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S. C. Hawkins, Z/325*

November 28, 2011

Director, Remedial Bureau C  
Division of Environmental Remediation  
New York State Department of Environmental Conservation  
625 Broadway  
Albany, New York 12233-7014

Subject: Solid Waste Management Unit Inventory Update

Reference: IBM East Fishkill Corrective Action Program  
IBM East Fishkill Facility  
Hopewell Junction, New York  
NYSDEC Part 373 Permit 3-1323-0025-00249-0  
EPA ID No. NYD000707901

Dear Director, Remedial Bureau C:

The purpose of this letter is to provide you with the required semiannual update of our Solid Waste Management Unit (SWMU) Inventory pursuant to Module III.C.1 and 2 of the initial above referenced Part 373 Permit issued in 1995. No SWMUs were added to the facility inventory during this semiannual period of May 2011 through October 2011.

Although there were no new SWMUs, tank locations were adjusted in two areas on the map based on field review. Tanks 123, 124 and 125 in the B/320B - B/310 alcove and tanks 103, 104, 105 and 106 between B/309 and B/303 were moved slightly on the map. A copy of the *NYSDEC Part 373 Permit Document, Module III Corrective Action, Map 1, Solid Waste Management Unit Location Map*, dated 10/27/11, is included.

This will be the last semiannual SWMU update pursuant to Module III.C.1 and 2 of the initial Part 373 Permit. The renewed Part 373 Permit was issued on 11/02/11. Per Module II.C.1 of the renewed permit, IBM will submit an annual notification of:

- any newly identified existing SWMUs constructed prior to the issuance of the Permit and located within an Area of Concern;
- any newly constructed SWMUs not listed in Module II of the Permit.

Also, IBM will submit notification within 15 days of newly identified existing SWMUs constructed prior to the issuance of the Permit and located outside of an Area of Concern. Subsequent SWMU maps will not include the former West Complex SWMUs because they are not listed in Module II of the renewed Part 373 Permit.

If you have any questions regarding this submittal, please contact Jackie Braungart at (845) 892-1672.

I certify under penalty of law that this document and all attachments were 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 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.

Sincerely,  
International Business Machines Corporation



Steven C. Hawkins, Manager  
Environmental Engineering

- c: NYSDEC Region 3, Regional Remediation Engineer (electronic copy)
- NYSDEC, Supervisor RCRA Permitting Section (electronic copy)
- R. Schatz, ESDC (without enclosure)
- USEPA Region 2, Chief RCRA Programs Branch (electronic copy)
- H. Wilkie, NYSDEC (electronic copy)

