICAL COMPONENT MFG.

(2) Is hazardous waste stored on site?	✓		
a. What is the longest period that it has been accumulated?			✓
b. Is the date when drums were placed in storage marked on each drum? NOT NECESSARY SINCE THEY FILED AS A TSDF		✓	
(3) Has hazardous waste been shipped from this facility since November 19, 1980?	✓		
a. If "yes," approximately how many shipments were made? ~ 150			
(4) Approximately how many hazardous waste shipments off site have been made since November 19, 1980? ~150			
a. Does it appear from the available information that there is a manifest copy available for each hazardous waste shipment that has been made?	✓		

b. If "no" or "don't know," please elaborate.

	YES	NO	DON'T KNOW
c. Does each manifest (or a representative sample) have the following information?			
- a manifest document number	✓		
- the generator's name, mailing address, telephone number, and EPA identification number	✓		
- the name, and EPA identification number of each transporter	✓		
- the name, address and EPA identification number of the designated facility and an alternate facility, if any:	✓		
- a description of the wastes (DOT)	✓		
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle	✓		
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA	✓		
(5) Were there any hazardous wastes stored on site at the time of the inspection?	✓		
a. If "yes," do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure?	✓		
b. If not properly packaged or in secure tanks, please explain.			
c. Are containers clearly marked and labelled? [redacted]	✓	~~✓~~	
d. Do any containers appear to be leaking?	✓		
e. If "yes," approximately how many?			

TWO, Drums [redacted] (55gal) [redacted] 1. GLYCOL ETHERS, ALCOHOLS
2. COULD NOT [redacted] DISCERN CONTENTS (INACCESSIBLE)

(1) One Drum has a liquid drip pan under it so that leak was contained
(2) Leak from second drum was small. All drums are stored in a concrete based warehouse. No environmental harm.

*(6) Has the generator submitted an annual report to EPA covering the previous calendar year? — — ✓

a. How do you know?

(7) Has the generator received signed copies (from the TSD facility) of all manifests for wastes shipped off site more than 35 days ago? ✓ ✓ —

a. If "no," have Exception Reports been submitted to EPA covering these shipments? — ✓ —

a copy recieved from TSD in less than 45 days.

(8) General comments.

DEC has a compliance order on this site relating to an existing groundwater problem. (Contact - RICHARD GARDINER P.E., WHITE PLAINS FIELD OFFICE)

* The effective date for this requirement is March 1, 1982.

International Business Machines Corporation

East Fishkill Facility, Route 52
Hopewell Junction, New York 12533
914/897-2121

June 2, 1981

R. A. Gardineer, P.E.
Senior Sanitary Engineer
Region 3 Office
New York State Department
of Environmental Conservation
202 Mamaroneck Avenue
White Plains, New York 10601

SUBJECT: RCRA Audit, May 28, 1981, of
the IBM East Fishkill site

Dear Mr. Gardineer,

At the subject RCRA audit, two apparent violations were listed by yourself and Mr. Moran and Mr. Pavlov of the US EPA. The first was the appearance of two leaking waste drums in the drum storage containment area. Immediately following the audit, we investigated these drums. The one drum in the plastic container was not leaking although there was moisture in the container which most likely developed during the drum filling process. The other drum was found to have a small leak and was immediately re-packed. It should also be noted that this storage area is properly physically contained to insure that any leaks from drums do not escape from the contained area.

The second apparent violation was inadequate aisle space in the waste drum storage area. As you know, our major disposal vendor has not been able to accept our waste drums and we have had difficulty in finding substitute qualified disposal vendors. As a result, we have experienced an abnormal increase in our inventory of waste drums. We are currently rectifying this problem. On your next visit to conduct the RCRA audit at our satellite facilities, it is requested that you re-visit this area again, at which time you will be able to verify that the corrections have been made.

Please contact me if there are further questions on this matter.

A. D. Stewart
/cdp
cc: R. G. Estabrooke
B. Moran EPA
P. Palmieri
G. Pavlov EPA
A. R. Wolfert

IBM

International Business Machines Corporation

East Fishkill Facility, Route 52
Hopewell Junction, New York 12533
914/897-2121

June 2, 1981

R. A. Gardineer, P.E.
Senior Sanitary Engineer
Region 3 Office
New York State Department
of Environmental Conservation
202 Mamaroneck Avenue
White Plains, New York 10601

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A. D. Stewart

A. D. Stewart
/cdp
cc: R. G. Estabrooke
B. Moran EPA
P. Palmieri
G. Pavlov EPA
A. R. Wolfert

RCRA INSPECTION REVIEW SHEET

516

Name of Facility - IBM
RCRA ID# - NYD 000707901
Date of Inspection - 5/28/81
Type of Inspection: Generator Transporter ✓TSD
Name of EPA/State Inspector -

R. GARDINEER, GEORGE PAVLOV, BRIAN MORAN

Findings of Inspection:

VIOLATIONS - 265.35 (AISLE SPACE)
GROUNDWATER MONITORING HAS REVEALED CONTAMINATION
265.170 (VISIBLE LEAKY DRUMS)

Action(s) Taken:

Action(s) Recommended:

ADEQUATE AISLE SPACE AND THE LEAKY DRUMS CONDITION HAS BEEN RECTIFIED. PLANT MEETS ALL REQUIREMENTS.

COMMENTS:

THE FACT THAT GROUNDWATER MONITORING HAS REVEALED CONTAMINATION MAY INDICATE PROBLEMS WITH THE UNDERGROUND TANKS. THIS SITUATION SHOLD BE CHECKED OUT AND THE SOURCE OF THE CONTAMINATION FOUND.

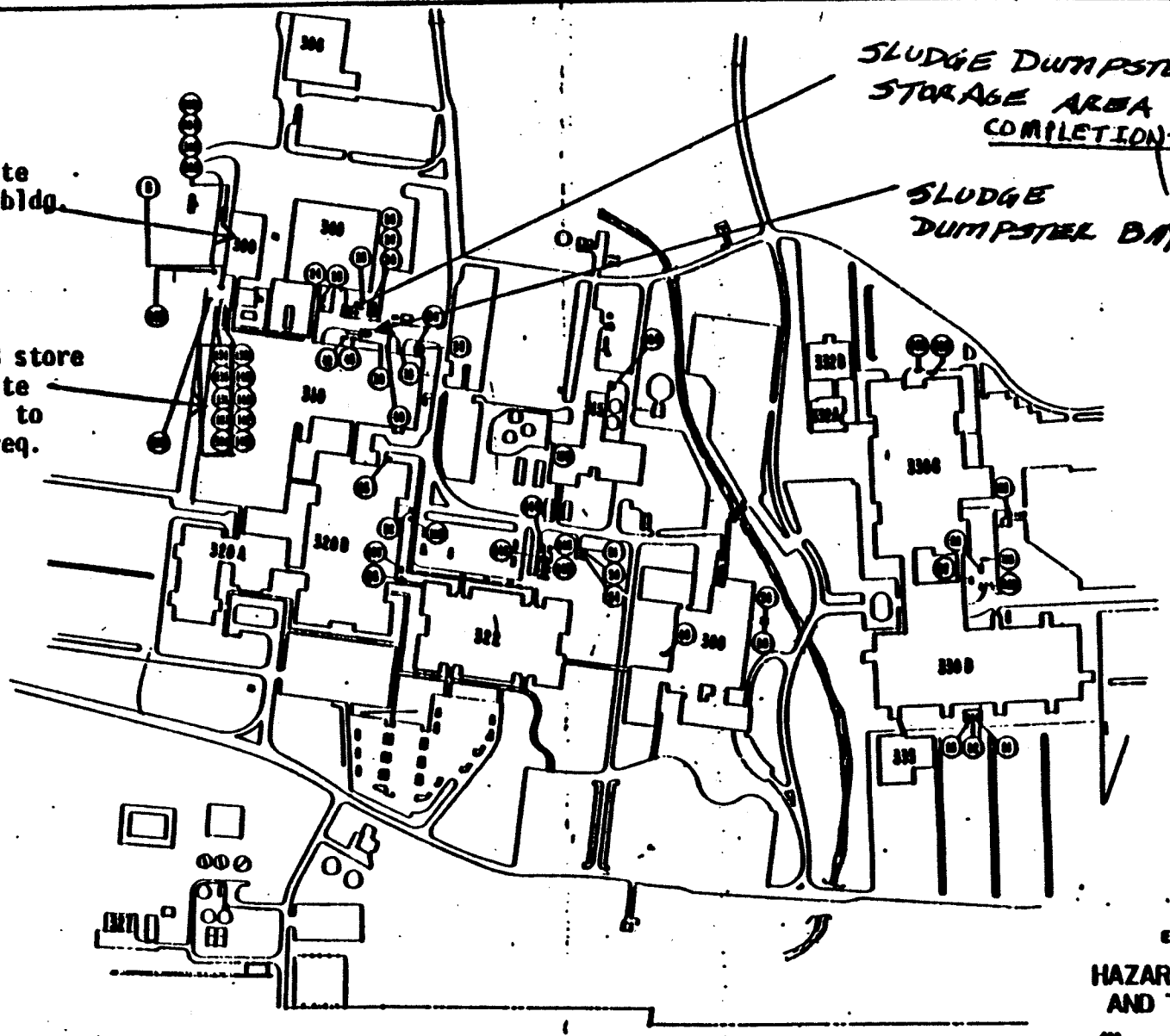


FIGURE 1

IBM CORPORATION
EAST FISHKILL, NEW YORK

HAZARDOUS WASTE STORAGE AND TREATMENT SYSTEMS

SCALE IN FEET

IBM-EF- 60

RCRA TREATMENT, STORAGE AND DISPOSAL FACILITY INSPECTION FORM
FOR TSD FACILITIES ONLY

COMPANY NAME: IBM
COMPANY ADDRESS: Route 52 East Fishkill, N.Y.
EPA I.D. Number: NYD000707901

COMPANY CONTACT OR OFFICIAL: Art Stewart
TITLE: Manager, Chem/Env Eng.

OTHER ENVIRONMENTAL PERMITS HELD BY FACILITY: ☒ NPDES ☐ AIR ☐ OTHER

INSPECTOR'S NAME: R. Gardinier (EPA G. Paulou, B. Moran)
BRANCH/ORGANIZATION: NYSDEC-Reg 3-W. Plains

DATE OF INSPECTION: May 28, 1981
TIME OF DAY INSPECTION TOOK PLACE: 11:00AM - 3:00PM

PERMITS ADMIN. BRANCH REGION II
OCT 16 11 55 AM '81
ENVIRONMENTAL PROTECTION AGENCY NEW YORK, N.Y. 10007

(1) Is there reason to believe that the facility has hazardous waste on site?

a. If yes, what leads you to believe it is hazardous waste? Check appropriate box:

☒ Company admits that its waste is hazardous during the inspection.

☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

☒ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)

☒ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)

☒ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)

☐ EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)

☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

	YES	NO	DON'T KNOW
b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?	___	X	___

Please explain:

c. Identify the hazardous wastes that are on-site, and estimate approximate quantities of each.
1.) Waste Solvents 500 - 55 gal. drums & 7 Underground tanks - 178,000 gallons
2.) Heavy Metal Sludges

(2) Does the facility generate hazardous waste?	X	___	___
(3) Does the facility transport hazardous waste?	___	X	___
(4) Does the facility treat, store or dispose of hazardous waste?	X	___	___

Storage - solvents
Treat. - Heavy metal sludges

47-15-12(5/81)

VISUAL OBSERVATIONS

	YES	NO	DON'T KNOW
(5) SITE SECURITY (§265.14)			
a. Is there a 24-hour surveillance system?	—	X	—
b. Is there a suitable barrier which completely surrounds the active portion of the facility? Yes - Fencing			
c. Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?	X	—	—
(6) Are there ignitable (Solvents), reactive (flourides) or incompatible wastes on site? (§265.27)	X	—	—
a. If "YES", what are the approximate quantities? See item 1C			
b. If "YES", have precautions been taken to prevent accidential ignition or reaction of ignitable or reactive waste?	X	—	—
c. If "YES", explain- They are stored in separate tanks and have separate piping systems. Also a concrete wall separates cyanides from oxidizers.			
d. In your opinion, are proper precautions taken so that these wastes do not:			
- generate extreme heat or pressure, fire or explosion, or violent reaction?	X	—	—
- produce uncontrolled toxic mists, fumes, dusts, or gases in sufficent quantities to threaten human health?	X	—	—
- produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions?	X	—	—
- damage the structural integrity of the device or facility containing the waste? Pipe testing program	X	—	—
- threaten human health or the environment?	—	—	X

Please explain your answers, and comment if necessary.

e. Are there any additional precautions which you would recommend to improve hazardous waste handling procedures at the facility?

(7) Does the facility comply with preparedness and prevention requirements including maintaining: (§265.32)

Yes

	YES	NO	DON'T KNOW
- an internal communications or alarm system? High Level Alarm	X	—	—
- a telephone or other device to summon emergency assistance from local authorities?	X	—	—
- portable fire equipment? Our own Fire Department	X	—	—
- adequate aisle space? — Drum storage Area	—	X	—
- in your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.	—	—	X

In your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.

9) Have you inspected to verify that the groundwater monitoring wells (if any) mentioned in the facility's groundwater monitoring plan (see no. 19 below) are properly installed?	NA	—	—

If you have, please comment, as appropriate.
except - storage facility

11) a. Is there any reason to believe that groundwater contamination already exists from this facility? If "YES", explain.	X	—	—
b. Do you believe that operation of this facility may affect groundwater quality?	X	—	—

c. If "YES", explain. Groundwater monitoring has revealed contamination Previous operations may have had leaks in the piping. Occassional spills have also occurred. N.Y.S. In-Place Toxic Site No. 344054

RECORDS INSPECTION

20) Has the facility received hazardous waste from an off-site source since Nov. 19, 1980 (effective of the regulations)?	X	—	—
a. If "YES", does it appear that the facility has a copy of a manifest for each hazardous waste load received?	X	—	—
b. How many post-November 19 manifests does it have? (If the number is large, you may estimate) approx. 150			
c. Does each manifest (or a representative sample) have the following information?			
document number	X	—	—

This requirement applies only after November 19, 1981.

	YES	NO	DON'T KNOW
- the generator's name, mailing address, telephone number, and EPA identification number	X		
- the name, and EPA identification number of each transporter	X		
- the name, address and EPA identification number of the designated facility and an alternate facility, if any;	X		
- a DOT description of the wastes	X		
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle	X		
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA.	X		
d. Are there any indications that unmanifested hazardous wastes have been received since November 19, 1980? If YES, explain.		X	
(11) Does the facility have a written waste analysis plan specifying test methods, sampling methods and sampling frequency? (§265.13)	X		
a. Does the character of wastes handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? (You may check more than one) Waste characteristics vary ____ All wastes are basically the same X Company treats all waste as hazardous ____ Don't Know ____			
b. Does hazardous waste come to this facility from off-site sources?	X		
c. If waste comes from an off-site source, are there procedures in the plan to insure that wastes received conform to the accompanying manifest?	X		
(12) INSPECTIONS (§265.15)			
a. Does the facility have a written inspection schedule?	X		
b. Does the schedule identify the types of problems to be looked for and the frequency for inspections?	X		
c. Does the owner/operator record inspections in a log?	X		
d. Is there evidence that problems reported in the inspection log have not been remedied? If "YES," please explain.		X	

	YES	NO	DON'T KNOW

(13) PERSONNEL TRAINING (§265.16)

a. Is there written documentation of the following:

- job title for each position at the facility related to hazardous waste management and the name of the employee filling each job? X
- type and amount of training to be given to personnel in jobs related to hazardous waste management? X
- actual training or experience received by personnel? X

Kept in individual's training file

(14) Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosion or any unplanned release of hazardous waste? (§265.51) X

a. Does the plan describe arrangements made with local authorities? X

b. Has the contingency plan been submitted to local authorities? X

How do you know?
Verbally communicated by Mr. Stewart during inspection.

c. Does the plan list names, addresses, and phone numbers of Emergency Coordinators? X

d. Does the plan have a list of what emergency equipment is available? X

e. Is there a provision for evacuating facility personnel? X

f. Was an Emergency Coordinator present or on call at the time of the inspection? X

(15) Does the owner/operator keep a written operating record with: (§265.73)

- a description of wastes received with methods and dates of treatment, storage or disposal? X
- location and quantity of each waste? X
- detailed records and results of waste analysis and treatability tests performed on wastes coming into the facility? X
- detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan? X

*(16) Does the facility have written closure and post-closure plans? (§265.110) X

a. Does the written closure plan include:

- a description of how and when the facility [illegible] (if applicable) and ultimately closed? X

* Effective date for this requirement is May 19, 1981.

	YES	NO	DON'T KNOW
- an estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility?	X		
- a description of the steps necessary to decontaminate facility equipment during closure?	X		
- a schedule for final closure including the anticipated date when wastes will no longer be received and when final closure will be completed?		X	
b. What is the anticipated date for final closure? Not anticipated			X
†c. Does the owner/operator have a written post-closure plan identifying the activities which will be carried on after closure and the frequency of these activities?		X	
d. Does the written post-closure plan include:			
- a description of planned groundwater monitoring activities and their frequencies during post-closure?			NA
- a description of planned maintenance activities and frequencies to ensure integrity of final cover during post-closure?			
- the name, address and phone number of a person or office to contact during post-closure?			
*(17) Does the owner/operator have a written estimate of the cost of closing the facility? (§265.142) What is it? $650,000.	X		
*(18) Does the owner/operator have a written estimate of the cost for post-closure monitoring and maintenance? What is it? (§265.144)			NA
*(19) Has a groundwater monitoring plan been submitted to the Regional Administrator for facilities containing a surface impoundment, landfill or land treatment process? (This requirement does not apply to recycling facilities.) (§265.90)			NA
a. Does the plan indicate that at least one monitoring well has been installed hydraulically upgradient from the limit of the waste mangement area?			
b. Does the plan indicate that there are at least three monitoring wells installed hydraulically downgradient at the limit of the waste management area?			

† This section applies only to disposal facilities.

* Effective date for this requirement is May 19, 1981.

SITE-SPECIFIC

Please circle all appropriate activities and answer questions on indicated pages for all activities circled. When you submit your report, include only those site-specific pages that you have used.

STORAGE	TREATMENT	DISPOSAL
Waste Pile p. 9	Tank p. 8	Landfill pp. 10-11
Surface Impoundment p. 8	Surface Impoundment pp. 8-9	Land Treatment pp. 9, 10
Container p. 7	Incineration pp. 12-13	Surface Impoundment p. 8
Tank, above ground p. 8	Thermal Treatment pp. 12-13	Other _____
Tank, below ground p. 8	Land Treatment pp. 9-10	
Other _____	Chemical, Physical and Biological Treatment (other than in tanks, surface impoundment or land treatment facilities) p. 13	
	Other _____	

CONTAINERS (§265.170)

	YES	NO	DON'T KNOW
1. Are there any leaking containers? If "YES", explain. 1.) There appears to be a leak in one or more drums in the Solvent storage area (fluid on concrete floor). No Aisle space. 2) Leakage (fluid) in bottom of berm collection of ~~drum~~ drum.	[redacted]	—	X See Remarks below
2. Are there any containers which appear in danger of leaking? If "YES", explain.	—	X	—
3. Do wastes appear compatible with container materials?	—	—	X
4. Are all containers closed except those in use?	X	—	—
5. Do containers appear to be opened, handled or stored in a manner which may rupture the containers or cause them to leak?	—	X	—

6. How often does the plant manager claim to inspect container storage areas? Once a day.

7. Does it appear that incompatible wastes are being stored in close proximity to one another? If "YES", explain. Oxidizers and cyanides Separated by a Concrete wall	—	X	—
8. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?	X	—	—

9. What is the approximate number and size of containers with hazardous wastes? 500 - 55 gal. drums.

TANKS (§265.190)

	YES	NO	DON'T KNOW
1. Are there any leaking tanks? If "YES", explain. Underground solvent tanks	—	—	X
2. Are there any tanks which appear in danger of leaking. If "YES", explain.	—	—	X
3. Are wastes or treatment reagents being placed in tanks which could cause them to rupture, leak, corrode or otherwise fail? If "YES", explain.	—	—	X
4. Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?	—	N/A	
5. Where hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow?	X	—	—
6. Does it appear that incompatible wastes are being stored in close proximity to one another, or in the same tank? If "YES", explain.	—	X	—
7. How often does the plant manager claim to inspect container storage areas? Daily			
8. Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction? If "YES", explain. Below ground. Unloading area drains (by pipe) to tank.	X	—	—

9. What is the approximate number and size of tanks containing hazardous wastes? 2 solvent tanks - 3 000 gal.
1 solvent tank - 5 000 "
1 solvent tank - 10,000 "

SURFACE IMPOUNDMENTS (§265.220)

1. Is there at least 2 feet of freeboard in the impoundment?	—	—	—
2. Do all earthen dikes have a protective cover to preserve their structural integrity? If "YES", specify type of covering.	—	—	—
3. Is there reason to believe that incompatible wastes are being placed in the same surface impoundment? If "YES", explain.	—	—	—

a. If "YES", what is being burned? (only burning or detonation of explosives is permitted)

b. If open burning or detonation of explosives is taking place, approximately what is the distance from the open burning or detonation to the property of others?

	YES	NO	DON'T KNOW
6. Does the incinerator appear to be operating properly? (Do emergency shutdown controls and system alarms seem to be in good working order?) Please explain.	—	—	—
a. Is there any evidence of fugitive emissions?	—	—	—
7. Is the residue from the incinerator treated by the owner as a hazardous waste? Please explain.	—	—	—

8. What types of air pollution control devices (if any) are installed on the incinerator?

CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (§265.400)

1. Does the treatment process system show any signs of ruptures, leaks, or corrosion? Please explain. Flouride Underground Pipes	—	—	X
2. Is there a means to stop the inflow of continuously-fed hazardous wastes?	X	—	—
3. Is there ignitable or reactive waste fed into the treatment system?	X	—	—
If "YES", has it been treated or protected from any material or conditions which may cause it to ignite or react? If so, explain how. Acid Flouride Waste	—	—	X
Are the incompatible wastes placed in the same treatment process? If "YES", explain.	—	—	X

5. Describe the treatment system at this facility.

Heavy Metal + Flouride treatment Chigh limed
Filter Press to dewater sludge.
900 gal/1 load → Prodoction 1x10⁶ Tons/yr
sludge per month

(Pages 9-12 Removed
No Information required)

EPA Notification of Hazardous Waste Site

United States Environmental Protection Agency Washington DC 20460

This initial notification information is required by Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 and must be mailed by June 9, 1981.

Please type or print in ink. If you need additional space, use separate sheets of paper. Indicate the letter of the item which applies. 8/0609

NYS 000 01 294

A Person Required to Notify:

Enter the name and address of the person or organization required to notify.

Name: International Business Machines Corporation

Street: East Fishkill Facility, Route 52

City: Hopewell Junction State: NY Zip Code: 12533

B Site Location:

Enter the common name (if known) and actual location of the site.

NYD000707901

Name of Site: IBM East Fishkill Facility

Street: Route 52

City: East Fishkill County: Dutchess State: NY Zip Code: 12533

C Person to Contact:

Enter the name, title (if applicable), and business telephone number of the person to contact regarding information submitted on this form.

Name (Last, First and Title): Stewart, Arthur D., Manager, Dept. 77D

Phone: (914) 897-7100

D Dates of Waste Handling:

Enter the years that you estimate waste treatment, storage, or disposal began and ended at the site.

From (Year): 1963 To (Year): ~~To Date~~ 1981

E Waste Type: Choose the option you prefer to complete

Option 1: Select general waste types and source categories. If you do not know the general waste types or sources, you are encouraged to describe the site in Item I—Description of Site.

General Type of Waste:
Place an X in the appropriate boxes. The categories listed overlap. Check each applicable category.

1. ☒ Organics
2. ☒ Inorganics
3. ☒ Solvents
4. ☐ Pesticides
5. ☒ Heavy metals
6. ☒ Acids
7. ☒ Bases
8. ☐ PCBs
9. ☐ Mixed Municipal Waste
10. ☐ Unknown
11. ☐ Other (Specify)

_____

_____

_____

Source of Waste:
Place an X in the appropriate boxes.

1. ☐ Mining
2. ☐ Construction
3. ☐ Textiles
4. ☐ Fertilizer
5. ☐ Paper/Printing
6. ☐ Leather Tanning
7. ☐ Iron/Steel Foundry
8. ☐ Chemical, General
9. ☒ Plating/Polishing
10. ☐ Military/Ammunition
11. ☐ Electrical Conductors
12. ☐ Transformers
13. ☐ Utility Companies
14. ☒ Sanitary/Refuse
15. ☐ Photofinish
16. ☐ Lab/Hospital
17. ☐ Unknown
18. ☒ Other (Specify)

(Semi-Conductor Manufacturing)

400

Option 2: This option is available to persons familiar with the Resource Conservation and Recovery Act (RCRA) Section 3001 regulations (40 CFR Part 261).

Specific Type of Waste:
EPA has assigned a four-digit number to each hazardous waste listed in the regulations under Section 3001 of RCRA. Enter the appropriate four-digit number in the boxes provided. A copy of the list of hazardous wastes and codes can be obtained by contacting the EPA Region serving the State in which the site is located.

Form Approved
OMB No. 2000-0138

EPA Form 8900-1

Waste Quantity:

Place an X in the appropriate boxes to indicate the facility types found at the site.

In the "total facility waste amount" space give the estimated combined quantity (volume) of hazardous wastes at the site using cubic feet or gallons.

In the "total facility area" space, give the estimated area size which the facilities occupy using square feet or acres.

Facility Type

1. ☐ Piles
2. ☐ Land Treatment
3. ☐ Landfill
4. ☐ Tanks
5. ☐ Impoundment
6. ☐ Underground Injection
7. ☐ Drums, Above Ground
8. ☐ Drums, Below Ground
9. ☒ Other (Specify) ~~(See Attachment #2)~~ 600 ~~LEAKAGE OR SPILLAGE~~

Total Facility Waste Amount

cubic feet See Attachment #2

gallons

Total Facility Area

square feet

acres 45 ~~Aestimated~~)

Known, Suspected or Likely Releases to the Environment:

Place an X in the appropriate boxes to indicate any known, suspected, or likely releases of wastes to the environment.

☐ Known ☒ Suspected ☒ Likely ☐ None

Note: Items H and I are optional. Completing these items will assist EPA and State and local governments in locating and assessing hazardous waste sites. Although completing the items is not required, you are encouraged to do so.

I Sketch Map of Site Location: (Optional)

Sketch a map showing streets, highways, routes or other prominent landmarks near the site. Place an X on the map to indicate the site location. Draw an arrow showing the direction north. You may substitute a publishing map showing the site location.

SEE ATTACHMENT #1

Description of Site: (Optional)

Describe the history and present conditions of the site. Give directions to the site and describe any nearby wells, springs, lakes, or housing. Include such information as how waste was disposed and where the waste came from. Provide any other information or comments which may help describe the site conditions.

(SEE ATTACHMENT #2)

J Signature and Title:

The person or authorized representative (such as plant managers, superintendents, trustees or attorneys) of persons required to notify must sign the form and provide a mailing address (if different than address in item A). For other persons providing notification, the signature is optional. Check the boxes which best describe the relationship to the site of the person required to notify. If you are not required to notify check "Other".

Name R. V. McFadden, Mgr. Plans & Site Support

Street East Fishkill Facility, Route 52

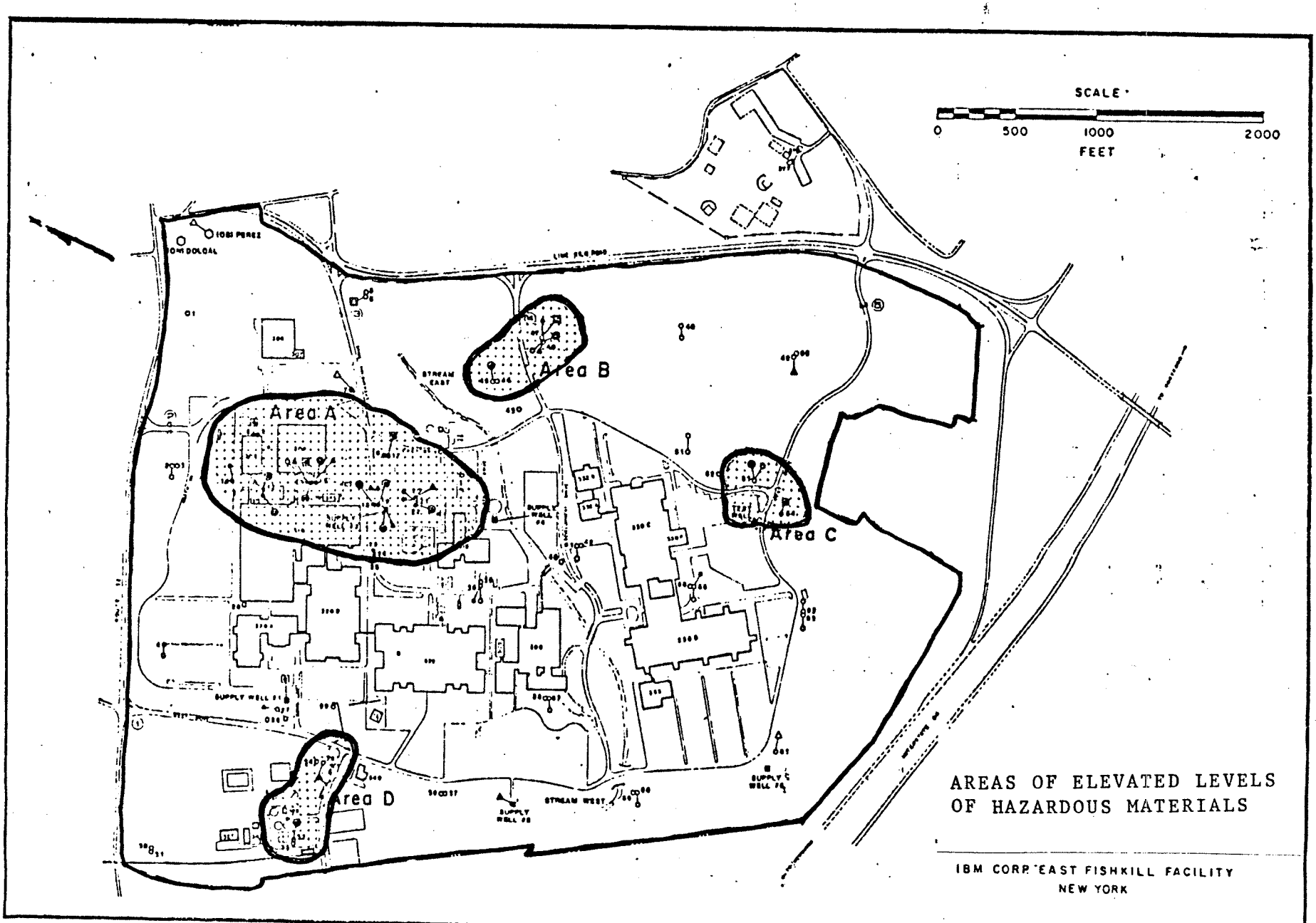
City Hopewell Junction State NY Zip Code 12533

Signature RVMcFadden Date 6/9/81

AFW

☒ Owner, Present
☐ Owner, Past
☐ Transporter
☒ Operator, Present
☐ Operator, Past
☐ Other

ATTACHMENT 1



ATTACHMENT 2

IBM has listed below the four areas that show elevated levels of hazardous materials in the groundwater monitoring wells on IBM East Fishkill Site. The data that we have accumulated to date indicates that these hazardous materials have not migrated off-site. The New York State Department of Environmental Conservation has formally approved IBM's remedial plan, previously implemented by IBM, providing for containment of the hazardous materials on site and investigation as to the best method for extraction and treatment of the groundwater in all four areas. Please refer to Attachment 1 for identity of these areas.

I. Area A - Though we have no definitive evidence, we suspect that the chemicals found in the groundwater may have come from small accidental spills from transfer operations as well as undetected leaks from underground pipes over a long period of time prior to 1978. We have found no evidence that the area was used by IBM or any prior owner as a dump site.

II. We believe that hazardous materials found in Areas B, C and D resulted from minor leakage or spillage, within normal operations, and pose no significant risk to human health or the environment. Because our investigations of these areas are continuing, we have elected to report them to you.

Area B - This area was used by IBM's firefighting personnel and small amounts of solvents were used during periodic training sessions. This activity is no longer allowed on the East Fishkill Site.

Area C - We have not been able to identify the origin of the hazardous materials discovered in this area. Investigations are continuing.

Area D - We believe that this area was used for firefighting training until moved to Area B. Investigations are continuing.

New York State Department of Environmental Conservation
Division of Solid and Hazardous Waste
50 Wolf Road, Albany, New York 12233

PART I

General Information and Classification of Facility

1. Identification of Hazardous Waste - 366 — Yes: X — No: ___

A. Is there reason to believe the facility has hazardous waste on-site? If yes, what leads you to believe it is hazardous waste? Check appropriate box/boxes and attach any applicable correspondence with DEC or EPA:

(1) X Company recognizes that its waste is hazardous during the inspection.

(2) Y Company admitted the waste is hazardous in its RCRA notification and/or Part A permit application.

(3) X EPA testing (SWA-46) has shown characteristics of:
( ) ignitability - 366.3(b);
(✓) corrosivity - 366.3(c);
(✓) reactivity - 366.3(d);
( ) EP toxicity - 366.3(e)

___ Has revealed hazardous constituents (please attach analysis report) 366.4(a)2 (261 Appendix VIII)

(4) X The material is listed in the regulations as a hazardous waste from non-specific sources 366.4b.

(5) X The waste material is listed in the regulations as a hazardous waste from specific sources. 366.4c.

(6) ___ The material or product is listed in the regulations as discarded commercial chemical products, off-specification species, containers residues and spill residues thereof. 366.4d.

(7) ___ Company is unsure, but they have reason to believe that waste materials are hazardous. (Explain) _____

_____.

(8) ___ If don't know, please explain: _____

_____

_____

_____

B. Is there reason, other than those above, for you to believe that there are hazardous waste on site? (Explain) _____

_____

_____

C. What other environmental permits are held by the company, relative to hazardous waste management?

X SPDES Permit Number X Air Permit Number

____ Part 364 Industrial Waste Transporter Permit (indicate this company's permit number if any)

Please describe other relavent (if any) permits and give the name, address, Part 364 Permit Number and EPA I.D. Number of transporter(s) used by company.

Ceres International - NYD080 336 241
Rollins Environmental - NJD053288239
SCA Chemical Serv. - NJD089216790

D. If the facility is a treatment, storage or disposal facility, have they:

X Submitted a Part A application. ____ Have changes been made that are not reflected in the Part A application? Should the Part A be modified by the Company? ____ If so, explain.

_____

_____

_____

_____

_____

X Submitted a Part B application.

____ Been granted a Part 360 permit.

If so, when does it expire: _____
Please attach or explain any special conditions or variances - 360.1(g) _____

_____

_____

_____

X Been granted a hazardous waste Part B permit.

If so, also complete the facility Part B (Part 360) permitted inspection report - Appendix K.

E. Describe the activities that result in the generation of hazardous waste. Include the company's manufacturing processes.

Manufacturing of electronic computer components.

F. Identify the hazardous wastes that are on-site and the quantity of each (use the identification numbers referred to in Part 366).

74 drums (55 gallons) Agonic
125 drums of waste solvents

G. The handler notified EPA as a:

Generator and TSD.

Has EPA or DEC officially modified the handlers status? If so, attach correspondence. _____

_____

2. Status Identification:

This handler should be inspected as a (check each appropriate category after considering exemptions)

A. ____ Transporter - complete Appendix B

B. Generator Status Identification 365.1

1. ____ Category 1 generator - small quantity generator - generates than 100 kg/mo and stores less than 100 kg. - 365.1(e)(1)i - Complete Part II, 1B.

2. ____ Category 2 generator - small quantity generator - generates less than 100 kg/mo and stores more than 100 kg but less than 1,000 kg. - 365.1(e)(1)ii - Complete Part II, 1C.

3. ____ Category 3 generator - small quantity generator - generates more than 100 kg/mo but less than 1,000 kg/mo and stores less than 1,000 kg. - 365.1(e)(1)iii - Complete Part II, 1C and 1D.

4. ____ Category 4 generator - small quantity generator as set forth in 365.1(e)(1)iv Below - Complete Part II, 1B.

(a) ____ A total of one kilogram of all commercial product or manufacturing chemical intermediate having the generic name listed in paragraph 366.4(d)5.

(b) ____ A total of one kilogram of any off-specification commercial chemical product or manufacturing chemical intermediate which, if it met specifications, would have the generic name listed in paragraph 366.4(d)5.

(c) ____ Any containers identified in paragraph 366.4 (d)(3) of this title that are larger than 20 liters in capacity.

(d) ____ A total of 10 kilograms of inner liner from containers identified in paragraph 366.4 (d)(3) of this title.

(e) ____ One hundred (100) kilograms of any residue or contaminated soil, water or other debris resulting from the cleanup of a spill, into or on any land or water, of any commercial chemical product or manufacturing chemical intermediate having the generic name listed in paragraph 366.4 (d) 5 of this title.

5. ____ Category 5 generator - generated 1,000 kilograms or more per month - Complete Part II.

6. ____ Category 6 generator - stores 1,000 kilograms or more - Complete Part II.

C. Treatment, Storage or Disposal Facility Status

On-site accumulation of hazardous waste prior to shipment - 365.2 (a)7

1. Is hazardous waste generated and stored on-site? If so:

   (a) ___X___ Has hazardous waste been stored on-site longer than 90 days? 365.2 (a)(7)(i) - If yes, complete Appendix A.

   (b) ____ Has more than 8,800 gallons of hazardous waste been stored in containers? 365.2 (a)(7)(i) - If yes, complete Appendix A.

   (c) ____ Has more than 20,000 gallons of hazardous waste been stored in tanks? 365.3 (a)(7)(i) - If yes, complete Appendix A.

2. ____ Hazardous waste received from off-site and not beneficially used, reused or legitimately recycled or stored. If yes, complete Appendix A.

3. ____ Hazardous waste is treated on-site. 360.1(b)

4. ____ Hazardous waste is disposed of on-site. 360.1(b) NP

3. Exemptions

If the handler is inspected other than as they notified (e.g., notified as generator/TSD - inspected as exempt generator) a full explaination should be included in Part III.

A. Generator Exemptions

(1) ____ Not a regulated handler (be sure to indicate why in Part I 1F and 1G and/or in appropriate exemption below - for example the company notified for precautionary reasons or the waste generated is not hazardous as specified in 366.1(g)(2).

(2) ____ Delisted hazardous waste 366.4-366.6 IDENTIFY the waste that was delisted: (If the company is in the delisting process they are still regulated until their delisting petition is favorably approved) Complete appropriate parts depending on company status.

_____

_____

_____

(3) ____ Exemption for used engine lubricating oil. 365.1(e)2 - Complete Part II, 1B.

(4) ____ Exemption for farmers. 365.1(e)(3). Only if he triple rinses each emptied pesticide container in accordance with paragraph 365.1(e)(3)i or 365.1(e)(3)ii, and disposes of the pesticide residues on his own farm in a manner consistent with Section 325.4(d) of this title or in a manner consistent with the disposal instructions on the pesticide label, whichever is more restrictive.

(5) ____ Exemption for publicly owned treatment works 365.1(e)4.

(6) ____ Samples shipped to laboratories solely for analysis. 365.1(e)5.

(7) ____ Residues of hazardous waste in empty containers. 365.1(e)6.

(8) ____ A hazardous waste which is generated in a product or raw material storage tank, a product or raw material transport vehicle or vessel, a product or raw material pipeline, or in a manufacturing process unit or an associated non-waste treatment manufacturing unit is not subject to regulation until it exits the unit in which it was generated, unless the unit is a surface impoundment, or unless the hazardous waste remains in the unit more than 90 days after the unit ceases to be operated for manufacturing, or for storage or transportation of product or raw materials. 365.1(e)7.

(9) ____ Mixed with non-hazardous waste is exempt only if unregulated quantity is mixed and the resulting mixutre does not fairl a characteristic test - 365.1(e)(v).

B. TSD Exemptions

1. TSD exemptions - 360.1 (f) 2 (for facilities and operations that manage hazardous waste other than waste oil)

(a) ____ The disposal of waste pesticides on a farm by the farmer who generated them if the container or inner liner has been triple rinsed or the inner liner has been removed and the disposal method is proper - 360.1 (f)(2)(i); 365.1 (e)(3).

(b) ____ Storage of characteristic hazardous waste prior to its beneficial use or reuse or legitimate recycling or reclamation - if the hazardous waste is not a sludge, the facility processes a valid EPA identification number, and such storage occurs off-site of the waste's generation. 360.1 (f)(2)(iv) - If yes, complete Part II, 2, 3C, 3D.

(c) ____ Beneficial use or reuse or legitmate recycling or reclamation of hazardous waste provided that if such management occurs off-site of the waste's generation, the management is of

neither listed hazardous waste nor sludge, the facility processes a valid EPA identification number, and if the facility recovers energy from the waste, complies with Part 201 (air permit).

(d) ____ The treatment of hazardous waste prior to its beneficial use or reuse or legitimate recycling or reclamation if the treatment is of neither listed hazardous waste nor sludge and the facility possesses a valid EPA identification number. 360.1 (f)(2)(vi).

2. TSD exemptions - 360.1 (f)(3) (for facilities and operations that manage waste oils)

(a) ____ Storage or treatment of waste oil generated on-site prior to its beneficial use or resue or legitimate recycling or reclamation if the waste oil is not a listed hazardous waste, and the waste oil is not a hazardous sludge. 360.1 (f)(3)(iii). (Check for prevention of spills and discharges to storm and sanitary sewers.)

(b) ____ Exemptions for storage of waste oil at an energy recovery facility prior to its on-site combustion of such waste oils are not listed hazardous wastes, waste oils are not hazardous sludges, and the facility stored less than 80,000 gallons of waste oil. 360.1 (f)(3)(iv). (Check for prevention of spills and discharges to storm and sanitary sewers.)

(c) ____ Combustion units that recover energy from waste oil, other than listed hazardous waste and sludges and the related treatment on-site of such combustion units if the facility complies with their air permit and if the facility manages waste oil which is a characteristic hazardous waste generated off-site, and it possesses a valid EPA identification number. 360.1 (f)(3)(v)

3. TSD exemptions - 360.1 (f)(2) and 360.1 (f) 3 (for facilities and operations that manage hazardous waste or waste oils).

(a) ____ Storage of hazardous waste generated and stored on-site for 90 days or less and 8,800 gallons or less is stored in containers or 20,000 gallons or less is stored in tanks. The facility can not be located in a geographical area overlying a sole source aquifer. 360.1 (f)(2)(ii) - If yes, complete Part II, 2A, 3C, 3D.

(b) ____ Storage or treatment of hazardous waste on-site of generation if generated and stored less than 1,000 kilograms of hazardous waste in each calendar month and do not generate or store acute hazardous waste as described in 365.1 (e)(1)(iv). - 360.1 (f)(2)(iii).

(c) ____ Totally enclosed treatment facility for hazardous waste if totally enclosed treatment facility is directly connected to an industrial production process and the process is

constructed and operated in a manner which prevents the release of any hazardous waste or constituent thereof into the environment during treatment. 360.1 (f)(2)(viii) and 360.1 (f)(3).

(d) ____ Elementary neutralization unit or wastewater treatment unit if owned or operated by a generator and treating only waste generated on-site - 360.1 (f)(2)(viii) and 360.1 (f)(3) - if yes, complete Part II 2A, 2B, 3C and 3D.

. Environmental Facilities Corporation (EFC) Survey

The following questions are voluntary:

The Environmental Facilities Corporation (EFC) is actively involved in the ı 'ustrial materials recycling program, and these questions will assist EFC in a rying out this program. It may also be beneficial to the facility being nspected in that acceptable markets or more economical alternatives to the acility's current disposal techniques may be brought to their attention.

A. Does the company believe their hazardous waste has the potential for recovery, reclamation or exchange with other companies to minimize disposal costs? ___Yes ___No ___Don't Know

f yes:

B. Does the company wish to list their waste stream in the Northeast Industrial Waste Exchange Listings Catalog? ___Yes ___No ___Don't Know

C. Does the company want to receive additional information about the potential for waste exchange? ___Yes ___No ___Don't Know

D. Does the company wish to obtain assistance from the New York State Environmental Facilities Corporation to assess the potential for recovery, reclamation or exchange of the hazardous waste stream? ___Yes ___No ___Don't Know

The Company representative may wish to contact Mr. Pickett Simpson, a ardous Waste Program Manager, Environmental Facilities Corporation, 50 Wolf ɔ..d, Room 527, Albany, New York 12233 at (518) 457-4138.

New York State Department of Environmental Conservation
Division of Solid and Hazardous Waste
Bureau of Hazardous Waste Operations
50 Wolf Road, Albany, New York 12233

Part II

Generator Inspection Section

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

1. Requirements for Category 1-4 Generators:

Refer to questions based upon category checked in Part I.

A.___ If in Part I an exemption applies, inspection is complete if only category company is regulated under and requirements for that exemption are met. ____

B. If Category 1 and 4 generators or generators exempt for used engine lubricating oil, has met the following:

____ disposed in a solid waste facility - 365.1(e)(1)(i)(a) ____

____ made a hazardous waste determination - 365.1(e)(1)(i)(b) ____

C. If Category 2 and 3 generators has met the following:

____ made a hazardous waste determination - 365.1(e)(1)(ii)(a) ____

____ disposed of in authorized hazardous waste facility - 365.1(e)(1)(ii)(b) ____

____ submitted document justifying exemption - 365.1(e)(1)(ii)(c) ____ NA

____ used appropriate containers; properly packaged, labeled and marked during storage and shipment - 365.1(e)(1)(ii)(d) ____

____ had containers and tanks stored properly; inspected at least quarterly - 365.1(e)(1)(ii)(e) ____

____ had tanks designed, constructed and operated in accordance with regulations - 365.1(e)(1)(ii)(f) ____

____ had tanks properly sheltered and protected-365.1(e)(1)(ii)(g)____

D. If Categor, 3 generator, has:

____ annual report prepared - 365.1(e)(1)iii; and ____

____ sent to DEC - 365.2(c)2 ____

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

For Category 5 and 6 generators complete remainder of Part II.

2. Labeling & Marking

A. ____ The container is marked with the date upon which each period of accumulation begins - 365.2(a)(7)(ii)(c) NA

B. ____ The container is labeled and marked in accordance with paragraphs 365.2(a)4 and 365.2(a)5. - 365.2(a)(7)(ii)(d) X

3. On-site accumulation of hazardous waste prior to shipment - 365.2(a)7. NA
(For generators who accumulate any hazardous waste for a period of 90 days or less or store 8,800 gallons or less in containers or 20,000 gallons or less in tanks.)

A. ____ All such wastes are shipped off-site to a permitted treatment, storage or disposal (TSD) facility in 90 days or less or treated on-site of generation in 90 days or less - 365.2(a)(7)(ii)(a) NA

B. ____ The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container 365.2(a)(7)(ii)(c) NA

C. Standards for management of containers - 365.2(a)8
(This section will also be completed for TSD's as refered to from Appendix A.)

1. What type of containers are used for accumulation? Describe the size, type. (e.g., 12 fifty-five gallon drums of waste acetone).

55 gallon drums - containing waste solvents and cyanide

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

2. ____ The containers appear to be in good condition and are not in danger of leaking. (If containers are leaking, describe the type, condition and number that are leaking or corroded. Be detailed and specific)-365.2(a)(8)iii or 360.8(c)(8)(i). X

3. ____ Hazardous waste stored in containers made of compatible materials in accordance with paragraph 365.2(a)3 - 365.2(a)(8)i or 360.8(c)(8)ii (If not, please explain). X

4. ____ All containers except those in use are closed - 365.2(a)(8)ii or 360.8(c)(8)(iii)(a) X

5. ____ Containers holding hazardous waste do not appear to be opened, handled or stored in a manner which may rupture the container or cause it to leak - 365.2(a)(8)iii or 360.8(c)(8)(iii)(b) X

6. ____ The storage area is inspected at least weekly - 365.2(a)(8)iv or 360.8(c)(8)(iv) X

7. ____ Containers holding ignitable and reactive wastes are located at least 15 meters (50 feet) from the facility's property line - 365.2(a)(8)v or 360.8(c)(8)(v) X

8. ____ The generator complies with the following special requirements related to storage of ignitable, reactive or incompatible wastes 365.2 (a)(8)vi: X

Special requirements related to storage of ignitable, reactive or incompatible wastes - 365.2(a)(10) and 360.8(c)(1)(v) X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(A) ____ Generator has taken precuations to prevent accidental ignition or reaction of ignitable or reactive waste - 365.2(a)(10)i and 360.8(c)(1)(v)(a) X

(B) ____ Generator has placed "No Smoking" signs conspicuously wherever there is a hazard from ignitable or reactive waste - 365.2(a)(10)i and 360.8(c)(1)(v)(a) X

(C) ____ The storage of ignitable or reactive wastes, and the mixture or comingling of incompatible wastes, or incompatible wastes and materials, is conducted to prevent - 365.2(a)(10)(ii) and 360.8(c)(9)(i) and 360.8(c)(1)(v) NA

(a) ____ the generation of extreme heat or pressure, fire or explosion, or violent reaction - 365.2(a)(10)(ii)a or 360.8(c)(1)(v)(b)(1) NA

(b) ____ production of uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health - 365.2(a)(10)(ii)(b) or 360.8(1)(v)(b)(4) NA

(c) ____ production of uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions - 365.2(a)(10)(ii)c or 360.8(c)(1)(v)(b)(3) NA

(d) ____ the damage to the structural integrity of the device or facility containing the waste - 365.2(a)(10)(ii)d or 360.8(c)(1)(v)(b)(4) NA

(e) ____ a threat to human health or the environment - 365.2(a)(10)(ii)e or 360.8(c)(1)(v)(b)(4) NA

D. Standards for management of tanks - 365.2(a)9

1. What are the approximate number and size of tanks containing hazardous waste?

They hold the acid fluoride waste in tanks (similar to Garbe tanks) approx 1x10⁶ tons sludge/month 25-cubic yard dumper

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

2. Identify the waste treated/stored in each tank. Include whether they are above or below ground.

NA

___ If the tanks are below ground, they can be entered for inspection. ___

Tank General Operating Requirements - 365.2(a)(9)i

3. ___ Hazardous wastes or treatment reagents are not placed in the tank, such that they could cause the tank or its inner liner to rupture, leak, corrode, or otherwise fail before the end of its intended life - 365.2(a)(9)(i)(a) or 360.8(c)(9)(i)(b). If so, please explain. NA

4. ___ There are no leaking tanks. X

(If tanks are leaking, describe the type, condition and number that are leaking or corroded. Be detailed and specific.)

5. ___ Uncovered tanks have at least 60 centimeters (2 feet) of freeboard or an adequate containment structure - 365.2(a)(9)(i)(b) or 360.8(c)(9)(i)(c) X

6. ___ Waste is continuously fed into a tank, but the tank is equipped with a means to stop the inflow from the tank (e.g., bypass system to a standby tank or a waste feed cutoff system) - 365.2(a)(9)i or 360.8(c)(9)(i)(d) X

Tank Inspections - 365.2(a)(9)ii

7. Tank(s) are inspected each operating day for:

(A) ___ discharge control equipment (e.g., waste feed cutoff systems, bypass systems and drainage systems) - 365.2(a)(9)(ii)(a) or 360.8(c)(9)(iii)(a)(1) X

(B) ___ monitoring equipment (e.g., pressure and temperature gauges) - 365.2(a)(9)(ii)(b) or 360.8(c)(9)(iii)(a)(2) NA

(C) ___ level of waste in tank to ensure proper freeboard - 365.2(a)(9)(ii)(c) or 360.8(c)(9)(iii)(a)(3) X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

8. Tank(s) are inspected weekly for:

___ Corrosion of leaking of fixtures or seams - 365.2(a)(9)(ii)(d) or 360.8(c)(9)(iii)(a)(4) — X

___ Erosion or obvious signs of leakage (e.g., wet spots or dead vegetation) of the construction materials of, and the area immediately surrounding discharge confinement structures (e.g., dikes). 365.2(a)(9)(ii)(e) or 360.8(c)(9)(iii)(a)(5) — X

9. Ignitable or reactive wastes - 365.2(a)(9)iii

(A) ___ Ignitable or reactive waste is placed in a tank and the waste is stored, treated, rendered or mixed before or immediately after placement in the tank so that the resulting wastes, mixture or dissolution of material is no longer ignitable or reactive-365.2(a)(9)(iii)(a) or 360.8(c)(9)(v)(a)(1) — NA

(B) ___ Ignitable and reactive waste is stored in a tank and the tank is used solely for emergencies - 365.2(a)(9)(iii)(a)3 or 360.8(c)(9)(v)(a)(3) — NA

(C) ___ Storage of ignitable or reactive waste in covered tanks does not comply with the National Fire Protection Association's (NFPA's) buffer zone requirements for tanks, contained in Tables 2-1 thru 2-6 of the "Flammable and Combustible Code, 1977." — NA

10.

(A) ___ Incompatible wastes, or incompatible wastes and materials, are placed in the same tank in compliance with 365.2(a)(10)ii - 365.2(a)(9)(iv)a or in compliance with 360.8(c)(1)(v)b - 360.8(c)(9)(vi)a — NA

(B) ___ Incompatible wastes are placed in an unwashed tank which previously held an incompatible waste or material in compliance with 365.2(a)(10)ii - 365.2(a)(9)(iv)b or in compliance with 360.8(c)(1)(v)b - 360.8(c)(9)(vi)b — NA

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(C) ___ The generator has abandoned use of a tank used to store hazardous waste and has removed from such tanks and related discharge control equipment and discharge confinement structures all hazardous waste and hazardous waste residues. NA

4. Manifest Records - 365.2(b)

A. ___ It appears, from the available information, that there is a manifest copy available for each hazardous waste shipment that has been made - 365.2(b)(5)i. X

If "violation" checked or "don't know," please elaborate.

_____

_____

_____

B. Describe the approximate size of an average shipment made and ___

how many shipments per month?

_____

C. Each manifest (a representative sample) has the following information: - 365.3(b) and 365.3(b)(1)i

	Generator	Transporter 1	Transporter 2	TSDF	
1. ___ Name of	___	___	___	___	___
2. ___ EPA ID No. of	___	___	___	___	___
3. ___ Mailing Address of	___	___	___	___	___
4. ___ Telephone No. of	___	___	___	___	___
5. ___ Manifest Document No.	___	___	___	___	___
6. ___ The proper USDOT description.					___

7. ___ The appropriate ___ quantity, ___ container no. ___ ___ container type, and ___ waste type by units of weight or volume.

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

8. ___ Signed certification that the materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation under regulations of the USDOT and NYSDEC - 365.2(a)3 and 365.2(a)4 and 365.2(a)5 — X

9. ___ Signature of transporter acknowledging receipt of materials — X

10. ___ Date of delivery and signature on the appropriate certification on the manifest - 365.3(b)(5)i — X

11. ___ Signed copies of the manifest records have been retained at the facility for at least three years - 365.3(b)(5)iii or 365.3(c)1 or 365.3(c)3 — X

D. ___ There is written communication that the designated treatment, storage or disposal facility is an authorized treatment, storage or disposal facility for the particular wastes being offered for shipment and has capacity to accept the hazardous waste set forth on the manifest - 365.2(b)(1)ii and 355.2(b)(1)iii — X

E. ___ The generator has distributed copies of the manifest as specified on the manifest form - 365.2(b)2 — X

F. International shipments - 365.5

(1) ___ EPA has been notified four weeks prior to shipment of hazardous waste destined for treatment, storage or disposal outside the United States - 365.5(b)(1) — NA

(2) ___ Delivery of the wastes has been confirmed within 90 days of acceptance of initial transporter - 365.5(b)2 — ___

(3) ___ The generator has identified the point of departure from the United States through which the waste must travel before entering a foreign country - 365.5(b)(3)ii — ___

(4) ___ Has complied with interstate shipments - 365.6 — ___

(5) ___ Has complied with shipments by rail or water (bulk) - 365.7 — ___

(6) ___ Has complied with shipments which involve the use of one or more transfer stations - 365.8 — ___

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

G. ____ Copies of all records have been kept for at least three years (e.g., annual reports, manifests, exception reports, sampling data) - 365.2(c)(1)i ____

H. ____ All records required under this subdivision were furnished upon request, or made available at a reasonable time for inspection - 365.2(c)(1)iv ____

I. ____ The generator has received signed copies (from the TSD facility) of all manifests for wastes shipped off-site more than 20 days ago: ____

____ If not, exception reports have been submitted covering these shipments - 365.2(c)(3) ____

5. Personnel Training - 365.2(a)(7)(ii)e and 360.8(c)(1)(vi)

A. There is a:

____ written description of the job title for each position at the facility related to hazardous waste management and name of the employee filling each job-360.8(c)(1)(vi)(d)1 X

____ written job description for each position 360.8(c)(1)(vi)(d)2 X

____ written description of the type and amount of both introductory and continuing training that will be given to each person related to hazardous waste management - 360.8(c)(1)(vi)(d)3 X

____ Records that document the training or job experience required 360.8(c)(1)(vi)(d)4 X

B. ____ The training program is directed by a person trained in hazardous waste management procedures and includes instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. 360.8(c)(1)(vi)(a)2. The components are: X

(1) ___ Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment; X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(2) ___ Key perameters for automated waste feed cutoff systems; X

(3) ___ Communications or alarm systems; X

(4) ___ Response to fires and explosions; X

(5) ___ Response to groundwater contamination incidents; and X

(6) ___ Shutdown of operations. X

C. ___ Facility personnel have successfully completed the program by the effective date of these regulations or six months after the date of their employment. 360.8(c)(1)(vi)b X

D. ___ Facility personnel have taken part in an annual review of the initial training required. 360.8(c)(1)(vi)c X

E. ___ Training records on current personnel have been kept permanently at the facility (until closure). 360.8(c)(1)(vi)e X

F. ___ Training records on former employees have been kept for at least three years from the date the employee last worked at a facility. 360.8(c)(1)(vi)e X

6. Preparedness and Prevention - 365.2(a)(7)(ii)e and 360.8(c)2

A. ___ The facility is maintained and operated to minimize the possibility of a fire or explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water - 360.8(c)(2)i X

B. ___ The facility is equipped with the following (Check missing equipment if needed in this facility's particular operations.) - 360.8(c)(2)ii X

(1) ___ An internal communication or alarm system capable of providing immediate emergency instruction (voice or signal) to facility; X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(2) ___ A device, such as a telephone or a hand-held, two-way radio capable of summoning emergency assistance from local police departments, fire departments or state or local emergency response teams; X

(3) ___ Portable fire extinguishers, fire control equipment. X

(4) ___ Water at adequate volume and pressure to supply water hose streams, or foam-producing equipment, or automatic sprinklers, or water spray systems. X

C. ___ Facility communications or alarm systems, fire protection equipment, and spill control equipment are tested and maintained as necessary to assure their proper operation in time of emergency - 360.8(c)(2)iii X

D. ___ Personnel involved in hazardous waste operations have immediate access to an internal alarm or emergency communication device 360.8(c)(2)iv X

E. ___ The facility has the required aisle space - 360.8(c)(2)v (Inspections should be able to be made of each drum and space should be sufficient to fight a fire). X

F. ___ The facility owner or operator has made an attempt in good faith to make the following arrangements with local authorities, as appropriate for the type of waste handled at the facility and the potential need for the services of these organizations - 360.8(c)(2)vi:

(1) ___ Arrangements to familiarize police, fire departments and emergency response teams with the functions and layout of the facility; X

(2) ___ Where more than one police and fire department might respond to an emergency, an agreement designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to primary emergency authority; X

(3) ___ Agreements with government emergency response teams, emergency response contractors, and equipment suppliers; X

(4) ___ Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illness which could result from fires, explosions or releases at the facility; and X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(5) ___ Where state or local authorities decline to enter into such arrangements, the owner or operator has documented the refusal in the operating record. X

7. Contingency Plan and Emergency Procedures - 365.2(a)(7)(ii)e and 360.8(c)3

A. ___ The facility has a contingency plan - 360.8(c)(3)(i)a X

B. ___ The following are included in the contingency plan - 360.8(c)(3)ii X

(1) ___ A description of actions facility personnel must take in response to fires, explosions or any unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil or surface water; X

(2) ___ A spill prevention, control, and countermeasure (SPCC) plan in accordance with Part 112 or Part 151 of 40 CFR, or some other emergency or contingency plan, amended to incorporate hazardous waste management provisions that are sufficient; X

(3) ___ A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services; X

(4) ___ Names, addresses and phone numbers of all persons qualified to act as emergency coordinator; X

(5) ___ A list of all emergency equipment at the facility, and decontamination equipment, where this equipment is required; X

(6) ___ The location and the physical description of each item on the list, and a brief outline of its capabilities; X

(7) ___ An evacuation plan for facility personnel, where there is a possibility that evacuation could be necessary. X

C. ___ Copies of the contingency plan are maintained at the facility - 360.8(c)(3)(iii)a X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

D. ____ Copies of the contingency plan have been submitted to all local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services - 360.8(c)(3)(iii)b — X

E. ____ The contingency plan has been amended - 360.8(c)(3)iv — X

F. ____ There was at least one employee either on the facility premises or on call with the responsibility for coordinating all emergency response measures - 360.8(c)(3)v — X

G. ____ During a past emergency situation the emergency coordinator or) his designee when the emergency coordinator is not on call) immediately activated emergency procedures - 360.8(c)(3)vi — NA

The following was done:

(1) ___ Activated internal facility alarms or communication systems; ____

(2) ___ Notified appropriate state or local agencies; ____

(3) ___ Immediately identified the character, extent, exact source, amount and areal extent of any released materials; ____

(4) ___ The emergency coordinator assessed possible hazardous to human health and the environment; ____

(5) ___ The emergency coordinator, after determining that the facility had a release, fire or explosion which could threaten human health or the environment outside the facility, reported his findings; ____

(6) ___ During the emergency, the emergency coordinator took all reasonable measures necessary to ensure that fire, explosions and releases do not occur, recur or spread to other hazardous waste; ____

(7) ___ The emergency coordinator monitored for leaks, pressure buildup, gas generation or ruptures in valves, pipes or other equipment, where appropriate during the facility's response to the emergency; ____

Indicate:			Indicate:
X Violations			X Satisfactory NA Not Applicable
(8)	___	The emergency coordinator provided for treating, storing or disposing of recovered waste, contaminated soil or surface water, or any other material that resulted from a release, fire or explosion at the facility;	___
(9)	___	The emergency coordinator ensured that in the affected area no waste that may be incompatible with the released material was treated, stored or disposed of prior to cleanup procedures being completed;	___
(10)	___	The emergency coordinator ensured that all emergency equipment listed in the contingency plan was cleaned and fitted for its intended use before operations were resumed;	___
(11)	___	The owner or operator notified the Commissioner that the facility is in compliance before operations were resumed in the affected areas of the facility;	___
(12)	___	The owner or operator noted in the operating record the time, date and details of the incident that required implementation of the contingency plan;	___
(13)	___	The owner or operator submitted a written report or complete written report on the incident within 15 days after the incident occurred.	___

- IBM Corp - Fishkill
NYD000 207 901 - Region 3 -

New York State Department of Environmental Conservation
Division of Solid and Hazardous Waste
Bureau of Hazardous Waste Operations
50 Wolf Road, Albany, New York 12233

Appendix A

Treatment, Storage and Disposal Inspection Section

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

1. Modifications

There have been the following modifications to existing facilities with a proper application to DEC:

(A) ___ Expansion of the facility by the acquisition (by purchase, lease or otherwise) of additional land - 360.3(c)(1)(ii)a — NA

(B) ___ Movement of the disposal operation to a portion off property already owned, leased or otherwise held by such person - 360.3(c)(1)(ii)b — NA

(C) ___ Increase of the total quantity of solid waste received during any quarter at the facility by fifty (50) percent or more over the total quantity of solid waste received during the comparable quarter of the preceding year (except where such increase is not in excess of the approved design capacity of the facility for such time period - 360.3(c)(1)(ii)c — NA

(D) ___ Expansion of the facility by the installation of additional processing equipment which increases the approved design capacity of the facility or changes the facility process - 360.3(c)(1)(ii)d — NA

(E) ___ Addition of any solid waste stream or solid waste type not previously approved, or any change in solid waste type accepted at the facility, other than for resource recovery facilities - 360.3(c)(1)(ii)e — NA

Requirements for Hazardous Waste Management Facilities

2. Owner Transfer

(A) ___ The facility has transferred ownership or operation of facility with prior written approval of the Department - 360.8(c)(1)(i)(a). — NA

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(B) ___ Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, the owner or operator notified the new owner or operator in writing of the requirements - 360.8(c)(1)(i)(b). NA

3. Sampling

(A) ___ The owner or operator obtained a sample of the waste and had it analyzed - 360.8(c)(1)(ii)(a)(1); or NA

(B) ___ The analysis included data developed under Part 366 of this Title, and existing published or documented data on the hazardous waste or on waste generated from similar processes - 360.8(c)(1)(ii)(a)2 NA

(C) ___ The analysis has been repeated as necessary to ensure that it is accurate and up to date-360.8(c)(1)(ii)(a)(3) NA

4. Waste Analysis Plan -

(A) ___ The owner or operator has developed and followed a written waste analysis plan - 360.8(c)(1)(ii)b X

(B) ___ The owner or operator keeps this plan at the facility. X

(C) ___ The plan specifies at a minimum:

(1) ___ The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters - 360.8(c)(1)(ii)(b)1 X

(2) ___ The test methods which will be used to test for these parameters - 360.8(c)(1)(ii)(b)2 X

(3) ___ The sampling method which will be used to obtain a representative sample of the waste to be analyzed - 360.8(c)(1)(ii)(b)3 X

(4) ___ The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up to date - 360.8(c)(1)(ii)(b)4 X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(5) ___ For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply - 360.8(c)(1)(ii)(b)5 — X

(6) ___ Where applicable, the methods which will be used to meet the additional waste analysis requirements for the specific waste management methods as specified in: — X

- 360.8(c)(9)(ii) Tanks - Waste analysis and trial tests

(7) (For off-site facilities) The waste analysis plan required must also specify the procedures which will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identity of the waste designated on the accompanying manifest or shipping paper. The plan describes, at a minimum:

(a) ___ The procedure which will be used to determine the identity of each movement of waste managed at the facility - 360.8(c)(1)(ii)(c)(1); and — NA

(b) ___ The sampling method which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling - 360.8(c)(1)(ii)(c)1 — NA

5. Security - 360.8(c)(1)iii

(A) The owner or operator has adequately prevented the unknowing entry, or minimized the possibility for the unauthorized entry, of persons or livestock onto the active portion of his facility, because:

(1) ___ Physical contact with the waste, structures or equipment, or with the active portion of the facility may injure unknowing or unauthorized persons or livestock which may enter the active portion of a facility - 360.8(c)(1)(iii)(a)1 — X

(2) ___ Disturbance of the waste or equipment, by the unknowing or unauthorized entry of persons or livestock onto the active portion of a facility, may cause a violation of the requirements - 360.8(c)(1)(iii)(a)2 — X

(B) If not exempt under A1 or A2 above, the facility must have the following:

Indicate:		Indicate:
X	Violations	X Satisfactory NA Not Applicable

(1) ___ A 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility - 360.8(c)(1)(iii)(b)1 or — X

(2) ___ An artificial or natural barrier which completely surrounds the active portion of the facility - 360.8(c)(1)(iii)(b)(2)(i) and — X

___ A means to control entry, at all times, through the gates or other entrances to the active portion of the facility - 360.8(c)(1)(iii)(b)(2)(ii) — X

(C) ___ If not exempt under A1 or A2 above, the facility must have the following:

(1) ___ A sign with the legend, "Danger - Unauthorized Personnel Keep Out" posted at each entrance to the active portion of a facility, and at other locations, in sufficient numbers to be seen from any approach to that active portion. — X

6. General Inspection Requirements - 360.8(c)(1)(iv)

(A) ___ The owner or operator has inspected the facility for malfunctions and deterioration, operator errors, and discharges which may be causing - or may lead to release of hazardous waste constituents to the environment, or a threat to human health - 360.8(c)(1)(iv)(a) — X

(B)(1) The owner or operator has developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that are important to preventing, detecting or responding to environmental or human health hazards - 360.8(c)(1)(iv)(b(1) — X

(2) ___ He has not kept the written inspection schedules at the facility - 360.8(c)(1)(iv)(b)(2) — X

___ The schedule identifies the types of problems which are to be looked for during the inspection - 360.8(c)(1)(iv)(b)(3) — X

___ The frequency of inspection is based on the rate of possible deterioration of the equipment and the probability of an environmental or human health incident, if the deterioration or malfunction or any operator error goes undetected between inspections - 360.8(c)(1)(iv)(b)(4) — X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(C) ___ The owner or operator has remediated deterioration or malfunction of equipment or structures which the inspection has revealed. X

(D) ___ The owner or operator has recorded inspections in an inspection log or summary. X

(E) ___ The inspection log or summary has been kept for at least three years from the date of inspection. X

(F) ___ The records, at a minimum, include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions. X

7. Ignitable or reactive wastes - Complete Part II 3 C 8 and 3 D 9.

8. Personnel Training - Complete Part II 5.

9. Preparedness and Prevention - Complete Part II 6

10. Contingency Plan and Emergency Procedures - Complete Part II 7

11. Manifest system, recordkeeping and reporting - 360.8(c)4

The regulations in this paragraph apply to the owners and operators of all hazardous waste facilities.

A. Operating Record

(1) ___ There is an operating record. X

(2) ___ The owner or operator has kept a written operating record at his facility. X

(3) The following information is included in the operating record, as it becomes available, or maintained in the operating record until closure of the facility:

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(a) ___ A description and the quantity of each hazardous waste received; X

(b) ___ The method(s) and date(s) of its treatment, storage or disposal at the facility; X

(c) ___ The location of each hazardous waste within the facility and the quantity at each location; X

(d) ___ (For disposal facilities) The location and quantity of each hazardous waste must be recorded on a map or diagram of each cell or disposal area. X

(e) ___ Information must include cross references to specific manifest document numbers, if the waste was accompanied by a manifest; X

(f) ___ Records and results of waste analyses and trail tests performed; X

(g) ___ Summary reports and details of all incidents that require implementing the contingency plan; X

(h) ___ Records and results of inspections; X

(i) ___ Monitoring, testing or analytical data; X

(j) ___ All closure cost estimates. X

(k) ___ (For disposal facilities) All post-closure cost estimates. X

B. Manifest

(1) Upon receipt of manifested shipment of hazardous waste the owner or operator: NA

(a) ___ determined significant discrepancies from those stated on the manifest - 365.4(b)(1)(i) NA

(b) ___ determined that all portions of the manifest have been completed - 365.4(b)(1)(ii), Explain _____ NA

_____

_____

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(c) ___ complete and distribute copies of the manifest as indicated in the instructions with the manifest form - 365.4(b)(1)(iii) NA

(2) Upon receipt of an unmanifested shipment of hazardous waste the owner and operator: NA

(a) ___ determined the reason why the shipment was not accompanied by a manifest - 365.4(b)(2)(i) NA

(b) ___ filed an unmanifested waste report after accepting the waste - 365.4(b)(2)(iii) NA

(3) ___ Facility accepted a particular hazardous waste without an authorized permit to do so - 365.4(b)(5)(i) NA

(4) ___ Facility accepted a hazardous waste without having adequate treatment, storage or disposal capacity available. NA

C. Annual report

1. ___ The owner or operator retained annual reports for the last three years 365.4(c)(3)(i). X

D. Additional reports - 360.8(c)(4)(iv)

In addition to submitting the annual report and unmanifested waste reports described in Subparagraph 360.8(c)(4)(iii), Paragraphs 365.4(c)(2) and 365.7(c)(2), of this Title, the owner or operator must also report to the Commissioner:

(A) ___ Releases, fires and explosions as specified in Clause 360.8(c)(3)(vi)(j) - 360.8(c)(4)(iv)a NA

(B) ___ Groundwater contamination and monitoring data as specified in subparagraphs 360.8(c)(5)(iv) and 360.8(c)(5)(v) - 360.8 (c)(4)(iv)b NA

(C) ___ Facility closure as specified in Subparagraph 360.8(c)(6)(v) - 360.8(c)(4)(iv)c NA

E. Availability, retention and disposition of records

(1) ___ All records, including plans, required under this Part are furnished upon request, and made available at all reasonable times for inspection - 360.8(c)(4)(ii)(a). X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(2) ___ All reports and records required were retained for three years from the date of submittal - 365.4(c)(3)(i) X

(3) ___ Upon closure of the facility, a copy of records of waste disposal locations and quantities under Subclause 360.8(c)(4)(i)(b)(2) was submitted to the Commissioner and the county clerk's office of the county in which the facility is located - 360.8(c)(4)(ii)(c). X

12. Groundwater monitoring. - 360.8(c)5

(A) ___ A groundwater monitoring plan is required. ___

(B) ___ ATTACH COMPLETED GROUNDWATER MONITORING QUESTIONNAIRE - APPENDIX A ___

(C) ___ A groundwater monitoring program is required, and has been instituted. ___

Remedial Program in exchange of the groundwater program. They have a lot of wells

13. Closure and post-closure. - 360.8(c)6

(A) ___ The owner or operator has a written closure plan - 360.8(c)(6)(ii)(a) X

(1) ___ The plan is kept at the facility-360.8(c)(6)(ii)(a) X

(2) The plan identifies:

(a) ___ How and when the facility will be ___ partially closed if applicable, and ___ ultimately closed - 360.8(c)(6)(ii)(a)(1) X

(b) ___ The maximum extent of the operation which will be unclosed during the life of the facility - 360.8(c)(6)(ii)(a)(1) X

(c) ___ The manner to close the facility that minimizes the need for further maintenance - 360.8(c)(6)(ii)(a)(1) X

(d) ___ All the hazardous waste and hazardous waste residues that must be removed from tanks, discharge control equipment, and discharge confinement structures - 360.8(c)(9)(iv). X

(e) ___ An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the life of the facility - 360.8(c)(6)(ii)(a)(2) X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(f)___ A description of the steps needed to decontaminate facility equipment during closure - 360.8(c)(6)(ii)(a)(3) ___X___

(g) A schedule for final closure including:

___The anticipated date when wastes will no longer be received - 360.8(c)(6)(ii)(a)(4) ___X___

___The date when completion of the final closure is anticipated - 360.8(c)(6)(ii)(a)(4) ___X___

___Intervening milestone dates which will allow tracking of the progress of closure -360.8(c)(6)(ii)(a)(4) ___X___

(B)___ The owner or operator has amended his plan when changes in operating plans or facility design affect the closure plan - 360.8(c)(6)(ii)(b) ___NA___

(C)___ The owner or operator has submitted his closure plan to the Commissioner at least 180 days before the date he expects to begin closure - 360.8(c)(6)(ii)(c) ___NA___

NOTE: The following (13D - 13J) are for owners and operators of disposal facilities only.

(D) Post-closure care consists of at least:

1. ___ Groundwater monitoring and reporting - 360.8(c)(6)(vi)(a)(1) ___

2. ___ Maintenance of monitoring and waste containment systems - 360.8(c)(6)(vi)(a)(2) ___

3. ___ Maintenance of any or all of the security requirements if required by the Commissioner - 360.8(c)(6)(vi)(b) ___

(E) Post-closure use of property on or in which hazardous waste remains after closure is disturbing the integrity of the ___ final cover, ___ liner(s), or ___ other components of any containment system, or ___ the function of the facility's monitoring systems, and the owner or operator has demonstrated to the Commissioner, either in the post-closure plan or by petition, that the disturbance:

1. ___ Is necessary to the proposed use of the property, and will not increase the potential hazard to human health or the environment - 360.8(c)(6)(vi)(c)(1) ___

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

2. ___ Is necessary to reduce a threat to human health or the environment - 360.8(c)(6)(vi)(c)(2). ___

(F) ___ Some or all of the requirements for post-closure care have discontinued or altered before the end of the 30-year period with approval - 360.8(c)(6)(vi)(d) ___

(G) ___ The owner or operator of a disposal facility has a written post-closure plan - 360.8(c)(6)(vii)(a) ___

(H) ___ The owner or operator of a disposal facility keeps this plan at the facility - 360.8(c)(6)(vii)(a) ___

(I) This plan identifies:

1. ___ Groundwater monitoring activities and frequencies - 360.8(c)(6)(vii)(a)(1) ___

2. ___ Maintenance activities and frequencies - 360.8(c)(6)(vii)(a)(2) ___

(J) ___ The owner or operator has amended his post-closure plan, and changes have occurred in operating plans or facility designs which affect his post-closure plan - 360.8(c)(6)(vii)(b) ___

14. Financial requirements - 360.8(c)7

(A)___ The owner or operator has a written estimate of the cost of closing the facility. X

(B)___ The owner or operator has kept this estimate, and all subsequent estimates required at the facility. X

(C)___ The estimate appears to equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure the most expensive, as indicated by its closure plan. (PLEASE EXPLAIN) X

(D)___ The owner or operator has prepared a new closure cost estimate whenever a change in the closure plan affects the cost of closure. X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(E)___ On each anniversary of the effective date of these regulations, the owner or operator has adjusted the latest closure cost estimate. X

(FOR OWNERS AND OPERATORS OF DISPOSAL FACILITIES)

(F)___ The owner or operator of a disposal facility has a written estimate of the annual costs of post-closure monitoring and maintenance of the facility. ____

(G)___ The owner or operator has kept this estimate, and all subsequent estimates required in this Section, at the facility. ____

(H)___ The owner or operator has prepared an annual post-closure cost estimate whenever a change in the post-closure plan affects the cost of post-closure care. ____

(I)___ On each anniversary of the effective date ef these regulations, during the operating life of the facility, the owner or operator has adjusted the latest post-closure cost estimate. ____

15. Use and management of containers. - 360.8(c)8

(A) Complete Part 11-3 C

(B)___ Incompatible wastes, or incompatible wastes and materials, are placed in the same container. - 360.8(c)(8)(vi)a NA

(C)___ Hazardous waste is not placed in an unwashed container that previously held an incompatible waste or material. - 360.8(c)(8)(vi)(b) NA

(D)___ A storage container holding a hazardous waste that is incompable with any waste or other materials stored nearby in other containers, piles, open tanks or surface impoundments, is separated from the other materials or protected from them bv means of a dike, berm, wall or other device. - 360.8 (c)(8)(vi)c NA

16. Tanks. - 360.8(c)9

(A) Complete Part II-3D

(B) The tank is to be used to chemically treat or store a hazardous waste which is substantially different from waste previously treated or stored in that tank, and the owner or operator has, before treating or storing the different waste or using the different process:

(1)___ Conducted waste analyses and trial treatment or storage tests (e.g., bench scale or pilot plant scale tests - 360.8(c)(9)(ii)(a)(1)(i) or NA

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(2)___ obtained written, documented information on similar storage or treatment of similar waste under similar operating conditions - 360.8(c)(9)(ii)(a)(1)(ii) NA

(C) Chemically treat hazardous waste with a substantially different process than any previously used in that than, and the owner or operator not, before treating or storing the different waste or using the different process:

(1)___ Conducted waste analyses and trail treatment or storage tests (e.g., bench scale or pilot plant scale tests) - 360.8(c)(9)(ii)(a)(2)(i) or NA

(2)___ Obtained written, documented information on similar storage or treatment of similar waste under similar operating conditions. - 360.8(c))9)(ii)(a)(2)(ii) NA

Handler Name IBM Corp. Fishkill
EPA I.D. No. NYD002127201

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

APPENDIX K

Underground injection.

Except as Paragraph 360.8(c)(6) provides otherwise:

A. ___ The owner or operator of this facility which disposes of hazardous waste by underground injection is excluded from the requirements of Paragraphs 360.8(c)(6) and 360.8(c)(7) of this Part. NA

B. ___ The requirements of this paragraph apply to this owner and operator of a well used to dispose of hazardous waste wch is classified as Class I under Subdivision 122.32(a) of 40 CFR and which is classified as Class IV under Subdivision 122.32(d) of 40 CFR. The requirements are being met. NA

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

U ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F N Y D 0 0 0 7 0 7 9 0 1 3 D

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X		
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: INTERNATIONAL BUSINESS MACHINES CORP.

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 STEWART ARTHUR D MGR DEPT 77D	914 897 7100

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX: 3 EAST FISHKILL FACILITY RTE 52

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 HOPEWELL JUNCTION	NY	12533

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER: 5 ROUTE 52

B. COUNTY NAME: DUTCHESS

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6 EAST FISHKILL	NY	12533	

CONTINUE ON REVERSE

TINUED FROM THE FRONT

SIC CODES *(4-digit, in order of priority)*

A. FIRST: 3674 (specify) Semiconductors & Related devices

B. SECOND: 7573 (specify) Electronic Computing Equipment

C. THIRD: (specify)

D. FOURTH: (specify)

. OPERATOR INFORMATION

A. NAME: INTERNATIONAL BUSINESS MACHINES CORP

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR *(Enter the appropriate letter into the answer box; if "Other", specify.)*
F = FEDERAL; S = STATE; P = PRIVATE; M = PUBLIC *(other than federal or state)*; O = OTHER *(specify)*: P (specify)

D. PHONE *(area code & no.)*: A 914 897 7100

E. STREET OR P.O. BOX: EAST FISHKILL FACILITY RTE 52

F. CITY OR TOWN: HOPEWELL JUNCTION

G. STATE: NY

H. ZIP CODE: 12533

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES *(Discharges to Surface Water)*: N 0005096

B. UIC *(Underground Injection of Fluids)*: U

C. RCRA *(Hazardous Wastes)*: R

D. PSD *(Air Emissions from Proposed Sources)*: P

E. OTHER *(specify)*: NY 0107603 (specify) ~~Effluent Discharge from~~ fuel storage & gas turbine areas

E. OTHER *(specify)*: (specify) See Attachment

Applied for permit for mobile emerg. generator units 8/6/80, to EPA Region II

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. F9:A/50

XII. NATURE OF BUSINESS *(provide a brief description)*

Manufacturing and Development of Semi-Conductor Devices.

F9:A/51

XIII. CERTIFICATION *(see instructions)*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE *(type or print)*: John F. Bertram

B. SIGNATURE: John F Bertram

C. DATE SIGNED: 11/13/80

COMMENTS FOR OFFICIAL USE ONLY

C

3

EPA Form 3510-1 (6-80) REVERSE

International Business Machines Corporation

East Fishkill Facility, Route 52
Hopewell Junction, New York 12533
914/897-2121

November 13, 1980

Mr. Harry Ruisi
EPA Region II
Information Service Center
26 Federal Plaza
New York, New York 10007

Dear Mr. Ruisi:

Pursuant to the requirements of the Resource Conservation and Recovery Act (RCRA), I am attaching IBM East Fishkill Facility's Part A permit application. There are three completed Part A application forms -- one for the main East Fishkill Facility and two for our leased satellite locations. The attachments submitted with the three applications are listed on the enclosed table.

I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I have personally examined and am familiar with the information being submitted in the attached document and all attachments and, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete.

Very truly yours,

J. E. Bertram
President
Data Systems Division

npm
Attachments

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM **3** RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

1	2	3	4	5	6	7	8	9	10	11	12	T/A 13	C 14	15
F	N	Y	D	0	0	0	7	0	7	9	0	1	3	1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24 - 29	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 71 **1. EXISTING FACILITY** *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] 71 **2. NEW FACILITY** *(Complete item below.)*

C	YR.	MO.	DAY
8	6 3	0 8	1 5
15	73 74	75 76	77 78

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* **OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED** *(use the boxes to the left)*

YR.	MO.	DAY
73 74	75 76	77 78

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* **OPERATION BEGAN OR IS EXPECTED TO BEGIN**

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 72 **1. FACILITY HAS INTERIM STATUS**

[ ] 72 **2. FACILITY HAS A RCRA PERMIT**

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code*(s)* in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C).*

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR OR GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in [illegible] Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below):* A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

1	2	3	T/A 13	C 14
C	D	U	P	1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G		5	T01	7,500,000	U	
X-2	T03	20	E		6				
1	S01	100,000,000	G		7				
2	S01	35,000,000	G		8				
3	S02	324,000,000	G		9				
4	T01	~~1,500,000~~ 999999999	U		10				

Continued from the front.

II. PROCESSES *(continued)*

SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")* FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

V. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. **PROCESSES**

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*	D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				*included with above*

Continued from page 2.

NOTE: Photocopy this page before completing if have more than 26 wastes to list.

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EPA I.D. NUMBER (enter from page 1)	T/A	C	FOR OFFICIAL USE ONLY	T/A	C	
W N Y D 0 0 0 7 0 7 9 0 1	3	1	W DUP	3	2	DUP

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

LINE NO.	A. EPA HAZARD. WASTE NO. *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*				D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
1	P005	40,000 000	K	S01	S02			
2	P011							~~Included with above~~
3	P012							
4	P016							
5	P022							
6	P030							
7	P053							
8	P095							
9	P096							
10	P098							
11	P106							
12	P120							
13	U001							
14	U002							
15	U004							
16	U009							
17	U013							
18	U019							
19	U023							
20	U031							
21	U037							
22	U043							
23	U044							
24	U045							
25	U052							
26	U056							

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1): NYD000707901 T/A 3 C 1

FOR OFFICIAL USE ONLY: W DUP T/A 3 2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	U057				~~Included with Above~~
2	U070				
3	U112				
4	U122				
5	U123				
6	U134				
7	U135				
8	U140				
9	U144				
10	U147				
11	U151				
12	U154				
13	U159				
14	U161				
15	U188				
16	U190				
17	U196				
18	U197				
19	U210				
20	U211				
21	U213				
22	U220				
23	U226				
24	U228				
25	U239				
26	F001	5,000,000 00	K	S01 S02	

CONTINUE ON REVERSE

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1): WNYD007079013

FOR OFFICIAL USE ONLY: W DUP 32 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F002				~~Included with Above~~
2	F003				
3	F004				
4	F005				
5	F007	850,000 000	K	S01 S02	
6	F009				~~Included with Above~~
7	D002				
8	D003				
9	D008				
10	D002	400,000 000	K	S01 S02	
11	D008				~~Included with Above~~
12	D006	60,000 000	K	S01	
13	D002	30,000 000	K	S01	
14	D009				Included with Above
15	D004	20,000 000	K	S01	
16	D008	60,000 000	K	S01	
17	D004	40,000 000	K	S01	
18	D001	50,000 000	K	S01	
19	D009	10,000 000	K	S01	
20	F006	6,000,000 00	K	S01	
21	D003	10,000 000	K	S01	
22					
23					
24					
25					
26					

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

Continued from the front.

. DESCRIPTION OF HAZARDOUS WASTE (continued)

. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE .

F6:A 55 F6:A 56

EPA I.D. NO. (enter from page 1)

S	N	Y	D	0	0	0	7	0	7	9	0	1	T/A 3	C 6
1	2											13	14	15

. FACILITY DRAWING

All **existing** facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

I. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

II. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
41 33 35 0 (65 66 67 68 69 - 71)	073 50 00 0 (72 - 74 75 76 77 - 79)

III. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
C (16 - 55)	(56 - 58 59 - 61 62 - 65)

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
C (16 - 42)	C G (15 16 - 40)	(41 42)	(47 - 51)

X. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
John E. Bertram	✓ John E Bertram	11/13/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
X John E. Bertram	✓ John E Bertram	11/3/80

2000-0356
9/30/83

CLOSURE AND POST-CLOSURE COMPLIANCE REVIEW CHECKLIST

I. GENERAL FACILITY INFORMATION

EPA ID # NY 0000707901

Address EAST FISHKILL FACILITY, RTE 52

HOPEWELL JUNCTION, NY 12533

Owner INTERNATIONAL BUSINESS MACHINES (914) 897-7100
(name and phone number)

Operator H.W. SHIMMIN JR. (914) 897-7707
(name and phone number)

Name of Facility INTERNATIONAL BUSINESS MACHINES CORP.

Date & Time of Inspection 9/1/82 11:00 AM

Personnel Present WILLIAM CAREY, KAMLESH GUPTA

ERTEC: RONALD PETHERBRIDGE

Notes:

Type of Facility (check all that apply/fill-in blanks)

☐* ✓ Storage ✓ Treatment ____ Disposal

			Active	Inactive	Planned
☐	✓	Containers	see comments (number and volume)		
☐	✓	Tanks	see comments (number and volume)		
☐	____	Piles	(number and volume)		
☐	____	Incinerator	(gallons or tons per hour)		
☐	____	Landfill	(acres and volume)		
☐	____	Land Treatment	(acres and volume)		
☐	____	Surface Impoundment	(acres and volume)		
☐	____	Chemical/Physical/ Biological Treatment	(gallons or tons per hour)		
☐	____	Thermal Treatment	(gallons or tons per hour)		
☐	____	Underground Injection	(nominal operating rate)		

Describe tank and container conditions (e.g., age, remaining surface life, etc.) in Comments section.

*Checkboxes indicate items to be reviewed during on-site visit.

OMMENTS

1. Industrial Wastewater Treatment Facility : Contains 4 tanks for waste treatment and 4 tanks for storage of decontamination rinse waters. The total volume is 579,650 gallons.

2. Hydrofluoric acid / Heavy metal Collection + Treatment System : Contains 23 tanks listed in the maximum inventory list, 5 of which are used for waste treatment. From the inspection, 5 additional waste treatment tanks were noted; ~~five~~ four of which were 5,000 gallons each and one which was 1,000 gallons. The total volume of the 23 listed tanks is 337,486 gallons. Tank #165 holds 10,000 gallons as shown on the tank label, not 1,000 gallons as listed in the inventory. However, tank # 165 was underground and could not be visually inspected.

3. Waste Solvent Storage : The inventory lists shows 24 tanks; however, from the site inspection only 17 tanks were noted as being used for storage of solvents. In addition 3 other tanks, #123, 124, 125, were not shown in the inventory which would make the total number of tanks be 20. The total volume of the 17 listed tanks is 110,900 gallons, the volumes were not determined during the site inspection of the 3 additional tanks. Of the 24 inventoried tanks, tanks # 139-143 were never used and are not planned for use, tank # 158 is for ~~waste~~ recycled material and tank # 107 is a spill tank for virgin material not waste.

* Note : If the facility's wastewater treatment systems are exempt from closure under 265.1(c)(10), then all the affiliated tanks listed under 1 and 2 above may be exempt from the closure regulations unless the final wastes are not treated on-site upon closure.

COMMENTS

4. Drum Storage: The maximum inventory is 2000 drums (50 gal drums) with a total volume of 100,000 gallons. From visual inspection only approximately 1200 drums can be stored on-site at one time.

5. Waste Oil Storage: From the site inspection an oil-water separator tank was seen that was not included in the inventory (tank # 155, 1500 gal). The inventried tank, tank # 156, was labeled to contain 3000 gallons not the 550 gallons listed in the inventory. However, the tank was underground and could not be visual inspected. The total volume of both tanks is 4500 gallons.

* The tanks all appear to be in good shape, but the time period of expected life of each tank has not been determined.

II. WRITTEN PLAN

★	1. Is there a WRITTEN CLOSURE PLAN kept at the facility? (40 CFR 265.112(a))	(YES)	NO	
	2. Does the closure plan cover all areas and facilities that were ACTIVE as of 11/19/80?	YES	(NO)	see comments
	3. Does the closure plan include general information about the facility which would be helpful in reviewing the plan, including:			
	a. facility size(s)	(YES)	NO	
	b. facility type(s)	(YES)	NO	
	c. descriptions of all on-site equipment	(YES)	NO	
	d. topography	YES	(NO)	
	e. waste characterization	(YES)	NO	
	f. soil type	YES	(NO)	
	g. description of surrounding land use	YES	(NO)	
	h. surrounding population	YES	(NO)	
	i. size of facility (acres)	YES	(NO)	
	j. volume of impoundment	YES	NO	(N/A)
	k. type(s) of treatment/processing	(YES)	NO	N/A
	l. description of liner	YES	NO	(N/A)
	m. leachate collection system	YES	NO	(N/A)
	n. gas collection system	YES	NO	(N/A)
	o. dredging procedures/schedules, etc.	YES	NO	(N/A)
	p. incinerator specifications	YES	NO	(N/A)
	q. other (specify _____)	YES	NO	

III. MAXIMUM EXTENT OF OPERATION

★	1. Does the plan identify the MAXIMUM EXTENT OF OPERATION which will be unclosed during the life of the facility? (40 CFR 265.112(a)(1))	(YES)	NO	
□	2. Is the MAXIMUM EXTENT OF OPERATION estimate exceeded by current operations?	YES	(NO)	
□	3. Does the MAXIMUM EXTENT OF OPERATION estimate include:			
	a. the maximum area of landfill or land treatment ever containing wastes?	YES	NO	(N/A)
	b. inactive areas open because of operating problems or contingencies?	YES	NO	(N/A)
	c. maximum area of land ever used for land spreading?	YES	NO	(N/A)

d.	the most extensive treatment required for land spreading?	YES	NO	(N/A)
e.	the maximum area used for storage?	(YES)	NO	N/A

Explain each "NO" answer in comment section.

IV. PARTIAL CLOSURE

★ 1. Does the plan identify the steps for PARTIAL CLOSURE, at any time during the intended operating life, of

a.	surface impoundments?	YES	NO	(N/A)
b.	landfills?	YES	NO	(N/A)
c.	tanks?	YES	(NO)	N/A
d.	other (specify: CONTAINERS (DRUMS)) (40 CFR 265.112(a))	YES	(NO)	

IF NO PARTIAL CLOSURE PLAN, CIRCLE (N/A) AND SKIP TO SECTION V. see comments

2. Does the PARTIAL CLOSURE plan identify

a.	the size of areas partially closed?	YES	NO	N/A
b.	procedures for partial closure?	YES	NO	
c.	maintenance program?	YES	NO	
d.	frequency of partial closures?	YES	NO	
e.	source of cover materials?	YES	NO	N/A

□ 3. Does the plan for PARTIAL CLOSURE demonstrate the adequacy of the cap, etc. to meet the closure requirements? YES NO

OR

Are these areas or activities otherwise included in the extent of operations of the closure plan? YES NO

4. Does the PARTIAL CLOSURE PLAN describe maintenance activities for partially closed areas, including:

a.	visual inspections?	YES	NO	N/A
b.	ground-water monitoring?	YES	NO	N/A
c.	maintaining cover?	YES	NO	N/A
d.	maintaining diversion structures?	YES	NO	N/A
e.	controlling erosion?	YES	NO	N/A
f.	maintaining vegetation?	YES	NO	N/A
g.	security requirements?	YES	NO	N/A
h.	leachate collection?	YES	NO	N/A
i.	gas collection?	YES	NO	N/A

5. Does the PARTIAL CLOSURE PLAN describe maintenance frequencies for partially closed areas, including:

a.	visual inspections?	YES	NO	N/A
b.	groundwater monitoring?	YES	NO	N/A
c.	maintaining the cover?	YES	NO	N/A
d.	maintaining diversion structures?	YES	NO	N/A
e.	controlling erosion?	YES	NO	N/A
f.	maintaining vegetation?	YES	NO	N/A
g.	security requirements?	YES	NO	N/A
h.	leachate collection?	YES	NO	N/A
i.	gas collection?	YES	NO	N/A

6. Is there a SCHEDULE FOR PARTIAL CLOSURE? If "NO" SKIP TO SECTION V. YES NO

7. Does the SCHEDULE FOR PARTIAL CLOSURE include:

★ a.	date(s) of partial closure(s)? (40 CFR 265.112(a)(1))	YES	NO	
b.	total time required for each partial closure?	YES	NO	
c.	time required for key steps--			
i.	waste removal?	YES	NO	N/A
ii.	waste stabilization?	YES	NO	N/A
iii.	waste treatment?	YES	NO	N/A
iv.	waste disposal?	YES	NO	N/A
v.	placement of cover?	YES	NO	N/A
vi.	vegetation?	YES	NO	N/A
vii.	decontamination?	YES	NO	N/A
viii.	other (specify: _____)	YES	NO	

V. MAXIMUM INVENTORY

★ 1. Is there an estimate of the MAXIMUM INVENTORY of wastes in storage or treatment at any time during the life of the facility? (40 CFR 265.112(a)(2)) (YES) NO N/A

□ 2. Does the MAXIMUM INVENTORY estimate include the maximum amount of on-site wastes:

a.	requiring pre-treatment?	(YES)	NO	N/A
b.	requiring treatment?	(YES)	NO	N/A
c.	requiring disposal?	YES	(NO)	N/A

* see comm.

☐	3.	Does the MAXIMUM INVENTORY estimate include the maximum amount of on-site:			
☐	a.	wastes in surface impoundments?	YES	NO	(N/A)
☐	b.	wastes in partially-closed non-disposal surface impoundments?	YES	NO	(N/A)
☐	c.	wastes in tanks?	(YES)	NO	N/A
☐	d.	wastes in piles?	YES	NO	(N/A)
☐	e.	wastes in drainage pits?	YES	NO	(N/A)
☐	f.	wastes in containers?	(YES)	NO	N/A
☐	g.	standing liquids?	YES	NO	(N/A)
☐	h.	sludge?	YES	(NO)	N/A
☐	i.	contaminated soil from land treatment fields?	YES	NO	(N/A)
☐	j.	contaminated soil and liners from non-disposal impoundments?	YES	NO	(N/A)
☐	k.	contaminated soil from around tanks, containers, piles?	YES	(NO)	N/A
☐	l.	process residues?	(YES)	NO	N/A
☐	m.	decontamination residues?	YES	(NO)	N/A

- costs are given for off-site disposal but not amount of sludge

	4.	Does the plan discuss the type(s) of TESTING AND CRITERIA to be used to determine:			
	a.	whether soil is contaminated?	YES	NO	(N/A)
	b.	whether decontamination residues are hazardous?	YES	(NO)	N/A
	c.	whether process residues are hazardous?	YES	(NO)	N/A
	5.	Are INCOMPATIBLE WASTES identified and provisions described for keeping them separate during closure?	YES	NO	(N/A)

VI. FINAL CLOSURE

	1.	Does the plan clearly identify the STEPS TO CLOSE			
★	a.	at any point during the intended operating life? (40 CFR 265.112(a))	YES	(NO)	
★	b.	at the end of the intended operating life? (40 CFR 265.112(a))	(YES)	NO	

	2.	Do the STEPS TO CLOSE in the plan include:			
★	a.	removal of wastes? (40 CFR 265.113(a))	(YES)	NO	N/A
★	b.	treatment of wastes? (40 CFR 265.113(a))	(YES)	NO	N/A
★	c.	waste disposal? (40 CFR 265.113(a))	(YES)	NO	N/A
	d.	waste containment?	YES	(NO)	N/A
★	e.	cover? (40 CFR 265.310(b))	YES	NO	(N/A)
★	f.	decontamination of equipment and structures? (40 CFR 265.112(a)(3))	(YES)	NO	N/A
	g.	groundwater monitoring?	YES	NO	(N/A)
★	h.	closure certification? (40 CFR 265.115)	(YES)	NO	
	i.	maintenance of leachate program?	YES	NO	(N/A)
	j.	maintenance of gas collection program?	YES	NO	(N/A)
	k.	security requirements?	YES	(NO)	N/A
□	3.	With respect to the REMOVAL, TREATMENT, OR DISPOSAL of waste, does the plan identify:			
	a.	the source and type of materials and equipment needed?	(YES)	NO	
	b.	the amount of labor required?	(YES)	NO	
	c.	the capacity, number, and location of trenches or cells needed?	YES	NO	(N/A)
	d.	the area required for landspreading?	YES	NO	(N/A)
□	4.	Does the plan describe the CONTAINMENT of waste, including:			
★	a.	placement of final cover: (40 CFR 265.280(c)(2); 265.310(a))			
★		i. characteristics of cover? (40 CFR 265.280(c)(2)(ii); 265.310(a)(5))	YES	NO	(N/A)
★		ii. design of cover including final surface contours? (40 CFR 265.280(c)(2)(ii); 265.310(a)(5))	YES	NO	(N/A)
		iii. installation procedures?	YES	NO	(N/A)
★	b.	drainage and diversion structures? (40 CFR 265.280(c)(3),(4))	YES	(NO)	N/A

c. vegetation program:

★	i. characteristics of vegetation? (40 CFR 265.280(c)(2)(ii); 265.310(a)(5))	YES	NO	(N/A)
	ii. soil preparation?	YES	NO	(N/A)
★	d. erosion control: (40 CFR 265.310(b)(3))			
	i. type of materials?	YES	NO	(N/A)
	ii. amount of materials?	YES	NO	(N/A)
★	e. For landfills, does the closure plan address the following objectives and indicate how they will be achieved? (40 CFR 265.310(b))			
	(1) Control of pollution migration from the facility via ground water, surface water, and air.	YES	NO	(N/A)
	(2) Control of surface water infiltration, including prevention of pooling.	YES	NO	(N/A)
	(3) Prevention of erosion.	YES	NO	(N/A)
★	f. For land treatment operations, does the closure plan address the following objectives and indicate how they will be achieved? (40 CFR 265.280(a))			
	(1) Control of migration of hazardous wastes and constituents into ground water.	YES	NO	(N/A)
	(2) Control of the release of contaminated run-off into surface water.	YES	NO	(N/A)
	(3) Control of the release of airborne particulate contaminants caused by wind erosion.	YES	NO	(N/A)
	(4) Protection of food chain crops.	YES	NO	(N/A)

★ g. For landfills and land treatment operations, does the closure plan include at least a narrative statement indicating that the following factors were considered in addressing the closure objectives? (40 CFR 265.280(b), 310(b)):

(1) Type and amount of waste.	YES	NO	(N/A)
(2) Mobility and rate of migration.	YES	NO	(N/A)
(3) Site location, topography, and surrounding land use.	YES	NO	(N/A)
(4) Climate, including precipitation.	YES	NO	(N/A)
(5) Characteristics of the cover, including material, final surface contour, thickness, porosity, permeability, slope, vegetation.	YES	NO	(N/A)
(6) Geological and soil profiles and surface and subsurface hydrology.	YES	NO	(N/A)
(7) Unsaturated zone monitoring.	YES	NO	(N/A)
(8) Type, concentration, and depth of hazardous constituent migration as compared to background concentrations.	YES	NO	(N/A)

= ★ 5. Does the plan describe the DECONTAMINATION (40 CFR 265.112(a)(3); 265.114) of facility equipment and structures, including:

a. a list of equipment, containers, and structures requiring disposal or decontamination?	(YES)	NO	N/A
b. decontamination procedures?	(YES)	NO	N/A
c. method of treatment or disposal of residues?	(YES)	NO	N/A
d. testing program?	YES	(NO)	N/A

□ 6. With respect to MONITORING, does the closure plan describe:

a.	details of the groundwater monitoring program during closure?	YES	NO	N/A
b.	soil testing and monitoring ;	YES	NO	N/A
c.	maintenance of monitoring equipment during closure?	YES	NO	N/A
d.	other (specify: _____	YES	NO	

★ 7. With respect to CERTIFICATION of closure (40 CFR 265.115), does the closure plan describe scheduled or estimated number of inspections? YES (NO)

□ 8. If a system for COLLECTING LEACHATE is present, does the closure plan:

a.	describe leachate removal, treatment, and disposal during closure?	YES	NO	N/A
b.	identify the approximate volume of leachate collected?	YES	NO	N/A
c.	provide for maintenance of the leachate collection system during closure?	YES	NO	N/A

□ 9. If a GAS COLLECTION SYSTEM is required during operation, does the closure plan:

a.	describe procedures for collecting gas during closure?	YES	NO	N/A
b.	describe monitoring samples and analysis during closure?	YES	NO	N/A
c.	maintenance of gas collection system during closure?	YES	NO	N/A

□ 10. If SECURITY (i.e., fencing) is required, does the closure plan:

a.	describe the maintenance of security equipment during the closure period?	YES	NO	N/A
b.	describe the installation of appropriate equipment at closure?	YES	NO	N/A
c.	state the dimensions of the fence and the area to be enclosed?	YES	NO	N/A

VII. FINAL CLOSURE: SCHEDULE

★	1.	Does the plan identify the YEAR when final closure is expected to occur? (40 CFR 265.112(a)(4))	YES	(NO)	
		• What is the expected year of closure?	____	—	
★	2.	Is there a SCHEDULE for final closure activities? (40 CFR 265.112(a)(4))	YES	(NO)	
		IF "NO" SKIP TO COMMENTS SECTION.			
	3.	Does the SCHEDULE for final closure include:			
★		a. date closure is expected to begin? (40 CFR 265.112(a)(1))	YES	NO	
★		b. total time required to close? (40 CFR 265.112(a)(4))	YES	NO	
★		c. the time for intervening closure activities? (40 CFR 265.112(a)(4))	YES	NO	
		d. time required for key steps:			
★		i. waste inventory treatment? (40 CFR 265.112(a)(4))	YES	NO	N/A
★		ii. waste inventory disposal? (40 CFR 265.112(a)(4))	YES	NO	N/A
		iii. removal of waste inventory and residues?	YES	NO	N/A
		iv. decontamination of facility equipment and structures?	YES	NO	N/A
		v. install containment and diversion structures?	YES	NO	N/A
★		vi. placement of final cover? (40 CFR 265.112(a)(4))	YES	NO	N/A
		vii. planting vegetation?	YES	NO	N/A
		viii. closure certification?	YES	NO	
		ix. other (specify: _____ _____)	YES	NO	
	4.	Does the SCHEDULE for final closure:			
★		a. encompass more than 90 days for treatment, removal, or disposal of hazardous wastes after receipt of final volume of wastes? (40 CFR 265.113(a))	YES	NO	

★ b. encompass more than 180 days for completion of closure plan activities after receipt of final volume of wastes? (40 CFR 265.113(b)) YES • NO

VIII. COMMENTS

Section II (2): Several tanks as listed in the comments from page 2 of this checklist were not included in the closure plan; however, the comment note on page 2 may exempt some of these tanks from the closure regulations.

Section IV: The closure plan should include partial closure costs for replacement of tanks during the facility's active life; however, the tanks active period have not yet been determined or incorporated in the present plan.

Section V (2)(c): Closure cost estimate includes sludge removal; however, the max inventory does not include max amounts of sludge on-site. Max amounts of waste solvents and drums to be disposed of are included.

Section VII: Estimated man-hours for closure steps are given but no schedule has been set up for closure.

POST-CLOSURE PLAN CHECKLIST

I. WRITTEN PLAN

★	1. Is there a written POST-CLOSURE PLAN at the facility? (40 CFR 265.118(a)) If answer is "N/A" skip to cost estimate checklists.	YES	NO	N/A
	2. Does the post-closure plan cover the MAXIMUM AREA EXPECTED TO CONTAIN HAZARDOUS WASTE after closure, including:			
	a. landfills?	YES	NO	N/A
	b. disposal surface impoundments?	YES	NO	N/A
	c. land treatment facilities where hazardous waste will remain?	YES	NO	N/A
	d. other remaining hazardous wastes?	YES	NO	N/A
★	3. Does the post-closure plan provide for 30 years of post-closure care? (40 CFR 265.117(a))	YES	NO	
	• How many years of post-closure care? _____			
	4. Does the post-closure plan cover all areas where hazardous waste will remain that were active as of 11/19/80?	YES	NO	

II. SPECIFIC POST-CLOSURE PLAN REQUIREMENTS

★	1. Does the plan clearly identify the ACTIVITIES required in post-closure care? (40 CFR 265.118(a))	YES	NO	
★	2. Does the plan clearly identify the FREQUENCIES for post-closure activities? See also Question 5. (40 CFR 265.118(a))	YES	NO	
★	3. Do the GROUNDWATER MONITORING plans (40 CFR 265.117(a)(1); 265.118(a)(1)) include:			
	a. number of wells?	YES	NO	
	b. sample collection activities?	YES	NO	
	c. sample collection frequencies?	YES	NO	
	d. sample test activities?	YES	NO	
	e. sample test frequencies?	YES	NO	
	f. replacement of failed wells?	YES	NO	N/A

	4.	Is there a copy of the GROUNDWATER SAMPLING AND ANALYSIS PROGRAM attached to the plan?	YES	NO	
★	5.	Do the MAINTENANCE PLANS for waste containment structures (40 CFR 265.118(a)(2)) include:			
		a. inspection activities?	YES	NO	
		b. inspection frequencies?	YES	NO	
		c. maintaining final cover (erosion damage repair) activities?	YES	NO	
★		d. maintaining final cover (erosion damage repair) frequencies? (40 CFR 265.310(d)(1))	YES	NO	
		e. vegetation and fertilizing activities?	YES	NO	
★		f. vegetation and fertilizing frequencies? (40 CFR 265.118(a)(2)(i))	YES	NO	
		g. mowing activities?	YES	NO	
		h. mowing frequencies?	YES	NO	
★		i. collecting, removing, and treating leachate activities? (40 CFR 265.310(d)(2))	YES	NO	N/A
★		j. collecting, removing, and treating leachate frequencies? (40 CFR 265.310(d)(2))	YES	NO	N/A
★		k. gas collection activities? (40 CFR 265.310(d)(3))	YES	NO	N/A
★		l. gas collection frequencies? (40 CFR 265.310(d)(3))	YES	NO	N/A
		m. collection and treatment of runoff?	YES	NO	
		n. frequencies of runoff collection and treatment?	YES	NO	
★	6.	Do MONITORING EQUIPMENT MAINTENANCE plans (40 CFR 265.118(a)(2)(ii)) include:			
★		a. activities? (40 CFR 265.118(a)(2)(ii))	YES	NO	
★		b. frequencies? (40 CFR 265.118(a)(2)(ii))	YES	NO	
	7.	Do SECURITY REQUIREMENT plans include:			
		a. activities?	YES	NO	
		b. frequencies?	YES	NO	
★	8.	Does the plan identify the name, address and phone number of the POST-CLOSURE PERIOD CONTACT? (40 CFR 265.118(a)(3))	YES	NO	

★ 9. For landfills, does the post-closure plan address the following objectives and indicate how they will be achieved? (40 CFR 265.310(b))

(1) Control of pollution migration via ground water, surface water, and air.	YES	NO	N/A
(2) Control of surface water infiltration, including prevention of pooling.	YES	NO	N/A
(3) Prevention of erosion.	YES	NO	N/A

★ 10. For land treatment operations, does the post-closure plan address the following objectives and indicate how they will be achieved? (40 CFR 265.280(a))

(1) Control of migration of hazardous wastes and constituents into the ground water.	YES	NO	N/A
(2) Control of the release of contaminated runoff into surface water.	YES	NO	N/A
(3) Control of the release of airborne particulate contaminants caused by wind erosion.	YES	NO	N/A
(4) Protection of food chain crops.	YES	NO	N/A

★ 11. For landfills and land treatment operations, does the post-closure plan include at least a narrative statement indicating that the following factors were considered in addressing the closure objectives? (40 CFR 265.280(b), 310(b))

(1) Type and amount of waste.	YES	NO	N/A
(2) Mobility and rate of migration.	YES	NO	N/A
(3) Site location, topography, and surrounding land use.	YES	NO	N/A
- Climate, including precipitation.	YES	NO	N/A

(5)	Characteristics of the cover, including material, final surface contour, thickness, porosity, permeability, slope, vegetation.	YES	NO	N/A
(6)	Geological and soil profiles and surface and subsurface hydrology.	YES	NO	N/A
(7)	Unsaturated zone monitoring.	YES	NO	N/A
(8)	Type, concentration, and depth of hazardous constituent migration as compared to background concentrations.	YES	NO	N/A

III. OTHER REQUIREMENTS

★ 1.	Does the plan address the requirement for notice to the local land authority? (40 CFR 265.119)	YES	NO	
★ 2.	Does the plan address the requirement for notice in the deed? (40 CFR 265.120)	YES	NO	
3.	Does the plan address the protection and maintenance of surveyed benchmarks?	YES	NO	N/A

IV. COMMENTS

WORKSHEET 1A: FILL-IN QUANTITIES

HYPOTHETICAL MAXIMUM INVENTORY OF WASTES IN PLAN

Type of Waste	Grand Total (indicate units)	Hydrofluoric acid/ Heavy Metal Waste Facility Type #1* (Specify) Total (indicate units)	Industrial Waste Treatment Facility Type #2* (Specify) Total (indicate units)	Waste Solvent Storage Facility Type #3 (Specify) Total (indicate units)
1. Maximum amount of undisposed waste requiring pre-treatment		358,486 gals	579,650 gals	N/A
2. Maximum amount of waste resulting from pre-treatment				
3. Maximum amount of undisposed waste requiring treatment				
4. Maximum amount of waste resulting from treatment		~18 tons (sludge)	218 tons (sludge)	
5. Maximum amount of undisposed waste in storage prior to disposal				
-- in tanks				110,900 gals
-- in surface impoundments				
-- in waste piles				
-- in drainage pits				
-- in containers				
-- standing liquids (not included in the estimates above)				
- sludge (not included in the estimates above)		~18 tons	~18 tons	
- liners				
-- leachate				
-- other (specify: _____)				
6. Maximum amount of contaminated soil		N/A	N/A	N/A
-- in land treatment fields				
-- in non-disposal surface impoundments				
- around tanks				
-- around containers				
-- around treatment facilities				
-- from facility decontamination (list only if not included in estimates above)				
7. Maximum amount of residues		N/A	N/A	?
-- from treatment/disposal processes				
-- from facility decontamination				
GRAND TOTAL				

* Use these columns to distinguish among different waste management operations. For example certain types of wastes may be stored in containers prior to incineration; other types may be stored in containers prior to being landfilled. To be sure that the closure plan has accounted for all containers, the columns may be used to collect subtotals. Where the plan omitted to count some category of the maximum inventory, please circle the line where the entry should go. Avoid double-counting.

WORKSHEET 1A: FILL-IN QUANTITIES (Continued)

HYPOTHETICAL MAXIMUM INVENTORY OF WASTES IN PLAN

Type of Waste	Grand Total (indicate units)	Facility Type #1* (Specify) Total (indicate units)	Facility Type #2* (Specify) Total (indicate units)	Facility Type #3 (Specify) Total (indicate units)
		Drum Storage	Waste oil storage	
1. Maximum amount of undisposed waste requiring pre-treatment		N/A	?	
2. Maximum amount of waste resulting from pre-treatment				
3. Maximum amount of undisposed waste requiring treatment				
4. Maximum amount of waste resulting from treatment				
5. Maximum amount of undisposed waste in storage prior to disposal				
-- in tanks			gals	
-- in surface impoundments				
-- in waste piles				
-- in drainage pits				
-- in containers		100,000 gals		
-- standing liquids (not included in the estimates above)				
- sludge (not included in the estimates above)				
- liners				
-- leachate				
-- other (specify: _____)				
6. Maximum amount of contaminated soil		N/A	N/A	
-- in land treatment fields				
-- in non-disposal surface impoundments				
- around tanks				
-- around containers				
-- around treatment facilities				
-- from facility decontamination (list only if not included in estimates above)				
7. Maximum amount of residues		N/A	?	
-- from treatment/disposal processes				
-- from facility decontamination				
GRAND TOTAL				

* Use these columns to distinguish among different waste management operations. For example certain types of wastes may be stored in containers prior to incineration; other types may be stored in containers prior to being landfilled. To be sure that the closure plan has accounted for all containers, the columns may be used to collect subtotals. Where the plan omitted to count some category of the maximum inventory, please circle the line where the entry should go. Avoid double-counting.

WORKSHEET 18

CLOSURE PLAN DESCRIPTION OF METHOD OF TREATMENT OR DISPOSAL OF MAXIMUM INVENTORY OF WASTES: CHECKLIST

Type of Waste	On-Site			Off-Site			
	Pre-Treatment Method Described?	Treatment Method Described?	Disposal Method Described?	Removal Method Described?	Treatment Method Identified?	Disposal Method Identified?	TSDF Identified?
1. Waste in storage							
-- in tanks	✓	✓		✓		✓	✓
-- in surface impoundments							
-- in waste piles							
-- in drainage pits							
-- in containers				✓		✓	✓
-- standing liquids (not included in estimates above)							
-- sludge (not included in estimates above)				NG		NG	✓
- liner							
-- leachate							
-- other (specify: _____)							
2. Contaminated soil							
-- in land treatment fields							
-- in non-disposal surface impoundments							
-- around tanks							
-- around containers				NG		NG	NG
-- around treatment facilities							
- from facility decontamination (list only if not included in estimates above)							
3. [illegible]							
from treatment/disposal processes				NG		NG	✓
from facility decontamination				NG		NG	✓

* lines were left blank where not applicable.

NG = information is not given.

WORKSHEET 3C: FILL-IN QUANTITIES

PLAN FOR REMOVAL, TREATMENT, OR DISPOSAL OF MAXIMUM WASTE INVENTORY

Type of Waste	GRAND TOTAL (Specify) (indicate units)				FROM FACILITY TYPE #1* (Specify) (indicate units)				FROM FACILITY TYPE #2* (Specify) (indicate units)			
	On-Site		Off-Site		On-Site		Off-Site		On Site		Off Site	
	Treatment	Disposal	Treatment	Disposal	Treatment	Disposal	Treatment	Disposal	Treatment	Disposal	Treatment	Disposal
1. Maximum amount of undisposed waste requiring pre-treatment												
2. Maximum amount of waste resulting from pre-treatment												
3. Maximum amount of undisposed waste requiring treatment												
4. Maximum amount of waste resulting from treatment												
5. Maximum amount of undisposed waste in storage prior to disposal												
in tanks												
in surface impoundments												
in waste piles												
in drums or pits												
in containers												
in other liquids (not included in the estimates above)												
in bulk (not included in the estimates above)												
liners												
in bunkers												
other (specify:)												

WORKSHEET 1C: FILL IN QUANTITIES

PLAN FOR REMOVAL, TREATMENT, OR DISPOSAL OF MAXIMUM WASTE INVENTORY

Type of Waste	GRAND TOTAL (Specify) (indicate units)				FROM FACILITY TYPE #1* (Specify) (indicate units)				FROM FACILITY TYPE #2* (Specify) (indicate units)			
	On-Site		Off Site		On-Site		Off-Site		On-Site		Off-Site	
	Treatment	Disposal	Treatment	Disposal	Treatment	Disposal	Treatment	Disposal	Treatment	Disposal	Treatment	Disposal
6. Maximum amount of contaminated soil												
-- in land treatment fields												
-- in non-disposal surface impoundments												
-- around tanks												
-- around containers												
-- around treatment facilities												
-- from facility decontamination (list only if not included in estimates above)												
7. Maximum amount of residues												
-- from treatment/disposal processes												
-- from facility decontamination												
GRAND TOTAL												

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GENERAL COST ESTIMATE CHECKLIST

A. Closure Cost Estimate

★ 1. Is there a written closure cost estimate? (40 CFR 265.142(a)) — (YES) NO

2. What is the amount of the closure cost estimate? — $ 715,260

3. Is there documentation supporting the cost estimate? — (YES) NO

   a. Work-ups? — YES (NO)
   b. Contractor bids? — YES (NO)
   c. Operating history? — (YES) NO
   d. Other _____ — YES NO

★ 4. Has the cost estimate been adjusted by the 9% inflation factor? (40 CFR 265.142(b)) — (YES) NO N/A

5. Does the cost estimate cover all the activities in the closure plan including costs of labor? — (YES) NO

★ 6. Does the closure cost estimate cover all required closure activities? (40 CFR 265.142(a)) If "NO" specify in comments below. — (YES) NO

Comments: _____

B. Post-Closure Cost Estimate

★	1. Is there a written post-closure cost estimate? (40 CFR 265.144(a))	YES	NO	(N/A)
	2. What is the amount of the estimate?	$ _____		
	3. Is there documentation supporting the post-closure cost estimate?	YES	NO	
	a. Work-ups?	YES	NO	
	b. Contractor bids?	YES	NO	
	c. Operating history?	YES	NO	
	d. Other _____	YES	NO	
★	4. Is the annual estimate multiplied by 30 to cover to entire post-closure care period? (40 CFR 265.144(b))	YES	NO	
★	5. Has the cost estimate been adjusted by the 9% inflation factor? (40 CFR 265.144(b))	YES	NO	N/A
★	6. Does the cost estimate cover all the activities in the post-closure plan (40 CFR 265.118)?	YES	NO	
	Including labor costs?	YES	NO	
★	As well as the requirements of notice to local land authorities and in deeds? (40 CFR 265.119, 265.120)	YES	NO	
★	7. Does the post-closure cost estimate cover all required post-closure activities? - (40 CFR 265.144(a)) If "NO" specify in comments below.	YES	NO	

Comments: _____

_____

_____

_____

_____

_____

CLOSURE COST ESTIMATE VERIFICATION

Does Not Apply	Applies	
	In-cluded	Not In-cluded
	✓	
	✓	

(40 CFR 265.112(a)(2))

★

1. TREATING, DISPOSING OR REMOVING INVENTORY

A. On Site

a. Amount of inventory and residues* to be disposed on site (yd^3)
   i. From cost estimate — 191,586 gal
   ii. From closure plan
☐ iii. From visual inspection

b. Unit cost for on site treatment or disposal ($/$yd^3$)
   i. From cost estimate

c. Total cost of on site treatment or disposal ($)
   i. From cost estimate — $35,700

	✓	

B. Off Site

a. Amount of inventory and residues to be disposed off site (yd^3)
   i. From cost estimate — see comments
   ii. From closure plan — –
☐ iii. From visual inspection — –

b. Unit cost for off site treatment or disposal ($/$yd^3$)
   i. From cost estimate — –

c. Total cost for off-site disposal excluding transportation
   i. From cost estimate — –

*Residues here refer to residues existing at initiation of closure.

Does Not Apply	Applies	
	Included	Not Included

d. Unit cost for transport of inventory ($/yd³/mile)
   i. From cost estimate —

e. Transport distance (miles)
   i. From cost estimate —
   ii. By map reference —

f. Cost of transport ($)
   i. From cost estimate —

g. Cost of off site treatment or disposal including transport ($)
   i. From cost estimate $ 313,200
   ii. Inspector calculation

	✓	

C. Total Cost of Treating, Disposing or Removing Inventory ($)

   a. From cost estimate $ 348,900

	✓	
✓		

2. DECONTAMINATION

(40 CFR 265.280(c)(1))

A. Soil Excavation

   a. Volume of soil to be removed (yd³)
      i. From cost estimate
      ii. From closure plan
      ☐ iii. Inspector's estimate

   b. Unit cost for soil excavation ($/yd³)
      i. From cost estimate

   c. Total cost of contaminated soil excavation ($)
      i. From cost estimate

Does Not Apply	Applies	
	Included	Not Included
✓		

B. Wastewater Removal

a. Volume of wastewater to be removed (yd^3)
   i. From cost estimate _____
   ii. From closure plan _____
☐ iii. Inspector's estimate _____

b. Unit cost for wastewater removal ($/$yd^3$)
   i. From cost estimate _____

c. Total cost of wastewater removal ($)
   i. From cost estimate _____

		✓

C. On Site Treatment or Disposal of Contaminated Soil, Wastewater and Residues Generated During Decontamination

a. Volume of soil, wastewater and residues to be treated/disposed on site (yd^3)
   i. From cost estimate _____
   ii. From closure plan _____
☐ iii. Inspector's estimate _____

b. Unit cost for treatment/disposal ($/$yd^3$)
   i. From cost estimate _____

c. Cost of on site treatment/disposal ($)
   i. From cost estimate _____

		✓

D. Off Site Treatment or Disposal of Contaminated Soil, Wastewater and Residues Generated During Decontamination

a. Volume of soil, wastewater and residues to be treated/disposed off site (yd^3)
   i. From cost estimate _____
   ii. From closure plan _____
☐ iii. From visual inspection _____

Does Not Apply	Applies	
	Included	Not Included

b. Unit cost for off site treatment/ disposal ($/yd³)
   i. From cost estimate _____

c. Cost of off site treatment/disposal ($) excluding transportation
   i. From cost estimate _____

d. Unit cost for transport ($/yd³/mile)
   i. From cost estimate _____

e. Transport distance (miles)
   i. From cost estimate _____
   ii. By map reference _____

f. Cost of transport ($)
   i. From cost estimate _____

g. Total cost of off site treatment or disposal including transport ($)
   i. From cost estimate _____

	✓	

(40 CFR 265.112(a)(3))

★

E. Equipment Decontamination

a. Amount of equipment to be decontaminated (tons)
   i. From cost estimate _____
   ii. From closure plan _____
☐ iii. Inspector's estimate _____

b. Unit cost for equipment decontamination ($/ton)
   i. From cost estimate _____

c. Cost of equipment decontamination ($)
   i. From cost estimate $ 224,400

	✓	

F. Total Cost of Decontamination ($)

a. From cost estimate $ 224,400

Does Not Apply	Applies: Included	Applies: Not Included
		✓

(40 CFR 265.115) ★

3. CERTIFICATION

A. Professional Engineer Hours (hrs)

a. From cost estimate _____
b. From closure plan _____
☐ c. Inspector's estimate _____

B. Unit Cost for Professional Engineer* ($/hr.)

a. From cost estimate _____

	✓	

C. Total Certification Cost ($) (≈ 5% of total closure cost)

a. From cost estimate $ 27,300

✓		
✓		

(40 CFR 265.112(a)(4); 265.280(c)(2)) ★

4. COVER

A. Cover Material**

a. Area to be covered (yd^2)
i. From cost estimate _____
ii. From closure plan _____
☐ iii. From visual inspection _____

b. Depth of cover material (yd)
i. From cost estimate _____
ii. From closure plan _____
☐ iii. Inspector's estimate _____

*Loaded with costs for support personnel.

**Includes materials to be used for cover, for example gravel or clay, except for top-soil.

Does Not Apply	Applies	
	Included	Not Included

c. Volume of material to be obtained on site (yd^3)
   i. From cost estimate _____
   ii. From closure plan _____
☐ iii. Inspector's estimate _____

d. Volume of material to be obtained off site (yd^3)
   i. From cost estimate _____
   ii. From closure plan _____
☐ iii. Inspector's estimate _____

e. Unit cost of excavating material on site ($/$yd^3$)
   i. From cost estimate _____

f. Unit cost of purchasing material off site ($/$yd^3$)
   i. From cost estimate _____

g. Unit cost of transporting material ($/$yd^3$/mile)
   i. From cost estimate _____

h. Transport distance (miles)
   i. From cost estimate _____
   ii. By map reference _____

i. Transport cost ($)
   i. From cost estimate _____

j. Total cost of acquiring material ($)
   i. From cost estimate _____

k. Unit cost of spreading and compacting material ($/$yd^3$)
   i. From cost estimate _____

l. Cost of spreading and compacting material ($)
   i. From cost estimate _____

m. Total cost of acquiring and placing material ($)
   i. From cost estimate _____

Does Not Apply	Applies: Included	Applies: Not Included
✓		

B. Top-soil

a. Area to be covered (yd^2)
   i. From cost estimate _____
   ii. From closure plan _____
□ iii. From visual inspection _____

b. Depth of top-soil, allowing for appropriate grading (yd)
   i. From cost estimate _____
   ii. From closure plan _____
□ iii. Inspector's estimate _____

c. Volume of top-soil to be obtained on site (yd^3)
   i. From cost estimate _____
   ii. From closure plan _____
□ iii. Inspector's estimate _____

d. Volume of top-soil to be obtained off site (yd^3)
   i. From cost estimate _____
   ii. From closure plan _____
□ iii. Inspector's estimate _____

e. Unit cost of excavating top-soil on site ($/$yd^3$)
   i. From cost estimate _____

f. Unit cost of purchasing top-soil off site ($/$yd^3$)
   i. From cost estimate _____

g. Unit cost of transporting top-soil ($/$yd^3$/mile)
   i. From cost estimate _____

h. Transport distance (miles)
   i. From cost estimate _____
   ii. By map reference _____

Does Not Apply	Applies	
	Included	Not Included

i. Transport cost ($)
   i. From cost estimate _____

j. Total cost of acquiring top-soil ($)
   i. From cost estimate _____

k. Unit cost of spreading and compacting top-soil ($/yd³)
   i. From cost estimate _____

l. Cost of spreading and compacting top-soil ($)
   i. From cost estimate _____

m. Total cost of acquiring and placing top-soil ($)
   i. From cost estimate _____

✓		

C. Synthetic Liner and Buffer Material

a. Area to be covered (yd²)
   i. From cost estimate _____
   ii. From closure plan _____
☐ iii. From visual inspection _____

b. Depth of sand* buffer (yd)
   i. From cost estimate _____
   ii. From closure plan _____
☐ iii. Inspector's estimate _____

c. Volume of sand to be obtained on site (yd³)
   i. From cost estimate _____
   ii. From closure plan _____
☐ iii. Inspector's estimate _____

*Includes other materials (other than clay and top-soil) which may be used along with the synthetic liner.

Does Not Apply	Applies	
	Included	Not Included

d. Volume of sand to be obtained off site (yd^3)
   i. From cost estimate _____
   ii. From closure plan _____
□ iii. Inspector's estimate _____

e. Unit cost of excavating sand on site ($/$yd^3$)
   i. From cost estimate _____

f. Unit cost of purchasing sand off site ($/$yd^3$)
   i. From cost estimate _____

g. Unit cost of transporting sand ($/$yd^3$/mile)
   i. From cost estimate _____

h. Transport distance (miles)
   i. From cost estimate _____
   ii. By map reference _____

j. Total cost of acquiring sand ($)
   i. From cost estimate _____

k. Unit cost of spreading and compacting sand ($/$yd^3$)
   i. From cost estimate _____

l. Cost of spreading and compacting sand ($)
   i. From cost estimate _____

m. Total cost of acquiring and placing sand ($)
   i. From cost estimate _____

n. Unit cost of acquiring and installing synthetic liner ($/$yd^2$)
   i. From cost estimate _____

o. Cost of acquiring and installing synthetic liner ($)
   i. From cost estimate _____

p. Unit cost of acquiring and installing synthetic liner and buffer materials ($/$yd^2$)
   i. From cost estimate _____

Does Not Apply	Applies	
	Included	Not Included

q. Total cost of acquiring and installing synthetic liner and buffer materials ($)
   i. From cost estimate _____

✓		

D. Total Cover Cost

a. Unit cost of cover ($/yd²)
   i. From cost estimate _____

b. Total cost of cover ($)
   i. From cost estimate _____

✓		

5. Vegetation

(40 CFR 265.280(c)(2)(ii))

A. Area in Need of Vegetation (yd²)
   a. From cost estimate _____
   b. From closure plan _____
   ☐ c. From visual inspection _____

B. Unit Cost for Acquiring and Placing Seed, Fertilizer, Etc. ($/yd²)
   a. From cost estimate _____

C. Total cost of Acquiring and Placing Seed, Fertilizer, Etc. ($)
   a. From cost estimate _____

	✓	

6. Other (from cost estimate) ($) _____

Contingency (20%) (specify) $ 114,660

_____ (specify) $ _____

7. Total Closure Costs ($) _____

A. From cost estimate $ 715,260

COMMENTS

Closure cost estimate: Off-site disposal costs is for removal of 1000 (50gal) drums, contaminated pipes, sludge removal, solvent removal (liquid). A breakdown of which wastewaters are treated on-site from the Floride/Heavy metal treatment system and industrial treatment system should be made to corelate the maximum inventory list with the closure cost list. The volumes of liquids in the inventory list far exceed those shown in the cost estimates. Note: if the wastewaters are treated on-site, the applicable tanks would be exempt from the regulations of 265 and the total closure cost would be lower than the cost estimated in the plan.

On-site disposal is for transport of material from tanks by tanker trucks to the Floride/Heavy metal treatment system.

Decontamination is for sandblasting costs to remove tank residues where applicable, and manhour costs for flushing tanks and pipes.

From inspection of purchase orders the inspector estimates are as follows:

① Sludge removal from Floride + Industrial treatment systems, one load of ~20tons from each system = $1125 (Floride sludge) + $2062 (industrial sludge) = $3187 including transport.

② Max Drum Storage from visual inspection (1200 drums x $50/drum) = $60,000 + transport (~15 loads of ~80 drums/load) = $20625

③ Solvent removal for max inventory estimate of 110,900gals

110,900gals x $760/6000gals = $14,047 + 5% tax ($702)

= $14,749

④ Waste Oil removal for max inventory of 4500gals

4500gals x $760/6000gals (min. charge) = $760 + $38 = $798

COMMENTS

Closure Costs Cont. :

(5) On-site trucking of Sludge (Heavy metals waste (from plan)	$ 35,700
(6) Man-hours (from plan) - includes sand blasting cost + rinsing	$ 224,400
(7) Disposal of piping (from plan)	$ 47,400
(8) Removal of Meters / Sludge acid (from plan)	$ 6600
(a) Engineer	$ 27,300
Total	$ 440,759
Contingency (from plan)	$ 114,660
Grand Total	$ 555,419

* Cost of decontamination of containment structures should be added to the above total.

Note : Costs would be much less if the waste treatment systems are exempt under 265.1 (c)(10).

POST-CLOSURE COST ESTIMATE VERIFICATION

Does Not Apply	Applies	
	Included	Not Included
✓		

1. INSPECTION/FACILITY VISITS

A. Total hours of professional level personnel (hrs/year)
   a. From cost estimate _____
   b. From post-closure plan _____
☐ c. Inspector's estimate _____

B. Unit cost for professional level personnel*($/hr)
   a. From cost estimate _____

C. Total inspection/facility visit cost ($/year)
   a. From cost estimate _____

2. REESTABLISHING FINAL COVER AND VEGETATION

(40 CFR 265.118(a)(2)(i); 265.310(d)(1))

A. Area involved (yd^2)
   a. From cost estimate _____
   b. From post-closure plan _____
☐ c. From visual inspection _____

★

B. Unit cost for reestablishing cover and vegetation ($/$yd^2$)
   a. From cost estimate _____

C. Reestablishing cover and vegetation cost ($/year)
   a. From cost estimate _____

*Loaded with costs for support personnel.

Does Not Apply	Applies	
	Included	Not Included

3. FERTILIZING

A. Area involved (yd^2)
   a. From cost estimate _____
   b. From post-closure plan _____
☐ c. From visual inspection _____

B. Unit cost for fertilizing ($/$yd^2$)
   a. From cost estimate _____

C. Total fertilizing cost ($/year)
   a. From cost estimate _____

4. MOWING

A. Area involved (yd^2)
   a. From cost estimate _____
   b. From post-closure plan _____
☐ c. From visual inspection _____

B. Unit cost for mowing ($/$yd^2$)
   a. From cost estimate _____

C. Mowing cost ($/year)
   a. From cost estimate _____

5. GROUNDWATER MONITORING AND WELL REPLACEMENT

(40 CFR 265.117(a)(1))

A. Groundwater Monitoring

   a. Number of wells
      i. From cost estimate _____
      ii. From post-closure plan _____
☐   iii. From visual inspection _____

Does Not Apply	Applies	
	Included	Not Included

b. Unit cost for groundwater monitoring ($/well/year)
   i. From cost estimate _____

c. Groundwater monitoring cost ($/year)
   i. From cost estimate _____

B. Well Replacement

a. Average annual number of well replacements
   i. From cost estimate _____
   ii. From post-closure plan _____
☐ iii. Inspector's estimate _____

b. Unit cost for well replacement ($/replacement)
   i. From cost estimate _____

c. Cost for well replacement ($/year)
   i. From cost estimate _____

C. Total groundwater monitoring and well replacement cost ($/year)*
   a. From cost estimate _____

6. MAINTAINING AND REPLACING FENCES

(40 CFR 265.117(b); 265.14(b)(2)(i))

A. Maintaining Fences

a. Length of fence required (yd)
   i. From cost estimate _____
   ii. From post-closure plan _____
☐ iii. From visual inspection _____

*Note in comment section whether well replacement component is on annual basis or not.

Does Not Apply	Applies	
	Included	Not Included

b. Unit cost for maintaining fences ($/yd)
   i. From cost estimate _____

c. Cost for maintaining fences ($/year)
   i. From cost estimate _____

B. Replacing Fences

a. Length of fence to be replaced annually* (yd)
   i. From cost estimate _____
   ii. From post-closure plan _____
□ iii. Inspector's estimate _____

b. Unit cost for fence replacement ($/yd)
   i. From cost estimate _____

c. Cost of fence replacement ($/year)
   i. From cost estimate _____

C. Total Maintaining and Replacing Fences Cost ($/year)**

a. From cost estimate _____

7. COLLECTING, REMOVING AND TREATING LEACHATE

A. Amount of leachate collected (gal./year)

a. From cost estimate _____
b. From post-closure plan _____

(40 CFR 265.310(d)(2))

★

*Total length of fence to be replaced over the entire post-closure period divided by 30 to obtain an annual average.

**Note in comment section whether fence replacement component is on annual basis or not.

Does Not Apply	Applies	
	Included	Not Included

B. Off Site Disposal

a. Amount of leachate removed to off site disposal facility (gal./year)
   i. From cost estimate _____
   ii. From post-closure plan _____

b. Unit cost for off site leachate disposal ($/gal.)
   i. From cost estimate _____

c. Unit cost for transport of leachate ($/gal./mile)
   i. From cost estimate _____

d. Transport distance (miles)
   i. From cost estimate _____
   ii. From post-closure plan _____
   iii. By map reference _____

e. Cost of transport ($/year)
   i. From cost estimate _____

f. Total cost of off-site treatment/ disposal of leachate ($/year)
   i. From cost estimate _____

C. On Site Disposal

a. Amount of leachate disposed of on-site (gal.)
   i. From cost estimate _____
   ii. From post-closure plan _____

b. Unit cost of on site leachate disposal ($/gal.)
   i. From cost estimate _____

c. Cost of on-site leachate disposal ($/year)
   i. From cost estimate _____

Does Not Apply	Applies: Included	Applies: Not Included

D. Total Collecting, Removing, Treating and Disposal of Leachate Cost ($)
   a. From cost estimate _____

8. Administrative

A. Hours of management time required to administer the post-closure plan (hrs/year)
   a. From cost estimate _____
   b. From post-closure plan _____
   c. Inspector's estimate _____

B. Unit cost for management time* ($/hr)
   a. From cost estimate _____

C. Total administrative cost ($/year)
   a. From cost estimate _____

9. Other (specify) ($/year) _____

(40 CFR 265.119) ★
(40 CFR 265.120) ★

A. Local land authority notice ($/year) _____
B. Notice in deed ($/year) _____
C. _____ _____
D. _____ _____
E. _____ _____
(Total Other) _____

10. Total Annual Post-Closure Costs ($) _____

a. From cost estimate _____

*Loaded with costs for support personnel.

COMMENTS

RCRA INSPECTION FORM

Report Prepared for:

Generator ☑

Transporter ☐

HWM (TSD) facility ☑

Copy of report sent to the facility ☐

Facility Information

Name: IBM - East Fishkill

Address: Route 52
Hopewell Junction, NY.
12533

EPA ID#: NYD 000707901

Date of Inspection: Oct. 19, 1982

Participating Personnel

State or EPA Personnel: Andrew Bellina - EPA

Facility Personnel: William Carey - Env. Eng
Kam Gumpta - Env. Coor.

Report Prepared by Name: Andrew Bellina

Agency: EPA

Telephone #: 212-264-0548

Approved for the Director by: [signature]

GENERATOR INSPECTION CHECKLIST

	YES	NO	N/A
40 CFR 262 Subpart A-General			
262.11 - Hazardous waste determination			
1) Did the generator test its waste to determine whether it is hazardous?	✓		
Is the waste hazardous?	✓		
2) Is the generator determining that its waste exhibits a hazardous waste characteristic(s) based on its knowledge of the material(s) or processes used?	✓		
40 CFR 262 Subpart B-The Manifest			
Has hazardous waste been shipped off-site since November 19, 1980?	✓		
If yes, approximately how many shipments, off-site, have been made and describe the approximate size of an average shipment made on a monthly basis. If facility is a small quantity generator, please explain. ~100			
262.21 Does each manifest (or representative sample) have the following information? Please circle the missing elements.			
— a manifest document number?	✓		
— the generators name, mailing address, telephone number and EPA I.D. Number?	✓		
— the transporters name and EPA I.D. Number?			
— the name, address and EPA ID Number of the designated facility?	✓		
— a description of the wastes (DOT)?	✓		
— the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle?	✓		
— a certification that the materials are properly classified, described, package, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?	✓		
(obtain a copy of the incomplete manifests)			
40 CFR 262 - Subpart D - Recordkeeping and Reporting			
262.40 Has the generator maintained facility records since Nov. 19, 1980? (manifest, exception report and waste analysis)	✓		
262.42 Has the generator received signed copies (from the TSD facility) of all the manifests for waste shipped off-site more than 35 days ago?	✓		
If not, have Exception Reports been submitted to EPA covering any of these shipments made more than 45 days ago?			✓

YES NO N/A

40 CFR 262 - Subpart C - Pretransportation Requirements

262.30-33 Before transporting or offering hazardous waste for transportation off-site does the generator:

1) Package the waste in accordance with applicable DOT regulations (i.e., 49 CFR Parts 173, 178 & 179) ✓ _ _

2) Label each package according to DOT (i.e., 49 CFR 172) ✓ _ _

3) Mark each package according to DOT (i.e., 49 CFR 172) ✓ _ _

4) Mark each container of 110 gallons or less with the words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. EPA," and include the generators name, address and manifest document number. (i.e., 49 CFR 172.304) ✓ _ _

262.34 Accumulation Time

1) How is waste accumulated on-site?

- ☑ Containers
- ☑ Tanks
- ☐ Surface impoundments (complete HWMF checklist)
- ☐ Piles (complete HWMF checklist)

2) Is waste accumulated for more than 90 days? ✓ _ _

If yes, complete HWMF checklist

3) Is each container clearly dated with each period of accumulation so as to be visible for inspection? _ _ ✓

4) Is each container or tank marked or labeled with the words "hazardous waste" or in compliance with the DOT labeling requirements? ✓ _ _

STOP HERE IF THE HAZARDOUS WASTE MGT FACILITY (TSD) CHECKLIST IS FILLED OUT

HAZARDOUS [illegible]E MANAGEMENT FACILITY CHECK LIST
(Facilities Subject to 40 CFR 265 Standards)

	YES	NO	N/A

40 CFR Part 265 Subpart B General Facility Standards

265.13-General Waste Analysis

1) Is there a detailed chemical and physical anaylsis of a representative sample of the waste or each waste? (At a minimum this analysis must contain all the information necessary for proper management of the waste) — ✓

2) Does the character of the waste handled at the facility change from day to day, week to week, etc., thus requiring frequent testing?
You may check only one

Waste characteristics vary ____
All waste are basically the same ✓
Company treats all waste as hazardous ____

3) Is there a written waste analysis plan at the facility? — ✓

Does it contain the following:

a) Parameters for each waste to be analyzed and the rationale for the selection of these parameters. — ✓

b) Test methods used to test these parameters. — ✓

c) Sampling methods to obtain a representative sample of the waste to be analyzed. — ✓

d) Frequency of repeated analysis to ensure accurate and current information. — ✓

4) Does hazardous waste come to this facility from an outside source? e.g. another generator. — ✓

5) If waste comes from an outside source, are there procedures in the plan to insure that waste received conforms to the accompanying manifest? — N/A

265.14-Security

1) Is there: a) a 24-hour surveillance system? or, — ✓

b) a suitable barrier which completely surrounds the active portion of this facility? — ✓

2) Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility? — ✓

If no, explain what measures are taken for security.
treatment plant building was under repair contractor stated signs would be reposted upon completion

265.15 - General Inspections Requirements

1) Does the facility have a written inspection schedule? — ✓

2) Does the schedule identify the types of problems to be looked for and the frequency of inspections? — ✓

3) Does the owner/operator record inspections in a log? — ✓

4) Is there evidence that problems reported in the inspection log have been remedied? — ✓

If no, please explain.

265.16 - Personnel Training	YES	NO	N/A
1) Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed?	✓		
If yes, have facility personnel taken part in an annual review of training?	✓		
2) Is there written documentation of the following:			
—job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?	✓		
—type and amount of training to be given to personnel in jobs related to hazardous waste management?	✓		
—actual training or experience received by personnel?	✓		
3) Are training records kept on all employees for at least 3 years?	✓		

265.17-General Requirements for Ignitable, Reactive or Incompatible Wastes

1) Are there ignitable, reactive or incompatible wastes on site?	✓		
If yes, what are the approximate types and quantities and location of the waste. ~200,000 gal-Ignitable ~ 50,000 gal-Reactive			
2) Have precautions been taken to prevent accidental ignition or reaction of ignitable or reactive waste?	✓		
If no, please explain.			
3) In your opinion, are proper precautions taken so that these wastes do not:			
— generate extreme heat or pressure, fire or explosion, or violent reaction?	✓		
— produce uncontrolled toxic mist, fumes, dusts or gases in sufficient quantities to pose a risk of fire or explosions?	✓		
— damage the structural integrity of the device or facility containing the waste?	✓		
— threaten human health or the environment?	✓		

40 CFR 265 - Subpart C - Preparedness and Prevention

	YES	NO	N/A
265.32 Does the facility comply with preparedness and prevention requirements including maintaining:			
— an internal communications or alarm system?	✓		
— a telephone or other device to summon emergency assistance from local authorities?	✓		
— portable fire equipment?	✓		
— water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.	✓		
265.33 Is equipment tested and maintained?	✓		
265.34 Is there immediate access to communications or alarm systems during handling of hazardous waste?	✓		
265.35 Adequate aisle space?		✓	

If no, please explain storage pattern.
storage drums were being readied for shipment and were grouped without aisle space.

In your opinion, do the types of waste on-site require all of the above procedures, or are some not needed: Explain.
all needed

40 CFR 265 - Subpart D - Contingency Plan and Emergency Procedures

	YES	NO	N/A
Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions or any unplanned release of hazardous waste?	✓		
1) Does the plan describe arrangements made with the local authorities?	✓		
2) Has the contingency plan been submitted to the local authorities?	✓		
3) Does the plan list names, addresses and phone numbers of Emergency Coordinators?	✓		
4) Does the plan have a list of what emergency equipment is available?	✓		
5) Is there a provision for evacuating facility personnel?	✓		
6) Was there an emergency coordinator present or on call at the time of the inspection?	✓		

40 CFR 265 Subpart E-Manifest System, Recordkeeping and Reporting

265.71 - Use of the Manifest

	YES	NO	N/A
1) Has the facility received hazardous waste from an off-site source since November 19, 1980?			✓
If no, skip to 265.73 - Operating Record			
2) If yes, does it appear that the facility has a copy of a manifest for each hazardous waste load received?			
If not, please explain.			

YES NO N/A

3) How many post-November 19 manifests does the facility have? (Estimate if the number is large)

4) Does each manifest have the following information? (circle missing information)

— a manifest document number?

— the generators name, mailing address, telephone number and EPA I.D. #?

— the transporters name and EPA I.D. Number?

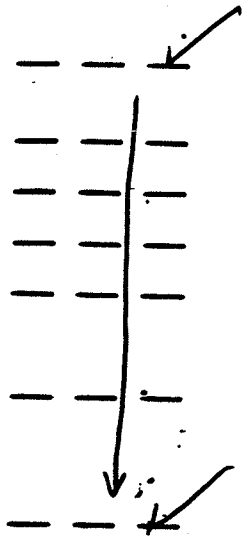
— the TSD name, address, telephone number & EPA I.D. Number?

— a description of the waste (DOT)?

— the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle?

— a certification that the materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?

(Obtain a copy of the incomplete manifests)



265.72 - Manifest Discrepancies

Have there been significant discrepancies between the quantity and type of waste received and the waste identified on the manifest?

Describe unreconciled descrepancies.

265.73 - Operating Record

1) Does the facility keep an operating record?

2) Does the record contain the following information:

a) Description and quantity of waste on-site and the method(s) and date(s) of its Treatments, Storage & Disposal?

b) The location and quantity of each hazardous waste at each location?

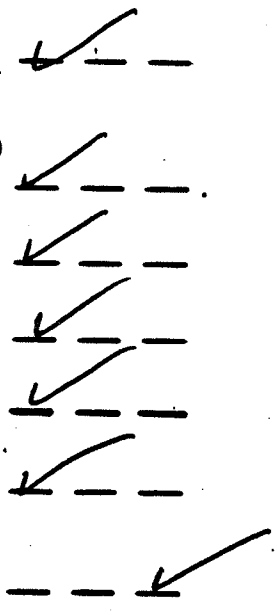
c) Records and results of waste analysis and trial tests performed and identified in the waste analysis plan?

d) Summary reports and details of all incidents that require implementing the contingency plan.

e) Records and results of inspections for the past 3 years or November 19, 1980 which ever is less?

f) Monitoring, testing or analytical data where required for:

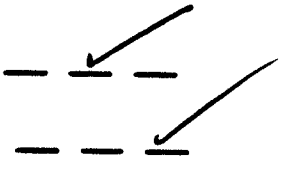
Groundwater, Land Treatment, Incinerators, and Thermal Treatment?



265.76 - Unmanifested Waste Report

Has the facility accepted hazardous waste from off-site sources without a manifest?

If yes, has the facility submitted an unmanifested waste report?



40 CFR 265 Subpart F - Groundwater Monitoring	YES	NO	N/A
(Applies only to surface impoundments, landfills and/or land treatment facilities.)			
Is a groundwater monitoring plan available at the facility?			✓
If yes, please fill out the appropriate Groundwater Monitoring Questionaire and attach to this report.			

40 CFR 265 Subpart G - Closure and Post-Closure

265.111 Closure Performance Standard

Have any portions of the facility been closed since November 19, 1980?		✓	
If yes, please explain			

265.112 - Closure Plan

Does the facility have a written closure plan? (Applies to all types of TSD facilities)	✓		
If yes, does the written plan include:			
1. A description of how and when the facility will be partially (if applicable) and ultimately closed?	✓		
2. An estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility?	✓		
3. A description of the steps necessary to decontaminate facility equipment during closure?	✓		
4. A schedule for final closure including the anticipated date when waste will no longer be received and when final closure will be completed?	✓		
5. Does the owner/operator have a written estimate of of the cost of closing the facility?	✓		
If yes, what is it? ($) 750,000			

265.118 - Post Closure Plan

Does the facility have a written post-closure plan? (Applies only to disposal facilities)			✓
If yes, Does the Plan:			
1. Identify the activities which will be carried on after closure and the frequency of these activities?			
2. Include a description of planned groundwater monitoring activities and their frequency during post-closure?			
3. Include a description of planned maintenance activities and frequency to insure integrity of final cover during post-closure?			
4. Include the name, address and phone number of a person or office to contact during post-closure?			
5. Does the owner/operator have a written estimate of the cost of post-closure for the facility?			
If yes, what is it? ($)			

Please circle all appropriate activities and answer questions on indicated pages for all activities circled.

Storage	Treatment	Disposal
Container - pg 6	Tank - pg 7	Landfill - pg 11
Tank, above ground-pg 7	Surface Impoundment-pg 8	Land Treatment - pg 10
Tank, below ground-pg 7	Incineration - pg 12	Surface Impoundments - pg 8
Surface Impoundments-pg 8	Thermal Treatment- pg 12	Other_____
Waste Piles - pg 9	Land Treatment - pg 10	
Other_____	Chemical, Physical and Biological Treatment - pg 13	
	Other_____	

	YES	NO	N/A
40 CFR 265 - Subpart I - Containers			
1) - What type of containers are used for storage. Describe the size, type, quantity and nature of waste (e.g. 12 fifty-five gallon drums of waste acetone) ~300 55 gal drums - various solvents, oxidizers, HM, & caustics waste.			
2) - Is there a containment system for spills, leaks and precipitation?	✓		
If yes, describe.			
265.171 - Do the containers appear to be in good condition, not in danger of leaking?	✓		
If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.			
265.172 - Are hazardous waste stored in containers made of compatible materials?	✓		
If not, please explain.			
265.173(a) - Are all containers closed except those in use?	✓		
265.173(b) - Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?	✓		
265.174 - Is the storage area inspected at least weekly?	✓		
265.176 - Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?	✓		
265.177 - Are incompatible wastes stored separate from each other?	✓		
If no, explain			

40 CFR 265 Subpart J - Tanks	YES	NO	N/A
265.190 1) What are the approximate number and size of tanks containing hazardous waste? 50 tanks			
2) Identify the waste treated/stored in each tank. solvents, oxidizers, HM, & caustics			
265.192 - General Operating Requirements			
1) Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?	✓		
If no, please explain.			
2) Are there leaking tanks?		✓	
3) Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?	✓		
4) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?	✓		
5) If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank? e.g. bypass system to a standby tank	✓		
265.194 - Inspections			
1) Is the tank(s) inspected each operating day for a) discharge control equipment	✓		
b) monitoring equipment	✓		
c) level of waste in tank	✓		
2) Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?	✓		
3) Are there underground tanks?	✓		
If yes, how many and can they be entered for inspection? 38	✓		
265.198 - Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?	✓		
If no, please explain.			
265.199 - Does it appear that incompatible wastes are being stored separate from each other?	✓		

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION II

PERMIT

Permittee IBM Corporation
East Fishkill Route 52
Hopewell Junction, New York 12533

I. D. Number NYD000707901
Effective Date: December 31, 1983
Termination Date: December 31, 1993

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 USC §6901 et seq., commonly known as RCRA) and regulations promulgated thereunder by the U.S. Environmental Protection Agency (EPA) (codified and to be codified in Title 40 of the Code of Federal Regulations), a permit is issued to IBM Corporation (hereafter called the Permittee), to operate a hazardous waste storage facility located in Hopewell Junction, New York on Route 52.

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 40 CFR Parts 260 through 264 and 270 and 124 as specified in the permit. Applicable regulations are those which are in effect on the date of issuance of this permit. (See 40 CFR §270.32(c)).

This permit is based on the assumption that the information submitted in the permit application attached to the Permittee's letter dated October 1, 1982 as modified by subsequent amendments dated December 1, 1982, January 4, 1983, January 28, 1983 and July 22, 1983 (hereafter referred to as the application) is accurate and that the facility will be constructed and operated as specified in the application. Any inaccuracies found in this information may be grounds for the termination or modification of this permit (40 CFR §270.41, §270.42 and §270.43) and potential enforcement action. The Permittee must inform EPA of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit is effective as of December 31, 1983 in accordance with 40 CFR §270.41, and shall remain in effect until December 31, 1993 in accordance with 40 CFR §270.50, unless revoked and reissued, or terminated (40 CFR §270.41 and §270.43) or continued in accordance with §270.51.

Issued by the U.S. Environmental Protection Agency - Region II

Jacqueline E. Schafer
Regional Administrator
U.S. Environmental Protection Agency
Region II

December 13, 1983
Date

MODULE I - STANDARD CONDITIONS

A. EFFECT OF PERMIT

The Permittee is allowed to treat, store, or dispose of hazardous waste in accordance with the conditions of this permit. Any storage, treatment, or disposal of hazardous waste not authorized in this permit is prohibited unless authorized by a special form of a RCRA permit as specified in 40 CFR 270, Subpart F or exempt from RCRA permit requirements as allowed under 40 CFR §264.1. Compliance with this permit constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local laws or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 of RCRA, Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9606 (a), commonly known as CERCLA), or any other law providing for protection of public health or the environment.

B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR §270.41, §270.42 and §270.43. The filing of a request for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.

C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

D. DUTIES AND REQUIREMENTS

1. Duty to Comply. The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit [see §270.61]. Any permit noncompliance, except under the terms of an emergency permit, constitutes a violation of RCRA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal.

2. Duty to Reapply. If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee shall submit a complete application for a new permit at least 180 days before this permit expires.

3. Permit Expiration. As set forth in 40 CFR §270.51, this permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 40 CFR §270, Subpart B) and through no fault of the Permittee the Regional Administrator has not issued a new permit.

4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

5. Duty to Mitigate. The Permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.

6. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate sampling, laboratory and process controls, including appropriate quality assurance/quality control procedures. This provision requires the operation of back up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of the permit.

7. Duty to Provide Information. The Permittee shall furnish to the Regional Administrator, within a reasonable time, any relevant information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.

8. Inspection and Entry. The Permittee shall allow the Regional Administrator, or an authorized representative, upon the presensention of credentials and other documents as may be required by law to:

(a) Enter at reasonable times upon the Permittee's premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records, that must be kept under the conditions of this permit;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

(d) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by RCRA, any substances or parameters at any location.

9. Monitoring and Records.

(a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity and shall be conducted in accordance with the waste analysis plan set forth in Module II, Condition C.

(b) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least three years from the date of the sample, measurement, report or record. These periods may be extended by request of the Regional Administrator at any time.

(c) Records of monitoring information shall specify:

(i) The dates, exact place, and times of sampling or measurements;

(ii) The individuals who performed the sampling or measurements;

(iii) The dates analyses were performed;

(iv) The individual(s) who performed the analyses;

(v) The sampling techniques or methods used;

(vi) The analytical techniques or methods used; and

(vii) The results of such analyses.

10. Reporting Planned Changes. The Permittee shall give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions to the permitted facility.

11. Certification of Construction or Modification. The Permittee may not commence treatment, storage or disposal of hazardous waste at a newly constructed facility nor in a modified portion of an existing facility until:

(a) The Permittee has submitted to the Regional Administrator by certified mail or hand delivery, a letter signed by the Permittee and a registered professional engineer, stating that the facility has been constructed or modified in compliance with the permit; and

(b) (i) The Regional Administrator inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or

(ii) The Regional Administrator has either waived the inspection or has not within 15 days notified the Permittee of his or her intent to inspect.

[Note: This condition only applies to newly constructed facilities or to permitted facilities which have been modified.]

12. Anticipated Noncompliance. The Permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

13. Transfer of Permits. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to 40 CFR §270.41(b)(2) or §270.42(d). Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270.

14. Compliance Schedule. The Permittee shall complete the construction of the sludge dumpster storage area located outside building 385 by September 1, 1984. The area shall be constructed and operated in accordance with permit attachments I-IX. By September 14, 1984, certification by a qualified engineer stating that construction of the dumpster storage area has been completed in accordance with this permit must be submitted.

Prior to the certification's submittal, the Permittee shall not store hazardous waste in the dumpster area more than 90 days.

15. Twenty-four Hour Reporting. The Permittee shall report to the Regional Administrator any noncompliance with the permit which may endanger human health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:

(a) Information concerning the release of any hazardous waste which may cause endangerment to public drinking water supplies.

(b) Any information of a release or discharge of hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health.

(c) The description of the occurrence and its cause, as reported in Module I, Condition D.15(a) or (b) shall include:

(i) Name, address, and telephone number of the owner or operator;

(ii) Name, address, and telephone number of the facility;

(iii) Date, time, and type of incident;

(iv) Name and quantity of materials involved;

(v) The extent of injuries, if any;

(vi) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and

(vii) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided within five days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee need not comply with the five day written notice requirement if the Regional Administrator waives the requirement and the Permittee submits a written report within 15 days of the time the Permittee becomes aware of the circumstances.

The oral reports required above, may be made by contacting the EPA Region II 24-hour Emergency Response Center at 201/548-8730, or any designated telephone number which may subsequently replace it.

16. Unmanifested Waste Report. A report must be submitted to the Regional Administrator within 15 days of receipt of unmanifested waste and include the information listed in 40 CFR §264.76.

17. Manifest Discrepancy Report. If a significant discrepancy (as defined by 40 CFR §264.72(a)) in a manifest is discovered, the Permittee must attempt to reconcile the discrepancy. If not resolved within 15 days, the Permittee must submit a letter report to the Regional Administrator. The report must include a copy of the manifest and must meet the information requirements of 40 CFR §264.72.

18. Additional Noncompliance Reporting. The Permittee shall report all instances of noncompliance (including release of hazardous waste, fire, or explosion) not required to be reported under Module I, Condition D.15. Such noncompliance shall be reported for each calendar quarter (i.e., January through March and each subsequent quarter) by no later than 30 days after the end of the quarter. The reports shall contain the information listed in Module I, Condition D.15(c)(i-vii).

19. Other Information. Whenever the Permittee becomes aware that he failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application, or in any report to the Regional Administrator, the Permittee shall promptly submit such facts or information.

E. Signatory Requirement. All reports or other information requested by the Regional Administrator shall be signed and certified as required by 40 CFR §270.11(b).

F. Confidential Information. The Permittee may claim confidential any information required to be submitted by this permit in accordance with 40 CFR §270.12 and 40 CFR Part 2.

G. Documents To Be Maintained At The Facility. In addition to a copy of this permit and any amendments, revisions or modifications to the permit and its attachments, the following information must be recorded, as it becomes available, and maintained in the operating record until closure of the facility, except as noted.

(1) A description and quantity of each hazardous waste received, and method(s) and date(s) of its treatment, storage, or disposal at the facility as required by 40 CFR §264, Appendix I.

(2) The location of each hazardous waste within the facility and the quantity at each location. For all facilities, this information must include cross references to specific manifest document numbers, if waste was accompanied by a manifest.

(3) Records and results of waste analyses performed as specified in §264.13, §264.17 and §264.341.

(4) Summary reports and details of all incidents that require implementation of the contingency plan as specified in §264.56(j).

(5) Records and results of inspections as required by §264.15(d) (this data need be kept only three years).

(6) Notices to generators as specified in §264.12(b) [for off-site facilities].

(7) All closure cost estimates under §264.142 and for disposal facilities, all post closure cost estimates under §264.144.

(8) Training records on current personnel must be kept until closure of the facility; training records on former employees must be kept for at least three years from the date the employee last worked at the facility as specified in 40 CFR §264.16(e).

(9) A copy of each manifest and shipping paper (if signed in lieu of the manifest at the time of delivery) (manifests need only be kept for three years from date of delivery).

H. Major/Minor Modifications. The permit may be modified for cause as allowed under 40 CFR §270.41 and §270.42. Major modifications shall be requested in writing as required by §124.5 and show cause as required by §270.41. Minor modifications as listed in 40 CFR §270.42 shall be submitted to the Regional Administrator for approval and permit modification. The information to be submitted for minor modifications must be received by certified mail a minimum of 15 business days prior to the proposed day of modification.

I. All Reports and Submittals. All reports and submittals required by this permit are to be submitted to the Regional Administrator and sent to the following address.

Regional Administrator
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

Attn: Permits Administration Branch
(Room 432)

A copy of each report and submittal should also be sent to:

New York State Department of Environmental Conservation
50 Wolf Road
Albany, New York 12233-0001

Attn: Bureau of Hazardous Waste Technology
Division of Solid and Hazardous Waste

MODULE II - GENERAL FACILITY CONDITIONS

A. Design and Operation of Facility. The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

The Permittee is authorized to treat or store, only the hazardous wastes identified in Insert IIA (following page).

B. Required Notice.

(1) The Permittee shall notify the Regional Administrator in writing at least four weeks in advance of the date the Permittee expects to receive hazardous waste from a foreign source. Notice of subsequent shipments of the same waste from the same foreign source in the same calendar year is not required.

(2) When the Permittee is to receive hazardous waste from an off-site source he must inform the generator in writing that he has the appropriate permits for, and will accept the waste the generator is shipping. The Permittee shall keep a copy of this written notice as part of the operating record. (See Module II, Condition L.1).

C. General Waste Analysis. The Permittee shall follow the procedures described in the waste analysis plan, Attachment I.

The Permittee shall verify its waste analyses as part of the quality assurance program. The quality assurance program will be in accordance with current EPA practices (Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846, Second Edition, 1982) or equivalent methods approved by the Regional Administrator, and at a minimum, ensure that the Permittee maintains proper functional instruments, uses approved sampling and analytical methods, as specified in 40 CFR §261, Appendixs I, II and III, assures the validity of sampling and analytical procedures and performs correct calculations.

D. Security. The Permittee shall comply with the security provisions of 40 CFR §264.14(b) and (c) in accordance with Attachment II.

INSERT IIA

Waste Number	Waste Description
P016	Bis (choloromethyl) ether
F005	Carbon disulfide
P120	Vandadium pentoxide
U001	Acetaldehyde
U004	Acetophenone
U009	Acrylonitrile
U023	Benzotrichloride
U043	Chloroethene
U045	Chloromethane
F004	Cresols
U056	Cyclohexane
U134	Hydrofluoric acid
U147	Maleic anhydride
U190	Phthalic anhydride
F005	Pyridine
U197	p-Benzoquinone
U210	Tetrachloromethane
U213	Tetrahydrofuran
F004	Nitrobenzene
P098	Potassium cyanide
P030	Cyanides
U019	Benzene
D001	Spent activated carbon
D009	Mercury
U070	1,2-Dichlorobenzene
U144	Lead acetate
U122	Formaldehyde
F005	Methyl ethyl ketone
U188	Phenol
U211	Tetrachloromethane
U210	Tetrachloroethane
F005	Toluene
U228	Trichloroethene
F005	Molybdenum paste
U123	Formic acid
P106	Sodium cyanide
D001,F005	Isobutyl alcohol
D002	Corrosive Waste
D002	J-100 Photoresist stripper

Waste Number	Waste Description
F001	Spent halogenated solvents: tetrachloroethylene,trichlor(ethylene,methylene chloride, 1,1,1-trichloroethane,carbon tetrachloride,chlorinated fluorocarbons
F007	Spent cyanide plating bath solutions
F009	Spent stripping and cleaning bath solutions from cyanide electroplating operartions
D002	Acetic acid
D002, D009	Boiler soot
D003	Reactive waste(cyanide)
D008	Lead
D006	Cadmium
D004	Arsenic
D001	Isopropyl alcohol
D001	Ethyl cellosolve
D001	Cellosolve acetate
F006	Wastewater treatment sludge from electroplating operations
D002	Iodine/Potassium iodide
D001	Waste ignitable solvents
F003	Spent non-halogenated solvents xylene,acetone,ethyl acetate,ethly benzene,ethyl ether, methyl isobutyl ketone n-butyl alcohol,cyclohexanone methanol
F002	Spent halogenated solvents: chlorobenzene,1,1,2-trichloro-1,2,2-trifluoroethane, ortho-dichlorobenzene,trichlorofluoromethane tetrachloroethylene, trichloroethylene Methylene chloride, 1,1,1-trichloroethane

E. General Inspection Requirements. The Permittee shall follow the inspection schedule, Attachment III. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 40 CFR §264.15(c). Records of inspections shall be kept as required by 40 CFR §264.15(d).

F. Personnel Training. The Permittee shall conduct personnel training as required by 40 CFR §264.16(a), (b) and (c). This training program shall follow the attached outline, Attachment IV. The Permittee shall maintain training documents and records as required by 40 CFR §264.16(d) and (e).

G. General Requirements for Ignitable, Reactive, or Incompatible Waste. The Permittee shall take precautions to prevent accidental ignition or reaction of ignitable or reactive waste as required by 40 CFR §264.17 and Attachment V.

H. Preparedness and Prevention

1. Required Equipment. At a minimum, the Permittee shall equip the facility with the equipment set forth in the contingency plan, Attachment VI as required by 40 CFR §264.32.

2. Testing and Maintenance of Equipment. The Permittee shall test and maintain the equipment specified in the previous permit condition as necessary to assure its proper operation in time of emergency, as set forth in the Inspection Schedule (Attachment VI).

3. Access to Communications or Alarm System. The Permittee shall maintain access to the communications or alarm system as required by 40 CFR §264.34, in accordance with Attachment VI.

4. Required Aisle Space. At a minimum, the Permittee shall, in accordance with Attachment VI, maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility in an emergency as required by 40 CFR §264.35, and to provide access for inspections as required by §264.174.

5. Arrangements with Local Authorities. The Permittee shall attempt to make arrangements with State and local authorities as required by 40 CFR §264.37. If State or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

I. Contingency Plan.

1. Implementation of Plan. The Permittee shall immediately carry out the provisions of the contingency plan, Attachment VI, and follow the emergency procedures described by 40 CFR §264.56 whenever there is a fire, explosion, or release of hazardous waste or constituents which threatens or could threaten human health or the environment.

2. After any event requiring implementation of the contingency plan, the Permittee shall not resume hazardous waste management until all equipment used during the contingency has been cleaned, recharged or replaced, as appropriate.

3. Copies of Plan. The Permittee shall comply with the requirements of 40 CFR §264.53.

4. Amendments to Plan. The Permittee shall review and immediately amend, if necessary, the contingency plan, as required by 40 CFR §264.54.

[Note: Amendments to the plan are subject to the permit modification requirements of 40 CFR Part 270.]

5. Emergency Coordinator. The Permittee shall comply with the requirements of 40 CFR §264.55, concerning the emergency coordinator.

J. Manifest System. The Permittee shall comply with the manifest requirements of 40 CFR §264.71, §264.72, and §264.76.

K. Recordkeeping and Reporting.

1. Operating Record. The Permittee shall maintain a written operating record at the facility in accordance with 40 CFR §264.73, as appropriate.

2. Availability, Retention, and Disposition of Records. All records, including plans, must be made available to EPA in accordance with 40 CFR §264.74(a). Retention period for all records is extended automatically during any unresolved enforcement action regarding the facility or as requested by the Regional Administrator. A copy of records of waste disposal locations and quantities under §264.73(b)(2) must be submitted to the Regional Administrator and local land authority upon closure of the facility as required by §264.74(c).

3. Biennial Report. The Permittee shall comply with the biennial report requirements of 40 CFR §264.75.

L. Closure.

1. Performance Standard. The Permittee shall close the facility as required by 40 CFR §264.111 and in accordance with the closure plan, Attachment VII.

2. Amendment to Closure Plan. The Permittee shall amend the closure plan whenever necessary in accordance with 40 CFR §264.112(b).

[Note: Amendments to the closure plan are subject to the permit modification requirements of 40 CFR Part 270.]

3. Notification of Closure. The Permittee shall notify the Regional Administrator at least 180 days prior to the date he expects to begin closure.

4. Time Allowed for Closure. After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste and shall complete closure activities in accordance with the schedule specified in the closure plan, Attachment VII.

5. Disposal or Decontamination of Equipment. The Permittee shall decontaminate [and/or] dispose of all facility equipment as required by 40 CFR §264.114 and as outlined in the closure plan, Attachment VII.

6. Certification of Closure. When closure is completed, the Permittee shall submit to the Regional Administrator, certification by the Permittee and by an independent professional engineer that the facility has been closed in accordance with the specification in the closure plan as required by 40 CFR §264.115.

M. Cost Estimate for Facility Closure. The Permittee's original closure cost estimate, prepared in accordance with 40 CFR §264.142(a), is specified in Attachment VII.

1. The Permittee must adjust the closure cost estimate for inflation within 30 days after each anniversary of the date on which the first closure cost estimate was prepared, as required by 40 CFR §264.142(b).

[Note: The annual inflation adjustment of the closure cost estimate is not subject to the permit modification requirements of 40 CFR Part 270.]

2. The Permittee must revise the closure cost estimate whenever there is a change in the facility's closure plan as required by 40 CFR §264.142(c).

[Note: The above revision is subject to the permit modification requirements of 40 CFR Part 270.]

3. The Permittee must keep at the facility the latest closure cost estimate as required by 40 CFR §264.142(d).

N. Financial Assurance for Facility Closure. The Permittee shall demonstrate continuous compliance with 40 CFR §264.143 or when applicable with 40 CFR §264.145, §264.146, §264.149 and §264.150 by providing documentation of financial assurance, as required by 40 CFR §264.151, in at least the amount of the cost estimates required by Module II, Condition M. (Attachment VIII). Changes in financial assurance mechanisms must be approved by the Regional Administrator pursuant to 40 CFR §264.143.

O. Liability Requirements. The Permittee shall demonstrate continuous compliance with the requirements of 40 CFR §264.147 and the documentation requirements of 40 CFR §264.151, including requirements to have and maintain liability coverage for sudden and accidental occurrences in the amount of at least $1 million per occurrence with an annual aggregate of at least $2 million, exclusive of legal defense costs. (Attachment VIII).

P. Incapacity of Owners or Operators, Guarantors, or Financial Institutions.

The Permittee shall comply with 40 CFR §264.148 whenever necessary.

MODULE III - STORAGE IN CONTAINERS

A. Authorized Storage Area, Waste Types and Storage Volume.
Only the three container storage areas (main and cyanide/incompatible storage rooms, builing 309 and sludge dumpster at building 385) described in Attachment IX are authorized by this permit.

Main Storage Room (building 309) - the volume of waste stored in containers shall not exceed 55,000 gallons at any given time. Additionally, the volume of waste in containers storing free liquids (as defined under 40 CFR §261.10) shall not exceed 46,275 gallons at any given time.

The placement of waste in containers shall be in accordance with Attachment IX and shall be limited to the wastes listed in Part II.A of this permit with the exception of the wastes listed below for the cyanide/incompatible storage room.

Cyanide/Incompatible Storage Room (building 309) - the volume of waste stored in containers shall not exeed 8,250 gallons at any given time. Only the following wastes shall be stored in the cyanide/incompatible storage room:

P005	Allyl alcohol
U031	n-Butyl alcohol
U140	Iso-butyl alcohol
D001	Isopropyl alcohol
U154	Methyl alcohol
U001	Acetaldehyde
U122	Formaldehyde
U196	Pyridine
P022	Carbon disulfide
P030	Cyanides
P098	Potassium cyanide
P106	Sodium cyanide
F007	Spent cyanide plating bath solution
F009	Spent stripping and cleaning bath solutions from cyanide electroplating operations

Sludge Dumpster Area - The volume of waste stored in containers shall not exceed 25 cubic yards per container. There shall be a maximum of one container inside building 385 and three containers in the sludge dumpster storage area located outside building 385. Construction of this area shall be completed by September 1984. See permit Condition I.D(14).

The hazardous waste stored in the dumpsters shall be limited to wastewater treatment sludge from electroplating operations as defined by Hazardous Waste Code F006.

B. Containment. The Permittee shall construct and maintain the containment system in accordance with the requirements of 40 CFR §264.175 as specified in the attached plans and specifications, Attachment IX.

C. Condition of Containers. If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this permit. Each such occurrence shall be reported as specified in Module I, Condition D.17.

D. Compatibility of Waste with Containers. The Permittee shall assure that the ability of the container to contain the waste is not impaired as required by 40 CFR §264.172, and in accordance with Attachment IX.

E. Management of Containers. The Permittee shall manage containers as required by 40 CFR §264.173.

F. Special Requirements for Ignitable or Reactive Waste. The Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line.

G. Special Requirements for Incompatible Waste.

1. The Permittee shall not place incompatible wastes or incompatible wastes and materials in the same container (Attachment V).

2. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material.

3. The Permittee shall separate containers of incompatible wastes as indicated in the attached plans, Attachment IV, as required by 40 CFR §264.177(c).

MODULE IV - STORAGE/TREATMENT IN TANKS

A. Waste Identification. The Permittee may store or treat the following hazardous wastes in tanks, subject to the terms of this permit:

Authorized Wastes. Only the following wastes shall be managed in tanks:

Tank	Waste Description	Waste Number
134	Methylene chloride	F002
135	n-Butyl acetate	D001
136	1,1,2-trichloro-1,2,2-trifluoroethane	F001
137	Perchloroethylene	F001
138	Isopropyl alcohol	D001

Minimum Shell Thickness. The minimum shell thickness specified below for each tank shall be maintained at all times.

Tank	Minimum Shell Thickness
134	.3125"
135	.3125"
136	.3125"
137	.3125"
138	.3125"

B. Design of Authorized Tanks. The Permittee shall construct and maintain all tanks as required by 40 CFR §264.191, as specified in the attached plans and specifications, Attachment X. The Permittee shall maintain the minimum shell thickness specified in Module IV, Condition A. at all times to ensure sufficient shell strength.

C. General Operating Requirements.

1. The Permittee shall protect tanks from accelerated corrosion, erosion or abrasion as required by 40 CFR §264.192(a), as specified in Attachment X.

[Note: This condition only applies if wastes or other materials incompatible with the tank are introduced.]

(2) The Permittee shall prevent overfilling of tanks, as required by 40 CFR §264.192(b), by the methods specified in Attachment X.

D. Special Requirements for Ignitable or Reactive Wastes.

1. The Permittee shall not place ignitable or reactive waste in a tank unless the procedures described in Attachment X are followed, as required by 40 CFR §264.198(a).

2. The Permittee shall document compliance with Module IV, Condition D.1 as required by 40 CFR §264.17(c) and place this documentation in the operating record (Module II, Condition M.1.).

3. The Permittee shall maintain buffer zones around covered tanks as specified in Attachment X, as required by 40 CFR §264.198(b).

E. Special Requirements for Incompatible Wastes.

1. The Permittee shall not place incompatible wastes in the same tank or place hazardous waste in a tank that previously held an incompatible waste or material unless the procedures specified in Attachment X are followed, as required by 40 CFR §264.17(b).

2. The Permittee shall document compliance with Module IV, Condition E.1. as required by 40 CFR §264.17(c) and place this documentation in the operating record (Module II, Condition M.1.).

F. Comprehensive Inspection Schedule. The Permittee shall perform comprehensive inspections of the tanks used to manage hazardous waste, as described in 40 CFR §264.194(b) with the following frequency:

Once every two years for the first 14 years, providing that the corrosion rate does not exceed 2.3 percent in any two year period.

Annually thereafter.

ATTACHMENT I

IBM
East Fishkill, New York
EPA I.D. NO. NYD000707901

HAZARDOUS WASTE ANALYSIS PLAN

HAZARDOUS WASTE TREATMENT FACILITIES

The hazardous waste treatment facilities at East Fishkill are comprised of the Fluoride/Heavy Metals Treatment Plant and the Industrial Waste Treatment/ Neutralization Plant. The tank treatment processes involved in both treatment facilities meet the definition of wastewater treatment units described in 40 CFR §260.10 and as such are exempt from regulation by RCRA permit under 40 CFR §264.1(g)(6).

HAZARDOUS WASTE STORAGE AREAS
GENERAL SECTION

The hazardous waste storage facility is composed of five bulk storage tanks and three container storage areas. The bulk storage tanks receive organic wastes from some of the various on-site electronic part production processes. The incompatible wastes are segregated in DOT approved drums. All these wastes are disposed off-site through licensed vendors. The wastes contained in the storage areas are sampled and analyzed by methods described in Test Methods for the Evaluation of Solid Wastes (SW846) and in Federal Register, May 19, 1980, Page 33127-33133. Representative samples are collected in accordance with the appropriate EPA approved sampling method. These samples are brought to the laboratory and analyzed either in-house or by consultant laboratories. All known wastes generated on a daily basis in this plan may be sampled and analyzed before shipment off-site or at least annually or when there is reason to believe that the waste characteristics have varied.

Analysis for the hazardous waste characteristics of ignitability, corrosivity, reactivity and EP toxicity are to be carried out as described in Part 261 of May 19, 1980, Federal Register for all unknown wastes. Unknown waste will not be placed in any storage area until tested.

Waste solvents will be analyzed for parameters listed in Appendix I. These parameters were chosen based on our historical analytical results and are used to determine if the waste characteristics have varied. Most solvents are characterized under ignitability and the flash point test will verify that characteristic. The analyses are performed using Gas Chromatograph to identify organic solvents. The other parameters provide information requested by our disposal vendors or are useful for shipping the wastes.

Appendix II lists parameters that will be analyzed for bulk wastes generated daily. These parameters were also chosen based on our historical analytical results. Hazardous waste characteristics that have values or check marks next to the bulk waste's name will be analyzed for the listed parameter. For example, water carbon waste particles (see page 5) will be analyzed for EP toxicity; specifically lead, because past testing has shown that the only characteristic displayed by the water carbon is EP toxicity and that lead is the only heavy metal of concern. All analytical results are kept by the Environmental Laboratory, RCRA Coordinator and the Storage Facility (Department 67D, and/or Department 855) for a minimum of three years.

In addition, the East Fishkill site receives small amounts of hazardous waste from two satellite facilities:

The IBM facility located in the Merritt-Brooklands Industrial Park, Route 9, Fishkill, NY (EPA Number NYD000707893).

The IBM facility located in the Investor's Funding Corporation Industrial Park, All Angels Hill Road, Wappingers Falls, NY (EPA Number NYD000824490)

The Merritt-Brooklands facility generates the same wastes from the same manufacturing processes as the main plant. The hazardous wastes include hydrofluoric acid and solvent wastes.

The Investor's Funding Corporation facility is a quality assurance laboratory and generates the same type of waste as the main plant's laboratory (acids and solvents). Wastes are shipped to the main plant on an infrequent basis.

Only known wastes are transported from the two satellite facilities to the main plant. All shipments are manifested and once delivered to the main plant, are reanalyzed in accordance with the test methods described in this plan. Once the manifest is verified, the waste is placed in the appropriate storage area.

BULK WASTE TANKS

The bulk waste stored in tanks are listed in Appendix III and will be sampled prior to each shipment and later analyzed. Methylene chloride, and perchloroethylene wastes are listed as toxic. These wastes will be monitored for pH to insure that they remain compatible with its container. 1,1,2-trichloro-1,2,2-trifluoro-ethane and Isopropyl alcohol wastes are ignitable and will be analyzed for its flash point to determine if the waste's characteristics have varied.

CONTAINERIZED WASTE

Appendix IV, Part A lists the hazardous wastes that are generated on a daily basis and stored in containers. Prior to shipment off-site, or at least annually, a representative sample of each waste type (for example, a sample will be taken from one of the containers storing solvent waste and analyzed for the parameters listed in Appendix I). Analysis will be performed utilizing the test methods specified in the General section of this plan on page 2.

Appendix IV; part B lists hazardous wastes that at one time or another may be discarded from laboratory operations. The wastes generated from laboratory activities on-site and from the laboratory located in the Investor's Funding Plaza are labeled by chemical name by laboratory personnel who have worked with and have knowledge of the waste. Therefore, these wastes, since they are analyzed prior to storage, do not require any additional analysis prior to shipment off-site and analysis will be done only on an annual basis, except for waste generated by the Investor's Funding Plaza facility, which will be reanalyzed prior to storage.

Wastes that are not listed in Appendix IV will be handled as unknowns and tested as described in the General section of this plan. Materials such as spill clean-up wastes or packaged laboratory chemicals will be placed in drums and the identity of each chemical will be labeled on the drums. No waste will be placed in the storage areas prior to its identification.

APPENDIX I

SOLVENT WASTE ANALYTICAL PARAMETERS

GENERAL	COMPOSITION
Ash Content	Acetone
BTU Value	N-Butyl acetate
Scrub Value	Cellosolve acetate
Flash Point	Chlorobenzene
Total Chlorine	Dichlorobenzene
Specific Gravity	Ethyl benzene
Corrosivity - pH	Ethyl cellosolve
	1,1,2-trichloro-1,2,2-trifluoroethane
	Isopropyl alcohol
	Methyl alcohol
	Methylene chloride
	N-Methyl pyrollidinone
	Tetrachloroethylene
	Phenol
	Toluene
	1, 1, 1-Trichloroethane
	Xylene
	Cyclohexanone
	Butyl carbitol acetates
	Trichloroethylene
	Methyl isobutyl ketone
	Methyl ethyl ketone
	Unknown Solvents

(See Appendix V for specific analytical methods)

APPENDIX II

	Ignitibility Flash Point	Corrosivity pH	Reactivity	EP Toxicity	Listed Waste	Remarks
Photoresist Stripper J100		2-5			D002	
Waste Cyanide Solution		9-13	✓		D003	
Lead Containing Dust Powder		6.2*		✓ Lead	D008	*With DI Water
Arsenic Waste		3.4		✓ Arsenic	D004	
Neutraclean Solution	100C	7.5-8				Non Hazardous
Water/Carbon Particles		2-4		✓ Lead	D008 F002	90% Water Remainder Solvent
Molybdenum Paste	100C	7.0			F002 F003 F005	Spent Halogenated and Non-Halogenated Solvents
Green Sheets Ceramic		4.8*				*Leachate NON- HAZARDOUS
MLC Waste Solvent	20-22C	6.7			D001	93-96% MeOH; 2-5% MIBK

(See Appendix V for specific analytical methods)

IBM-E

	Ignitibility Flash Point	Corrosivity pH	Reactivity	EP Toxicity	Listed Waste	Remarks
Boiler Soot		2.2 On Leachate		✓ Mercury	D002 D009	
Novaculite	100C	6.5-7				Non Hazardous
Perchloroethylene & Flux	43-49C	5			F002	
Mercury ORM-B				✓ Mercury	D009	Light Bulbs
Spent Charcoal	<60°C				D001	
Calcium Fluoride Cake		11-13			F006	
Iodine/Potassium Iodide		2.0-5.5			D002	Precious Metal Recovery
Neutragold Solution	100C	5-8	✓		D003	Precious Metal Recovery
Palladium Chloride		2-3			D002	Previous Metal Recovery
Techni-Strip		9.7-12	✓		D003	Precious Metal Recovery
Nickel Boron		6-6.5				NON HAZARDOUS

(See Appendix V for specific analytical methods)

	Ignitibility Flash Point	Corrosivity pH	Reactivity	EP Toxicity	Listed Waste	Remarks
Immersion Gold		5				Precious Metal Recovery
Everite & Gold Solution		0.0			D002 D008	Precious Metal Recovery
Lead Waste Slurry	<60°C	7.0			D001	Waste Solvent Solution
AZ Resist	20-63C	5-6			D001	

(See Appendix V for specific methods)

APPENDIX II

CONTINGENCY PLAN

IDENTIFICATION AND EVALUATION OF POTENTIAL HAZARDOUS SUBSTANCE SPILL INCIDENTS

The following tables present information on potential hazardous substance spill incidents which could occur on the East Fishkill site. To simplify the presentation of this information, the hazardous substances stored on-site have been divided into three systems: solvent, fluoride, and acid materials based on the chemical properties of the material or the use of the materials in a particular waste treatment system.

This information includes: the form of the material, the hazardous substance system (solvent, fluoride, or acid), the tank location (ie: Building 309, etc), the specific tank number, the hazardous substance stored in the tank (based on 40 CFR 116, Listed Hazardous Substance), the tank capacity, and the type of spill containment provided for the tank. The following abbreviations describe the tank material of construction:

S - steel
SS - stainless steel
LS - lined steel
C - concrete
FRP - fiberglass reinforced plastic

These tables also provide an evaluation of the types of spills that could be encountered at each storage tank. Three spill designations have been identified for storage tanks:

Spill Designation	Description of Spill
A	Rupture of tank resulting in total (or significant) sudden loss of contents.
B	Leak of tank contents.
C	Spill during tank loading/unloading operation.

Each of these spill designations have been evaluated with respect to the probability of such a spill (i.e., low moderate or high), and the severity or impact of such an incident if it were to occur (i.e., low, moderate or high). Furthermore, each table describes the consequence of a particular spill, such as the path of any spill, whether the hazardous substance could enter a drainage system, or whether the existing containment is sufficient to confine the spill. A brief summary of responses on the part of the plant operators

IDENTIFICATION AND EVALUATION (CON'T)

(and others) is also included which indicates critical procedures which must be followed for each spill designation.

The tables also provide a description of hazardous substance transfer facilities associated with the various storage tanks. Transfer facilities refer to all pumps, force mains, gravity lines, valves, or other controls associated with the transfer of hazardous substances. Included in these tables is information regarding the material being transferred, point to point transfer, an estimate of the spill rate or spill volume, and a brief description of the transfer operation (i.e., pumped or gravity flow, above-or below-grade). These tables also provide an evaluation f the types of spills that could be encountered in each transfer system. Three spill (or leak) designations have been identified for each hazardous substance transfer system and are as follows:

Spill Designation	Description of Spill
D	Spill during transfer of materials through above-grade pumping and piping systems.
E	Leak during transfer of materials through below-grade piping systems.
F	Spill or leak during handling of storage drums.

Probability and severity of incident have also been evaluated for each transfer system. As with the previous tables, the consequence of each incident and a summary of the required response is present for each spill designation.

For further details on specific spill response measures, refer to Sections entitled Contingency Plan Preparedness and Prevention.

IDENTIFICATION AND EVALUATION OF POTENTIAL SPILL INCIDENTS

Tank Number	134
Material Stored/Form	Methylene Chloride/Waste
Location	Building 309 Tank Farm
Tank Capacity	10,000 gal.
Tank Material	Steel
Containment	Below-grade Tank
Storm Drain Gate	5 (See Fig.U3)
Loading/Unloading Area	6 (See Fig.U1)

IMPORTANT: ALL SPILLS MUST BE REPORTED IMMEDIATELY TO EMERGENCY CONTROL (Ext. 4-3333)

Spill Designation	Spill Probability	Spill Severity	Spill Consequence And Response
Tank Rupture	Low	High	Spill would be absorbed by surrounding soil. Immediate clean-up would require removal of tank contents and excavation of contaminated soil for off-site disposal by a licensed outside contractor.
Tank Leak	Moderate	Moderate	Same as tank rupture.
Loading/ Unloading	Moderate	Low	Spill would be completely contained within loading/ unloading pad. Verify correct positioning of pad drainage control valves. Close storm drain gate downstream from spill as a precautionary measure. Spill contents would be removed for off-site disposal by a licensed outside contractor.

IDENTIFICATION AND EVALUATION OF POTENTIAL SPILL INCIDENTS

Tank Number	135
Material Stored/Form	n-butyl acetate/waste
Location	Building 309 Tank Farm
Tank Capacity	10,000 gal.
Tank Material	Steel
Containment	Below-grade Tank
Storm Drain Gate	5 (See Fig. 3)
Loading/Unloading Area	6 (See Fig. 1)

* *
* IMPORTANT: ALL SPILLS MUST BE REPORTED *
* IMMEDIATELY TO EMERGENCY CONTROL (Ext. 4-3333) *
* *

Spill Designation	Spill Probability	Spill Severity	Spill Consequence And Response
Tank Rupture	Low	High	Spill would be absorbed by surrounding soil. Immediate clean-up would require removal of tank contents and excavation of contaminated soil for off-site disposal by a licensed outside contractor.
Tank Leak	Moderate	Moderate	Same as tank rupture.
Loading/ Unloading	Moderate	Low	Spill would be completely contained within loading/ unloading pad. Verify correct positioning of pad drainage control valves. Close storm drain gate downstream from spill as a precautionary measure. Spill contents would be removed for off-site disposal by a licensed outside contractor.

IDENTIFICATION AND EVALUATION OF POTENTIAL SPILL INCIDENTS

Tank Number	136
Material Stored/Form	1,1,2-trichloro-1,2,2-trifluoroethane
Location	Building 309 Tank Farm
Tank Capacity	10,000 gal.
Tank Material	Steel
Containment	Below-grade Tank
Storm Drain Gate	5 (See Fig. 3)
Loading/Unloading Area	6 (See Fig. 1)

* *
* IMPORTANT: ALL SPILLS MUST BE REPORTED *
* IMMEDIATELY TO EMERGENCY CONTROL (Ext. 4-3333) *
* *

Spill Designation	Spill Probability	Spill Severity	Spill Consequence And Response
Tank Rupture	Low	High	Spill would be absorbed by surrounding soil. Immediate clean-up would require removal of tank contents and excavation of contaminated soil for off-site disposal by a licensed outside contractor.
Tank Leak	Moderate	Moderate	Same as tank rupture.
Loading/ Unloading	Moderate	Low	Spill would be completely contained within loading/ unloading pad. Verify correct positioning of pad drainage control valves. Close storm drain gate downstream from spill as a precautionary measure. Spill contents would be removed for off-site disposal by a licensed outside contractor.

IDENTIFICATION AND EVALUATION OF POTENTIAL SPILL INCIDENTS

Tank Number	137
Material Stored/Form	Perchloroethylene/Waste
Location	Building 309 Tank Farm
Tank Capacity	10,000 gal.
Tank Material	Steel
Containment	Below-grade Tank
Storm Drain Gate	5 (See Fig. 3)
Loading/Unloading Area	6 (See Fig. 3).

* *
* IMPORTANT: ALL SPILLS MUST BE REPORTED *
* IMMEDIATELY TO EMERGENCY CONTROL (Ext. 4-3333) *
* *

Spill Designation	Spill Probability	Spill Severity	Spill Consequence And Response
Tank Rupture	Low	High	Spill would be absorbed by surrounding soil. Immediate clean-up would require removal of tank contents and excavation of contaminated soil for off-site disposal by a licensed outside contractor.
Tank Leak	Moderate	Moderate	Same as tank rupture.
Loading/ Unloading	Moderate	Low	Spill would be completely contained within loading/ unloading pad. Verify correct positioning of pad drainage control valves. Close storm drain gate downstream from spill as a precautionary measure. Spill contents would be removed for off-site disposal by a licensed outside contractor.

IDENTIFICATION AND EVALUATION OF POTENTIAL SPILL INCIDENTS

Tank Number	138
Material Stored/Form	Isopropanol/Waste
Location	Building 309 Tank Farm
Tank Capacity	10,000 gal.
Tank Material	Steel
Containment	Below-grade Tank
Storm Drain Gate	5 (See Fig. 3)
Loading/Unloading Area	6 (See Fig. 4)

IMPORTANT: ALL SPILLS MUST BE REPORTED IMMEDIATELY TO EMERGENCY CONTROL (Ext. 4-3333)

Spill Designation	Spill Probability	Spill Severity	Spill Consequence And Response
Tank Rupture	Low	High	Spill would be absorbed by surrounding soil. Immediate clean-up would require removal of tank contents and excavation of contaminated soil for off-site disposal by a licensed outside contractor.
Tank Leak	Moderate	Moderate	Same as tank rupture.
Loading/ Unloading	Moderate	Low	Spill would be completely contained within loading/ unloading pad. Verify correct positioning of pad drainage control valves. Close storm drain gate downstream from spill as a precautionary measure. Spill contents would be removed for off-site disposal by a licensed outside contractor.

APPENDIX III

BULK WASTES

DESCRIPTION	TANK #	CAPACITY	SAMPLING PARAMETER
Waste Methylene Chloride	134	10,000 Gal.	pH
n-butyl acetate	135	10,000 Gal.	Flash point
1,1,2-trichloro-1,2,2-trifluoroethane	136	10,000 Gal.	pH
Waste Perchloroethylene (Tetrachloroethylene)	137	10,000 Gal.	pH
Waste Isopropyl Alcohol	138	10,000 Gal.	Flash point

All tanks will be sampled and analyzed each shipment.

(See Appendix V for specific analytical methods)

APPENDIX IV

CONTAINERIZED HAZARDOUS WASTE

Waste Number	Waste Description
P016	Bis (choloromethyl) ether
F005	Carbon disulfide
P120	Vanadium pentoxide
U001	Acetaldehyde
U004	Acetophenone
U009	Acrylonitrile
U023	Benzotrichloride
U043	Chloroethene
U045	Chloromethane
F004	Cresols
U056	Cyclohexane
U122	Formaldehyde
U123	Formic acid
U134	Hydrofluoric acid
U147	Maleic anhydride
U190	Phthalic anhydride
F005	Pyridine
U197	p-Benzoquinone
U210	Tetrachloromethane
U213	Tetrahydrofuran = diethylene oxide
F004	Nitrobenzene
U019	Benzene
F003	n-Butyl alcohol
F002	Chlorobenzene
F003	Cyclohexanone
U070	1,2-Dichlorobenzene
F003	Ethyl acetate
U134	Hydrofluoric acid
D001	Isobutyl alcohol
F005	Methyl ethyl ketone
F003	Methyl isobutyl ketore
U188	Phenol
U211	Tetrachloromethane
U210	Tetrachloroethane
F005	Toluene
F001	1,1,1-Trichloroethane
U228	Trichloroethene
F003	Xylene
D002	Acetic acid
D006	Cadmium
D001	Ethyl cellosolve
D001	Cellosolve acetate
F003	Ethyl benzene
D002	Corrosive waste

WASTE NUMBER	WASTE DESCRIPTION
D003	Potassium cyanide
D003	Sodium cyanide
D003	Cyanides
D009	Mercury
D002	J-100 Photoresist Stripper
U144	Lead acetate
F003	Methanol
F001	1,1,2-trichloro-1,2,2-trifluoroethane
F002	Methylene chloride
F003	Acetone
F005	Molybdenum paste
F007	Spent Cyanide plating bath solutions
F009	Spent stripping and cleaning bath solutions from cyanide electroplating operations
D002, D009	Boiler Soot
D008	Lead
D004	Arsenic
D001	Isopropyl alcohol
F006	Wastewater treatment sludges from electroplating operations
F001	Tetrachloroethylene (perchloroethylene)
D001	AZ resist
D002	Iodine/Potassium Iodide
D001	MLC Waste Solvent
D001	Spent Activated Carbon

(See Appendix V for specific analytical methods)

APPENDIX V

	WASTE	SAMPLE METHOD (1)	SAMPLER (2)	ANALYSIS PARAMETER (3,4)	ANALYSIS (1) METHOD
A.	D001	SW846	Coliwasa	*Composition	8.80-1 GC-Direct Injection
	F001	Section 3.2.1		*Flash Point	ASTM D3278-78 - Setaflash Closed Cup
	F002			Ash Content	ASTM D482-80
	F003				
	F004			BTU Value	ASTM 240-76 - Bomb Calorimetry
	F005			Total	ASTM E256-67
	D002 (J-100 Photoresist Stripper)			*Corrosivity (5)	EPA 600 150-1
				*Specific Gravity	ASTM D1217-54
				*Residue	EPA 600 160.3

(1) Sampling and analysis methods on this page are for liquid samples only.

(2) Coliwasa tubes are constructed of glass and polyethylene for sampling drums and bulk shipments, respectively.

(3) Samples from all bulk shipments are analyzed for all listed parameters.

(4) Samples from drums are analyzed for all listed parameters when preparing Schedule "A" each year. Otherwise the routine analysis consists only of the parameters preceeded by an *.

(5) Corrosivity tests performed on water extract and is often not applicable.

	WASTE #	SAMPLE METHOD	SAMPLER	ANALYSIS PARAMETER	ANALYSIS METHOD
B.	D001 (Spent Activated Carbon)	SW846 3.2.4	Thief	Volatile Organics	SW846 - 8.83 Purge and Trap Method (1)
C.	F005 (Molybdenum Paste)	SW846 3.2.5	Trier or Scoop	Volatile Organics	SW846 8.82 Head Space Method
		3.2.7		Total Solids	EPA 600 160.3
				Flash Point	ASTM D3278-78-Setaflash Closed Cup

(1) Total Volatile Organics scan is run on water entering and leaving Activated Carbon. Concentration of Organics as individual species is calculated using difference in input/output, the throughput gallonage, and the weight of Carbon in the beds.

	WASTE #	SAMPLE METHOD	SAMPLER	ANALYSIS PARAMETER	ANALYSIS METHOD
D.	D003	SW846		pH (corrosivity)	EPA 600 150-1
	F007	3.2.1	Coliwasa Glass	Specific Gravity Cyanide (free)	ASTM D1217-54 (Liebig 1851) Silver Ion Titration
	F009			Cyanide (Total)	SW8.55 Distillation-colormetric
E.	F006	SW846 3.2.5	Trier or	E.P. Toxicity (1) (Metals)	SW846 7.0, 7.1 EPA-600/4-79-020
		or 3.2.7	Scoop	Fluoride	Std. Methods 15th Ed 413A, 413E
				% Moisture	Moisture balance - Auto
				Corrosivity	EPA 600 150-1
F.	D002, D009 (Boiler Soot)	SW846 3.2.4	Thief	EP Toxicity (1) (Metals)	SW846 7.0, 7.1 EPA 600/4-79-020
				Corrosivity	EPA 600 150-1
G.	D002 Iodine/ Potassium	SW846 3.2.1	Coliwasa	EP Toxicity (1) (metals) Corrosivity	SW846 7.0, 7.1 EPA 600/4-79-020 EPA 600 150-1

(1) E.P. toxicity analyses only for those metals suspected to be present.

	WASTE #	SAMPLE METHOD	SAMPLER	ANALYSIS PARAMETER	ANALYSIS METHOD
H.	D002 (Acetic Acid)	SW846 3.2.1 or 3.2.4	Coliwasa or Thief	Corrosivity	EPA 600 150-1
I.	D004 (Arsenic)	SW846 3.2.4, 3.2.5, or 3.2.7	Thief, Trier, or Scoop	Arsenic	EPA 600/4-79-020
J.	D006 (Cadmium)	SW846 3.2.4, 3.2.5, or 3.2.7	Thief, Trier, or Scoop	Cadmium	EPA 600/4-79-020
K.	D008 (Lead)	SW846 3.2.4, 3.2.5, or 3.2.7	Thief, Trier or Scoop	Lead	EPA 600/4-79-020
L.	D009 (Mercury)	SW846 3.2.4, 3.2.5, or 3.2.7	Thief, Trier or Scoop	Mercury	EPA 600/4-79-020
M.	D002 Corrosive Waste	SW846 (1) 3.2.7	Trowel or Scoop	Corrosivity E.P. Toxicity (1,2) (Metals)	EPA 600 150-1 EPA 600-4-79-020
N.	All Waste Numbers beginning with a "U" or "P"	USE MSDS MATERIALS SAFETY DATA SHEETS BECAUSE THEY ARE KNOWN WASTES. EITHER EXPIRED SHELF LIFE OR DISCONTINUED USE.			

(1) RESIDUE ON CONTAMINATED MATERIAL IS SAMPLED AND ANALYZED.

(2) E.P. TOXICITY ANALYSES ONLY FOR THOSE METALS SUSPECTED TO BE PRESENT.

International Business Machines Corporation

East Fishkill Facility, Route 52
Hopewell Junction, New York 12533
914/897-2121

February 29, 1984

U.S. EPA Region II
Permits Administration Branch
Room 432, 2PM-P A-H
26 Federal Plaza
New York, New York 10007

Subject: 1983 Biennial Hazardous Waste Reports for Facility
NYD000707901

Gentlemen:

Attached is the Facility and Generator Biennial Hazardous Waste Report for the IBM East Fishkill Facility, Route 52, Hopewell Junction, New York.

Please contact me on (914) 894-7707 if you have any questions.

Sincerely,

International Business
Machines Corporation

H. W. Shimmin, Jr.
Manager, Site
Env. Engineering

HWS/SD-jms

Attachment

Do not make entries in shaded areas

OMB #: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

FACILITY BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

See instructions before completing this section.

This facility did not treat, store, or dispose of regulated quantities of hazardous waste at any time during 1983. . . . . ☐

Explain your non-regulated status in the space below.

Please print/type with elite type (12 characters per inch)

II. FACILITY EPA I.D. NUMBER

T/A C

F N Y D 0 0 0 7 0 7 9 0 1 1 1

1 2 13 14 15

This Facility's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other (explain in comment section)

C303 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF FACILITY

INTERNATIONAL BUSINESS MACHINES CORP.

30 69

IV. FACILITY MAILING ADDRESS

3 ROUTE 52

15 16 45

Street or P.O. Box

4 HOPEWELL JUNCTION | NY | 12533

15 16 41 42 47 51

City or Town | State | Zip Code

V. LOCATION OF FACILITY (if different than section IV above)

5

15 16 45

Street or Route number

6

15 16 41 42 47 51

City or Town | State | Zip Code

VI. FACILITY CONTACT

2 H. W. SHIMMIN, JR.

15 16 45

Name (last and first)

914-894-7707

46 55

Phone No. (area code & no.)

VII. COST ESTIMATES FOR FACILITIES

$ ___ 360 613

16 19 22

A. Cost Estimate for Facility Closure

N/A

$ ___ , ___ , ___

25 28 31

B. Cost Estimate for Post Closure Monitoring and Maintenance (disposal facilities only)

VIII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

H. W. SHIMMIN, JR.; MGR., SITE ENV. ENG. [signature] 2-29-84

Print/Type Name | Title | Signature of Authorized Representative | Date Signed

EPA Form 8700-13B(5-80) (Revised 11-83)

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Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENC

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO. T/A C

FNYD 0 0 0 7 0 7 9 0 1 1
1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

GNYD 0 0 0 7 0 7 9 0 1
16 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

INTERNATIONAL BUSINESS MACHINES CORP. ON-SITE ☑

XII. GENERATOR ADDRESS

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 [3 0 6 2 5 0] [P] (AMOUNT OF WASTE / UOM) S02 [1 2 5 0 0 0] [P] (AMOUNT OF WASTE / UOM) S03 [ ] [ ] (AMOUNT OF WASTE / UOM)

S04 [ ] [ ] (AMOUNT OF WASTE / UOM) S05 [ ] [ ] (AMOUNT OF WASTE / UOM)

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
29-32	1	MISC. LAB-PACK CHEMICALS	D001 D002 D003 D004 (33-36, 37-40, 41-44, 45-48)	D81 (49-51)	95777 (52-60)	P (61)
	2		D007 D008 D009 F001			
	3	WATER/GASOLINE MIXTURE	D001	T38	1322	G
	4	LAB PACK CHEMICAL	D001	T18	6	P
	5	LAB PACK CHEMICAL	D001	T34	2	P
	6	LAB PACK CHEMICAL	D002	T18	2	P
	7	LAB PACK CHEMICAL	D003	T18	3	P
	8	LAB PACK CHEMICAL	D003	T18	3	P
	9	WASTE CORROSIVE SOLID	D002	D81	15790	P
	10	HAZARDOUS WASTE SOLID (CARBON)	U210 U228 U079 D001	T18	3627115	P
	11	FLAMMABLE SOLID (CONTAMINATED SOIL)	D001	D81	30660	P
	12	WASTE CYANIDE SOLUTION	D003	T22	129650	P

XV. COMMENTS (enter information by section number—see instructions)

STORAGE 02: 8.34 #/GALLONS

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ENVIRONMENTAL PROTECTION AGEN

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO. T/A C

F N Y D 0 0 0 7 0 7 9 0 1 1
1 2 13 14 15

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

INTERNATIONAL BUSINESS MACHINES CORP. ON-SITE ☒

XII. GENERATOR ADDRESS

X. GENERATOR'S EPA I.D. NO.

G N Y D 0 0 0 7 0 7 9 0 1
16 28

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
29 32	1		33 36 / 37 40 / 41 44 / 45 48	T 2 7 / 49 51	52 60	61
	2			T 3 1		
	3	SOLIDS CONTAMINATED WITH METHANOL AND MIBK	D 0 0 1	T 0 7	6 7 5 6 0	P
	4	WASTE METHANOL/MIBK SOLUTION	D 0 0 1	T 0 6	2 1 6 2 6 0	P
	5	BULK WASTE SOLVENT	F 0 0 1 / F 0 0 2 / F 0 0 3 / F 0 0 4	T 0 6	4 4 3 3 3 4 5	P
	6		F 0 0 5			
	7	J-100 LIQUID	F 0 0 1 / F 0 0 2 / F 0 0 3	T 0 6	2 2 0 1 5 5	P
	8	J-100 CONTAMINATED SOLIDS	F 0 0 1 / F 0 0 2 / F 0 0 3	T 0 7	2 6 4 7 5	P
	9	J-100 EMPTY BOTTLES	F 0 0 1 / F 0 0 2 / F 0 0 3	T 0 7	3 8 7 6 0	P
	10					
	11					
	12					

XV. COMMENTS (enter information by section number—see instructions)

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Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO. T/A C

F N Y D 0 0 0 7 0 7 9 0 1 1

X. GENERATOR'S EPA I.D. NO.

G N Y D 0 0 0 7 0 7 9 0 1

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

INTERNATIONAL BUSINESS MACHINES CORP. ON-SITE ☒

XII. GENERATOR ADDRESS

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
	1	SOLIDS CONTAMINATED WITH METHANOL/MIBK SOL.	D001	D81	59675	P
	2	WASTE METHANOL/MIBK SOL.	D001	S01	87925	P
	3			S02		
	4			S04		
	5	WASTE ACID DRUMS	D002	D81	13104	P
	6	WASTE CYANIDE SOL.	D003	S04	125700	P
	7	CORROSIVE CONTAMINATED SOLIDS	D002	D81	9540	P
	8	ORGANIC CONTAMINATED SOIL	F001 F002 F003 F004		1095105	P
	9	CORROSIVE CONTAMINATED SOIL	F005		634800	P
	10					
	11	WASTE CYANIDE DRUMS	D003	D81	550	P
	12	WASTE ACID ETCH DRUMS	D002	D81	27336	P

XV. COMMENTS (enter information by section number—see instructions)

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Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGEN[illegible]

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO. T/A C

F	N	Y	D	0	0	0	7	0	7	9	0	1		1
1	2											13	14	15

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

INTERNATIONAL BUSINESS MACHINES CORP. ON-SITE ☒

XII. GENERATOR ADDRESS

X. GENERATOR'S EPA I.D. NO.

G	N	Y	D	0	0	0	7	0	7	9	0	1
16												28

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 [AMOUNT OF WASTE] [UOM] S02 [AMOUNT OF WASTE] [UOM] S03 [AMOUNT OF WASTE] [UOM]

S04 [AMOUNT OF WASTE] [UOM] S05 [AMOUNT OF WASTE] [UOM]

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
29 32	1	REMOVED CORROSIVE TANKS	D002 (33 36) F002 (37 40) / F003 (41 44) F004 (45 48)	D81 (49 51)	26900 (52 60)	P (61)
	2	RAGS CONTAMINATED WITH CORROSIVES	D002	D81	67900	P
	3	MOLY PASTE JARS	F001 F002 / F003 F004	D81	12030	P
	4		F005			
	5	REMOVED SOLVENT TANK	F001 F002 / F003 F004	D81	12405	P
	6		F005			
	7	WASTE SOLVENT	F001 F002 / F003 F004	S01	39550	P
	8		F005			
	9					
	10					
	11					
	12					

XV. COMMENTS (enter information by section number—see instructions)

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Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENC.

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO. T/A C

F N Y D 0 0 0 7 0 7 9 0 1 1
1 2 13 14 15

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

INTERNATIONAL BUSINESS MACHINES CORP. ON-SITE ☒

XII. GENERATOR ADDRESS

X. GENERATOR'S EPA I.D. NO.

G N Y D 0 0 0 7 0 7 9 0 1
16 28

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
29-32	1	ARSENIC AND QUARTZ	D004 (33-36) (37-40) (41-44) (45-48)	S01 (49-51)	31450 (52-60)	P (61)
	2	WATER/CARBON RESIDUE	D002 D008	T29	19125	P
	3	NICKEL BORON	F007	T29	132020	P
	4	WASTE CYANIDE SOL.	D003	T29	37975	P
	5	GREEN SHEETS	D004 D008	D81	67065	P
	6	CORROSIVE CONTAMINATED SOIL	D002	D81	19720	P
	7	FLUORIDE SLUDGE	F006	D81	449507 5	P
	8	MOLY PASTE JARS	F002	D81	66971	P
	9					
	10	MISC. LAB PACK CHEMICALS	D002	D81	15	P
	11	BOILER SOOT	D002 D009	D81	11570	P
	12					

XV. COMMENTS (enter information by section number—see instructions)

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Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO.

T/A C

F N Y D 0 0 0 7 0 7 9 0 1 | | 1

(1 2 ... 13 14 15)

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

INTERNATIONAL BUSINESS MACHINES CORP. ON-SITE ☒

XII. GENERATOR ADDRESS

X. GENERATOR'S EPA I.D. NO.

G N Y D 0 0 0 7 0 7 9 0 1

(16 ... 28)

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM | S02 AMOUNT OF WASTE UOM | S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM | S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
29 ... 32	1	PERCHLOROETHYLENE	F 0 0 2 (33 ... 36 / 37 ... 40) (41 ... 44 / 45 ... 48)	T 6 3 (49 ... 51)	4 0 5 0 0 (52 ... 60)	P (61)
	2	ISOPROPANOL	D 0 0 1	T 6 3	1 2 3 8 4 0	P
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XV. COMMENTS (enter information by section number—see instructions)

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ENVIRONMENTAL PROTECTION AGEN

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO. T/A C

F N Y D 0 0 0 7 0 7 9 0 1 1
1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

G N Y D 0 0 0 7 0 7 9 0 1
16 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

INTERNATIONAL BUSINESS MACHINES ON-SITE ☒

XII. GENERATOR ADDRESS

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM
S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
9 32	1	SOLIDS CONTAMINATED WITH SOLVENTS	F001 F002 F002 F004 (33 36 37 40 / 41 44 45 48)	S01 (49 51)	21600 (52 60)	P (61)
	2		F005			
	3	SOLIDS CONTAMINATED WITH METHANOL/MIBK	D001	S01	16000	P
	4	WASTE METHANOL/MIBK SOLUTION	D001	S01	25200	P
	5	J-100 LIQUID	F001 F002 F003	S01	40000	P
	6	J-100 CONTAMINATED SOLIDS	F001 F002 F003	S01	18000	P
	7	J-100 EMPTY BOTTLES	F001 F002 F003	S01	14400	P
	8	ARSENIC & QUARTZ	D004	S01	11200	P
	9	WATER & CARBON	D002 D018	S01	37600	P
	10	WASTE CAUSTIC DRUMS	D002	S01	1100	P
	11	WASTE ACID DRUMS	D002	S01	2000	P
	12					

XV. COMMENTS (enter information by section number—see instructions)

o ON-SITE STORAGE

o STORAGE OF WASTES DESTINED FOR PRECIOUS METALS RECOVERY < 90 DAYS

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Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGEN

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO. T/A C

F N Y D 0 0 0 7 0 7 9 0 1 1 (1 2 ... 13 14 15)

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

INTERNATIONAL BUSINESS MACHINES ON-SITE ☑

XII. GENERATOR ADDRESS

X. GENERATOR'S EPA I.D. NO.

G N Y D 0 0 0 7 0 7 9 0 1 (16 ... 28)

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM

S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
9 32	1	WASTE ACID ETCH	D 0 0 2 (33 36) (37 40) (41 44) (45 48)	S 0 1 (49 51)	3 5 0 0 (52 60)	P (61)
	2	EPOXY & SOLVENTS	D 0 0 2	S 0 1	5 4 0 0	P
	3	CYANIDE	D 0 0 3	S 0 1	3 2 4 0 0	P
	4	MOLY PASTE JARS	F 0 0 1 F 0 0 2 F 0 0 3 F 0 0 4	S 0 1	1 5 0 0 0	P
	5		F 0 0 5			
	6	SOLIDS CONTAMINATED WITH CORROSIVES	D 0 0 2	S 0 1	3 0 0 0 0	P
	7	RESISTS & SOLVENTS	F 0 0 1 F 0 0 2 F 0 0 3 F 0 0 4	S 0 1	2 1 6 0 0	P
	8		F 0 0 5			
	9	WASTE ISOPROPANOL	D 0 0 1	S 0 2	2 5 0 0 0	P
	10	WASTE PERCHLOROETHYLENE	F 0 0 1	S 0 2	2 5 0 0 0	P
	11	WASTE FREON	F 0 0 1	S 0 2	2 5 0 0 0	P
	12					

XV. COMMENTS (enter information by section number—see instructions)

ON-SITE STORAGE

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Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGEN

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO. T/A C

F N Y D 0 0 0 7 0 7 9 0 1 1 1
1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

G N Y D 0 0 0 7 0 7 9 0 1
16 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

INTERNATIONAL BUSINESS MACHINES ON-SITE ☒

XII. GENERATOR ADDRESS

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM
S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
9 32	1	WASTE N-BUTYL ACETATE	D 0 0 1 (33 36) (37 40) (41 44) (45 48)	S 0 2 (49 51)	2 5 0 0 0 (52 60)	P (61)
	2	WASTE METHYLENE CHLORIDE	F 0 0 2	S 0 2	2 5 0 0 0	P
	3	MISC. LAB PACK CHEMICALS	D 0 0 1, D 0 0 2, D 0 0 3, D 0 0 4	S 0 1	1 1 2 5 0	P
	4		D 0 0 7, D 0 0 8, D 0 0 9, F 0 0 1			
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XV. COMMENTS (enter information by section number—see instructions)

ON-SITE STORAGE

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IBM-EF-69

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENC.

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO. T/A C

F N Y D 0 0 0 7 0 7 9 0 1 1 1
(1 2 ... 13 14 15)

X. GENERATOR'S EPA I.D. NO.

G N Y D 0 0 0 7 0 7 8 9 3
(16 ... 28)

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

INTERNATIONAL BUSINESS MACHINES CORP. ON-SITE ☒

XII. GENERATOR ADDRESS

ROUTE 9
FISHKILL, NY 12540

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 [AMOUNT OF WASTE] [UOM] S02 [AMOUNT OF WASTE] [UOM] S03 [AMOUNT OF WASTE] [UOM]
S04 [AMOUNT OF WASTE] [UOM] S05 [AMOUNT OF WASTE] [UOM]

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
29–32	1	WASTE HYDROFLUORIC ACID SOLUTION	D 0 0 2 (33–36) (37–40) (41–44) (45–48)	T 2 3 (49–51)	1 0 4 2 5 0 (52–60)	P (61)
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XV. COMMENTS (enter information by section number—see instructions)

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Do not make entries in shaded areas

OMB#: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other ______

C303 ENTRY (OFFICIAL USE ONLY): ☐

Please print/type with elite type (12 characters per inch)

II. GENERATOR'S EPA I.D. NUMBER

T/A C

F NYD000707901 1

III. NAME OF INSTALLATION

INTERNATIONAL BUSINESS MACHINES CORP.

IV. INSTALLATION MAILING ADDRESS

3 ROUTE 52

Street or P.O. Box

4 HOPEWELL JUNCTION NY 12533

City or Town State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5

Street or Route number

6

City or Town State Zip Code

VI. INSTALLATION CONTACT

2 H. W. SHIMMIN, JR.

Name (last and first)

914-894-7707

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

H. W. SHIMMIN, JR., MGR., SITE ENV. ENG. [signature] 2-29-84

Print/Type Name Title Signature of Authorized Representative Date Signed

EPA Form 8700-13A(5-80) (Revised 11-83)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

1	2											13	14	15
G	N	Y	D	0	0	0	7	0	7	9	0	1		1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

ENSCO

X. FACILITY'S EPA I.D. NO.

16												28
F	A	R	D	0	6	9	7	4	8	1	9	2

XI. FACILITY ADDRESS

AMERICAN ROAD
EL DORADO, ARKANSAS

XII. TRANSPORTATION SERVICES USED

ENSCO ARD069748192

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29–32	1	SOLIDS CONTAMINATED WITH METHANOL AND MIBK	09 (33–34)	D001 (35–38, 39–42, 43–46, 47–50)	67560 (51–59)	P (60)
	2	WASTE METHANOL/MIBK SOLUTION	08	D001	216260	P
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

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XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGEI /

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G	N	Y	D	0	0	0	7	0	7	9	0	1	T/A	C
1	2											13	14	15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

MCKESSON ENVIROSYSTEMS

X. FACILITY'S EPA I.D. NO.

F	K	Y	D	0	5	3	3	4	8	1	0	8
16												28

XI. FACILITY ADDRESS

INTERSTATE HIGHWAY 71
NEW CASTLE, KENTUCKY 40050

XII. TRANSPORTATION SERVICES USED

KRAJACK TANK LINES NJD004857843

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	ISOPROPANOL	0 8 (33 34)	D 0 0 1 (35 38) (39 42) (43 46) (47 50)	4 1 7 0 0 (51 59)	P (60)
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

IBM-EF- 60

IBM-EF- 60

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGE Y

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

1	2										13	14	15
G	N	Y	D	0	0	0	7	0	7	9	0	1	1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

EMERGENCY TECN. SERVICE CORP.

X. FACILITY'S EPA I.D. NO.

16												28
F	N	J	D	0	0	0	6	9	2	0	5	3

XI. FACILITY ADDRESS

RT. 515
VERNON, NJ 07462

XII. TRANSPORTATION SERVICES USED

EMERGENCY TECH. SERVICES CORP. NJD000692053

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	LAB PACK CHEMICALS	0 8 (33 34)	D 0 0 1 (35 38 39 42)	6 (51 59)	P (60)
	2	LAB PACK CHEMICALS	1 2	D 0 0 1	2	P
	3	LAB PACK CHEMICALS	0 2	D 0 0 2	2	P
	4	LAB PACK CHEMICALS	0 9	D 0 0 3	3	P
	5	LAB PACK CHEMICALS	1 8	D 0 0 3	3	P
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

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IBM-EF- 69

IBM-EF- 69

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGE[illegible]

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

G N Y D 0 0 0 7 0 7 9 0 1 1 1
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

MARISOL

X. FACILITY'S EPA I.D. NO.

F N J D 0 0 2 4 5 4 5 4 4
16 28

XI. FACILITY ADDRESS

125 FACTORY LANE
MIDDLESEX, NEW JERSEY

XII. TRANSPORTATION SERVICES USED

KRAJACK TANK LINES NJD004857843
MARISOL INC. NJD002454544

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	PERCHLOROETHYLENE	15 (33 34)	F002 (35 38 / 39 42 / 43 46 / 47 50)	40500 (51 59)	P (60)
	2	ISOPROPANOL	08	D001	88140	P
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

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IBM-EF- 69

IBM-EF- 69

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGE Y

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

G N Y D 0 0 0 7 0 7 9 0 1 1 1

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

ROLLINS ENV. SERV.

X. FACILITY'S EPA I.D. NO.

F N J D 0 5 3 2 8 8 2 3 9

16 28

XI. FACILITY ADDRESS

HIGHWAY 322
BRIDGEPORT, NEW JERSEY

XII. TRANSPORTATION SERVICES USED

ROLLINS ENV. SERV. NJD053288239; G. W. BUSENHELMER NYD980526032
MATLACK INC. NJD043584101;
S & J TRANSPORT NJD071629976

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	BULK WASTE SOLVENT	0 8 (33 34)	F 0 0 1 (35 38) F 0 0 2 (39 42); F 0 0 3 (43 46) F 0 0 4 (47 50)	1 4 4 3 3 3 4 5 (51 59)	P (60)
	2			F 0 0 5		
	3	J-100 LIQUID	0 2	F 0 0 1 F 0 0 2; F 0 0 3	2 2 0 1 5 5	P
	4	J-100 CONTAMINATED SOLIDS	0 2	F 0 0 1 F 0 0 2; F 0 0 3	2 6 4 7 5	P
	5	J-100 EMPTY BOTTLES	0 2	F 0 0 1 F 0 0 2; F 0 0 3	3 8 7 6 0	P
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

IBM-EF- 60

IBM-EF- 60

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGE. Y

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

G	N	Y	D	0	0	0	7	0	7	9	0	1		1
1	2											13	14	15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

SCA CHEMICAL SERVICES

X. FACILITY'S EPA I.D. NO.

F	N	J	D	0	8	9	2	1	6	7	9	0
16												28

XI. FACILITY ADDRESS

LISTER AVENUE
NEWARK, NEW JERSEY

XII. TRANSPORTATION SERVICES USED

HISCO TRUCKING NJD060784493

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	WASTE CYANIDE SOLUTION	1 8 (33 34)	D 0 0 3 (35 38 / 39 42)	1 2 9 6 5 0 (51 59)	P (60)
	2			(43 46 / 47 50)		
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

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IBM-EF- 69

IBM-EF- 69

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGE[illegible]

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

G	N	Y	D	0	0	0	7	0	7	9	0	1		1
1	2											13	14	15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

SCA CHEMICAL SERVICES

X. FACILITY'S EPA I.D. NO.

F	N	Y	D	0	4	9	8	3	6	6	7	9
16												28

XI. FACILITY ADDRESS

BALMER ROAD
MODEL CITY, NEW YORK

XII. TRANSPORTATION SERVICES USED

SCA TRANSPORT NYD049836679; PRICE TRUCKING NYD046765574
HAUSER TRUCKING NYD000237263; TONAWANDA TANK NYD097644801
BUFFALO FUEL CO. NYD051809972

XIII. WASTE IDENTIFICATION

Sequence # (29–32)	Line #	A. Description of Waste	B. DOT Hazard code (33–34)	C. EPA Hazardous Waste No. (see instructions) (35–42)	D. Amount of Waste (43–50)	E. Unit of Measure (51–59)	(60)
	1	MISC. LAB PACK CHEMICALS	1 5	D 0 0 1 / D 0 0 2 / D 0 0 3 / D 0 0 4	9 5 7 7 7	P	
	2	CHEMICALS	1 8	D 0 0 7 / D 0 0 8 / D 0 0 9 / F 0 0 1			
	3		0 8				
	4		1 6				
	5		0 2				
	6		0 9				
	7	WASTE CORROSIVE SOLID	0 2	D 0 0 2	1 5 7 9 0	P	
	8	SOLIDS CONTAMINATED WITH METHANOL AND MIBK	0 9	D 0 0 1	5 9 6 7 5	P	
	9	WASTE METHANOL/MIBK SOLUTION	0 8	D 0 0 1	8 7 9 2 5	P	
	10	WASTE ACID DRUMS	0 2	D 0 0 2	1 3 1 0 4	P	
	11	WASTE CYANIDE SOL.	1 8	D 0 0 3	1 2 5 7 0 0	P	
	12	CORROSIVE CONTAMINATED SOLIDS	0 2	D 0 0 2	9 5 4 0	P	

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

IBM-EF- 60

IBM-EF- 60

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGE

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

G N Y D 0 0 0 7 0 7 9 0 1 1
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

SCA

X. FACILITY'S EPA I.D. NO.

F N Y D 0 4 9 8 3 6 6 7 9
16 28

XI. FACILITY ADDRESS

BALMER ROAD
MODEL CITY, NEW YORK

XII. TRANSPORTATION SERVICES USED

SCA TRANSPORT NYD049836679; PRICE TRUCKING NYD046765574
HAUSER TRUCKING NYD000237263; TONAWANDA TANK NYD097644801
BUFFALO FUEL CO. NYD051809972

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	CORROSIVE CONTAMINATED SOIL	15 (33 34)	D002 (35 38 39 42)	634800 (51 59)	P (60)
	2	ORGANIC CONTAMINATED SOIL	15	F001 F002 F003 F004	1095105	P
	3			F005		
	4	WASTE CYANIDE DRUMS	18	D003	550	P
	5	WASTE ACID ETCH DRUMS	02	D002	27336	P
	6	REMOVED CORROSIVE TANKS	02	D002	2690	P
	7	MOLY PASTE JARS	15	F001 F002 F003 F004	12030	P
	8			F005		
	9	RAGS CONTAMINATED WITH CORROSIVES	02	D002	6790	P
	10	REMOVED SOLVENT TANK	08	F001 F002 F003 F004	12405	P
	11			F005		
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Tear out here

IBM-EF- 60

IBM-EF- 60

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGE. Y

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G N Y D 0 0 0 7 0 7 9 0 1 T/A C 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

SCA CHEMICAL SERVICES

X. FACILITY'S EPA I.D. NO.

F N Y D 0 4 9 8 3 6 6 7 9

XI. FACILITY ADDRESS

BALMER ROAD
NIAGARA FALLS, NY

XII. TRANSPORTATION SERVICES USED

SCA TRANSPORT NYD049836679; PRICE TRUCKING NYD046765574
HAUSER TRUCKING NYD000237263; TONAWANDA TANK NYD097644801
BUFFALO FUEL CO. NYD051809972

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)		D. Amount of Waste	E. Unit of Measure
29-32	1	WASTE SOLVENT	08	F001	F002	39550	P
			33-34	F003	F004	35-38 / 39-42 / 43-46 / 47-50 / 51-59	60
	2			F005			
	3						
	4						
	5						
	6						
	7						
	8						
	9						
	10						
	11						
	12						

XIV. COMMENTS (enter information by section number—see instructions)

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Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGE[illegible]

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

G N Y D 0 0 0 7 0 7 9 0 1 1 1

(1 2 ... 13 14 15)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CECOS INTERNATIONAL

X. FACILITY'S EPA I.D. NO.

F N Y D 0 8 0 3 3 6 2 4 1

(16 ... 28)

XI. FACILITY ADDRESS

56TH & PINE AVENUE
NIAGARA FALLS, NY

XII. TRANSPORTATION SERVICES USED

CATARACT TRUCKING NYD012955134; CECOS NYD080336241
NIAGARA INDUSTRIAL WAREHOUSING NYD074045055
BUFFALO FUEL CO. NYD051809972; ENVIRONMENTAL TRANSPORT NYD000692061

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)		D. Amount of Waste	E. Unit of Measure
29-32	1	ARSENIC AND QUARTZ	18 (33 34)	D004 (35 ... 38)	(39 ... 42)	31450 (51 ... 59)	P (60)
	2	WATER/CARBON RESIDUE	15	D002	D008	19125	P
	3	NICKEL BORON	15	F007		13202 0	P
	4	WASTE CYANIDE SOL.	18	D003		37975	P
	5	GREEN SHEETS	15	D004	D008	67065	P
	6	CORROSIVE CONTAMINATED SOIL	02	D002		19972 0	P
	7	FLUORIDE SLUDGE	15	F006		44950 75	P
	8	MOLY PASTE JARS	15	F012		6697 1	P
	9	MISC. LAB PACK CHEMICALS	02	D002		15	P
	10						
	11	BOILER SOOT	18	D002	D009	11570	P
	12						

XIV. COMMENTS (enter information by section number—see instructions)

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IBM-EF-60

IBM-EF-60

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGE. Y

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

G	N	Y	D	0	0	0	7	0	7	9	0	1		1
1	2											13	14	15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

B & G DAWES, INC.

X. FACILITY'S EPA I.D. NO.

F	N	Y	D	9	8	0	7	5	5	7	7	1
16												28

XI. FACILITY ADDRESS

EAST ROAD, BOX 269
MARLBORO, NY 12542

XII. TRANSPORTATION SERVICES USED

B & G DAWES, INC. NYD980755771

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29 32	1	WATER/GASOLINE MIXTURE	0 8 (33 34)	D 0 0 1 (35 38 / 39 42 / 43 46 / 47 50)	1 3 2 2 (51 59)	G (60)
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

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IBM-EF- 60

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGEI /

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

1	2											13	14	15
G	N	Y	D	0	0	0	7	0	7	9	0	1		1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CECOS/CER COMPANY

XI. FACILITY ADDRESS

5092 ABER ROAD
WILLIAMSBURG, OHIO

X. FACILITY'S EPA I.D. NO.

16												28
F	)	H	D	0	8	7	4	3	3	7	4	4

XII. TRANSPORTATION SERVICES USED

B & J TRANSPORT CO NYD088658646

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29–32	1	FLAMMABLE SOLID (CONTAMINATED SOIL)	09 (33–34)	D001 (35–38, 39–42)	30660 (51–59)	P (60)
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

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IBM-EF-

IBM-EF-

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGE. Y

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

G	N	Y	D	0	0	0	7	0	7	9	0	1		1
1	2											13	14	15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CALGON CORP.

X. FACILITY'S EPA I.D. NO.

F	P	A	D	0	0	0	7	3	6	9	4	2
16												28

XI. FACILITY ADDRESS

200 NEVILLE ROAD
NEVILLE ISLAND, PA

XII. TRANSPORTATION SERVICES USED

CALGON CORP. PAD004319810

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)		D. Amount of Waste	E. Unit of Measure
29 32	1	HAZARDOUS WASTE SOLID (CARBON)	0 9 (33 34)	U 2 1 0 (35 38) U 0 7 9 (43 46)	U 2 2 8 (39 42) D 0 0 1 (47 50)	3 6 2 7 1 5 (51 59)	P (60)
	2		1 5				
	3						
	4						
	5						
	6						
	7						
	8						
	9						
	10						
	11						
	12						

XIV. COMMENTS (enter information by section number—see instructions)

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IBM-EF- 60

IBM-EF- 60

Do not make entries in shaded areas

.VIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G N Y D 0 0 0 7 0 7 9 0 1 T/A C 1

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

IBM EAST FISHKILL

X. FACILITY'S EPA I.D. NO.

F N Y D 0 0 0 7 0 7 9 0 1

XI. FACILITY ADDRESS

ROUTE 52
HOPEWELL JUNCTION, NY 12533

XII. TRANSPORTATION SERVICES USED

N/A

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)		D. Amount of Waste	E. Unit of Measure
	1	SOLIDS CONTAMINATED WITH CORROSIVES	08	D002		300000	P
	2	SOLIDS CONTAMINATED WITH SOLVENTS	09	F001 F003	F002 F004	40000	P
	3			F005			
	4	SOLIDS CONTAMINATED WITH METHANOL/MIBK	09	D001		16000	P
	5	WASTE METHANOL/MIBK SOLUTION	08	D001		25200	P
	6	RESIST AND SOLVENTS	08	F001 F003	F002 F004	21600	P
	7			F005			
	8	J-100 LIQUID	02	F001 F003	F002	40000	P
	9	J-100 CONTAMINATED SOLIDS	02	F001 F003	F002	80000	P
	10	J-100 EMPTY BOTTLES	02	F001 F003	F002	14400	P
	11	ARSENIC & QUARTZ	18	D004		11200	P
	12						

XIV. COMMENTS (enter information by section number—see instructions)

- ON-SITE STORAGE
- STORAGE OF WASTES DESTINED FOR PRECIOUS METALS RECOVERY STORED < 90 DAYS

IBM-EF- 60

IBM-EF- 60

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont'd)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G N Y D 0 0 0 7 0 7 9 0 1 T/A C 1

(1 2 ... 13 14 15)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

IBM EAST FISHKILL

X. FACILITY'S EPA I.D. NO.

F N Y D 0 0 0 7 0 7 9 0 1

(16 ... 28)

XI. FACILITY ADDRESS

ROUTE 52
HOPEWELL JUNCTION, NY 12533

XII. TRANSPORTATION SERVICES USED

N/A

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)		D. Amount of Waste	E. Unit of Measure
29-32	1	WATER & CARBON RESIDUE	15 (33 34)	D002 (35 38)	D008 (39 42)	37600 (51 59)	P (60)
	2	WASTE CAUSTIC DRUMS	02	D002		1100	P
	3	WASTE ACID DRUMS	02	D002		2000	P
	4	WASTE ACID ETCH DRUMS	02	D002		3500	P
	5	EPOXY & SOLVENTS	08	F001 F003	F002 F004	5400	P
	6			F005			
	7	CYANIDE	18	D003		32400	P
	8	MOLY PASTE JARS	15	F001 F003	F002 F004	15000	P
	9			F005			
	10	WASTE ISOPROPANOL	08	D001		25000	P
	11	WASTE PERCHLOROETHYLENE	15	F001		25000	P
	12	WASTE FREON	15	F001		25000	P

XIV. COMMENTS (enter information by section number—see instructions)

ON-SITE STORAGE

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G N Y D 0 0 0 7 0 7 9 0 1 T/A C 1

(1 2 ... 13 14 15)

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

IBM EAST FISHKILL

X. FACILITY'S EPA I.D. NO.

F N Y D 0 0 0 7 0 7 9 0 1

(16 ... 28)

XI. FACILITY ADDRESS

ROUTE 52
HOPEWELL JUNCTION, NY 12533

XII. TRANSPORTATION SERVICES USED

N/A

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
	1	WASTE N-BUTYL ACETATE		D001	25000	P
	2	WASTE METHYLENE CHLORIDE		F002	25000	P
	3	MISC. LAB PACK CHEMICALS	15	D001 D002 D003 D004	11250	P
	4		18	D007 D008 D009 F001		
	5		08			
	6		16			
	7		02			
	8		09			
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

ON-SITE STORAGE

IBM EAST FISHKILL 009

IBM EAST FISHKILL 009

PRELIMINARY ASSESSMENT
OFF SITE RECONNAISSANCE
INFORMATION REPORTING FORM

Date: 10-23-87

Site Name: IBM TDD: 02-8710-09

Site Address: Rt. 52
Street, Box, etc.

E. Fishkill
Town

Dutchess
County

N.Y.
State

NUS Personnel:

Name	Discipline
Beth Torpey	Environmental Scientist
Dan DeBruyn	chemist

Weather Conditions (clear, cloudy, rain, snow, etc.):

Estimated wind direction and wind speed:

Estimated temperature:

Signature: Beth Torpey Date: 10-23-87

Countersigned: Dan DeBruyn Date: 10-23-87

PRELIMINARY ASSESSMENT

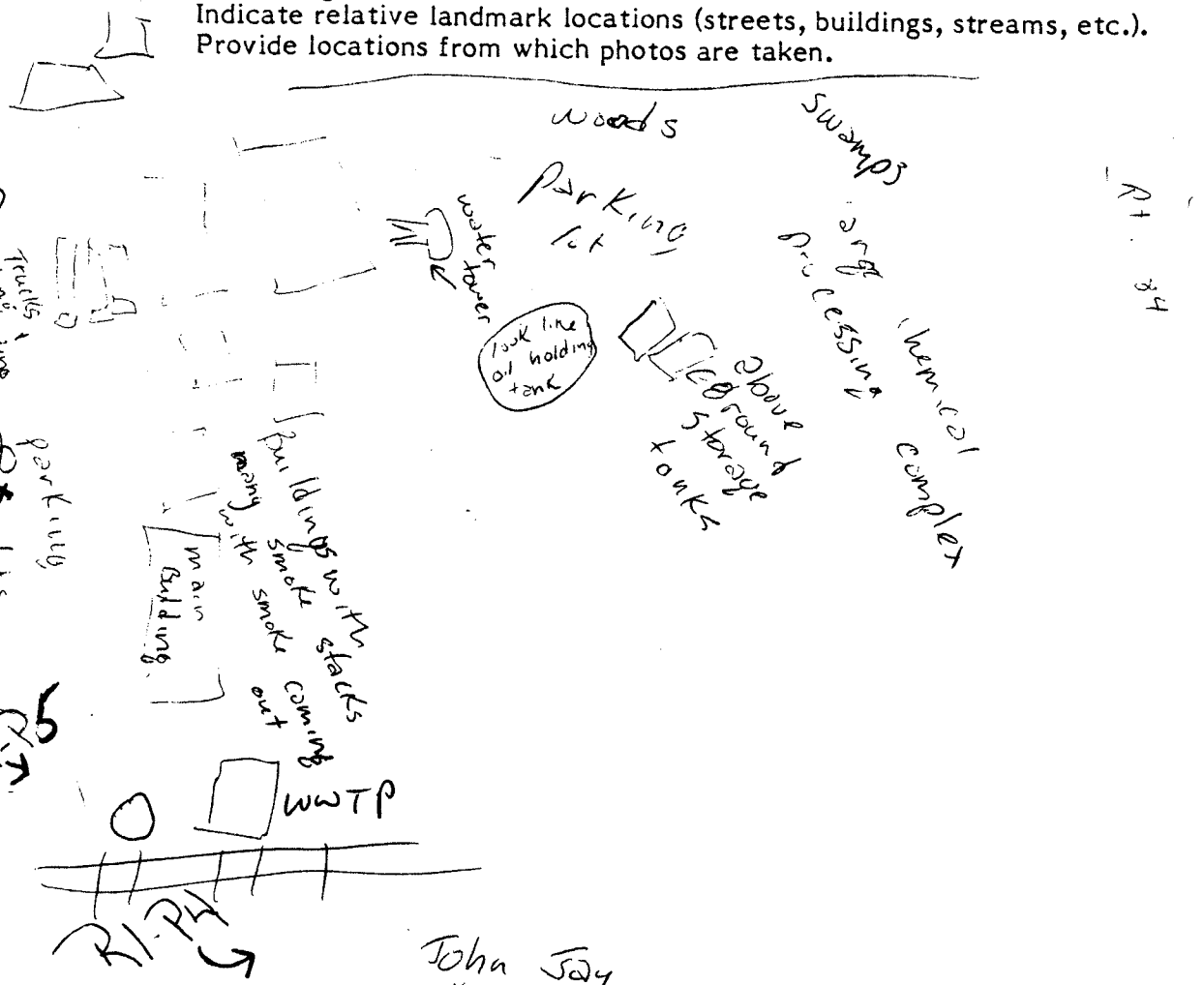
INFORMATION REPORTING FORM

Date: 10-23-87

Site Name: IBM TDD: 02-8710-09

Site Sketch: Woods 27→75

Indicate relative landmark locations (streets, buildings, streams, etc.).
Provide locations from which photos are taken.



Signature: Beth Torpey Date: 10-23-87

Countersigned: [signature] Date: 10-23-87

PRELIMINARY ASSESSMENT

INFORMATION REPORTING FORM

Date: 10-23-87

Site Name: IBM TDD: 02-8710-09

Notes (Periodically indicate time of entries in military time):

This is a huge facility. It looks as if there is one big building for administration + the rest are for chemical processing. There are many smokestacks operating. There is an on-site water treatment plant + a truck loading + unloading facility that also has cleaning functions. There are gates at every entrance but the facility does not seem to be entirely fenced. The northern boundry (on the other side of 52) are houses. The east boundry is wooded with some swamp land. The south is bordered by rt. 84. The the west are railroad tracks + John Jay high school. The facility slope appears to be even. Storm drains in the parking lot

Signature: Beth Torpey Date: 10-23-87

Countersignature: [signature] Date: 10-23-87

PRELIMINARY ASSESSMENT

INFORMATION REPORTING FORM

Date: _____

Site Name: _____ TDD: _____

Notes (Cont'd):

_____

_____

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_____

Attach additional sheets if necessary. Provide site name, TDD number, signature, and countersignature on each.

Signature: _____ Date: _____

Countersignature: _____ Date: _____

PRELIMINARY ASSESSMENT

INFORMATION REPORTING FORM

Date: 10-23-87

Site Name: IBM TDD: 02-8710-09

Photolog:

Frame/Photo Number	Date	Time	Photographer	Description
R1-P3	10.23	10:55	DDB	Containers truck loading Area
R1-P4	10:23	10:59	DDB	Waste Water treatment plant
R1-P5	10:23	11:05	DDB	Waste Water treatment plant
R1-P6	10:23	11:06	DDB	Mid Section for IBM complex

Attach additional sheets if necessary. Provide site name, TDD number, signature, and countersignature on each.

Signature: Beth Torpey Date: 10-23-87

Countersignature: Donald Bruno Date: 10-23-87

International Business Machines Corporation

East Fishkill Facility, Route 52
Hopewell Junction, New York 12533-0999
914/894-2121

D/50H, B/300, Z/45X

July 25, 1984

Regional Administrator
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, NY 10278

Attn.: Permits Administration Branch

Sub. : RCRA PERMIT QUARTERLY REPORT

Gentlemen:

This letter is to serve as the quarterly report of incidents for the IBM East Fishkill Facility located at Route 52, Hopewell Junction, New York 12533 (EPA ID No. NYD000707901) for the period April-June, 1984. Following is a summary of two events determined to be reportable under the standard permit conditions listed in Module I, condition D.18 of our permit.

On the morning of April 3, 1984, an estimated 15-50 gallons of sludge spilled at our Fluoride/Heavy Metals Treatment Plant onto a paved surface. The spill occurred during transfer operations from a clarifier to a tanker truck. When the discharge end of the hose was lowered from the tanker, residual material was released. Caps have been purchased for the transfer hose to eliminate future spillages. There was no known release to the surface waters. Sorbents used to clean the paved surface were disposed in a secure landfill with our fluoride wastewater filter cake, and an estimated 1500 gallons of flushwater from the storm drain was treated on-site. The incident was reported to NYSDEC and the National Response Center.

On June 22, 1984, a fluoride wastewater drain line containing sulfuric acid and ammonium persulfate was discovered to be leaking through a trench inside B/320. A total of 35 gallons of wastewater is estimated to have been released to the ground. Approximately 60 drums of contaminated soil were excavated for disposal at a secure landfill. The drain has been temporarily rerouted above the floor. A new trench is being designed, and construction is expected to be completed by 8/84. The incident was reported to NYSDEC and the National Response Center.

C7SCD194/jms

We do not believe that there are any health or significant long term environmental impacts associated with either of these incidents.

I certify under penalty of law that this document was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to be the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Please contact J. M. Hogan on (914) 894-9273 if you have any questions or require further information.

Sincerely,

International Business
Machines Corporation

H. K. Fridrich
General Manager,
East Fishkill

jms

c NYSDEC, Bureau of Hazardous Waste Technology

C7SCD194/jms

International Business Machines Corporation

East Fishkill Facility, Route 52
Hopewell Junction, New York 12533
914/897-2121
Attn.: H. K. Fridrich
D/50H, B/300, Z/45X

January 25, 1985

Regional Administrator
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, NY 10278

Attn.: Permits Administration Branch

Sub. : RCRA PERMIT QUARTERLY REPORT

Gentlemen:

This letter is to serve as the quarterly report of incidents for the IBM East Fishkill Facility located at Route 52, Hopewell Junction, New York 12533 (EPA ID No. NYD000707901) for the period October-December, 1984. Following is a summary of an incident felt to be reportable under the standard permit conditions listed in Module I, condition D.18 of our permit.

During investigations into a hydrogen sulfide odor in the basement of B/323, site personnel sampled accumulated liquids in nearby storm drains, manholes, and sumps. The results of these efforts, summarized in Table I, indicated a problem originating in the B/323 north groundwater sump. The north groundwater sump was designed to collect both high groundwater conditions and storm water from the B/323 loading dock and discharge this to the storm drain system. The storm drain influent to the sump has been blocked since discovery of this incident and the discharge pumps have been tagged out-of-service. Procedures were initiated to pump the sumpwater to tank trucks while flushing the building underdrain system. The flushing operations have been discontinued, as this was felt only to be diluting the material removed. The sump is now being allowed to recharge naturally, and pumping operations will be continued until acceptable concentrations are present in the sumpwater.

The sumpwater is currently being disposed off-site at SCA Chemical Services in Model City, NY. When the concentrations of organics and the volume of sumpwater removed per day are at a level such that no increase

Z1SCD017/jms

in final effluent concentration would be expected (1 ppb ±), we propose to introduce the sumpwater to our industrial wastewater treatment facility. Dependent on the time period required to achieve these conditions, the possibility of on-site treatment prior to discharge to the industrial wastewater treatment facility or surface water may be explored.

Large deposits of clayey soil were encountered in the construction of B/323. It is felt that this underlying soil will assist in minimizing any migration of contaminants out of the building underdrain system. Eventually, all affected groundwater under the building should flow to the groundwater sumps. Historically, the groundwater monitoring wells in the vicinity of the building have not indicated any contamination.

The source of the organics detected in the groundwater sump is believed to be associated with construction activities in the B/323 basement. It is theorized that material was inadvertently spilled and entered the sump. A program to insure the sump cover is kept on the sump has been initiated to insure limited access.

An audit of the B/323 basement revealed the use of several types of chemicals. These included acetone, isopropyl alcohol, epoxies, paint thinners, etc. which were used for installation of the floor coating and piping.

Notification calls were made to NYSDEC (J. Sansalone; 12/4/84), the National Response Center (12/4/84; Report #041649), and the U.S. EPA Region II Response Center (12/4/84).

A representative of the U.S. EPA Region II Response Center toured the area on December 5, 1984. He indicated that the situation was under control and remedial actions were satisfactory. A NYSDEC representative was on-site December 11, 1984.

It is believed the measures outlined in this letter represent a reasonable and effective way of containing affected groundwater and cleaning up the pollutants present.

I certify under penalty of law that this document was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to be the best of my knowledge

Z1SCD017/jms

and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment of knowing violations.

Please contact J. M. Hogan on (914) 894-9273 if you have any questions or require further information.

Sincerely,

International Business
Machines Corporation

H. K. Fridrich
General Manager,
East Fishkill

jms

Enclosure

c NYSDEC, Bureau of Hazardous Waste Technology

Z1SCD017/jms

bc S. C. Danskin Z/872
A. H. Reagin Z/45A
Dept. 92D Files Z/872

Z1SCD017/jms

TABLE I
SUMMARY OF ANALYSES (UNITS - MG/L)

Sample Date	Location	H_2S	Methylene Chloride	CIS-1,2 Di-chloro-ethylene	Freon TF	Acetone	Trichloro-ethylene	Perchloro ethylene	Toluene /NBA	Di-chloro-ethane	Isopropyl Alcohol	Xylene	Fe	Mn
11/16/84	North Groundwater Sump	-	-	< 1.0	-	< 1.0	-	< 1.0	-	-	-	-	0.13	0.75
11/19/84	Storm Drain	-	2.3[a]	< 1.0	1.0	-	-	-	-	-	-	-	1.82	4.3
11/20/84	Electric Manhole (CS 1372)	-	< 1.0	-	-	< 1.0	-	-	1.0	-	-	-	-	-
11/20/84	North Groundwater Sump	-	-	< 1.0	-	< 1.0	< 1.0	-	-	< 1.0	< 1.0	-	0.2	3.61
11/28/84 -5:30 pm	North Groundwater Sump	-	-	< 1.0	-	~50	-	-	-	-	< 1.0	-	-	-
11/28/84 10:45 pm	Influent to North Groundwater Sump	-	-	< 1.0	-	60.2	-	-	-	-	16.1	-	-	-
11/29/84	North Groundwater Sump	-	-	< 1.0	-	61.0	-	-	-	-	11.0	-	-	-
11/30/84	North Groundwater Sump	-	-	< 1.0	-	142.4	-	-	-	-	89.3	-	-	-
12/5/84	North Groundwater Sump	25	-	< 1.0	-	40	-	-	-	-	15	-	-	-
12/7/84	North Groundwater	-	-	< 1.0	-	169	-	-	-	-	23	-	-	-
12/8/84	North Groundwater Sump	-	-	1.0	-	282	< 1.0	< 1.0	1.0	-	26.6	< 1.0	-	-
12/9/84	North Groundwater Sump	-	-	1.1	-	119	-	< 1.0	1.0	-	17	-	-	-

[a]Initially identified as methylene chloride, later determined substance was actually acetone.

V5SCD347/jms

TABLE I CONT'D
SUMMARY OF ANALYSES (UNITS - MG/L)

Sample Date	Location	H_2S	Methylene Chloride	CIS-1,2 Di-chloro-ethylene	Freon TF	Acetone	Trichloro-ethylene	Perchloro ethylene	Toluene /NBA	Di-chloro-ethane	Isopropyl Alcohol	Xylene	Fe	Mn
12/14/84	North Groundwater Sump	5.0	-	< 1.0	-	176	-	-	< 1.0	-	20.1	-	< 0.1	5.5
12/17/84	North Groundwater Sump	5.0	-	< 1.0	-	117	-	-	-	-	47.4	-	< 0.1	5.7
12/20/84	North Groundwater Sump	40.1	-	< 1.0	-	209	-	< 1.0	< 1.0	-	57	-	< 0.1	5
12/21/84	North Groundwater Sump	20	-	< 1.0	-	197.7	-	< 1.0	< 1.0	-	55	-	< 0.1	0.4
12/27/84	North Groundwater Sump	< .1	-	< 1.0	-	432	-	-	-	-	115	-	< 0.1	5.7
1/2/85	North Groundwater Sump	-	-	< 1.0	-	14.6	-	-	-	-	33.0	-	< 0.1	4.64
1/7/85	North Groundwater Sump	3.5	-	< 1.0	-	38.6	-	-	-	-	32.9	-	< 0.1	3.8
1/8/85	North Groundwater Sump	3.5	-	< 1.0	-	25.5	-	-	-	-	33.4	-	< 0.1	0.87
1/10/85	North Groundwater Sump	100	-	< 1.0	-	43.3	-	-	-	-	49.0	-	-	

V5SCD347/jms

TABLE

EAST FISHKILL, ID #NYD000707901

1. USGS Map
2. Drawing - Location of water intake wells
3. Drawing - Location of hazardous waste storage and treatment facilities
4. Photographs:
   - One for Fluoride/Heavy Metals Treatment Plant
   - One for Industrial Wastewater Treatment Plant
   - Five for Individual Equipment in Fluoride/Heavy Metals Treatment Plant
   - One Drum Storage area containing wastes
   - One Empty Drum Storage area

MERRITT BROOKLANDS, INC., ID #NYD000707893

1. USGS Map

INVESTORS FUNDING CORP., ID #NYD000824490

1. USGS Map
2. Drawing - Location of water intake wells

International Business Machines Corporation

East Fishkill Facility, Route 52
Hopewell Junction, New York 12533-0999
914/894-2121

Attn.: H. K. Fridrich
D/50H, B/300, Z/45X

April 29, 1985

Regional Administrator
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, NY 10278

R 880

Attn.: Permits Administration Branch

Sub. : RCRA PERMIT QUARTERLY REPORT

Gentlemen:

This letter is to serve as the quarterly report of incidents for the IBM East Fishkill Facility located at Route 52, Hopewell Junction, NY 12533 (EPA ID No. NYD000707901) for the period January - March, 1985. Following is a summary of an incident reportable under the standard permit conditions listed in Module I, condition D. 18 of our permit.

On January 21, 1985 at approximately 5:00 AM, an estimated 100 gallons of waste solvent overflowed from Storage Tank #157 at Building 320 thru the tank vent. Liquid spilled was primarily isopropyl alcohol. Based on analyses of the storm drain system, there was no indication of any discharge to surface waters.

The incident was caused by the opening of pressure relief valves in a virgin solvent supply system. This allowed virgin solvent to flow to the tank in a relatively large volume. As a remedial action, the normal pressure in the solvent supply line has been reset to a level significantly lower than the activation level of the pressure relief valve.

The contaminated soil associated with this incident was excavated for disposal at a secure landfill. There were no injuries associated with the incident.

The incident was reported to the New York State Department of Transportation Spill Response Center (518/457-7362; #842807) and The National Response Center (800/424-8802; #211452MUL-NY) on January 21, 1985.

PP6SD105/jms

I certify under penalty of law that this document was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to be the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment of knowing violations.

Please contact J. M. Hogan on (914) 894-9273 if you have any questions or require further information.

Sincerely,

International Business
Machines Corporation

H. K. Fridrich
General Manager,
East Fishkill

jms

Enclosure

c NYSDEC, Bureau of Hazardous Waste Technology

PP6SD105/jms

47-15-14(1/85)

INSPECTION FORM

REGION: 3
Major: X
Non-Major: ____

NEW YORK STATE
INDUSTRIAL HAZARDOUS WASTE MANAGEMENT ACT
(Chapter 639, Laws of 1978)

Prepared for:

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Henry G. Williams, Commissioner

Division of Solid and Hazardous Waste
Norman H. Nosenchuck, Director

Send to: Compliance Inspection Section
50 Wolf Road - Room 207/415
Albany, New York 12233-0001

RECEIVED
MAR 28 1985
BUREAU OF HAZARDOUS WASTE OPERATIONS
DIVISION OF SOLID AND HAZARDOUS WASTE

EPA I.D. NUMBER: NYD000707901

* HANDLER'S NAME (Corporate): International Business Machines (IBM)
(Division): ____

* HANDLER'S MAILING ADDRESS: Route 52

City & State Hopewell Junction, N.Y. Zip Code 12533

*HANDLER'S LOCATION ADDRESS: (if different than mailing) ____

City & State ____, ____ Zip Code ____

* HANDLER'S TELEPHONE NUMBER: (914) 894-7707 Extension ____

*FULL NAME OF HANDLER'S CONTACT: (Mr.) ~~(Ms.)~~ James Mullen

*TITLE OF HANDLER'S CONTACT: ____

*HANDLER'S CONTACT ADDRESS: (if different than Handler's) Route 52 Internal Zip code 872

City & State Hopewell Junction, N.Y. Zip Code 12533

* HANDLER'S CONTACT TELEPHONE NUMBER: (914) 894-7707 Extension ____
(if different than Handler's)

INSPECTION DATE: 3/22/85 TIME OF INSPECTION: 10:00 (a.m.) p.m.

COUNTY: Dutchess E/A NUMBER: __ __ __ __ __ __

INSPECTOR'S NAME: Aida M. Vazquez

TITLE: Assistant Sanitary Engineer

NAME: Robert Dumin

TITLE: Principal Engineering Technician

CHECK ONE: Copy of THIS report (___ has) (X has not) been given to the Handler.

REPORT PREPARED BY: Aida M. Vazquez DATE: ____

REPORT APPROVED BY: ____ DATE: ____

TABLE OF CONTENTS

* For the purpose of this Inspection Report - HANDLER means a hazardous waste Generator, Transporter, or Treatment, Storage or Disposal Facility (TSDF).

47-15-14(9/86)

REGION: 3
Major:
Major TSDF: X
Non-Major:
Substitution:

INSPECTION FORM

NEW YORK STATE INDUSTRIAL HAZARDOUS WASTE MANAGEMENT ACT

Chapter 639, Laws of 1978

Prepared for:

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Henry G. Williams, Commissioner

Division of Solid and Hazardous Waste
Norman H. Nosenchuck, Director

Send to: Compliance Inspection Section
50 Wolf Road - Room 209/415
Albany, New York 12233-0001

EPA I.D. NUMBER: NY D 000 707 901

*HANDLER'S NAME (Corporate): International Business Machines

(Division):

*HANDLER'S MAILING ADDRESS: East Fishkill Rt. 52
Dept. 120 ZIP 9A1

City, State & Zip Code

*HANDLER'S LOCATION ADDRESS: (if different than mailing)

City, State & Zip Code

*HANDLER'S TELEPHONE NUMBER: (914) 892-1560 Extension:

*FULL NAME OF HANDLER'S CONTACT: (Mr.) (Ms.) James Mullen

X *SIGNATURE OF HANDLER'S CONTACT:
(This signature is not an admittance to any violations cited herein. It merely acknowledges that an inspection took place.)

*TITLE OF HANDLER'S CONTACT: Manager of Site Env. Engineering

INSPECTION DATE: 2 / 3 / 19 87 TIME OF INSPECTION: (a.m.) (p.m.)

INSPECTOR'S SIGNATURE: William A. Buckley

COUNTY: Dutchess E/A NUMBER: __ __ : __ __

INSPECTOR'S NAME: William A Buskey

TITLE: Principal Engineering Tech 5 4-21

NAME:

TITLE:

CHECK ONE: Copy of THIS report (___ has) (X has not) been given to the Handler.

REPORT PREPARED BY: William Buckley DATE: 2/5/87

REPORT APPROVED BY: Linda M. Vaynier DATE: 2/5/87

TABLE OF CONTENTS

APPENDICES

(Need Not Attach If Not Required - Circle Attached Appendices)

* For the purpose of this Inspection Report - HANDLER means a hazardous waste Generator, Transporter, Treatment, Storage or Disposal Facility (TSDF).

New York State Department of Environmental Conservation
Division of Solid and Hazardous Waste
50 Wolf Road, Albany, New York 12233

PART I

General Information and Classification of Facility

1. Identification of Hazardous Waste - 371 — Yes: X — No: ___

A. Is there reason to believe the facility has hazardous waste on-site? If yes, what leads you to believe it is hazardous waste? Check appropriate box/boxes and attach any applicable correspondence with DEC or EPA:

(1) X Company recognizes that its waste is hazardous during the inspection.

(2) X Company admitted the waste is hazardous in its RCRA notification and/or Part A permit application.

(3) X Testing has shown characteristics of:
(✓) ignitability - 371.3(b);
(✓) corrosivity - 371.3(c);
(✓) reactivity - 371.3(d);
(✓) EP toxicity - 371.3(e)

___ Has revealed hazardous constituents (please attach analysis report) 371.4(a)(2), Appendix 22, Appendix 23

(4) X The material is listed in the regulations as a hazardous waste from non-specific sources 371.4(b).

(5) X The waste material is listed in the regulations as a hazardous waste from specific sources. 371.4(c).

(6) ___ The material or product is listed in the regulations as discarded commercial chemical products, off-specification species, container residues and spill residues thereof. 371.4(d).

(7) ___ Company is unsure, but they have reason to believe that waste materials are hazardous. (Explain) _____

_____

_____

_____

_____

B. Is there reason, other than those above, for you to believe that there is hazardous waste on site? (Explain) NO

C. What other environmental permits are held by the company, relative to hazardous waste management?

X SPDES Permit Number X Air Permit Number

NA Part 364 Industrial Waste Transporter Permit (indicate this company's permit number if any)

Please describe other relavent (if any) permits and give the name, address, Part 364 Permit Number and EPA I.D. Number of transporter(s) used by company.

S&J Transportation NJD071629976, Cecos Int. NYD080336241

L.P.M. CTD981069099, Chem. Freight OHD075-006304

E.T. Group NJD000692061, Freehold Cartage NJD054126164

Vanguard NJD990753493

D. If the facility is a treatment, storage or disposal facility, have they:

X Submitted a Part A application. ____ Have changes been made that are not reflected in the Part A application? Should the Part A be modified by the Company? ____ If so, explain.

X Submitted a Part B application.

____ Been granted a Part 373 permit.

If so, when does it expire: _____
Please attach or explain any special conditions or variances - 373-1.1(e)

X Been granted a hazardous waste Part B permit.

If so, also complete Appendix M.

E. Describe the activities that result in the generation of hazardous waste. Include the company's manufacturing processes.

The major hazardous waste generating operations include etching, cleaning and polishing of semi-conductors. The primary hazardous waste are metals, flouride compounds solvents, cyanides and other inorganic and organic chemicals which are subject to RCRA.

F. Identify the hazardous wastes that are on-site and the quantity of each (use the identification numbers referred to in Part 371).

45 - 55 gallon drums waste solvent (F003)
46 - 55 gallon drums spent cyanide plating bath solutions (F007)
13 - 55 gallon drums corrosive waste (D002)
7 - 55 gallon drums of tetrachloroethylene containing waste (F001)
24,846 gallons mixed waste solvents (F001, F002, F003, F005)
6,589 gallons Waste Isopropyl Alcohol (D001)
6,101 gallons N-Butyl Acetate (D001)
2,240 gallons Freon TF (F002)
157 gallons Methylene chloride (F002)

G. The handler notified EPA as a:

Gen-TSD

Has EPA or DEC officially modified the handlers status? If so, attach correspondence. NO

2. Status Identification:

This handler should be inspected as a (check each appropriate category after considering exemptions)

A. NA Transporter - complete Appendix B

B. Generator Status Identification 372.1

1. NA Category 1 generator - small quantity generator - generates less than 100 kg/mo and stores less than 100 kg. - 372.1(e)(1)(vii)(a) Complete Part II, 1A.

2. ___ Category 2 generator - small quantity generator - generates less than 100 kg/mo and stores more than 100 kg but less than 1,000 kg. - 372.1(e)(1)(vii)(b) - Complete Part II, 1B.

3. ___ Category 3 generator - small quantity generator - generates more than 100 kg/mo but less than 1,000 kg/mo and stores less than 1,000 kg. - 372.1(e)(1)(viii) - Complete Part II, 1B and 1C.

4. X Category 5 generator - generated 1,000 kilograms or more per month or generated acute hazardous waste in quantities greater than those specified in Part 372.1(e)(1)(v). Complete Part II. Generators over sole source aquifers also complete Appendix A.

5. X Category 6 generator - stores 1,000 kilograms or more or stores acute hazardous waste in quantities greater than those specified in Part 372.1(e)(1)(v). Complete Part II. Generators over sole source aquifers also complete Appendix A.

C. Treatment, Storage or Disposal Facility Status

If yes, complete Appendix A and other appropriate Appendices.

1. Is hazardous waste generated and stored on-site? If so:

(a) YES Has hazardous waste been stored on-site longer than 90 days? 373-1.1(d)(1)(iii)

(b) YES Has more than 8,800 gallons of hazardous waste been stored in containers? 373-1.1(d)(iii)(a)

(c) YES Has more than 20,000 gallons of hazardous waste been stored in tanks? 373-1.1(d)(iii)(b)

2. Yes Hazardous waste received from off-site and not beneficially used, reused or legitimately recycled or stored.

3. Yes Hazardous waste is treated on-site. Exempt Treatment

4. N/C Hazardous waste is disposed of on-site.

3. Exemptions

A.- Generator Exemptions

(1) N/A Not a regulated handler (be sure to indicate why in Part I 1F and 1G and/or in appropriate exemption below - for example the company notified for precautionary reasons or the waste generated is not hazardous as specified in 371.1(e)(2).

(2) Delisted hazardous waste. IDENTIFY the waste that was delisted: (If the company is in the delisting process they are still regulated until their delisting petition is favorably approved) Complete appropriate parts depending on company status.

_____

_____

(3) Exemption for used engine lubricating oil. 372.1(e)(8) -

(4) Exemption for publicly owned treatment works 372.1(e)(4).

(5) Samples collected for testing. 372.1(e)(5).

(6) Residues of hazardous waste in empty containers. 372.1(e)(6).

(7) A hazardous waste which is generated in a product or raw material storage tank, a product or raw material transport vehicle or vessel, a product or raw material pipeline, or in a manufacturing process unit or an associated non-waste treatment manufacturing unit is not subject to regulation until it exits the unit in which it was generated, unless the unit is a surface impoundment, or unless the hazardous waste remains in the unit more than 90 days after the unit ceases to be operated for manufacturing, or for storage or transportation of product or raw materials. 372.1(e)(7).

B. TSD Exemptions

1. TSD exemptions - 373-1.1(d)(1) (for facilities and operations that manage hazardous waste other than waste oil)

(a) ___ Storage of hazardous wastes indicated in 373-1.1(d)(4) prior to its beneficial use or reuse or legitimate recycling or reclamation. 373-1.1(d)(1)(vi). If yes, complete Part II, Questions 3, 5, 6, 7.

(b) ___ Beneficial use or reuse or legitmate recycling or reclamation of a characteristic hazardous waste not identified in 373-1.1(d)(5) other than sludge. (373-1.1(d)(1)(vii)). Complete manifest questions.

(c) ___ Beneficial use or reuse or legitimate recycling or reclamation of a listed hazardous waste or hazardous waste sludge other than at commercial facilities. Units utilized for precious metal recovery at commercial facilities are exempt. Recyclable materials listed in 373-1.1(d)(5) are not exempt. Any off-site facility must have an EPA identification number. (373-1.1(d)(1)(viii)) Complete manifest questions.

(d) ___ The treatment of characteristic hazardous waste other than sludge prior to its beneficial use or reuse or legitimate recycling or reclamation. Recyclable materials listed in 373-1.1(d)(5) are not exempt. 373-1.1(d)(1)(ix). Complete manifest questions.

(e) ___ The treatment of a listed hazardous waste or hazardous waste sludge prior to its beneficial use or reuse or legitimate recycling or reclamation other than at commercial facilities. Units utilized for precious metal recovery at commercial facilities are exempt. Any off-site facility must have an EPA identification number and comply with manifesting requirements. Recyclable materials listed in 373-1.1(d)(5) are not exempt. (373-1.1(d)(1)(x))

(f) ___ Totally enclosed treatment facility (373-1.1(d)(1)(xi))

(g) X Elementary neutralization units or wastewater treatment units other than units located at commercial facilities. Units utilized for precious metal recovery at commercial facilities are exempt. If yes, complete Part II, 3. (373-1.1(d)(1)(xii))

(h) ___ A wastewater treatment facility holding a SPDES Permit for a surface water point source discharge that reuses spent pickle liquor or facilities that accumulate, store or physically, chemically or biologically treat spent pickle liquor prior to reuse in a wastewater treatment facility. (373-1.1(d)(1)(xvi))

2. TSD exemptions - 373.1.1 (d)(2) (for facilities and operations that manage waste oils)

(a) ____ Storage or treatment of waste oil generated on-site prior to its beneficial use or reuse or legitimate recycling or reclamation if the waste oil is not a listed hazardous waste, and the waste oil is not a hazardous sludge. 373-1.1(d)(2)(ii). If yes, complete Part II: 3, 5, 6, 7.

(b) ____ Exemptions for storage of waste oil at an energy recovery facility prior to its on-site combustion of such waste oils are not listed hazardous wastes, waste oils are not hazardous sludges, and the facility stored less than 80,000 gallons of waste oil. 373-1.1(d)(2)(iii). If yes, complete Part II: 3, 5, 6, 7.

(c) ____ Combustion units that recover energy from waste oil, other than listed hazardous waste and sludges and the related treatment on-site of such combustion units.

3. TSD exemptions - (for facilities and operations that manage hazardous waste or waste oils).

(a) ____ Storage of hazardous waste generated and stored on-site for 90 days or less and 8,800 gallons or less is stored in containers or 20,000 gallons or less is stored in tanks. The facility cannot be located in a geographical area overlying a sole source aquifer. If yes, complete Part II. 373-1.1(d)(1)(iii).

(b) ____ Storage or treatment of hazardous waste on-site of generation if generated and stored less than 1,000 kilograms of hazardous waste in each calendar month and do not generate or store acute hazardous waste as described in 373-1.1(d)(1)(i)(b). 373-1.1(d)(1)(v).

(c) ____ Treatment or containment activities during an immediate response 373-1.1(d)(1)(xiii).

(d) ____ Accumulation areas. If yes, complete Part II: 3C, questions 1-5. 373-1.1(d)(1)(xiv).

(e) ____ Storage of manifested shipments of hazardous waste in containers or vehicles by a transporter at its own transfer facility for 5 days or less. If yes, complete Appendix B: 3. 373-1.1(d)(1)(xv).

4. Environmental Facilities Corporation (EFC) Survey

The following questions are voluntary:

The Environmental Facilities Corporation (EFC) is actively involved in the industrial materials recycling program, and these questions will assist EFC in carrying out this program. It may also be beneficial to the facility being inspected in that acceptable markets or more economical alternatives to the facility's current disposal techniques may be brought to their attention.

A. Does the company believe their hazardous waste has the potential for recovery, reclamation or exchange with other companies to minimize disposal costs? X Yes ___No ___Don't Know

If yes:

B. Does the company wish to list their waste stream in the Northeast Industrial Waste Exchange Listings Catalog? X Yes ___No ___Don't Know

C. Does the company want to receive additional information about the potential for waste exchange? ___Yes X No ___Don't Know

D. Does the company wish to obtain assistance from the New York State Environmental Facilities Corporation to assess the potential for recovery, reclamation or exchange of the hazardous waste stream? ___Yes X No ___Don't Know

The Company representative may wish to contact Mr. Pickett Simpson, Hazardous Waste Program Manager, Environmental Facilities Corporation, 50 Wolf Road, Room 527, Albany, New York 12233 at (518) 457-4138.

Currently working with the EFC

New York State Department of Environmental Conservation
Division of Solid and Hazardous Waste
Bureau of Hazardous Waste Operations
50 Wolf Road, Albany, New York 12233

Part II

Generator Inspection Section

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

Refer to questions based upon category checked in Part I.

1. Requirements for Category 1-3 Generators:

A. If Category 1, the generator has:

____ disposed of hazardous waste in a solid waste facility - 372.1(e)(1)((vii)(a)(2) NA

____ made a hazardous waste determination - 372.1(e)(1)(vii)(a)(1) ____

B. If Category 2 or 3, the generator has met the following:

____ made a hazardous waste determination - 372.1(e)(1)(vii)(b)(1) ____

____ disposed of in authorized hazardous waste facility - 372.1(e)(1)(vii)(b)(2) ____

____ used appropriate containers; properly packaged, labeled and marked during storage and shipment - 372.1(e)(1)(vii)(b)(4) ____

____ had containers and tanks stored properly; not open, not handled or stored in a way which may cause it to leak; inspected at least quarterly - 372.1(e)(1)(vii)(b)(5) ____

____ had tanks designed, constructed and operated in accordance with regulations - 372.1(e)(1)(vii)(b)(6) ____

____ had tanks properly sheltered and protected-372.1(e)(1)(vii)(b)(7) ____

C. If Category 3 generator, has:

____ annual report prepared and sent to DEC - 372.1(e)(1)(viii)(f) ____

____ obtained an EPA Identification Number - 372.1(e)(1)(viii)(b) ____

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

For Category 5 and 6 generators complete remainder of Part II.

2. General Requirement

A. ____ The generator has made a determination as to whether or not his solid waste is a hazardous waste - 372.2(a)(2) X

3. On-site accumulation of hazardous waste prior to shipment

A. ____ All such wastes are shipped off-site to an authorized treatment, storage or disposal (TSD) facility in 90 days or less. 372.2(a)(8)(ii) NA

B. ____ The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container or tank 372.2(a)(8)(ii) NA

C. Standards for management of containers - 372.2(a)(8)(ii); 373-3.9
(This section will also be completed for TSD's as referred to from Appendix A.)

1. What type of containers are used for accumulation? Describe the size, type. (e.g., 12 fifty-five gallon drums of waste acetone).

55 gallon steel drums, some plastic lined

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

2. ___ Each container is marked with the words "Hazardous Waste." 372.2(a)(8): 373-1.1(d)(1)(iii) X

3. X The containers appear to be in good condition and are not in danger of leaking. (If containers are leaking, describe the type, condition and number that are leaking or corroded. Be detailed and specific) - 373-3.9(b) ___

Several Containers were severely dented. They were not leaking but their structural integrity was impaired.

4. ___ Hazardous waste is stored in containers made of compatible materials 373-3.9(c) (If not, please explain). X

5. ___ All containers except those in use are closed - 373-3.9(d)(1) X

6. ___ Containers holding hazardous waste must not be opened, handled or stored in a manner which may rupture the container or cause it to leak - 373-3.9(d)(2) X

7. ___ The storage area is inspected at least weekly - 373-3.9(e) X

8. The generator complies with the following special requirements related to storage of ignitable, or reactive wastes 373-3.9(f):

(a) ___ Containers holding ignitable or reactive waste are located at least 15 meters (50 feet) from the facility property line. 373-3.9(f) X

(b) ___ Generator has taken precuations to prevent accidental ignition or reaction of ignitable or reactive waste - 373-3.2(h)(1) X

(c) ___ Generator has placed "No Smoking" signs conspicuously wherever there is a hazard from ignitable or reactive waste - 373-3.2(h)(1) X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

9. The generator complies with the following special requirements related to incompatible wastes: 373-3.9(g)

(a) The storage of ignitable or reactive wastes, and the mixture or comingling of incompatible wastes, or incompatible wastes and materials, is conducted to prevent - 373-3.2(h)(2)

(1) ___ the generation of extreme heat or pressure, fire or explosion, or violent reaction - 373-3.2(h)(2)(i) X

(2) ___ production of uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health - 373-3.2(h)(2)(ii) X

(3) ___ production of uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions - 373-3.2(h)(2)(iii) X

(4) ___ the damage to the structural integrity of the device or facility containing the waste - 373-3.2(h)(2)(iv) X

(5) ___ a threat to human health or the environment - 373-3.2(h)(2)(v) X

(b) ___ Hazardous waste must not be placed in an unwashed container that previously held an incompatible waste or material. 373-3.9(g)(2) X

(c) ___ Hazardous waste in containers stored nearby incompatible waste or material is separated by the incompatible waste by a dike, berm, wall or other device. 373-3.9(g)(3). X

D. Standards for management of tanks - 372.2(a)(8)(ii); 373-3.10

1. What are the approximate number and size of tanks containing hazardous waste?

5 - 10,000 gallon tanks (permitted for >90day storage)
20 Unpermitted tanks (for storage <90 days)

2. Identify the waste treated/stored in each tank. Include whether they are above or below ground.

Underground - The wastes stored in the permitted tanks comply with the permit

3. ___ Each tank is marked with the words "Hazardous Waste" N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

Tank General Operating Requirements - 373-3.10(b)

4. ____ Hazardous wastes or treatment reagents are not placed in a tank, if they could cause the tank or its inner liner to rupture, leak, corrode, or otherwise fail before the end of its intended life - 373-3.10(b)(2). If so, please explain. X

5. ____ Uncovered tanks have at least 60 centimeters (2 feet) of freeboard or an adequate containment structure - 373-3.10(b)(3) NA

6. ____ Where waste is continuously fed into a tank, the tank must be equipped with a means to stop the inflow (e.g., bypass system to a standby tank or a waste feed cutoff system) - 373-3.10(b)(4) X

Tank Waste Analysis - 373-3.10(c)

7. ____ There is a waste analysis plan if tank is to be used to chemically treat or store a hazardous waste substantially different from the previous waste, or if a different process is used from the previous process. (Complete Appendix A, Number 4). NA

Tank Inspections - 373-3.10(d)

8. Tank(s) are inspected each operating day for:

(A) ____ discharge control equipment (e.g., waste feed cutoff systems, bypass systems and drainage systems) - 373-3.10(d)(1)(i) X

(B) ____ monitoring equipment (e.g., pressure and temperature gauges) - 373-3.10(d)(1)(ii) NA

(C) ____ level of waste in tank to ensure proper freeboard - 373-3.10(d)(1)(iii) X

9. Tank(s) are inspected weekly for:

(A) ____ Corrosion or leaking of fixtures or seams - 373-3.10(d)(iv) NA

(B) ____ Erosion or obvious signs of leakage (e.g., wet spots or dead vegetation) of the construction materials of, and the area immediately surrounding discharge confinement structures (e.g., dikes). 373-3.10(d)(v) X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

Ignitable or reactive wastes - 373-3.10(f)

10. ___ Ignitable or reactive waste is placed in a tank and the waste is stored, treated, rendered or mixed before or immediately after placement in the tank so that the resulting wastes, mixture or dissolution of material is no longer ignitable or reactive. ___

11. ___ Ignitable and reactive waste is stored in a tank and the tank is used solely for emergencies. NA

12. ___ Storage of ignitable or reactive waste in covered tanks complies with the National Fire Protection Association's (NFPA's) buffer zone requirements for tanks, contained in Tables 2-1 thru 2-6 of the "Flammable and Combustible Liquids Code, 1981." X

Incompatible Wastes - 373-3.10(g)

13. ___ Incompatible wastes, or incompatible wastes and materials must not be placed in the same tank unless 373-3.2(h)(2) is complied with. 373-3.10(g)(1) NA

14. ___ Incompatible wastes must not be placed in an unwashed tank which previously held an incompatible waste or material unless 373-3.2(h)(2) is complied with. 373-3.10(g)(2) NA

Special Requirements in sole source aquifer areas - 373-3.10(h)

15. ___ The base underlying the tank is free of cracks and is sufficiently impervious to contain leaks. NA

16. ___ The base is designed to drain or the tank is elevated to prevent contact with accumulated liquids. —

17. ___ Containment system can contain at least 110 percent of tank volume. —

18. ___ Run-on into containment system is prevented or designed for. —

19. ___ Leaked waste or accumulated precipitation is timely removed to prevent possible overflow. —

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

4. Manifest Records and Reporting

A. ___ It appears, from the available information, that there is a manifest copy available for each hazardous waste shipment off-site that has been made - 372.2(b)(5)(i). X

If "violation" checked or "don't know," please elaborate.

B. Describe the approximate size of an average shipment made and how many shipments per month? ___

Shipments vary in size ~ 900 Manifest/YR.

C. Each manifest (a representative sample) has the following information: - 372.2(b)(1); Appendix 30

	Generator	Transporter 1	Transporter 2	TSDF	
1. ___ Name of	X	X	—	X	X
2. ___ EPA ID No. of	X	X	—	X	X
3. ___ Mailing Address of	X	X	—	X	X
4. ___ Telephone No. of	X	X	—	X	X
5. ___ Manifest Document No.	X	X	—	X	X
6. ___ The proper USDOT description.					X
7. ___ The appropriate ok quantity, ok container no. ok container type, and ok waste type by units of weight or volume.					X
8. ___ Signed certification that the materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation under regulations of the USDOT and NYSDEC - 372.2(a)(4) and 372.2(a)(5) and 372.2(a)(6).					X
9. ___ Signed copies of the manifest records have been retained at the facility for at least three years - 372.2(c)(1)(i)					

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

D. ___ There is written communication that the designated treatment, storage or disposal facility is an authorized treatment, storage or disposal facility for the particular wastes being offered for shipment and has capacity to accept the hazardous waste set forth on the manifest and will assure the ultimate disposal method is followed. 372.2(b)(2)(i) X

E. ___ The generator must distribute copies of the manifest as specified on the manifest form - 372.2(b)(3) X

F. International shipments - 372.5

(1) ___ EPA has been notified four weeks prior to shipment of hazardous waste destined for treatment, storage or disposal outside the United States - 372.5(b)(1) X

(2) ___ Delivery of the wastes has been confirmed within 90 days of acceptance of initial transporter - 372.5(b)(2) X

(3) ___ The generator has identified the point of departure from the United States through which the waste must travel before entering a foreign country - 372.5(b)(3)(ii) X

G. ___ Has complied with interstate shipments - 372.6 X

H. ___ Has complied with shipments by rail or water (bulk) - 372.7 NA

I. ___ Copies of all records have been kept for at least three years (e.g., annual reports, manifests, exception reports, sampling data) - 372.2(c)(1)(i), (ii), and (iii). X

J. ___ All records required under this subdivision were furnished upon request, or made available at a reasonable time for inspection - 372.2(c)(1)(iv) X

K. ___ The generator has received signed copies (from the TSD facility) of all manifests for wastes shipped off-site more than 20 days ago: X

___ If not, exception reports have been submitted covering these shipments - 372.2(c)(3) X

L. ___ A generator annual report has been prepared and sent to the department. 372.2(c)(2) X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

5. Personnel Training - 372.2(a)(8)(ii) and 373-3.2(g)

A. There is a:

___ written description of the job title for each position at the facility related to hazardous waste management and name of the employee filling each job - 373-3.2(g)(4)(i) NA

___ written job description for each position 373-3.2(g)(4)(ii) NA

___ written description of the type and amount of both introductory and continuing training that will be given to each person related to hazardous waste management - 373-3.2(g)(4)(iii) X

___ Records that document the training or job experience required 373-3.2(g)(4)(iv) has been given to and completed by facility personnel. X

B. ___ The training program is directed by a person trained in hazardous waste management procedures and must include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. 373-3.2(g)(1)(i),(ii) and (iii). The components are: X

(1) ___ Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment; X

(2) ___ Key perameters for automated waste feed cutoff systems; X

(3) ___ Communications or alarm systems; X

(4) ___ Response to fires and explosions; X

(5) ___ Response to groundwater contamination incidents; and X

(6) ___ Shutdown of operations. X

C. ___ Facility personnel have successfully completed the program by the effective date of these regulations or six months after the date of their employment. 373-3.2(g)(2) X

D. ___ Facility personnel have taken part in an annual review of the initial training required. 373-3.2(g)(3) X

IBM does not use job descriptions

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

E. ___ Training records on current personnel have been kept permanently at the facility (until closure). 373-3.2(g)(5) X

F. ___ Training records on former employees have been kept for at least three years from the date the employee last worked at a facility. 373-3.2(g)(5) X

6. Preparedness and Prevention - 372.2(a)(8)(ii); 373-3.3

A. ___ The facility is maintained and operated to minimize the possibility of a fire or explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water - 373-3.3(b) X

B. The facility must be equipped with the following (Check missing equipment if needed in this facility's particular operations.) - 373-3.3(c)

(1) ___ An internal communication or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel; X

(2) ___ A device, such as a telephone or a hand-held, two-way radio capable of summoning emergency assistance from local police departments, fire departments or state or local emergency response teams; X

(3) ___ Portable fire extinguishers, fire control equipment. X

(4) ___ Water at adequate volume and pressure to supply water hose streams, or foam-producing equipment, or automatic sprinklers, or water spray systems. X

C. ___ Facility communications or alarm systems, fire protection equipment, and spill control equipment are tested and maintained as necessary to assure their proper operation in time of emergency - 373-3.3(d) X

D. ___ Personnel involved in hazardous waste operations have immediate access to an internal alarm or emergency communication device 373-3.3(e) X

E. ___ The facility has the required aisle space - 373-3.3(f) (Inspections should be able to be made of each drum and space should be sufficient to fight a fire).

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

F. The facility owner or operator has made an attempt in good faith to make the following arrangements with local authorities, as appropriate for the type of waste handled at the facility and the potential need for the services of these organizations - 373-3.3(g)(1):

(1) ___ Arrangements to familiarize police, fire departments and emergency response teams with the functions and layout of the facility; X

(2) ___ Where more than one police and fire department might respond to an emergency, an agreement designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to primary emergency authority; X

(3) ___ Agreements with government emergency response teams, emergency response contractors, and equipment suppliers; X

(4) ___ Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illness which could result from fires, explosions or releases at the facility; and X

(5) ___ Where state or local authorities decline to enter into such arrangements, the owner or operator has documented the refusal in the operating record. X

7. Contingency Plan and Emergency Procedures - 372.2(a)(8)(ii); 373-3.4

A. ___ The facility has a contingency plan or some other emergency plan which incorporates hazardous waste management. X

B. The following are included in the contingency plan - 373-3.4(c) X

(1) ___ A description of actions facility personnel must take in response to fires, explosions or any unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil or surface water;

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(2) ___ A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services; X

(3) ___ Names, addresses and phone numbers of all persons qualified to act as emergency coordinator; X

(4) ___ A list of all emergency equipment at the facility, and decontamination equipment, where this equipment is required; X

(5) ___ The location and the physical description of each item on the list, and a brief outline of its capabilities; X

(6) ___ An evacuation plan for facility personnel, where there is a possibility that evacuation could be necessary. X

C. ___ Copies of the contingency plan are maintained at the facility - 373-3.4(d)(1) X

D. ___ Copies of the contingency plan have been submitted to all local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services - 373-3.4(d)(2) X

E. ___ The contingency plan has been amended - 373-3.4(e) X

F. ___ There was at least one employee either on the facility premises or on call with the responsibility for coordinating all emergency response measures - 373-3.4(f) X

G. ___ During a past emergency situation the emergency coordinator (or his designee when the emergency coordinator is not on call) immediately activated emergency procedures - 373-3.4(g) X

The following was done:

(1) ___ Activated internal facility alarms or communication systems; X

(2) ___ Notified appropriate state or local agencies; X

(3) ___ Immediately identified the character, extent, exact source, amount and areal extent of any released materials; X

(4) ___ The emergency coordinator assessed possible hazardous to human health and the environment; X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(5) ___ The emergency coordinator, after determining that the facility had a release, fire or explosion which could threaten human health or the environment outside the facility, reported his findings; X

(6) ___ During the emergency, the emergency coordinator took all reasonable measures necessary to ensure that fire, explosions and releases do not occur, recur or spread to other hazardous waste; X

(7) ___ The emergency coordinator monitored for leaks, pressure buildup, gas generation or ruptures in valves, pipes or other equipment, where appropriate during the facility's response to the emergency; X

(8) ___ The emergency coordinator provided for treating, storing or disposing of recovered waste, contaminated soil or surface water, or any other material that resulted from a release, fire or explosion at the facility; X

(9) ___ The emergency coordinator ensured that in the affected area no waste that may be incompatible with the released material was treated, stored or disposed of prior to cleanup procedures being completed; NA

(10) ___ The emergency coordinator ensured that all emergency equipment listed in the contingency plan was cleaned and fitted for its intended use before operations were resumed; X

(11) ___ The owner or operator notified the Commissioner that the facility is in compliance with Part 373-3.4(g)(8) before operations were resumed in the affected areas of the facility; X

(12) ___ The owner or operator noted in the operating record the time, date and details of the incident that required implementation of the contingency plan; X

(13) ___ The owner or operator submitted a complete written report on the incident within 15 days after the incident occurred. X

New York State Department of Environmental Conservation
Division of Solid and Hazardous Waste
Bureau of Hazardous Waste Operations
50 Wolf Road, Albany, New York 12233

Handler Name IBM
EPA ID No. NYD000707901

Appendix A

Treatment, Storage and Disposal Inspection Section
so complete for generators over sole source aquifer areas.

dicate:

Violations

Indicate:

X Satisfactory
NA Not Applicable

Owner Transfer

(A) ___ The facility has transferred ownership or operation of facility with prior written approval of the Department - 373-2.2(b)(1). NA

(B) ___ Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, the owner or operator notified the new owner or operator in writing of the requirements - 373-3.2(c)(2). NA

Sampling

(A) ___ The owner or operator obtained a sample of the waste and had it analyzed - 373-3.2(d)(1)(i); or X

(B) ___ The analysis included data developed under 6NYCRR Part 371, and existing published or documented data on the hazardous waste or on waste generated from similar processes - 373-3.2(d)(1)(ii) X

(C) ___ The analysis has been repeated as necessary to ensure that it is accurate and up to date - 373-3.2(d)(1)(iii) X

3. Waste Analysis Plan - (Spent Battery Reclaimers do not have to meet Waste Analysis)

(A) ___ The owner or operator has developed and followed a written waste analysis plan - 373-3.2(d)(2) X

(B) ___ The owner or operator keeps this plan at the facility - 373-3.2(d)(2) X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(2) Disturbance of the waste or equipment, by the unknowing or unauthorized entry of persons or livestock onto the active portion of a facility, may cause a violation of the requirements - 373-3.2(e)(1)(ii) (YES) OR NO

(B) If not exempt under A1 or A2 above, the facility must have the following:

(1) ___ A 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility - 373-3.2(e)(2)(i) or X

(2) ___ An artificial or natural barrier which completely surrounds the active portion of the facility - 373-3.2(e)(2)(ii)(a) and X

___ A means to control entry, at all times, through the gates or other entrances to the active portion of the facility - 373-3.2(e)(2)(ii)(b) X

(3) ___ A sign with the legend, "Danger - Unauthorized Personnel Keep Out" posted at each entrance to the active portion of a facility, and at other locations, in sufficient numbers to be seen from any approach to that active portion - 373-3.2(e)(3). X

5. General Inspection Requirements - 373-3.2(f)

(A) ___ The owner or operator has inspected the facility for malfunctions and deterioration, operator errors, and discharges which may be causing - or may lead to release of hazardous waste constituents to the environment, or a threat to human health - 373-3.2(f)(1) X

(B) (1) ___ The owner or operator has developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that are important to preventing, detecting or responding to environmental or human health hazards - 373-3.2(f)(2)(i) X

(2) ___ He has kept the written inspection schedules at the facility - 373-3.2(f)(2)(ii) X

(3) ___ The schedule identifies the types of problems which are to be looked for during the inspection - 373-3.2(f)(2)(iii) X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(4) ___ The frequency of inspection is based on the rate of possible deterioration of the equipment and the probability of an environmental or human health incident, if the deterioration or malfunction or any operator error goes undetected between inspections - 373-3.2(f)(2)(iv) X

(C) ___ The owner or operator has remediated deterioration or malfunction of equipment or structures which the inspection has revealed - 373-3.2(f)(3) X

(D) ___ The owner or operator has recorded inspections in an inspection log or summary - 373-3.2(f)(4) X

(E) ___ The inspection log or summary has been kept for at least three years from the date of inspection - 373-3.2(f)(4) X

(F) ___ The records, at a minimum, include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions - 373-3.2(f)(4) X

6. Ignitable or reactive wastes - Complete Part II, questions 3C 8 and 9 and 3D 10-12.

7. Personnel Training - Complete Part II 5.

8. Preparedness and Prevention - Complete Part II 6

9. Contingency Plan and Emergency Procedures - Complete Part II 7

10. Manifest system, recordkeeping and reporting -

The regulations in this paragraph apply to the owners and operators of all hazardous waste facilities.

A. Operating Record - 373-3.5(c)

(1) ___ There is an operating record. X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(2) ___ The owner or operator has kept a written operating record at his facility. X

(3) The following information is included in the operating record, as it becomes available, or maintained in the operating record until closure of the facility:

(a) ___ A description and the quantity of each hazardous waste received; X

(b) ___ The method(s) and date(s) of its treatment, storage or disposal at the facility; X

(c) ___ The location of each hazardous waste within the facility and the quantity at each location; X

(d) ___ (For disposal facilities) The location and quantity of each hazardous waste must be recorded on a map or diagram of each cell or disposal area. NA

(e) ___ Information must include cross references to specific manifest document numbers, if the waste was accompanied by a manifest; X

(f) ___ Records and results of waste analyses and trial tests performed; X

(g) ___ Summary reports and details of all incidents that require implementing the contingency plan; X

(h) ___ Records and results of inspections; X

(i) ___ Monitoring, testing or analytical data where required X

(j) ___ All closure cost estimates. X

(k) ___ (For disposal facilities) All post-closure cost estimates. NA

B. Manifest

(1) Upon receipt of manifested shipment of hazardous waste the owner or operator:

(a) ___ determined significant discrepancies from those stated on the manifest - 372.4(b)(1)(i) NA

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(b) ___ determined that all portions of the manifest have been completed - 372.4(b)(1)(ii), Explain _____ X

_____

_____

(c) ___ distribute copies of the manifest according to the instructions with the manifest form - 372.4(b)(4) X

(2) Upon receipt of an unmanifested shipment of hazardous waste the owner and operator:

(a) ___ determined the reason why the shipment was not accompanied by a manifest - 372.4(c)(1) NA

(b) ___ filed an unmanifested waste report after accepting the waste - 372.4(c)(3)

(3) ___ Facility accepted a particular hazardous waste without an authorized permit to do so - 372.4(f)(i)

(4) ___ Facility accepted a hazardous waste without having adequate treatment, storage or disposal capacity available. - 372.4(f)(ii)

C. Availability, retention and disposition of records

(1) ___ All records, including plans, required under this Part are furnished upon request, and made available at all reasonable times for inspection - 373-3.5(d)(1). X

(2) ___ All reports and records required were retained for three years from the date of submittal - 372.4(d)(3)(i) X

(3) ___ Upon closure of the facility, a copy of records of waste disposal locations and quantities under subparagraph 373-3.5(d) was submitted to the Commissioner and the county clerk's office of the county in which the facility is located - 373-3.5(d)(3). X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

D. Additional reports - 373-3.5(g)

(1) ___ A TSDF Annual Report has been submitted to the department 373-3.5(e). X

(2) ___ Releases, fires and explosions as specified in paragraph 373-3.4(g)(10) - 373-3.5(g)(1) X

(3) ___ Groundwater contamination and monitoring data as specified in subdivisions 373-3.6(d) and 373-3.6(e) - 373-3.5(g)(2) NA

(4) ___ Facility closure as specified in subdivision 373-3.7(f) - 373-3.5(g)(3) NA

11. Groundwater monitoring. - 373-3.6

(A) ___ A groundwater monitoring plan is required. NA

(B) ___ ATTACH COMPLETED GROUNDWATER MONITORING QUESTIONNAIRE - APPENDIX C

(C) ___ A groundwater monitoring program is required, and has been instituted.

12. Closure and post-closure. - 373-3.7

(A) ___ The owner or operator has a written closure plan - 373-3.7(c)(1) X

(1)___ The plan is kept at the facility - 373-3.7(c)(1) X

(2) The plan identifies: X

(a)___ How and when the facility will be ___ partially closed if applicable, and ___ ultimately closed - 373-3.7(c)(1)(i)

(b)___ The maximum extent of the operation which will be unclosed during the life of the facility - 373-3.7(c)(1)(i) X

(c)___ All the hazardous waste and hazardous waste residues that must be removed from tanks, discharge control equipment, and discharge confinement structures - 373-3.10(e). X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(d)___ An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the life of the facility - 373-3.7(c)(1)(ii) X

(e)___ A description of the steps needed to decontaminate facility equipment during closure - 373-3.7(c)(1)(iii) X

(f) A schedule for final closure including:

___ An estimate of the expected year of closure - 373-3.7(c)(1)(iv) X

___ The total time required to close the facility - 373-3.7(c)(1)(iv) X

___ The time required for partial closure activities which will allow tracking of the progress of closure - 373-3.7(c)(1)(iv) X

(B)___ The owner or operator has amended his plan when changes in operating plans or facility design affect the closure plan - 373-3.7(c)(2) NA

(C)___ The owner or operator has submitted his closure plan to the Commissioner at least 180 days before the date he expects to begin closure - 373-3.7(c)(3) NA

NOTE: The following (13D - 13J) are for owners and operators of disposal facilities only.

(D) Post-closure care consists of at least:

1. ___ Groundwater monitoring and reporting - 373-3.7(g)(1)(i) NA

2. ___ Maintenance of monitoring and waste containment systems - 373-3.7(g)(1)(ii)

3. ___ Maintenance of any or all of the security requirements if required by the Commissioner - 373-3.7(g)(2)

(E) Post-closure use of property on or in which hazardous waste remains after closure is disturbing the integrity of the ___ final cover, liner(s), or ___ other components of any containment system, or ___ the function of the facility's monitoring systems, and the owner or operator has demonstrated to the Commissioner, either in the post-closure plan or by petition, that the disturbance:

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

1. ___ Is necessary to the proposed use of the property, and will not increase the potential hazard to human health or the environment - 373-3.7(g)(3)(i) — NA

2. ___ Is necessary to reduce a threat to human health or the environment - 373-3.7(g)(3)(ii).

(F) ___ The owner or operator of a disposal facility has a written post-closure plan - 373-3.7(h)(1)

(G) ___ The owner or operator of a disposal facility keeps this plan at the facility - 373-3.7(h)(1)

(H) This plan identifies:

1. ___ Groundwater monitoring activities and frequencies - 373-3.7(h)(1)(i)

2. ___ Maintenance activities and frequencies - 373-3.7(h)(1)(ii)

(I) ___ The owner or operator has amended his post-closure plan, and changes have occurred in operating plans or facility designs which affect his post-closure plan - 373-3.7(h)(2)

13. Financial requirements - 373-3.8 Generators only in sole source aquifer areas do not have to meet financial requirements.

(A)___ The owner or operator has a written estimate of the cost of closing the facility - 373-3.8(c)(1) — X

(B)___ The estimate appears to equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure the most expensive, as indicated by its closure plan. (PLEASE EXPLAIN) — X

(C)___ Within 30 days after each anniversary of the date on which the first closure cost estimate was prepared, the owner or operator has adjusted the latest closure cost estimate - 373-3.8(c)(2) — X

(D)___ The owner or operator has revised the new closure cost estimate whenever a change in the closure plan affects the cost of closure - 373-3.8(c)(3) — NA

(E)___ The owner or operator has kept this estimate, and all subsequent estimates required at the facility - 373-3.8(c)(4) — X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(QUESTIONS (F) THRU (I) ARE FOR OWNERS AND OPERATORS OF DISPOSAL FACILITIES)

(F)___ The owner or operator of a disposal facility has a written estimate of the annual costs of post-closure monitoring and maintenance of the facility - 373-3.8(e)(1) N/A

(G)___ Within 30 days after each anniversary of the date on which the first post-closure cost estimate was prepared, during the operating life of the facility, the owner or operator has adjusted the latest post-closure cost estimate - 373-3.8(e)(2)

(H)___ The owner or operator has prepared an annual post-closure cost estimate whenever a change in the post-closure plan affects the cost of post-closure care - 373-3.8(e)(3)

(I)___ The owner or operator has kept this estimate, and all subsequent estimates required in this Section, at the facility - 373-3.8(e)(4)

15. Use and management of containers. - 373-3.9

(A) Complete Part II-3 C

(B)___ Incompatible wastes, or incompatible wastes and materials, are not placed in the same container. - 373-3.9(g)(1) X

(C)___ Hazardous waste is not placed in an unwashed container that previously held an incompatible waste or material. - 373-3.9(g)(2) X

(D)___ A storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks or surface impoundments, is separated from the other materials or protected from them by means of a dike, berm, wall or other device. - 373-3.9(g)(3) X

16. Tanks. - 373-3.10

(A) Complete Part II-3D

(B) The tank is to be used to chemically treat or store a hazardous waste which is substantially different from waste previously treated or stored in that tank, and the owner or operator has, before treating or storing the different waste or using the different process:

(1)___ Conducted waste analyses and trial treatment or storage tests (e.g., bench scale or pilot plant scale tests - 373-3.10(c)(1)(i)(a) or N/A

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(2)___ obtained written, documented information on similar storage or treatment of similar waste under similar operating conditions - 373-3.10(e)(1)(i)(b) NA

(C) Chemically treat hazardous waste with a substantially different process than any previously used in that than, and the owner or operator not, before treating or storing the different waste or using the different process:

(1)___ Conducted waste analyses and trial treatment or storage tests (e.g., bench scale or pilot plant scale tests) - 373-3.10(c)(1)(ii)(a) or NA

(2)___ Obtained written, documented information on similar storage or treatment of similar waste under similar operating conditions. - 373-3.10(c)(1)(ii)(b) NA

NOT FOR RELEASE TO COMPANY, PROTECTED INFORMATION

PART III

Comments, Conclusions and Recommendations Section

Facility Name IBM

EPA I.D. No. NYD000720191

Date of Inspection 2/3/87

General Comments and Conclusions (cite appropriate State regulations in violation and attach additional sheets and other information as required)

The Violation noted was:
- Two containers were dented and were not in good condition in violation of 373-3.9(b) and their part B permit conditions

NOT FOR RELEASE TO COMPANY, PROTECTED INFORMATION

Recommendations EPA I.D. No. NYD000720701

___ Formal confidentiality is being requested.

___ No follow-up necessary.

___ Do you recommend that the central office wait a maximum of two weeks for you to review supplemental documents prior to determining if a warning letter should be issued?

___ A soft warning letter should be issued.

___ A strong warning letter should be issued.

___ A complaint letter should be issued and a fine levied.

___ DO NOT PROCESS, THIS COMPANY HAS BEEN REFERRED TO THE BUREAU OF ENVIRONMENTAL CONSERVATION INVESTIGATION (BECI) ON _____ (Date).

___ Facility representative would like a copy of report (inspector submit two copies to C.O. and C.O. will send with reply)

___ Facility representative has been given a copy of report on _____ (Date) (inspector submit one copy to C.O.)

X Other (please explain)

Enforcement to be handled by EPA

___ Sample(s) have been taken.

Comments on sample results: _____

IBM corp
NY0000707901

Appendix M
Part B Inspection Section

Module I - Standard Conditions

Inspection and Entry - Entrance to the site and access to records was granted. Facility was in compliance with this condition

Monitoring and Records - In compliance with Permit.

Reporting Planned Changes - The physical alterations to Bldg. 309 (container storage area) was reported to the Regional Administrator of EPA.

Certification of Construction or Modification - The facility representatives are aware that they will have to comply with this condition before the commencement of storage of Hazardous waste in the altered storage area in Bldg. 309.

Anticipated Noncompliance - Not applicable (NA)

Transfer of Permits - NA

Compliance Schedule - Has been met

Twenty-four Hour Reporting - On 9/10/86 this facility had a xylene spill of approx. 300 gallons. The National Response Center and the New York State spill Hotline

IBM
NYD 000707901

were notified within 24 hours. The New York State Dept of Environmental Conservation was notified within 15 days in writing but EPA was not notified within the 5 days required by the permit conditions. The spill was outside the permitted storage area and was a spill of a raw product. The company representatives questioned whether this type of spill is subject to this permit condition. This matter will have to be clarified.

Unmanifested Waste Report - NA

Manifest Discrepancy Report - NA

Additional Noncompliance Reporting - NA

Signatory Requirements - In Compliance with Permit

Confidential Information - NA

Documents To Be Maintained At The Facility -
The required documents are maintained at the facility in compliance with the permit.

Major/Minor Modifications - In Compliance

All Reports and Submittals - In Compliance

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Module II - General Facility Conditions

Design and Operation of Facility - In Compliance

Required Notice - In compliance

General Waste Analysis - In Compliance

Security - In Compliance

General Inspection Requirements - In compliance

Personnel Training - In Compliance

General Requirements for Ignitable, Reactive or Incompatible Waste - In Compliance

Preparedness and Prevention - In compliance with all conditions.

Contingency Plan - In Compliance with all conditions.

Manifest System - This facility had one improperly filled out manifest. Manifest NYA 390960-0 had an error in the waste amounts. An enforcement action was initiated by New York State and a fine was levied.

IBM
, 4D000707901

Record keeping ar

Closure - Ir
conditions

Cost Estimate
with applicable

Financial Assi
Compliance.

Liability Require

Moc

Authorized Storag
Volume - T
being modified
Hazardous wast
in Bldg. 309 nc
operating recor
in the un perm
less than 90
storage area
knowledge.

Containment - I

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NYD000707901

Condition of Containers - Two c
were observed to have structural
(severe dents). These containers w
observed to be leaking. Facility
stated that these drums will be o
for transportation. I suggested tha
overpacked for accumulation or

Compatibility of Waste with Conta
In compliance

Management of Containers - In

Special Requirements for Ignita
Waste - In compliance

Special Requirements for Incompa
In Compliance

Module IV - Storage/Ti

Waste Identification - In com
shell Thickness is being maint
tested in 1985. Testing is due
in 1987.

Design of Authorized Tanks - I

containers
defects
were not
personnel
overpacked
t they be
storage.

iners -

Compliance

ble or Reactive

atible Waste. -

Treatment in Tanks

pliance. Minimum
ned and was
to be done again

Compliance

equirements - In Compliance

for Ignitable or Reactive
mpliance

s for Incompatible Wastes -

pection Schedule - In

H ndler Name IBM East Fishkill
EPA I.D. No. NYD 000707901

APPENDIX M

Part B Inspection Section

In the interim, complete the inspection form as usual. In addition, attach the special c nditions of the permit and describe any violations of those conditions, such as a change i.. their operations.

When completing the inspection report, your paperwork review should only address c anges or updates to specific plans, such as increasing the cost of closure due to inflation.

IBM EAST FISHKILL
-NYD000707901-

1) Waste Analysis Plan: The annual analysis of daily generated waste was available after the inspection.

2) Security Procedure: Security procedures were carried out as per approved permit.

3) General Inspection Schedule: Inspections are carried out and records are maintained as per the permit. The bi-annual comprehensive tank testing is scheduled for May 20 - 27, 1985. The results of the testing program are expected to be available July, 1985.

4) Personnel Training: The records are updated and maintained as per the approved permit.

5) Ignitable, Reactive or Incompatible: The facility complied with the requirements.

6) Contingency Plan and Procedure: Plans are updated and maintained at the facility. Company did not have any accidents.

7) Closure Plan: Closure Plan has been on file and closure cost estimate has been updated.

8) Containers: Drums were stacked and stored properly.

9) Tanks: Tanks are maintained as per permit conditions.

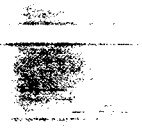
General Sciences Corporation,
Graphical Exposure Modeling System (GEMS).
Landover, Maryland, 1986.

IBM

Lat: 41°32'36"N Long: 73°49'09"W

Data List of Dataset: NYW8 Number of Records = 6

REC #	POP	HOUSE	DISTANCE	SECTOR
1	0	0	0.400000	1
2	0	0	0.810000	1
3	0	0	1.60000	1
4	4623	1421	3.20000	1
5	7239	2077	4.80000	1
6	10038	3057	6.40000	1



New York State Atlas of Community Water System Sources; NYS Department of Health, 1982.

DUTCHESS COUNTY

ID NO	COMMUNITY WATER SYSTEM	POPULATION	SOURCE
Municipal Community			
1	Amenia Water District #1	1000	Wells
2	Annandale Water Company	1000	Wells
3	Atlas Water Company	1300	Wells
4	Beacon City (See also No 3 Putnam Co)	5000	Mt. Beacon & Melzinga Reservoirs, Wells
5	Beekman Country Club	300	Wells
6	Brettview Acres Water Company	920	Wells
7	Brinkerhoff Water Company	3500	Wells
8	Central Wappinger Improvement Area	1800	Wells
9	Deerfield Estates Water District	900	Wells
10	Dogwood Knolls	600	Wells
11	Dover Plains Water Company	1500	Wells
12	Dover Ridge Estates	60	Wells
13	Dutchess Estates Inc	700	Wells
14	Fishkill Village	6000	Wells
15	Fleetwood Manor Water District	850	Wells
16	Grandview Water District	160	Wells
17	Greenfield Water District	1250	Wells
18	Greenmeadow Park Water Company	350	Wells
19	Harbourd Hills Water Company Inc	900	Wells
20	Hopegard, Inc	275	Wells
21	Hopewell Services Inc	900	Wells
22	Hyde Park Fire & Water District	4000	Crum Elbow Creek, Wells
23	Kensington Park Water Company	65	Wells
24	La Grange Club Estates	120	Wells (Infiltration Gallery)
25	Little Switzerland Water Company	600	Wells
26	Millbrook Village	1735	Wells
27	Millerton Village	1600	Wells
28	Moxon Knolls Water District	250	Wells
29	Oakwood Knolls	310	Wells
30	Pawling Village	2000	Pawling Reservoir, Wells
31	Pine Plains Water Company	1060	Wells
32	Pinewood Knolls	265	Wells
33	Poughkeepsie City	30000	Hudson River
34	Quaker Hill Estates Water District	424	Wells
35	Red Hook Village	2000	Wells
36	Revere Park Water Company	560	Wells
37	Rhinebeck Village	4200	Hudson River
38	Rockingham Farms	3000	Wells
39	Rokeby Homes, Inc	184	Wells
40	Schreiber Water Works	110	Wells
41	Shorehaven Civic Association	300	Wells
42	South Cross Road Water Company Inc	572	Wells (Infiltration Gallery)
43	Staatsburgh Water Company	1072	Indian Kill Reservoir, Wells
44	Taconic Estates	185	Wells
45	Tall Trees	250	Wells
46	Titusville Water District	700	Wells
47	Tivoli Village	713	Wells
48	Valley Dale Water Company	380	Wells
49	Wappinger Park Homes	400	Wells
50	Wappingers Falls Village	5300	Wells
51	Willow Lake Water Company	126	Wells
52	Windermere Highlands	375	Wells
Non-Municipal Community			
53	Angels Trailer Park	40	Wells
54	Arbor Arms Apartments	50	Wells
55	Arvans Mobile Court #1	72	Wells
56	Bard College	NA	Saw Kill Creek
57	Beckwith Trailer Park	26	Wells
58	BGB Mobile Home Park	137	Wells
59	Birchwood Mobile Home Park	42	Wells
60	Brooks Mobile Home Park	25	Wells
61	Cannons Trailer Park	16	Wells
62	Canterbury Garden Apartments	600	Wells
63	Cedar Hollow Mobile Home Park	90	Wells
64	Cedar Lane Mobile Home Park #2	28	Wells
65	Charlotte Grove Mobile Trailer Park	110	Wells
66	Chateau Hyde Park Home for Adults	120	Wells
67	Chelsea Ridge Apartments	1800	Wells
68	Clove Branch Apartments	19	Wells
69	Colonial Maples Trailer Park	30	Wells
70	Cooper Road Trailer Park	35	Wells
71	Cove View Apartments	48	Wells
72	Daytop Village	70	Wells
73	Dutch Garden Apartments	450	Wells
74	Dutchess Trailer Park	10	Wells
75	East Mountain Trailer Park	28	Wells
76	Eleanor Roosevelt	200	Wells
77	Elliott Apartments	36	Wells
78	Ennis Mobile Home Park	92	Wells
79	Feller Trailer Court	60	Wells
80	Fieldside Apartments	50	Wells
81	Fishkill Park Apartments	240	Wells
82	Franconi Villas	50	Wells
83	Gerhard P Stoltzel	30	Wells
84	Green Haven Correctional Facility	NA	Reservoir
85	Green Meadow Trailer Court	40	Wells
86	Greer School	300	Wells
87	Harlem Valley Psychiatric Center	1200	Swamp River
88	Haviland Apartments	100	Wells
89	Haviland Mobile Home Park #1	44	Wells
90	Haviland Mobile Home Park #2	29	Wells

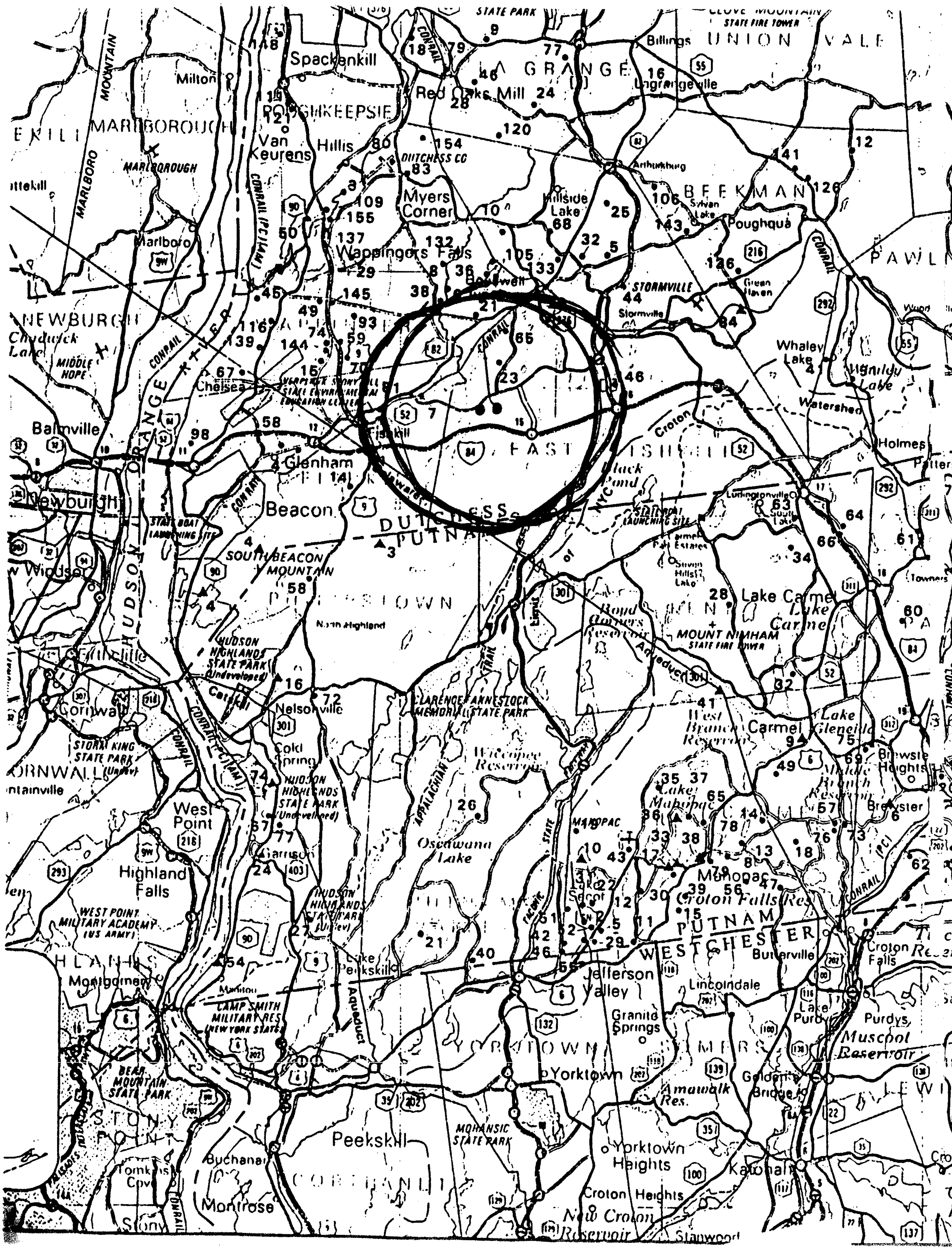
ID NO	COMMUNITY WATER SYSTEM	POPULATION	SOURCE
Non-Municipal Community			
91	Hi Vu	50	Wells
92	Hickory Hill Mobile Home Park	250	Wells
93	Hidden Hollow Apartments	850	Wells
94	Hidden Valley Mobile Court	30	Wells
95	High Meadows Park Inc	196	Wells
96	Hoffman Trailer Park	26	Wells
97	Hudson River Psychiatric Center	2000	Hudson River
98	Hudson View Water Works	1800	Wells
99	Hyde Park Mobile Manor Estates	NA	Wells
100	Hyde Park Terrace Apartments	70	Wells
101	Kent Hollow Apartments	24	Wells
102	Kommel Trailer Park	20	Wells
103	Lake Ellis Mobile Home Park	81	Wells
104	Lake Lodges Apartments	24	Wells
105	Lake Walton Park	62	Wells
106	Lakeview Mobile Home Park	NA	Wells
107	Lamplight Court Mobile Estates	23	Wells
108	Ledges Apartments	460	Wells
109	Little Falls Trailer Park	163	Wells
110	M and O Mobile Home Park	108	Wells
111	Maple Lane Trailer Park	150	Wells
112	May Lane Mobile Park	30	Wells
113	Maynards Mobile Manor	101	Wells
114	McCartha's Trailer Park	42	Wells
115	Mobile Home Gardens	30	Wells
116	Montclair Townhouse Apartments	660	Wells
117	Mountain View Mobile Estates	55	Wells
118	Northeastern Conference Nursing Home	120	Wells
119	Northern Dutchess Mobile Home Park	31	Wells
120	Odells Trailer Park	19	Wells
121	Osborne Trailer Park	15	Wells
122	Palmer Apartments	27	Wells
123	Parkway Apartments	16	Wells
124	Partridge Hill Apartments	150	Wells
125	Phillips Trailer Park	45	Wells
126	Pine Grove Mobile Home Park	39	Wells
127	Powell Road Mobile Park	115	Wells
128	Ramsey's Trailer Park	28	Wells
129	Red Church Trailer Park	12	Wells
130	Rhinebeck Country Village	100	Wells
131	Rhinebeck Mobile Court	120	Wells
132	Roberts Running Creek Trailer Park	88	Wells
133	Route 82 Trailer Park	26	Wells
134	Royal Crest Apartments	158	Wells
135	Sabo Trailer Park	45	Wells
136	Saith Mobile Home Park	26	Wells
137	Scenic Apartments	432	Wells
138	Scenic View Mobile Home Park	27	Wells
139	Shady Acres Trailer Park	26	Wells
140	Shady Homes Trailer Park	42	Wells
141	Shady Lane Trailer Park	13	Wells
142	Simpson Mobile Home Site	27	Wells
143	Springhill Mobile Home Park	NA	Wells
144	Sunset Farms Mobile Home Park	35	Wells
145	Sunset Knolls	50	Wells
146	Taconic Motor Lodge	22	Wells
147	Tatty Ho Mobile Estates	NA	Wells
148	Tai Apartments	14	Wells
149	The Lodge at Rhinebeck	NA	Wells
150	Unification Theological Church	150	Wells
151	Val Kill Park East	72	Wells
152	Valley Forge Mobile Home Park	60	Wells
153	Venture Lake Estates	44	Wells
154	Village Crest Apartments	600	Wells
155	Wappingers Falls Trailer Park	50	Wells
156	Wassaic Developmental Center	2300	Wells
157	Willow Tree Park	30	Wells
158	Wingdale Village Park	72	Wells
159	Woodcrest Manor Adult Home	NA	Wells
160	Woodfield Apartments	7	Wells

PUTNAM COUNTY

ID NO	COMMUNITY WATER SYSTEM	POPULATION	SOURCE
Municipal Community			
1	Alpine Village	340	Wells
2	Archer Estates	100	Wells
3	Beacon City (See Dutchess Co)		Cargill Reservoir
4	Blackberry Hill	400	Wells
5	Bonnyville Water Company	360	Wells
6	Brewster Heights	1100	Middle Branch Reservoir
7	Brewster Village	3700	East Branch Croton River
8	Capri Estates	140	Wells
9	Carmel Water District #2	4000	Lake Gleneida
10	Carmel Water District #3	1600	Lake Secor
11	Carmel Water District #4-Baldwin Water Company	1600	Wells
12	Carmel Water District #5-Maple terrace	180	Wells
13	Carmel Water District #6-Shell Valley	324	Wells
14	Carmel Water District #7-Tomahawk Creek	68	Wells
15	Chateau Ridge	300	Wells
16	Cold Springs Village	3000	Foundry Brook Reservoir
17	Colonial Drive	105	Lake Mahopac
18	Country Hill Estates	200	Wells
19	Crescent Road Water Supply	20	Wells
20	First Brewster Corporation	255	Wells
21	Floradan Lodge	400	Wells
22	Forest Park Homes	200	Wells
23	Fox Hill Estates	128	Wells
24	Garrison Water Supply	84	Wells (Infiltration Gallery)
25	George Walsh	48	Wells
26	Glenmar Gardens	NA	Wells
27	Greymoor Village	220	Wells
28	Gypsy Trail Club	300	Wells
29	Hillsdale Estates	240	Wells
30	Indian Hill	56	Wells
31	Ivy Hill Water Supply	240	Wells
32	Kent Water District #1	360	Wells
33	Lake View Park	400	Lake Mahopac
34	Leeside Estates	256	Wells
35	London Bridge Water Works	288	Wells, Well (Infiltration Gallery)
36	Mahopac Hills	480	Lake Mahopac
37	Mahopac Lake Shore Estates	80	Wells
38	Mahopac Ridge Water Supply	1600	Lake Mahopac
39	Mahopac Water Company	500	Wells
40	Mill Pond Water Supply	70	Wells
41	New York City - Aqueduct System (page 76)		Bog Brook, East Branch and Middle Branch Reservoirs (Croton Aqueduct System); Boyd Corners[1] (drained, unsafe dam), Croton Falls[2] and West Branch Reservoirs (Croton and Delaware Aqueduct Systems)
42	Rainbow Hill Estates	320	Wells
43	Red Mills Water Supply	400	Wells
44	Spring Knoll Estates	20	Wells
45	Star Ridge Manor	368	Wells
46	Sunrise Ridge	178	Wells
47	Union Valley Estates	290	Wells
48	Vails Grove	510	Wells
49	West Branch Acres	240	Wells
50	Wildwood Homes	148	Wells
51	Wood Hill Estates	100	Wells
52	York View	200	Wells
Non-Municipal Community			
53	Brewster Woods Condominium	200	Wells
54	Capuchin Theological Seminary	65	Reservoir, Wells
55	Carpenter Trailer Park	NA	Wells
56	Casa Serena Rest Home	39	Wells
57	Clearing in the Woods	162	Wells
58	Cold Spring Trailer Court	15	Wells
59	Elek Apartments	48	Wells
60	Forest Haven Apartments	400	Wells
61	Harmony Trailer Park	NA	Wells
62	Holly Stream Condominium Apartments	225	Wells
63	Kent Apartments	56	Wells
64	Kent Nursing Home	355	Wells
65	Knolls Trailer Court	NA	Wells
66	Ludingtonville Apartments	40	Wells
67	Malcolm Gordon School	41	Wells
68	Meadow Motor & Mobile Home Court	30	Wells
69	Middle Branch Apartments	41	Wells
70	Patterson Trailer Park	80	Wells
71	Patterson Village Condominiums	197	Wells
72	Post Road Mobile Home Park	NA	Wells
73	Putnam Community Hospital	111	Wells
74	St Basil Academy	40	Indian Brook
75	Tilly Foster Apartments	36	Wells
76	Vista on the Lake Condominiums	402	Wells
77	Walter Hoving Home	25	Wells
78	Wendolon Town House Apartments	150	Wells
79	Woodcrest Apartments	400	Wells

[1] Functions as part of Delaware System, overflow goes into Croton System.

[2] Functions as part of the Croton System but has limited capability to pump into the Delaware System.



STATE PARK
CLOVE MOUNTAIN
STATE FIRE TOWER
Billings
UNION VALE
Spackenkill
Milton
MOUNTAIN
LA GRANGE
Lagrangeville
Red Oaks Mill
POUGHKEEPSIE
MARLBOROUGH
Van Keurens
Hillis
DUTCHESS CC
MARLBORO
MARLBOROUGH
Arthursburg
BEEKMAN
Myers Corner
Hillside Lake
Sylvan Lake
Poughquag
Marlboro
Wappingers Falls
CONRAIL
Stormville
STORMVILLE
Green Haven
NEWBURGH
Chadwick Lake
MIDDLE HOPE
Whaley Lake
Chelsea
VERPLANCK STONY KILL STATE ENVIRONMENTAL EDUCATION CENTER
Watershed
Balmville
Fishkill
Croton
EAST FISHKILL
Holmes
Glenham
Newburgh
Beacon
DUTCHESS
PUTNAM
STATE BOAT LAUNCHING SITE
SOUTH BEACON MOUNTAIN
New Windsor
HUDSON
ORANGE
PHILIPSTOWN
North Highland
Lake Carmel
MOUNT NIMHAM STATE FIRE TOWER
HUDSON HIGHLANDS STATE PARK (Undeveloped)
Aqueduct
Nelsonville
CLARENCE FAHNESTOCK MEMORIAL STATE PARK
Cornwall
West Branch Reservoir
Carmel
Lake Gleneida
STORM KING STATE PARK
CORNWALL
Cold Spring
Brewster Heights
APPALACHIAN TRAIL
Lake Mahopac
West Point
Brewster
MAHOPAC
Oscawana Lake
Highland Falls
Mahopac
Croton Falls Res.
WEST POINT MILITARY ACADEMY (US ARMY)
PUTNAM
WESTCHESTER
Butterville
Croton Falls
Lake Peekskill
Jefferson Valley
Lincolndale
Montgomery
CAMP SMITH MILITARY RES (NEW YORK STATE)
Granite Springs
Lake Purdy
Purdys
Muscoot Reservoir
YORKTOWN
SOMERS
Yorktown
Amawalk Res.
Goldens Bridge
BEAR MOUNTAIN STATE PARK
STONY POINT
MOHANSIC STATE PARK
Peekskill
Buchanan
Yorktown Heights
Katonah
Tomkins Cove
CORTLANDT
Croton Heights
Montrose
New Croton Reservoir
Stanwood