HISCOCK & BARCLAY

THOMAS F. WALSH
PARTNER

2000 HSBC PLAZA
ROCHESTER / NEW YORK 14604-2404
T 585.325.7570 / F 585.325.5458

DIRECT DIAL 585.295.4414
DIRECT FAX 585.295.8443
TWALSH@HISCOCKBARCLAY.COM

May 3, 2006

MAY 05 2006

BY U.S. MAIL

Mr. Stephen G. Malsan, P.E.
New York State Department of Environmental Conservation
Division of Solid and Hazardous Materials
Bureau of Hazardous Waste & Radiation Management, 9th Floor
625 Broadway
Albany, New York 12233-7258

Re: RCRA Sampling - Former Foster Wheeler Energy Corporation Plant
North Dansville, Livingston County, New York
EPA Identification No. NYD002205599

Dear Steve:

As you know, we are local counsel to Foster Wheeler Energy Corporation ("FWEC") for the sale of the above-referenced plant in North Dansville, New York to Dansville Properties, LLC, including the completion of any obligations under Resource Conservation and Recovery Act ("RCRA").

This letter is in response to your letter of February 17, 2006 to Mr. Bruce Studley of FWEC summarizing the results of the Preliminary Review and Visual Site Inspection ("PR & SI") conducted by the Department on December 22, 2005.

The purpose of the PR & SI was to assess the Dansville plant in regard to its past status as a generator of hazardous waste and an interim status treatment, storage and disposal facility ("TSDF"). In that regard, you conducted a final inspection of several solid waste management units ("SWMUs") and areas of concern ("AOCs") that the Department had identified in order to facilitate completion of activities required under the Department's corrective action authority and, potentially, to end the RCRA TSDF post-closure status of the plant.

As a preliminary matter, let me convey to you, FWEC's gratitude for your willingness to conduct the PR & SI so close to the holidays in order to help facilitate the sale of the Dansville plant. As you can imagine, Dansville Properties, LLC, as the potential owner and current tenant of the property, was intensely interested in the preliminary findings of the Department from the PR & SI. FWEC, therefore, also deeply appreciated your willingness to share the Department's

preliminary findings with representatives of FWEC and Dansville Properties, LLC at the conclusion of the PR & SI on December 22, 2005.

In fact, Dansville Properties, LLC had its environmental consultant for the pre-acquisition environmental assessment of the Dansville plant, Labella Associates, P.C. ("LaBella"), conduct limited testing in response to the Department's preliminary findings even before FWEC received your letter of February 17, 2006 and its attached Preliminary Review and Visual Site Inspection report, dated February 2006. Then, after our receipt of that PR & SI Report, Dansville Properties, LLC directed LaBella to conduct an additional round of testing to address the remaining concerns of the Department set forth in the PR & SI report.

A copy of LaBella's April 11, 2006 letter report to Buyer's attorney, Mr. Frank Pavia, on the results of that testing is enclosed for your reference. The LaBella letter report presents the findings of sampling conducted at the Dansville plant in response to your letter of February 17, 2006 and the PR & SI Report.

During the PR & SI, the Department concluded that 22 of the Department-designated SWMUs required no further action. But, the Department also concluded that there were two AOCs that would require further evaluation. Those were a sump pump area identified as AOC #1 and two floor drains in Tube 2 identified as AOC #2. The Department further requested copies of any waste characterization results for several drums of waste noted on the property during the PR & SI that had been generated during cleaning of the plant by Dansville Properties, LLC's new subtenant, American Motive Power, Inc. As stated in the LaBella letter report, the drummed material was not generated from any industrial, manufacturing or mechanical process being conducted at the plant. Rather, it was only associated with the efforts of American Motive Power, Inc. to clean up the plant and equipment that existed on the property when it took possession.

LaBella's enclosed letter report includes the results of the sampling and analytical testing requested to address the Department's remaining concerns for AOC # 1 and AOC #2. It also reviews the limited information available from the waste characterization of the drums of waste noted during the PR & SI. Although FWEC understood the Department's request for analytical data on the drummed materials, apparently the waste disposal contractor retained by American Motive Power, Inc. to characterize, transport, and dispose of the cleaning wastes, Clean Harbors, did not conduct a laboratory analysis to characterize the wastes, relying instead on knowledge derived from handling similar wastes from the plant under long-term contracts with FWEC and on a spot check and pH test of each drum to confirm material type. FWEC apologizes for this miscommunication and the resulting lack of data. The information derived from Clean Harbor's spot check, waste profiles sheets for previous waste streams from the plant, however, and the bill of lading for the drummed wastes are included as Attachment D to the LaBella letter report.

As detailed in the LaBella letter report: 1) although some low concentrations of PCBs were detected in two of the four concrete samples taken from the AOC #1 sump, the

concentrations are less than the Department's recommended soil cleanup objectives, are below applicable hazardous waste characterization criteria, and are not indicative of a threat to human health; and 2) although petroleum-related volatile organic compounds were detected in sediment samples taken from the AOC #2 floor drains, the concentrations are relatively low, the levels do not appear to represent a remedial concern, and American Motive Power, Inc. reports that it removed and properly disposed of the sediments subsequent to LaBella's sampling effort.

Based on this evaluation, LaBella concluded that additional sampling is not warranted and recommended that FWEC submit LaBella's report to the Department in support of a request that the Department remove the plant from its designation as a RCRA generator and TSDF. We concur.

The Department's PR & SVI report documents the thorough review conducted of the Dansville plant history, and the thorough walk-through inspection of the plant conducted on December 22, 2005, and demonstrates the completion of all closure and post-closure activities for the 22 SWMUs identified by the Department. Similarly, LaBella's letter report of April 11, 2006 documents the environmental status of the two AOCs for which the Department requested further evaluation. FWEC, therefore, requests that the Department:

1) remove the Dansville plant from the list of active RCRA generator facilities;

2) remove the Dansville plant from the list of active RCRA TSDFs;

3) find that no further action is necessary for the two AOC's;

4) confirm that no further RCRA post-closure activities are required to make conditions at the Dansville plant protective of human health and the environment; and

5) authorize FWEC to terminate the current financial assurance for RCRA closure and post-closure activities, pursuant to 6 NYCRR §373-3.8(d) and (f) and 40 CFR 265 Subpart H.

The last finding is requested because it is justified by the preceding findings and because it is a necessary condition precedent to FWEC's obtaining the authorization of the U.S. Environmental Protection Agency terminate the outstanding TSDF "closure and post-closure care" financial assurance surety bond. The bond appears to date back to the early 1980s when FWEC initially declared its intent to become an interim status TSDF. By the terms of the bond, the surety company cannot release the bond until EPA authorizes it to do so. EPA will need confirmation from the Department, as the delegated agency, that post-closure activities have been completed.

Thank you for your cooperation in sorting through the RCRA issues associated with the closure and sale of the Dansville plant. Please do not hesitate to contact me if you have any questions regarding FWEC's request.

Very truly yours,

Thomas F. Walsh

Thomas F. Walsh

Enclosure
Cc (w/ enc.): Wm. Lee, FWEC
J. Von Kaenel, Esq.
D. Stout, TTECI
S. Foti, Region 8
J. LaClair, Region 8
S. Hanna, Regional Director
F. Pavia, Esq.

Engineering
Architecture
Environmental

LABELLA
Associates, P.C.

300 State Street, Suite 201, Rochester, NY 14614

Phone 585.454.6110
Fax 585.454.3066
www.labellapc.com

April 11, 2006

Frank C. Pavia, Esq.
Boylan, Brown, Code, Vigdor and Wilson, LLP
2400 Chase Square
Rochester, New York 14604

APR 12 2006

Re: RCRA Sampling
Former Foster Wheeler Energy Corporation Plant
9431 Foster Wheeler Road; Dansville, New York 14437
LaBella Project No. 205239.01

Dear Mr. Pavia:

This letter presents the findings of recent sampling conducted at the former Foster Wheeler Energy Corporation (FWEC) Plant located at 9431 Foster Wheeler Road, in the Town of Dansville, Livingston County, New York hereafter referred to as "the Facility."

Background

The sampling was requested by New York State Department of Environmental Conservation (NYSDEC) during a site visit on December 22, 2005. The site visit was being conducted in regards to the past status of the Facility as a Resource Conservation and Recovery Act (RCRA) generator facility and a RCRA interim status Treatment, Storage and Disposal (TSD) facility. The Facility visit was coordinated between representatives of FWEC and the NYSDEC to conduct a final inspection of several solid waste management units (SWMUs) previously operated at the Facility in order to complete the NYSDEC review of the Facility under its corrective action authority and to facilitate an end to post-closure status of the Facility.

LaBella Associates, P.C. (LaBella) was on-site during the site visit at which time the NYSDEC requested that additional sampling be conducted in relation to oil stained concrete floors and the presence of water in a sump (i.e., concrete pit) within the building identified as Tube 3 and two floor drains with sediments in the building identified as Tube 2. Initially, LaBella conducted sampling activities on December 30, 2005 in order to proactively respond to NYSDEC verbal requests. However, subsequent to LaBella's initial sampling, the NYSDEC submitted a Preliminary Review and Visual Site Inspection (PR & VSI) Report, dated February 2006. The PR & VSI Report concluded that twenty-two (22) Solid Waste Management Units (SWMUs) required "No Further Action"; however, two areas of concern (AOCs) were identified and required additional evaluation. The following provides a summary of the AOCs and the results of the additional evaluation:

AOC #1: Sump Pump Area – The NYSDEC requested that concrete core samples be collected from the sump pump area and tested for polychlorinated biphenyls (PCBs). In addition, the NYSDEC requested the analytical test results from disposal characterization of the drums containing waste produced during cleaning at the Facility.

AOC #2: Floor Drains in Tube 2 – The NYSDEC requested sampling of floor drain sediment/grit for PCBs and solvents.

The initial sampling conducted by LaBella on December 30, 2005 did not include sampling for PCBs in the floor drain grit (i.e., the grit was originally sampled for solvents only) or of concrete from within the pit in Tube 2 (i.e., initially concrete samples were collected from stained areas of the floor outside the pit area). As such, LaBella conducted supplemental sampling on March 7, 2006.

[*Note: The Facility was an active RCRA generator and RCRA interim status TSD facility while being operated by FWEC; however, the FWEC operations ceased in 2003 and the Facility has since been sold to Dansville Properties, LLC. In addition, a subsurface soil and groundwater study was conducted at the Facility as part of the real estate transaction. The subsurface investigation did identify low-levels of fuel-related petroleum hydrocarbons and low levels of chlorinated solvents in sporadic locations across the Facility. However, the majority of these chemical compounds were found at levels below relevant and applicable NYS standards and guidelines. One limited area of soil did contain elevated levels of fuel-related petroleum hydrocarbons at levels above NYSDEC recommended soil cleanup objectives (RSCOs). As such a copy of the Phase II Environmental Site Assessment: Subsurface Site Characterization (Phase II ESA) Report was provided to NYSDEC Division of Environmental Remediation (DER). Based on the report findings, the NYSDEC DER opened Spill #0551029 and requested additional soil and groundwater sampling in the area of petroleum-impacted soil. The additional work was completed by LaBella and summarized in a Supplemental Site Characterization Report, which was provided to NYSDEC DER. Based on the findings of the Supplemental Site Characterization Report the NYSDEC inactivated the Spill as stated in a November 23, 2005 letter from NYSDEC. A copy of the Spill inactivation letter is included as Attachment A.*]

Sampling

The sampling consisted of collecting/analyzing the following samples:

AOC #1: Sump Pump Area

- Two (2) samples of concrete collected on December 30, 2005 from an oil stained area within Tube 3 (designated Tube 3/Concrete Floor-1 and Tube 3/Concrete Floor-2) and analyzed for PCBs using United States Environmental Protection Agency (USEPA) Method 8082;
- One (1) sample of water collected on December 30, 2005 from a sump in Tube 3 (designated Tube 3/Sump) and analyzed for PCBs using USEPA Method 8082; and,
- Two (2) samples of concrete collected on March 7, 2006 from within the pit in Tube 3 and in proximity of the western sump located in the pit (designated Sump Conc. North and Sump Conc. East) and analyzed for PCBs using USEPA Method 8082.

AOC #2: Floor Drain in Tube 2

- Two (2) samples of sediment and grit collected on December 30, 2005 from two floor drains in Tube 2 (designated Tube 2/Floor Drain-1 and Tube 2/Floor Drain-2) and analyzed for Target Compound List (TCL) Volatile Organic Compounds (VOCs) using USEPA Method 8260; and,

- Two (2) sediment samples of sediment and grit collected on March 7, 2006 from two floor drains in Tube 2 (designated Tube 2/Floor Drain-1 [FD#1] and Tube 2/Floor Drain-2 [FD#2]) and analyzed for PCBs using USEPA Method 8260.

The approximate sample locations are shown on Figure 1 attached.

The concrete samples were collected by advancing a rotary hammer drill approximately 6-inches into the concrete and collecting the concrete chips/dust from the resulting holes. The concrete samples were then homogenized by the laboratory. The sediment samples and the water sample were grab samples collected directly from the drains/sump. All samples were collected in pre-cleaned laboratory jars and submitted under chain-of-custody control to Paradigm Environmental Services, Inc. (Paradigm). Paradigm is a New York State Department of Health (NYSDOH) Environmental Laboratory Approval Program (ELAP) certified laboratory for the parameters tested.

Analytical Results

A copy of the laboratory report is in Attachment B and a brief description of the analytical results is provided below.

AOC #1: Sump Pump Area

One PCB (Aroclor 1248) was detected above the reported laboratory detection limits in the two concrete samples collected from the area of staining within Tube 3 on December 30, 2005. However, the detected concentrations are 0.716 and 0.740 milligrams per kilogram (mg/Kg) or parts per million (ppm), are below the NYSDEC Technical and Administrative Guidance Memorandum (TAGM) 4046 recommended soil cleanup objective (RSCO) of 1 mg/kg for surface soils. In addition, the recently released Brownfield Cleanup Program (BCP) Guide draft Technical Support Document dated November 2005 includes Soil Cleanup Objectives (SCOs) for PCBs. The BCP Guide references an SCO for PCBs of 1 ppm for unrestricted use sites and an SCO for PCBs of 25 ppm for industrial sites. As such, the detected concentrations of PCBs in the concrete samples are below these applicable and relevant cleanup criteria. [*Note: Although these criteria are intended for soils, the 1 mg/kg is a conservative cleanup value for concrete.*]

The two concrete samples collected on March 7, 2006 from within the Tube 3 pit in proximity to the sump did not detect concentrations of PCBs above the reported laboratory detection limits.

The sample of water from the sump in Tube 3 did not detect concentrations of PCBs above the reported laboratory detection limits.

AOC #2: Floor Drain in Tube 2

Sediment sample Tube 2/Floor Drain-2 detected one VOC (m,p-Xylene) at a concentration slightly above the reported laboratory detection limits; however, the concentration detected is below NYSDEC recommended soil cleanup objectives (RSCOs) referenced in Technical and Administrative Guidance Memorandum (TAGM) 4046 as amended by supplemental tables dated August 22, 2001. Sediment sample Tube 2/Floor Drain-1 detected several petroleum related VOCs, as well as acetone and 2-

butanone at concentrations above the reported laboratory detection limit. The concentrations of xylenes, acetone, 2-butanone, and total VOCs exceed the NYSDEC RSCOs. Since some elevated petroleum VOCs were detected in sediment sample Tube 2/Floor Drain-1, this sample was also tested for ignitablity using USEPA method 1010 in order to confirm that the sediment is not a characteristic hazardous waste due to ignitability. The laboratory report indicated a flashpoint >70°C; therefore, the sediment is not a characteristic hazardous waste.

The two sediment/grit samples collected from Drain 1 and Drain 2 in Tube 2 on March 7, 2006 and tested for PCBs did not detect concentrations of PCBs above the reported laboratory detection limits.

Recent Waste Stream Characterization Information

During the December 22, 2005 site visit with the NYSDEC twenty-six (26) fifty-five gallon drums of various oils, coolant materials, and absorbent material was observed staged at the Facility. This waste stream consisted of liquids, absorbent materials, and floor sweepings associated with American Motive Power, Inc.'s (AMP) efforts to clean up both the Facility and equipment that was removed subsequent to AMP's possession of the Facility. The waste was not generated by either an industrial, manufacturing, or mechanical process being conducted at the Facility by either Dansville Properties, LLC or AMP.

AMP retained the services of Clean Harbors Environmental Services, Inc. (Clean Harbors) to characterize, transport, and dispose of this waste stream. It was also reported to Dansville Properties, LLC that Clean Harbors had previously provided waste characterization, transport, and disposal services for FWEC when it operated the Facility.

LaBella Associates contacted Clean Harbors to obtain waste profile and characterization information for the drummed waste stream that was observed by NYSDEC on December 22, 2005. Clean Harbors indicated that based on their long-term contracts with FWEC, they did not feel a need to characterize the waste. Furthermore, Clean Harbors indicated that similar waste streams from FWEC were based on generator knowledge and Clean Harbors provided historic waste profile sheets from the similar FWEC waste streams. The historic waste profile sheets are included in Attachment C. Clean Harbors did not conduct any pre-disposal analytical based characterization of the drummed material. Therefore, Clean Harbors was not able to provide any waste characterization of waste stream profiles that contained actual analytical data. However, a "spot check" of the drums was conducted to verify the material type. The spot check consisted of a confirming the material type and collecting a pH value for each drum. Clean Harbors provided the information from this internal spot check, waste profile sheets and the bill of lading for the drummed waste and these documents are included as Attachment D.

Summary and Recommendations

The NYSDEC site visit on December 22, 2005 was conducted in regards to the status of the Facility as a RCRA facility. The NYSDEC verbally requested sampling at that time and provided a PR & VSI Report, dated February 2006 that further indicated the sampling required for two AOCs identified in the report. As requested by NYSDEC, concrete core samples and sediment/grit samples were collected.

AOC #1: Sump Pump Area

Although some low-level PCBs were detected in two of the four concrete samples, the concentrations are below RSCOs referenced in TAGM 4046, and do not meet hazardous waste characterization criteria or indicative of a human health issue. In addition, the two concrete core samples collected from within the concrete pit in Tube 2 did not detect concentrations of PCBs above the reported laboratory detection limits.

AOC #2: Floor Drains in Tube 2

Although petroleum-related VOCs were detected in sediment samples, the detected compounds do not meet hazardous waste characterization criteria. In addition, the concentrations detected are relatively low levels and do not appear to represent a remedial concern for the Facility. Furthermore, LaBella understands' that AMP removed the sediments in Tube 2/Floor Drain 1. In addition, based on the prior comprehensive subsurface soil and groundwater investigation conducted at the Facility, NYSDEC inactivated spill file #0551029 and stated that no further action was necessary to address the petroleum impacts.

Based on the above, additional sampling in relation to RCRA issues does not appear warranted. Furthermore, it is recommended that this letter be submitted to the NYSDEC and be petitioned to remove the Facility from listings as an active RCRA generator and RCRA TSD facility.

We appreciate the opportunity to serve Boylan, Brown, Code, Vigdor and Wilson, LLP environmental engineering needs. If you have any questions regarding the work completed please do not hesitate to call me at (585) 295-6243 or Dan Noll at (585) 295-6611.

Respectfully submitted,

LABELLA ASSOCIATES, P.C.

D. P. N FOR

Gregory R. Senecal
Environmental Director

D. P. N

Daniel P. Noll, P.E.
Project Engineer

GRS/DPN/lk

Attachments

cc: Thomas Walsh, Esq., Hiscock & Barclay

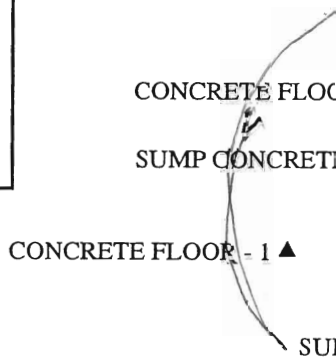
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LABELLA
LaBella Associates, P.C.
300 State Street
Rochester, New York 14614

Figure

MACHINE SHOP

TUBE /



FLOOR DRAIN - 1

FLOOR DRAIN - 2

TUBE / BLDG NO. 2

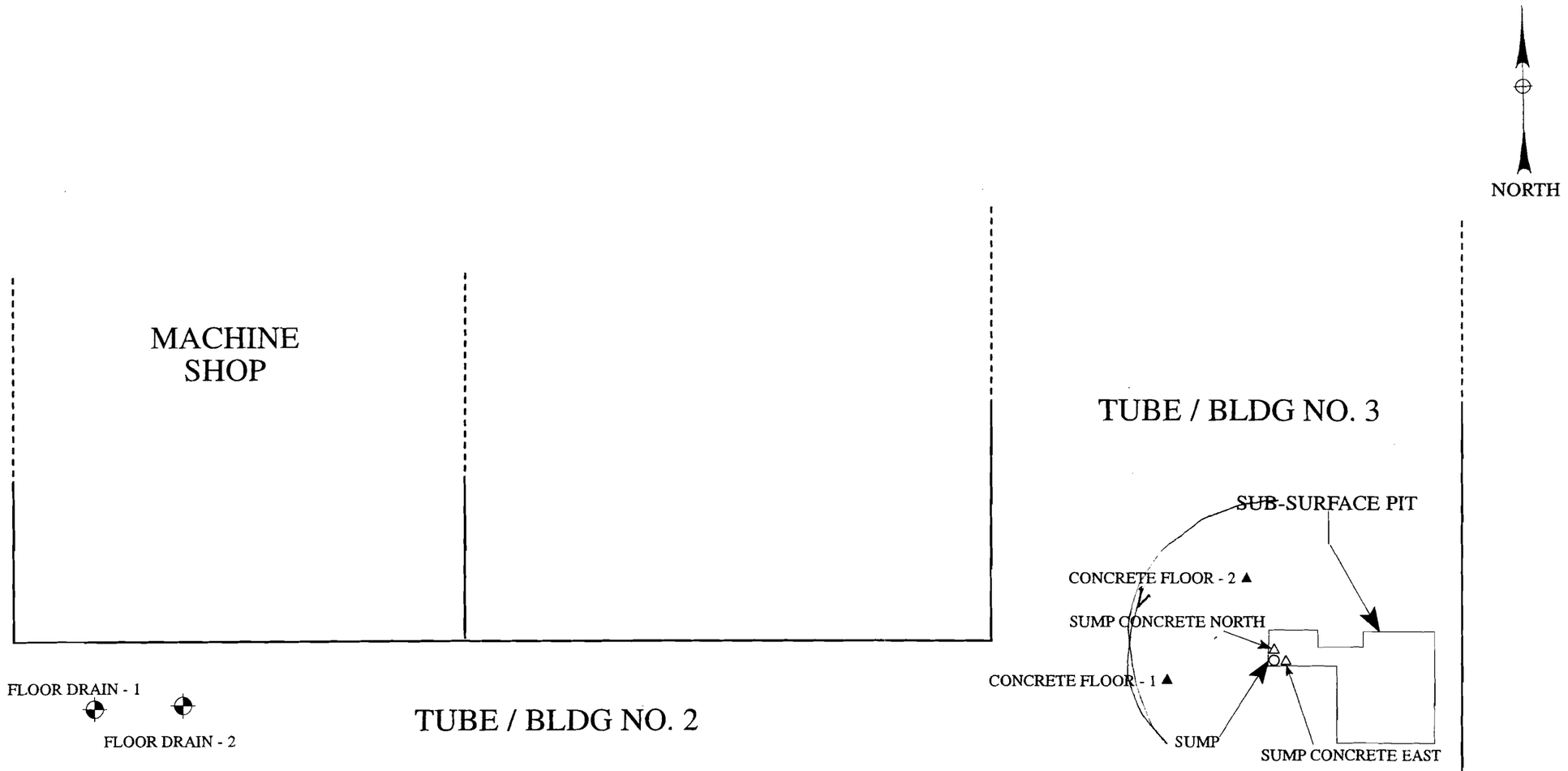
OFFICE

LEGEND:

- APPROXIMATE FLOOR DRAIN LOCATIONS WHERE SEDIMENT/GRIT SAMPLES WERE COLLECTED ON DECEMBER 30, 2005 AND MARCH 7, 2006
- ▲ APPROXIMATE LOCATION OF CONCRETE FLOOR SAMPLE COLLECTED ON DECEMBER 30, 2005

NOTES:

1. ALL LOCATIONS SHOWN ARE APPROXIMATE.



LEGEND:

- ⊕ APPROXIMATE FLOOR DRAIN LOCATIONS WHERE SEDIMENT/GRIT SAMPLES WERE COLLECTED ON DECEMBER 30, 2005 AND MARCH 7, 2006
- ▲ APPROXIMATE LOCATION OF CONCRETE FLOOR SAMPLE COLLECTED ON DECEMBER 30, 2005
- △ APPROXIMATE LOCATION OF SUPPLEMENTAL CONCRETE SAMPLE COLLECTED ON MARCH 7, 2006

NOTES:

1. ALL LOCATIONS SHOWN ARE APPROXIMATE.

SCALE: 1 INCH EQUALS APPROXIMATELY 50 FEET

LABELLA Associates, P.C.
300 STATE STREET
ROCHESTER, NY 14614
P: (585) 454-6110
F: (585) 454-3066

PROJECT/LOCATION

SUPPLEMENTAL PHASE II ENVIRONMENTAL STIE ASSESSMENT

FOSTER WHEELER SITE
9431 FOSTER WHEELER RD
DANSVILLE, NEW YORK

DRAWING TITLE

SITE MAP AND SAMPLING LOCATIONS

DESIGNED BY: MFP
DRAWN BY: MFP/CAS
REVIEWED BY: DPN

ISSUED FOR: FINAL

DATE: MARCH 2006

PROJECT/DRAWING NO.

[205239.01]

[FIGURE 1]

LABELLA
LaBella Associates, P.C.
300 State Street
Rochester, New York 14614

Attachment A

NYSDEC Spill #0551029
Inactivation Letter

New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 8
Bureau of Technical Support
6274 East Avon-Lima Road, Avon, New York 14414-9519
Phone: (585) 226-2466 • **FAX:** (585) 226-8139
Website: www.dec.state.ny.us

Denise M. Sheehan
Acting
Commissioner

November 23, 2005

Mr. Frank Pavia, Esquire.
Boylon, Brown, Code, Victor & Wilson, LLP.
2400 Chase Square
Rochester, NY 14604

Dear Mr. Pavia:

RE: Spill #0551029
9431 Foster Wheeler Road
Dansville, Livingston County, NY

The Department has reviewed the spill history and subsequent investigation and remedial efforts regarding the above site for the purpose of inactivation and removal from the Department's active spill files. Based on such review, the Department has determined that you have completed the necessary cleanup and removal actions, and no further remedial actions are necessary.

Nothing contained herein shall be construed as barring, diminishing, or in any way limiting the Department's authority under the Navigation Law or the Environmental Conservation Law, including the authority to require additional remedial work if necessary.

Should you have any questions concerning this matter, you may call me at (585) 226-5434. This Department has reviewed the referenced spill file. Based upon this review, we have no further requirements for this spill at this time.

Should additional environmental problems be discovered at this site, this office will require further action at that time. The spill has been removed from our active spill files.

Sincerely,

Peter R. Miller
Engineering Geologist 2
Spill Prevention & Response

cc: Bruce Finster

New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 8
Bureau of Technical Support
6274 East Avon-Lima Road, Avon, New York 14414-9519
Phone: (585) 226-2466 • **FAX:** (585) 226-8139
Website: www.dec.state.ny.us

Denise M. Sheehan
Acting
Commissioner

September 29, 2005

Frank C. Pavia, Esq.
Boylan, Brown, Code, Vigdor & Wilson, LLP
Attorneys at Law
2400 Chase Square
Rochester, New York 14604

RE: Dansville Properties, LLC
(Former Foster Wheeler Plant)
North Dansville (T), Livingston County
Spill No. 0551029

Dear Mr. Pavia:

This is to confirm the September 28, 2005 meeting in this office with the following present:

Larry Mehlenbacher - LMC Industrial Contractors, Inc.
Frank Pavia - Boylan, Brown, Code, Vigdor & Wilson, LLP
Thomas F Walsh - Hiscock & Barclay
Douglas Stout - Tetra Tech
Sean Hanna - NYSDEC Region 8 Regional Director
Peter Miller - NYSDEC Region 8 Spills
Bruce Finster - NYSDEC Region 8 Spills

The purpose of this meeting was to discuss the Phase II September 2005 Environmental Site Assessment prepared by LaBella Associates PC for this site. We have completed the review of that document and further delineation of the petroleum contamination is required in the area of TB-18 North of Building 18. It was agreed that further delineation will promptly occur. Mr. Peter Miller will meet on September 30, 2005 on site with representatives of LaBella Associates to agree on locations of any additional monitoring wells/borings.

Review of the rest of this referenced Site Assessment did not reveal any other areas of environmental concern.

After the contamination in the area of TB-18 is satisfactorily resolved, a no further action letter will be issued for Spill No. 0551029. As we discussed, RCRA issues still remain to be resolved with the NYSDEC Central Office Division of Solid and Hazardous Materials - Steve Malsan. The no further action letter ruling does not preclude reactivation of this case should new information become available, receptors are impacted by, and/or off-site migration of contamination is discovered in the future. The no further action letter does not preclude any action required by New York State Department of Health for any site determined health issues.

Please keep me informed of the progress in this matter. It was a pleasure meeting with you and the other meeting attendees. Thank you for your cooperation.

Very truly yours,

Bruce W. Finster, P.E.
Regional Spill Engineer
Division of Environmental Remediation

BWF:map

cc: S. Hanna
P. Miller
L. Mehlenbacher
T. Walsh
D. Stout

LABELLA
LaBella Associates, P.C.
300 State Street
Rochester, New York 14614

Attachment B

Laboratory Report

PARADIGM ENVIRONMENTAL SERVICES, INC. 179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

PCB Analysis Report for Non-potable Water

Client: LaBella Associates, P.C.

Client Job Site:	9341 Foster Wheeler Road Dansville, NY	**Lab Project Number:**	06-0113
		Lab Sample Number:	1023
Client Job Number:	N/A		
Field Location:	Tube 3 / Sump	**Date Sampled:**	12/30/2005
Field ID Number:	N/A	**Date Received:**	1/3/2006
Sample Type:	Water	**Date Analyzed:**	1/5/2006

PCB Identification	Results in ug / L
Aroclor 1016	ND< 1.00
Aroclor 1221	ND< 1.00
Aroclor 1232	ND< 1.00
Aroclor 1242	ND< 1.00
Aroclor 1248	ND< 1.00
Aroclor 1254	ND< 1.00
Aroclor 1260	ND< 1.00

ELAP Number 10958 Method: EPA 8082

Comments: ND denotes Non Detect
ug / L = microgram per Liter

ELECTRONIC REPORT FACSIMILE. THE ORIGINAL IS THE SIGNED COPY.

This report is part of a multipage document and should only be evaluated in its entirety. Chain of Custody provides additional information, including compliance with sample condition requirements upon receipt.

PARADIGM ENVIRONMENTAL SERVICES, INC. 179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

PCB Analysis Report for Soils/Solids/Sludges

Client: LaBella Associates, P.C.

Client Job Site:	9341 Foster Wheeler Road Dansville, NY	**Lab Project Number:**	06-0113
		Lab Sample Number:	1024
Client Job Number:	N/A		
Field Location:	Tube 3 / Concrete Floor-1	**Date Sampled:**	12/30/2005
Field ID Number:	N/A	**Date Received:**	1/3/2006
Sample Type:	Solid	**Date Analyzed:**	1/5/2006

PCB Identification	Results in mg / Kg
Aroclor 1016	ND< 0.305
Aroclor 1221	ND< 0.305
Aroclor 1232	ND< 0.305
Aroclor 1242	ND< 0.305
Aroclor 1248	0.716
Aroclor 1254	ND< 0.305
Aroclor 1260	ND< 0.305

ELAP Number 10958 Method: EPA 8082

Comments: ND denotes Non Detect
mg / Kg = milligram per Kilogram

ELECTRONIC REPORT FACSIMILE. THE ORIGINAL IS THE SIGNED COPY.

This report is part of a multipage document and should only be evaluated in its entirety. Chain of Custody provides additional information, including compliance with sample condition requirements upon receipt.

PARADIGM ENVIRONMENTAL SERVICES, INC. 179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

PCB Analysis Report for Soils/Solids/Sludges

Client: LaBella Associates, P.C.

Client Job Site:	9341 Foster Wheeler Road Dansville, NY	**Lab Project Number:**	06-0113
Client Job Number:	N/A	**Lab Sample Number:**	1025
Field Location:	Tube 3 / Concrete Floor-2	**Date Sampled:**	12/30/2005
Field ID Number:	N/A	**Date Received:**	1/3/2006
Sample Type:	Solid	**Date Analyzed:**	1/5/2006

PCB Identification	Results in mg / Kg
Aroclor 1016	ND< 0.303
Aroclor 1221	ND< 0.303
Aroclor 1232	ND< 0.303
Aroclor 1242	ND< 0.303
Aroclor 1248	0.740
Aroclor 1254	ND< 0.303
Aroclor 1260	ND< 0.303

ELAP Number 10958 Method: EPA 8082

Comments: ND denotes Non Detect
mg / Kg = milligram per Kilogram

ELECTRONIC REPORT FACSIMILE. THE ORIGINAL IS THE SIGNED COPY.

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PARADIGM
ENVIRONMENTAL SERVICES, INC. 179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

PCB Analysis Report for Soils/Solids/Sludges

Client: LaBella Associates, P.C.

Client Job Site:	9341 Foster Wheeler Rd., Dansville	**Lab Project Number:**	06-0748
		Lab Sample Number:	2800
Client Job Number:	205239.01		
Field Location:	Sump Conc. North	**Date Sampled:**	03/07/2006
Field ID Number:	N/A	**Date Received:**	03/08/2006
Sample Type:	Conc.	**Date Analyzed:**	03/09/2006

PCB Identification	Results in mg / Kg
Aroclor 1016	ND< 0.303
Aroclor 1221	ND< 0.303
Aroclor 1232	ND< 0.303
Aroclor 1242	ND< 0.303
Aroclor 1248	ND< 0.303
Aroclor 1254	ND< 0.303
Aroclor 1260	ND< 0.303

ELAP Number 10958 Method: EPA 8082

Comments: ND denotes Non Detect
mg / Kg = milligram per Kilogram

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PARADIGM
ENVIRONMENTAL SERVICES, INC. 179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

PCB Analysis Report for Soils/Solids/Sludges

Client: LaBella Associates, P.C.

Client Job Site:	9341 Foster Wheeler Rd., Dansville	**Lab Project Number:**	06-0748
		Lab Sample Number:	2801
Client Job Number:	205239.01		
Field Location:	Sump Conc. East	**Date Sampled:**	03/07/2006
Field ID Number:	N/A	**Date Received:**	03/08/2006
Sample Type:	Conc.	**Date Analyzed:**	03/09/2006

PCB Identification	Results in mg / Kg
Aroclor 1016	ND< 0.308
Aroclor 1221	ND< 0.308
Aroclor 1232	ND< 0.308
Aroclor 1242	ND< 0.308
Aroclor 1248	ND< 0.308
Aroclor 1254	ND< 0.308
Aroclor 1260	ND< 0.308

ELAP Number 10958 Method: EPA 8082

Comments: ND denotes Non Detect
mg / Kg = milligram per Kilogram

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PARADIGM ENVIRONMENTAL SERVICES, INC. 179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

Volatile Analysis Report for Soils/Solids/Sludges

Client: LaBella Associates, P.C.

Client Job Site:	9341 Foster Wheeler Road Dansville, NY	**Lab Project Number:**	06-0113
		Lab Sample Number:	1022
Client Job Number:	N/A		
Field Location:	Tube 2 / Floor Drain - 2	**Date Sampled:**	12/30/2005
Field ID Number:	N/A	**Date Received:**	1/3/2006
Sample Type:	Soil	**Date Analyzed:**	1/9/2006

Halocarbons	Results in ug / Kg
Bromodichloromethane	ND< 2.83
Bromomethane	ND< 2.83
Bromoform	ND< 2.83
Carbon Tetrachloride	ND< 2.83
Chloroethane	ND< 2.83
Chloromethane	ND< 2.83
2-Chloroethyl vinyl Ether	ND< 2.83
Chloroform	ND< 2.83
Dibromochloromethane	ND< 2.83
1,1-Dichloroethane	ND< 2.83
1,2-Dichloroethane	ND< 2.83
1,1-Dichloroethene	ND< 2.83
cis-1,2-Dichloroethene	ND< 2.83
trans-1,2-Dichloroethene	ND< 2.83
1,2-Dichloropropane	ND< 2.83
cis-1,3-Dichloropropene	ND< 2.83
trans-1,3-Dichloropropene	ND< 2.83
Methylene chloride	ND< 7.07
1,1,2,2-Tetrachloroethane	ND< 2.83
Tetrachloroethene	ND< 2.83
1,1,1-Trichloroethane	ND< 2.83
1,1,2-Trichloroethane	ND< 2.83
Trichloroethene	ND< 2.83
Trichlorofluoromethane	ND< 2.83
Vinyl chloride	ND< 2.83

Aromatics	Results in ug / Kg
Benzene	ND< 2.83
Chlorobenzene	ND< 2.83
Ethylbenzene	ND< 2.83
Toluene	ND< 2.83
m,p-Xylene	3.27
o-Xylene	ND< 2.83
Styrene	ND< 2.83
1,2-Dichlorobenzene	ND< 2.83
1,3-Dichlorobenzene	ND< 2.83
1,4-Dichlorobenzene	ND< 2.83

Ketones	Results in ug / Kg
Acetone	ND< 14.1
2-Butanone	ND< 7.07
2-Hexanone	ND< 7.07
4-Methyl-2-pentanone	ND< 7.07

Miscellaneous	Results in ug / Kg
Carbon disulfide	ND< 7.07
Vinyl acetate	ND< 7.07

ELAP Number 10958 Method: EPA 8260B Data File: V34012.D

Comments: ND denotes Non Detect
ug / Kg = microgram per Kilogram

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PARADIGM ENVIRONMENTAL SERVICES, INC. 179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

Volatile Analysis Report for Soils/Solids/Sludges (Additional STARS Compounds)

Client: LaBella Associates, P.C.

Client Job Site:	9341 Foster Wheeler Road Dansville, NY	**Lab Project Number:**	06-0113
		Lab Sample Number:	1022
Client Job Number:	N/A		
Field Location:	Tube 2 / Floor Drain - 2	**Date Sampled:**	12/30/2005
Field ID Number:	N/A	**Date Received:**	1/3/2006
Sample Type:	Soil	**Date Analyzed:**	1/9/2006

Aromatics	Results in ug / Kg	Aromatics	Results in ug / Kg
n-Butylbenzene	ND< 2.83	1,2,4-Trimethylbenzene	ND< 2.83
sec-Butylbenzene	ND< 2.83	1,3,5-Trimethylbenzene	ND< 2.83
tert-Butylbenzene	ND< 2.83		
n-Propylbenzene	ND< 2.83	**Miscellaneous**	
Isopropylbenzene	ND< 2.83	Methyl tert-butyl Ether	ND< 2.83
p-Isopropyltoluene	ND< 2.83		
Naphthalene	ND< 7.07		

ELAP Number 10958 Method: EPA 8260B Data File: V34012.D

Comments: ND denotes Non Detect
ug / Kg = microgram per Kilogram

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PARADIGM ENVIRONMENTAL SERVICES, INC. 179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

Volatile Analysis Report for Soils/Solids/Sludges

Client: LaBella Associates, P.C.

Client Job Site:	9341 Foster Wheeler Road Dansville, NY	**Lab Project Number:**	06-0113
		Lab Sample Number:	1021
Client Job Number:	N/A		
Field Location:	Tube 2 / Floor Drain - 1	**Date Sampled:**	12/30/2005
Field ID Number:	N/A	**Date Received:**	1/3/2006
Sample Type:	Soil	**Date Analyzed:**	1/9/2006

Halocarbons	Results in ug / Kg
Bromodichloromethane	ND< 53.8
Bromomethane	ND< 53.8
Bromoform	ND< 53.8
Carbon Tetrachloride	ND< 53.8
Chloroethane	ND< 53.8
Chloromethane	ND< 53.8
2-Chloroethyl vinyl Ether	ND< 53.8
Chloroform	ND< 53.8
Dibromochloromethane	ND< 53.8
1,1-Dichloroethane	ND< 53.8
1,2-Dichloroethane	ND< 53.8
1,1-Dichloroethene	ND< 53.8
cis-1,2-Dichloroethene	ND< 53.8
trans-1,2-Dichloroethene	ND< 53.8
1,2-Dichloropropane	ND< 53.8
cis-1,3-Dichloropropene	ND< 53.8
trans-1,3-Dichloropropene	ND< 53.8
Methylene chloride	ND< 134
1,1,2,2-Tetrachloroethane	ND< 53.8
Tetrachloroethene	ND< 53.8
1,1,1-Trichloroethane	ND< 53.8
1,1,2-Trichloroethane	ND< 53.8
Trichloroethene	ND< 53.8
Trichlorofluoromethane	ND< 53.8
Vinyl chloride	ND< 53.8

Aromatics	Results in ug / Kg
Benzene	ND< 53.8
Chlorobenzene	ND< 53.8
Ethylbenzene	458
Toluene	92.2
m,p-Xylene	2,050
o-Xylene	1,290
Styrene	ND< 53.8
1,2-Dichlorobenzene	ND< 53.8
1,3-Dichlorobenzene	ND< 53.8
1,4-Dichlorobenzene	ND< 53.8

Ketones	Results in ug / Kg
Acetone	1,560
2-Butanone	519
2-Hexanone	ND< 134
4-Methyl-2-pentanone	ND< 134

Miscellaneous	Results in ug / Kg
Carbon disulfide	ND< 134
Vinyl acetate	ND< 134

ELAP Number 10958 Method: EPA 8260B Data File: V34011.D

Comments: ND denotes Non Detect
ug / Kg = microgram per Kilogram

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PARADIGM ENVIRONMENTAL SERVICES, INC. 179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

Volatile Analysis Report for Soils/Solids/Sludges (Additional STARS Compounds)

Client: LaBella Associates, P.C.

Client Job Site:	9341 Foster Wheeler Road Dansville, NY	**Lab Project Number:**	06-0113
		Lab Sample Number:	1021
Client Job Number:	N/A		
Field Location:	Tube 2 / Floor Drain - 1	**Date Sampled:**	12/30/2005
Field ID Number:	N/A	**Date Received:**	1/3/2006
Sample Type:	Soil	**Date Analyzed:**	1/9/2006

Aromatics	Results in ug / Kg	Aromatics	Results in ug / Kg
n-Butylbenzene	1,220	1,2,4-Trimethylbenzene	E 9,930
sec-Butylbenzene	472	1,3,5-Trimethylbenzene	2,500
tert-Butylbenzene	ND< 53.8		
n-Propylbenzene	857	**Miscellaneous**	
Isopropylbenzene	324	Methyl tert-butyl Ether	ND< 53.8
p-Isopropyltoluene	625		
Naphthalene	2,640		

ELAP Number 10958 Method: EPA 8260B Data File: V34011.D

Comments: ND denotes Non Detect
ug / Kg = microgram per Kilogram
E denotes Estimated. Concentration exceeds calibration range.

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PARADIGM
ENVIRONMENTAL SERVICES, INC. 179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

PCB Analysis Report for Soils/Solids/Sludges

Client: LaBella Associates, P.C.

Client Job Site:	9341 Foster Wheeler Rd., Dansville	**Lab Project Number:**	06-0748
		Lab Sample Number:	2798
Client Job Number:	205239.01		
Field Location:	FD#1 Sediment	**Date Sampled:**	03/07/2006
Field ID Number:	N/A	**Date Received:**	03/08/2006
Sample Type:	Sediment	**Date Analyzed:**	03/09/2006

PCB Identification	Results in mg / Kg
Aroclor 1016	ND< 0.312
Aroclor 1221	ND< 0.312
Aroclor 1232	ND< 0.312
Aroclor 1242	ND< 0.312
Aroclor 1248	ND< 0.312
Aroclor 1254	ND< 0.312
Aroclor 1260	ND< 0.312

ELAP Number 10958 Method: EPA 8082

Comments: ND denotes Non Detect
mg / Kg = milligram per Kilogram

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PARADIGM
ENVIRONMENTAL SERVICES, INC. 179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

PCB Analysis Report for Soils/Solids/Sludges

Client: LaBella Associates, P.C.

Client Job Site:	9341 Foster Wheeler Rd., Dansville	**Lab Project Number:**	06-0748
		Lab Sample Number:	2799
Client Job Number:	205239.01		
Field Location:	FD#2 Sediment	**Date Sampled:**	03/07/2006
Field ID Number:	N/A	**Date Received:**	03/08/2006
Sample Type:	Sediment	**Date Analyzed:**	03/09/2006

PCB Identification	Results in mg / Kg
Aroclor 1016	ND< 0.306
Aroclor 1221	ND< 0.306
Aroclor 1232	ND< 0.306
Aroclor 1242	ND< 0.306
Aroclor 1248	ND< 0.306
Aroclor 1254	ND< 0.306
Aroclor 1260	ND< 0.306

ELAP Number 10958 Method: EPA 8082

Comments: ND denotes Non Detect
mg / Kg = milligram per Kilogram

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LABELLA
LaBella Associates, P.C.
300 State Street
Rochester, New York 14614

Attachment C

Historic Waste Stream Profile Sheets

Clean Harbors ENVIRONMENTAL SERVICES, INC.

WASTE MATERIAL PROFILE SHEET

Clean Harbors Profile No. CH1906

A. GENERAL INFORMATION

GENERATOR EPA-ID: NYD002205599
GENERATOR PROFILE No. **CH1906**
GENERATOR CODE (Assigned by Clean Harbors) *FOS001*
GENERATOR NAME: *Foster Wheeler Corporation*
ADDRESS *9431 Foster Wheeler Road*
CITY *Dansville* STATE *NY* ZIP/POSTAL CODE *14437*
PHONE:

CUSTOMER CODE (Assigned by Clean Harbors) *FOS001*
CUSTOMER NAME: *Foster Wheeler Corporation*
ADDRESS *9431 Foster Wheeler Road*
CITY *Dansville* STATE/PROVINCE *NY* ZIP/POSTAL CODE *14437*

B. WASTE DESCRIPTION

WASTE DESCRIPTION: *WASTE COOLANT & OIL*
PROCESS GENERATING WASTE (Please provide detailed description of process generating waste):
CHANGING OF MACHINE COOLANTS

C. PHYSICAL PROPERTIES (at 25C or 77F)

PHYSICAL STATE
- SOLID WITHOUT FREE LIQUID
- POWDER
- MONOLITHIC SOLID
- ☑ LIQUID WITH NO SOLIDS
- LIQUID/SOLID MIXTURE
  - % FREE LIQUID
  - % SETTLED SOLID
  - % TOTAL SUSPENDED SOLID
- SLUDGE
- GAS/AEROSOL

NUMBER OF PHASES/LAYERS
☑ 1 2 3
% BY VOLUME (Approx.)
TOP
MIDDLE
BOTTOM *90.00*

VISCOSITY (If liquid present)
☑ 1 - 100 (e.g. WATER)
101 - 500 (e.g. MOTOR OIL)
501 - 10,000 (e.g. MOLASSES)
> 10,000

COLOR
MILKY WHITE

ODOR
☑ NONE
MILD
STRONG
Describe:

BOILING POINT °F (°C)
<= 95 (<=35)
95 - 100 (35-38)
101 - 129 (38-54)
☑ >= 130 (>54)

MELTING POINT °F (°C)
< 140 (<60)
140-200 (60-93)
> 200 (>93)

TOTAL ORGANIC CARBON
<= 1%
1-9%
☑ >= 10%

FLASH POINT °F (°C)
< 73 (<23)
73 - 100 (23-38)
101 -140 (38-60)
141 -200 (60-93)
☑ > 200 (>93)
Actual:

pH
<= 2
2.1 - 6.9
☑ 7 (Neutral)
7.1 - 12.4
>= 12.5
Actual:

SPECIFIC GRAVITY
< 0.8 (e.g. Gasoline)
0.8-1.0 (e.g. Ethanol)
☑ 1.0 (e.g. Water)
1.0-1.2 (e.g. Antifreeze
> 1.2 (e.g. Methylene Chloride)

ASH
< 0.1
0.1 - 1.0
1.1 - 5.0
5.1 - 20.0
> 20
☑ Unknown
Actual:

BTU/LB (MJ/kg)
☑ < 2,000 (<4.6)
2,000-5,000 (4.6-11.6)
5,000-10,000 (11.6-23.2)
> 10,000 (>23.2)
Actual:

VAPOR PRESSURE (for liquids only) mm Hg

D. COMPOSITION (List the complete composition of the waste, include any inert components and /or debris. Ranges for individual components are acceptable. If a trade name is used, please supply an MSDS. Please do not use abbreviations.)

CHEMICAL	MIN – MAX	UOM
OIL		Trace
WATER	*85.000 – 95.000*	%
WATER SOLUBLE COOLANT	*5.000 – 15.000*	%

CHEMICAL	MIN – MAX	UOM

ANY METAL OBJECTs PRESENT? YES ☑ NO
If yes include dimension:

Clean Harbors Profile No. CH1906

E. CONSTITUENTS – Are these values based on testing or knowledge? ☑ Knowledge ☐ Testing

If constituent concentrations are base on analytical testing, analysis must be provided. If based on knowledge, basis of knowledge must be provided below.

RCRA	REGULATED METALS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL ppm
D004	ARSENIC	5.0		
D005	BARIUM	100.0		
D006	CADMIUM	1.0		
D007	CHROMIUM	5.0		
D008	LEAD	5.0		
D009	MERCURY	0.2		
D010	SELENIUM	1.0		
D011	SILVER	5.0		

RCRA	VOLATILE COMPOUNDS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL ppm
D018	BENZENE	0.5		
D019	CARBON TETRACHLORIDE	0.5		
D021	CHLOROBENZENE	100.0		
D022	CHLOROFORM	6.0		
D028	1,2-DICHLOROETHANE	0.5		
D029	1,1-DICHLOROETHYLENE	0.7		
D035	METHYL ETHYL KETONE	200.0		
D039	TETRACHLOROETHYLENE	0.7		
D040	TRICHLOROETHYLENE	0.5		
D043	VINYL CHLORIDE	0.2		

RCRA	SEMI-VOLATILE COMPOUND	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL ppm
D023	o-CRESOL	200.0		
D024	m-CRESOL	200.0		
D025	p-CRESOL	200.0		
D026	CRESOL (TOTAL)	200.0		
D027	1,4-DICHLOROBENZENE	7.5		
D030	2,4-DINITROTOLUENE	0.13		
D032	HEXACHLOROBENZENE	0.13		
D033	HEXACHLOROBUTADIENE	0.5		
D034	HEXACHLOROETHANE	3.0		
D036	NITROBENZENE	2.0		
D037	PENTACHLOROPHENOL	100.0		
D038	PYRIDINE	5.0		
D041	2,4,5-TRICHLOROPHENOL	400.0		
D042	2,4,6-TRICHLOROPHENOL	2.0		

RCRA	PESTICIDES AND HERBICIDE	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL ppm
D012	ENDRIN	0.02		
D013	LINDANE	0.4		
D014	METHOXYCHLOR	10.0		
D015	TOXAPHENE	0.5		
D016	2,4-D	10.0		
D017	2,4,5-TP (SILVEX)	1.0		
D020	CHLORDANE	0.03		
D031	HEPTACHLOR (AND ITS EPOXIDE)	0.008		

OTHER METALS	MIN	MAX	UOM
ALUMINUM			
ANTIMONY			
BERYLLIUM			
CALCIUM			
COPPER			
MAGNESIUM			
MOLYBDENUM			
NICKEL			
POTASSIUM			
SILICON			
SODIUM			
THALLIUM			
TIN			
VANADIUM			
ZINC			

NON-METALS	MIN	MAX	UOM
BROMINE			
CHLORINE			
FLUORINE			
IODINE			
SULFUR			

OTHER NON-METALS	MIN	MAX	UOM
AMMONIA			
REACTIVE SULFIDE			
CYANIDE-TOTAL			
CYANIDE AMENABLE			
CYANIDE REACTIVE			

OTHER CHEMICALS	MIN	MAX	UOM
PHENOL			
Total Petroleum Hydrocarbons			

OTHER

HOCs
☑ NONE
< 1000 PPM
>= 1000 PPM

PCBs
☑ NONE
<50 PPM
>= 50 PPM

IF PCBS ARE PRESENT, IS THE WASTE REGULATED BY TSCA 40 CFR 761?

YES ☑ NO

ADDITIONAL HAZARD

DOES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED?

YES ☑ NO (If yes, explain)

ASBESTOS
DEA REGULATED SUBSTANCES
DIOXIN
EXPLOSIVE
HERBICIDE
FUMING / SMOKING WASTE
INFECTIOUS, PATHOGENIC, OR ETIOLOGICAL AGENT
OXIDIZER
OSHA REGULATED CARCINOGENS
PESTICIDE
POLYMERIZABLE
RADIOACTIVE
REDUCING AGENT
SHOCK SENSITIVE
SPONTANEOUSLY IGNITES WITH AIR
THERMALLY SENSITIVE
WATER REACTIVE

NONE OF THE ABOVE

Clean Harbors Profile No. CH1906

F. REGULATORY STATUS

YES ☑ NO USEPA HAZARDOUS WASTE?

☑ YES NO DO ANY STATE WASTE CODES APPLY?
CR02 MA01

YES ☑ NO IS THIS WASTE PROHIBITED FROM LAND DISPOSAL WITHOUT FURTHER TREATMENT PER 40 CFR PART 268?
LDR CATEGORY:
VARIANCE INFO:

YES NO IS THIS A UNIVERSAL WASTE?

YES ☑ NO IS THIS A WASTEWATER PER 40 CFR PART 268.2?

YES ☑ NO IF ANY WASTE CODES D001, D002, D003 (OTHER THAN REACTIVE CYANIDE OR REACTIVE SULFIDE), D004-D0011, D012-DO17 NON-WASTEWATERS, OR D018- D043 APPLY, ARE ANY UNDERLYING HAZARDOUS (UHCs) PRESENT ABOVE UNIVERSAL TREATMENT STANDARDS (UTS)?

YES ☑ NO DOES TREATMENT OF THIS WASTE GENERATE A F006 OR F019 SLUDGE?

YES ☑ NO IS THIS WASTE SUBJECT TO CATEGORICAL PRETREATMENT DISCHARGE STANDARDS?

IF YES, SPECIFY POINT SOURCE CATEGORY LISTED IN 40 CFR PART 401. *000*

YES ☑ NO IS THIS WASTE REGULATED UNDER THE BENZENE NESHAP RULES? (IS THIS WASTE FROM A CHEMICAL MANUFACTURING, COKE BY-PRODUCT RECOVERY, OR PETROLEUM REFINERY PROCESS?)

YES ☑ NO DOES THIS WASTE CONTAIN VOC'S IN CONCENTRATIONS >=500 PPM?

YES ☑ NO DOES THE WASTE CONTAIN GREATER THAN 20% OF ORGANIC CONSTITUENTS WITH A VAPOR PRESSURE >= .3KPA (.044 PSIA)?

YES ☑ NO DOES THIS WASTE CONTAIN AN ORGANIC CONSTITUENT WHICH IN ITS PURE FORM HAS A VAPOR PRESSURE GREATER THAN 77 KPa (11.2PSIA)?

YES ☑ NO IS THIS CERCLA REGULATED (SUPERFUND) WASTE ?

YES NO IS THIS WASTE REGULATED UNDER THE OZONE DEPLETING SUBSTANCE ACT FOR ONTARIO?

G. D.O.T INFORMATION: (Include proper shipping name, hazard class and ID number).
US D.O.T. DESCRIPTION: *NON DOT REGULATED MATERIAL, (WATER SOLUBLE COOLANT) , NONE, NONE*

H. TRANSPORTATION REQUIREMENTS
ESTIMATED SHIPMENT FREQUENCY: ONE TIME WEEKLY MONTHLY ☑ QUARTERLY YEARLY OTHER *Other*

IF BULK LIQUID OR BULK SOLID PLEASE INICATE THE EXPECTED NUMBER OF LOADS PER SHIPPING FREQUENCY:

☑ CONTAINERIZED
CONTAINERS/SHIPMENT
STORAGE CAPACITY:
CONTAINER TYPE:
CUBIC YARD BOX
PALLET
TOTE TANK
OTHER:
DRUM SIZE:
CONTAINER MATERIAL:
STEEL
FIBER
PLASTIC
OTHER

☑ BULK LIQUID
GALLONS/SHIPMENT: *4,500Min -5,500 Max* GAL.
☑ FROM TANKS: TANK SIZE *0* GAL.
FROM DRUMS
VEHICLE TYPE:
☑ VAC TRUCK
TANK TRUCK
RAILROAD TANK CAR
CHECK COMPATIBLE STORAGE MATERIALS.
STEEL ☑ STAINLESS STEEL
RUBBER LINED FIBERGLASS LINED
DERAKANE
OTHER

BULK SOLID
SHIPMENT UOM: TON YARD
PER SHIPMENT: 0.00 MIN 0.00 MAX
STORAGE CAPACITY TON/YD
VEHICLE TYPE:
DUMP TRAILER
ROLL OFF BOX
INTERMODAL ROLLOFF BOX
CUSCO/VACTOR
OTHER

I. SPECIAL REQUEST
SPECIFIC DISPOSAL RESTRICTIONS OR REQUESTS:
SPECIAL WASTE HANDLING REQUIREMENTS:
OTHER COMMENTS OR REQUESTS:

J. BIENNIAL / ANNUAL REPORTING INFORMATION
SIC CODE *3499* SOURCE CODE *G09* FORM CODE *W205*

K. SAMPLE STATUS	YES	SAMPLED BY	DATE SAMPLED	WHERE SENT
REPRESENTATIVE SAMPLE HAS BEEN SUPPLIED.	☑ NO			

GENERATORS CERTIFICATION

I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I aslo certify that any samples submitted are representative of the actual waste. If Clean Harbors discovers a discrepancy during the approval process, Generator grants Clean Harbors the authority to amend the profile, as Clean Harbors deems necessary, to reflect the discrepancy.

AUTHORIZED SIGNATURE NAME (PRINT) TITLE DATE

Clean Harbors ENVIRONMENTAL SERVICES, INC.

WASTE MATERIAL PROFILE SHEET

Clean Harbors Profile No. CH120728

A. GENERAL INFORMATION

GENERATOR EPA-ID: NYD002205599 GENERATOR PROFILE No. **CH120728**

GENERATOR CODE (Assigned by Clean Harbors) *FOS001* GENERATOR NAME: *Foster Wheeler Corporation*

ADDRESS *9431 Foster Wheeler Road* CITY *Dansville* STATE *NY* ZIP/POSTAL CODE *14437*

PHONE:

CUSTOMER CODE (Assigned by Clean Harbors) *FOS001* CUSTOMER NAME: *Foster Wheeler Corporation*

ADDRESS *9431 Foster Wheeler Road* CITY *Dansville* STATE/PROVINCE *NY* ZIP/POSTAL CODE *14437*

B. WASTE DESCRIPTION

WASTE DESCRIPTION: *Waste Oil*

PROCESS GENERATING WASTE (Please provide detailed description of process generating waste):

Changing od Oil on Equipment

C. PHYSICAL PROPERTIES (at 25C or 77F)

PHYSICAL STATE
- SOLID WITHOUT FREE LIQUID
- POWDER
- MONOLITHIC SOLID
- ☑ LIQUID WITH NO SOLIDS
- LIQUID/SOLID MIXTURE
  - % FREE LIQUID
  - % SETTLED SOLID
  - % TOTAL SUSPENDED SOLID
- SLUDGE
- GAS/AEROSOL

NUMBER OF PHASES/LAYERS: 1 ☑ 2 3

% BY VOLUME (Approx.): TOP *90.00* MIDDLE BOTTOM *10.00*

VISCOSITY (If liquid present)
- ☑ 1 - 100 (e.g. WATER)
- 101 - 500 (e.g. MOTOR OIL)
- 501 - 10,000 (e.g. MOLASSES)
- > 10,000

COLOR: *Black*

ODOR
- NONE
- ☑ MILD
- STRONG

Describe:

BOILING POINT °F (°C)
- <= 95 (<=35)
- 95 - 100 (35-38)
- 101 - 129 (38-54)
- ☑ >= 130 (>54)

MELTING POINT °F (°C)
- < 140 (<60)
- 140-200 (60-93)
- > 200 (>93)

TOTAL ORGANIC CARBON
- <= 1%
- 1-9%
- ☑ >= 10%

FLASH POINT °F (°C)
- < 73 (<23)
- 73 - 100 (23-38)
- 101 -140 (38-60)
- 141 -200 (60-93)
- ☑ > 200 (>93)

Actual:

pH
- <= 2
- 2.1 - 5.9
- ☑ 7 (Neutral)
- 7.1 - 12.4
- >= 12.5

Actual:

SPECIFIC GRAVITY
- < 0.8 (e.g. Gasoline)
- ☑ 0.8-1.0 (e.g. Ethanol)
- 1.0 (e.g. Water)
- 1.0-1.2 (e.g. Antifreeze
- > 1.2 (e.g. Methylene Chloride)

ASH
- < 0.1
- 0.1 - 1.0
- 1.1 - 5.0
- 5.1 - 20.0
- > 20
- ☑ Unknown

Actual:

BTU/LB (MJ/kg)
- < 2,000 (<4.6)
- 2,000-5,000 (4.6-11.6)
- 5,000-10,000 (11.6-23.2)
- ☑ > 10,000 (>23.2)

Actual:

VAPOR PRESSURE (for liquids only) mm Hg

D. COMPOSITION (List the complete composition of the waste, include any inert components and /or debris. Ranges for individual components are acceptable. If a trade name is used, please supply an MSDS. Please do not use abbreviations.)

CHEMICAL	MIN – MAX	UOM
OIL	*90.000 – 100.000*	%
WATER	*0.000 – 10.000*	%

CHEMICAL	MIN – MAX	UOM

ANY METAL OBJECTs PRESENT? YES ☑ NO

If yes include dimension:

Clean Harbors Profile No. CH120728

E. CONSTITUENTS – Are these values based on testing or knowledge? ☑ Knowledge ☐ Testing

If constituent concentrations are base on analytical testing, analysis must be provided. If based on knowledge, basis of knowledge must be provided below.

RCRA	REGULATED METALS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL ppm
D004	ARSENIC	5.0		
D005	BARIUM	100.0		
D006	CADMIUM	1.0		
D007	CHROMIUM	5.0		
D008	LEAD	5.0		
D009	MERCURY	0.2		
D010	SELENIUM	1.0		
D011	SILVER	5.0		

RCRA	VOLATILE COMPOUNDS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL ppm
D018	BENZENE	0.5		
D019	CARBON TETRACHLORIDE	0.5		
D021	CHLOROBENZENE	100.0		
D022	CHLOROFORM	6.0		
D028	1,2-DICHLOROETHANE	0.5		
D029	1,1-DICHLOROETHYLENE	0.7		
D035	METHYL ETHYL KETONE	200.0		
D039	TETRACHLOROETHYLENE	0.7		
D040	TRICHLOROETHYLENE	0.5		
D043	VINYL CHLORIDE	0.2		

RCRA	SEMI-VOLATILE COMPOUND	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL ppm
D023	o-CRESOL	200.0		
D024	m-CRESOL	200.0		
D025	p-CRESOL	200.0		
D026	CRESOL (TOTAL)	200.0		
D027	1,4-DICHLOROBENZENE	7.5		
D030	2,4-DINITROTOLUENE	0.13		
D032	HEXACHLOROBENZENE	0.13		
D033	HEXACHLOROBUTADIENE	0.5		
D034	HEXACHLOROETHANE	3.0		
D036	NITROBENZENE	2.0		
D037	PENTACHLOROPHENOL	100.0		
D038	PYRIDINE	5.0		
D041	2,4,5-TRICHLOROPHENOL	400.0		
D042	2,4,6-TRICHLOROPHENOL	2.0		

RCRA	PESTICIDES AND HERBICIDE	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL ppm
D012	ENDRIN	0.02		
D013	LINDANE	0.4		
D014	METHOXYCHLOR	10.0		
D015	TOXAPHENE	0.5		
D016	2,4-D	10.0		
D017	2,4,5-TP (SILVEX)	1.0		
D020	CHLORDANE	0.03		
D031	HEPTACHLOR (AND ITS EPOXIDE)	0.008		

OTHER METALS	MIN	MAX	UOM
ALUMINUM			
ANTIMONY			
BERYLLIUM			
CALCIUM			
COPPER			
MAGNESIUM			
MOLYBDENUM			
NICKEL			
POTASSIUM			
SILICON			
SODIUM			
THALLIUM			
TIN			
VANADIUM			
ZINC			

NON-METALS	MIN	MAX	UOM
BROMINE			
CHLORINE			
FLUORINE			
IODINE			
SULFUR			

OTHER NON-METALS	MIN	MAX	UOM
AMMONIA			
REACTIVE SULFIDE			
CYANIDE-TOTAL			
CYANIDE AMENABLE			
CYANIDE REACTIVE			

OTHER CHEMICALS	MIN	MAX	UOM
PHENOL			
Total Petroleum Hydrocarbons			

OTHER

HOCs
- ☑ NONE
- < 1000 PPM
- >= 1000 PPM

PCBs
- ☑ NONE
- <50 PPM
- >= 50 PPM

IF PCBS ARE PRESENT, IS THE WASTE REGULATED BY TSCA 40 CFR 761?

YES ☑ NO

ADDITIONAL HAZARD

DOES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED?

YES ☑ NO (If yes, explain)

ASBESTOS	INFECTIOUS, PATHOGENIC, OR ETIOLOGICAL AGENT	REDUCING AGENT
DEA REGULATED SUBSTANCES	OXIDIZER	SHOCK SENSITIVE
DIOXIN	OSHA REGULATED CARCINOGENS	SPONTANEOUSLY IGNITES WITH AIR
EXPLOSIVE	PESTICIDE	THERMALLY SENSITIVE
HERBICIDE	POLYMERIZABLE	WATER REACTIVE
FUMING / SMOKING WASTE	RADIOACTIVE	

☑ NONE OF THE ABOVE

Clean Harbors Profile No. CH120728

F. REGULATORY STATUS

YES ☑ NO USEPA HAZARDOUS WASTE?

☑ YES NO DO ANY STATE WASTE CODES APPLY?
CR02 MA01

YES ☑ NO IS THIS WASTE PROHIBITED FROM LAND DISPOSAL WITHOUT FURTHER TREATMENT PER 40 CFR PART 268?
LDR CATEGORY:
VARIANCE INFO:

YES NO IS THIS A UNIVERSAL WASTE?

YES ☑ NO IS THIS A WASTEWATER PER 40 CFR PART 268.2?

YES ☑ NO IF ANY WASTE CODES D001, D002, D003 (OTHER THAN REACTIVE CYANIDE OR REACTIVE SULFIDE), D004-D0011, D012-DO17 NON-WASTEWATERS, OR D018- D043 APPLY, ARE ANY UNDERLYING HAZARDOUS (UHCs) PRESENT ABOVE UNIVERSAL TREATMENT STANDARDS (UTS)?

YES ☑ NO DOES TREATMENT OF THIS WASTE GENERATE A F006 OR F019 SLUDGE?

YES ☑ NO IS THIS WASTE SUBJECT TO CATEGORICAL PRETREATMENT DISCHARGE STANDARDS?
IF YES, SPECIFY POINT SOURCE CATEGORY LISTED IN 40 CFR PART 401.

YES ☑ NO IS THIS WASTE REGULATED UNDER THE BENZENE NESHAP RULES? (IS THIS WASTE FROM A CHEMICAL MANUFACTURING, COKE BY-PRODUCT RECOVERY, OR PETROLEUM REFINERY PROCESS?)

YES ☑ NO DOES THIS WASTE CONTAIN VOC'S IN CONCENTRATIONS >=500 PPM?

YES ☑ NO DOES THE WASTE CONTAIN GREATER THAN 20% OF ORGANIC CONSTITUENTS WITH A VAPOR PRESSURE >= .3KPA (.044 PSIA)?

YES ☑ NO DOES THIS WASTE CONTAIN AN ORGANIC CONSTITUENT WHICH IN ITS PURE FORM HAS A VAPOR PRESSURE GREATER THAN 77 KPa (11.2PSIA)?

YES ☑ NO IS THIS CERCLA REGULATED (SUPERFUND) WASTE ?

YES NO IS THIS WASTE REGULATED UNDER THE OZONE DEPLETING SUBSTANCE ACT FOR ONTARIO?

G. D.O.T INFORMATION: (Include proper shipping name, hazard class and ID number).
US D.O.T. DESCRIPTION: *NON DOT REGULATED MATERIAL (OIL)*

H. TRANSPORTATION REQUIREMENTS
ESTIMATED SHIPMENT FREQUENCY: ONE TIME WEEKLY MONTHLY ☑ QUARTERLY YEARLY OTHER *Other*

IF BULK LIQUID OR BULK SOLID PLEASE INICATE THE EXPECTED NUMBER OF LOADS PER SHIPPING FREQUENCY:

☑ CONTAINERIZED
10-20 CONTAINERS/SHIPMENT
STORAGE CAPACITY: *0*
CONTAINER TYPE:
CUBIC YARD BOX
PALLET
TOTE TANK
OTHER:
☑ DRUM SIZE: *55*
CONTAINER MATERIAL:
☑ STEEL
FIBER
PLASTIC
OTHER

BULK LIQUID
GALLONS/SHIPMENT: GAL.
FROM TANKS: TANK SIZE GAL.
FROM DRUMS
VEHICLE TYPE:
VAC TRUCK
TANK TRUCK
RAILROAD TANK CAR
CHECK COMPATIBLE STORAGE MATERIALS.
STEEL | STAINLESS STEEL
RUBBER LINED | FIBERGLASS LINED
DERAKANE
OTHER

BULK SOLID
SHIPMENT UOM: TON YARD
PER SHIPMENT: 0.00 MIN 0.00 MAX
STORAGE CAPACITY TON/YD
VEHICLE TYPE:
DUMP TRAILER
ROLL OFF BOX
INTERMODAL ROLLOFF BOX
CUSCO/VACTOR
OTHER

I. SPECIAL REQUEST
SPECIFIC DISPOSAL RESTRICTIONS OR REQUESTS:
SPECIAL WASTE HANDLING REQUIREMENTS:
OTHER COMMENTS OR REQUESTS:

J. BIENNIAL / ANNUAL REPORTING INFORMATION
SIC CODE *3499* SOURCE CODE *G11* FORM CODE *W206*

K. SAMPLE STATUS

	YES	SAMPLED BY	DATE SAMPLED	WHERE SENT
REPRESENTATIVE SAMPLE HAS BEEN SUPPLIED.	☑ NO			

GENERATORS CERTIFICATION

I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I aslo certify that any samples submitted are representative of the actual waste. If Clean Harbors discovers a discrepancy during the approval process, Generator grants Clean Harbors the authority to amend the profile, as Clean Harbors deems necessary, to reflect the discrepancy.

AUTHORIZED SIGNATURE	NAME (PRINT)	TITLE	DATE

Clean Harbors
ENVIRONMENTAL SERVICES, INC.

WASTE MATERIAL PROFILE SHEET

Clean Harbors Profile No. CH56025

A. GENERAL INFORMATION

GENERATOR EPA-ID: NYD002205599
GENERATOR PROFILE No. **CH56025**
GENERATOR CODE (Assigned by Clean Harbors) *FOS001*
GENERATOR NAME: *Foster Wheeler Corporation*
ADDRESS *9431 Foster Wheeler Road*
CITY *Dansville* STATE *NY* ZIP/POSTAL CODE *14437*
PHONE:

CUSTOMER CODE (Assigned by Clean Harbors) *FOS001*
CUSTOMER NAME: *Foster Wheeler Corporation*
ADDRESS *9431 Foster Wheeler Road*
CITY *Dansville* STATE/PROVINCE *NY* ZIP/POSTAL CODE *14437*

B. WASTE DESCRIPTION

WASTE DESCRIPTION: *Oil & Water*
PROCESS GENERATING WASTE (Please provide detailed description of process generating waste):
Plant Closure

C. PHYSICAL PROPERTIES (at 25C or 77F)

PHYSICAL STATE
- SOLID WITHOUT FREE LIQUID
- POWDER
- MONOLITHIC SOLID
- ☑ LIQUID WITH NO SOLIDS
- LIQUID/SOLID MIXTURE
  - % FREE LIQUID
  - % SETTLED SOLID
  - % TOTAL SUSPENDED SOLID
- SLUDGE
- GAS/AEROSOL

NUMBER OF PHASES/LAYERS: 1 ☑ 2 3
% BY VOLUME (Approx.): TOP *50.00* MIDDLE BOTTOM *50.00*

VISCOSITY (If liquid present)
- ☑ 1 - 100 (e.g. WATER)
- 101 - 500 (e.g. MOTOR OIL)
- 501 - 10,000 (e.g. MOLASSES)
- > 10,000

COLOR: *varies*

ODOR
- ☑ NONE
- MILD
- STRONG

Describe:

BOILING POINT °F (°C)
- <= 95 (<=35)
- 95 - 100 (35-38)
- 101 - 129 (38-54)
- ☑ >= 130 (>54)

MELTING POINT °F (°C)
- < 140 (<60)
- 140-200 (60-93)
- > 200 (>93)

TOTAL ORGANIC CARBON
- <= 1%
- ☑ 1-9%
- >= 10%

FLASH POINT °F (°C)
- < 73 (<23)
- 73 - 100 (23-38)
- 101 -140 (38-60)
- 141 -200 (60-93)
- ☑ > 200 (>93)

Actual:

pH
- <= 2
- 2.1 - 6.9
- ☑ 7 (Neutral)
- 7.1 - 12.4
- >= 12.5

Actual:

SPECIFIC GRAVITY
- < 0.8 (e.g. Gasoline)
- 0.8-1.0 (e.g. Ethanol)
- ☑ 1.0 (e.g. Water)
- 1.0-1.2 (e.g. Antifreeze
- > 1.2 (e.g. Methylene Chloride)

ASH
- < 0.1
- 0.1 - 1.0
- 1.1 - 5.0
- 5.1 - 20.0
- > 20
- ☑ Unknown

Actual:

BTU/LB (MJ/kg)
- < 2,000 (<4.6)
- ☑ 2,000-5,000 (4.6-11.6)
- 5,000-10,000 (11.6-23.2)
- > 10,000 (>23.2)

Actual:

VAPOR PRESSURE (for liquids only) mm Hg

D. COMPOSITION (List the complete composition of the waste, include any inert components and /or debris. Ranges for individual components are acceptable. If a trade name is used, please supply an MSDS. Please do not use abbreviations.)

CHEMICAL	MIN – MAX	UOM
OIL	*25.000 – 75.000*	%
WATER	*25.000 – 75.000*	%

CHEMICAL	MIN – MAX	UOM

ANY METAL OBJECTs PRESENT? YES ☑ NO
If yes include dimension:

Clean Harbors Profile No. CH56025

E. CONSTITUENTS – Are these values based on testing or knowledge? ☑ Knowledge ☐ Testing

If constituent concentrations are base on analytical testing, analysis must be provided. If based on knowledge, basis of knowledge must be provided below.

RCRA	REGULATED METALS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL ppm
D004	ARSENIC	5.0		
D005	BARIUM	100.0		
D006	CADMIUM	1.0		
D007	CHROMIUM	5.0		
D008	LEAD	5.0		
D009	MERCURY	0.2		
D010	SELENIUM	1.0		
D011	SILVER	5.0		

RCRA	VOLATILE COMPOUNDS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL ppm
D018	BENZENE	0.5		
D019	CARBON TETRACHLORIDE	0.5		
D021	CHLOROBENZENE	100.0		
D022	CHLOROFORM	6.0		
D028	1,2-DICHLOROETHANE	0.5		
D029	1,1-DICHLOROETHYLENE	0.7		
D035	METHYL ETHYL KETONE	200.0		
D039	TETRACHLOROETHYLENE	0.7		
D040	TRICHLOROETHYLENE	0.5		
D043	VINYL CHLORIDE	0.2		

RCRA	SEMI-VOLATILE COMPOUND	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL ppm
D023	o-CRESOL	200.0		
D024	m-CRESOL	200.0		
D025	p-CRESOL	200.0		
D026	CRESOL (TOTAL)	200.0		
D027	1,4-DICHLOROBENZENE	7.5		
D030	2,4-DINITROTOLUENE	0.13		
D032	HEXACHLOROBENZENE	0.13		
D033	HEXACHLOROBUTADIENE	0.5		
D034	HEXACHLOROETHANE	3.0		
D036	NITROBENZENE	2.0		
D037	PENTACHLOROPHENOL	100.0		
D038	PYRIDINE	5.0		
D041	2,4,5-TRICHLOROPHENOL	400.0		
D042	2,4,6-TRICHLOROPHENOL	2.0		

RCRA	PESTICIDES AND HERBICIDE	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL ppm
D012	ENDRIN	0.02		
D013	LINDANE	0.4		
D014	METHOXYCHLOR	10.0		
D015	TOXAPHENE	0.5		
D016	2,4-D	10.0		
D017	2,4,5-TP (SILVEX)	1.0		
D020	CHLORDANE	0.03		
D031	HEPTACHLOR (AND ITS EPOXIDE)	0.008		

OTHER METALS	MIN	MAX	UOM
ALUMINUM			
ANTIMONY			
BERYLLIUM			
CALCIUM			
COPPER			
MAGNESIUM			
MOLYBDENUM			
NICKEL			
POTASSIUM			
SILICON			
SODIUM			
THALLIUM			
TIN			
VANADIUM			
ZINC			

NON-METALS	MIN	MAX	UOM
BROMINE			
CHLORINE			
FLUORINE			
IODINE			
SULFUR			

OTHER NON-METALS	MIN	MAX	UOM
AMMONIA			
REACTIVE SULFIDE			
CYANIDE-TOTAL			
CYANIDE AMENABLE			
CYANIDE REACTIVE			

OTHER CHEMICALS	MIN	MAX	UOM
PHENOL			
Total Petroleum Hydrocarbons			

OTHER

HOCs
- ☑ NONE
- < 1000 PPM
- >= 1000 PPM

PCBs
- ☑ NONE
- <50 PPM
- >= 50 PPM

IF PCBS ARE PRESENT, IS THE WASTE REGULATED BY TSCA 40 CFR 761?

YES ☑ NO

ADDITIONAL HAZARD

DOES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED?

YES ☑ NO (If yes, explain)

ASBESTOS	INFECTIOUS, PATHOGENIC, OR ETIOLOGICAL AGENT	REDUCING AGENT
DEA REGULATED SUBSTANCES	OXIDIZER	SHOCK SENSITIVE
DIOXIN	OSHA REGULATED CARCINOGENS	SPONTANEOUSLY IGNITES WITH AIR
EXPLOSIVE	PESTICIDE	THERMALLY SENSITIVE
HERBICIDE	POLYMERIZABLE	WATER REACTIVE
FUMING / SMOKING WASTE	RADIOACTIVE	

☑ NONE OF THE ABOVE

Clean Harbors Profile No. CH56025

F. REGULATORY STATUS

YES	☑ NO	USEPA HAZARDOUS WASTE?
☑ YES	NO	DO ANY STATE WASTE CODES APPLY? *CR02 MA01*
☑ YES	NO	IS THIS WASTE PROHIBITED FROM LAND DISPOSAL WITHOUT FURTHER TREATMENT PER 40 CFR PART 268? LDR CATEGORY: VARIANCE INFO:
YES	NO	IS THIS A UNIVERSAL WASTE?
YES	☑ NO	IS THIS A WASTEWATER PER 40 CFR PART 268.2?
YES	☑ NO	IF ANY WASTE CODES D001, D002, D003 (OTHER THAN REACTIVE CYANIDE OR REACTIVE SULFIDE), D004-D0011, D012-D017 NON-WASTEWATERS, OR D018- D043 APPLY, ARE ANY UNDERLYING HAZARDOUS (UHCs) PRESENT ABOVE UNIVERSAL TREATMENT STANDARDS (UTS)?
YES	☑ NO	DOES TREATMENT OF THIS WASTE GENERATE A F006 OR F019 SLUDGE?
YES	☑ NO	IS THIS WASTE SUBJECT TO CATEGORICAL PRETREATMENT DISCHARGE STANDARDS? IF YES, SPECIFY POINT SOURCE CATEGORY LISTED IN 40 CFR PART 401.
YES	☑ NO	IS THIS WASTE REGULATED UNDER THE BENZENE NESHAP RULES? (IS THIS WASTE FROM A CHEMICAL MANUFACTURING, COKE BY-PRODUCT RECOVERY, OR PETROLEUM REFINERY PROCESS?)
☑ YES	NO	DOES THIS WASTE CONTAIN VOC'S IN CONCENTRATIONS >=500 PPM?
☑ YES	NO	DOES THE WASTE CONTAIN GREATER THAN 20% OF ORGANIC CONSTITUENTS WITH A VAPOR PRESSURE >= .3KPA (.044 PSIA)?
YES	☑ NO	DOES THIS WASTE CONTAIN AN ORGANIC CONSTITUENT WHICH IN ITS PURE FORM HAS A VAPOR PRESSURE GREATER THAN 77 KPa (11.2PSIA)?
YES	☑ NO	IS THIS CERCLA REGULATED (SUPERFUND) WASTE ?
YES	NO	IS THIS WASTE REGULATED UNDER THE OZONE DEPLETING SUBSTANCE ACT FOR ONTARIO?

G. D.O.T INFORMATION: (Include proper shipping name, hazard class and ID number).
US D.O.T. DESCRIPTION: *NON DOT REGULATED MATERIAL, (Oil, Water) , N/A, NONE*

H. TRANSPORTATION REQUIREMENTS
ESTIMATED SHIPMENT FREQUENCY: ☑ ONE TIME WEEKLY MONTHLY QUARTERLY YEARLY OTHER *Other*

IF BULK LIQUID OR BULK SOLID PLEASE INICATE THE EXPECTED NUMBER OF LOADS PER SHIPPING FREQUENCY:

☑ CONTAINERIZED
1-5 CONTAINERS/SHIPMENT
STORAGE CAPACITY: *5*
CONTAINER TYPE:
- CUBIC YARD BOX
- PALLET
- TOTE TANK
- OTHER:
- ☑ DRUM SIZE: *55*

CONTAINER MATERIAL:
- ☑ STEEL
- FIBER
- PLASTIC
- OTHER

BULK LIQUID
GALLONS/SHIPMENT: GAL.
FROM TANKS: TANK SIZE GAL
FROM DRUMS
VEHICLE TYPE:
- VAC TRUCK
- TANK TRUCK
- RAILROAD TANK CAR

CHECK COMPATIBLE STORAGE MATERIALS.
- STEEL
- STAINLESS STEEL
- RUBBER LINED
- FIBERGLASS LINED
- DERAKANE
- OTHER

BULK SOLID
SHIPMENT UOM: TON YARD
PER SHIPMENT: 0.00 MIN 0.00 MAX
STORAGE CAPACITY TON/YD
VEHICLE TYPE:
- DUMP TRAILER
- ROLL OFF BOX
- INTERMODAL ROLLOFF BOX
- CUSCO/VACTOR
- OTHER

I. SPECIAL REQUEST
SPECIFIC DISPOSAL RESTRICTIONS OR REQUESTS: *A32*
SPECIAL WASTE HANDLING REQUIREMENTS:
OTHER COMMENTS OR REQUESTS:

J. BIENNIAL / ANNUAL REPORTING INFORMATION
SIC CODE *3499* SOURCE CODE *G22* FORM CODE *W001*

K. SAMPLE STATUS	YES	SAMPLED BY	DATE SAMPLED	WHERE SENT
REPRESENTATIVE SAMPLE HAS BEEN SUPPLIED.	☑ NO			

GENERATORS CERTIFICATION

I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I aslo certify that any samples submitted are representative of the actual waste. If Clean Harbors discovers a discrepancy during the approval process, Generator grants Clean Harbors the authority to amend the profile, as Clean Harbors deems necessary, to reflect the discrepancy.

AUTHORIZED SIGNATURE	NAME (PRINT)	TITLE	DATE

LABELLA
LaBella Associates, P.C.
300 State Street
Rochester, New York 14614

Attachment D

Spot Check Information, Bill of Lading and Waste Stream Profile Sheets for Drums Disposed of on January 12, 2006

Waste Receiving Report

Services, Inc.

Containers

Plant Received Date: 1/17/2006 8:25:44AM
Work Order #: **D21102551**
Receiving Facility: Spring Grove Plant (SG)
Equipment:

Generator: American Motive Power Inc (AM2732)
Customer: LMC Industrial Contractors (LM0000)
Manifest: **BOL156256** Cnt: **1**
Generator EPA ID: NYCESQG99999 State EPA ID:

Line Item	Shipping Name/ US DOT Description	UN/NA Number	Container No. Type	Total Quantity	Unit Wt/Vol	CHI Pre-Code	Profile Number	Pkg Grp	Hazard Class	Hzrd Zone
1A	NON DOT REGULATED MATERIAL (ABSORBANT MEDIA, OIL)	N/A	26 DM	2,400	P	CNO	CH144353	NONE	NONE NON DOT HAZARDOUS MATERIAL	

Profile Constituents (ordered by Max %)	Min	Max						Min	Max
ABSORBANT MEDIA	90.00	99.00	LATEX PAINT			0.00	10.00	Oil (gear, lube, machine)	1.00	10.00
WATER	0.00	5.00								

State Codes: NONE

Least Cost Outlet	Outbound Profile	Outbound Profile Description	Cons (Y/N)
None*			

Billing Requirements:

Container (Y/N)	Weight (Y/N)	Special Instructions
	N	

Restrictions:

Restrictions, Other:

Drum No.	Final Code	Qty	Cont. Type	H2O Mix (+/-)	Ph (Value)	Ign (+/-)	CN (+/-)	Sulfide (+/-)	PCB Value	Rad (+/-)	Oxid (+/-)	CC Insp	CHL (+/-)	Weight	Weight UOM	Comments
3012034	CNO	55	DM	-	7	-	-	-		-	-	+	-	0		CH144353 AM2732 ABSORBENTS
3012035	CNOS	55	DM											0		CH144353 AM2732 OIL, WATER
3012036	CNO	55	DM											0		CH144353 AM2732
3012037	CNOS	55	DM											0		CH144353 AM2732
3012038	CNO	55	DM											0		CH144353 AM2732
3012039	↓	55	DM											0		CH144353 AM2732
3012040	CNOS	55	DM											0		CH144353 AM2732
3012041	↓	55	DM											0		CH144353 AM2732
3012042	↓	55	DM											0		CH144353 AM2732
3012043	CNO	55	DM											0		CH144353 AM2732
3012044	↓	55	DM											0		CH144353 AM2732
3012045	↓	55	DM											0		CH144353 AM2732

Plant Received Date: 1/17/2006 8:25:44AM
Work Order #: **D21102551**
Receiving Facility: Spring Grove Plant (SG)
Equipment:

Generator: American Motive Power Inc (AM2732)
Customer: LMC Industrial Contractors (LM0000)
Manifest: **BOL156256** Cnt: **1**
Generator EPA ID: NYCESQG99999 State EPA ID:

Drum No.	Final Code	Qty	Cont. Type	H2O Mix (+/-)	Ph (Value)	Ign (+/-)	CN (+/-)	Sulfide (+/-)	PCB Value	Rad (+/-)	Oxid (+/-)	CC Insp	CHL (+/-)	Weight	Weight UOM	Comments
8012046	CNOS	55	DM											0		CH144353 AM2732
8012047		55	DM											0		CH144353 AM2732
8012048		55	DM											0		CH144353 AM2732
8012049	CNO	55	DM											0		CH144353 AM2732
8012050		55	DM											0		CH144353 AM2732
8012051		55	DM											0		CH144353 AM2732
8012052	CNOS	55	DM											0		CH144353 AM2732
8012053	CNO	55	DM											0		CH144353 AM2732
8012054	CNOS	55	DM											0		CH144353 AM2732
8012055	CNO	55	DM											0		CH144353 AM2732
8012056	CNOS	55	DM											0		CH144353 AM2732
8012057	CNO	55	DM											0		CH144353 AM2732
8012058		55	DM											0		CH144353 AM2732
8012059	CNOS	55	DM											0		CH144353 AM2732

26 Item(s) printed for BOL156256

Feb-20-06 03:43pm From-Clean Harbors T-655 P.003/003 F-283
513 891 7623
FEB-20-2006 15:59 FROM:CLEAN HARBORS BDT, L 7128384O5 TO:15854543066 P.2/2

TOTAL P.02

Site Address:
SAME

132

PPW 11/29/2005
WORK ORDER NO. 021102551

DOCUMENT NO. 156256 **STRAIGHT BILL OF LADING**

TRANSPORTER 1 Clean Harbors Env Services Inc VEHICLE ID # NY-AL68002

EPA ID # MAD039322250 TRANS. 1 PHONE (781) 849-1800

TRANSPORTER 2 Frank's Vacuum Truck Service Inc VEHICLE ID # AL62852 NY

EPA ID # NYD982792814 TRANS. 2 PHONE 716-694-2132

DESIGNATED FACILITY			SHIPPER		
Spring Grove Resource Recovery			American Motive Power Inc		
FACILITY EPA ID # OHD000816629			SHIPPER EPA ID # NYCESQG999999		
ADDRESS 4879 Spring Grove Avenue			ADDRESS 9431 Foster Wheeler Road		
CITY Cincinnati	STATE OH	ZIP 45232	CITY Dansville	STATE NY	ZIP 14437

CONTAINERS NO. & SIZE	TYPE	HM	DESCRIPTION OF MATERIALS	TOTAL QUANTITY	UNIT WT/VOL
26X55	DM		A. NON DOT REGULATED MATERIAL, (ABSORBANT MEDIA, OIL), NONE, N/A	2400	P
			B.		
			C.		
			D.		
			E.		
			F.		
			G.		
			H.		

SPECIAL HANDLING INSTRUCTIONS EMERGENCY PHONE #: (800) 483-3718
A: CH144353

CP
FS

SHIPPERS CERTIFICATION: This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

	PRINT	SIGN	DATE
SHIPPER	Keith Griese	Keith Griese	1-12-06
TRANSPORTER 1	MARK LUHR	Mark Luhr	1-12-06
TRANSPORTER 2	ROBERT LEWIS	Robert Lewis	1-13-06
RECEIVED BY	Nick Kelly	Nick Kelly	01/17/06

4

WASTE MATERIAL PROFILE SHEET

Clean Harbors Profile No. CH144353

A. GENERAL INFORMATION

GENERATOR EPA-ID: NYCESQG99999
GENERATOR PROFILE No. **CH144353**
GENERATOR CODE (Assigned by Clean Harbors) *AM2732*
ADDRESS *9431 Foster Wheeler Road*
GENERATOR NAME: *American Motive Power Inc*
CITY *Dansville* STATE *NY* ZIP/POSTAL CODE *14437*
PHONE:

CUSTOMER CODE (Assigned by Clean Harbors) *LM0000*
CUSTOMER NAME: *LMC Industrial Contractors*
ADDRESS *2060 Lakeville Road*
CITY *Avon* STATE/PROVINCE *NY* ZIP/POSTAL CODE *14414*

B. WASTE DESCRIPTION

WASTE DESCRIPTION: *Zip sorb and oil solid w/o liquid*
PROCESS GENERATING WASTE (Please provide detailed description of process generating waste):
clean up of oil from spills or cleaning of leaks in machine operation

C. PHYSICAL PROPERTIES (at 25C or 77F)

PHYSICAL STATE
- ☑ SOLID WITHOUT FREE LIQUID
- POWDER
- MONOLITHIC SOLID
- LIQUID WITH NO SOLIDS
- LIQUID/SOLID MIXTURE
  - % FREE LIQUID
  - % SETTLED SOLID
  - % TOTAL SUSPENDED SOLID
- SLUDGE
- GAS/AEROSOL

NUMBER OF PHASES/LAYERS: 1 2 3
% BY VOLUME (Approx.): TOP / MIDDLE / BOTTOM

VISCOSITY (If liquid present)
- 1 - 100 (e.g. WATER)
- 101 - 500 (e.g. MOTOR OIL)
- 501 - 10,000 (e.g. MOLASSES)
- > 10,000

COLOR: *varies*

ODOR
- ☑ NONE
- MILD
- STRONG

Describe:

BOILING POINT °F (°C)
- <= 95 (<=35)
- 95 - 100 (35-38)
- 101 - 129 (38-54)
- >= 130 (>54)

MELTING POINT °F (°C)
- < 140 (<60)
- 140-200 (60-93)
- > 200 (>93)

TOTAL ORGANIC CARBON
- <= 1%
- ☑ 1-9%
- >= 10%

FLASH POINT °F (°C)
- < 73 (<23)
- 73 - 100 (23-38)
- 101 -140 (38-60)
- 141 -200 (60-93)
- > 200 (>93)

Actual:

pH
- <= 2
- 2.1 - 6.9
- ☑ 7 (Neutral)
- 7.1 - 12.4
- >= 12.5

Actual:

SPECIFIC GRAVITY
- < 0.8 (e.g. Gasoline)
- 0.8-1.0 (e.g. Ethanol)
- ☑ 1.0 (e.g. Water)
- 1.0-1.2 (e.g. Antifreeze
- > 1.2 (e.g. Methylene Chloride)

ASH
- < 0.1
- 0.1 - 1.0
- 1.1 - 5.0
- 5.1 - 20.0
- > 20
- ☑ Unknown

Actual:

BTU/LB (MJ/kg)
- ☑ < 2,000 (<4.6)
- 2,000-5,000 (4.6-11.6)
- 5,000-10,000 (11.6-23.2)
- > 10,000 (>23.2)

Actual:

VAPOR PRESSURE (for liquids only) mm Hg

D. COMPOSITION (List the complete composition of the waste, include any inert components and /or debris. Ranges for individual components are acceptable. If a trade name is used, please supply an MSDS. Please do not use abbreviations.)

CHEMICAL	MIN – MAX	UOM
Absorbant media	*90.000 – 99.000*	%
LATEX PAINT	*0.000 – 10.000*	%
Oil (gear, lube, machine)	*1.000 – 10.000*	%
WATER	*0.000 – 5.000*	%

CHEMICAL	MIN – MAX	UOM

ANY METAL OBJECTs PRESENT? YES ☑ NO
If yes include dimension:

Clean Harbors Profile No. CH144353

E. CONSTITUENTS – Are these values based on testing or knowledge? ☑ Knowledge ☐ Testing

If constituent concentrations are base on analytical testing, analysis must be provided. If based on knowledge, basis of knowledge must be provided below.

normal machine operations of transport components

RCRA	REGULATED METALS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL ppm
D004	ARSENIC	5.0		
D005	BARIUM	100.0		
D006	CADMIUM	1.0		
D007	CHROMIUM	5.0		
D008	LEAD	5.0		
D009	MERCURY	0.2		
D010	SELENIUM	1.0		
D011	SILVER	5.0		

RCRA	VOLATILE COMPOUNDS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL ppm
D018	BENZENE	0.5		
D019	CARBON TETRACHLORIDE	0.5		
D021	CHLOROBENZENE	100.0		
D022	CHLOROFORM	6.0		
D028	1,2-DICHLOROETHANE	0.5		
D029	1,1-DICHLOROETHYLENE	0.7		
D035	METHYL ETHYL KETONE	200.0		
D039	TETRACHLOROETHYLENE	0.7		
D040	TRICHLOROETHYLENE	0.5		
D043	VINYL CHLORIDE	0.2		

RCRA	SEMI-VOLATILE COMPOUND	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL ppm
D023	o-CRESOL	200.0		
D024	m-CRESOL	200.0		
D025	p-CRESOL	200.0		
D026	CRESOL (TOTAL)	200.0		
D027	1,4-DICHLOROBENZENE	7.5		
D030	2,4-DINITROTOLUENE	0.13		
D032	HEXACHLOROBENZENE	0.13		
D033	HEXACHLOROBUTADIENE	0.5		
D034	HEXACHLOROETHANE	3.0		
D036	NITROBENZENE	2.0		
D037	PENTACHLOROPHENOL	100.0		
D038	PYRIDINE	5.0		
D041	2,4,5-TRICHLOROPHENOL	400.0		
D042	2,4,6-TRICHLOROPHENOL	2.0		

RCRA	PESTICIDES AND HERBICIDE	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL ppm
D012	ENDRIN	0.02		
D013	LINDANE	0.4		
D014	METHOXYCHLOR	10.0		
D015	TOXAPHENE	0.5		
D016	2,4-D	10.0		
D017	2,4,5-TP (SILVEX)	1.0		
D020	CHLORDANE	0.03		
D031	HEPTACHLOR (AND ITS EPOXIDE)	0.008		

OTHER METALS	MIN	MAX	UOM
ALUMINUM			
ANTIMONY			
BERYLLIUM			
CALCIUM			
COPPER			
MAGNESIUM			
MOLYBDENUM			
NICKEL			
POTASSIUM			
SILICON			
SODIUM			
THALLIUM			
TIN			
VANADIUM			
ZINC			

NON-METALS	MIN	MAX	UOM
BROMINE			
CHLORINE			
FLUORINE			
IODINE			
SULFUR			

OTHER NON-METALS	MIN	MAX	UOM
AMMONIA			
REACTIVE SULFIDE			
CYANIDE-TOTAL			
CYANIDE AMENABLE			
CYANIDE REACTIVE			

OTHER CHEMICALS	MIN	MAX	UOM
PHENOL			
Total Petroleum Hydrocarbons			

OTHER

HOCs

☑ NONE
< 1000 PPM
>= 1000 PPM

PCBs

☑ NONE
<50 PPM
>= 50 PPM

IF PCBS ARE PRESENT, IS THE WASTE REGULATED BY TSCA 40 CFR 761?

YES ☑ NO

ADDITIONAL HAZARD

DOES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED?

YES ☑ NO (If yes, explain)

ASBESTOS	INFECTIOUS, PATHOGENIC, OR ETIOLOGICAL AGENT	REDUCING AGENT
DEA REGULATED SUBSTANCES	OXIDIZER	SHOCK SENSITIVE
DIOXIN	OSHA REGULATED CARCINOGENS	SPONTANEOUSLY IGNITES WITH AIR
EXPLOSIVE	PESTICIDE	THERMALLY SENSITIVE
HERBICIDE	POLYMERIZABLE	WATER REACTIVE
FUMING / SMOKING WASTE	RADIOACTIVE	
NONE OF THE ABOVE		

Clean Harbors Profile No. CH144353

F. REGULATORY STATUS

YES ☑ NO USEPA HAZARDOUS WASTE?

YES ☑ NO DO ANY STATE WASTE CODES APPLY?

YES ☑ NO IS THIS WASTE PROHIBITED FROM LAND DISPOSAL WITHOUT FURTHER TREATMENT PER 40 CFR PART 268?
LDR CATEGORY:
VARIANCE INFO:

YES ☑ NO IS THIS A UNIVERSAL WASTE?

YES ☑ NO IS THIS A WASTEWATER PER 40 CFR PART 268.2?

YES ☑ NO IF ANY WASTE CODES D001, D002, D003 (OTHER THAN REACTIVE CYANIDE OR REACTIVE SULFIDE), D004-D0011, D012-DO17 NON-WASTEWATERS, OR D018- D043 APPLY, ARE ANY UNDERLYING HAZARDOUS (UHCs) PRESENT ABOVE UNIVERSAL TREATMENT STANDARDS (UTS)?

YES ☑ NO DOES TREATMENT OF THIS WASTE GENERATE A F006 OR F019 SLUDGE?

YES ☑ NO IS THIS WASTE SUBJECT TO CATEGORICAL PRETREATMENT DISCHARGE STANDARDS?
IF YES, SPECIFY POINT SOURCE CATEGORY LISTED IN 40 CFR PART 401.

YES ☑ NO IS THIS WASTE REGULATED UNDER THE BENZENE NESHAP RULES? (IS THIS WASTE FROM A CHEMICAL MANUFACTURING, COKE BY-PRODUCT RECOVERY, OR PETROLEUM REFINERY PROCESS?)

YES ☑ NO DOES THIS WASTE CONTAIN VOC'S IN CONCENTRATIONS >=500 PPM?

YES ☑ NO DOES THE WASTE CONTAIN GREATER THAN 20% OF ORGANIC CONSTITUENTS WITH A VAPOR PRESSURE >= .3KPA (.044 PSIA)?

YES ☑ NO DOES THIS WASTE CONTAIN AN ORGANIC CONSTITUENT WHICH IN ITS PURE FORM HAS A VAPOR PRESSURE GREATER THAN 77 KPa (11.2PSIA)?

YES ☑ NO IS THIS CERCLA REGULATED (SUPERFUND) WASTE ?

YES ☑ NO IS THIS WASTE REGULATED UNDER THE OZONE DEPLETING SUBSTANCE ACT FOR ONTARIO?

G. D.O.T INFORMATION: (Include proper shipping name, hazard class and ID number).

US D.O.T. DESCRIPTION: *NON DOT REGULATED MATERIAL, NONE, N/A*

H. TRANSPORTATION REQUIREMENTS

ESTIMATED SHIPMENT FREQUENCY: ONE TIME WEEKLY MONTHLY ☑ QUARTERLY YEARLY OTHER *Other*

IF BULK LIQUID OR BULK SOLID PLEASE INICATE THE EXPECTED NUMBER OF LOADS PER SHIPPING FREQUENCY:

☑ **CONTAINERIZED**

1-10 CONTAINERS/SHIPMENT

STORAGE CAPACITY: *10*

CONTAINER TYPE:
- CUBIC YARD BOX
- PALLET
- TOTE TANK
- OTHER:
- DRUM SIZE: *55*

CONTAINER MATERIAL:
- ☑ STEEL
- FIBER
- PLASTIC
- OTHER

BULK LIQUID

GALLONS/SHIPMENT: GAL.

FROM TANKS: TANK SIZE GAL.

FROM DRUMS

VEHICLE TYPE.
- VAC TRUCK
- TANK TRUCK
- RAILROAD TANK CAR

CHECK COMPATIBLE STORAGE MATERIALS.

STEEL	STAINLESS STEEL
RUBBER LINED	FIBERGLASS LINED
DERAKANE	

OTHER

BULK SOLID

SHIPMENT UOM: TON YARD

PER SHIPMENT: 0.00 MIN 0.00 MAX

STORAGE CAPACITY TON/YD

VEHICLE TYPE:
- DUMP TRAILER
- ROLL OFF BOX
- INTERMODAL ROLLOFF BOX
- CUSCO/VACTOR
- OTHER

. SPECIAL REQUEST

SPECIFIC DISPOSAL RESTRICTIONS OR REQUESTS:

SPECIAL WASTE HANDLING REQUIREMENTS:

OTHER COMMENTS OR REQUESTS: ***oil contaminated absorbant***

. BIENNIAL / ANNUAL REPORTING INFORMATION

SIC CODE *3369* SOURCE CODE *G33* FORM CODE *W319*

. SAMPLE STATUS

	YES	SAMPLED BY	DATE SAMPLED	WHERE SENT
REPRESENTATIVE SAMPLE HAS BEEN SUPPLIED.	☑ NO			

ENERATORS CERTIFICATION

I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I aslo certify that any samples submitted are representative of the actual waste. If Clean Harbors discovers a discrepancy during the approval process, Generator grants Clean Harbors the authority to amend the profile, as Clean Harbors deems necessary, to reflect the discrepancy.

AUTHORIZED SIGNATURE	NAME (PRINT)	TITLE	DATE
	Karl Thielges	*Plant Mgr.*	*11/30/2005*