

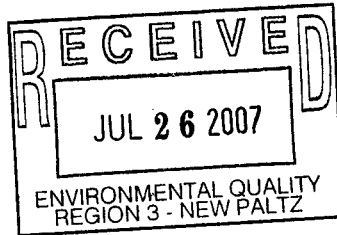
C&D TECHNOLOGIES, INC.

Power Solutions

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July 23, 2007

Mr. Frank Kelly
NYDEC
21 South Putt Corner Rd.
New Paltz, NY 12561



Dear Mr. Kelly;

Subject: C&D Huguenot Facility Decommissioning Report

Per your request, attached is a copy of the written summary report for the referenced decommissioning project.

Please call me at 215-619-7886 with any questions or comments.

Sincerely yours,

A handwritten signature in cursive script that reads "W.E. Kozlowski".

Walter E. Kozlowski
Director - EHS

C&D Technologies, Inc.
P.O. Box 209, Route 209
Huguenot, New York 12746
Final Facility Decommissioning and Closure Plan Report
March 2007

1.0 General Facility Information

Facility Specifications

- Approximately 10-acre parcel = 435,000 square ft.
- Approximately 287,000 square ft. building – masonry on slab

Phase 11 Site Assessment Findings

- No asbestos on site
- No PCB's on site
- No underground storage tanks on site – one underground tank was closed per NYDEC requirements
- The on-site lagoon contamination was not remediated per this facility decommissioning project. C&D is working with Mr. James Candiloro, New York DEC (Department of Environmental Conservation, Division of Environmental Remediation, Remediation Bureau, Albany, NY 12233) to develop a ROD for the groundwater and soil remedies and will conduct the required remediation per NYDEC approval of the remediation work plans.

2.0 C&D Contact Personnel/Project Manager

Walt Kozlowski – Director, Environment, Health & Safety
Facility Decommissioning Project Manager
C&D Technologies, Inc.
1400 Union Meeting Road
P.O. Box 3053
Blue Bell, PA 19422
Phone: 215-619-7886. Cell: 215-900-7745.

3.0 Decommissioning Goals

1. Attain maximum safety for workers performing the decommissioning and other on-site personnel.
2. Optimize the effectiveness, quality and timeliness of decommissioning procedures.
3. Maximize the protection of human health, safety and the environment in and around the work areas.

4. Attain the objective of zero fugitive dust emissions from the facility to the surrounding properties during all decontamination work.
5. Collect all unused and unwanted chemicals, chemical waste materials, and used oil and other petroleum products and dispose of as hazardous wastes per NYDEC requirements.
6. Clean all lead sediment from process tanks and vessels and recycle/recover lead at Revere or Doe Run Smelters.
7. Power wash all process equipment thoroughly prior to transfer to other facilities or disposal as scrap; visually inspect all washed equipment prior to leaving building.
8. Clean all lead and other sediment from floor trenches and sumps; dispose as hazardous waste or recycle lead at Revere or Doe Run Smelters.
9. Thoroughly power wash all interior building walls and floors after all equipment is removed from the building.

4.0 Environmental Consultants/Contractors utilized during Facility Decommissioning

Interior building and equipment decontamination was performed by Vicaretti and Sons, P.O. Box 628, Huguenot, New York 12746.

Envirosafe Corporation (14B Jan Sebastian Way, Sandwich MA 01563) was retained to conduct the following decommissioning activities: 1) collection and disposal of all unwanted waste chemicals, paints and petroleum products as hazardous waste; 2) decontamination and cleanout of all sulfuric acid and wastewater storage tanks; 3) cleanout and disposal or recycle of lead and other sediments from all trenches and sumps in the chemical storage room, ovens and all other building areas; and 4) any ancillary or additional decontamination work required at site.

United Process Control, 324 Courtyard Drive, Hillsborough, NJ was the contractor who removed and disposed of all of the used filter bags from the baghouses.

All contractors were trained and certified in the following:

- OSHA Respiratory Protection – 1910.134
- Lockout/Tagout – 1910.147
- Inorganic Lead Protection – 1910.1025
- HAZWOPER – 1910.120
- Confined Space Entry – 1910.146

All contractors prepared and followed a site specific 'Decommissioning Work Plan' and 'Health & Safety Plan'. All contractors submitted daily and weekly logs of work completed. Work logs are filed in the Huguenot Facility Closure Binder (Binder).

5.0 Decommissioning Project Health & Safety Requirements for Contractors and C&D Site Personnel

Personnel Protective Equipment Requirements

The protection requirements and procedures followed during the facility decommissioning were developed to assure that all occupational exposures were maintained within regulatory requirements and as low as reasonably achievable (ALARA).

- (1) The standard personnel protection equipment included full-face respiratory unit (includes eye and face protection), hard hat, coated tyvek® or similar suit (coverall), rubber boots or boot covers and work gloves.
- (2) Alternative personnel protection requirements may be specified by the area evaluation. If such is the case, each worker will receive instruction from the project supervisor or safety coordinator identifying the specific personal protection for the task at hand and/or the area being worked.
- (3) New personnel protective equipment will be issued to replace damaged or spent equipment. All spent or damaged personnel protective equipment will be containerized for proper disposal.
- (4) Strict personal hygiene practices must be followed by all contractors at all times. Smoking is not allowed on site. Clean changing room(s) will be made available for technicians working on this project. Storage equipment will be supplied for personal protective equipment. Each employee working in areas where airborne exposure to lead is above the permissible exposure limit (PEL), without regard to the use of respirators, will shower at the end of the work shift.

All consultant employees must wear, at a minimum, safety glasses with side shields and steel toe safety shoes while conducting the decontamination work. Full or half face respirators, with HEPA filters, must be worn by all employees who are engaged in sweeping up or collecting dry, fine lead dust from the floor, equipment or other areas.

Consultant shall develop and present a Health & Safety Plan, that will be followed during all decontamination tasks, and submit the Plan with the bid proposal. Consultant shall adhere to all lockout-tagout and confined space entry requirements during decontamination work.

C&D personnel will provide Health & Safety training and orientation, per C&D corporate guidelines, to all consultants prior to job commencement.

Action Levels

Demolition or salvage operations where lead or materials containing lead are present require that no personnel be exposed to lead at concentrations at or greater than fifty micrograms per cubic meter of air ($50 \mu\text{g}/\text{m}^3$) averaged over an 8-hour period. If a person will be exposed to airborne lead for more than 8 hours in any work day the

allowable exposure, as a time weighted average (TWA) for that day, will be reduced according to the following formula:

Allowable employee exposure (in $\mu\text{g}/\text{m}^3$) = 400 divided by hours worked in the day.

When respirators are used to limit exposure, as required by 29 CFR 1926.62(c) and all the requirements of section 29 CFR 1926.62(e)(1) and (f) have been met, exposure will be considered to be at the level provided by the protection factor of the respirator for the periods the respirator is worn.

Respiratory Protection Requirements

In accordance with 29 CFR 1910.134, all Respiratory Protection Program requirements will be followed. Personnel will be provided with full-face respirators to protect against lead aerosols and dust that may cause eye or skin irritation. Appropriate cartridges will be selected and provided to personnel. A filter cartridge with at least 99.97% efficiency will be selected.

Medical Emergency Requirements

All medical and emergency issues will be managed under a site-specific Health & Safety plan developed by the contractor.

In general, for minor situations requiring treatment, the work crew will suspend activities and a member of the work crew will assist the person requiring first aid. Appropriate C&D personnel will be immediately notified of the incident or injury. The work area will be inspected by C&D and contractor personnel to correct conditions that may have caused the injury.

In the case of a major medical emergency, the individual will be transported immediately to the hospital. Decontamination procedures may need to be followed for personnel and medical response providers.

6.0 Outside Agency Notifications

The following outside agency verbal and written notifications were made prior to and at the conclusion of all facility decommissioning activities. Copies of all written notifications are maintained in the Binder.

- Ms. Margaret Rawson – New York State Department of Labor, Occupational Safety and Health Administration, Albany, NY 12205
- Mr. Jack Hoyt – USEPA Region II, New York, NY 10007
- Mr. Tom Killeen – New York State DEC, Albany, NY 12233

- Mr. Leonard Meyerson – New York State DEC, Regional Water Engineer, White Plains, NY 10603
- Mr. Robert Stanton – Regional Air Pollution Control Engineer, New York State DEC, New Paltz, NY, 12561
- Mr. James Candiloro – New York State DEC, Division of Environmental Remediation, Albany, NY 12233
- Ms. Natalie Brown – Environmental Program Specialist, New York State DEC, Division of Water, Region 3, White Plains, NY 10603
- Ms. Cindy Joanni – New York State Division of Air Resources, New Paltz, NY 12561

7.0 Facility Decontamination Procedures

Pre-project Site Inspections

Prior to commencing on-site activities, each work area was inspected for contamination, safety concerns, physical hazards and other worker safety concerns. At this time, work areas were prepared for entry and cleaning.

Lockout-Tagout locks and tags were utilized as necessary to prevent unauthorized startup of locked-out electrical equipment. Permits for confined space entry were prepared, authorized and posted as necessary. Caution tape and signage was used to prevent unauthorized entry into areas being power washed to prevent cross contamination.

Contractor and C&D site specific Health & Safety Plans were reviewed throughout the project to ensure contractor and C&D employee safety.

Power Wash and Rinse Water Management

All water utilized for power washing equipment and building interiors was supplied by C&D from the facility on-site water system. Lead and other sediment that was generated during power washing operations was diverted to existing facility trenches and sumps with pumps that diverted the wastewater to the series of facility wastewater collection tanks.

In areas like the warehouse, where no wastewater collection trenches were available, all wash water was collected in shop vacuums, or similar devices, and the water was dumped into the facility wastewater collection system sumps and pumped to the wastewater collection tanks. Runoff control Berms and absorption 'pigs' were placed at all door and dock openings to prevent any wash water runoff outside of the building.

All collected lead-contaminated wastewater was pumped to tankers and disposed of/treated at the Envirosafe Corporation York, PA facility or at Republican Environmental Systems in Hatfield, PA. All shipping manifests and disposal documentation are stored in the Huguenot Facility Closure Binder. Nonhazardous

Certifications were received for each load of treated wastewater. All wastewater shipping and treatment documentations and certifications are in the Binder.

Power Washing of Equipment

The three-man crews from the Vicaretti Contractor were utilized to conduct all equipment power washing. A designated washing area was established in the Pasting and Plate Processing area inside of the building adjacent to large concrete sumps that were used to collect all of the wash water and divert it to the facility wastewater collection tanks.

Two contractors power washed and/or hand scraped each piece of equipment that was brought to this designated area. The third employee utilized a fork lift truck to re-position the equipment while it was being power washed.

The equipment clean up criteria was the absence of visual lead. Each piece of equipment was power washed (and, if necessary, scraped) until it was free of visual lead. A visual inspection of each piece of cleaned equipment was conducted by C&D or contractor personnel. The cleaned equipment was then either placed in a roll-off, for disposal at a smelter, or on a truck for shipment to another C&D facility.

Power Washing Building Walls and Floors

After the equipment was removed from the various facility rooms, each room was thoroughly power washed. Prior to commencing power washing of each room, C&D representatives provided the Vicaretti crew with instructions on what was to be washed. This was based on the degree of potential lead contamination from previous plant production operations. All power washing was conducted using standard 3,000 psi power washers.

Almost all rooms were thoroughly washed on three separate occasions: once after removal of all equipment located in that room, once after all equipment was removed from all adjacent rooms, and a final wash down was conducted after the entire building was emptied and all rigging crews were gone. Refer to Section 8 for detailed summaries of power washing actions completed in each facility area.

The clean-up goal for the building floors and walls was the absence of visual lead accumulation.

Building Roof Equipment Decontamination

Extra precautions were taken during decontamination and removal of the filter baghouses and related duct work, lead oxide silos, conveying and pneumatic systems, and all other equipment on the roof to eliminate fugitive dust emissions. Contractors vacuumed lead dust accumulation in the round duct work prior to dismantling and removal off of the

roof. All filter baghouse filter bags were placed in clean bags prior to being placed in hazardous waste disposal roll-offs. The lead oxide storage silos were cleaned out by the contractors prior to the silos being removed from the roof.

Heavy tarps and plastic sheets were placed below all equipment, that was being decontaminated and cut up for disposal, to collect any residual dust that fell from the equipment during these operations. This dust was vacuumed immediately and disposed of at Doe Run or Revere Smelter.

After all equipment was removed from the roof, all areas were power washed and vacuumed again to ensure that all dust contaminants were removed.

Interior Offices and Maintenance Room and Outside Area Clean-up and Segregation of Non-hazardous and Hazardous Materials and Wastes

After all equipment was cleaned and removed from the facility, the maintenance area and other storage rooms were cleaned out by Vicaretti contractor employees. All non-contaminated and non-hazardous material (equipment manuals, old uniforms, equipment parts, pallets and other debris) were collected and either placed in roll-offs for reclaim at smelters (re-claimable equipment parts) or in non-hazardous waste roll-offs (equipment manuals, etc.). All non-contaminated debris from outside plant areas were also cleaned up.

A hazardous waste roll-off was on site at all times for placement of unused plant equipment or other debris with lead contamination that was confirmed as hazardous through EPA TCLP testing or had visual lead contamination that could not be removed.

Fire-brick that was collected on-site was tested, per EPA TCLP criteria, and was found to be hazardous. All of the fire brick was placed in the hazardous waste roll-offs for disposal as a hazardous waste.

Equipment such as screw conveyors that had accumulated lead contamination that could not be removed was placed in the hazardous waste roll-offs. After all outside areas were cleaned of equipment and other debris, all remaining dirt and sediment around the filter baghouses and loading dock areas were scraped up with a front-end loader and placed in the hazardous waste roll-offs for disposal as hazardous waste.

Compressor Room Decontamination

The floors and walls of the compressor room were power washed to remove any oil accumulation. The wastewater was collected and pumped to the plant wastewater storage tanks.

Compliance with NYDEC and EPA Hazardous Waste Requirements

The facility hazardous waste generator status was conditionally exempt small quantity generator (CESQG) since it generated less than 100 kg/month of non-acute hazardous waste. The facility EPA ID no. was NY D064337298.

Per written confirmation from the NYDEC (Thomas Killeen, Chief, Inspection & Compliance Section, Division of Solid & Hazardous Materials, NYS Department of Environmental Conservation, Albany, NY), the Huguenot facility was not required to submit a formal RCRA closure plan for hazardous waste disposal or facility decontamination since the facility is only classified as 'Generator Status' and the facility is not located over any sole source aquifers required to have formal closure plans.

All hazardous waste disposal and facility decontamination were conducted by Envirosafe Corporation per 6 NYCRR Parts 373-1.1.(d)(iii), 373-3.7(b) and 373-3.10h. All unwanted chemicals, products, paints, and petroleum products were collected by Envirosafe personnel and stored in the Chemical Storage Room where they were inventoried and placed in lab packs. All hazardous waste shipments were properly manifested. The hazardous waste manifests and accompanying documentation are stored in the Binder.

The following waste codes were handled at the site in 2006 and 2007: D001, D002, D003, D005, D007, D009, D018, D035, F003, MA99 and MA95.

Waste corrosive liquids, waste hazardous liquids and non-RCRA regulated material were disposed of at Jones Environmental Services in Lowell, MA. Waste sodium hydrosulfite and other chemicals were disposed of at the Clean Harbors Reidsville site in Reidsville, NC. Waste flammable liquids and propane were disposed of at Pollution Control, Industries in East Chicago, IN. Waste sulfuric acid was disposed of at Republic Environmental Systems in Hatfield, PA. A copy of the 2006 Site Identification and Hazardous Waste GM Report Form is filed in the Binder.

Estimated quantities of hazardous materials disposed of in 2006 include the following:

- Sulfuric acid, lead – 19,447 gallons
- Waste sulfuric acid, spent – 145 gallons
- Hazardous waste, lead – 2,390 pounds
- Waste corrosive acid, sulfuric acid – 425 gallons
- Waste propane – 220 pounds
- Waste flammable liquids – 530 gallons
- Sodium hypochlorite – 140 pounds
- Waste mercury – 5 pounds
- Waste hydrochloric acid – 440 gallons
- Lead oxide, potassium permanganate – 20 pounds
- Waste ethanol – 220 gallons
- Waste paint related materials – 800 gallons
- Universal waste, mercury containing lamps – 205 pounds
- Waste nitric acid – 230 pounds
- Hazardous waste liquid, lead – 55 gallons

- Non DOT regulated material – 2,875 pounds

The enclosed concrete pad, where the 90 day storage of closed 55-gallon drums containing hazardous waste was conducted, was thoroughly power washed by Vicaretti personnel. All wash water was collected and pumped to the facility wastewater treatment storage tanks for disposal.

The inside Chemical Storage Room was cleaned out by Envirosafe personnel. All of the collected chemicals and sediment in the floor drains were cleaned out, placed in drums and disposed of a hazardous waste. The floor drains and walls and floors in this room were thoroughly power washed by Envirosafe Personnel.

RCRA Hazardous Waste Storage Tank(s) Closures

In 1984, the facility suspended use of a sub surface 90,000 gallon settling tank and a 6,800 gallon neutralization tank, that were used to treat lead contaminated wastewater, per the RCRA Part B permit. In 1988, the facility completed closure and removal of both tanks and completed the area remediation per USEPA RCRA closure requirements.

Per completion of this action, the facility RCRA Part B permit was also rescinded and the Huguenot facility was not longer subject to TSDR annual reports, fees, or closure cost assurance requirements. The facility remained subject to all NYDEC 'Generator Status' requirements.

Per due diligence facility closure requirements, all documentation regarding the RCRA closure plan development, completion of closure and site remediation activities, and NYDEC and EPA closure approval documentation was reviewed by Walt Kozlowski, Director – EHS during facility closure activities. All required documentation was on file and no further closure activities were warranted. All applicable closure and regulatory approval documentation is located in the Binder and C&D EHS files.

Hazardous Substance Storage Tanks Closure

There were no hazardous substance storage tanks present on site, thus there were no closure requirements.

Underground Storage Tank Closure

There were no underground storage tanks present at the facility at the time of closure, thus there were no closure requirements.

Sanitary Wastewater Septic System Permit Compliance and Permit Transfer to New Owner

The existing sanitary wastewater septic system septic/collection basin will remain in use with the new owner. The facility SPDES permit was rescinded and a NYDEC General

Permit (GP 005001) was applied for and approved by the NYDEC, which allowed for discharge of between 1,000 to 10,000 gallons per day of sanitary wastewater from the facility. This permit was transferred to the new owner of the facility.

The existing sanitary wastewater septic system was cleaned out by a local contractor prior to facility closure activities.

Per NYDEC requirements, C&D retained a consultant (Delaware Engineering, P.C.) who inspected the two (2) septic tanks to confirm that they had a total capacity of less than 10,000 gallons. There are two septic tanks, one with a 1,500 gallon capacity and one with a 3,000 gallon capacity.

Non-PCB Certification of Electrical Transformers

York Environmental Services was retained to sample and analyze the transformer fluid for PCB content per analytical method SW846/EPA. No PCB's were detected.

The analytical test results and accompanying documentation is in the Binder.

8.0 Completed Facility Decontamination Actions

Formation Room (16,000 square feet)

All equipment was removed from the mezzanine area and ground floor. The upper mezzanine walls and floor and lower room walls, floor, sumps, trenches, and overhead duct work were power washed on three separate occasions: immediately after all equipment was removed, after all unused chemicals were removed from the Chemical Storage Room, and after removal of all equipment from the main facility building. All contaminated wash water was collected and pumped into the facility wastewater treatment storage tanks.

Evaporator Room (1,200 square feet)

All (four 2,200 gallon storage tanks) wastewater storage tanks and four evaporators were cleaned out by Envirosafe personnel. The wastewater storage tanks were cut up and disposed of by Envirosafe. The room floors and walls and evaporators were power washed by Vicaretti personnel. All wash water was collected and pumped into the facility wastewater collection tanks.

K-Room (8,000 square feet)

This room had minimal lead exposure from prior production operations. It was used mainly for storage. All equipment was removed and power washed by Vicaretti personnel. The room floor and walls were also power washed by Vicaretti personnel. All wash water was pumped into the facility wastewater collection tanks.

Pasting and Plate Processing Room (12,000 square feet)

All process and production equipment was power washed by Vicaretti personnel. Each piece of cleaned equipment was inspected by C&D or Vicaretti personnel prior to final designation (use at another facility or scrapped). All round duct was removed and staged in this area. Each piece of round duct was power washed in the area designated for equipment cleaning (near the collection sumps for the wastewater collection tanks).

Envirosafe personnel cleaned out lead sediment from all oven and floor trenches and placed the sediment into 55-gallon drums; this material was sent to Revere Smelting for lead recovery.

Vicaretti personnel power washed the room walls and floor on three separate occasions: one after all equipment was washed and removed from this room; once after all oven and floor trenches were cleaned out; and once after all equipment was removed from the entire facility. All supplied air ductwork was also power washed.

All baghouse duct work that was removed from the roof was staged in this room and power washed prior to being scrapped. This room was also used as a staging area for washing of equipment from other plant areas, due to the close proximity of the wastewater collection sumps.

All equipment that was washed in this area was inspected for the absence of visual lead accumulation by C&D or Vicaretti personnel prior to leaving the building.

Grid Casting Room (12,000 square feet)

All equipment was power washed by Vicaretti personnel. The room floor, walls, and overhead supply air ducts were power washed on two occasions by Vicaretti personnel; once after removal of all equipment from the room and once after all equipment was removed from the building.

Remelt Room (1,400 square feet)

All equipment was power washed by Vicaretti personnel. The room floor and walls were power washed on two occasions by Vicaretti; once after all equipment was removed from the room and once after all equipment was removed from the building.

Oxide Mill Room (1,400 square feet)

This room decontamination was completed after all other building areas were cleaned. All equipment was power washed by Vicaretti prior to being cut up and disposed of as scrap. The room floor, walls and ceiling were power washed by Vicaretti personnel. All supplied air duct work was power-washed. All wash water was collected and pumped to the facility wastewater collection tanks.

Warehouse Rooms (35,000 square feet)

After all finished products were removed; the warehouse floor, walls and racks were power washed on two occasions.

Finishing Area

The finishing area was located centrally between the office, warehouse and main production areas. All equipment was power washed by Vicaretti personnel prior to being removed. The room floor and walls was power washed on three separate occasions: once after all equipment was removed; once after all floor drains in the Chemical Storage Room were cleaned out and all chemicals and waste materials were disposed of; and once after all equipment was removed from the facility.

Outside Hazardous Waste Storage Area (2,500 square feet)

The concrete floor, where the drums of acid and other waste chemicals were stored prior to disposal, was power washed by Vicaretti personnel on two occasions after all drums and other plant equipment was removed. All wash water was collected and pumped to the plant wastewater collection system.

Sulfuric Acid Room

The OV and other concentrations of sulfuric acid were pumped to a tanker and disposed of by Envirosafe at the Republic Environmental Services facility in Hatfield, PA. Envirosafe decontaminated and power washed all 8 sulfuric acid and Memtek tanks. All tanks were cut up by Envirosafe personnel and either disposed of as scrap or hazardous waste. All plant hazardous waste (equipment contaminated with lead that could not be power washed off) was collected in placarded and covered hazardous waste run-offs and disposed of at a hazardous waste landfill by Envirosafe personnel. The entire room walls, walking platforms, and floor were power washed by Envirosafe personnel.

Maintenance Shop and Storage Rooms

All equipment was power washed by Vicaretti personnel prior to being sold or scrapped. The shop was power washed by Vicaretti personnel after all equipment was removed.

Building Roof

Two lead oxide storage silos were decontaminated by Vicaretti; all lead oxide was shoveled out and placed in drums where it was recovered at Revere Smelter. The lead oxide conveyors and silos were power washed by Vicaretti prior to being scrapped. The

filter baghouses and duct work were decontaminated by Vicaretti personnel prior to being sent to another facility (the duct work was scrapped).

Heavy tarps and/or plastic sheeting were placed under all cleaned equipment being dismantled for disposal or transfer to another plant. After the equipment was removed from the roof, any dust accumulation on the roof was immediately vacuumed and disposed of by Vicaretti personnel.

Office and other Non-Production Building Areas

All building areas and rooms were inspected for chemicals and other hazardous substances. Envirosafe personnel collected all hazardous chemicals and placed in lab packs prior to disposal at hazardous waste disposal sites.

Chemical Storage Room

Envirosafe personnel cleaned out all trenches and placed the contaminants/slurry into 55 gallon drums. Approximately 35 drums of collected waste sediment were disposed of as hazardous. After the trench cleanout, the room walls and floors were power washed by Vicaretti personnel.

Outside Areas

All stored equipment was sent to other plants or disposed of as scrap. All non-hazardous debris was picked up and placed in non-hazardous roll-offs for disposal.

Fire bricks, that were stored in the outside area, were tested per EPA TCLP criteria and were found to be hazardous. All fire bricks were placed in the hazardous waste roll-offs and disposed of as hazardous by Envirosafe.

After all building interior decontamination was completed, the dirt and sediment adjacent to the exterior filter baghouses and loading docks were scraped up by a front end loader and placed in the hazardous waste roll-offs and disposed of as hazardous. All concrete and blacktop surfaces adjacent to the sulfuric acid storage room, plate processing exit doors, and oxide mill exit doors were power washed with all water diverted to the wastewater collection tanks for disposal. This was done as a precautionary measure to collect any fugitive dust in these areas.

9.0 Facility Environmental Permits

The facility SPDES (Wastewater Discharge) Permit No. NY 009 6938, DEC No. 3-3328-00040/0001 was rescinded per written notification to the NYDEC. A General Permit was obtained from NYDEC for approval to discharge between 1,000 gallons and 10,000 gallons per day of sanitary wastewater from the facility into the septic tanks.

After all hazardous wastes were disposed of, the facility EPA No. NYD064337298 was rescinded per written notification to the Mr. Jack Hoyt, USEPA, Region II, New York, NY 10007.

The Air Emission Approval Permit ID 3-3328-00040/00027 was rescinded per written request to Mr. Robert Stanton, NYDEC Division of Air Resources, Region 3, New Paltz, NY 12561.