

ENGINEERING REPORT

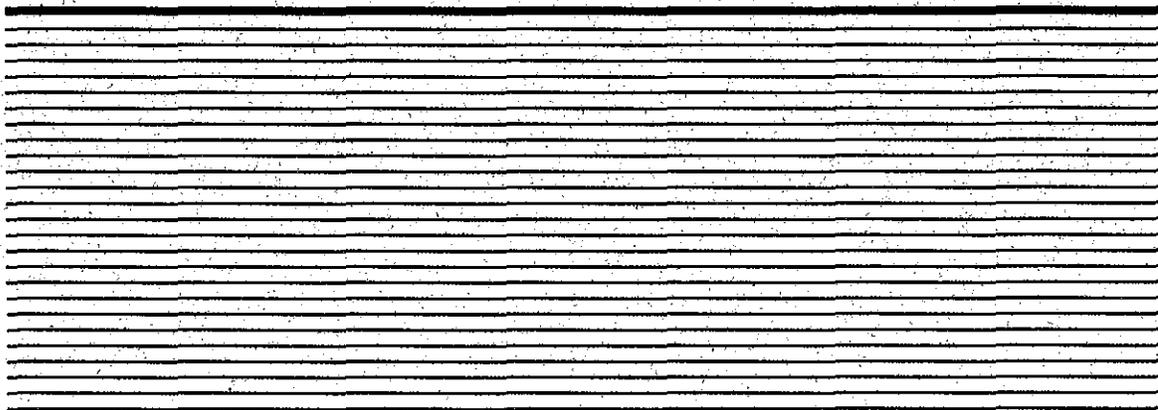
**Phase 1 and Initial Phase 2 Facility
Cleaning Interim Remedial Measures
Former IFG Facility
(Site No. 7-34-057)
Syracuse, NY**

General Motors Corporation
Syracuse, NY

March 2000



O'BRIEN & GERE
ENGINEERS, INC.



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Former IFG Facility (Site No. 7-34-057)

*General Motors Corporation
Syracuse, New York*



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March 2000



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1. Introduction

1.1. Overview

General Motors Corporation (GM) and the New York State Department of Environmental Conservation (NYSDEC) entered into an Order on Consent (Index # D-7-0001-97-06) that became effective upon the execution of the Order by NYSDEC on September 25, 1997 (the "Order"). The Order requires GM, among other things, to perform a Remedial Investigation/Feasibility Study at the Former IFG Facility (the "site"). Paragraph VI of the Order provides for the performance of Interim Remedial Measures (IRMs) at the site.

The Phase 1 and Initial Phase 2 IRMs comprise a portion of the facility cleaning IRM program being conducted by GM to prepare the facility for redevelopment. This report documents implementation of the Phase 1 and Initial Phase 2 facility cleaning IRMs in accordance with the Phase 1 and Initial Phase 2 IRM Work Plans, the Order (including the Redevelopment Addendum (effective November 23, 1999)) and the Stipulation between GM and NYSDEC (effective August 23, 1999). The Stipulation addresses redevelopment of one area of the manufacturing building (Initial Phase 2 IRM area).

The Phase 1 and Initial Phase 2 IRM Work Plans consist of a series of documents and correspondence between GM and NYSDEC, as described in Section 1.4 of this Report. The specific scopes of the Phase 1 and Initial Phase 2 facility cleaning IRMs are described in Section 1.5. Generally, the IRMs consisted of cleaning floors and aboveground surfaces, cleaning and dismantling various process systems, and removing residue from various facility sumps and drains. Floor and aboveground surface cleaning activities were performed to address the presence of polychlorinated biphenyls (PCBs) on these surfaces. For a period of time during facility operations, hydraulic fluids used in the injection molding operations contained PCBs. Portions of the aboveground surfaces and floors were cleaned to a wipe standard of 10 $\mu\text{g}/100 \text{ cm}^2$ during a partial facility cleaning program in 1997.

Phase 1 IRM surface cleaning activities addressed areas of the manufacturing building outside injection molding areas, with the exception of the 700 series and 800 series molder areas. The 700 series

and 800 series molders were operated after 1976 and did not contain PCBs at concentrations greater than 50 parts per million (ppm). PCBs in dust on aboveground surfaces and on floors likely accumulated in these areas as a result of the facility air handling system and floor traffic, and are not attributable to spills of liquid PCBs greater than 50 ppm. Aboveground surfaces addressed by Phase 1 IRM surface cleaning activities in these areas were those which were not cleaned to the 10 $\mu\text{g}/100\text{ cm}^2$ cleanup criterion in 1997.

Certain Phase I IRM activities related to miscellaneous cleaning have not yet been completed. Certification of completion for these activities will be provided in the report for the next phase. These activities include:

- Cleaning of floors in bays A1 through A4
- Removal and containerization of residuals from the paint room sump and emulsion sump
- Draining and powerwashing of the piping and pre-heater from boiler #4 and the remaining powerhouse boiler piping
- Draining, powerwashing, and dismantling of glycol piping (not performed because this piping still useful)
- Draining, powerwashing, and dismantling process piping in mold storage building and between the mold storage building and the manufacturing building

Initial Phase 2 IRM activities addressed one area of the manufacturing building within the injection molding areas, which was identified for a potential tenant. Initial Phase 2 IRM activities included aboveground surface cleaning in areas not cleaned to the 10 $\mu\text{g}/100\text{ cm}^2$ cleanup criterion in 1997, and a combination of surface cleaning and decontamination of floors for reuse in accordance with TSCA regulations, based on concrete floor PCB data.

Following completion of surface cleaning activities in the areas being prepared for leasehold space, GM submitted letters (dated December 14 and 20, 1999) requesting written approval from the Department of cleaning activities in these areas. The Department provided conditional approval of the cleaning activities in these areas in three letters dated January 4, 1999. These letters are included in Exhibit B.

Additional Phase 2 facility cleaning IRM activities are ongoing at the site, and address the remainder of cleaning activities required in the manufacturing building injection molding areas, as well as other buildings at the site. Certification of completion of the additional Phase 2 facility cleaning IRM activities will be provided in a future report.

1.2. Site description

The Former IFG Facility is an approximate 65-acre facility located at 1 General Motors Drive in Syracuse, New York. A site location map is included as Figure 1-1, and a site map is included as Figure 1-2. Plant structures include the approximate 800,000 sq ft manufacturing building, as well as the powerhouse, industrial waste treatment plant (IWTP), mold storage building, rail car building, and other miscellaneous structures and parking lots. The facility is bounded to the south by Conrail railroad tracks and a wood pallet recycling facility, to the east and northeast by GM Circle and Townline Road, to the west by a Niagara Mohawk Power Corporation (NMPC) electrical transfer station, and to the north by Factory Avenue and an undeveloped area adjacent to Ley Creek. The facility is located in an area zoned for industrial use in the Town of Salina; a small portion of the facility (entrance gate area and a portion of the parking lot) is located in the Town of Dewitt.

1.3. Site history

The plant began operations in 1952 as Brown-Lipe-Chapin, a division of GM. Operations conducted at the plant included metal die casting; nickel, chromium, and copper cyanide electroplating; stamping; polishing; buffing; painting; and machining. In 1961, Brown-Lipe-Chapin merged with another GM division, Ternstedt, and subsequently became part of the Fisher Body Division in 1968. During the early 1960's, injection molding operations were added to the existing operations, and metal finishing and die casting were completely replaced by injection molding by the early 1970's. The facility operated as the Fisher Guide Division of GM from 1984 to 1989. The plant then operated as the Inland Fisher Guide division from 1989 until cessation of production operations in December 1993. After the facility ceased manufacturing operations in 1993, the facility was reassigned to GM's North American Operations Property Management Group, which was later redesignated the Worldwide Facilities Group.

1.4. Phase 1 and Initial Phase 2 IRM Work Plans

The NYSDEC has reviewed the following documents (the "Phase 1 IRM Work Plan and Initial Phase 2 IRM Work Plan"), which make up the specifications for this work:

- *Work Plan, Cleaning of the Syracuse Facility*, prepared by Royal Environmental, Inc., May 1999
- *Sampling and Analysis Plan, Cleaning Program Verification, Former Inland Fisher Guide Facility, Syracuse, New York*, prepared by O'Brien & Gere Engineers, Inc., May 1999

- James F. Hartnett's (GM) letters to Susan Benjamin, P.E. (NYSDEC), dated May 5, 1999, May 13, 1999, May 18, 1999, June 15, 1999, and August 5, 1999.

NYSDEC approved the Phase 1 IRM Work Plan in its letters dated May 28, 1999 and June 17, 1999 to James F. Hartnett (GM). NYSDEC approved the Initial Phase 2 IRM Work Plan in its letter dated August 11, 1999 to Mr. Hartnett.

1.5. IRM scope summary

1.5.1. Phase 1 IRM

The areas addressed under the Phase 1 IRM were aboveground steel, wall and floor surfaces in the following manufacturing bays FF (19-24), EE (19-24), DD (14-24), CC (14-24), BB (14-20), AA (14-20, 23-24), A (1-7, 17-24), B (1, 17-24), C (1, 17-24), D (1, 17-24), E (1, 17-24), F (1-2 southeast of wall, 20-24), G (1-2 east of wall, 20-22 north of wall, 23 northwest of wall, 24), H (1-2, 23 west of wall, 24), J (1-2, 23 west of wall, 24), and K (1-2, 23 west of wall, 24). In addition, Phase 1 included the shredder room, exclusive of aboveground steel and walls which were already cleaned during the 1997 cleaning program to satisfy the wipe clean-up criterion of $<10 \mu\text{g}/100 \text{ cm}^2$. The area cleaned during the 1997 cleaning program is depicted on Figure 1-3. Data from the 1997 cleaning program were submitted to NYSDEC in a letter from GM dated April 30, 1999 (Hartnett 1999a).

The following cleaning procedures, which were demonstrated to be effective during the 1997 cleaning program, were identified to be used for aboveground steel, wall, and floor cleaning for the Phase 1 IRM areas:

- Pressure washing of surfaces to remove visible dust and grime with wash waters to be treated at GM's industrial waste treatment plant (IWTP) and discharged in accordance with the SPDES permit in place for the facility, which allows for treatment and discharge of remediation wastewaters
- Visual inspection for clean surfaces by O'Brien & Gere Engineers
- Wipe sampling (one floor/one aboveground steel/one wall per four bays, depending on configuration) by O'Brien & Gere Engineers to confirm attainment of the $<10 \mu\text{g}/100 \text{ cm}^2$ surface PCB cleanup criterion
- Additional pressure washing as needed to attain the visually clean standard or PCB surface cleanup criterion.

The areas cleaned during the Phase I IRM are depicted on Figures 1-3 and 2-1.

Process systems cleaning and removal covered under the Phase 1 IRM included the following piping systems to be drained, powerwashed, and dismantled: spent and virgin emulsion piping, process oil piping (waste oil and clean/reclaim oil), process piping in the mold storage building and between the manufacturing building and the mold storage building, waste solvent piping between the paint mix room and the trestle to the IWTP, glycol piping, and paint line piping. Removal of hangers, rods and other supports was also part of the Phase 1 IRM scope.

Other areas/activities addressed in the Phase 1 IRM included:

- Removal and containerization of residuals from the clean oil transfer station
- Draining, powerwashing, and dismantling of waste oil transfer station equipment
- Powerwashing, dismantling, and scrapping of the emulsion system, consisting of a Hoffman filter, pumps, piping, control panel, platforms, stairs, and other associated equipment
- Removal and containerization of residuals from the paint room sump and emulsion sump
- Powerwashing and dismantling of piping and mixing vessels in the paint mix room
- Removal of residue in the floor drain system located in the powerhouse and cleaning of the sumps, trenches, pits, and piping associated with the system
- Draining and powerwashing of the piping and pre-heater from boiler #4 and the remaining powerhouse boiler piping
- Removal and containerization of residuals from sumps in the mold storage building, powerwashing of the sumps, removal and powerwashing of piping and associated equipment from the sumps, and filling of the sumps with concrete

The areas addressed for process systems cleaning and removal are shown on Figures 2-2 through 2-7. The following sampling procedure was identified for dismantled piping and equipment:

- For PCB-related equipment (equipment and piping that potentially conveyed and/or contained PCB contaminated material), the first three roll-off containers of equipment required internal sampling (wipe tests for PCBs) of three different pieces in three different areas

(for pipe, one sample on each end and one midlength) and one external sample from any piece of equipment. Upon the wipe tests meeting the criterion of $<100 \mu\text{g}/100 \text{ cm}^2$, the remaining roll-off containers which contain PCB-related equipment required three internal samples taken from one piece of PCB-related equipment and one external sample from any piece

- Roll-off containers containing non-PCB related equipment required one external wipe sample from any piece of equipment

Asbestos abatement performed at the site was not included in the Phase 1 IRM scope because a letter from the NYSDEC dated December 22, 1998 (NYSDEC, 1998a) stated that asbestos abatement procedures were addressed by regulatory programs other than those enforced by NYSDEC.

1.5.2. Initial Phase 2 IRM

The Initial Phase 2 IRM covered bays G20-23 (south of wall), H13-22, 23 (east of wall), J13-22, 23 (east of wall), and K13-22, 23 (east of wall). As depicted on Figure 1-3, the aboveground steel and walls contained in this area, with the exception of H13, were cleaned during the 1997 facility cleaning program to a PCB wipe criterion of $<10 \mu\text{g}/100 \text{ cm}^2$. Data from the 1997 cleaning program were submitted to NYSDEC in a letter from GM dated April 30, 1999 (Hartnett 1999a).

With the exception of the floor in the vicinity of molders #518 and 519 (bays H13-14), the surface cleaning approach described in Section 1.5.1 for the Phase 1 IRM was identified for the floors in the Phase 2 IRM area, based on floor characterization data. Floor characterization data for this area were submitted to NYSDEC in a letter from GM dated August 5, 1999 (Hartnett 1999f).

Surface cleaning was not identified as appropriate for the floors in bays H13-14, because the sample data collected in the vicinity of molders #518 and 519 indicated the presence of elevated PCBs in the concrete floor to a depth of at least 1.5 inches. Decontamination for reuse in accordance with TSCA regulations in 40 CFR 761.30(p) was identified as the appropriate floor cleaning approach for bays H13-14. The regulations require application of a double wash rinse procedure to accessible surfaces, 24-hour drying, and covering of the surface to prevent release of PCBs with either two solvent and water repellent coatings of contrasting colors, or a barrier fastened to the surface. These regulations also require marking the surface to clearly indicate the presence of PCBs. USEPA allowed for the option of placing a diagram on the wall in the encapsulated floor area, which includes the TSCA-required marking and a depiction of the encapsulated area. The areas addressed during the Initial Phase 2 are depicted on Figures 1-4 and 2-1.

2. IRM implementation/construction

2.1. Phase 1 IRM

2.1.1. Floor surface cleaning

Floor surface cleaning work covered under the Phase 1 IRM was completed between June 22, 1999 and September 29, 1999, in accordance with the Phase 1 IRM Work Plan. Verification sampling of the floor surfaces during the implementation of the Phase 1 IRM was completed between June 23, 1999 and September 30, 1999, in accordance with the O'Brien and Gere Engineers May 1999 Sampling and Analysis Plan (O'Brien & Gere 1999). Wipe samples were analyzed for PCBs using USEPA Method 8082. Quality control field blank samples were collected at a frequency of one per twenty environmental wipe samples. If a surface failed a visual inspection, the contractor was required to reclean the surface. Following attainment of the visually clean standard, verification floor wipe samples were collected at a frequency of one per four decontaminated bays.

Areas that did not attain the cleanup criterion of $<10 \mu\text{g}/100 \text{ cm}^2$ were rewashed until subsequent verification wipe samples indicated attainment of cleanup criterion. For one bay grouping (*i.e.*, A17, A18, A19, A20), the floor surface did not attain the criterion after two washings. Per the Phase 1 IRM Work Plan, O'Brien & Gere discussed further cleaning with NYSDEC. Susan Benjamin of NYSDEC verbally approved that the floor could be recleaned two more times, after which the criterion was attained.

Cleaning of the floor in bays A1 through A4 has not been completed to date. Certification of completion of cleaning in this area will be included in the certification report for the next phase.

Figure 2-1 depicts the sample locations and areas cleaned under the Phase 1 IRM. Table 2-1 contains a summary of verification wipe sample data. Laboratory analytical data reports were submitted to NYSDEC from O'Brien & Gere Engineers on a monthly basis for the verification sampling.

2.1.2. Aboveground surface cleaning

Aboveground surface cleaning work covered under the Phase 1 IRM was completed between July 26, 1999 and September 1, 1999, in accordance with the Phase 1 IRM Work Plan.

Verification sampling of the aboveground surfaces during the implementation of the Phase 1 IRM was completed between August 3, 1999 and September 1, 1999, in accordance with the O'Brien and Gere Engineers May 1999 Sampling and Analysis Plan (O'Brien & Gere 1999). Wipe samples were analyzed for PCBs using USEPA Method 8082. Quality control field blank samples were collected at a frequency of one per twenty environmental wipe samples. If a surface failed a visual inspection, the contractor was required to re-clean the surface. Following attainment of the visually clean standard, verification wipe samples were collected at a frequency of one aboveground steel per four decontaminated bays, and four-bay groupings that included a wall surface also required one wall sample. Verification wipe samples confirmed attainment of the $<10 \mu\text{g}/100 \text{ cm}^2$ criterion during the Phase 1 IRM, and no re-cleaning of aboveground surfaces was required.

It should be noted that verification sampling of the HVAC system in the manufacturing building was completed during the 1997 cleaning project, with the exception of the high bay area. The high bay area was included in the Phase 1 IRM work, and it is located in the northwestern section (building addition) of the main manufacturing plant. Two wipe samples were taken in this area to test the HVAC system for the presence of PCBs, following the wipe sample procedures outlined in the O'Brien and Gere Engineers May 1999 Sampling and Analysis Plan (O'Brien & Gere 1999). Sample data confirmed that PCB wipe concentrations were less than detectable.

The sample locations and areas cleaned under the Phase 1 IRM are presented on Figure 1-3. Table 2-1 contains a summary of verification wipe sample data. Laboratory analytical data reports were submitted to NYSDEC from O'Brien & Gere Engineers on a monthly basis for the verification sampling.

2.1.3. Pipe removal/decontamination

Process systems removal covered under the Phase 1 IRM, as described in Section 1.5.1., was performed between June 25, 1999 and September 23, 1999 in accordance with the Phase 1 IRM Work Plan, with the exception of the process piping in the Mold Storage Building, the process piping between the Mold Storage Building and the manufacturing plant, and the glycol piping. The process systems associated with the Mold Storage Building will be completed during the next phase of the facility cleaning. The glycol piping was left in service because it is still being used to convey IRM cleaning water to the IWTP.

Decontamination of the removed piping was completed on September 29, 1999. Piping and equipment were removed, drained, and decontaminated using pressure washing then transported for off-site smelting. Additional process system piping located in the pipe trestle connecting the manufacturing plant to the IWTP and continuing to the

IWTP, as shown on Figure 2-4, was removed between August 5, 1999 and August 16, 1999, in accordance with procedures outlined in the Phase 1 IRM Work Plan. Management of residual material drained from the process systems is described in Section 3.

Dismantled piping and equipment was sampled between July 15, 1999 and November 8, 1999, in accordance with the procedure and frequency outlined in Section 1.5.1. Wipe samples were analyzed for PCBs using USEPA Method 8082. Quality control field blank samples were collected at a frequency of one per twenty environmental wipe samples. Verification wipe samples confirmed attainment of the 100 µg/100 cm² criterion during the Phase 1 IRM.

Figures 2-2, 2-3, 2-4, and 2-5 delineate the piping and equipment dismantled under the Phase 1 IRM. Table 2-2 contains a summary of verification wipe sample data. Laboratory analytical data reports were submitted to NYSDEC from O'Brien & Gere Engineers on a monthly basis for the verification sampling.

2.1.4. Miscellaneous cleaning tasks

Other Phase 1 IRM work discussed in Section 1.5.1. of the report was completed between July 20, 1999 and November 11, 1999 in accordance with the Phase 1 IRM Work Plan. This work included:

- Removal and containerization of residuals from the clean oil transfer station
- Draining, powerwashing, and dismantling of waste oil transfer station equipment
- Powerwashing, dismantling, and scrapping of the emulsion system, consisting of a Hoffman filter, pumps, piping, control panel, platforms, stairs, and other associated equipment
- Powerwashing and dismantling of piping and mixing vessels in the paint mix room
- Removal of residue in the floor drain system located in the powerhouse and cleaning of the sumps, trenches, pits, and piping associated with the system
- Removal and containerization of residuals from sumps in the mold storage building, powerwashing of the sumps, removal and powerwashing of any piping and associated equipment from the sumps, and filling of the sumps with concrete

Management of residual materials is discussed in Section 3. The layout of the powerhouse floor drain system is shown on Figure 2-6. The sumps

in the mold storage building, which were cleaned and filled in with concrete, are shown on Figure 2-7.

As of February 15, 2000, the following Phase I IRM tasks remain to be completed:

- Cleaning of floors in bays A1 through A4.
- Removal and containerization of residuals from the paint room sump and emulsion sump
- Draining and powerwashing of the piping and pre-heater from boiler #4 and the remaining powerhouse boiler piping
- Draining, powerwashing, and dismantling of glycol piping (not performed because this piping still useful)
- Draining, powerwashing, and dismantling process piping in mold storage building and between the mold storage building and the manufacturing building

Certification of completion of these tasks will be included in the certification report for the remaining Phase 2 activities.

2.2. Initial Phase 2 IRM

2.2.1. Floor surface cleaning

Floor surface cleaning in the bays identified in Section 1.5.2. was implemented between July 26, 1999 and September 30, 1999, in accordance with the Initial Phase 2 IRM Work Plan. For the floors which were surface cleaned, verification sampling was completed between July 27, 1999 and October 4, 1999, in accordance with the O'Brien and Gere Engineers May 1999 Sampling and Analysis Plan (O'Brien & Gere 1999). Wipe samples were analyzed for PCBs using USEPA Method 8082. Quality control field blank samples were collected at a frequency of one per twenty environmental wipe samples. If a surface failed a visual inspection, the contractor was required to re-clean the surface. Following attainment of the visually clean standard, verification floor wipe samples were collected at a frequency of one per four decontaminated bays.

Areas that did not attain the cleanup criterion of $10 \mu\text{g}/100 \text{ cm}^2$ were rewashed until subsequent verification wipe samples indicated that the cleanup criterion was achieved. For one bay grouping (*i.e.*, K14, K15, K16, 1/2K13, 1/2J13), the floor surface did not attain the criterion after two washings. Per the Initial Phase 2 IRM Work Plan, O'Brien & Gere discussed further cleaning with NYSDEC. Susan Benjamin of

NYSDEC verbally approved that the floor could be recleaned two more times, after which the criterion was attained.

Figure 2-1 depicts the sample locations and areas cleaned under the Initial Phase 2 IRM. Table 2-1 contains a summary of verification wipe sample data. Laboratory analytical data reports were submitted to NYSDEC on a monthly basis for the verification sampling.

2.2.2. Floor decontamination for reuse

The floors in bay H14 were decontaminated for reuse on September 2, 1999 and September 7, 1999, in accordance with TSCA regulations in 40 CFR 761.30(p). The floor in the eastern half of bay H13 was not addressed during the Initial Phase 2 IRM because it was outside of the location of a demising wall to be constructed to isolate the tenant space.

The process implemented involved application of a double wash rinse procedure to accessible surfaces, 24-hour drying, and covering of the surface to prevent release of PCBs with two solvent and water repellent coatings of contrasting colors. The coatings applied were Shelby Epoxy Coatings in contrasting shades of grey. Specifically, the Shelby 700 Series Coating was applied as the primer, and the 400 Series Coating was applied as the top coat. Shelby Epoxy Coating product information was submitted to NYSDEC by GM in a letter dated September 8, 1999 (Hartnett 1999g).

A sign depicting the area encapsulated, as well as the required TSCA PCB mark, was hung on the wall in the vicinity of the encapsulated area on December 17, 1999.

Figure 2-1 depicts the floor area which was decontaminated for reuse in accordance with 40 CFR 761.30(p).

2.2.3. Aboveground surface cleaning

The overhead steel cleaning of the bays associated with the Initial Phase 2 IRM was completed during the 1997 cleaning project, with the exception of bay H13. The overhead steel located in bay H13 was cleaned September 7, 1999 and September 8, 1999, in accordance with the Initial Phase 2 IRM Work Plan, using the procedures identified in Section 1.5.1. Verification sampling of the overhead steel in this bay was conducted on September 8, 1999, in accordance with the O'Brien & Gere Engineers May 1999 Sampling and Analysis Plan (O'Brien & Gere 1999). The one wipe sample collected was analyzed for PCBs using USEPA Method 8082, and confirmed attainment of the $<10 \mu\text{g}/100 \text{ cm}^2$ criterion.

The sample location is indicated on Figure 1-3, and the sample data are presented in Table 2-1. Laboratory analytical data were submitted to

NYSDEC from O'Brien & Gere Engineers on a monthly basis for the verification sampling.

[The body of the document contains several paragraphs of text that are extremely faint and illegible due to low contrast and poor scan quality. The text appears to be a formal letter or report detailing the verification sampling process.]

3. Material management

3.1. Construction water

Construction waters generated during the Phase 1 IRM and Initial Phase 2 IRM were collected using vacuum equipment and transferred to the on-site IWTP for treatment. Solids contained in the construction waters were allowed to settle out in an IWTP clarifier before further water treatment. These solids will be removed and disposed of in accordance with applicable regulations when the remainder of the Phase 2 facility cleaning IRM is complete. An estimated 60,000 – 70,000 gallons of construction waters were generated and treated during the Phase 1 IRM and Initial Phase 2 IRM.

3.2. Piping and equipment

Decontaminated piping and equipment generated during the Phase 1 IRM and Initial Phase 2 IRM were collected in roll-offs on-site. Piping equipment which was used in a PCB-related process was segregated from other piping/equipment. Following verification of attainment of the 100 $\mu\text{g}/100 \text{ cm}^2$ criterion, roll-offs containing piping/equipment were transported off-site to be smelted.

3.3. Pipe/equipment and sump/trench contents

Residuals generated from draining of process equipment and removal of materials from sumps, as well as sludge, generated from the piping/equipment decontamination process, were containerized in 55-gallon drums, segregated by waste stream. Each type of material was characterized for disposal based on disposal facility requirements, profiled for disposal, and disposed of in accordance with applicable regulations. A summary of materials generated for disposal during the Phase 1 and Initial Phase 2 IRMs is presented in Table 3-1. A summary of disposal characterization data is presented in Table 3-2. Manifest documentation is presented as Exhibit A.

4. Engineering certification

The on-site observation of the Phase 1 and Initial Phase 2 IRM work was performed 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, I hereby certify that the Phase 1 (with the exception of the tasks identified in Section 1.1) and Initial Phase 2 IRM work has been completed in accordance with the Phase 1 IRM Work Plan, the Initial Phase 2 IRM Work Plan, the Order, the Stipulation, applicable statutes and regulations, and generally accepted technical and scientific principles.

References

Benjamin, 1998. Letter to Jim Hartnett of GM from Susan Benjamin approving 1998 GM Bid Documents and Cleaning Specifications. December 22, 1998.

Benjamin, 1999a. Letter to Jim Hartnett of GM Susan Benjamin of NYSDEC approving April 30, 1999 cleaning approach letter. May 13, 1999.

Benjamin, 1999b. Fax to Jim Hartnett of GM from Susan Benjamin discussing comments on the Phase 1 IRM Plans. May 17, 1999.

Benjamin, 1999c. Letter to Jim Hartnett of GM from Susan Benjamin of NYSDEC responding to GM's August 5, 1999 letter. August 11, 1999.

GM, 1998. Bid Documents and Cleaning Specifications, 1998.

Hartnett, 1999a. Letter to Susan Benjamin of NYSDEC from Jim Hartnett of GM proposing surface cleaning approach. April 30, 1999.

Hartnett, 1999b. Letter to Susan Benjamin of NYSDEC from Jim Hartnett of GM submitting Royal Environmental Work Plan and O'Brien & Gere Engineers, Inc. Sampling and Analysis Plan. May 5, 1999.

Hartnett, 1999c. Letter to Susan Benjamin of NYSDEC from Jim Hartnett of GM discussing revisions to the IRM Plans. May 13, 1999.

Hartnett, 1999d. Letter to Susan Benjamin of NYSDEC from Jim Hartnett providing responses to the NYSDEC May 17, 1999 fax. May 18, 1999.

Hartnett, 1999e. Letter to Donald Hessler of NYSDEC from Jim Hartnett providing responses to comments in NYSDEC letter dated May 28, 1999.

Hartnett 1999f. Letter to Susan Benjamin of NYSDEC from Jim Hartnett of GM proposing Initial Phase 2 IRM work. August 5, 1999.

Hartnett 1999g. Letter to Susan Benjamin of NYSDEC from Jim Hartnett of GM discussing Initial Phase 2 IRM work. September 8, 1999.

Hesler, 1999a. Letter to Jim Hartnett of GM from Donald Hesler of NYSDEC providing comments on the Phase 1 IRM plans. May 28, 1999.

Hesler, 1999b. Letter to Jim Hartnett of GM from Donald Hesler of NYSDEC responding to GM's June 16, 1999 letter. June 17, 1999.

OBG, 1999. Cleaning Program Verification Sampling and Analysis Plan. May 1999.

Royal Environmental, 1999. Cleaning of the Syracuse Facility Work Plan. May 1999.

Stoller, 1999a. Letter to Jim Hartnett of GM from Kenneth Stoller of USEPA approving April 30, 1999 cleaning approach letter. May 14, 1999.

Stoller, 1999b. Letter to Jim Hartnett of GM from Kenneth Stoller of USEPA approving August 5, 1999 letter proposing Initial Phase 2 IRM work. August 13, 1999.

**Table 2-1
Former IFG Facility
Facility Cleaning IRM
Floor and Aboveground Surfaces
Verification Wipe Sample Data**

Date	Sample ID	Surface Sampled	Bays or Materials Represented by Sample	Detected Aroclor Conc.* (ug/100 sq. cm)	Aroclor Identified
06/23/99	D1-F1	floor	B1, C1, D1, E1	27	1248 **
06/24/99	G1-F1	floor	F1, F2, G1, G2	9.8	1248 **
06/28/99	C1-F1 (Resample of D1-F1)	floor	B1, C1, D1, E1	9.4	1248
06/29/99	H1-F1	floor	H1, H2, J1	7.8	1248 **
06/29/99	K2-F1	floor	J2, K1, K2	7.2	1248 **
06/30/99	B18-F1	floor	B17, B18, C17, C18	ND	
06/30/99	Field Blank	blank	--	ND	
07/06/99	E18-F1	floor	E17, E18, E19, D19	19	1248 **
07/06/99	F21-F1	floor	F20, F21, G20, G21	7	1248 **
07/07/99	E21-F1	floor	D20, D21, E20, E21	ND	
07/08/99	C20-F1	floor	B19, B20, C19, C20	7	1248
07/13/99	A18-F1	floor	A17, A18, A19, A20	15	1248 **
07/13/99	Shredder Room - F1	floor	shredder room	66	1248 **
07/13/99	Shredder Room - W1	wall	shredder room	ND	
07/15/99	C24-F1	floor	B24, C24, D24, E24	7.1	1248 **
07/20/99	F23-F1	floor	F23, F24, G23, G24	17	1248 **
07/21/99	D23-F1	floor	C23, D23, E23	ND	
07/22/99	E19-F1 (Resample of E18-F1)	floor	E17, E18, E19, D19	ND	
07/22/99	A19-F1 (Resample of A18-F1)	floor	A17, A18, A19, A20	14	1254 **
07/22/99	H24-F1	floor	H23, H24, J24	ND	
07/22/99	K23-F1	floor	J23, K23, K24	ND	
07/26/99	G23-F1 (Resample of F23-F1)	floor	F23, F24, G23, G24	ND	
07/27/99	Field Blank 2	blank	--	ND	
07/27/99	H23-F1	floor	G23, H23, J23	ND	
07/29/99	B23-F1	floor	B22, B23, A22, A23	10	1254 **
07/29/99	C21-F1	floor	A21, B21, C21, C22	6.2	1254 **
07/30/99	F22-F1	floor	D22, E22, F22, G22	7.9	1254 **
08/02/99	H21-F1	floor	H21, H22, H20, (1/3 of G20, G21, G22)	ND	
08/03/99	EE24-AS1	overhead steel	DD24, EE24, FF24	ND	

**Table 2-1
Former IFG Facility
Facility Cleaning IRM
Floor and Aboveground Surfaces
Verification Wipe Sample Data**

Date	Sample ID	Surface Sampled	Bays or Materials Represented by Sample	Detected Aroclor Conc.* (ug/100 sq. cm)	Aroclor Identified
08/03/99	DD24-W1	wall	DD24, EE24, FF24	ND	
08/03/99	CC23-AS1	overhead steel	CC23, CC24, DD23	ND	
08/03/99	CC24-W1	wall	CC23, CC24, DD23	ND	
08/03/99	CC22-W1	wall	CC21, CC22, DD21, DD22	ND	
08/03/99	DD22-AS1	overhead steel	CC21, CC22, DD21, DD22	ND	
08/04/99	B22-F1 (Resample of B23-F1)	floor	A22, A23, B22, B23	7.4	1248
08/05/99	A19-F2 (Resample of A19-F1)	floor	A17, A18, A19, A20	18.0	1248**
08/05/99	Field blank 3	blank	--	ND	
08/06/99	FF19-AS1	overhead steel	FF19, FF20, FF21	ND	
08/06/99	FF21-W1	wall	FF19, FF20, FF21	ND	
08/06/99	EE20-AS1	overhead steel	EE19, EE20, EE21	ND	
08/06/99	EE19-W1	wall	EE19, EE20, EE21	6.8	1248**
08/09/99	CC18-AS1	overhead steel	CC17, CC18, DD17, DD18	ND	
08/09/99	CC17-W1	wall	CC17, CC18, DD17, DD18	ND	
08/09/99	EE24-F1	floor	DD24, EE24, FF24	ND	
08/11/99	FF23-AS1	overhead steel	EE23, FF23	ND	
08/11/99	EE23-W1	wall	EE23, FF23	ND	
08/11/99	EE22-AS1	overhead steel	EE21, EE22, FF21, FF22	ND	
08/11/99	EE21-W1	wall	EE21, EE22, FF21, FF22	ND	
08/11/99	CC20-AS1	overhead steel	CC19, CC20, DD19, DD20	ND	
08/16/99	AA19-AS1	overhead steel	AA19, AA20, BB19, BB20	ND	
08/16/99	BB20-W1	wall	AA19, AA20, BB19, BB20	ND	
08/16/99	BB17-AS1	overhead steel	AA17, AA18, BB17, BB18	ND	
08/16/99	AA18-W1	wall	AA17, AA18, BB17, BB18	ND	
08/16/99	FF23-F1	floor	EE23, FF23	ND	
08/16/99	EE22-F1	floor	EE21, EE22, FF21, FF22	ND	
08/17/99	J20-F1	floor	J19, J20, J21, J22	6.8	1248
08/17/99	Field blank 4	blank	--	ND	
08/19/99	K21-F1	floor	K20, K21, K22, K23	ND	
08/20/99	K18-F1	floor	K17, K18, K19	9.6	1248**

**Table 2-1
Former IFG Facility
Facility Cleaning IRM
Floor and Aboveground Surfaces
Verification Wipe Sample Data**

Date	Sample ID	Surface Sampled	Bays or Materials Represented by Sample	Detected Aroclor Conc.* (ug/100 sq. cm)	Aroclor Identified
08/23/99	DD15-AS1	overhead steel	CC14, CC15, DD14, DD15	ND	
08/23/99	DD14-W1	wall	CC14, CC15, DD14, DD15	ND	
08/25/99	A18-F2 (Resample of A19-F2)	floor	A17, A18, A19, A20	7.1	1248**
08/27/99	CC23-F1	floor	CC23, CC24, DD23	ND	
08/27/99	DD21-F1	floor	CC21, CC22, DD21, DD22	ND	
08/31/99	FF20-F1	floor	FF19, FF20, FF21	ND	
08/31/99	EE19-F1	floor	EE19, EE20, EE21	ND	
09/01/99	Field blank 5	blank	—	ND	
09/01/99	AA14-W1	wall	AA14, AA15, BB14, BB15	ND	
09/01/99	BB15-AS1	overhead steel	AA14, AA15, BB14, BB15	ND	
09/01/99	BB16-W1	wall	AA16, BB16, CC16, DD16	ND	
09/01/99	CC16-AS1	overhead steel	AA16, BB16, CC16, DD16	ND	
09/03/99	H16-F1	floor	H17, H16, J17, J16	ND	
09/03/99	H15-F1	floor	H15, J15, J14	6.2	1248
09/03/99	H18-F1	floor	H19, H18, J18	ND	
09/08/99	H13-AS1	overhead steel	H13	ND	
09/08/99	K15-F1	floor	K14, K15, K16, (1/2) K13, (1/2) J13	15	1248**
09/13/99	CC20-F1	floor	CC19, CC20, DD19, DD20	ND	
09/13/99	CC18-F1	floor	CC17, CC18, DD17, DD18	ND	
09/14/99	K15-F2 (Resample of K15-F1)	floor	K14, K15, K16, (1/2) K13, (1/2) J13	45	1248**
09/16/99	AA20-F1	floor	AA19, AA20, BB19, BB20	ND	
09/16/99	AA18-F1	floor	AA17, AA18, BB17, BB18	ND	
09/21/99	K15-F3 (Resample of K15-F2)	floor	K14, K15, K16, (1/2) K13, (1/2) J13	12	1248
09/21/99	Field Blank -6	blank	—	ND	
09/27/99	DD14-F1	floor	CC14, CC15, DD14, DD15	ND	
09/29/99	CC16-F1	floor	AA16, BB16, CC16, DD16	ND	
09/30/99	AA15-F1	floor	AA14, AA15, BB14, BB15	ND	
09/30/99	Shredder Room -F2	floor	shredder room	39	1248

Table 2-1
Former IFG Facility
Facility Cleaning IRM
Floor and Aboveground Surfaces
Verification Wipe Sample Data

Date	Sample ID	Surface Sampled	Bays or Materials Represented by Sample	Detected Aroclor Conc.* (ug/100 sq. cm)	Aroclor Identified
10/04/99	K15-F4 (Resample of K15-F3)	floor	K14, K15, K16, (1/2) K13, (1/2) J13	6.9	1248
10/07/99	Shredder Room -F3	floor	shredder room	7.6	1248
10/26/99	F2-AS1	overhead steel	E2, F2, G2, G3	ND	
10/26/99	G2-W1	wall	E2, F2, G2	ND	
11/03/99	F2-F1	floor	E2, F2, G2, H2	22	1248
11/08/99	A2-F1	aisle floor	A1, A2, A3, A4 (aisles)	24	1248**
11/08/99	A6-F1	aisle floor	A5, A6, A7, A8 (aisles)	7.1	1248**
1/10/00	A2-F2 (Resample of A2-F1)	floor	A1, A2, A3, A4	16	1248
1/10/00	A7-F1	floor	A5, A6, A7, A8	7.5	1248
1/14/00	C7-AS1 (Resample of C8-AS1)	overhead steel	B7, B8, C7, C8	6	1248

Notes:

* Other Aroclors less than detectable.

** Altered Aroclor.

ND - not detected; detection limits 5.0 ug/100 sq cm for each aroclor.

**Table 2-2
Former IFG Facility
Facility Cleaning IRM
Pipe & Equipment
Verification Wipe Sample Data**

Date	Sample ID	Surface Sampled	Bays or Materials Represented by Sample	Detected Aroclor Conc.* (ug/100 sq. cm)	Aroclor Identified
07/15/99	VAT-1	non-PCB related equipment	1st Roll-Off	ND	
07/15/99	Paint Pipe - 1	non-PCB related equipment	2nd Roll-Off	ND	
07/20/99	VAT-2	non-PCB related equipment	3rd Roll-Off	ND	
07/21/99	VAT-3	non-PCB related equipment	4th Roll-Off	6.2	1254 **
08/03/99	WOPI-1	waste oil piping-interior	7th Roll-off	ND	
08/03/99	WOPI-2	waste oil piping-interior	7th Roll-off	ND	
08/03/99	WOPI-3	waste oil piping-interior	7th Roll-off	ND	
08/03/99	WOPE-1	waste oil piping-exterior	7th Roll-off	9.0	1248**
08/04/99	WOPI-4	waste oil piping-interior	7th Roll-off	ND	
08/04/99	WOPI-5	waste oil piping-interior	7th Roll-off	ND	
08/04/99	WOPI-6	waste oil piping-interior	7th Roll-off	ND	
08/04/99	WOPI-7	waste oil piping-interior	7th Roll-off	ND	
08/04/99	WOPI-8	waste oil piping-interior	7th Roll-off	ND	
08/04/99	WOPI-9	waste oil piping-interior	7th Roll-off	ND	
08/06/99	Duct - 1	non-PCB related equipment	5th Roll-off	ND	
08/19/99	HV-15CC	HVAC	High Bay Area	ND	
08/23/99	BB17-HV1	HVAC	High Bay Area	ND	
08/24/99	Short steel	non-PCB related equipment	6th Roll-off	ND	
08/24/99	I-beam	non-PCB related equipment	Roll-off (still on-site)	ND	
08/24/99	Buss Duct	non-PCB related equipment	8th Roll-off	ND	
09/02/99	Paint pipe -2	non-PCB related equipment	9th Roll-off	ND	
09/02/99	Paint pipe -3	non-PCB related equipment	10th Roll-off	ND	
09/08/99	Paint pipe -4	non-PCB related equipment	11th Roll-off	ND	
09/15/99	Paint pipe - 5	non-PCB related equipment	12th Roll-off	ND	
09/20/99	Paint pipe -6	non-PCB related equipment	13th Roll-off	ND	

Table 2-2
Former IFG Facility
Facility Cleaning IRM
Pipe & Equipment
Verification Wipe Sample Data

Date	Sample ID	Surface Sampled	Bays or Materials Represented by Sample	Detected Aroclor Conc.* (ug/100 sq. cm)	Aroclor Identified
09/29/99	Paint pipe -7	non-PCB related equipment	14th Roll-off	ND	
10/19/99	Air Handler-1	non-PCB related equipment	15th Roll-off	ND	
11/08/99	DUCT-2	duct	16th Roll-off	ND	

* Other Aroclors less than detectable.

** Altered Aroclor.

ND - not detected; detection limits 5.0 ug/100 sq cm for each aroclor.

Table 3-1
 GM Syracuse - Facility Cleaning Program and Supplemental Remedial Investigation
 Phase 1 IRM and Initial Phase 2 IRM - Material Characterization/Disposal

Material	Container	Quantity	Characterization required by disposal facility	Characterization status	Results	Profile Status
Supplemental remedial investigation						
Used oil/waste oil	Drums	10 drums	1 representative sample – PCBs, RCRA characteristics*	Sampled 8/9/99	Non-TSCA (PCBs 3.8 mg/kg) RCRA non-haz	Approved profile LM 99-0607; 4070 contract; GM PCB sign-off obtained; picked up for disposal 11/11/99
Clean oil	Drums	2 drums	1 representative sample – PCBs, RCRA characteristics*	Sampled 8/9/99	Non-TSCA (PCBs 4.6 mg/kg) RCRA non-haz	Approved profile LM 99-0607; 4070 contract; GM PCB sign-off obtained; picked up for disposal 11/11/99
Virgin emulsion oil (< 1/2 water)	Drums Accumulation start date: 8/25/99 (receipt of data)	3 drums	1 representative sample – PCBs, RCRA characteristics*	Sampled 8/9/99	Non-TSCA (PCBs 1.3 mg/kg) RCRA Haz: D039 (PCE), D040 (TCE)	Approved profile 2183000; GM PCB sign-off obtained; picked up for disposal 11/11/99
Spent emulsion oil (< 1/2 water)	Drums Accumulation start date: 8/25/99 (receipt of data)	2 drums	1 representative sample – PCBs, RCRA characteristics*	Sampled 8/9/99	Non-TSCA (PCBs 2.8 mg/kg) RCRA Haz: D039 (PCE)	Approved profile 2183000; GM PCB sign-off obtained; picked up for disposal 11/11/99
Waste solvent (>70% water)	Drums Accumulation start date: 9/13/99 (receipt of data)	1 drum	1 representative sample – VOCs, RCRA characteristics*	Sampled 8/19/99	RCRA haz waste: D001 (24°C flash); D035 (MEK) Totals: toluene 240 ppm; xylene 42 ppm; ethylbenzene 8.4 ppm	Approved profile 2182982; 3517 contract; picked up for disposal 11/11/99

Table 3-1

GM Syracuse - Facility Cleaning Program and Supplemental Remedial Investigation
Phase 1 IRM and Initial Phase 2 IRM - Material Characterization/Disposal

Material	Container	Quantity	Characterization required by disposal facility	Characterization status	Results	Profile Status
Pipe cleaning decon sludge	Drums Accumulation start date: 11/24/99 (receipt of data) 90-day limit: 2/22/00	3 drums	1 representative sample – VOCs, PCBs, RCRA characteristics	Sampled 10/25/99	RCRA haz waste: D026 Totals: 2-methylphenol (o-cresol) 100 ppm; (3+4)-methylphenol (m+p-cresol) 230 ppm; toluene 7100 mg/kg; ethylbenzene 1100 mg/kg; xylene 5000 mg/kg; n-propylbenzene 180 mg/kg; 1,3,5-trimethylbenzene 390 mg/kg; n-butylbenzene 210 mg/kg; 1,2,4-trimethylbenzene 1300 mg/kg; naphthalene 610 mg/kg PCBs 20 mg/kg (to be managed as TSCA and B007 waste)	Approved profile AP31311295; 3517 contract; picked up for disposal 2/16/00
Mold storage sump contents	Drums	1 drum	1 representative sample – VOCs, RCRA characteristics*	Sampled 10/14/99	RCRA non-haz (characteristic); Totals: toluene 1800 mg/kg; xylene 1100 mg/kg; ethylbenzene 230 mg/kg; n-propylbenzene 29 mg/kg; 1,3,5 trimethylbenzene 43 mg/kg; n-butylbenzene 12 mg/kg; 1,2,4-trimethylbenzene 150 mg/kg; isopropylbenzene 11 mg/kg; naphthalene 58 mg/kg	Profiled and approved. Picked up for disposal 1/24/00
PPE, poly sheeting	TSCA roll-off	1 roll-off	None	NA	NA	Included on TSCA Profile GB-92-0408

Table 3-1
 GM Syracuse - Facility Cleaning Program and Supplemental Remedial Investigation
 Phase 1 IRM and Initial Phase 2 IRM - Material Characterization/Disposal

Material	Container	Quantity	Characterization required by disposal facility	Characterization status	Results	Profile Status
Wood	TSCA roll-off	2/3 roll-off	1 representative sample – PCBs, RCRA characteristics*	Sampled 7/30/99	PCBs 1.4 mg/kg (to be managed as TSCA and B007 haz waste)	Included on TSCA Profile GB-92-0408
Paint chips/dust	TSCA roll-off	1/2 roll-off	1 representative sample – PCBs, RCRA characteristics*	Sampled 7/30/99	TSCA waste/B007 haz waste (PCBs 250 mg/kg)	Included on TSCA Profile GB-92-0408
Trench fly ash (1 drum mainly water; others solid)	Drums	11 drums	1 representative sample – PCBs, RCRA characteristics*	Sampled 10/25/99	RCRA non-haz (characteristic) Non-TSCA (PCBs 1.7 mg/kg)	Profiled and approved. Picked up for disposal 1/24/00.
Mercury switches	Drums Accumulation start date: 8/25/99	2 drums	None	NA	NA	Approved profile 2182981; picked up for disposal 11/11/99

Table 3-1
 GM Syracuse - Facility Cleaning Program and Supplemental Remedial Investigation
 Phase 1 IRM and Initial Phase 2 IRM - Material Characterization/Disposal

TSCA Rolloff status
 Profile GB-92-0408

Roll-off ID	Size	Accumulation start date	90-day limit	Pick-up date
UPCU 411114	40 cy	8/9/99	11/7/99	10/21/99
UPCU 411907	40 cy	8/9/99	11/7/99	10/21/99
UPCU 411924	40 cy	8/25/99	11/23/99	11/18/99
UPCU 411779	40 cy	8/25/99	11/23/99	11/23/99
UPCU 410620	23 cy	11/24/99	2/21/00	12/8/99
UPCU 410415	23 cy	11/24/99	2/21/00	12/6/99
UPCU 410775	23 cy	1/19/00		
UPCU 410370	23 cy	1/12/00		

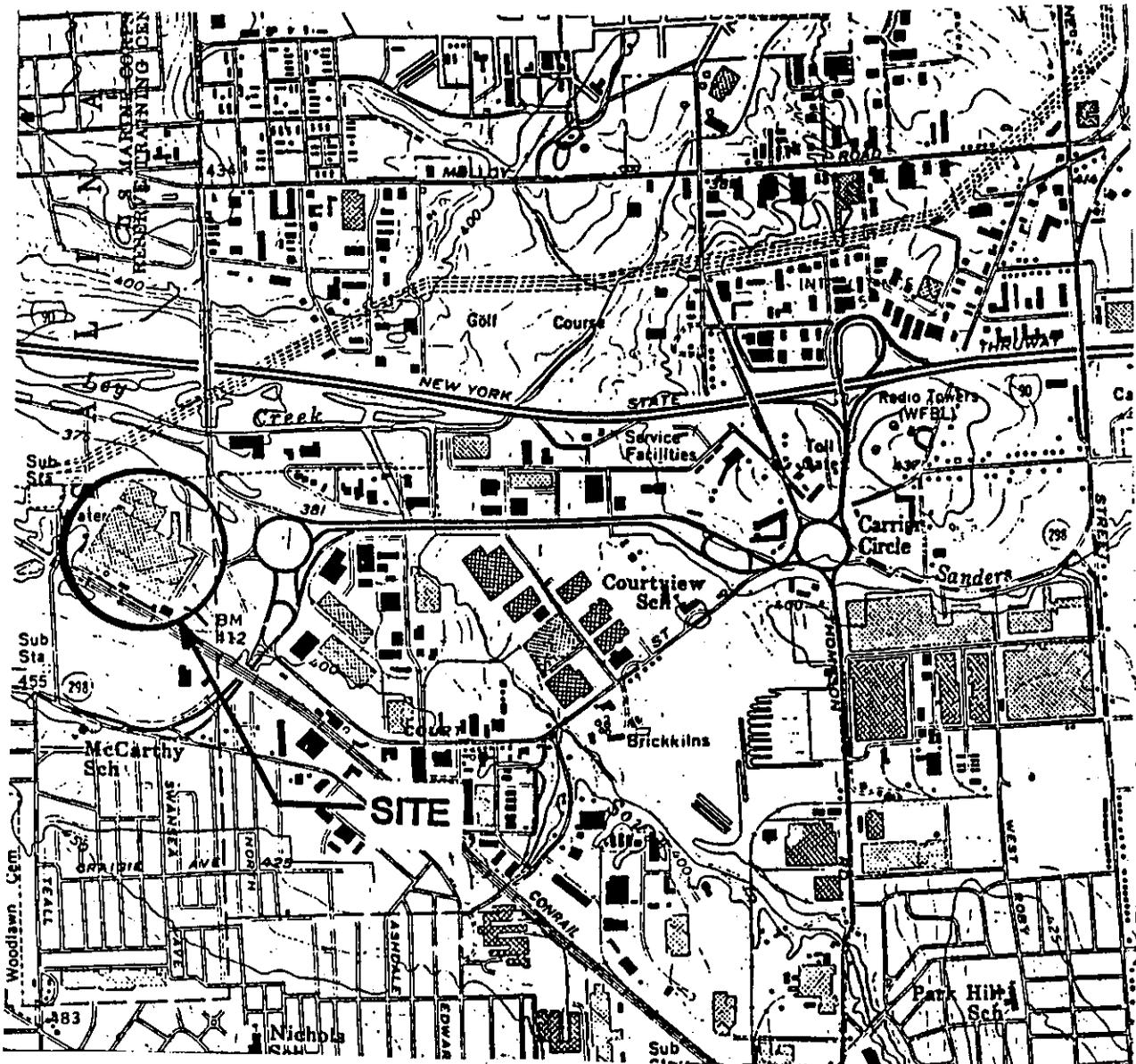
**Table 3-2
Former IFG Facility
Facility Cleaning IRM
Disposal Characterization Data**

Material	Sample Date	Total PCBs (mg/Kg)*	Total VOCs* (ug/L or ug/Kg)		TCLP			Ignitability (mm/s)	Total Releasable H2S (mg/Kg)	Total Releasable HCN (mg/Kg)	pH (STD units)	Flashpoint (Celsius)	% Total Solids
					VOCs* (mg/L)	SVOCs* (mg/L)	Metals* (mg/L)						
Dust/Paint Chip	7/30/99	250	NA		ND	ND	Cd 0.1	NBR	14 mg/Kg	ND	7.5	NA	NA
Wood	7/30/99	1.4	NA		ND	ND	ND	NBR	ND	ND	5.3	NA	NA
Waste Oil	8/9/99	3.8 - Aroclor 1242	NA		ND	ND	ND	NA	ND	ND	7.4	> 60	NA
Clean Oil	8/9/99	4.6 - Aroclor 1242	NA		ND	ND	ND	NA	ND	ND	6.8	> 60	NA
Sump M Oil	8/9/99	170	NA		ND	ND	Ba 64 mg/Kg	NA	ND	ND	6.6	> 60	NA
Virgin Emulsion	8/9/99	1.3	NA		TCE 25000*	ND	ND	NA	ND	ND	4.3	> 60	NA
					PCE 270000*								
Spent Emulsion	8/9/99	2.8	NA		PCE 71000*	ND	ND	NA	ND	ND	5.1	> 60	NA
Waste Solvent	8/19/99	NA	Toluene 240000	2-Butanone 3700	ND	ND	Pb 1	NA	ND	ND	5.4	24	NA
			Ethylbenzene 8400				Se 0.2						
			Xylene (total) 42000										
			1,2,4-Trimethylbenzene 2000										
Mold Storage Sumps	10/14/99	NA	Toluene 1800000	ND	(3+4)-Methylphenol 0.18	Ba 0.8	NBR	ND	ND	ND	9.9	NA	45.2
			Ethylbenzene 230000										
			Xylene (total) 1100000										
			Isopropylbenzene 11000										
			n-Propylbenzene 29000										
			1,3,5-Trimethylbenzene 43000										
			n-Butylbenzene 12000										
			1,2,4-Trimethylbenzene 150000										
			Napthalene 58000										
Decon Sludge	10/25/99	20	Toluene 7100000	2-Butanone 0.63	2-Methylphenol 100	Pb 0.5	NBR	ND	ND	ND	11.6	NA	52
			Ethylbenzene 1100000		(3+4)-Methylphenol 230								
			Xylene (total) 5000000										
			n-Propylbenzene 180000										
			1,3,5-Trimethylbenzene 390000										
			n-Butylbenzene 210000										
			1,2,4-Trimethylbenzene 1300000										
			Napthalene 610000										
Trench Fly Ash	10/25/99	1.7 - Aroclor 1254	NA		ND	ND	ND	NBR	ND	ND	7.5	NA	70.2

Notes:

- * Aroclor 1248 concentration unless otherwise noted. Other Aroclors less than detectable.
- * VOCs which are not listed were less than detectable.
- * SVOCs which are not listed were less than detectable.
- * Metals which are not listed were less than detectable.
- * Units are in ug/Kg
- ND - less than detectable
- NBR - Negative burn rate
- NA - Not analyzed
- TCE - Trichloroethene
- PCE - Tetrachloroethene

M:\P1\DIV71\PROJECTS\4966\21535\DWG\71\IRM\058-F1-1.DWG SF:1



GENERAL MOTORS CORPORATION
FORMER FISHER GUIDE FACILITY SYRACUSE, NY

SITE LOCATION MAP

STATE LOCATION MAP

FILE NO. 4966.21535.058
DATE: DECEMBER 1999



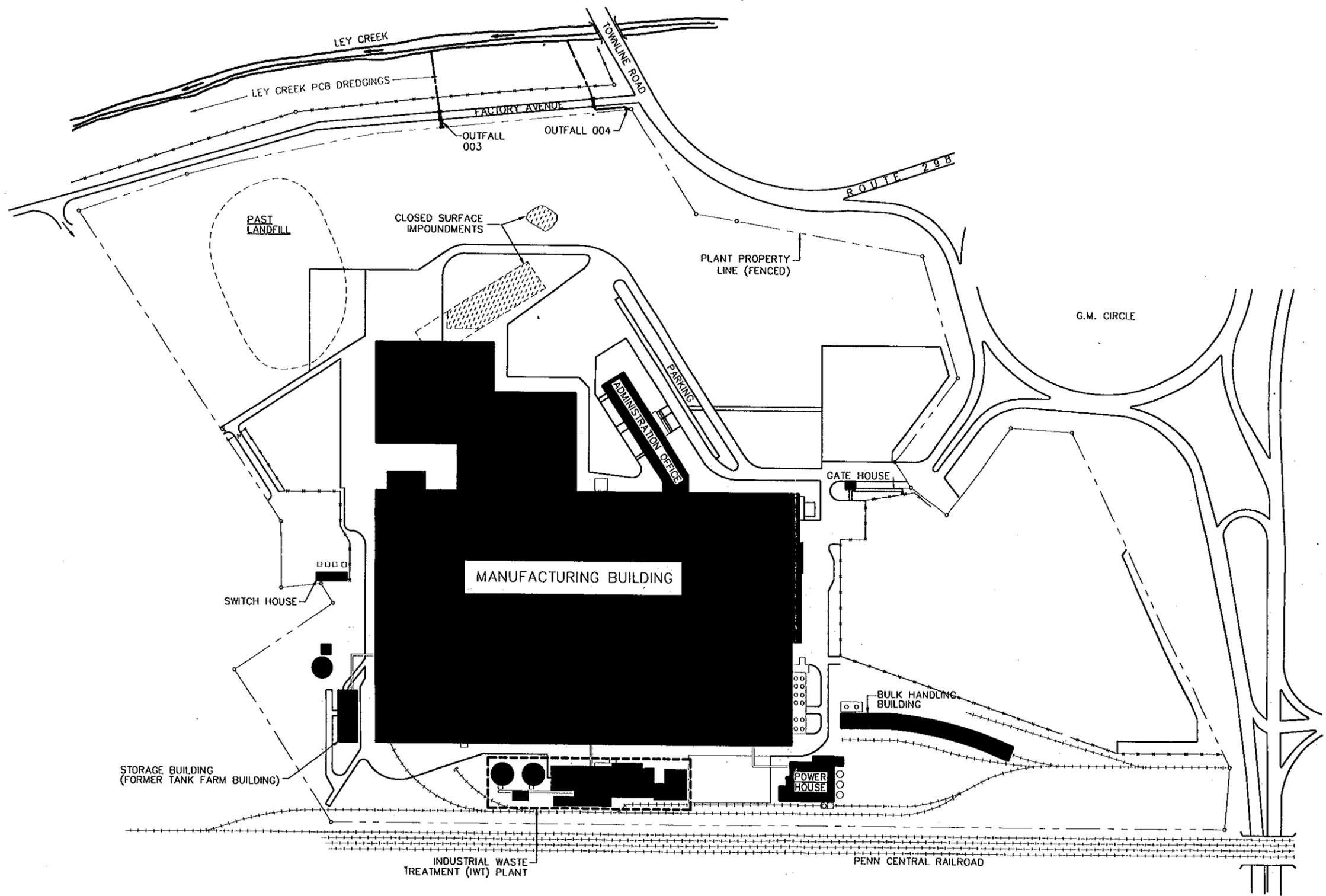
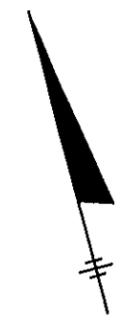
SCALE IN FEET



PLOT DATE:

MWH I: \DIV71\PROJECTS\4966\21535\DWG\71\IRM\059-F1-2.DWG SF:1

FIGURE 1-2



GENERAL MOTORS CORP.
 FORMER INLAND FISHER
 GUIDE FACILITY SYRACUSE, NY
 PHASE 1 AND INITIAL PHASE 2
 FACILITY CLEANING INTERIM
 REMEDIAL MEASURES

SITE PLAN

NOT TO SCALE

DATE: DECEMBER 1999
 FILE NO. 4966.21535.059



REV DATE: 12/29/99

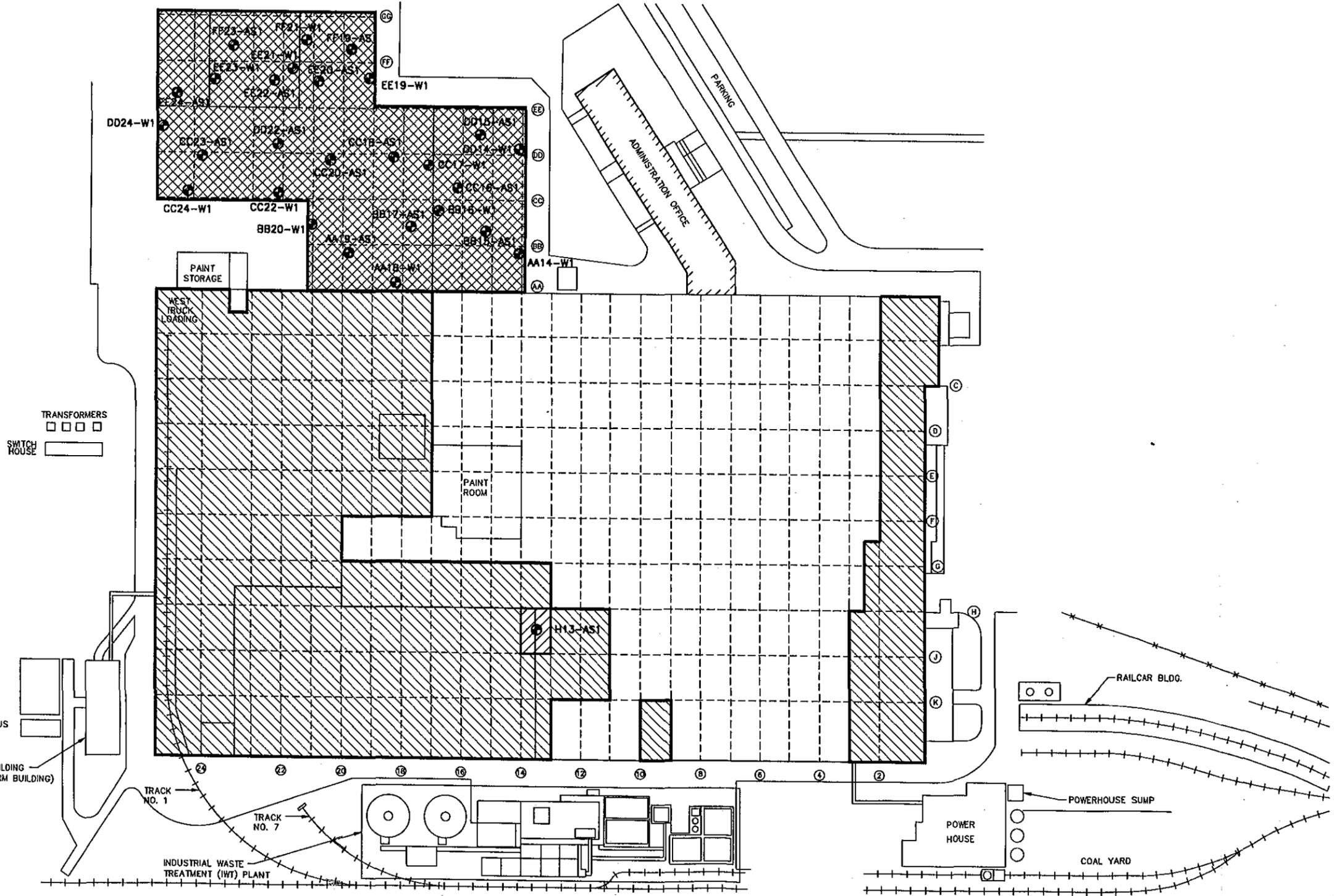


FIGURE 1-3



LEGEND

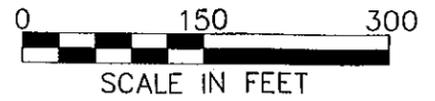
- H13-AS1 SAMPLE LOCATION (OVERHEAD STEEL)
- CLEANED TO <math><10\mu\text{g}/100\text{cm}^2</math> (PHASE 1 IRM)
- CLEANED TO <math><10\mu\text{g}/100\text{cm}^2</math> (INITIAL PHASE 2 IRM)
- CLEANED TO <math><10\mu\text{g}/100\text{cm}^2</math> (IN 1997)

DRAWING NOTE:

1. SAMPLE LOCATIONS AS SHOWN ARE APPROXIMATE.

**GENERAL MOTORS CORP.
FORMER INLAND FISHER
GUIDE FACILITY SYRACUSE, NY
PHASE 1 AND INITIAL PHASE 2
FACILITY CLEANING INTERIM
REMEDIAL MEASURES**

**ABOVE GROUND
SURFACE CLEANING**



DATE: FEBRUARY 2000
FILE NO. 4966.21535.060



REV DATE: 1/14/2000

FIGURE 2-1



LEGEND

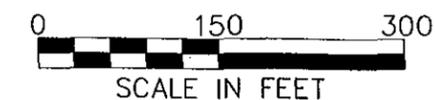
- AA15-F1 SAMPLE LOCATION (OVERHEAD STEEL)
- CLEANED TO <math><10\mu\text{g}/100\text{cm}^2</math> (PHASE 1 IRM)
- CLEANED TO <math><10\mu\text{g}/100\text{cm}^2</math> (INITIAL PHASE 2 IRM)
- DECONTAMINATED FOR REUSE IN ACCORDANCE WITH 40 CFR 761.30(p).

DRAWING NOTE:

1. SAMPLE LOCATIONS AS SHOWN ARE APPROXIMATE.

**GENERAL MOTORS CORP.
FORMER INLAND FISHER
GUIDE FACILITY SYRACUSE, NY
PHASE 1 AND INITIAL PHASE 2
FACILITY CLEANING INTERIM
REMEDIAL MEASURES**

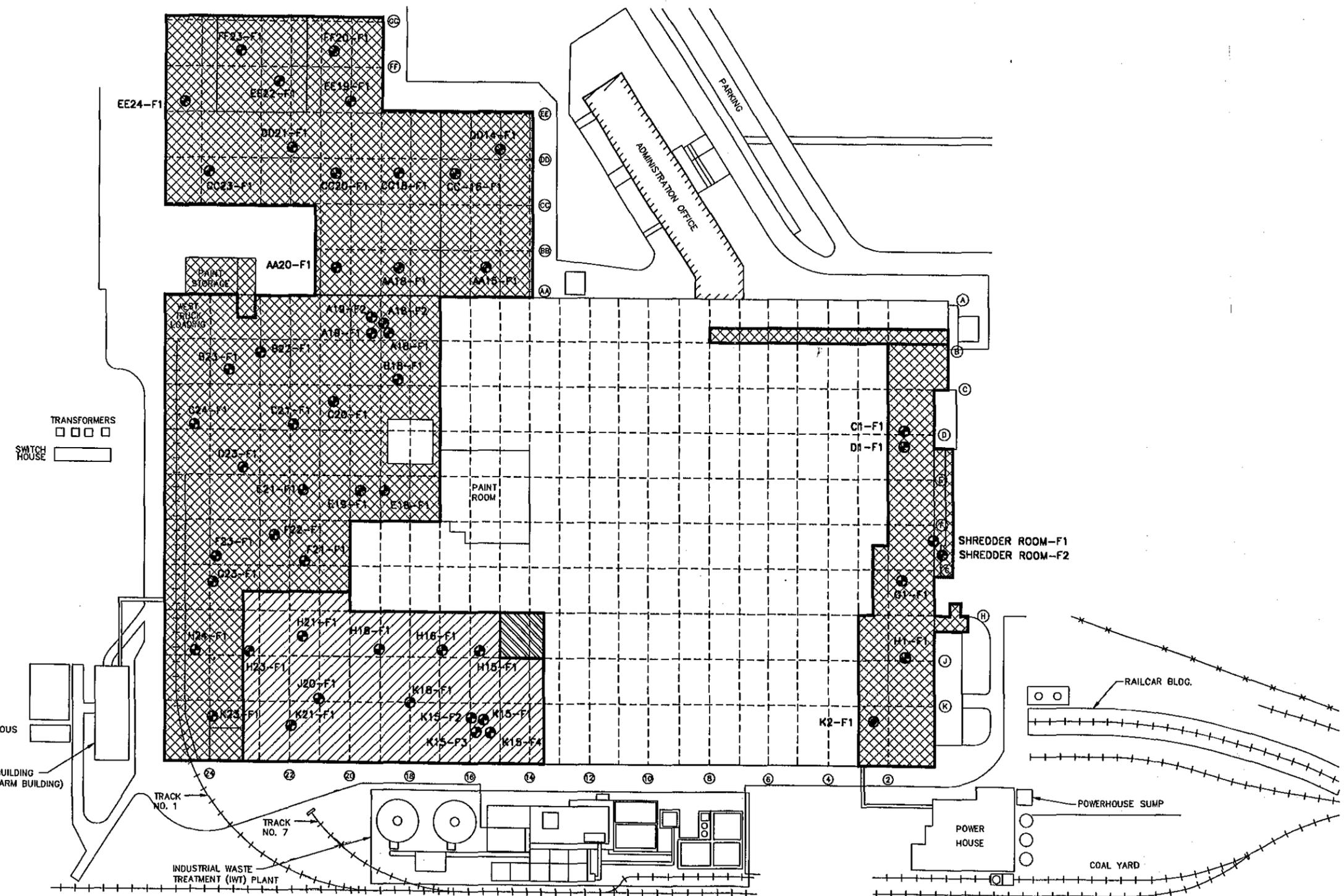
FLOOR CLEANING



DATE: FEBRUARY 2000
FILE NO. 4966.21535.061



REV DATE: 2/14/2000



MMH I: \DIV77\PROJECTS\4966\21535\DWG\7\IRM\062-F2-2.DWG SF:1 (150)

PLOT DATE:

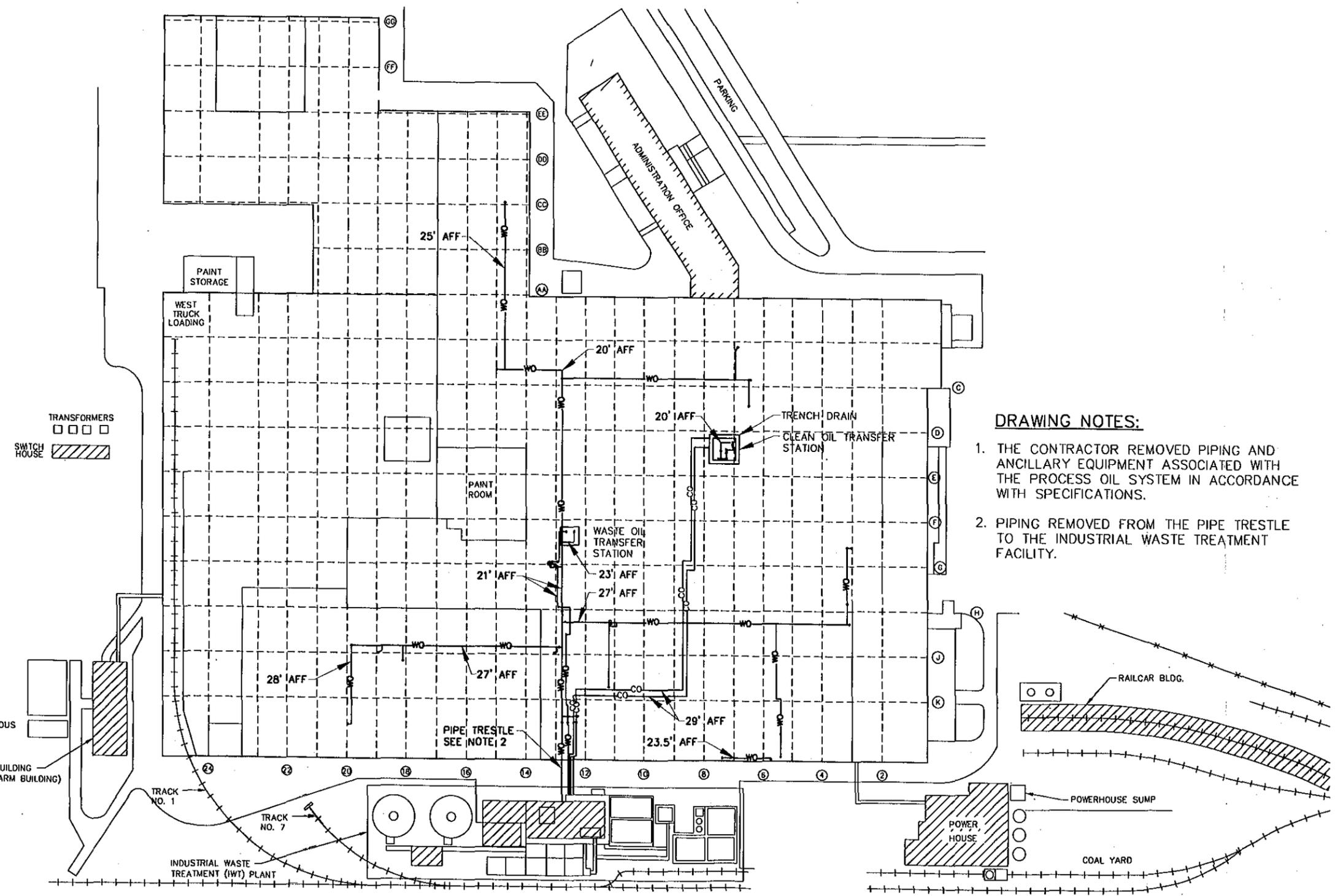


FIGURE 2-2



LEGEND

- wo— WASTE OIL PIPING REMOVED (APPROX. 3175 LINEAR FEET) PIPE SIZES VARY FROM 2"Ø TO 3"Ø
- co— CLEAN/RECLAIM OIL REMOVED (APPROX. 1410 LINEAR FEET) PIPE SIZES VARY FROM 2"Ø TO 3"Ø
- AFF ABOVE FINISHED FLOOR

DRAWING NOTES:

1. THE CONTRACTOR REMOVED PIPING AND ANCILLARY EQUIPMENT ASSOCIATED WITH THE PROCESS OIL SYSTEM IN ACCORDANCE WITH SPECIFICATIONS.
2. PIPING REMOVED FROM THE PIPE TRESTLE TO THE INDUSTRIAL WASTE TREATMENT FACILITY.

**GENERAL MOTORS CORP.
FORMER INLAND FISHER
GUIDE FACILITY SYRACUSE, NY**

**PHASE 1 AND INITIAL PHASE 2
FACILITY CLEANING INTERIM
REMEDIAL MEASURES**

**PROCESS OIL PIPING
PLAN**

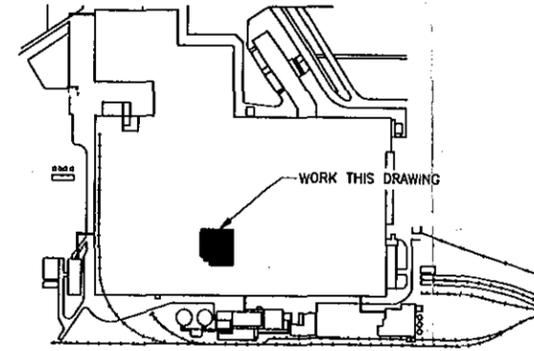
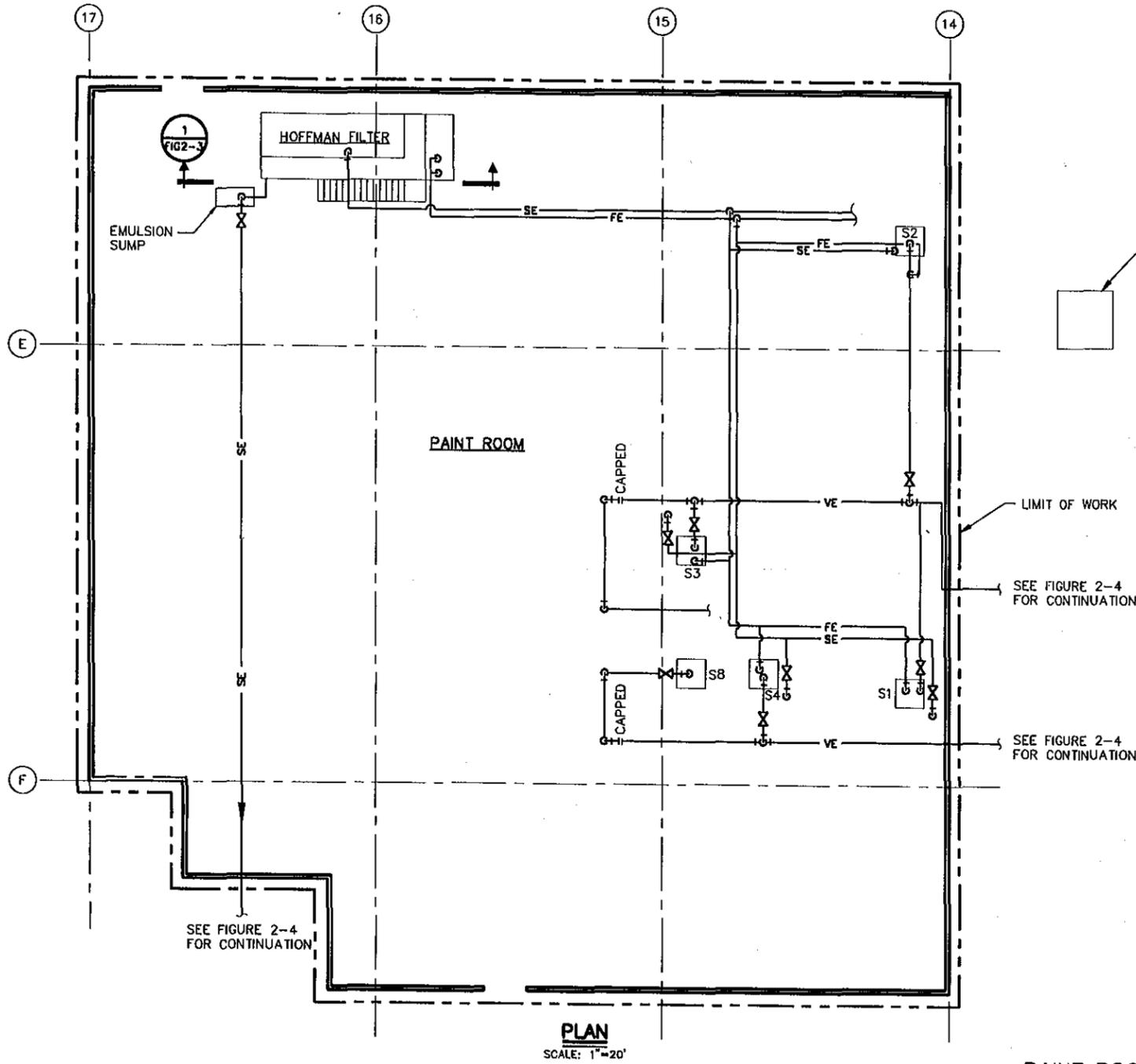


DATE: JANUARY 2000
FILE NO. 4966.21535.062



REV DATE: 1/3/00

FIGURE 2-3



KEY PLAN
NOT TO SCALE

LEGEND

- VE — VIRGIN EMULSION PIPING REMOVED
PIPE SIZES VARY FROM 2"Ø TO 6"Ø
- SE — SPENT EMULSION PIPING REMOVED
PIPE SIZES VARY FROM 2"Ø TO 3"Ø
- FE — FILTERED EMULSION PIPING REMOVED
PIPE SIZES VARY FROM 2"Ø TO 6"Ø
- - - - - LIMIT OF WORK

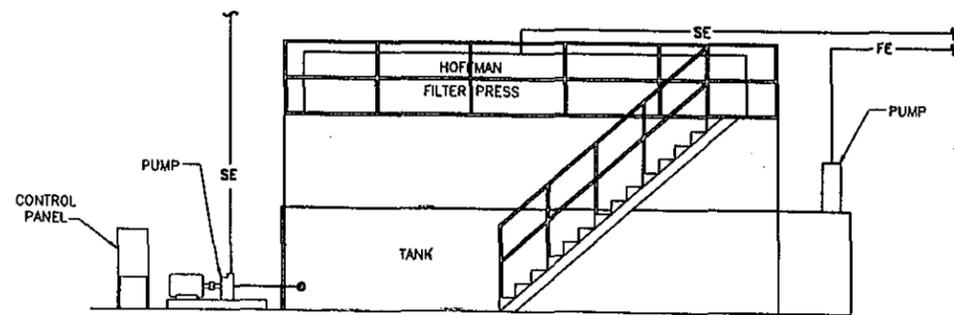
GENERAL MOTORS CORP.
FORMER INLAND FISHER
GUIDE FACILITY SYRACUSE, NY
PHASE 1 AND INITIAL PHASE 2
FACILITY CLEANING INTERIM
REMEDIAL MEASURES

PAINT ROOM
EMULSION SYSTEM



PAINT ROOM NOTES:

1. CONTRACTOR REMOVED PIPING AND ANCILLARY EQUIPMENT ASSOCIATED WITH THE EMULSION SYSTEM IN ACCORDANCE WITH SPECIFICATIONS.
2. CONTRACTOR DISMANTLED AND REMOVED THE HOFFMAN FILTER, ALL PUMPS, ANCILLARY EQUIPMENT, ELECTRICAL CONTROL PANEL AND PIPING.



SECTION
NOT TO SCALE



M:\1\PROJECTS\4966\21535\DWG\71\IRM\064-F2-4.DWG SF:1 (150)

PLOT DATE:

FIGURE 2-4



LEGEND

- VE — VIRGIN EMULSION PIPING REMOVED
(APPROX. 460 LINEAR FEET)
PIPE SIZES VARY FROM 2"Ø TO 3"Ø
- SE — SPENT EMULSION PIPING REMOVED
(APPROX. 600 LINEAR FEET)
PIPE SIZES VARY FROM 2"Ø TO 3"Ø
- WS — WASTE SOLVENT PIPING REMOVED
(APPROX. 1400 LINEAR FEET)
PIPE SIZES VARY FROM 2"Ø TO 3"Ø
- G — GLYCOL PIPING
- AFF ABOVE FINISHED FLOOR

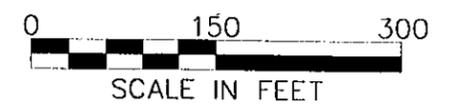
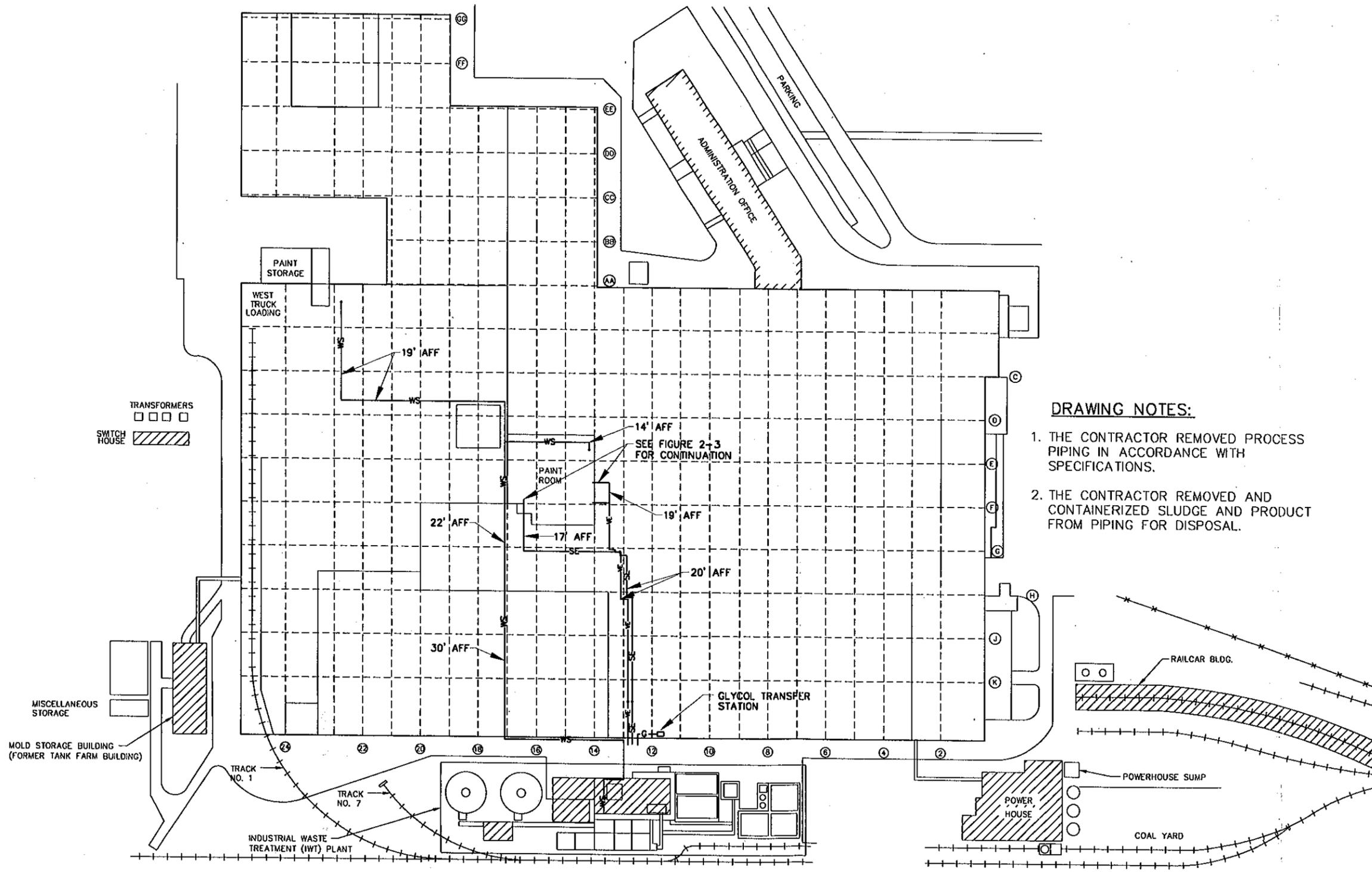
DRAWING NOTES:

1. THE CONTRACTOR REMOVED PROCESS PIPING IN ACCORDANCE WITH SPECIFICATIONS.
2. THE CONTRACTOR REMOVED AND CONTAINERIZED SLUDGE AND PRODUCT FROM PIPING FOR DISPOSAL.

**GENERAL MOTORS CORP.
FORMER INLAND FISHER
GUIDE FACILITY SYRACUSE, NY**

**PHASE 1 AND INITIAL PHASE 2
FACILITY CLEANING INTERIM
REMEDIAL MEASURES**

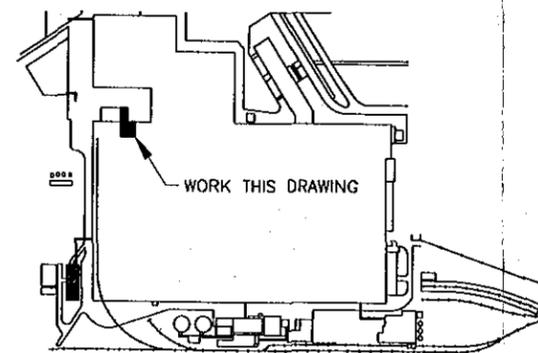
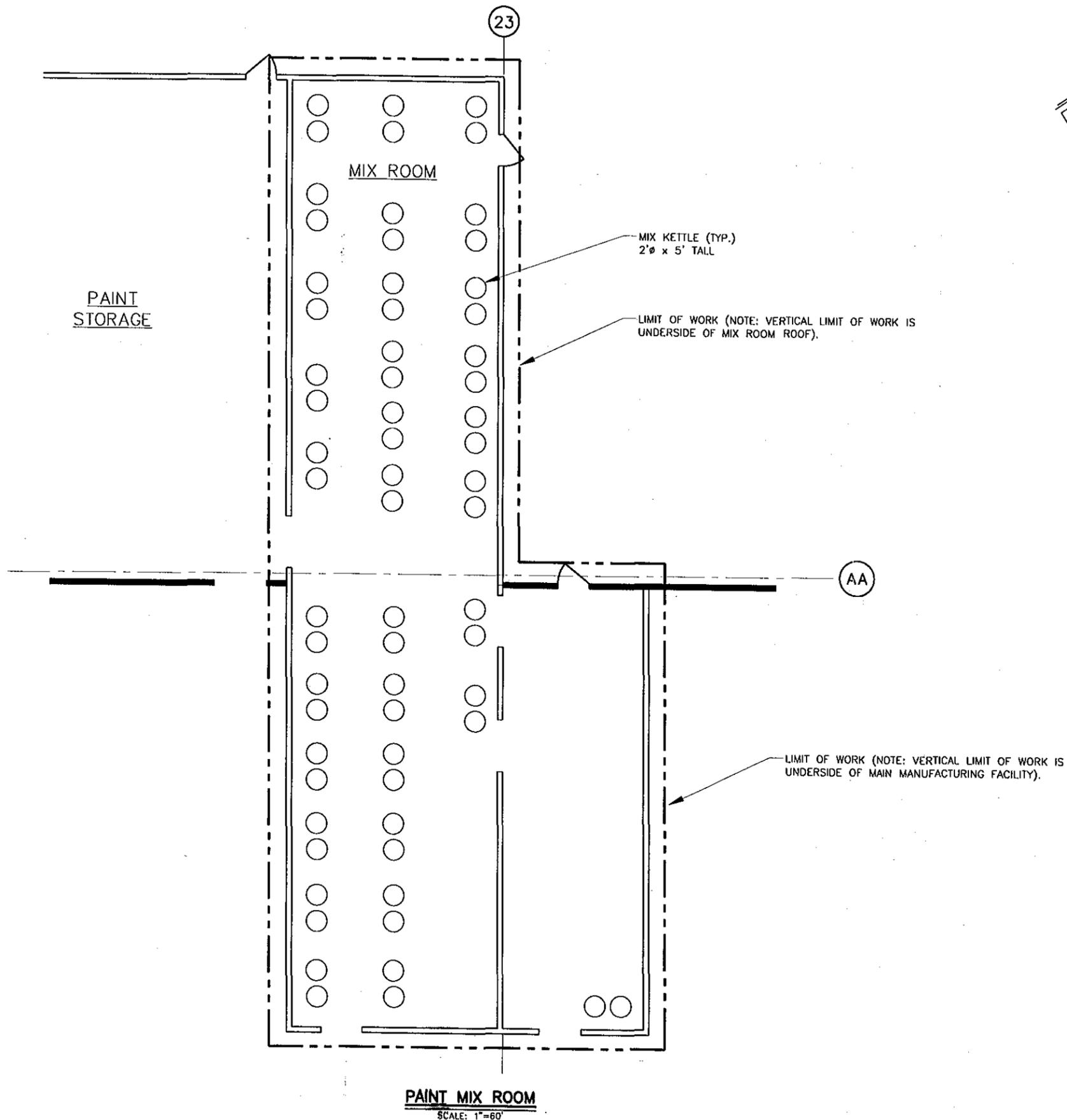
PROCESS PIPING PLAN



DATE: JANUARY 2000
FILE NO. 4966.21535.064



REV DATE: 12/30/99



KEY PLAN
NOT TO SCALE

FIGURE 2-5

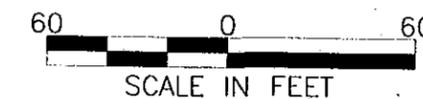


LEGEND

--- LIMIT OF WORK

GENERAL MOTORS CORP.
FORMER INLAND FISHER
GUIDE FACILITY SYRACUSE, NY
PHASE 1 AND INITIAL PHASE 2
FACILITY CLEANING INTERIM
REMEDIAL MEASURES

**PAINT EQUIPMENT
& PIPING**



PAINT MIX ROOM NOTES:

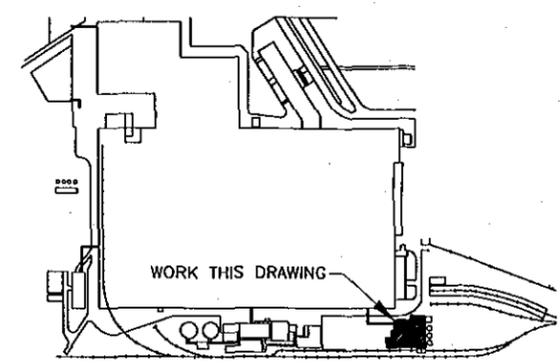
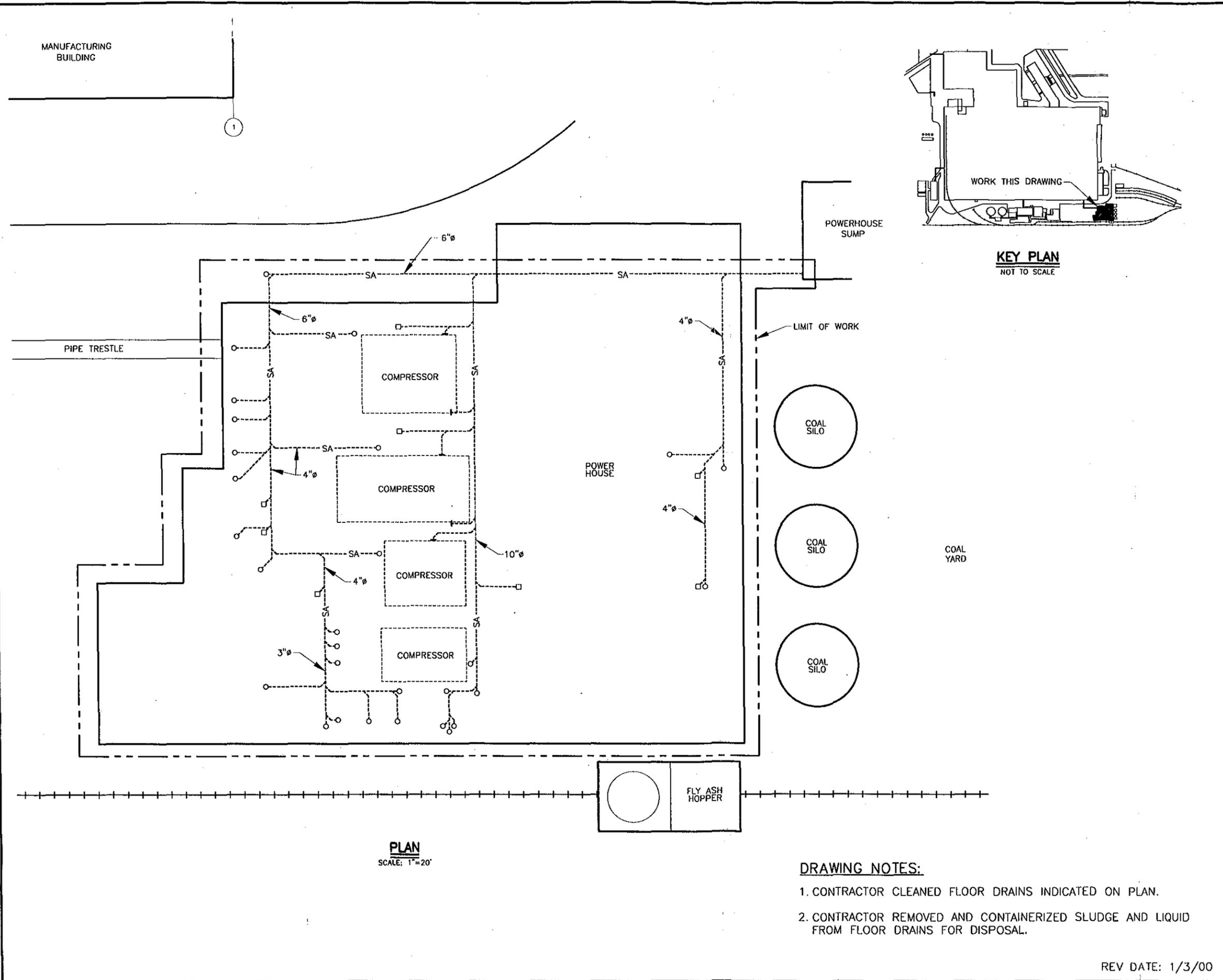
1. MIXING VESSELS, ASSOCIATED PIPING (INCLUDING VENT PIPING) AND EQUIPMENT WERE REMOVED IN THEIR ENTIRETY IN ACCORDANCE WITH THE SPECIFICATIONS.

DATE: JANUARY 2000

FILE NO. 4966.21535.065



REV DATE: 1/3/00



KEY PLAN
NOT TO SCALE

- LEGEND**
- SA----- OPERATING FLOOR SANITARY SEWER (APPROX. 3860 L.F.)
 - ○ FLOOR DRAINS/CLEAN OUTS
 - LIMIT OF WORK

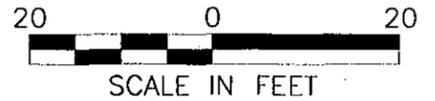
**GENERAL MOTORS CORP.
FORMER INLAND FISHER
GUIDE FACILITY SYRACUSE, NY
PHASE 1 AND INITIAL PHASE 2
FACILITY CLEANING INTERIM
REMEDIAL MEASURES**

**POWER HOUSE
FLOOR DRAINS**

PLAN
SCALE: 1"=20'

DRAWING NOTES:

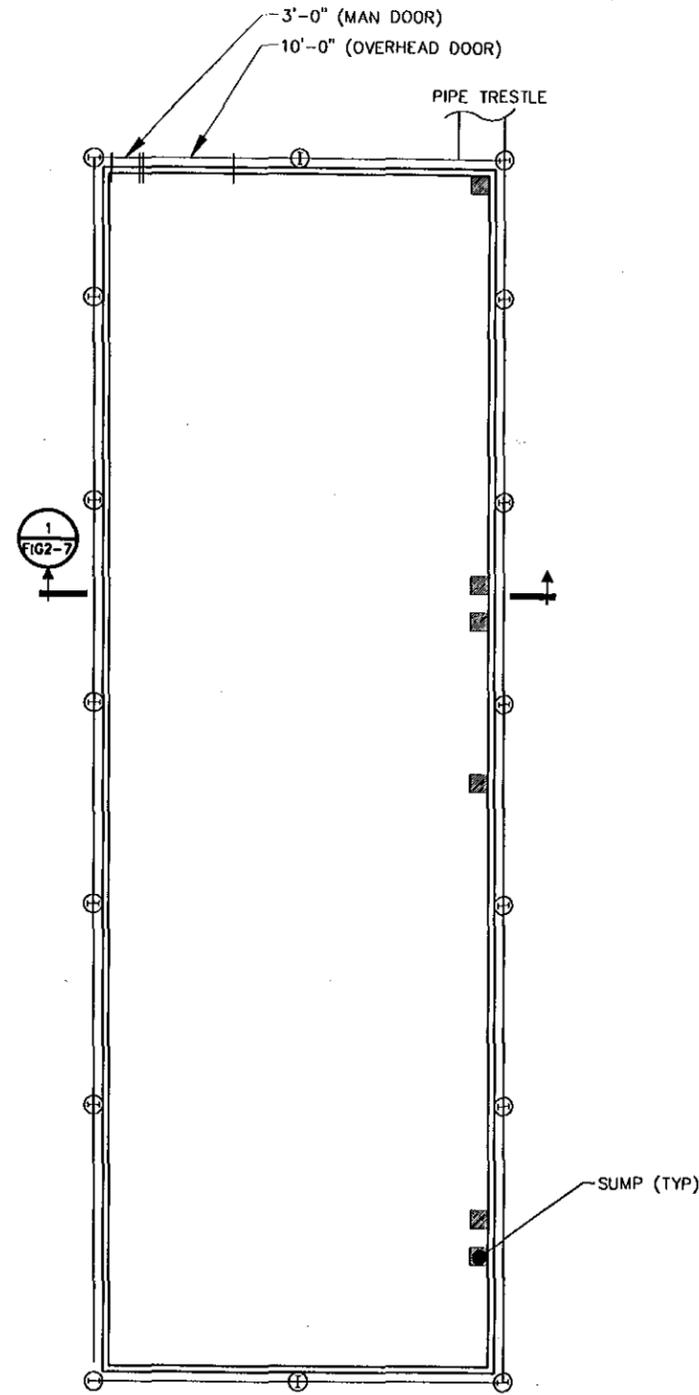
1. CONTRACTOR CLEANED FLOOR DRAINS INDICATED ON PLAN.
2. CONTRACTOR REMOVED AND CONTAINERIZED SLUDGE AND LIQUID FROM FLOOR DRAINS FOR DISPOSAL.



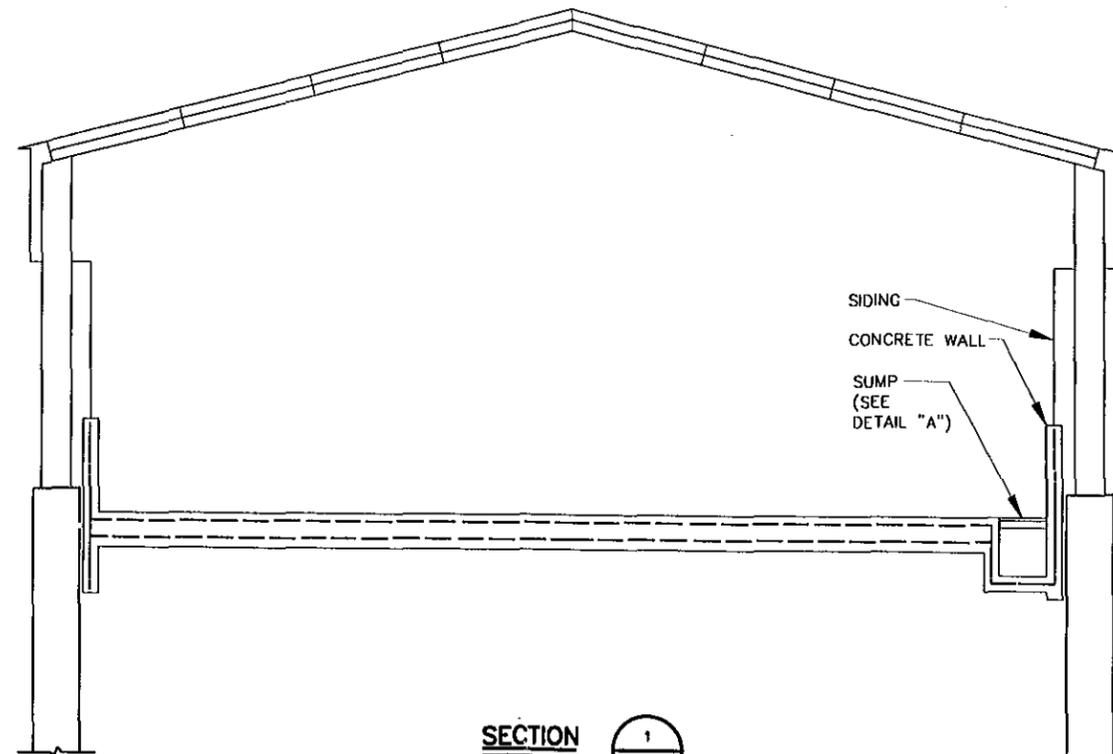
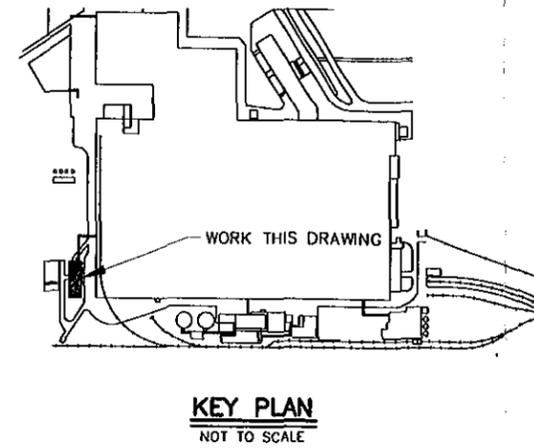
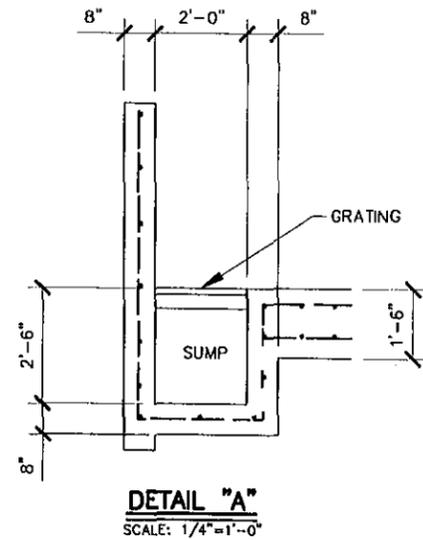
DATE: JANUARY 2000
FILE NO. 4966.21535.066



REV DATE: 1/3/00



PARTIAL PLAN - MOLD STORAGE BUILDING
FORMER TANK FARM
SCALE: 1"=20'



SECTION
SCALE: 1/8"=1'-0" **1**
FIG2-7

DRAWING NOTES:

1. THE CONTRACTOR PERFORMED CLEANING ACTIVITIES IN ACCORDANCE WITH GENERAL MOTORS CLEANUP SPECIFICATIONS.
2. RESIDUALS WERE COLLECTED, CONTAINERIZED AND MANAGED IN ACCORDANCE WITH GENERAL MOTORS CLEANUP SPECIFICATIONS.
3. SUMPS LOCATED IN MOLD STORAGE BUILDING WERE FILLED IN W/ CONCRETE AFTER BEING CLEANED.

FIGURE 2-7



GENERAL MOTORS CORP.
FORMER INLAND FISHER
GUIDE FACILITY SYRACUSE, NY
PHASE 1 AND INITIAL PHASE 2
FACILITY CLEANING INTERIM
REMEDIAL MEASURES

**MOLD STORAGE
BUILDING**

APPROXIMATE
SCALE AS NOTED

DATE: JANUARY 2000
FILE NO. 4966.21535.067



REV DATE: 1/3/00

APPENDIX A

Manifest copies

NYG1765566

HAZARDOUS WASTE MANIFEST
P.O. Box 12820, Albany, New York 12212

28242 (Hazardous Waste Manifest 1/5/99)

Please type or print. Do not staple

GENERATOR
TRANSPORTER
FACILITY
In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. N Y D 0 0 2 2 3 9 4 4 0	Manifest Doc. No. 00191	2. Page 1 of 2	Information within heavy bold line is not required by Federal Law.
---	---	----------------------------	-------------------	--

3. Generator's Name and Mailing Address INLAND FISHER GUIDE, GM 1 GENERAL MOTORS DRIVE SYRACUSE, NY 13206		A. NYG1765566
4. Generator's Telephone Number (315) 432-5000		B. Generator's ID SAME
5. Transporter 1 (Company Name) BUFFALO FUEL CORP	6. US EPA ID Number N Y R 0 0 0 0 4 5 7 2 4	C. State Transporter's ID 72763N NY
7. Transporter 2 (Company Name) NORFOLK - SOUTHERN	8. US EPA ID Number V A D 0 0 0 6 5 0 3 0 9	D. Transporter's Telephone (800) 677-8003
9. Designated Facility Name and Site Address SAFETY-KLEEN, INC (GRAYBACK MT) 3 MILES E, 7 MILES N OF EXIT 41 OFF I-80 CLIVE, UTAH 84029		E. State Transporter's ID
10. US EPA ID Number U T D 9 9 1 3 0 1 7 4 8		F. Transporter's Telephone (800) 635-5768
		G. State Facility ID
		H. Facility Telephone (801) 323-8900

11. US DOT Description (including Proper Shipping Name, Hazard Class and ID Number)	12. Containers		13. Total	14. Unit	1. Waste No.
	Number	Type	Quantity	Wt/Vol	
a. ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S. (POLYCHLORINATED BIPHENYLS) HAZARDOUS CLASS 9 UN3077, PACKING GROUP III RO	0 0 1	C M	0 0 0 4 0	Y	EPA STATE B007
b.					EPA STATE
c.					EPA STATE
d.					EPA STATE

J. Additional Descriptions for Materials listed Above	K. Handling Codes for Wastes Listed Above
a. GB920408 PCB DEBRIS AND/OR RAGS	a. <input checked="" type="checkbox"/> L <input type="checkbox"/> c <input type="checkbox"/>
b.	b. <input type="checkbox"/> d <input type="checkbox"/>

15. Special Handling Instructions and Additional Information
 ACCUMULATION START DATE: 8/9/99
 ROLL-OFF ID: UPCU 41114
 EMERGENCY RESPONSE 1-800-424-8802
 LOCAL RESPONSE 315-432-5000

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

Printed/Typed Name: JAMES HARTNETT
 Signature: *James F. Hartnett*
 Mo. Day Year: 10/28/99

17. Transporter 1 Acknowledgement of Receipt of Materials
 Printed/Typed Name: Joseph E Meyers
 Signature: *Joseph E Meyers*
 Mo. Day Year: 10/21/99

18. Transporter 2 Acknowledgement of Receipt of Materials
 Printed/Typed Name: C.S. Whittington NS Ry
 Signature: *C.S. Whittington NS Ry*
 Mo. Day Year: 10/21/99

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
 Printed/Typed Name: SCOTT ANDERSON
 Signature: *Scott Anderson*
 Mo. Day Year: 11/15/99

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator's US EPA ID No.
 NYD002239440

Manifest Document No.
 00101
~~65566~~

22. Page
 2

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

23. Generator's Name
 INLAND FISHER BUIDE, GM
 1 GENERAL MOTORS DRIVE
 SYRACUSE, NY 13206

L. State Manifest Document Number
 NYGI765566
 M. State Generator's ID
 SAME

24. Transporter 3 Company Name
 UPRR

25. US EPA ID Number
 NED001792910

N. State Transporter's ID
 O. Transporter's Phone 402-271-4400

26. Transporter 4 Company Name
 McFarland & Hullinger

27. US EPA ID Number
 UTD9809547916

P. State Transporter's ID
 Q. Transporter's Phone 801-252-2019

28. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)

29. Containers No. Type
 30. Total Quantity
 31. Unit Wt/Vol
 R. Waste No.

	RM	No.	Type	Total Quantity	Unit Wt/Vol	Waste No.
a.						
b.						
c.						
d.						
e.						
f.						
g.						
h.						
i.						

S. Additional Descriptions for Materials Listed Above
 Box # 41114

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

33. Transporter 3 Acknowledgement of Receipt of Materials
 Printed/Typed Name UPRR

Signature UPRR

Date
 Month Day Year

34. Transporter 4 Acknowledgement of Receipt of Materials
 Printed/Typed Name NEAL K Dymock

Signature *Neal K Dymock*

Date
 11/15/99

35. Discrepancy Indication Space

GENERATOR

TRANSPORTER FACILITY

CERTIFICATE OF DISPOSAL

Safety-Kleen (Lone & Grassy Mountain), Inc.
Grassy Mountain Facility
3 mi. East, 7 mi. North of Exit 41*
Clive UT
EPA ID # - UTD991301748

As required by 40 CFR 761.218 (a), we are providing this Certificate of Disposal to INLAND FISHER GUIDE DIVISION O
to confirm that load # 1999008903

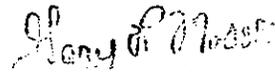
LINE	PROFILE No.	WASTE NAME	WEIGHT Kg	TYPE	DISPOSAL CELL	DISPOSED
1/A	GB92-0408	130576 PCB DEBRIS, AND/OR RAGS	6349.21	BULK	CB /R11 /1	11/16/99

shipped on manifest number NYD002239440-00101 was/were disposed in an EPA approved chemical waste landfill.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the person who, acting under my direct instructions, made the verification that this information is true, accurate and complete.

Cert. # 008858

Safety-Kleen (Lone and
Grassy Mountain), Inc., Grassy Mountain Facility
EPA ID# UTD991301748



Gary Mossor, General Manager



- Deact.
- Neut
- Micro

LOAD SUMMARY RECORD

GM 046277

DESTINATION:

- STAB
- RCRA
- TSCA B

Arrived <input checked="" type="checkbox"/>	Reconciled <input checked="" type="checkbox"/>	Departed <input checked="" type="checkbox"/>	Dropped <input checked="" type="checkbox"/>	Reviewed	Billing 11/17	Manifest Mailed 11/17
Date 11/15		Order No. 2824Z		Load No. 1999008903		
Generator INLAND FISHER				Hauler MCNHC		
Truck No. 210		Container No. (s)/ Railcar No. 41114				
Container Type: ED <input checked="" type="radio"/> TT FB V Other				Load Count (Rail Only): 1 2 3 4		
Operator Signature				Count		Date

12:26 PM 11 16 99

48600 LB

34600 LB TR

14000 LB NET

Load Washout Information		(Washout Stamp)
Washout: <input checked="" type="radio"/> Yes <input type="radio"/> No		Type: Interior <input type="radio"/> Exterior <input checked="" type="radio"/>
Washout Signature	Date 11-16-99	
Driver Signature	Date 11-16-99	

Item	Comments	Name	Date

Tracking Information	Time	Initials	Comments
Arrival Complete:			
TSD Complete:			
Disposal Complete:			
Washout Complete:			
Departure Complete:			

Safety-Kleen, Grassy Mountain Facility, Tooele County, Utah

(WHITE - Facility

CANARY - Generator

PINK - Transporter

GREEN - Receiving

GOLD - Operations)

NYG1765575

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST
P.O. Box 12820, Albany, New York 12212

28241



28241/AS
28241/AS
(Hazardous Waste Manifest 1/5/99)

Please type or print. Do not staple

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. N Y D 0 0 2 2 3 9 4 4 0	Manifest Doc. No. 00102 65575	2. Page 1 of 2	Information within heavy bold line is not required by Federal Law.
3. Generator's Name and Mailing Address INLAND FISHER GUIDE, GM 1 GENERAL MOTORS DRIVE SYRACUSE, NY 13206			A. NYG 1765575		
4. Generator's Telephone Number (315) 432-5000			B. Generator's ID SAME		
5. Transporter 1 (Company Name) BUFFALO FUEL CORP		6. US EPA ID Number N Y R 0 0 0 0 4 5 7 2 4		C. State Transporter's ID 72763N NY	
7. Transporter 2 (Company Name) NORFOLK - SOUTHERN		8. US EPA ID Number V A D 0 0 0 6 5 0 3 0 9		D. Transporter's Telephone (800) 677-8003	
9. Designated Facility Name and Site Address SAFETY-KLEEN, INC. (GRAYBACK MT) 3 MILES E, 7 MILES N OF EXIT 41 OFF I-80 CLIVE, UTAH 84029		10. US EPA ID Number U T D 9 9 1 3 0 1 7 4 8		E. State Transporter's ID	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number) a. ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S. (POLYCHLORINATED BIPHENYLS) HAZARDOUS CLASS 9, UN3077, PACKING GROUP III RQ		12. Containers Number Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
		0 0 1 C M	0 0 0 4 0	Y	EPA STATE B007
b.					EPA STATE
c.					EPA STATE
d.					EPA STATE
J. Additional Descriptions for Materials listed Above			K. Handling Codes for Wastes Listed Above		
a. GB920408 PCB DEBRIS/ AND/OR RAGS		c	.	a	<input checked="" type="checkbox"/> T <input type="checkbox"/> c
b.		d	.	b	<input type="checkbox"/> d <input type="checkbox"/>
15. Special Handling Instructions and Additional Information ACCUMULATION START DATE: 8/9/99 EMERGENCY RESPONSE 1-800-424-8802 ROLL-OFF ID: UPCU 411901 LOCAL RESPONSE XXXXX 315-432-5000					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name JAMES HARTNETT		Signature <i>James F. Hartnett</i>		Mo. Day Year 11 02 1999	
17. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name Joseph E Meyers		Signature <i>Joseph E Meyers</i>		Mo. Day Year 11 02 1999	
18. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name Melanie Swisher		Signature <i>Melanie Swisher</i>		Mo. Day Year 11 02 1999	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19					
Printed/Typed Name SANDERSON		Signature <i>S Anderson</i>		Mo. Day Year 11 15 99	

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator's US EPA ID No.
 NYD0002239440

Manifest Document No.
 00102
 615575

22. Page
 2

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

23. Generator's Name
 INLAND FISHER GUIDE, GM
 1 GENERAL MOTORS DRIVE
 SYRACUSE, NY 13206

L. State Manifest Document Number
 NYG1765575

M. State Generator's ID
 SAME

24. Transporter 3 Company Name
 UPRR

25. US EPA ID Number
 NED001792910

N. State Transporter's ID

O. Transporter's Phone 402-271-4400

26. Transporter 4 Company Name
 McFarland & Hullinger

27. US EPA ID Number
 UTD980954796

P. State Transporter's ID

Q. Transporter's Phone 801-252-2019

28. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)

	HM	29. Containers		30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
		No.	Type			
a.						
b.						
c.						
d.						
e.						
f.						
g.						
h.						
i.						

S. Additional Descriptions for Materials Listed Above
 Box # 411901

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

33. Transporter 3 Acknowledgement of Receipt of Materials
 Printed/Typed Name UPRR Signature UPRR Date Month Day Year

34. Transporter 4 Acknowledgement of Receipt of Materials
 Printed/Typed Name NEAL K Dymock Signature [Signature] Date 11/15/99

35. Discrepancy Indication Space

GENERATOR

TRANSPORTER

FACILITY



- Deact.
- Neut
- Micro

LOAD SUMMARY RECORD

GM 046278

DESTINATION:

- STAB
- RCRA
- TSCA **B**

Arrived	Reconciled	Departed	Dropped	Reviewed	Billing	Manifest Mailed
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Date	Order No.	Load No.				
11/15	28241	1999008904				
Generator			Hauler			
INLAND FISHER			MCNHC			
Truck No.	Container No. (s)/ Railcar No.					
210	411901					
Container Type:			Load Count (Rail Only):			
ED G TT FB V Other			1 2 3 4			
Operator Signature			Count	Date		

11:45 AM 11 16 99

43900 LB

34600 LB TR

9380 LB NET

Load Washout Information

(Washout Stamp)

Washout:	Type:
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Interior <input type="checkbox"/> Exterior <input checked="" type="checkbox"/>
Washout Signature	Date
<i>[Signature]</i>	11-16-99
Driver Signature	Date
<i>[Signature]</i>	11-16-99

Item	Comments	Name	Date

Tracking Information	Time	Initials	Comments
Arrival Complete:			
TSD Complete:			
Disposal Complete:			
Washout Complete:			
Departure Complete:			

Safety-Kleen, Grassy Mountain Facility, Tooele County, Utah

(WHITE - Facility

CANARY - Generator

PINK - Transporter

GREEN - Receiving

GOLD - Operations)

CERTIFICATE OF DISPOSAL

Safety-Kleen (Lone & Grassy Mountain), Inc.
Grassy Mountain Facility
3 mi. East, 7 mi. North of Exit 41*
Clive UT
EPA ID # - UTD991301748

As required by 40 CFR 761.218 (a), we are providing this Certificate of Disposal to INLAND FISHER GUIDE DIVISION O
to confirm that load # 1999008904

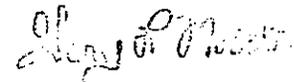
LINE	PROFILE No.	WASTE NAME	WEIGHT Kg	TYPE	DISPOSAL CELL	DISPOSED
1/A	GB92-0408	130576 PCB DEBRIS, AND/OR RAGS	4253.97	BULK	CB /H11 /1	11/16/99

shipped on manifest number NYD002239440-00102 was/were disposed in an EPA approved chemical waste landfill.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the person who, acting under my direct instructions, made the verification that this information is true, accurate and complete.

Cert. # 008859

Safety-Kleen (Lone and
Grassy Mountain), Inc., Grassy Mountain Facility
EPA ID# UTD991301748



Gary Mossor, General Manager

NYG 1765584

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS



HAZARDOUS WASTE MANIFEST
P.O. Box 12820, Albany, New York 12212

Please type or print. Do not staple.

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. NY D002239406554	Manifest Doc. No. 00103	2. Page 1 of 1	Information within heavy bold line is not required by Federal Law.
---	---	-----------------------------------	----------------	--

3. Generator's Name and Mailing Address Former IFG Facility - Syracuse One General Motors Dr. Syracuse, NY 13206		A. Facility ID NYG 1765584		
4. Generator's Telephone Number (315) 432-5000		B. Generator's ID		

5. Transporter 1 (Company Name) TRI-State Motor Transit Co	6. US EPA ID Number M O D 0 9 5 0 3 8 9 9 8	C. State Transporter's ID		
7. Transporter 2 (Company Name)	8. US EPA ID Number	D. Transporter's Telephone (800) 794-8768		
		E. State Transporter's ID		
		F. Transporter's Telephone ()		

9. Designated Facility Name and Site Address Safety Kleen - Wichita 2549 N New York Ave. Wichita KS 67219		G. State Facility ID		
10. US EPA ID Number KS D 0 0 7 2 4 6 8 4 6		H. Facility Telephone (316) 269-7400		

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers Number	13. Total Quantity	14. Unit	15. Waste No.	
				EPA	STATE
a. RA, Waste Mercury, 8, UN2809, III	002	DM00200	P	0009	
b. RA, Flammable liquid, N.O.S., (Toluene, Methyl Ethyl Ketone), 3, UN1993, II	001	DM00045	G	0001	
c. RA, Hazardous Waste Liquids, N.O.S., (Tetrachloroethylene, Trichloroethylene), 9, NA3082, III	005	DM00275	G	0039	
d.					

J. Additional Descriptions for Materials listed Above		K. Handling Codes for Wastes Listed Above	
a. 2182981	c. 2183000; 1010	a. A	b. B
b. 2182982; FeO3; D035	d.	b. B	d.

15. Special Handling Instructions and Additional Information
Emergency Response 1-800-424-8802
Local Response 315-432-5000

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

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

Printed/Typed Name: **MAUREEN MARKERT & LINDSEY HARTNETT** Signature: *Maureen Markert* Mo. **11** Day **10** Year **99**

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: _____ Signature: _____ Mo. _____ Day _____ Year _____

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name: _____ Signature: _____ Mo. _____ Day _____ Year _____

19. Discrepancy Indication Space
1lb. Corrosive Pen to reflect waste labels. Tim Wills

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

Printed/Typed Name: **Tim Wills** Signature: *Tim Wills* Mo. **11** Day **11** Year **99**

NYG1765593

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS



HAZARDOUS WASTE MANIFEST
P.O. Box 12820, Albany, New York 12212

(Hazardous Waste Manifest 1/5/99)

Please type or print. Do not staple

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NYD002239440	Manifest Doc. No. 00104	2. Page 1 of 2	Information within heavy bold line is not required by Federal Law.	
3. Generator's Name and Mailing Address FORMER IFG FACILITY - SYRACUSE ATTN: JIM HARTNETT ONE GENERAL MOTORS DRIVE SYRACUSE NY 13206				NYG1765593		
4. Generator's Telephone Number (3206)		6. US EPA ID Number M0D095038998		B. Generator's ID		
5. Transporter 1 (Company Name) TRI-STATE MOTOR TRANSIT CO		8. US EPA ID Number F L 0 0 0 6 9 2 1 3 4 0		C. State Transporter's ID		
7. Transporter 2 (Company Name) CSXT		10. US EPA ID Number O K D 0 6 5 4 3 8 3 7 6		D. Transporter's Telephone (800 234-8768)		
9. Designated Facility Name and Site Address SAFETY KLEEN, INC (LONE MT) 5 MILES E AND 1 MILE N OF 281 & 412 WAYNOKA, OK 73860				E. State Transporter's ID		
				F. Transporter's Telephone (800 327-5405)		
				G. State Facility ID		
				H. Facility Telephone (580 697-3500)		
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers Number	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. NON REGULATED MATERIAL PER CFR 40 & 49		012	DM	00660	G	EPA NONE STATE
b. NON REGULATED MATERIAL PER CFR 40 & 49		016	D F	00880	G	EPA NONE STATE
c.						EPA STATE
d.						EPA STATE
J. Additional Descriptions for Materials listed Above				K. Handling Codes for Wastes Listed Above		
a. LM 99-0607		c. <i>SD</i>		a. <input checked="" type="checkbox"/>	c. <input type="checkbox"/>	
b. LM 99-0569		d.		b. <input type="checkbox"/>	d. <input type="checkbox"/>	
15. Special Handling Instructions and Additional Information IN CASE OF EMERGENCY CALL: 1-800-424-8802; LOCAL RESPONSE 315-432-5000 <i>facility scale weight 14,214 pounds</i>						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name MAUREEN MARKERT for HARTNETT		Signature <i>Maureen Markert</i>		Mo. 11	Day 10	Year 1999
17. Transporter 1 Acknowledgement of Receipt of Materials						
Printed/Typed Name <i>Timothy L. Lane</i>		Signature <i>Timothy L. Lane</i>		Mo. 11	Day 11	Year 1999
18. Transporter 2 Acknowledgement of Receipt of Materials						
Printed/Typed Name DOLEENS BLAIR		Signature <i>Doleens Blair</i>		Mo. 11	Day 12	Year 1999
19. Discrepancy Indication Space 99-7517A-B						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name <i>Lisa Jensen</i>		Signature <i>Lisa Jensen</i>		Mo. 11	Day 20	Year 1999

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator's US EPA ID No. **NYD002239440** Manifest Document No. **00104**
~~65593~~

22. Page **2** Information in the shaded areas is not required by Federal law.

23. Generator's Name
FORMER IFG FACILITY - SYRACUSE ATTN: JIM HARTNETT
ONE GENERAL MOTORS DRIVE SYRACUSE, NY 13206

L. State Manifest Document Number
M. State Generator ID **NYD002239440**

24. Transporter **3** Company Name **BURLINGTON NORTHERN** 25. US EPA ID Number **MND048341788**

N. State Transporter's ID
O. Transporter's Phone **800-769-2673**

26. Transporter **4** Company Name **MP ENVIRONMENTAL** 27. US EPA ID Number **CAT000624247**

P. State Transporter's ID
Q. Transporter's Phone **888-637-8009**

28. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)

29. Containers No. Type 30. Total Quantity 31. Unit Wt/Vol R. Waste No.

	RM	No.	Type	Total Quantity	Unit Wt/Vol	Waste No.
a.						
b.						
c.						
d.						
e.						
f.						
g.						
h.						
i.						

S. Additional Descriptions for Materials Listed Above

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

33. Transporter **2** Acknowledgement of Receipt of Materials
Printed/Typed Name _____ Signature _____ Date **1 1**
34. Transporter **4** Acknowledgement of Receipt of Materials
Printed/Typed Name **Allen D Mowla** Signature **Allen D Mowla** Date **12 8 99**

35. Discrepancy Indication Space

GENERATOR HAZARDOUS WASTE FACILITY

NYG1765521

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

29147



HAZARDOUS WASTE MANIFEST
P.O. Box 12820, Albany, New York 12212

(Hazardous Waste Manifest 1/5/99)

Please type or print. Do not staple

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NYD002239440	Manifest Doc. No. 00106	2. Page 1 of 2	Information within heavy bold line is not required by Federal Law.	
3. Generator's Name and Mailing Address INLAND FISHER GUIDE CM 1 GENERAL MOTORS DR SYRACUSE, NY 13206				A. NYG1765521		
4. Generator's Telephone Number 315 432-5000				B. Generator's ID SAME		
5. Transporter 1 (Company Name) Buffalo Fuel Corp		6. US EPA ID Number NYR000045724		C. State Transporter's ID 98955F NY		
7. Transporter 2 (Company Name) Norfolk-Southern		8. US EPA ID Number VAD000650309		D. Transporter's Telephone (800) 677-8003		
9. Designated Facility Name and Site Address SAFETY-KLEEN, INC. (GRAYBACK MT) 3 MILES E, 7 MILES N OF EXIT 41 OFF I-80 CLIVE, ILLAH 84029		10. US EPA ID Number UTD991301748		E. State Transporter's ID		
				F. Transporter's Telephone (800) 635-5768		
				G. State Facility ID		
				H. Facility Telephone (801) 323-8900		
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers Number	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	
a. ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S. (polychlorinated biphenyls), 9, UN3077, PGIII, RQ		001	CM00040	Y	EPA None STATE B007	
b.					EPA STATE	
c.					EPA STATE	
d.					EPA STATE	
J. Additional Descriptions for Materials listed Above				K. Handling Codes for Wastes Listed Above		
a. GB920408 PCB Debris and/or rags		c.		a. <input checked="" type="checkbox"/>	c. <input type="checkbox"/>	
b.		d.		b. <input type="checkbox"/>	d. <input type="checkbox"/>	
15. Special Handling Instructions and Additional Information						
Accumulation start date: 8/25/99			Emergency Response: 1-800-424-8802			
Roll-off ID: xx VPCU 411779			Local Response: 315-432-5000			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name MAUREEN MARKERT for HARTNETT		Signature <i>Maureen Markert</i>		Mo. 11	Day 18	Year 99
17. Transporter 1 Acknowledgement of Receipt of Materials						
Printed/Typed Name Richard Tedoin		Signature <i>Richard Tedoin</i>		Mo. 11	Day 18	Year 99
18. Transporter 2 Acknowledgement of Receipt of Materials						
Printed/Typed Name P. ATZON		Signature <i>P. Atzon</i>		Mo. 11	Day 18	Year 99
19. Discrepancy Indication Space 1999009502						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name Betsy Fields		Signature <i>Betsy Fields</i>		Mo. 12	Day 09	Year 99

UNIFORM HAZARDOUS WASTE MANIFEST <i>(Continuation Sheet)</i>		21. Generator's US EPA ID No. NYD00223944000106				Manifest Document No. 00106		22. Page 2		Information in the shaded areas is not required by Federal law.	
		23. Generator's Name INLAND FISHER GUIDE, GM 1 GENERAL MOTORS DRIVE SYRACUSE, NY 13206						L. State Manifest Document Number NY61765521		M. State Generator's ID SAME	
24. Transporter <u>3</u> Company Name UPRR		25. US EPA ID Number NE0001792910				N. State Transporter's ID		O. Transporter's Phone 402-271-4400			
26. Transporter <u>4</u> Company Name McFarland + Hullinger		27. US EPA ID Number UTD9810954796				P. State Transporter's ID		Q. Transporter's Phone 801-252-2019			
28. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						29. Containers		30. Total Quantity		31. Unit	R. Waste No.
						No.		Type			
a.											
b.											
c.											
d.											
e.											
f.											
g.											
h.											
i.											
S. Additional Descriptions for Materials Listed Above Box # 411779						T. Handling Codes for Wastes Listed Above					
32. Special Handling Instructions and Additional Information											
TRANSPORTER	33. Transporter <u>3</u> Acknowledgement of Receipt of Materials								Date		
	Printed/Typed Name UPRR				Signature UPRR				Month Day Year 1 1		
	34. Transporter <u>4</u> Acknowledgement of Receipt of Materials								Date		
FACILITY	Printed/Typed Name JOSEPH SHINDER FOR MAC+HAC				Signature Joseph Shinder				Month Day Year 12 10 99		
	35. Discrepancy Indication Space										



- Deact.
- Neut
- Micro

LOAD SUMMARY RECORD

GM 044802

DESTINATION: STAB RCRA TSCA **B**

Arrived	Recopied	Departed	Dropped	Reviewed	Billing	Manifest Mailed
_____	_____		_____		12/21	12/21
Date 12-9-99		Order No. 29147		Load No. 1999009502		
Generator Inland Fisher				Hauler Mac Hae		
Truck No. 210		Container No. (s)/ Railcar No. 411779				
Container Type: ED <input checked="" type="checkbox"/> G TT FB V Other				Load Count (Rail Only): 1 2 3 4		
Operator Signature				Count		Date

12:42 PM 12 13 99
53160 LB
34600 LB TR
48560 LB NET

Load Washout Information		(Washout Stamp)
Washout: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Type: <input type="checkbox"/> Interior <input checked="" type="checkbox"/> Exterior
Washout Signature <i>[Signature]</i>		Date 12-13-99
Driver Signature <i>[Signature]</i>		Date 12-13-99

Item	Comments	Name	Date
C.S	Needs out of Service	_____	12-09-99
C.S	Needs total quantity		12-29-99

Tracking Information	Time	Initials	Comments
Arrival Complete:			
TSD Complete:			
Disposal Complete:			
Washout Complete:			
Departure Complete:			

Safety-Kleen, Grassy Mountain Facility, Tooele County, Utah

(WHITE - Facility CANARY - Generator PINK - Transporter GREEN - Receiving GOLD - Operations)

CERTIFICATE OF DISPOSAL

Safety-Kleen (Lone & Grassy Mountain), Inc.
Grassy Mountain Facility
3 mi. East, 7 mi. North of Exit 41*
Clive UT
EPA ID # - UTD991301748

As required by 40 CFR 761.218 (a), we are providing this Certificate of Disposal to INLAND FISHER GUIDE DIVISION O
to confirm that load # 1999009502

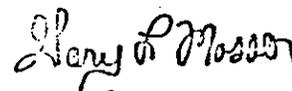
LINE	PROFILE No.	WASTE NAME	WEIGHT Kg	TYPE	DISPOSAL CELL	DISPOSED
1/A	GB92-0408	130576 PCB DEBRIS, AND/OR RAGS	22022.68	BULK	CB /F14 /1	12/13/99

shipped on manifest number NYD002239440-00106 was/were disposed in an EPA approved chemical waste landfill.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the person who, acting under my direct instructions, made the verification that this information is true, accurate and complete.

Cert. # 009458

Safety-Kleen (Lone and
Grassy Mountain), Inc., Grassy Mountain Facility
EPA ID# UTD991301748



Gary Mossor, General Manager

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator's US EPA ID No. N Y D 0 0 2 2 3 9 4 4 0 0 0 1 0 7				Manifest Document No. 0 0 1 0 7		22. Page 2		Information in the shaded areas is not required by Federal law.		
		23. Generator's Name INLAND FISHER GUIDE, GM 1 GENERAL MOTORS DRIVE SYRACUSE NY 13206						L. State Manifest Document Number NY61765611		M. State Generator's ID same		
24. Transporter 3 Company Name UPRR				25. US EPA ID Number W E D 0 0 1 7 9 2 9 1 0				N. State Transporter's ID		O. Transporter's Phone 402-271-4400		
26. Transporter 4 Company Name McFarland & Hullinger				27. US EPA ID Number U T D 9 8 0 9 5 4 7 9 6				P. State Transporter's ID		Q. Transporter's Phone 801-252-2019		
28. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						29. Containers No. Type		30. Total Quantity		31. Unit Wt/Vol	R. Waste No.	
												a.
S. Additional Descriptions for Materials Listed Above Box # 411924.						T. Handling Codes for Wastes Listed Above						
32. Special Handling Instructions and Additional Information												
TRANSPORTER	33. Transporter 3 Acknowledgement of Receipt of Materials						Date					
	Printed/Typed Name UPRR				Signature UPRR		Month Day Year 1 1					
TRANSPORTER	34. Transporter 4 Acknowledgement of Receipt of Materials						Date					
	Printed/Typed Name NEAL W Dymock				Signature <i>[Signature]</i>		Month Day Year 12 15 88					
FACILITY	35. Discrepancy Indication Space											



safety-kleen.

- Deact.
- Neut
- Micro

LOAD SUMMARY RECORD

GM 044996

DESTINATION: STAB RCRA TSCA B

Arrived	Reconciled	Departed	Dropped	Reviewed	Billing	Manifest Mailed
		A	✓	A	1/21	12/21
Date	Order No.	Load No.				
12-15-99	29146	1999009700				
Generator			Hauler			
Inland Fisher			Molitor			
Truck No.	Container No. (s)/ Railcar No.					
1000	41197A					
Container Type:			Load Count (Rail Only):			
ED <u>G</u> TT FB V Other			1 2 3 4			
Operator Signature			Count	Date		

12:31 PM 12 20 99

72520 LB
34600 LB TR

37920 LB NET

Load Washout Information		(Washout Stamp)
Washout:	Type:	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Interior <input type="checkbox"/> Exterior <input checked="" type="checkbox"/>	
Washout Signature	Date	
<i>[Signature]</i>	12-20-99	
Driver Signature	Date	
<i>[Signature]</i>	12-20-99	

Item	Comments	Name	Date

Tracking Information	Time	Initials	Comments
Arrival Complete:			
TSD Complete:			
Disposal Complete:			
Washout Complete:			
Departure Complete:			

Safety-Kleen, Grassy Mountain Facility, Tooele County, Utah

(WHITE - Facility CANARY - Generator PINK - Transporter GREEN - Receiving GOLD - Operations)

CERTIFICATE OF DISPOSAL

Safety-Kleen (Lone & Grassy Mountain), Inc.
Grassy Mountain Facility
3 mi. East, 7 mi. North of Exit 41*
Clive UT
EPA ID # - UTD991301748

As required by 40 CFR 761.218 (a), we are providing this Certificate of Disposal to INLAND FISHER GUIDE DIVISION O
to confirm that load # 1999009700

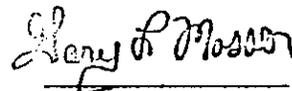
LINE	PROFILE No.	WASTE NAME	WEIGHT Kg	TYPE	DISPOSAL CELL	DISPOSED
1/A	GB92-0408	130576 PCB DEBRIS, AND/OR RAGS	17197.28	BULK	CB /F12 /1	12/20/99

shipped on manifest number NYD002239440-00107 was/were disposed in an EPA approved chemical waste landfill.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the person who, acting under my direct instructions, made the verification that this information is true, accurate and complete.

Cert. # 009442

Safety-Kleen (Lone and
Grassy Mountain), Inc., Grassy Mountain Facility
EPA ID# UTD991301748



Gary Mossor, General Manager

NYG1764549

29808



HAZARDOUS WASTE MANIFEST
P.O. Box 12820, Albany, New York 12212

(Hazardous Waste Manifest 1/5/99)

Please type or print. Do not staple

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NYD00223944000108	Manifest Doc. No. 00108	2. Page 1 of 2	Information within heavy bold line is not required by Federal Law.
3. Generator's Name and Mailing Address INLAND FISHER GUIDE GM 1 GENERAL MOTORS DR SYRACUSE, NY 13206			A. NYG1764549		B. Generator's ID SAME
4. Generator's Telephone Number (315 432-5000)		6. US EPA ID Number NYR000045724		C. State Transporter's ID 98955F NY	
5. Transporter 1 (Company Name) BUFFALO FUEL CORP		7. Transporter 2 (Company Name) NORFOLK - SOUTHERN		D. Transporter's Telephone (800) 677-8003	
9. Designated Facility Name and Site Address SAFETY-KLEEN, INC. (GRAYBACK MT) 3 MILES E, 7 MILES N OF EXIT 41 OFF I-80 CLIVE, UTAH 84029		10. US EPA ID Number UTD991301748		E. State Transporter's ID	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number) a. ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S. (polychlorinated biphenyls), 9, UN3077, PGIII, RQ		12. Containers Number Type 0 0 1 C M		13. Total Quantity 0 0 0 2 3	
				14. Unit Wt/Vol Y	
				I. Waste No. EPA none STATE B007	
				EPA STATE	
				EPA STATE	
				EPA STATE	
J. Additional Descriptions for Materials listed Above a GB920408 PCB debris and/or rags		K. Handling Codes for Wastes Listed Above a <input checked="" type="checkbox"/> L			
b		b <input type="checkbox"/>			
15. Special Handling Instructions and Additional Information Roll-off ID: UPCU 410620		Emergency Response: 1-800-424-8802 Local Response: 315-432-5000			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name Maureen Markert for James Hartnett		Signature <i>Maureen Markert</i>		Mo. Day Year 11 21 08 1999	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Richard Jordan		Signature <i>Richard Jordan</i>		Mo. Day Year 11 21 08 1999	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name TEGAY ATZROT		Signature <i>Tegay Atzrot</i>		Mo. Day Year 11 21 08 1999	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name S ANDERSON		Signature <i>S Anderson</i>		Mo. Day Year 11 28 08 1999	

UNIFORM HAZARDOUS WASTE MANIFEST <i>(Continuation Sheet)</i>		21. Generator's US EPA ID No. NYD00223944000108				Manifest Document No.		22. Page		Information in the shaded areas is not required by Federal law.	
		23. Generator's Name INLAND FISHER GUIDE GM 1 GENERAL MOTORS DR SYRACUSE, NY 13206		25. US EPA ID Number NED001792910				N. State Manifest Document Number NYG1764549		M. State Generator's ID SAME	
24. Transporter <u>3</u> Company Name UPRR		27. US EPA ID Number UTD980954796				N. State Transporter's ID		O. Transporter's Phone 402-271-4400		P. State Transporter's ID	
26. Transporter <u>4</u> Company Name MCFARLAND & HULLINGER		27. US EPA ID Number UTD980954796				Q. Transporter's Phone 801-252-2019					
28. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						29. Containers		30. Total		31. Unit	
						No.		Quantity		Wt/Vol	
a. <input type="checkbox"/> HM											
b.											
c.											
d.											
e.											
f.											
g.											
h.											
i.											
S. Additional Descriptions for Materials Listed Above Box # 410620						T. Handling Codes for Wastes Listed Above					
32. Special Handling Instructions and Additional Information											
33. Transporter <u>3</u> Acknowledgement of Receipt of Materials											
Printed/Typed Name UPRR						Signature UPRR			Date Month Day Year		
34. Transporter <u>4</u> Acknowledgement of Receipt of Materials											
Printed/Typed Name						Signature			Date Month Day Year		
35. Discrepancy Indication Space											

GENERATOR FACILITY TRANSPORTER



- Deact.
- Neut.
- Micro

LOAD SUMMARY RECORD

GM 041725

DESTINATION: STAB RCRA TSCA **B**

Arrived <input checked="" type="checkbox"/>	Reconciled <input checked="" type="checkbox"/>	Departed	Dropped <input checked="" type="checkbox"/>	Reviewed	Billing <input checked="" type="checkbox"/>	Manifest Mailed <input checked="" type="checkbox"/>
Date 12/28	Order No. 29808	Load No. 1999010049				
Generator INLAND FISHER			Hauler MCWHC			
Truck No. 212	Container No. (s)/ Railcar No. 410620					
Container Type: ED <input checked="" type="checkbox"/> TT FB V Other			Load Count (Rail Only): 1 2 3 4			
Operator Signature			Count	Date		

01:35 PM 01 05 00
57900 LB
43760 LB TR
14140 LB NET

Load Washout Information		(Washout Stamp)
Washout: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Type: Interior <input type="checkbox"/> Exterior <input checked="" type="checkbox"/>	1
Washout Signature <i>Joseph Shunich</i>	Date 1-5-00	
Driver Signature <i>Joseph Shunich</i>	Date 1-5-00	

Item	Comments	Name	Date

Tracking Information	Time	Initials	Comments
Arrival Complete:			
TSD Complete:			
Disposal Complete:			
Washout Complete:			
Departure Complete:			

CERTIFICATE OF DISPOSAL

Safety-Kleen (Lone & Grassy Mountain), Inc.
Grassy Mountain Facility
3 mi. East, 7 mi. North of Exit 41*
Clive UT
EPA ID # - UTD991301748

As required by 40 CFR 761.218 (a), we are providing this Certificate of Disposal to INLAND FISHER GUIDE DIVISION O
to confirm that load # 1999010049

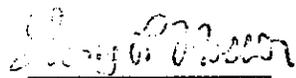
LINE	PROFILE No.	WASTE NAME	WEIGHT Kg	TYPE	DISPOSAL CELL	DISPOSED
1/A	GB92-0408	130576 PCB DEBRIS, AND/OR RAGS	6412.70	BULK	CB /G14 /2	01/05/00

shipped on manifest number NYD002239440-00108 was/were disposed in an EPA approved chemical waste landfill.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 18 U.S.C. 2610), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the person who, acting under my direct instructions, made the verification that this information is true, accurate and complete.

Cert. # 009758

Safety-Kleen (Lone and
Grassy Mountain), Inc., Grassy Mountain Facility
EPA ID# UTD991301748



Gary Mossor, General Manager

NYG1765629

HAZARDOUS WASTE MANIFEST
P.O. Box 12820, Albany, New York 12212

(Hazardous Waste Manifest 1/5/99)

Please type or print. Do not staple

In case of emergency or spill, immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Doc. No.		2. Page 1 of		Information within heavy bold line is not required by Federal Law.					
		N Y D 0 0 2 2 3 9 4 4 0 0 0 1 0 9				2							
3. Generator's Name and Mailing Address INLAND FISHER GUIDE GM 1 GENERAL MOTORS DR SYRACUSE, NY 13206						A. NYG1765629							
4. Generator's Telephone Number (315) 432-5000						B. Generator's ID SAME							
5. Transporter 1 (Company Name) BUFFALO FUEL CORP			6. US EPA ID Number N Y R 0 0 0 0 4 5 7 2 4			C. State Transporter's ID NY133741A		D. Transporter's Telephone (800) 677-8003					
7. Transporter 2 (Company Name) NORFOLK--SOUTHERN			8. US EPA ID Number V A D 0 0 0 6 5 0 3 0 9			E. State Transporter's ID		F. Transporter's Telephone (800) 635-5768					
9. Designated Facility Name and Site Address SAFETY-KLEEN, INC (GRAYBACK MT) 3 MILES E, 7 MILES N OF EXIT 41 OFF XEX I-80 CLIVE, UTAH 84029						10. US EPA ID Number U T D 9 9 1 3 0 1 7 4 8							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers Number Type		13. Total Quantity		14. Unit Wt/Vol		I. Waste No.	
a. ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S. (polychlorinated biphenyls), 9, UN3077, PGIII, RQ						0 0 1 c m		0 0 0 2 3		Y		EPA none STATE R007	
b.												EPA STATE	
c.												EPA STATE	
d.												EPA STATE	
J. Additional Descriptions for Materials listed Above						K. Handling Codes for Wastes Listed Above							
a. GB920408 pcb debris and/or rags						L <input type="checkbox"/> c <input type="checkbox"/>							
b.						b <input type="checkbox"/> d <input type="checkbox"/>							
15. Special Handling Instructions and Additional Information										Emergency Response: 1-800-424-8802			
Roll-off ID: UPCU 410415										Local Response: 315-432-5000			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name Maureen Markert for James Hartnett						Signature <i>Maureen Markert</i>		Mo. 11 Day 20 Year 1999					
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name Robert L. Simcox Jr.						Signature <i>Robert L. Simcox Jr.</i>		Mo. 11 Day 20 Year 1999					
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name Peggy Atzert						Signature <i>Peggy Atzert</i>		Mo. 11 Day 20 Year 1999					
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. 1999010055													
Printed/Typed Name SCOTT ANDERSON						Signature <i>Scott Anderson</i>		Mo. 11 Day 22 Year 1999					

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator's US EPA ID No.
NYD002239440

Manifest Document No.
00109
~~XXXXXXXXXX~~

22. Page
2

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

23. Generator's Name
INLAND FISHER GUIDE, GM
1 GENERAL MOTORS DRIVE
SYRACUSE, NY 13206

L. State Manifest Document Number
NYG1765 629

M. State Generator's ID
SAME

24. Transporter 3 Company Name
UPRR

25. US EPA ID Number
NED001792910

N. State Transporter's ID
402-271-4400

26. Transporter 4 Company Name
MCFARLAND & HULLINGER

27. US EPA ID Number
UTD980954796

O. Transporter's Phone
801-252-2019

28. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)

a.	RM	29. Containers		30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
		No.	Type			

S. Additional Descriptions for Materials Listed Above
Box # 410415

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

33. Transporter 3 Acknowledgement of Receipt of Materials
 Printed/Typed Name **UPRR**

Signature **UPRR**

Date
 Month Day Year

34. Transporter 4 Acknowledgement of Receipt of Materials
 Printed/Typed Name **GARALD S. VATES**

Signature **Gerald S. Vates**

Date
12-20-99

35. Discrepancy Indication Space

GENERATOR

TRANSPORTER FACILITY



- Deact.
- Neut
- Micro

LOAD SUMMARY RECORD

GM 041732

DESTINATION: STAB RCRA TSCA B

Arrived <input checked="" type="checkbox"/>	Reconciled <input checked="" type="checkbox"/>	Departed	Dropped	Reviewed	Billing <u>110</u>	Manifest Mailed <u>110</u>
Date <u>12/28</u>	Order No. <u>29809</u>	Load No. <u>1999010055</u>				
Generator <u>INLAND FISHER</u>			Hauler <u>MCNTIC</u>			
Truck No. <u>166</u>	Container No. (s)/ Railcar No. <u>410415</u>					
Container Type: ED <input checked="" type="checkbox"/> TT FB V Other				Load Count (Rail Only):		
				1	2	3
Operator Signature				Count	Date	

09:06 AM 01 06 00
50520 LB
32160 LB TR
18360 LB NET

Load Washout Information			(Washout Stamp)
Washout: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Type: Interior Exterior		
Washout Signature <u>[Signature]</u>	Date <u>1-6-00</u>		
Driver Signature <u>[Signature]</u>	Date <u>1-6-00</u>		

Item	Comments	Name	Date

Tracking Information	Time	Initials	Comments
Arrival Complete:			
TSD Complete:			
Disposal Complete:			
Washout Complete:			
Departure Complete:			

CERTIFICATE OF DISPOSAL

Safety-Kleen (Lone & Grassy Mountain), Inc.
Grassy Mountain Facility
3 mi. East, 7 mi. North of Exit 41*
Clive UT
EPA ID # - UTD991301748

As required by 40 CFR 761.218 (a), we are providing this Certificate of Disposal to INLAND FISHER GUIDE DIVISION O
to confirm that load # 1999010055

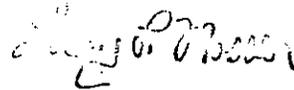
LINE	PROFILE No.	WASTE NAME	WEIGHT Kg	TYPE	DISPOSAL CELL	DISPOSED
1/A	GB92-0408	130576 PCB DEBRIS, AND/OR RAGS	8326.53	BULK	CB /F12 /1	01/06/00

shipped on manifest number NYD002239440-00109 was/were disposed in an EPA approved chemical waste landfill.

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the person who, acting under my direct instructions, made the verification that this information is true, accurate and complete.

Cert. # 009904

Safety-Kleen (Lone and
Grassy Mountain), Inc., Grassy Mountain Facility
EPA ID# UTD991301748



Gary Mossor, General Manager

NYG 1319328

DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST
P.O. Box 12820, Albany, New York 12212

(Hazardous Waste Manifest 1/28/98)

Please type or print. Do not staple.

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NYD00223944000145		Manifest Doc. No. 1	2. Page 1 of 1		Information within heavy bold line is not required by Federal Law.			
3. Generator's Name and Mailing Address Former IFB Facility Syracuse One General Motors Drive Syracuse, NY 13206				ATTN: Jim Hartnett Rosevelt Hwy STE Massena, NY 13602		A. NYG 1319328				
4. Generator's Telephone Number (315) 764-2239				5. Transporter 1 (Company Name) TR. Stat Motor Transp. Co.		B. Generator's ID SAME				
5. Transporter 1 (Company Name)				6. US EPA ID Number MUD1095038998		C. State Transporter's ID (417) 624-3131				
7. Transporter 2 (Company Name)				8. US EPA ID Number		D. Transporter's Telephone ()				
9. Designated Facility Name and Site Address Safety Klean, Inc. (Arasunte) 11600 N. Aptus Rd Arasunte, UT 84122				10. US EPA ID Number UTD918115521177		E. State Transporter's ID				
						F. Transporter's Telephone ()				
						G. State Facility ID				
						H. Facility Telephone (801) 323-8171				
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)					12. Containers Number Type		13. Total Quantity		14. Unit Wt/Vol	I. Waste No.
a. RA, Polychlorinated biphenyls, Mixture, 9, UN 2315, (6.2) II					0 03 DM 0 06 12		K		EPA	STATE Bool
b. RA, Environmentally Hazardous substance, liquid; N.O.S. (resol, PCB 2ppm) 9, UN 3092, III (resol)					0 03 AM 0 01 65		G		EPA	STATE Bool
c.									EPA	STATE
d.									EPA	STATE
J. Additional Descriptions for Materials listed Above						K. Handling Codes for Wastes Listed Above				
a. AP 2219334						b. <input checked="" type="checkbox"/> B c. <input type="checkbox"/>				
b. AP 2219333						d. <input checked="" type="checkbox"/> B d. <input type="checkbox"/>				
15. Special Handling Instructions and Additional Information In case of emergency call 24 hours: 315-764-2239										
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.										
Printed/Typed Name Edwin B. Rahn for James Hartnett				Signature <i>Edwin B. Rahn</i>				Mo. Day Year 10 21 00		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name MAYTON SMITH				Signature <i>Mayton Smith</i>				Mo. Day Year 10 21 00		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name				Signature				Mo. Day Year		
19. Discrepancy Indication Space										
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.										
Printed/Typed Name				Signature				Mo. Day Year		

Shipping Bill of Lading

1. Generator's US EPA ID No. (If any) **NYID0102239440** 2. Gen. BOL No. **00001**

3. Generator's Name and Mailing Address
Former JFG Facility - Syracuse
One General Motors Dr.
Syracuse, NY 13206
 Generator's Phone **(315) 764-2239**

4. Transporter 1 Company Name
TR, State Motor Transit Co. MD0095038998 417 624-3131

5. Transporter 2 Company Name

6. Transporter 3 Company Name

7. Transporter 4 Company Name

8. Designated Facility Name and Site Address
Safety Kleen, INC. (Linc Mt Facility)
5 mile E and 1 mile N of Hwy 281 + 412
Waynoka, OK 73860 OKD065438376 580 697-3500

9. U.S. DOT Description (including Proper Shipping Name)	10. Containers		11. Total Quantity	12. Unit Wt/Vol	13. Waste Profile Sheet #
	No.	Type			
a. NON REGULATED MATERIAL PER CFR 40 + 49	002	DM	75	G	WPS 321563
b. NON REGULATED MATERIAL PER CFR 40 + 49	011	DM	605	G	WPS 321562

14. Additional Descriptions for Materials Listed Above
9a; LM 99-0765; Mold storage sumps;
9b; LM 99-0766; Trench Fly Ash SWD 33249

15. Special Handling Instructions and Additional Information
DRIVER Ld: EPR SW 5660

IN CASE OF EMERGENCY CALL: 315-764-2239

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

Printed/Typed Name: **JAMES F. HARTNETT** Signature: *James F. Hartnett* Month Day Year: **01 25 00**

17. Transporter 1 Acknowledgement of Receipt of Materials
 Printed/Typed Name: **HENRY ARIKIAN** Signature: *Henry Arikian* Month Day Year: **01 25 00**

18. Transporter 2 Acknowledgement of Receipt of Materials
 Printed/Typed Name: _____ Signature: _____ Month Day Year: _____

19. Transporter 3 Acknowledgement of Receipt of Materials
 Printed/Typed Name: _____ Signature: _____ Month Day Year: _____

20. Transporter 4 Acknowledgement of Receipt of Materials
 Printed/Typed Name: _____ Signature: _____ Month Day Year: _____

21. Discrepancy Indication Space
00-735 A-B

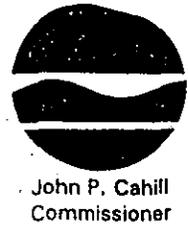
22. Facility Owner or Operator: Certification of Receipt of non-hazardous materials covered by this Bill of Lading except as noted in item 21.
 Printed/Typed Name: **Lisa Jensen** Signature: *Lisa Jensen* Month Day Year: **01 21 00**

- First Copy: Return to Generator
- Second Copy: Transporter #1
- Third Copy: Transporter #2
- Fourth Copy: Transporter #3
- Fifth Copy: Transporter #4
- Sixth Copy: Generator Copy
- Seventh Copy: Facility Copy

RECEIVED BY STATE

**NYSDEC approval letters for
facility cleaning IRM work
in leasehold spaces**

New York State Department of Environmental Conservation
Division of Environmental Remediation
Bureau of Central Remedial Action, Room 228
50 Wolf Road, Albany, New York 12233-7010
Phone: (518) 457-1741 FAX: (518) 457-7925



January 4, 2000

James Hartnett
General Motors Corp.
Rte. 37 East, Box 460
Massena, NY 13662-0460

Re: Former IFG Facility (Registry # 734057) and Ley Creek Deferred Media
NYSDEC Order on Consent Index # D-7-0001-97-06
Redevelopment Addendum - Approval of Facility Cleaning IRM Work in Carpenter Industries
Leasehold Space

Dear Mr. Hartnett:

The Engineer's Certification of Completion for the Phase 1 Facility Cleaning Interim Remedial Measure (IRM) for the portion of the Site indicated as the Carpenter Industries Leasehold Space ("Leasehold Space") (see enclosed map) has been received by the Department. A Certification of Completion is one of the items required under terms of the above referenced Order on Consent in order for an IRM to be complete. Submittal of this Certification, along with the verification data from the 1997 facility cleaning, allows conditional approval of the Phase 1 Cleaning IRM for the Carpenter Industries Leasehold Space. The Department approves the facility cleaning IRM completed within the Carpenter Industries Leasehold Space provided that the following conditions are and continue to be met.

1. This Leasehold Space shall remain free of the remaining contamination from other areas of the building;
2. No vehicular or personnel traffic may enter this Leasehold Space from an area of the building for which the Facility Cleaning IRM has not been completed without first decontaminating the equipment or clothing in accordance with the Facility Cleaning IRM Work Plan; and,
3. An approvable Engineering Report must be submitted to the Department. A draft Engineering Report is to be submitted within 60 days of completion of the Phase 1 IRM and Initial Phase 2 IRM activities.

If you have any questions you may contact me at 518-457-1641.

Sincerely,

Susan Benjamin

Susan Benjamin, P.E.

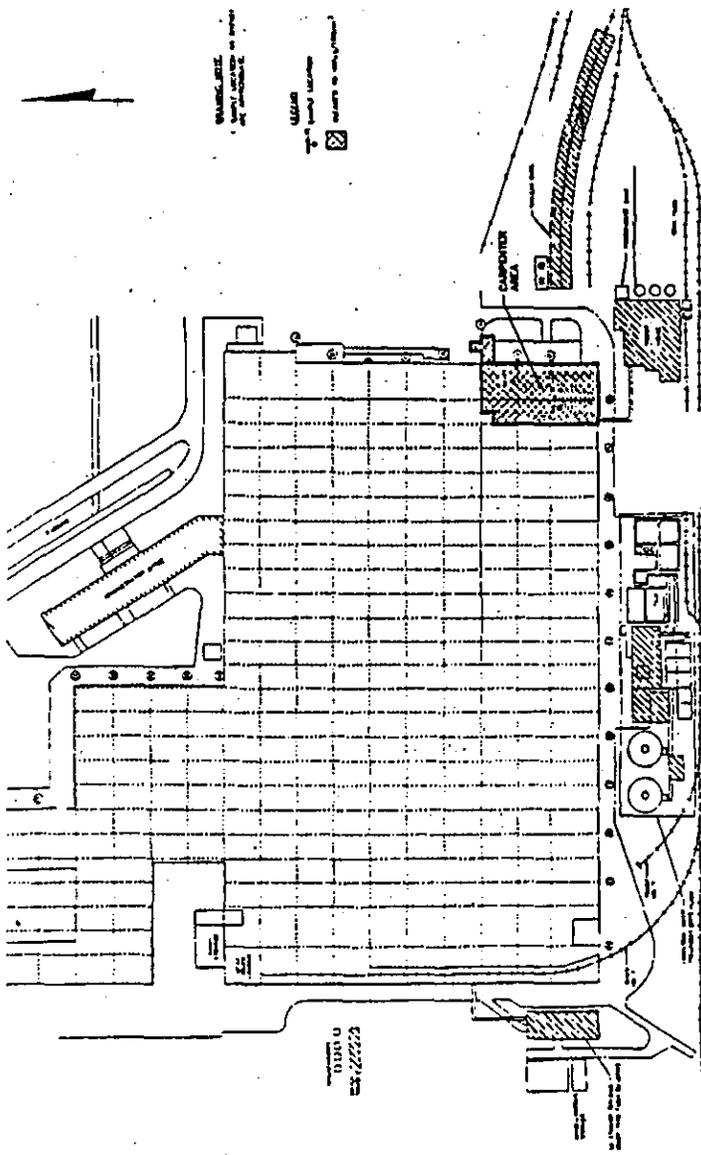
Project Manager

Bureau of Central Remedial Action

Division of Environmental Remediation

Enclosure

cc: L. Fitzpatrick
W. McFarland



New York State Department of Environmental Conservation
Division of Environmental Remediation
Bureau of Central Remedial Action, Room 228
50 Wolf Road, Albany, New York 12233-7010
Phone: (518) 457-1741 FAX: (518) 457-7925



John P. Cahill
Commissioner

January 4, 2000

James Hartnett
General Motors Corp.
Rte. 37 East, Box 460
Massena, NY 13662-0460

Re: Former IFG Facility (Registry # 734057) and Ley Creek Deferred Media
REVA Plastics Stipulation between the NYSDEC and General Motors
Redevelopment Addendum - Approval of Facility IRM Work in REVA Plastics Leasehold Space

Dear Mr. Hartnett:

The Engineer's Certification of Completion for the Phase 1 Facility Cleaning Interim Remedial Measure (IRM) for the portion of the Site indicated as the REVA Plastics Leasehold Space ("Leasehold Space") (see enclosed map) has been received by the Department. A Certification of Completion is one of the items required under terms of the Order on Consent (Index # D-7-0001-97-06) in order for an IRM to be complete. Submittal of this Certification, along with the verification data from the 1997 facility cleaning allows conditional approval of the Phase 1 Cleaning IRM for the REVA Plastics Leasehold Space only. The Department approves the facility cleaning IRM completed within the Leasehold Space provided that the following conditions are and continue to be met.

1. This Leasehold Space shall remain free of the remaining contamination from other areas of the building;
2. No vehicular or personnel traffic may enter this Leasehold Space from an area of the building for which the Facility Cleaning IRM has not been complete without first decontaminating the equipment or clothing in accordance with the Facility Cleaning IRM Work Plan; and,
3. An approvable Engineering Report must be submitted to the Department. A draft Engineering Report is to be submitted within 60 days of completion of the Phase 1 IRM and Initial Phase 2 IRM activities.

If you have any questions you may contact me at 518-457-1641.

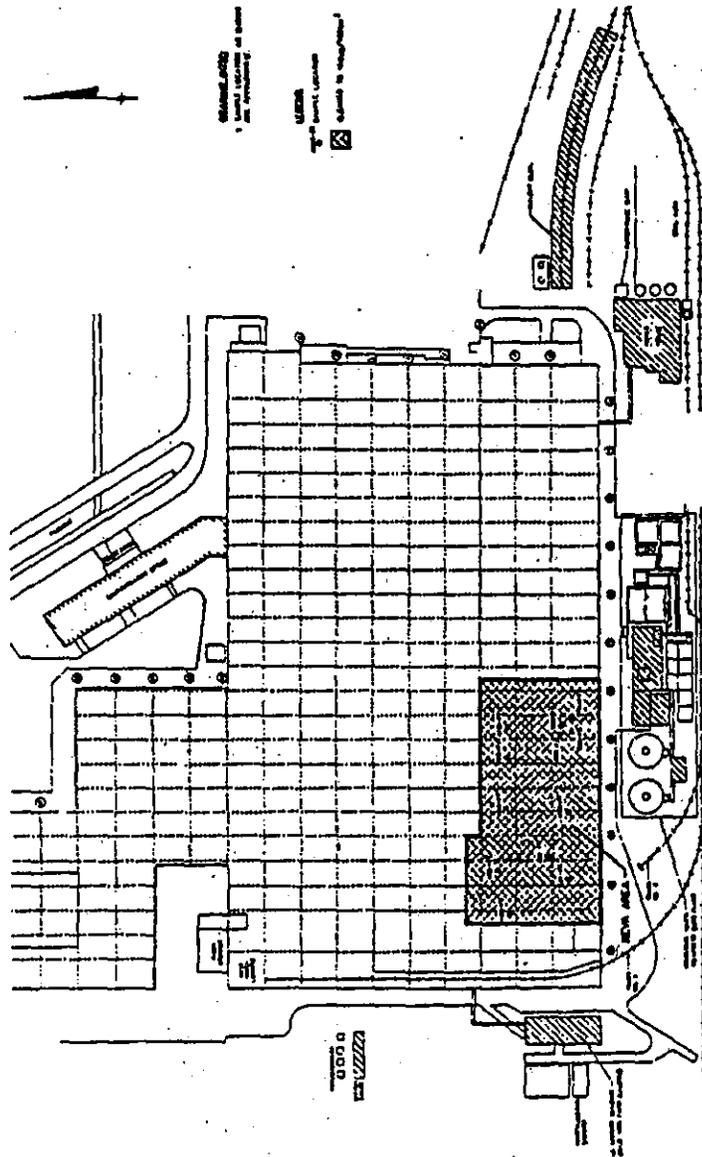
Sincerely,

Susan Benjamin

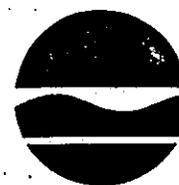
Susan Benjamin, P.E.
Bureau of Central Remedial Action
Division of Environmental Remediation

Enclosure

cc: L. Fitzpatrick
W. McFarland



New York State Department of Environmental Conservation
Division of Environmental Remediation
Bureau of Central Remedial Action, Room 228
50 Wolf Road, Albany, New York 12233-7010
Phone: (518) 457-1741 FAX: (518) 457-7925



John P. Cahill
Commissioner

January 4, 2000

James Hartnett
General Motors Corp.
Rte. 37 East, Box 460
Massena, NY 13662-0460

Re: Former IFG Facility (Registry # 734057) and Ley Creek Deferred Media
NYSDEC Order on Consent Index # D-7-0001-97-06
Redevelopment Addendum - Approval of Facility Cleaning IRM Work in New Venture Gear
Leasehold Space

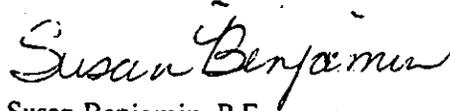
Dear Mr. Hartnett:

The Engineer's Certification of Completion for the Phase 1 Facility Cleaning Interim Remedial Measure (IRM) for the portion of the Site indicated as the New Venture Gear Leasehold Space ("Leasehold Space") (see enclosed map) has been received by the Department. A Certification of Completion is one of the items required under terms of the above referenced Order on Consent in order for an IRM to be complete. Submittal of this Certification allows approval of the Phase 1 Cleaning IRM for the New Venture Gear Leasehold Space only. The Department approves the facility cleaning IRM completed within the New Venture Gear Leasehold Space providing the following conditions are and continue to be met.

1. This Leasehold Space shall remain free of the remaining contamination from other areas of the building; and,
2. No vehicular or personnel traffic may enter this Leasehold Space from an area of the building for which the Facility Cleaning IRM has not been complete without first decontaminating the equipment or clothing in accordance with the Facility Cleaning IRM Work Plan; and,
3. An approvable Engineering Report must be submitted to the Department. A draft Engineering Report is to be submitted within 60 days of completion of the Phase 1 IRM and Initial Phase 2 IRM activities.

If you have any questions you may contact me at 518-457-1641.

Sincerely,

A handwritten signature in cursive script that reads "Susan Benjamin".

Susan Benjamin, P.E.
Project Manager
Bureau of Central Remedial Action
Division of Environmental Remediation

Enclosure

cc: L. Fitzpatrick
W. McFarland

New Venture Gear Space

